



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

Re: **Notice of Violation**
Putnam County
IAMS Company
Pretreatment

July 5, 2013

Mr. Mike George
Health Safety and Environmental Program Leader
Iams Pet Food Manufacturing
3700 State Route 65
P.O. Box 87
Leipsic, Ohio 45856-0087

Dear Mr. George:

On June 27, 2013, an inspection was conducted of the pretreatment system serving IAMS Company in Leipsic. You were present and provided operation and maintenance information regarding industrial wastewater pretreatment discharges to the Village of Leipsic sanitary sewer system. Our inspection included a discussion of the operations and a tour of the treatment facility.

A review of the discharge monitoring reports for November 2011 to June 2013 shows that there have been numerous effluent limit violations. The specific instances of non-compliance are enclosed on a separate sheet. It was noted that a consulting company is going to be brought into the facility in July 2013 to review the treatment process and write a report with recommendations for improving treatment at the facility.

A copy of our completed inspection report is enclosed for your records. If you have any questions, please contact me at (419) 373-3053.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Gierhart".

Ryan Gierhart, P.E., R.S.
Division of Surface Water

/jlm

Enclosures

pc: Kevin Lammon, Village of Leipsic
ec: Ryan Laake, DSW, CO
Tracking

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: The Iams Company
OH Number: OHP000190
Facility Representative:
Mike George

Date of inspection: 6/27/2013
IDP Number: 2DP00057*AP
Inspector(s): Ryan Gierhart

COMPLIANCE

- | | | |
|----|--|-----------|
| 1. | Date of last pretreatment inspection: | 11/9/2011 |
| 2. | Has the facility been in compliance with its permit limits since the last inspection?
If no, explain: Facility has had several oil & grease violations | N |
| 3. | Is the facility in compliance with all other requirements? | Y |
| | Sampling procedures | Y |
| | Reporting (late reporting, failure to report, etc) | Y |
| | Compliance schedules | NA |
| | Submitted BMR and 90 day compliance reports | NA |
| | Any other requirements | 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?
Explain any unresolved actions: | N |

FACILITY OPERATIONAL CHARACTERISTICS

- | | | | | |
|-----|---|---|----|-------------------------------|
| 5. | Number of Employees: 185 | | 6. | Shifts/Day: 2/7 |
| 7. | Production Days/Year: 345 | | 8. | Hours/shift: 12.5 Hour shifts |
| 9. | Any production changes since the last inspection?
If yes, explain: Have added some new vet diets. Facility has added kangaroo and fish meat. | Y | | |
| 10. | General facility description and operations: Manufacture Pet Food that includes dog and cat food. Grinding of frozen meat. Meat is mixed with other ingredients and sent through an extruder then it is bagged and shipped to customers. | | | |
| 11. | Any change in materials used in production since the last inspection?
If yes, explain: Kangaroo and fish meat | Y | | |
| 12. | Any expansion or production increase expected within the next year?
If yes, explain: | N | | |

WASTEWATER TREATMENT

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

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

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

If yes, was a PTI obtained? Y

PTI Number: 735643

Date: 2/3/2010

16. What is the treatment mode of operation? **Continuous**
 If batch, list the frequency and duration:

17. Who is responsible for operating the treatment system?
P & G technical dept.

18. How often is the treatment system checked?
The system is checked daily. An operation checklist has been developed for the system. Profecy computer program being used to track maintenance

19. Is there an alarm system for the system? Y
 Explain: Audio alarm to the main building. System has PLC alarms.

20. Is there an operations and maintenance manual? Y

21. Is an inventory of critical spare parts maintained? Y
 If yes, list: **Spare pumps kept onsite.**

22. Are there any bypasses in the system? N
 If yes, describe the location:

Have bypasses occurred since the last inspection? NA

Was the POTW notified? N/A

WASTEWATER TREATMENT CONTINUED

23. Are residuals or sludges generated?

Y

Method of disposal: **The grease which is collected in the oil/grease holding tank is hauled to the Village of Leipsic weekly by Roberts Sewer Service. The solids that are collected in the surge holding tanks is being pumped out every 3 months by Allied environmental.**

Frequency and amount of disposal: **Weekly ~3000 gallons**

Name of hauler/landfill/disposal facility: **Roberts Sewer Service**

Is any sludge generated subject to RCRA regulations?

