



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

September 17, 2013

**RE: Peak Foods, Inc.  
Storm Water Compliance Inspection  
Permit 1GR00142\*EG**

Mr. Mark Longendelpher  
Peak Foods, Inc.  
1903 W Main St.  
Troy, OH 45373

Dear Mr. Longendelpher:

On September 4, 2013, I met with Mr. Steve Vogel and you to conduct an industrial storm water inspection. Most notable from the inspection was that a storm water pollution prevention plan (SWP3), required by the industrial storm water general permit Peak Foods obtained coverage under, was not available or known to exist. To remedy this deficiency, it is necessary for you to make arrangements to develop an SWP3 as soon as possible, but not later than December 20, 2013. Please notify me when a final plan is available.

The plan must include a site plan showing the location of all storm sewer catch basins, the routes of storm sewers, the drainage patterns for all areas (including roofs) and the final off-site discharge point(s).

Also, the facility site map that is part of your SWP3 should specifically identify the areas to be inspected – including identification of specific places, areas or pieces of equipment where particular attention is needed. Color-coding or enumerating the areas and indicating their boundaries would enhance the plan and can aid the person responsible for conducting the inspections.

I've attached the sector-specific requirements (Peak Foods is covered by Sector U3) that the SWP3 must address and it is necessary for you to ensure the updated plan includes the required elements for this sector.

Please update the plan by December 20, 2013, and notify me when this action is completed.

Despite the absence of a plan, your facility did not exhibit signs of food ingredients, used in the making of whipped toppings, or waste materials on pavement areas or catch basins around the facility. Roof areas were not assessed. It was my impression that the activity that would seem to have the greatest potential for material to enter the storm

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sewer is the load-out station for CIP wastewater. As such, I believe your SWP3 should focus on this area and activity.

You provided me a copy of a checklist form used to inspect the exterior of the building and the surrounding grounds. The checklist included aspects that would be consistent with what would be developed as part of an SWP3. However, as require by section 4.1 the storm water permit, it is necessary for you to also perform at least quarterly monitoring of storm water discharges from your facility at the beginning of a precipitation event. These inspections are required to be documented.

Please provide a written response to this letter by October 7<sup>th</sup> indicating your plans for addressing the items I have presented. If you have any questions about this letter or the attached inspection form, please call me at (937) 285-6095.

Sincerely,



Matt Walbridge  
Environmental Specialist  
Division of Surface Water

MW/kb

Attachment

# Industrial Storm Water Reconnaissance Inspection Report

Name of facility: *Peak Foods*

Address: *1903 W. Main St.  
Troy, OH 45373*

Permit number: *1GR00142\*EG*

Applicable permit sector: *U3*  
*(SIC Code 2024 –Dairy Products)*

Date of visit: *September 4, 2013*

Time started: *10:00*

Time ended: *11:45*

Facility representative(s): *Mark Longendelpher – (937) 440-0707 ext. 133*

OEPA inspector: *Matt Walbridge*

## SWP3:

- A. Did the facility representative produce an SWP3? ~~Y~~/N /Not requested
- A1. Did it include a site map? ~~Y~~/N NA
- A2. Did it include schedules and procedures for the quarterly routine facility inspections? ~~Y~~/N NA
- A3. Did it include schedules and procedures for the comprehensive annual facility inspection? ~~Y~~/N NA
- A4. Did it include schedules and procedures for the quarterly visual assessment of storm water discharges? ~~Y~~/N NA
- A5. If benchmark monitoring is required, does the SWP3 describe how and when that will be done? ~~Y~~/N/NA

## Comments:

- A1. It does not appear that a plan exists.*
- A2. They otherwise have a site inspection checklist (attached)*
- A3. Inspections occur quarterly.*
- A4. Inspections are not coordinated with storm events*
- A5. Benchmark monitoring does not apply to sector U3*

## Inspection records:

- B. Were inspection records available? ~~Y~~/N

## Comments:

*But not in accordance with the requirements of the permit.*

Site Observations:

- C. Are materials stored exposed to weather? ~~Y~~ N  
If Yes, list materials.

***Ingredient deliveries are inside the building.  
CIP wash water (the first rinse) goes to an outdoor storage tank and then pumped into a tanker and hauled to a hog farmer. The hose used to connect to the tanker is stored on the side of the building with end elevated. There was only minor staining on the pavement.***

- D. Are there any structural storm water management practices used onsite? ~~Y~~ N ~~Not sure~~  
Examples include grassed swales, permeable pavement, inlet filters, detention ponds, engineered wetlands, mulch berms, silt fence, rain gardens .

