



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

June 11, 2013

**RE: Pretreatment Compliance Inspection and  
Notice of Violation**

Ms. Julie Cotrell  
Agrana Fruits US, Inc.  
P.O. Box 459  
Botkins, OH 45306-0459

Dear Ms. Cotrell:

On May 20<sup>th</sup>, I met with you and Terry Fisher to inspect your facility's wastewater pretreatment system. Since my previous inspection, Agrana reported a violation of its daily maximum total suspended solids limit of 218 mg/l on June 12, 2012 with a result of 222 mg/l. You provided timely notification and explained the cause, so it is not necessary to address this violation further.

Beginning in July 2012, the quality of the effluent has been very good; thank you for your efforts to maintain compliance with your permit.

In January 2013, you began analyzing samples in-house for pH, biochemical oxygen demand (BOD) and total suspended solids (TSS). It appeared that all necessary documentation associated with these analyses was in order. The laboratory space is somewhat cramped. I encourage you to pursue improvements that will help ensure good analytical procedures are able to be maintained. I found Mr. Fisher's documentation of analytical results to be in very good order. Although not discussed at the time of the inspection, please make sure that procedures for each analytical method are readily available in the lab. Mr. Fisher could develop his own procedure descriptions based on the approved methodology and the unique equipment he uses.

Please start documenting the temperature of the incubator and drying oven. Weekly readings should be taken and recorded in a log book and the thermometers should be checked against an NIST-traceable thermometer at least annually with the correction value posted (and dated) with each thermometer.

I did not see that you have reviewed and updated the equipment maintenance manual that my previous inspection noted was to occur last May. Please let me know if this review and update is still expected to occur and, if so, when it will happen.

There were several diffusers in the treatment lagoon that appeared to be disconnected from the diffuser drops as evidenced by vigorous and isolated bubbles and upwelling in the location of the diffusers. Please work to minimize the number of diffusers in need of maintenance so the aeration system is kept balanced and effective.

Finally, while observing the sampling station, the automatic composite sampler was displaying a program code that we were not able to decipher. There was still some question in my mind as to whether flow-proportional sampling was occurring. Please investigate the programming code and let me know what you learn. Also, confirm that samples are collected at the stated frequency of 100 milliliters every 2,000 gallons discharged.

Please provide a written response to this letter by July 22, 2013. If you have any questions about this letter or the inspection form, please contact me at (937) 285-6095.

Sincerely,



Matt Walbridge  
Pretreatment Coordinator  
Division of Surface Water

MW/tb

Enclosure

ec: Jesse Kent - Village of Botkins  
Ryan Laake - Ohio EPA / Central Office / DSW



Southwest District Office

**PRETREATMENT INSPECTION REPORT**

PERMIT NUMBER <b>1DP00022*DP</b>	FACILITY NUMBER <b>OHP000126</b>	DATE CONDUCTED <b>May 20, 2013</b>		
INSPECTION TYPE <b>I</b>	INSPECTOR <b>S</b>	FACILITY TYPE <b>2</b>	TIME IN <b>1100</b>	TIME OUT <b>1310</b>

**GENERAL INFORMATION**

NAME AND LOCATION OF FACILITY <b>Agrana Fruit US, Inc. 16197 North County Road 25-A Botkins, OH 45306</b>	POTW RECEIVING DISCHARGE <b>Village of Botkins WWTP</b>
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MAILING ADDRESS OF FACILITY  
**Agrana Fruit US, Inc.  
P.O. Box 459  
Botkins, OH 45306**

CONTACT (NAME/TITLE/PHONE/E-MAIL)  
**Ms. Julie Cotrell / Regulatory Coordinator / (937) 693-3821 / Julie.COTRELL@agrana.com**

**FACILITY EVALUATION** (See Inspection letter for more complete description)

(S = Satisfactory, M = Marginal, U = Unsatisfactory, NA = Not Applicable)

<b>S</b>	Sampling Procedures	<b>NA</b>	Compliance schedule requirements
<b>S</b>	Reporting	<b>S</b>	Notification
<b>S</b>	Compliance with effluent limits	-	Other -