N

If land applying sludge, is there a sludge management plan?

N

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: **On normal days the facility averages 12,000 gpd to 15,000 gpd but the 30 day meat room cleaning produces the higher daily average at around 30,000gpd to 40,000 gpd.**

REGULATED PROCESS	SAMPLE LOCATION	WASTEWATER FLOW (GPD)		PRODUCTION DATA (SPECIFY UNITS)	
		Permit	Current	Permit	Current
1. Process Wastewater	Pump Station	59,720			
2.					
3.					
4.					
5.					
6.					
7.					
8.					
9.					
10.					
Total Regulated Process Flow		59,720			
Non-contact Cooling					
Blowdown					
Reverse Osmosis Condensate					
Demineralizer Regeneration					
Filter Backwash					
Compressor Condensate					
Storm Water					
Other Dilute Flows					
Unregulated Flows (provide list)					
Sanitary					
TOTAL FLOW					

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

SELF MONITORING

26. Sample location(s) described in the facility's permit: **Auto sampler is set up on surge tank discharge valve.**

27. Is the facility sampling at the location(s) described in the permit? Y
 If no, describe the actual location:

28. Is the location(s) where the facility is sampling representative? Y
 If no, indicate a representative location:

29. Is the flow measured or estimated? **Measured**

If measured, how often is the meter calibrated? **The flow meter is a mag meter that has been installed for 2 years. Facility is unaware of calibration requirements. The facility should check with the manufacturer on calibration requirements.**

If estimated, describe method of estimation:

30. Is pH monitored continuously? Y
 If yes, how often is the meter calibrated? **Calibrated once a week.**

31. Does the facility collect its own samples? Y
 If no, specify the sample collector:

32. Are appropriate sampling procedures followed? Y

Monitoring frequencies	Y
Sample collection (grab for pH, O&G, CN, phenols, VOCs, hexavalent chromium)	Y
Flow proportioned samples	Y
Proper preservation techniques	N
Sample holding times	Y
Chain-of-custody forms	Y

33. Are samples analyzed in accordance with 40 CFR 136? Y

34. Laboratory conducting analyses: **Alloway**

TOXICS MANAGEMENT

35. Are any listed toxic organics used in the facility? N
If yes, identify organics:
36. Does the facility have a current toxic organic management plan(TOMP)? N
If yes, is it being implemented? N
37. Has the facility had any uncontrolled releases or spills to the POTW since the previous inspection? If yes, please explain: N
38. Does the facility need a spill prevention plan or slug discharge control plan? N
If yes, does the facility have a written plan? N
39. Identify any potential slug load or spill areas: **The pretreatment tanks have secondary containment. The caramel coloring room drain closed and kept locked.**

REQUIRED FOLLOW-UP ACTIONS

Get New Data								
Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2DP00057*BP		001	00556	Oil and Grease, Freon	1D Conc	50	53.	11/1/2011
2DP00057*BP		001	00556	Oil and Grease, Freon	1D Conc	50	92.	11/15/2011
2DP00057*BP		001	00556	Oil and Grease, Freon	1D Conc	50	79.	3/6/2012
2DP00057*BP		001	00556	Oil and Grease, Freon	1D Conc	50	110.	4/17/2012
2DP00057*BP		001	00556	Oil and Grease, Freon	1D Conc	50	74.	5/15/2012
2DP00057*BP		001	00556	Oil and Grease, Freon	1D Conc	50	630.	11/20/2012
2DP00057*BP		001	00556	Oil and Grease, Freon	1D Conc	50	240.	12/11/2012