***I only observed an emergency spill kit near the compactor. It contained a silicon rubber mat that they can throw down over the catch basin if there were to be a rupture of the hydraulic system or if a tank unloading inside the building experienced a major release that got outside the building.***

- E. Number of outfalls from site/number inspected: /

**Unknown, but it looked like there was one or two associated with industrial activity.**

- G. Did any show evidence of pollutants discharged in the storm water? ~~Y~~ N

If yes, describe:

- H. Other observations/comments:

- ***They rent parking lot space to Honda for storage of truck trailers.***
- ***A worker was power-washing a loading dock on the northeast corner of the building. He was just using water and I was told that they do it to keep the dock clean of things like dirt, dust and spider webs.***
- ***CIP wash water is hauled out twice a week.***

## **Part 8 – Sector-Specific Requirements for Industrial Activity**

### **Subpart U – Sector U – Food and Kindred Products.**

You shall comply with Part 8 sector-specific requirements associated with your primary industrial activity and any co-located industrial activities, as defined in Appendix A. The sector-specific requirements apply to those areas of your facility where those sector-specific activities occur. These sector-specific requirements are in addition to any requirements specified elsewhere in this permit.

#### **8.U.1 Covered Storm Water Discharges.**

The requirements in Subpart U apply to storm water discharges associated with industrial activity from Food and Kindred Products facilities as identified by the SIC Codes specified in Table D-1 of Appendix D of the permit.

#### **8.U.2 Limitations on Coverage.**

**8.U.2.1 Prohibition of Non-Storm Water Discharges.** (See also Part 1.1.4) The following discharges are not authorized by this permit: discharges containing boiler blowdown, cooling tower overflow and blowdown, ammonia refrigeration purging, and vehicle washing and clean-out operations.

#### **8.U.3 Additional Control Measures/Best Management Practices (BMPs).**

**8.U.3.1 Employee Training.** (See also Part 2.1.2.9) Address pest control in your employee training program.

#### **8.U.4 Additional SWPPP Requirements.**

**8.U.4.1 Drainage Area Site Map.** (See also Part 5.1.2) Document in your SWPPP the locations of the following activities if they are exposed to precipitation or runoff: vents and stacks from cooking, drying, and similar operations; dry product vacuum transfer lines; animal holding pens; spoiled product; and broken product container storage areas.

**8.U.4.2 Potential Pollutant Sources.** (See also Part 5.1.3) Document in your SWPPP, in addition to food and kindred products processing-related industrial activities, application and storage of pest control chemicals (e.g., rodenticides, insecticides, fungicides) used on plant grounds.

#### **8.U.5 Additional Inspection Requirements.**

(See also Part 4.1) Inspect on a quarterly basis, at a minimum, the following areas where the potential for exposure to storm water exists: loading and unloading areas for all significant materials; storage areas, including associated containment areas; waste management units; vents and stacks emanating from industrial activities; spoiled product and broken product container holding areas; animal holding pens; staging areas; and air pollution control equipment.

## 8.U.6 Sector-Specific Benchmarks. (See also Part 6 of the permit.)

<b>Table 8.U-1.</b>		
<b>Subsector (You may be subject to requirements for more than one Sector / Subsector)</b>	<b>Parameter</b>	<b>Benchmark Monitoring Concentration</b>
<b>Subsector U1.</b> Grain Mill Products (SIC 2041-2048)	Total Suspended Solids (TSS)	100 mg/L
<b>Subsector U2.</b> Fats and Oils Products (SIC 2074-2079)	Biochemical Oxygen Demand (BOD <sub>5</sub> )	30 mg/L
	Chemical Oxygen Demand (COD)	120 mg/L
	Nitrate plus Nitrite Nitrogen	0.68 mg/L
	Total Suspended Solids (TSS)	100 mg/L



An Interstate / Lakeside Company

# Plant Inspection Form #2

QF-142

## Grounds & Exterior

Audited by:

Audit Date:

	PASS	FAIL	
External areas maintained in good order?			
External traffic routes ... maintained?			
Doors & dock seals maintained?			
Waste/waste disposal      Housekeeping?			
WASTE TANK LINE IN GOOD CONDITION ?			
Waste Tank Hose (TYGON) on Hangers?    Outlet Capped?			
Area next to building, free from overgrowth and trash ?			
AREA AROUND TRASH DUMPSTER CLEAN ?			
DRAINS CLEAR AND FREE OF TRASH ?			
Building free from birds nesting ?			
Condition of Building: CRACKS, HOLES etc.?			
PEST CONTROL – No insect infestation noted?			
PEST CONTROL – Bait traps are in place and numbered?			
ALL DOORS CLOSED WHEN NOT IN USE			
Man doors, dock doors, garage doors in good condition ?			
Dock curtains in good condition ?			
No inordinate standing water?			
All equipment stored away from building?			
Barrels stored in fenced area only, must be covered so as not to trap water			
Roof free of trash and debris?			
Roof in good condition with no obvious holes or cracks ?			
DRAINS CLEAR AND FUNCTIONING PROPERLY?			

Comments / Corrective Actions: