

**COMPLIANCE EVALUATION INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5**

Purpose: NPDES Compliance Evaluation Inspection

Facility:

The Kraft Heinz Company
1701 West Bradley Avenue
Champaign, Illinois 61821

Date of Inspection: August 21, 2023

EPA Inspectors:

Val Dooling, Environmental Engineer, (312) 886-7167
Newton Ellens, Pretreatment Program Manager, (312) 353-5562

Illinois EPA Inspectors:

Jeffery Holste, Environmental Protection Engineer
Amelia Allen, Environmental Protection Engineer

Kraft Heinz Representatives:

Heather Conover, Operations Risk Manager
William George, Site Lead
Mickey Frantz, Lead Operations Risk Manager

Urbana and Champaign Sanitary District Representatives:

Rick Manner, Executive Director
Wade Lagle, Director of Operations
Trent Lyons, Laboratory Supervisor

Report Prepared By:

Val Dooling, Environmental Engineer

EPA Inspector Signature and Date:

VALERIE
DOOLING

Digitally signed by
VALERIE DOOLING
Date: 2023.11.13
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Approver Name and Title:

Ryan J. Bahr, Section 2 Supervisor
Water Enforcement and Compliance Assurance Branch

Approver Signature and Date:

RYAN BAHR

Digitally signed by RYAN
BAHR
Date: 2023.11.16
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I. INTRODUCTION

The purpose of the report is to describe, evaluate and document the Kraft Heinz Company's compliance with the Clean Water Act (CWA) and Urbana Champaign Sanitary District's compliance with the CWA and its National Pollutant Discharge Elimination System (NPDES) permit.

II. BACKGROUND

On August 21, 2023, EPA conducted a Clean Water Act Compliance Evaluation Inspection at the Urbana Champaign Sanitary District (UCSD) Northeast Plant located at 1100 East University Avenue in Urbana Illinois 61802 and at The Kraft Heinz Company (Kraft Heinz) at 1701 West Bradley Avenue in Champaign, Illinois 61821, an industrial user of UCSD.

UCSD holds NPDES Permit IL0031500 issued by Illinois Environmental Protection Agency (IEPA) effective October 1, 2020 and expires on September 30, 2025, which authorizes Pretreatment Program General Provision in Special Condition 12. UCSD has determined Kraft Foods is a significant Industrial User and has issued Wastewater Discharge Permit KHF-22-23 to Kraft Heinz. Permit KHF-22-23 states that the User shall comply with all applicable requirements of Sections 501 and 502 of the UCSD Ordinance 678.

III. OPENING CONFERENCE AT UCSD

Inspector Ellens and I arrived at UCSD at 10:00 am and met IEPA Inspectors Jeffrey Holste and Amelia Allen. We entered together and met with UCSD Representatives: Rick Manner, Executive Director; Wade Lagle, Director of Operations; and Trent Lyon, Laboratory Supervisor. Inspector Ellens and I showed our credentials to Mr. Manner.

IV. DISCUSSION AT UCSD

Mr. Lagle explained the following chain of events beginning with Friday August 4th in the afternoon when he noticed the influent at the Northeast Sewage Treatment Plant was darker than normal around 3:00 pm. The events are documented in the memoranda in Appendix D. The influent ammonia concentration began increasing at that time and throughout the evening (Appendix F). At that time the blowers were taken out of automatic and put into manual as well as changes made to the aeration basin to accommodate the higher demand of oxygen and an increase in flow split and recirculation rates. Mr. Lagle stated that due to the adjustments which were made at the plant, the effluent did not exceed NPDES permit limits.

Mr. Lagle recalled that on Monday August 7th he received an email and phone call from the wastewater pretreatment operator at Kraft Heinz, Darin Colter. In that call, the operator stated that over the weekend of July 29th, Kraft's digester had tripped out and been offline causing the digester to go septic. By draining the digester contents into the aeration basin, a previously used hack that was not effective this time, it caused the aeration basin to go septic. Mr. Lagle explained that he

believed the increase in ammonia that the UCSD influent experienced influent was the result of Kraft's septic digester and aerobic lagoon.

The following day, on Tuesday August 8th, Mr. Lagle spoke with Kraft's Operations and Risk Manager, Heather Conover, who confirmed the issues at Kraft Heinz's wastewater treatment plant and explained that Kraft Heinz was working to resolve low dissolved oxygen levels at the aeration basin.

On Wednesday August 9th, Mr. Lagle stated that he drove southeast of the Kraft wastewater plant and did not notice any odor issues.

The next week, on Tuesday August 15th, Mr. Lagle stated that he and Mr. Manner met with Kraft representatives and a consultant with whom Kraft Heinz was working to resolve its pretreatment issues, who provided an update on the pretreatment system. UCSD had received many private citizen odor complaints from the neighborhood south and east of the Kraft Heinz facility, so, prior to the meeting, UCSD drove through the neighborhood southeast of the Kraft wastewater plant and did notice odors. At that time, UCSD opened the first manhole downstream of Kraft's discharge and used a gas detector to determine that no residual hydrogen sulfide was detected in that manhole.

On Thursday August 17, Mr. Lyons stated that he and other UCSD representatives met with Ms. Conover from Kraft to discuss the actions to return the pretreatment system to normal and Kraft's lack of reporting of its pretreatment malfunction.

On Friday August 18, Mr. Lyons stated that UCSD met with Mr. George from Kraft Heinz to discuss the action taken to bring their wastewater pretreatment plant to normal operation and resolve the odor issues in the community. Mr. George stated that temporary foggers have been brought in to reduce odors and temporary aeration would also be brought in to help supply dissolved oxygen to the aeration basin. UCSD emphasized that Kraft needed to make more efforts to reduce loading to their system.

