



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

September 16, 2013

**RE: ConAgra Foods, Inc.  
Storm Water Compliance Inspection  
Permit 1GR01005\*EG**

Mr. Robert Colvin  
ConAgra Foods, Inc.  
801 Dye Mill Road  
Troy, Ohio 45373

Dear Mr. Colvin:

On September 4, 2013, I met with you to conduct an industrial storm water inspection. The inspection included a review of your storm water pollution prevention plan (SWP3), required inspection records and a tour of your facility.

Most notable from the inspection was the septic condition of the storm water detention basin that receives runoff from ConAgra's facility. It appeared that the cause of this condition was flour from the sifter building entering an adjacent storm sewer catch basin. You informed me that you have since had the contents of the detention basin pumped out and hauled off-site for disposal by Mike's Sanitation. Although you indicated that this condition was likely the result of an isolated mismanagement of flour, I believe it will be important for you to review operations associated with the sifter building to ensure flour does not enter the storm sewer. Signage or placarding notifying employees and contractors not to dispose of flour to the storm sewer would seem warranted and reasonable.

### **Storm Water Pollution Prevention Plan (SWP3)**

ConAgra's SWP3 needs to be updated to reflect the facility expansion and to reflect the sector specific requirements of the current general storm water permit (the current storm water plan references the previous permit). Also, the site plan needs to show 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 inspector.

I otherwise believe the plan can be streamlined to focus on those areas of your facility's operations where industrial activity is exposed to storm water that is discharged to waters of the State. The ingredient receiving stations on the northwest side of the facility, especially the

flour sifter building, are where I saw the greatest opportunity for food ingredients to become exposed to storm water and where special attention and effort is needed.

I provided you the sector-specific permit language at the time of the inspection, and it is necessary for you to ensure the updated plan includes the required elements for this sector (Sector U3).

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

### **Quarterly Visual Assessments**

I did not see that you are performing quarterly visual assessments required by Part 4.1 of the permit. Also, the monitoring records you did have did not appear to include observations of samples of storm water collected in a clear glass jar at the beginning of a precipitation event. It is necessary for you to begin performing this required monitoring.

### **Routine Facility Inspection**

Please consider performing at least monthly inspections (although many facilities inspect weekly) of areas of industrial activity. Creating location-specific checklists based on the nature of the operations, conveyance system, materials and controls present can ensure effective inspections.

### **Building 2 Roof Discharge**

There was a small but steady stream of water coming down from the roof of building #2 through two downspouts. Please investigate the source of this water and report your findings (via email is acceptable) by October 18th.

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 II  
Division of Surface Water

MW/tb

Attachment

# Industrial Storm Water Reconnaissance Inspection Report

Name of facility: *ConAgra Foods*

Address: *801 Dye Mill Road  
Troy, OH 45373*

Permit number: *1GR01005\*EG*

Applicable permit sector: *U3  
(SIC Code 2038 -Canned, Frozen, and Preserved Fruits,  
Vegetables, and Food Specialties )*

Date of visit: *September 4, 2013*

Time started: *12:30*

Time ended: *3:00*

Facility representative(s): *Robert Colvin*

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~~
- A2. Did it include schedules and procedures for the quarterly routine facility inspections? Y / ~~N~~
- A3. Did it include schedules and procedures for the comprehensive annual facility inspection? Y / ~~N~~
- A4. Did it include schedules and procedures for the quarterly visual assessment of storm water discharges ? Y / ~~N~~
- A5. If benchmark monitoring is required, does the SWP3 describe how and when that will be done? Y / ~~N~~ / ~~NA~~

## Comments:

**A. Dated March 4, 2011.**

**A1. Could use more detail to show storm sewer system (catch basins and piping) and the retention pond. Need to update the site plan to reflect the facility expansion and new wastewater pretreatment building. Site plan needs to include roof drainage pattern. Consider adding a key or cross-reference between the site map and the inspection checklist.**

**A2. Done on April 27, 2012 and then again today (9-4-13).**

## Inspection records:

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

## Comments:

**Aside from the one that was performed today, the last one was performed on April 27, 2012.**

**It does not appear that they are performing the quarterly visual inspection during a rainfall event and are not collecting a sample in a clear glass jar to assess the quality of the discharge.**

Site Observations:

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

***Food ingredients are not compatible with exposure to stormwater. There was evidence of fugitive flour from the sifter building getting into a catch basin and the retention pond was septic with what ConAgra now believes was flour (see pictures)***

***Closed Compactor containers are hauled out approximately twice a week.***

- 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.