*\*see inspection letter for summary*

Name and Signature of Inspector(s)  <b>Matt Walbridge</b>	Agency / Office / Telephone <b>Ohio EPA / Southwest District Office / (937) 285-6095</b>	Date <b>6-11-13</b>
Signature of Reviewer 	Ohio EPA / Southwest District Office / (937) 285-6034	Date <b>6/13/13</b>

## INDUSTRIAL USER INSPECTION CHECKLIST

Facility: **Agrana Fruits US, Inc.**

Date of inspection: **May 20, 2013**

Facility Number: **OHP000126**

IDP Number: **1DP00022\*CP**

Facility Representative: **Julie Cotrell**

Inspector(s): **Matt Walbridge**

### COMPLIANCE

1. Date of last pretreatment inspection: **May 7, 2012**
2. Has the facility been in compliance with its permit limits since the last inspection? Y/N  
If no, explain:  
**Violation of daily maximum total suspended solids limit of 218 mg/l on June 12, 2012 with a result of 222 mg/l.**  
**Since July 2013, they have been discharging very low pounds of BOD (less than 10 pounds) and TSS (about 25 pounds). Their permit limits these each to 200 pounds per day.**  
**During the second half of 2012, they sent 120,000 gallons from the DAF to the Large Lagoon. No wastewater was sent from the treatment lagoon to the Large Lagoon.**
3. Is the facility in compliance with all other requirements? Y/N/NA  
Sampling procedures (*although there is some question about flow-proportional sampling*) Y/N/NA  
Reporting (late reporting, failure to report, etc) Y/N/NA  
Compliance schedules Y/N/NA  
Submitted BMR and 90 day compliance reports Y/N/NA  
Any other requirements Y/N/NA  
  
If any of the above five answers is no, explain:
4. Was the facility required to perform any actions as a result of the last inspection? Y/N  
Explain any unresolved actions: **None**

### FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: **~150**                      6. Shifts/Day: **3**  
*(sanitation usually occurs on 2<sup>nd</sup> shift on Tuesdays and Fridays)*
7. Production Days/Year: **~252 (5-day work weeks w/ some Saturdays)**                      8. Hours/shift: **8**  
*(6 or 7-day work weeks during January - March because New Year's resolution diets)*
9. Any production changes since the last inspection? Y/N  
If yes, explain: **There are eight lines with one (Line 7) starting to be operated more often.**
10. General facility description and operations:  
**Fruit preparations for use in the dairy industry. Sole supplier to Dannon. Also supply Yoplait.**  
**Frozen Fruit → Thaw → Portioning → Cooker → Cool → Packaging → Cool → Ship**  
↑ ↑  
*starch, sweeteners, flavor, etc.*                      *mostly totes (~99%)*

FACILITY OPERATIONAL CHARACTERISTICS CONTINUED

11. Any change in materials used in production since the last inspection? Y / N  
**Basic ingredients include fruit, starch, pectin, sweeteners and flavorings. Also, they have been turning down small orders for custom flavors.**

If yes, explain:

12. Any expansion or production increase expected within the next year? Y / N  
If yes, explain:

**Production is expected to increase slightly from current annual rate of approximately 145 million pounds. Previous plans to expand the facility are now likely not going to happen**

WASTEWATER TREATMENT

13. Provide a schematic diagram and description of the wastewater treatment system:

**Please see attached diagrams.**

14. Was a PTI issued for the treatment system? Y / N

15. Were there any modifications to the treatment system since the previous inspection? Y / N

**The variable-speed centrifugal sludge pump that replaced the air diaphragm pump experienced a rupture that sprayed sludge all over the place. It still looks like the pump needs to be made a more formal and permanent part of the pretreatment system.**

**The dewatering belt on the filter press was replaced in May 2013. No sludge was removed in April.**

If yes, was a PTI obtained? NA Y / N

PTI Number:

Date:

16. What is the treatment mode of operation? Batch / Continuous / Combination

If batch, list the frequency and duration:

17. Who is responsible for operating the treatment system?

**Julie Cotrell is the supervisor. The treatment lagoon operates 24/7. The DAF system is operated 24 hours per day, Monday through Friday fifty percent of the time. The belt filter press is operated 8 hours per day, 5 days a week.**

**Terry Fisher operates the DAF/belt filter press during 1<sup>st</sup> shift and it is his primary responsibility. Other staff in the maintenance department operate the system during 2<sup>nd</sup> and 3<sup>rd</sup> shifts if needed to make up for lost time on 1<sup>st</sup>. System checks on 2<sup>nd</sup> and 3<sup>rd</sup> shifts are documented.**

18. How often is the treatment system checked?

**Throughout the day.**

**Operational target is ~3,000 MLSS (currently at ~3,800) which is checked weekly. An Imhoff cone is used daily to check for settlability. Beginning in January 2013 Agrana started using their new in-house lab with periodic duplicates sent to Brookside Labs.**

**WASTEWATER TREATMENT CONTINUED**

19. Is there an alarm system for the system? Y/N  
 Explain: **Ms. Cotrell has five web cam feeds of the DAF to her desktop PC where she can see if surface solids get too close to the effluent end of the DAF. There is an autopager for the aeration power system and a high and low-level alarm on the lift station. There is also a relay to shut off the discharge pump if daily flow exceeds permitted flow at the DAF and at the monitoring location.**  
  
**There are set points for flow for the DAF influent and effluent. There are set points for pH on the effluent from the DAF. There is also an alarm for diversion of flow to the treatment lagoon.**
20. Is there an operations and maintenance manual? Y/N  
**The equipment maintenance manuals have been inserted into the preventive maintenance scheduler – this included the blowers that recently failed. The maintenance manual was generated in-house and was scheduled to be reviewed in early May.**
21. Is an inventory of critical spare parts maintained? Y/N  
 If yes, list: **They have an automated inventory management system (keeps track of when inventory is tapped and notifies when it's time to order new parts).**  
  
**Belts and oil for the blowers.**  
**Actuator and cylinders for belt filter press, rebuild kits for pumps. Press belts can be obtained in a reasonable time so they no longer keep a spare on-site.**  
**Motors for pumps can be fixed in a few days.**
22. Are there any bypasses diversions in the system? Y/N  
 If yes, describe the location:  
**(Although wastewater was diverted from the treatment lagoon up to the large lagoon.)**  
  
 Have bypasses diversions occurred since the last inspection? Y/N  
 Was the POTW notified? NA Y/N
23. Are residuals or sludges generated? Y/N  
  
 Method of disposal: **Sludge from DAF filter press goes into a trailer and then is hauled to Kloepfel Farm as animal feed and compost feed stock.**  
  
**Residues from the micro screen, from C.I.P. and tote washing and any off-spec materials are collected in a tanker kept on-site. Agrana has hog and cattle farmers that pick it up for use as animal feed.**  
  
 Frequency and amount of disposal: **~5,000 gallons of residues from the hydro sieve, C.I.P., tote washing and any off-spec materials are generated a couple of times per week (depends on how much off-spec material is generated).**  
  
**Approx. 20 tons of DAF solids (pressed) are generated twice a week. About ten loads per month.**  
  
 Name of hauler/landfill/disposal facility: **Jay Holman out of the Maria Stein area (hog farmer) takes the residues. Kloepfel Farms takes the DAF solids and waste fruit for animal feed.**  
  
 Is any sludge generated subject to RCRA regulations? Y/N  
  
 If land applying sludge, is there a sludge management plan? N.A. Y/N  
**Composting facilities are not covered by surface water rules**

**PROCESS AND WASTEWATER INFORMATION**

24. List all processes generating wastewater, current wastewater flows, and where applicable, production rates as well as values on which the permit limits are based:

REGULATED PROCESS	SAMPLE LOCATION	WASTEWATER FLOW (GPD)		PRODUCTION DATA (SPECIFY UNITS)	
		Permit	Current	Permit	Current
1. Tote Washing	N.A.	-	Flows from individual processes are not measured	N.A.	N.A.
2. Clean in place (CIP)	N.A.	-		N.A.	N.A.
3. Floor Wash Downs	N.A.	-		N.A.	N.A.
<i>(These 3 are in order of water usage)</i>					
4.					
5.					
<b>Total Regulated Process Flow</b>	<i>Flow Monitoring Station</i>	<b>200,000</b>	<b>~140,000 <sup>(1)</sup></b>	<p><sup>(1)</sup> This valued is based on reported discharge flows for the second half of 2012. Flows are expected to be higher in 2013.</p> <p>Higher flows on some production days/weeks are attenuated by the treatment lagoon.</p> <p>In the second half of 2012, no wastewater was sent from the treatment lagoon to the large storage lagoon.</p> <p><sup>(2)</sup> Only process wastewater is present at sampling point. Other wastewaters (sanitary, regeneration of small softener used for boiler feed) are discharged to the sewer via a separate line.</p>	
Noncontact Cooling	-	-	-		
Boiler Condensate	<sup>(2)</sup>	-	-		
Reverse Osmosis		-	-		
Demineralizer Regeneration	<sup>(2)</sup>	-	-		
Softener Backwash	-	-	-		
Filter Backwash	-	-	-		
Compressor Condensate	-	-	-		
Storm water	-	-	-		
<b>Total of Dilute Flows</b>	<b>N.A.</b>	<b>N.A.</b>	<b>N.A.</b>		
Unregulated Flows	N.A.	-	-		
Sanitary	N.A.	N.A. <sup>(2)</sup>	N.A. <sup>(2)</sup>		
<b>TOTAL FLOW</b>	<i>Flow Monitoring Station</i>	<b>200,000</b>	<b>~140,000 <sup>(1)</sup></b>		

25. For the above flows not discharged to the POTW, list point of discharge and permit (if any).

**Storm water runoff is discharged through a swale to the roadside ditch in front of the facility – this runoff is dispersed as it travels through the grassy lawn area prior to the roadside ditch.**

## SELF MONITORING

26. Sample location(s) described in the facility=s permit:  
***"Flow-proportional samples shall be collected from the wastewater treatment system flow monitoring station."***
27. Is the facility sampling at the location(s) described in the permit? Y / N  
If no, describe the actual location:
28. Is the location(s) where the facility is sampling representative? Y / N  
If no, indicate a representative location:
29. Is the flow measured or estimated? Measured / Estimated  
If measured, how often is the meter calibrated?  
***ISCO came out to the facility in Fall 2011 to calibrate the meter. They indicated that they performed some type of repair; it would be good to know what that repair was.***  
***Agrana often checks to see if the meter reads zero when there is no flow.***  
If estimated, describe method of estimation:
30. Is pH monitored continuously? ***(The lowest recorded value is what is required to be reported)*** Y / N  
If yes, how often is the meter calibrated?  
***Every month – it's part of the preventative maintenance program.***  
***Done using 4 & 10 buffer solutions with a 7 buffer solution check.***
31. Does the facility collect its own samples? Y / N  
If no, specify the sample collector:  
***Terry sets up the automatic sampler to collect the sample. Mr. Swank picks up the sample and takes it to the lab.***  
***The autosampler collects a sample every day. Personnel from the Village of Botkins empty the sample jug every day after they pick up their sample - except on Tuesdays.***  
***Agrana collects their weekly sample on Tuesdays (the village won't dump if they're there first).***
32. Are appropriate sampling procedures followed?  
Monitoring frequencies Y / N  
Sample collection (grab for pH, O&G, CN, phenols, VOCs) Y / N  
Flow proportioned samples ***(programmed for 100 ml aliquot every 2,000 gallons discharged\*)*** Y / N  
Proper preservation techniques Y / N  
Sample holding times Y / N  
Chain-of-custody forms Y / N  
***\* There was a code on the sampler that needs to be checked out.***
33. Are samples analyzed in accordance with 40 CFR 136? Y / N  
***Good documentation.***
34. Laboratory conducting analyses: ***In-house.***

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**TOXICS MANAGEMENT**

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35. Are any listed toxic organics used in the facility? Y/N  
If yes, identify organics:
36. Does the facility have a current toxic organic management plan (TOMP)? (N NA Y/N  
If yes, is it being implemented? NA Y/N
37. Has the facility had any uncontrolled releases or spills to the POTW since the previous inspection? If yes, please explain: Y/N
38. Does the facility need a spill prevention plan or slug discharge control plan? Y/N  
If yes, does the facility have a written plan? NA Y/N
39. Identify any potential slug load or spill areas: **No reasonable potential.**

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**REQUIRED FOLLOW-UP ACTIONS**