At the time of the inspection, the effective significant industrial user permit for Kraft Heinz is KHF-22-23 issued by UCSD effective October 4, 2022 through October 10, 2023 (Appendix C). This permit states that wastewater discharged to the sewer from Kraft shall not exceed the following discharge limits for ammonia nitrogen.

Pollutant	Monthly average (mg/L)	Daily maximum composite sample (mg/L)	Grab sample maximum (mg/L)	Minimum detection limit (mg/L)
Ammonia Nitrogen	50	100	250	0.1

The permit requires the user to sample and analyze the discharge for biochemical oxygen demand (BOD) and total suspended solids (TSS) on a daily basis and requires the user to semiannually sample and analyze the regulated discharge for all pollutants (including ammonia).

Kraft Heinz most recent semi-annual self-monitoring results were sampled and analyzed in March 2023 and its effluent was in compliance with its permit. In addition to semi-annual self-monitoring requirements, UCSD collects monthly splits of Kraft effluent; the results are listed in Appendix G. Samples collected 7/17/23, 8/1/23, 8/15/23 and 8/16/23 were in compliance with the discharge limits of its permit.

Mr. Manner described the enforcement response that UCSD has had with Kraft. During the inspection, Mr. Manner told me that UCSD had given verbal notice to Kraft Heinz that an enforcement action a compliance plan or penalties, will be issued for this incident. An enforcement action was being prepared and penalties had been discussed with the UCSD legal department. Mr. Manner stated that UCSD wanted to resolve the odor issue affecting the community first rather than require Kraft to respond to the proposed violation from the incident. A mandatory compliance meeting with Kraft Heinz had taken plant between UCSD and Kraft on August 17, 2023. According to Mr. Lyons, during that meeting the following potential violations were discussed:

UCSD noted that Kraft was still operating at or above an average flow of 1 MGD and the wastewater discharging from Kraft had not decreased. While Kraft Heinz's permit authorizes it to discharge an average of 765,000 gallons daily, its actual flow is expected to average 30 MGD in the last 30 days. UCSD stated that the large change in quantity of flow necessitated a notification according to Kraft's permit. At this meeting UCSD mentioned that Kraft's newest lines were added in 2023 and UCSD was not informed of the addition. Mr. Lyons stated that he then went to collect the split composite sample for total sulfides from Kraft's autosampler and noticed that the effluent sampler had stopped collecting samples for the day and had already collected 20 out of 20 aliquots by 3:00 pm. UCSD emailed Kraft to notify them that the effluent composite samples must be representative of the entire 24-hour sample day and the settings on the composite sampler need to be adjusted to be in compliance with its Permit.

Mr. Manner stated that they are still analyzing additional effluent composite samples. All samples collected to date have not exceeded the effluent limits for any parameters. While COD and TSS has been elevated, neither of these exceed the permit. In the future, ammonia nitrogen will be added to Kraft Heinz daily monitoring by a compliance directive.

UCSD has an industrial pretreatment program enforcement response plan, revised in 2013 and is reproduced here in part.

Noncompliance	Circumstances	Typical Range of Response
Failure to notify of spill, slug load, bypass or pretreatment malfunction	No known interference or pass through	Notice of Violation requiring report within 2 weeks.
Minor violation of permit condition	No evidence of negligence or intent	Phone notification, possible NOV
Failure to accurately report non-compliance, such as failure to report a violation discovered as a result of self-monitoring.	At any time	Informal telephone calls, NOV requiring report within 2 weeks.

The Enforcement Response Plan specifies that phone notification should be completed by the pretreatment coordinator as soon as a violation is discovered, maximum of 1 week. A Notice of Violation should be mailed by the pretreatment coordinator as soon as possible, maximum of 1 week unless the industry has been informally informed of the violation, or other responses are under consideration.

EPA and IEPA Inspectors left UCSD at 12:07 pm and proceeded to the neighborhood south and east of the Kraft Heinz facility. At a location two blocks from the facility, Inspectors did not notice wastewater odors.

V. OPENING CONFERENCE AT KRAFT HEINZ

EPA and IEPA Inspectors arrived at Kraft Heinz at 12:48 pm and met with Kraft Heinz representatives: Heather Conover, Operations Risk Manager and Environmental and Health and Safety and Security; William George, Site Lead; and Mickey Frantz, Lead Operation Risk Management of Business Unit TMA (Taste, Meals and Away from Home). Inspector Ellens and I showed our credentials to the three Kraft Heinz representatives. I explained the objectives of the inspection and asked whether anything is considered Confidential Business Information.

VI. DISCUSSION AT KRAFT HEINZ

Mr. George explained that at this facility, 34 lines produce sauces, including mayonnaise and ketchup, dinners and various salad dressing by over 800 employees. Five lines have been in ramp up in the last year with starting dates between May and July 2023. One organic line, which produces a variety of products, opened up three weeks ago. These lines were not additions but had been discontinued and remained vacant until they were recently converted.

All the process lines produce some wastewater. Ms. Conover stated that the line additions had been communicated to UCSD over a year ago, which is the reason that the current permit issued to them from UCSD is for only one year until the changes to wastewater flow can be determined. Ms. Conover stated that there has been an increase in wastewater volume, and she would like to negotiate with UCSD a larger volume of flow into its permit.

I asked about the clean in place (CIP) procedures on the lines and Kraft Heinz Representatives stated that lines can have full cleaning at different frequencies, from every night to once a week. If a line is changing products, such as the organic line frequently does, a full cleaning would happen between product changes. Also, prior to introducing the new lines, the equipment goes through a passivation cleaning process. While the CIP system is used for passivation, the chemicals used are different from those for routine CIP sanitization. Ms. Conover provided me with the safety data sheets for the chemical used for routine CIP sanitization, which contains 30 percent citric acid, and for the chemical used in passivation which contains 10 percent benzalkonium chloride and ethanol.

Ms. Conover explained that production is on 8 hours shifts and at least one division is running full shifts with a sanitation shift occurring on Friday and Saturday. Wastewater is produced during all shifts and flow may increase during the beginning and end of the week. During holidays there is a shutdown period and the wastewater microbiota are fed solids to remain alive. There are six pretreatment operators on three shifts. The shifts are rotating 12 hours shifts. The lead operator has a Class K certification.

Process wastewater flows to the lift stations A1 and E prior to discharge into the pretreatment system. Once the process wastewater has gone through treatment it recombines with sanitary wastewater before being discharged into the municipal sewer system. The pretreatment system has a rotating drum screen, equalization (EQ) tank, dissolved air flotation (DAF) unit, aeration basin, and a clarifier and aerobic digester for sludge.

Ms. Conover stated that the wastewater operator noticed the aerobic digester had turned septic at the end of July. This potentially was due to an electrical failure that caused the blowers to cease for about a day until it was noticed. The operator tried a solution that had previously worked to slowly bleed the contents of the aerobic digester into the aeration basin. At the time, the aerobic basin already had low dissolved oxygen and was not able to handle the ammonia load from the digester. It is possible that the aeration basin was less resilient due to the recent load of passivation chemicals on the new line. Dissolved oxygen (DO) in the aerobic basin went to zero parts per million (ppm), and became septic, and the clarifier contents also turned septic. Ms. Conover stated that she was made aware of the situation at the same time that UCSD received notice from the Kraft Operator on Monday August 7th. At that time a consultant who was already familiar with their pretreatment system, Nalco, was brought in to help repair the pretreatment system and began using a product called SulfX. By August 14, there had not been much improvement in the aeration basin and Kraft was made aware that UCSD was receiving odor complaints from the community. At that time, Kraft reached out to a different consultant, Ramboll, who brought in temporary aeration and at least two tanker loads, or 2600 gallons, of microbiological organisms from UCSD, to increase the healthy microbial population. At the time of the inspection, Ms. Conover stated that Kraft Heinz had started to see some progress, since the water in the aeration basin was now grey in color instead of black and DO reading had increased to 1.59 ppm.

While the wastewater in the aeration basin and clarifier was black from August 4 through the time of the inspection, TSS, COD, BOD and pH were tested at the effluent sample testing point and were within the permit limitations. Kraft Heinz's permit does not require ammonia to be tested every day, so the amount of ammonia was not determined until UCSD requested ammonia testing on August 15th, 2023. All ammonia effluent tests results have been within the permit effluent limits.

On Thursday, August 17th, Kraft Heinz added foggers on the south side of the aeration basin to mask the odors entering the community. According to Mr. Franz, prior to the inspection, in the morning of August 21st, Kraft Heinz had a third party perform air quantification testing for hydrogen sulfide, ammonia, nitric oxide, nitrogen dioxide and volatile organic compounds at the south fenceline of their facility. At the time of the inspection, the official air testing results had not been reported, but they had been made aware of the immediate results. According to Mr. George,

no hydrogen sulfide had been detected. Some nitrogen dioxide had been detected and was being investigated, but all other gasses had zero detects over three passes along the fenceline.

VII. KRAFT HEINZ SITE VISIT

EPA Inspectors, IEPA Inspectors and Kraft Representatives were present for all parts of the Kraft Heinz site visit beginning at 2:28 pm. In the production building called the “East Plant” we all viewed the new line which had received passivation in late July, and the corresponding CIP skid. Then we went to the wastewater pretreatment office, spoke with operators and then viewed each step of the wastewater process.

In the East Plant, we viewed E2 Kitchen, where a food sauce is cooked, and the filling and packaging parts of the line. We viewed a cold kitchen, but Mr. George explained each line has duplicate cold and hot kitchens, to be used depending on whether the recipe requires heat. At this area, production is in eight hour shifts and cleaning begins in the second half of second shift. We viewed the CIP foamer in the kitchen area. During cleanup some wastewater is discharged to the floor drain (Photo 1), but the majority is returned in the CIP cycle and discharged through a pipe to the pretreatment system. The floor drains in the kitchen also discharge to the pretreatment system. Next, we viewed the CIP skid area outside of the production lines (Photo 2). Multiple kitchens in different lines will use the same CIP skid and the same sanitation chemicals.

While near the CIP skid, I saw some older equipment that appeared to be not currently in use. There was an older pump that had white foam on it and appeared to be leaking in the direction of a floor drain (Photo 3). Facility employees stated that this as once used on the mac and cheese line.

We then went to the pretreatment office and spoke with pretreatment employees: Darin Colter, Wastewater Coordinator; Andy Parker, Wastewater Operator; and Travis Howry, Licensed Plumber. Mr. Colter stated that the pretreatment plant was built in 1971. No upgrades have occurred on the pretreatment system since 1991. Mr. Colter stated that there are backup power generators at the lift stations, but not at the pretreatment system; however, the pretreatment system is all gravity fed after the EQ pump, so if the power went out the flow to the municipal sewer would cease. The EQ tank is usually kept half full during the week so there is some capacity and there is a high level alarm that would go off if it were to reach a maximum height.

Internal process control samples for TSS, chemical oxygen demand (COD), pH, and flow are collected at the lift stations, primary influent, return wasting and digester. The permit compliance samples are collected at an autosampler after the process wastewater combines with sanitary. There is a stationary DO meter in the aerobic basin which normally reads around 2-6%, but could occasionally drop for a day or two, according to Mr. Colter.

