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

August 27, 2013

RE: HOLMES COUNTY
CASE FARMS
NPDES PERMIT NO. 31H00103
SFY 2013 CEI

Mr. Sammy Cole
General Manager and VP
Case Farms
P.O. Box 185
Winesburg, OH 44690

Mr. Cole:

On July 9, 2013, this writer conducted an inspection of the Case Farms facility in Winesburg, OH. The intent of the inspection was to evaluate stormwater controls and to evaluate the wastewater treatment system. A meeting was held prior to the inspection to discuss stormwater issues and to discuss the previous inspection letter dated February 12, 2013. Present were Lee Pilca Maintenance Manager, Dan Dummermuth, P.E, and Randy Mattison.

A review of the monthly operating reports was also conducted as part of this inspection to determine compliance with the National Pollutant Discharge Elimination System (NPDES) Permit. The permit is a requirement of the Clean Water Act and Ohio Revised Code (ORC) 6111.04 for the discharge of wastewater, and is enforceable under ORC 6111.

Observations
Following are observations and discussions at the time of the July 9, 2013 inspection:

1. The stormwater control system at the site was discussed because of previous observations of heavy sediment leaving the site and because of erosion identified indicating that sediment runoff is an ongoing issue. It was also discussed that the current Stormwater Pollution Prevention Plan (SWP3) is not entirely up-to-date and is in need of amending.

   It was understood that a new truck storage pad was constructed in or about 2010. The truck pad is located on the south side of the property and to the west of the wastewater treatment plant. Starting March 10, 2003, any construction activities that disturb more than one acre requires a general permit from Ohio EPA for construction activities. To the knowledge of this writer, no general permit for construction activities was obtained for the project. Please provide information as to the area of disturbance for the truck pad.

2. Concerns regarding stormwater contamination include the following:

   i. The parking area north of the office and processing plant drains to County Road 160 rather than to lift station 1 or to storm drains as indicated in the SWP3. Runoff rates from the parking area was sufficient to cause erosion of blacktop. Gravel and soil were being transported offsite to area streams.
   ii. It was understood that runoff of Fecal coliform bacteria from the site is a concern. This issue was discussed during the inspection and several sources for manure runoff we identified during the inspection. Case Farms must evaluate the site to identify sources of bacteria runoff and take corrective actions to eliminate the discharge of bacteria.
   iii. Runoff from offsite enters the Case Farms property on the south side. Offsite stormwater adds to the runoff rate from the Case Farms property which increases soil erosion. It is recommended that Case Farms take actions to divert all off-site stormwater from the processing area.
   iv. A containment wall on the north side of the pretreatment building is used to load trucks with grease and other materials to be taken for rendering. An opening in the wall had previously been cut and replaced with a steel plate. The opening must be evaluated to determine if it constitutes secure containment. If necessary, the opening in the containment wall must be sealed with a new concrete section.
   v. A significant amount of contaminated water was identified at the east side of the containment pad adjacent to the pretreatment building. It was understood that the contaminated water was from equipment or truck washing activities. The area drains to a catch basin that then drains directly to a roadside ditch along County Road 160. The discharge of this type of wastewater may be a violation of the NPDES Permit and ORC 6111.04 since it may constitute the unauthorized and unpermitted discharge of wastewater. The use of this area or any other unsecured areas for washing equipment or trucks is prohibited.
   vi. Rolloff boxes east of the pretreatment building were leaking material onto the gravel area. The leaked material can contain many different contaminants since they are used at various locations for the transport and disposal of many types of waste material. The rolloff boxes must be covered at all times when material is not being actively placed in the boxes .
   vii. Several totes of chemicals were identified on the east side of the pretreatment building. What appeared to be quick connecting hoses were also identified. This area is potentially a source of spills to stormwater. The totes of chemicals should be relocated indoors.
   viii. The new truck pad was discharging a significant amount of stormwater to the access road on the south side of the wastewater treatment plant. Significant erosion in the let-down area from the pad and along the access road was identified.
   ix. Spills adjacent to fuel tanks were identified. The fuel tanks were adjacent to the live haul holding area and the truck scales. The spilled fuel is transported offsite during precipitation events.
   x. Grease and/or spilled fuel were identified at the sludge transport pad. It is expected that the petroleum residue was associated with the equipment used to transport sludge to farm fields. The petroleum residues are transported offsite during precipitation events.

xi. The Live Haul Storage Area is a significant source of pollutants, including bacteria. Stormwater and chicken manure that accumulates in the storage area is drug out onto exposed areas by trailers that are stored in the Lie Haul Storage Area. The contaminants then runoff with stormwater during precipitation events.

3. Lift station #4 had recently overflowed sewage onto the ground. The pump station is adjacent to the roadside ditch along County Road 160. Any sewage residue on the pump station structure and the surrounding ground will runoff in to the roadside ditch. The sewage residue was to be removed immediately. The cause of the overflow was to be identified and actions taken to ensure that no overflows would occur in the future.