***The detention pond did not appear to be designed to manage stormwater. Any treatment would likely be incidental.***

- E. Number of outfalls from site/number inspected: 1/ 1

***From what I could see, all industrial stormwater from the site enters the detention basin.***

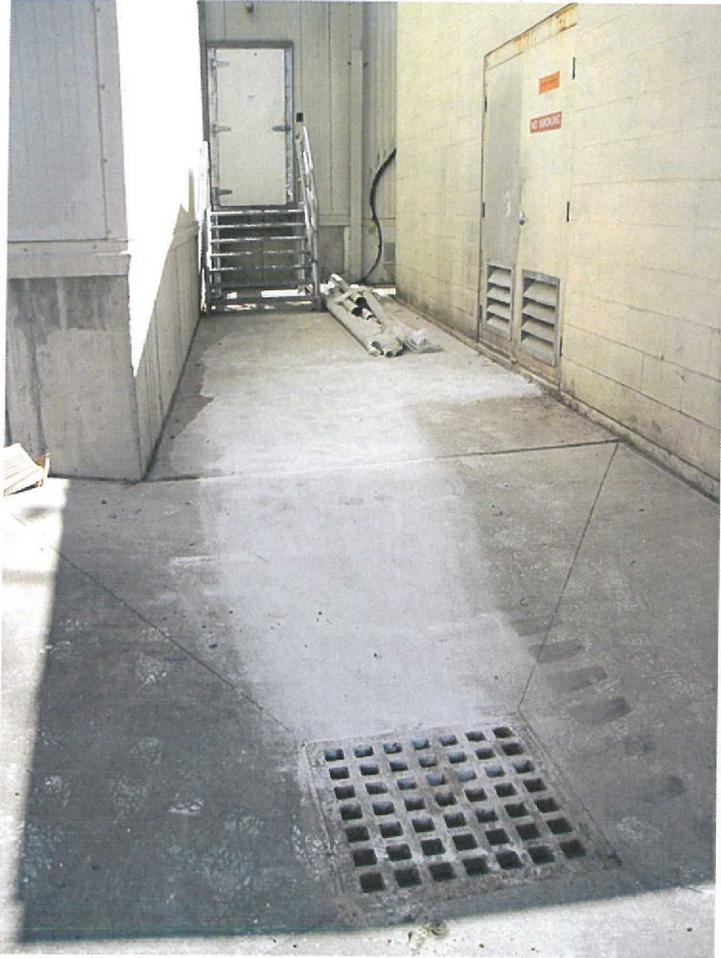
- G. Did any show evidence of pollutants discharged in the storm water? Y / ~~N~~

If yes, describe: ***Flour from sifter building (see picture). Also, water in detention basin was septic.***

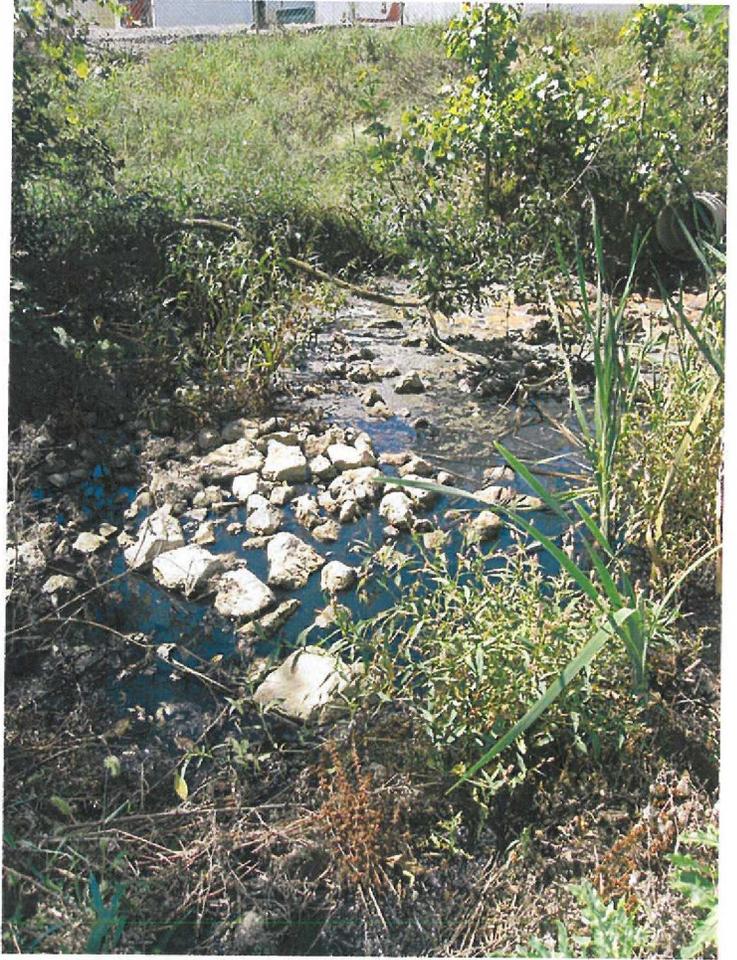
- H. Other observations/comments:

- ***The number of people that are targeted for the annual training could be significantly reduced to only those that actually/reasonably have work activities that involve or influence stormwater.***
- ***Quarterly inspections could be condensed to exclude things like transformers and employee parking lots.***
- ***The downspouts on the east side of building #2 both had a small flow of water coming down from the roof. Need to check out what is on the roof that is contributing this flow; it is likely from cooling towers.***
- ***There was a significant amount of floating grease and meat casings floating on the surface of the sanitary wet well. They would probably benefit from a screen. Setting the float switches so that the water level wasn't allowed so high (the water level was near the inlet pipe elevation) might help, as might pumping the wet well down further.***
- ***A containment pad for drums of used oil is exposed and subject to filling and overflowing. Should be sheltered if possible – otherwise it needs to be included in inspection routine.***

***See pictures below***



*Catch basin next to flour sifter building*



*Detention basin on northeast side of site  
outside the security fence.*



***Black stagnant water in detention basin  
(no flow into basin at the time)***