After the lift station, the first step is for the process wastewater to be collected at a pit with Hycor rotary drum screen (Photo 6), and then sent to the 600,000 gallon aerated EQ tank then to DAF. The EQ tank (Photo 5) was built in 1991 after the original pretreatment unit had already been constructed. Mr. Colter stated that the pace and length of treatment is determined by the pump on the EQ tank that pumps to the DAF unit and the rest of the process is gravity flow, so the length of treatment depends on the amount of treatment that DAF provides. The DAF unit is a circular

shape and has ferric chloride injection. I observed that the wastewater in DAF was an orange-brown color (Photo 7). Mr. Colter explained that the color was typical for the process wastewater due to tomatoes used in processing. All chemicals used in processing and sanitization are approved food grade, so the sludge from DAF goes through a belt filter press (Photo 11) and then can be sold as animal feed at a amount of one truck per day.

After DAF the wastewater is sent to the aeration basin (Photo 12). The aeration basin is approximately 9 feet deep and has a DO probe a few feet down and was reading 0.23 ppm. I noted some vegetation on the banks of the basin and smelled a tomato-like odor. I did noticed a smell of wastewater but not at an overwhelming level. At the time of the inspection the aeration basin was heavily aerated and the surface was rolling, and Mr. Colter explained that it was operating significantly different than the normal operational settings. All seven blowers were running and during normal operation only three would run. There are 15 submersible flight pumps with jet nozzle diffusers and 10 were operating. Mr. Colter stated that 5 were down and had been for a while. One jet nozzle diffuser was lying outside the basin to be repaired (Photo 13). Mr. Colter stated that going forward there is an annual plan to keep up maintenance and he expects the 5 pumps to be repaired within a month, but in the meantime, they were getting rentals. Around the end of July Mr. Colter noted that the aeration basin went from grey to black, but noticed no changes to the influent or effluent sampler. Mr. Colter stated that the aeration basin did not start to “stink” until the week prior.

Water from the aeration basin is discharged through gravity via a weir (Photo 15) to a clarifier. Two clarifiers are present, but one has not been used for decades (Photo 16). I asked whether there were any plans rehabilitate the unused clarifier, and Mr. Colter stated that were getting a company to look into that and that it could be beneficial to have a second clarifier since it could help to slow the flow. One clarifier was in use (Photo 17) and I observed that the water appeared grey and had some solids. There was a small flow coming into the clarifier (Photo 18). Mr. Colter stated that the clarifier water was used as a belt rinse and this was the flow getting returned to the clarifier. Sludge from the clarifier is treated in an aerobic digester which was not observed during the facility site visit. We observed a small sample hut with a flow meter which was used to determine the volume of process flow. The permit compliance samples were collected at a separate location after the treated process wastewater was combined with the sanitary flow. The compliance auto sampler display (Photo 19) indicated that the pump tubing needed to be changed and I observed some discoloration in the tubing.

The facility tour ended at 4:44 pm.

VIII. CLOSING CONFERENCE

EPA began the closing conference at 4:54 pm and noted the following areas of concern:

1. Potential for passthrough or interference

The effective significant industrial user permit for Kraft Heinz is KHF-22-23 states that the User shall comply with all applicable requirement of Section 501 and 502 of the District’s Sewer User Ordinance Number 678.

Article V of the UCSD Sewer Use and Pretreatment Program Ordinance 678 lists Prohibitive Discharge Standards. Section 502 states that No User shall contribute or cause to be contributed, any wastewater which will interference with the operation or performance of the publicly owned treatment works (POTW) or pass through the POTW. Interference is defined in Section 141(b) as a discharge which causes a violation of any requirement of the UCSD's NPDES Permit. Similarly, Passthrough is defined in Section 147 as a discharge which exits UCSD into waters of the United States in quantities or concentration which alone or in conjunction is a cause of a violation of the POTW's NPDES permit.

While UCSD Northeast Plant received an increase in influent ammonia, due to the adjustments which were made, the effluent did not exceed NPDES effluent permit limits.

While Kraft Heinz's compliance samples collected 7/17/23, 8/1/23, 8/15/23 and 8/16/23 were in compliance with the discharge limits in its KHF-22-23 industrial user permit, but at the same time the aerobic basin and clarifier were septic. Therefore, it does not appear that the effluent limits in the KHF-22-23 permit are stringent enough to ensure proper operation of the wastewater pretreatment system.

2. Prohibition against discharge of malodorous substances

The effective significant industrial user permit for Kraft Heinz is KHF-22-23 states that the User shall comply with all applicable requirement of Section 501 and 502 of the District's Sewer User Ordinance Number 678. Article V, Section 502(e) also prohibits a user from contributing the following substances to UCSD's publicly owned treatment works: Any noxious or malodorous liquids, gases or solids which either singularly or by interaction with other wastewater are sufficient to create a public nuisance or hazard to life or which results in the presence of toxic gases, vapors or fumes within the POTW in a quantity that may cause acute worker health and safety problems.

From a period of August 14th through the time of the inspection, over 50 citizen complaints described noxious odors south and east of the Kraft Heinz facility. At the time the complaints were received, UCSD opened the first manhole downstream of Kraft's discharge used a gas detector to determine that no residual hydrogen sulfide was detected in that manhole.

3. Notification of potential slug discharge:

Part IV: Reporting Requirements of KHF-22-23 requires Kraft Heinz, in the case of a discharge of compatible or incompatible pollutants which causes or may cause a violation of Kraft Heinz's Wastewater Discharge Permit or a violation of the regulatory requirement of Ordinance 678, it shall be the responsibility of Kraft Heinz to notify UCSD within 24 hours of becoming aware of the violation. Such discharges include accidental discharges, discharges of a non-routine, episodic nature, a non-customary batch discharge or a slug load. Similarly, the Permit also states that the User shall notify UCSD immediately of any changes at its facility affecting the potential for a slug discharge.

UCSD began noticing increasing ammonia in its influent on August 4th. Kraft Heinz operators noted that the aerobic digester had lost power on July 29th, causing it to turn septic. Kraft Heinz first notified UCSD of issues at its wastewater pretreatment facility on August 7th.

4. Notification concerning changes to wastewater:

Part IV: Reporting Requirement of KHF-22-23 requires Kraft Heinz, in the event the type, quality, or volume of wastewater discharged by Kraft Heinz is expected to change materially and substantially, Kraft Heinz shall give a thirty-day notice in writing to UCSD. UCSD may require Kraft to make a new application to UCSD prior to said change. Kraft shall not materially and substantially change the type, quality, or volume of its wastewater beyond that allowed by this permit without prior approval of UCSD.

Kraft Heinz had notified UCSD over a year in advance that five production lines would start in 2023, since the permit that UCSD issued to Kraft Heinz was only for one year, until the changes to flow had stabilized. According to UCSD, they had not been informed 30 days prior to the start of each of the five new production lines.

5. Increase in flow:

Special Conditions of Permit KHF-22-23 states that Kraft Heinz Foods is hereby authorized to discharge an average of 765,000 gallons of wastewater daily to UCSD.

Kraft has discharged average flow of above one million gallons per day for multiple years since 2013 (Appendix H). In the 30 days prior to the inspection, Kraft actual flow is expected to average one million gallons per day.

6. Representative Sampling:

Part III.1 Monitoring Requirements of KHF-22-23 states that samples taken as a requirement of this permit shall be representative of daily operations. Samples shall be collected, preserved and analyzed in accordance with the requirements prescribed in 40 Code of Federal Regulations (CFR) Part 136 and amendments thereto.

A. WCSD noticed that the split composite sample for total sulfides from Kraft's autosampler and noticed that the effluent sampler had stopped collecting samples for the day at 3:00 pm and had already collected and had already collected 20 out of 20 aliquots.

B. The compliance auto sampler display (Photo 19) indicated that the pump tubing needed to be changed and I observed some discoloration in the tubing.

EPA and IEPA Inspectors concluded the inspection at 5:10 pm and left the facility.

Documents received during the inspection from UCSD:

Memo from Wade Lagle regarding high influent ammonia on Aug 4, 2023
Letter to USEPA regarding Notice of Potential Problems including slug loading on August 21, 2023
Letter to USEPA regarding Immediate Notification from Kraft Heinz on August 21, 2023
Letter to USEPA regarding Repeat sampling event results on August 21, 2023
Letter to USEPA regarding Enforcement Action, Compliance Plan, Penalties Issued on August 21, 2023
UCSD industrial user phone log on August 7, 2023
Memo from Wade Lagle regarding phone call on August 7, 2023
Email from Darin Colter regarding EXTERNAL: basin on August 7, 2023
UCSD industrial user phone log on August 8, 2023
Memo from Wade Lagle regarding phone call on August 8, 2023
Memo from Wade Lagle regarding Kraft Plant drive around on August 9, 2023
UCSD industrial user phone log on August 14, 2023 (2)
Memo from Wade Lagle regarding phone call on August 14, 2023
Memo from Wade Lagle regarding Kraft Pretreatment onsite visit on August 15, 2023
Email from Heather Conover to Wade Lagle regarding Incident at Kraft Heinz on August 16, 2023
Memo and sign in sheet from Compliance review meeting on August 17, 2023 between UCSD and Kraft
Memo from Wade Lagle regarding Kraft onsite sampling collection and effluent sampler from August 17, 2023
Email from Wade Lagle to Heather Conover regarding Kraft combined discharge sampler on August 17, 2023
Memo from Trent Lyons regarding Kraft Pretreatment – video call with William George on August 18, 2023
Chart of Kraft Monthly total flow from January 2017 – July 2023
Chart of Kraft Annual Monthly Average Flow from 2005 -2023
Readout from Station 1 Flow Meter Trend on August 4 – 7, 2023
Readout from Station GG2 – Ammonium Analyzed Level Trend from August 1 – 11, 2023
Readout from Ammonium Analyzed level Trend from August 4 – 7, 2023
Calculated Daily Average Ammonia from August 4 – 7, 2023
Kraft foods combined UCSD permit monthly reporting results for January - December 2022
Kraft foods combined UCSD permit monthly reporting results for January - July 2023
Kraft foods monthly sampling results from January -December 2022
Kraft foods monthly sampling results from January -December 2023
Kraft monthly effluent from January 2021 – August 2023
Kraft Heinz Foods December 2022 analyses local limits analysis
Kraft semiannual reporting on March 6, 2023

The Kraft Heinz Company
Champaign, Illinois
CEI Inspection - August 21, 2023

Kraft semiannual reporting on August 16, 2022
Total suspended solids sampling from Kraft basin on Dates 215 – 218
UCSD Sewer Use and Pretreatment Program Ordinance 678
UCSD Annual Inspection of Kraft Heinz Foods on December 12, 2022
Permit KHF-22-23 issued to Kraft Heinz Foods on October 4, 2022
UCSD Industrial Pretreatment Program Enforcement Response Plan
Industrial User Permit Application from Kraft Foods on September 15, 2022

Documents received during the inspection from Kraft Heinz:

Safety Data Sheets for Liquid Citric Acid 50 Percent Cleaning Product
Safety Data Sheets for Ster-Bac Sanitizer
Spill Response Plan
Facility Site Maps

Appendix A: Inspection Photo Log

Kraft Heinz Company
EPA Inspection August 21, 2023
All photos taken by Newton Ellens, Pretreatment Program Manager, U.S. EPA
Camera: Canon PowerShot SX230 HS



1: IMG_0382

Description: E2 Kitchen floor drain. A CIP foam sanitizer system is present in each kitchen and during cleanup some wastewater is discharged to the floor drain.

Location: East Plant Production Kitchen

Date/Time: August 21, 2023 2:47 PM



2: IMG_0383

Description: Clean in Place (CIP) skid. This CIP is used for the E2 Kitchen in Photo 1 and for other kitchens. Conductivity meter on the skid determine reuse cycle. The passivation chemicals are in the 50 gallon barrels next to the CIP skid and are added during the passivation process.

Location: East Plant

Date/Time: August 21, 2023

2:52 PM



3: IMG_0384

Description: Pumps and equipment in storage near the CIP units. I saw a white foamlike dried residue which left a trail in the direction of the floor drain.

Location: East Plant

Date/Time: August 21, 2023

2:58 PM



4: IMG_0385

Description: Temporary foggers which are set up south of the aeration basin to help mitigate the odor complaints. I smelled a scented spray which was misted from the fogger at the time of the inspection. Ms. Conover stated that it was an apple cider vinegar product which is designed to mask the odor.

Location: Pretreatment Aeration Basin

Date/Time: August 21, 2023 3:46 PM



5: IMG_03876

Description: Aerated 600,000 gallon equilization tank was built in 1991 after the original pretreatment unit had already been constructed.

Location: Wastewater Pretreatment Plant

Camera Direction:

Date/Time: August 21, 2023

3:56 PM



6: IMG_0387

Description: View inside of Pumphouse 4. The elevated white cube on right is wastewater pit with Hycor rotary drum screen.

Location: Wastewater Pretreatment Plant

Date/Time: August 21, 2023 3:56 PM



7: IMG_0388

Description: View inside the circular DAF unit with skimmer. I observed the DAF was an orange-brown color due to tomatoes used in processing.

Location: Wastewater Pretreatment Plant

Date/Time: August 21, 2023 4:00 PM



8: IMG_0389

Description: Two drains under the DAF unit are main and overflow pipes.

Location: Wastewater pretreatment System

Date/Time: August 21, 2023 4:03 PM



9: IMG_0390

Description: Small sampler attached to the DAF is designed to collect in a constant overflow. The sampler does not work, but internal process samples are still collected at the DAF location.

Location: Wastewater pretreatment Plant

Date/Time: August 21, 2023

4:04 PM



10: IMG_0391

Description: Pipe leading to the belt filter press where the DAF sludge is thickened. There was small amount of liquid dripping under the pipe. Mr. Colter stated that it was from a constant flow on the pump seal.

Location: Wastewater Pretreatment System

Date/Time: August 21, 2023 4:04 PM



11: IMG_0392

Description: Thickened DAF solids travel to a tanker truck and are sent out as animal feed. The blue belt thickener is on middle right of the photo with orange-brown sludge solids.

Location: Wastewater Pretreatment System

Date/Time: August 21, 2023 4:07 PM



12: IMG_0393

Description: The aeration was fully aerated and I observed the surface of the water was rolling. I observed the basin had grey water with floatable solids at the time of the inspection.

Location: Wastewater pretreatment system

Date/Time: August 21, 2023 4:19 PM



13: IMG_0394

Description: Submersible jet diffuser sitting on the bank of the aeration basin. The diffuser had been removed from the aeration basin and taken out of service for repair.

Location: Wastewater treatment plant

Date/Time: August 21, 2023 4:20 PM



14: IMG_0395

Description: Stationary DO meter installed a few feet deep at the aeration basin. The DO meter was reading 0.23 ppm at the time of the inspection.

Location: Wastewater pretreatment plant

Date/Time: August 21, 2023 4:23 PM



15: IMG_0396

Description: Weir overflow at the aerobic basin which is gravity discharged to the clarifier. The manual valve is open in this photo. I observed some floatable solids and discolored foam at the point of discharge.

Location: Wastewater pretreatment system

Date/Time: August 21, 2023 4:25 PM



16: IMG_0397

Description: Unused clarifier with sitting water and green plant growth.

Location: Wastewater pretreatment system

Date/Time: August 21, 2023 4:29 PM



17: IMG_0398

Description: Clarifier full of wastewater which had been discharged from the aerobic basin. I observed the water in the clarifier was grey with floatable solids.

Location: Wastewater ptreatment system

Date/Time: August 21, 2023 4:330 PM



18: IMG_0399

Description: A small flow coming into the side of the clarifier. Mr. Colter stated that the clarifier water was used as a belt rinse and this was getting returned to the clarifier.

Location: Wastewater pretreatment system

Date/Time: August 21, 2023 4:33 PM



19: IMG_0400

Description: Autosampler for collecting compliance samples that consist of combined process and sanitary wastewater. Autosampler display stated to change the pump tube. The refrigeration temperature was reading 1°C.

Location: Wastewater pretreatment system

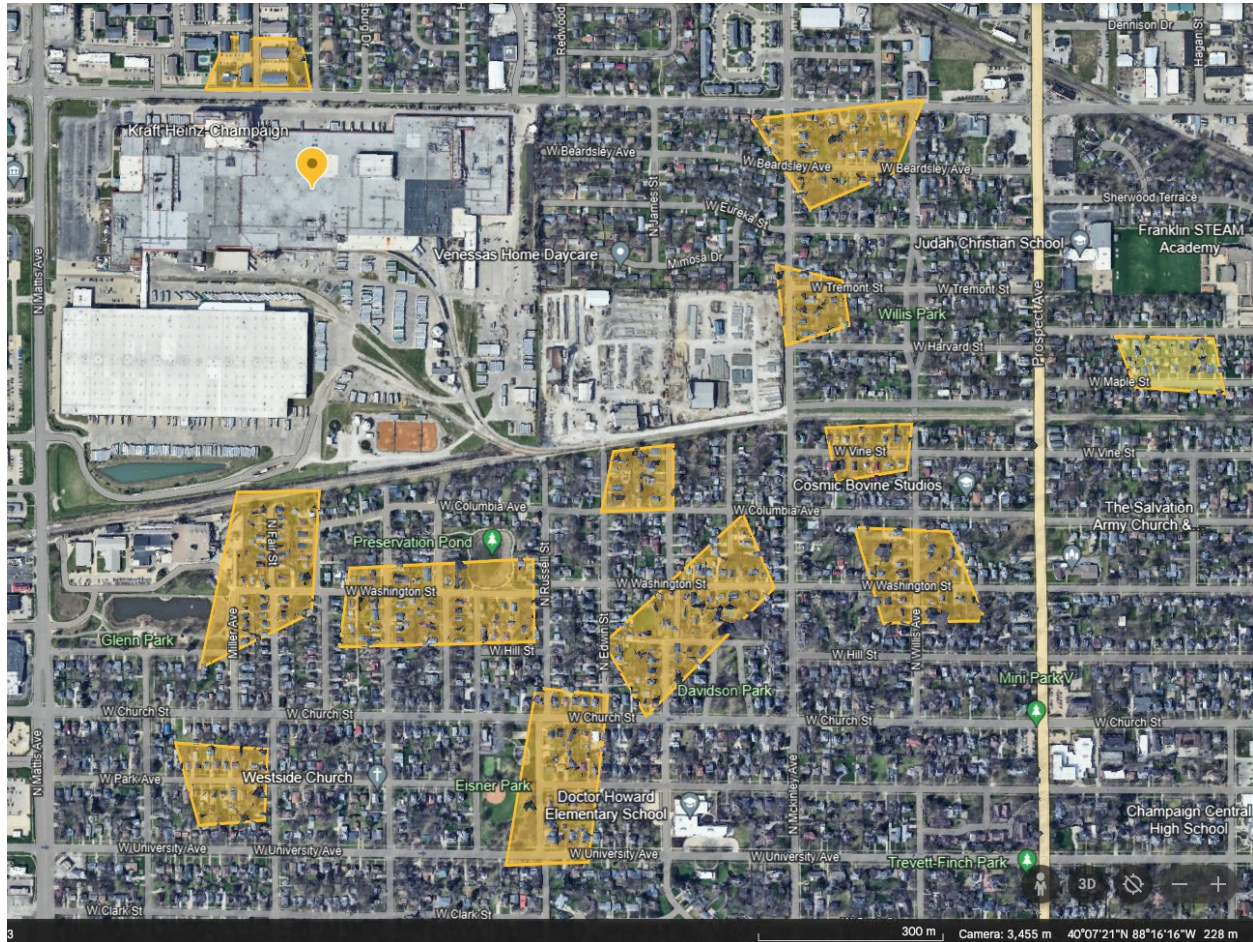
Date/Time: August 21, 2023 4:42 PM

Appendix B: Aerial images of Kraft Heinz

Note: Aerial images collected from Google Earth on October 13, 2023. Google Earth attributes the image collection as April, 6, 2023. Images do not represent conditions observed and are only to be used as reference.



Aerial Image 1: Shows the wastewater pretreatment system at Kraft Heinz.



Aerial Image 2: Shows Kraft Heinz facility and yellow areas which are rough approximations of the locations of at least 50 private citizen odor complaints sent to UCSD starting around August 14, 2023 through August 21, 2023. Most of the private citizen complaints are located within one mile radius to the south and east of the Kraft Heinz facility and bordered by Prospect Street on the east, Springfield Avenue on the South, Mattis Avenue on the west and Bradley Avenue in the north.

Appendix C: Kraft Heinz Significant Industrial Permit issued by UCSD



**URBANA & CHAMPAIGN SANITARY DISTRICT
INDUSTRIAL WASTEWATER DISCHARGE PERMIT
Significant Industrial User**

Permit Number: KHF-22-23

PART I - GENERAL

Name: **Kraft Heinz Foods Company**
SIC Codes: 2022, 2035, 2098
NAICS Codes: 311513, 311824, 311941
Facility Address: 1701 West Bradley Avenue
Champaign, IL 61821

SPECIAL CONDITIONS

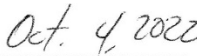
Kraft Heinz Foods is hereby authorized to discharge an average of 765,000 gallons of wastewater daily to the Urbana & Champaign Sanitary District subject to User's compliance with the terms and conditions in this permit.