4. The tanks for wastewater treatment appeared to have pinholes in the sides that permitted wastewater to exit the tanks. This is both an environmental and structural concern. Any corrosion in the sides of wastewater treatment tanks is unacceptable. The tanks must be inspected by trained individuals and appropriate actions need to be taken to repair any areas of corrosion.

5. Florescent bulbs were identified in the rolloff boxes located south of the pretreatment building. This is concern for two reasons:

   i. The bulbs contain a significant amount of mercury that could spill into the rolloff box when the bulbs are broken. The mercury escapes the boxes and is distributed onto the ground as described in Item 2.vi above. In addition, mercury residue in the box can continue to pollute the environment at any location the boxes are used and during transport. Because mercury is a bioaccumulation pollutant, event small about of mercury are a concern.
   ii. Fluorescent light fixtures are a hazardous waste and must be recycled properly. Disposing of the fluorescent bulbs into the solids waste containers and landfills is improper disposal of a hazardous waste. The practice of disposing fluorescent bulbs in the rolloff boxes must be stopped immediately.

   Following are two resources that can be used to properly recycle fluorescent tubes:

   http://epa.ohio.gov/portals/32/pdf/comp.lamp.ballast.list.pdf

   http://epa.ohio.gov/dmwm/home/recycle.aspx

   The first reference is a list of contractors for proper disposal or recycling of fluorescent bulbs. The second reference is a link to Ohio EPA that provides information on fluorescent tube recycling. Case Farms must properly recycle or dispose of fluorescent tubes as a hazardous waste material.

6. In a previous inspection documented in a February 12, 2013 letter, Case Farms does not have sufficient sludge storage capacity to enable the wastewater personnel to properly operate the plant during extensive periods of cold and wet periods. Poor weather conditions can prohibit disposal of dewatered sludge onto farm fields. This may cause the wastewater treatment plant to back solids into the treatment system. Case farms must consider a means to increase sludge storage capacity. One possible option is the construction of a covered storage pad. Be advised that prior to constructing any sludge storage facilities, Case Farms must obtain a Permit to Install from Ohio EPA. In the

event the construction activity will disturb over one acre, a general stormwater permit for construction activities from Ohio EPA is also necessary.

7. In the previous inspection report, it was discussed that periodically, the wastewater treatment system experiences power outages. It was also understood that in the past, lift station #4 has overflowed as a result of power outages. In order to address this concern, we discussed the installation of a backup generator to provide power to the treatment system during outages. As discussed, a generator currently being stored at Case Farms is available for installation. Mr. Mattison indicated that the generator could provide sufficient power to operate the treatment system if necessary. It is recommended that at the time the generator is installed, an autodialer be installed on the system to notify critical personnel that the generator has been activated. .

8. In the previous inspection report, this writer identified concerns with the laboratory facilities used by Case Farms for process control. A list of recommended criteria was provided based on a Level II laboratory as defined by Recommended Standards For Wastewater Facilities, 1997 edition. The list included:

    a. A minimum of approximately 300 square feet of floor space;
    b. The cabinets and shelves selected may be of wood or other durable materials;
    c. Bench tops should be of acid resistant laboratory grade materials;
    d. A laboratory grade sink and drain trap should be provided;
    e. Laboratories should be air conditioned. In addition, separate exhaust ventilation
    f. should be provided;
    g. An analytical balance should be provided. A heavy special-design balance table; which will minimize vibration of the balance, is recommended. It should be located as far as possible from windows, doors, or other sources of drafts or air movements, so as to minimize undesirable impacts from these sources upon the balance;
    h. Reagent water of a purity suitable for analytical requirements should be supplied to the laboratory;
    i. First aid equipment; protective clothing including goggles, gloves, lab aprons, etc. should also be provided;
    j. An eye wash station and safety shower; and
    k. A fire extinguisher.

    To date, this concern has not been addressed. This office continues to recommend that Case Farms upgrade their wastewater laboratory to provide the necessary resources for safe and accurate process testing.

Response Requested

This office request that Case Farms provide a response to this inspection report. The response must address all of the issues outlined above. In particular, Case Farms must evaluate its operations as it relates to stormwater management. The site must be evaluated for possible sources of contamination and actions must be taken to eliminate the potential sources of pollution. An updated SWP3 must be developed in accordance with Part IV of the NPDES Permit. Failure to do so is a violation of the permit and ORC 6111.07.

The response must also include schedules for completing the various actions that will be necessary to address the above concerns. In addition to actions that will be taken, the response must also include a date to submit the updated SWP3. It was understood during the inspection that activities necessary for developing the SWP3 would be initiated immediately, and that the plan would be completed by the end of September 2013. Therefore, the final date for submission of the SWP3 shall not exceed 60 days from the date of this letter.

If you have any questions or comments concerning the enclosed inspection report, please contact this office at (330) 963-1251 or at John.Kwolek@epa.ohio.gov.

