Ohio | Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Putnam County
IAMS Company
Pretreatment

November 22, 2011

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 November 9, 2011, an inspection was conducted of the pretreatment system serving IAMS Company in Leipsic. You and Aaron Freed, Jedson Engineering, 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 facility.

During the inspection, an upgrade to the treatment system was discussed. The facility wants to run a trial test on adding coagulant and polymer to the treatment system. The purpose of the chemical addition would be to aid the DAF unit in separating the oil and grease from the waste water stream. The facility can perform the trial. If the trial is successful and the facility wishes to continue the use of chemical addition, then a Permit to Install (PTI) needs to be submitted within 180 days from the date of this inspection letter.

A review of the discharge monitoring reports for December 2010 to November 2011 shows that there have been numerous effluent limit violations. The specific instances of non-compliance are enclosed on separate sheets. Hopefully, the actions described above will eliminate the violations. If not, additional steps must be taken to attain consistent compliance.

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,

Ryan Gierhart
Division of Surface Water

/jlm
Enclosures
pc: Kevin Lammon, Village of Leipsic
Ryan Laake, DSW, CO
NWDO DSW-FILE

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402-9398

419 | 352 8461
419 | 352 8468 (fax)
www.epa.ohio.gov

INDUSTRIAL USER INSPECTION CHECKLIST

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

Date of inspection: 11/9/2011
IDP Number: 2DP00057*AP
Inspector(s): Ryan Gierhart

COMPLIANCE

1. Date of last pretreatment inspection: 12/9/10

2. Has the facility been in compliance with its permit limits since the last inspection? N
   If no, explain:

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? N
   Explain any unresolved actions:

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: 181
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? Y
   If yes, explain: Have added some new formulas that had a minimal increase in production.

10. General facility description and operations: Manufacture Pet Food

11. Any change in materials used in production since the last inspection? Y
    If yes, explain: New formulas have caused more quantity of meats to be used.

12. Any expansion or production increase expected within the next year? Y
    If yes, explain: There is potential to add an additional extruder system. Expecting minimal change to wastewater production.

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 utilities and Facilities Dept.

18. How often is the treatment system checked?
    The system is checked daily. An operation checklist has been developed for the system.

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.

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 15,000 gpd to 17,000 gpd but the 21 day meat room cleaning produces the higher daily average.

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 Condenstate					
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 currently out of service samples being taken from pump station at this time. Sampling point is going to be moved to collect the sample from the pretreatment systems final discharge tank prior to sanitary sewer connection.

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? Facility was unaware if meter has been calibrated yet.

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

32. Are appropriate sampling procedures followed?

Monitoring frequencies	Y
Sample collection (grab for pH, O&G, CN, phenols, VOCs, hexavalent chromium)	Y
Flow proportioned samples	Y
Proper preservation techniques	Y
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	190.	12/21/2010
2DP00057*BP		001	00556	Oil and Grease, Freon	1D Conc	50	71.	1/5/2011
2DP00057*BP		001	00556	Oil and Grease, Freon	1D Conc	50	78.	1/12/2011
2DP00057*BP		001	00556	Oil and Grease, Freon	1D Conc	50	124.	1/19/2011
2DP00057*BP		001	00556	Oil and Grease, Freon	1D Conc	50	70.	1/26/2011
2DP00057*BP		001	00556	Oil and Grease, Freon	1D Conc	50	158.	2/1/2011
2DP00057*BP		001	00556	Oil and Grease, Freon	1D Conc	50	92.	2/9/2011
2DP00057*BP		001	00556	Oil and Grease, Freon	1D Conc	50	88.	3/21/2011
2DP00057*BP		001	00556	Oil and Grease, Freon	1D Conc	50	160.	4/5/2011
2DP00057*BP		001	00556	Oil and Grease, Freon	1D Conc	50	160.	5/3/2011
2DP00057*BP		001	00556	Oil and Grease, Freon	1D Conc	50	120.	5/24/2011