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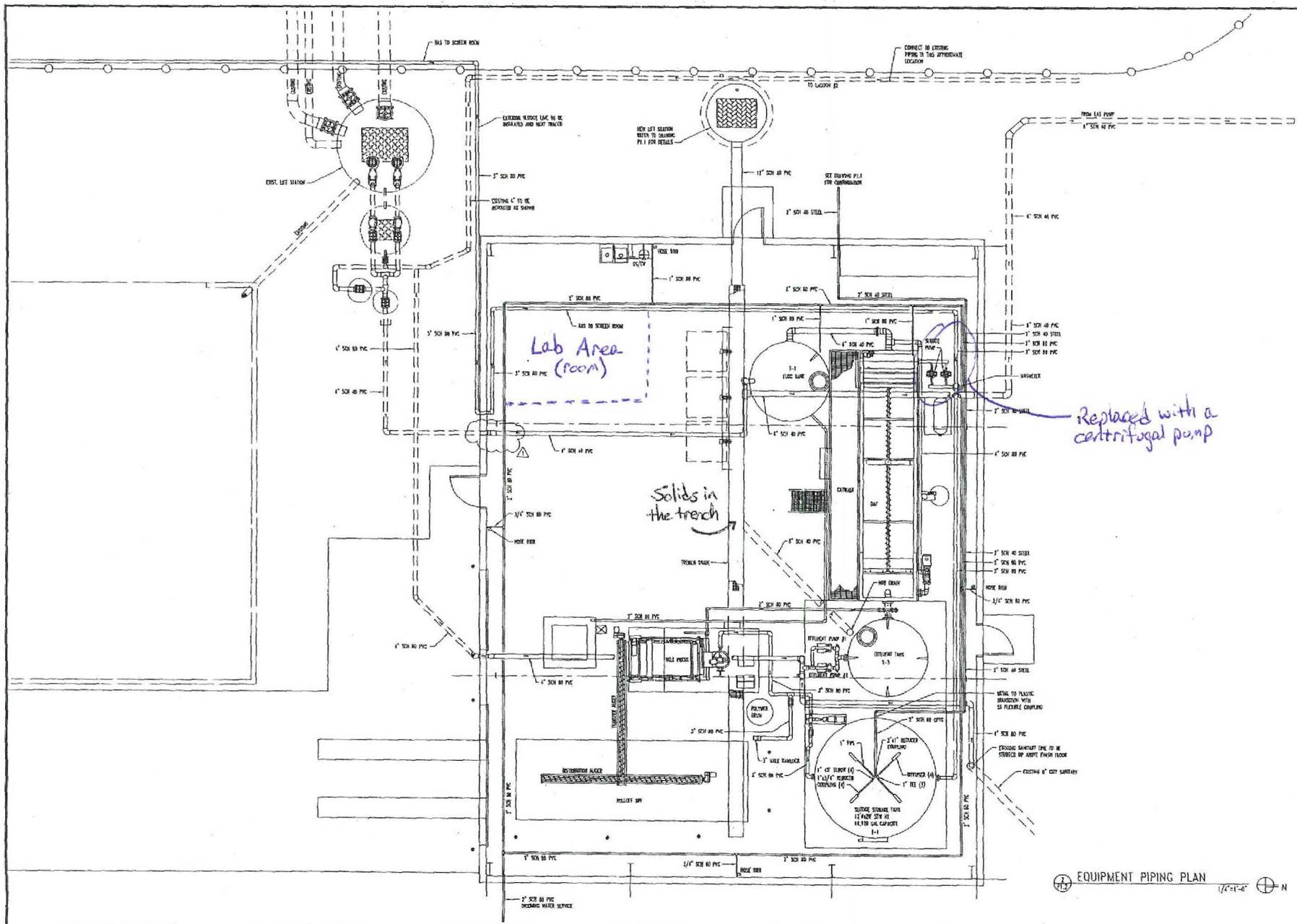
*See inspection letter.*

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**OBSERVATIONS**

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- *The maintenance manual was generated in-house and was scheduled to be reviewed in early May 2012.*
- *Started performing in-house analysis in January 2013 with periodic duplicates sent to Brookside Labs.*
- *It looked like a few diffusors in the treatment lagoon had blown off as evidenced by coarse bubbling and welling-up of water at the diffuser drop. Replacement/repair said to involve two people in a boat.*
- *They switched wastewater treatment chemical suppliers (from Nalco to GE Betz).*
- *Ms. Cotrell obtained 'FactoryTalk ViewPoint' late last summer which allows her to have desktop and remote access to view operational status of the wastewater treatment system.*
- *The DAF effluent looked clear.*



*Replaced with a centrifugal pump*

EQUIPMENT PIPING PLAN 1/8"=1'-0" N

GARMANN  
 MILLER  
 ARCHITECTS  
 ENGINEERS

38 South Lincoln Drive  
 First Office Box 71  
 Mansfield, OH 44888  
 419 825-  
 419 826  
 www.gar

NEW BUILDING FOR  
 ATYS US, INC  
 WASTE WATER PRETREATMENT SYSTEM  
 NORTH COUNTY ROAD 25A  
 ANNA, OHIO



DATE	11/17/05
DESIGNER	CSM
CHECKED BY	CSM
DATE	11/17/05
SHEET NO.	P1.2

**GARMANN**  
**MILLER**  
 ARCHITECTS  
 ENGINEERS

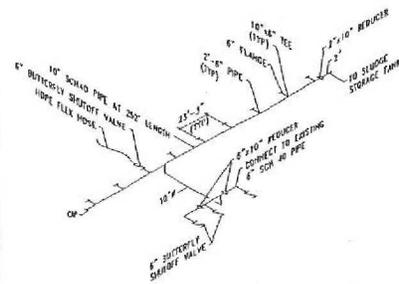
38 South Lincoln Drive  
 Post Office Box 71  
 Moberly, MO 65605  
 417 428 4244  
 417 428 4247  
 www.garmann.com

NEW BUILDING FOR  
**ATYS US, INC**  
 WASTE WATER PRETREATMENT SYSTEM

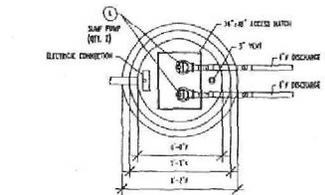
ANNL 0100  
 47 NORTH COUNTY ROAD 25A



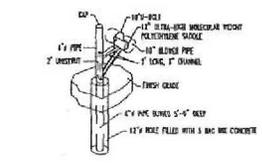
APPROVED  
 INDUSTRIAL WASTE DISPOSAL  
 05-17203  
 11/17/05  
 P.1.1



1.1 BLOWER SYSTEM SCHEMATIC  
 NO SCALE



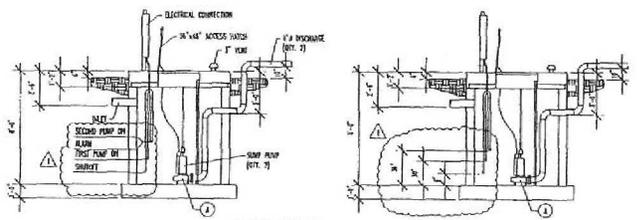
1.2 SUMP DETAIL  
 1/4" = 1'-0"



1.3 BLOWER PIPE SUPPORT  
 NO SCALE

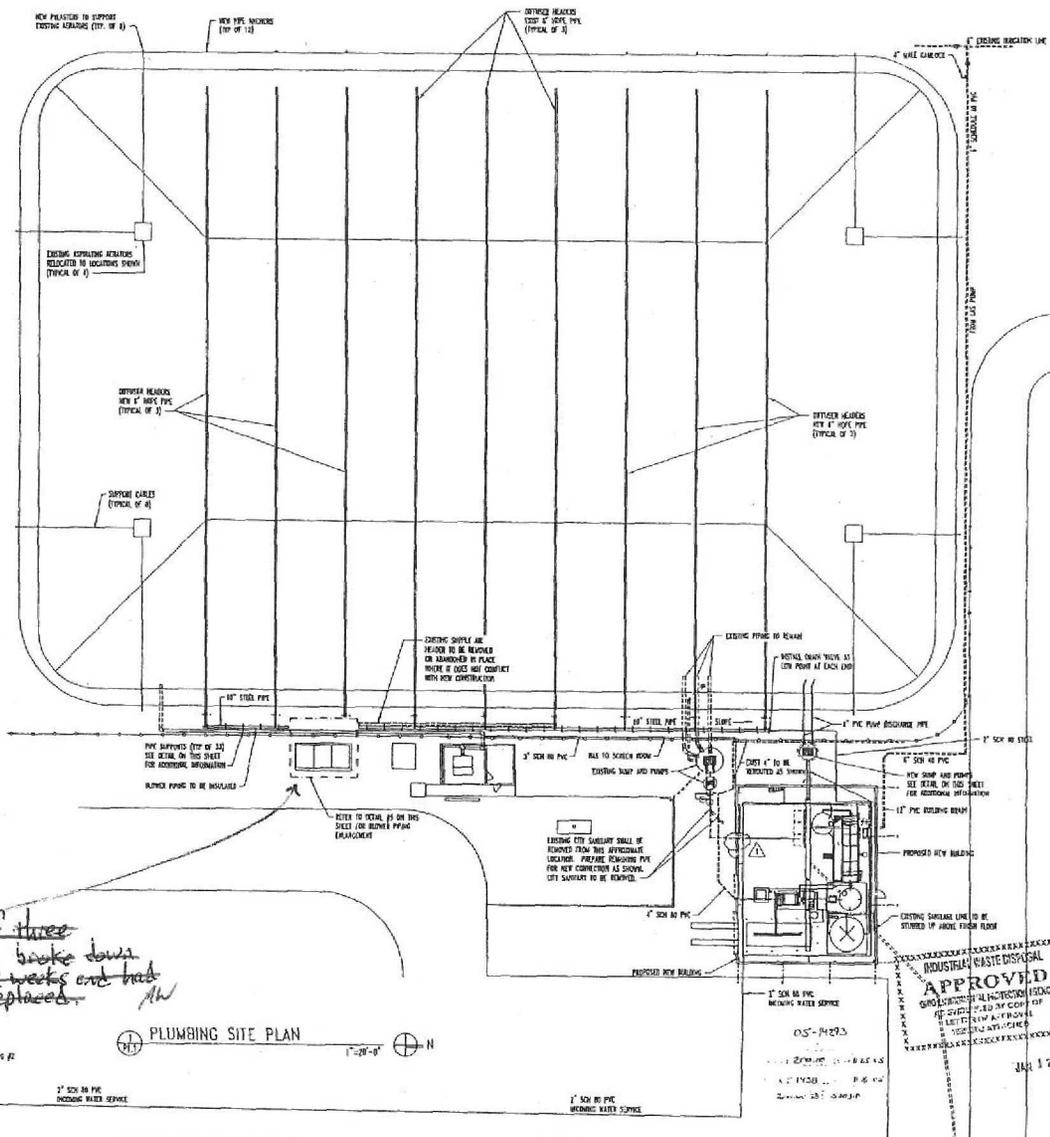
- SUMP PUMP GENERAL NOTES**
1. ALL FOUNDATION AND WORKERS TO BE STAINLESS STEEL.
  2. REINFORCING SHALL CONFORM TO ASTM SPECIFICATION C-418 - PRECAST, REINFORCED, CONCRETE SECTIONS.
  3. JOINTS TO CONFORM TO ASTM SPECIFICATIONS C-418.
  4. PIPE TO MAINTAIN SEAL & GASKET PER ASTM PLS. GASKET MATERIALS IN WAREHOUSE SHALL BE CHECKED TO REQUIRE.
  5. CONCRETE SHALL BE SET 28 DAYS.
  6. FIELD ASBEST FLAMM CHECKS AS REQUIRED FOR PRELIM INSPECTION.

- EQUIPMENT NOTES**
1. SUMP PUMP, MODEL, SERIAL NO., 200 GPM AT 10 FT. HEAD, 1.5 HP, 480V/3PH, 1720 RPM, 2.5 FLA. CASB NON-HAZARDOUS. CASB NON-HAZARDOUS STAINLESS STEEL SHAFT.



1.4 BLOWER ENLARGEMENT  
 1/4" = 1'-0"

*Two of three blowers broke down within 2 weeks and had to be replaced. MW*



1.5 PLUMBING SITE PLAN  
 1" = 20'-0"