Respectfully

John Kwolek
District Engineer
Division of Surface Water
Northeast District Office

JK/cs

cc: Randy Mattison, Wastewater Treatment Plant Operator, Case Farms, Inc

NPDES Compliance Inspection Report

SECTION A: NATIONAL DATA SYSTEM CODING				
Permit #	NPDES #	Inspection Type	Inspector	Facility Type
3IH00103	OH0005487	CEI	S	
Inspection Date	Entry Time	Exit Time	Notice of Violation	Significant Non-Compliance
7/9/2013			No	No

SECTION B: FACILITY DATA	
Name and Location of Facility Inspected	Permit Effective Date
Case Farms of Ohio - Winesburg Rendering Plant	9/1/2012
	Permit Expiration Date
	8/31/2017
Name(s) and Title(s) of On-Site Representatives	Phone Numbers
Randy Mattison	
Name and Title of Responsible Official	Phone Number
Sammy Cole, General Manager	(330) 359-7030

SECTION C: AREAS EVALUATED DURING INSPECTION		
Key: S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated		
S	NPDES Compliance	
M	Operations & Maintenance	
U	Facility Site Review	
N/A	Collection System	
S	Flow Measurement	
S	Receiving Waters	
U	Laboratory	

Comments:

Signatures	
John Kwolek, Inspector Division of Surface Water Northeast District Office	8/27/13 Date

Compliance Data for Case Farms of Ohio - Winesburg Rendering Plant between 1/1/2013 to 9/1/2013

Summary
Permit Effluent Limit Violations: 0
Permit Effluent Code Violations: 1
Permit Effluent Frequency Violations: * 0
Compliance Schedule Milestones Not Entered: 0

Code Violations				
Reporting Period	**Station**	**Parameter**	**Reported Value**	**Violation Date**
July 2013	001	E. coli	AK	7/23/2013

*The facility has 3 missing data reports.

Station	Required Report Period	DMR Received
001	August 2013	No
801	August 2013	No
901	August 2013	No

SECTION D: PERMIT VERIFICATION

(a) Correct name and mailing address of permittee ..... Y
(b) Correct name and location of receiving waters ..... Y
(c) Products and production rates conform with permit application ..... NE
(d) Flows and loadings conform with NPDES permit ..... Y
(e) Treatment processes are as described in permit application ..... Y
(f) New treatment process added since last inspection ..... N
(g) Notification given to State of new, different or increased discharges ..... NA
(h) All discharges are permitted ..... Y
(i) Number and location of discharge points are as described in permit ..... Y

Comments:

SECTION E: COMPLIANCE

(a) Any significant violations since the last inspection ..... N
(b) Permittee is taking actions to resolve violations ..... NA
(c) Permittee has a compliance schedule ..... NA
(d) Permittee is meeting compliance schedule ..... NA

Comments:

SECTION F: OPERATION AND MAINTENANCE

(a) Standby power available ..... N
If yes, what type?
(b) Adequate alarm system available for power or equipment failures ..... N
(c) All treatment units in service other than backup units ..... Y
(d) Operator of Record holds unexpired license of class required by Permit .. Y
Class held: 3
(e) Minimum operator staffing requirements fulfilled ..... NA
(f) Routine and preventative maintenance scheduled and performed ..... NE
(g) Any major equipment breakdown since last inspection ..... NE
(h) Operation and maintenance manual provided and maintained ..... N
(i) Any plant bypasses since last inspection ..... N
(j) Regulatory agency notified of bypasses ..... NA
By MOR ☐ and/or Spill Hotline (1-800-282-9378) ☐
(k) Any hydraulic or organic overloads since last inspection ..... N

Comments:

SECTION GI: SLUDGE MANAGEMENT

a) Sludge management plan (SMP) last audited by Ohio EPA:
Audit Date: NA

b) Sludge adequately disposed ..... Y
Method: FIELD APPLICATION

c) If sludge is incinerated, where is ash disposed of ..... N

d) Is sludge disposal contracted ..... N
Name:

e) Has amount of sludge generated changed significantly ..... NE

f) Adequate sludge storage provided at plant ..... N

g) Any complaints received last year regarding sludge ..... N

h) Is sludge adequately processed (digestion, pathogen control) ..... N

Comments:

SECTION H: SELF-MONITORING PROGRAM

a) Primary flow measuring device operated and maintained ..... Y
Type of device: WIER Device location: EFFLUENT

b) Calibration frequency adequate .....
Date of last calibration:

c) Secondary instruments operated and maintained ..... N

d) Flow measurements equipment adequate to handle full range of flows .... N

e) Actual flow discharged is measured ..... Y

f) Flow measuring equipment inspection frequency DAILY

g) Sampling location(s) are as specified by permit ..... Y

h) Parameters and sampling frequency agree with permit ..... Y

i) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e. continuous monitoring instrumentation, calibration and maintenance records) ..... Y

Comments:

SECTION I: EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall Number	Oil Sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	N	N	N	N	N	N	

Comments:

SECTION M: MULTIMEDIA OBSERVATIONS

a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories ..... Y
b) Do you notice staining or discoloration of soils, pavement or floors ..... Y
c) Do you notice distressed (unhealthy, discolored, dead) vegetation ..... N
d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks ..... N
e) Do you notice any unusual odors or strong chemical smells ..... N
f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities ..... Y

Overflowing pump station, spilled fuel at fueling stations, leakage from rolloff boxes