Effective Date: October 4, 2022

Expiration Date: October 10, 2023



Richard F. Manner
Executive Director



(Date)

PART II - DISCHARGE LIMITATIONS

1. The Urbana & Champaign Sanitary District recognizes Kraft Heinz Foods as a locally regulated Significant Industrial User (SIU).
2. KHF101 - Discharge from the pretreatment system at the southern edge of the Kraft Heinz complex. The sampling point is SW of their aeration tank at the sampling hut.
3. Wastewater discharged to the wastewater collection system from KHF101 outfall shall not exceed the following effluent limitations:

TABLE 1 – DISCHARGE LIMITS

	Pollutant	Monthly average mg/l	Daily maximum Composite sample mg/l	Grab sample maximum mg/l	Minimum detection limit mg/l
1.	Total Arsenic	1.0	2.0	5.0	0.05
2.	Total Cadmium	0.1	0.2	0.5	0.005
3.	Chromium (Hex)	0.5	1.0	1.0	0.01
4.	Total Chromium	5.0	10.0	25.0	0.01
5.	Total Copper	2.0	4.0	10.0	0.01
6.	Total Cyanide	1.2		2.4	0.01
7.	Total Lead	1.0	2.0	5.0	0.05
8.	Total Mercury	0.0005	0.0010	0.0025	0.0002
9.	Total Nickel	2.1	4.2	10.5	0.02
10.	Total Selenium	5.0	10.0	25.0	0.02
11.	Total Silver	1.0	2.0	5.0	0.01
12.	Total Zinc	5.0	10.0	25.0	0.05
13.	BOD ₅	400	800	2000	3
14.	TSS	500	1000	2500	3
15.	Ammonia Nitrogen	50	100	250	0.1
16.	Total FOG	100		100	6
17.	Non-Polar FOG	50		50	6
18.	pH range			6.0 - 12.0 su	0.1

PART II - DISCHARGE LIMITATIONS, continued

4. The discharge shall contain no floatable fats, oils, or grease of any origin.
5. The User shall comply with all applicable requirements of Sections 501 and 502 of the District's Sewer Use Ordinance Number 678.
6. An exception to the mercury limit shall be allowed if all of the conditions specified in Section 307.1102 (c) of 35 Ill. Adm. Code are met. In such cases, the limit shall be 0.003 mg/l and it is a monthly average value. Exemptions are granted annually in December.

PART III - MONITORING REQUIREMENTS

1. Samples taken as a requirement of this permit shall be representative of daily operations. Samples shall be collected, preserved and analyzed in accordance with the requirements prescribed in 40 CFR Part 136 and amendments thereto.
2. The User is required to operate and maintain a sampling station capable of monitoring the discharge prior to the point of entry to the publicly owned treatment works (POTW). The sampling station shall contain the necessary equipment to obtain a 24-hour time proportioned composite sample. It shall be accessible to District personnel per Article V, Section 708(j). The sampling station is located on the process wastewater line at the southwestern area of the property.
3. The User is required to sample and analyze the discharge for BOD and TSS on a daily basis. The daily sample for BOD and TSS shall be an automatic composite of the wastewater discharged. BOD may be calculated using a BOD to COD ratio established and approved by UCSD. The BOD to COD ratio will be adjusted as necessary and at UCSD's discretion. The daily sample for pH shall be a grab sample.
4. The User is required to semiannually sample and analyze the regulated discharge for all pollutants listed in PART II, TABLE 1. The sample shall be a representative composite of the wastewater discharged for all the pollutants except pH, Cyanide, and FOG (total and non-polar) which shall be grab samples.
5. All analyses required by this permit shall be performed either by an independent District approved laboratory or by the User's own laboratory facility and staff. Users who plan to use their laboratory must certify their laboratory with UCSD prior to submitting results.
6. Flow shall be monitored with continuous readout and recording capabilities. The flows shall be submitted on a monthly basis with the regular monthly report unless otherwise approved by the District. Flow measuring equipment shall be calibrated at least annually and the calibration record must be sent to the District annually.

PART IV - REPORTING REQUIREMENTS

1. Immediate Notification: In the case of a discharge of compatible or incompatible pollutants which causes, or may cause a violation of the User's Wastewater Discharge Permit or violation of the regulatory requirements of Ordinance 678, it shall be the responsibility of the User to notify the District within 24 hours of becoming aware of the violation. Such discharges include, but are not limited to, accidental discharges, discharges of a non-routine, episodic nature, a non-customary batch discharge, or a slug load. The notification shall include: name of caller, name of User, location and time of discharge, type of wastewater, and concentration and volume.
2. Written Report: Within five (5) days following the incident the User shall submit to the Executive Director a detailed written report describing the cause of the discharge and the measures to be taken by the User to prevent similar future occurrences. Follow-up reports may be required by the District as needed. Such report, or reports, shall not relieve the User of any expense, loss, damage or other liability which may be incurred as a result of damage to the POTW, fish kills, or any other damage to person or property; nor shall such report relieve the User of any fines, civil penalties, or other liability which may be imposed by this Ordinance or otherwise. Failure to report these discharges may, in addition to other remedies available to the District may result in the revocation of this permit.
3. If sampling indicates a violation, the User shall repeat the sampling and analysis and submit the results of the repeat analysis to the District within 30 days after becoming aware of the violation. Resampling is not necessary if the District performs sampling at the User between the time when the User performs its initial sampling and the time when the User receives the results of this sampling. Note that additional resampling may be necessary to avoid significant noncompliance as defined in Section 825(f) of UCSD Ordinance 678.
4. In the event the type, quality, or volume of wastewater discharged by the User is expected to materially and substantially change as reasonably determined by the User or the District, the User shall give a thirty (30) day notice in writing to the District. The District may require the User to make a new application to the District prior to said change. The User shall not materially and substantially change the type, quality or volume of its wastewater beyond that allowed by this permit without prior approval of the District.
5. Analytical data from a contract laboratory shall be forwarded to the District by email upon receipt. A paper report including all daily and monthly monitoring activity shall be submitted by postal mail and received by no later than the 15th day of the following month. Semiannual monitoring data shall be submitted upon receipt and by no later than June 30 and December 31 of the current year.
6. Bypass means the intentional diversion of wastestreams from any portion of an Industrial User's treatment facility. Further information can be found in 40 CFR 403.17(c) and reporting is required.

PART IV - REPORTING REQUIREMENTS, continued

- a. If the User knows in advance of the need for a bypass, it shall submit prior notice to the District, if possible at least ten (10) days before the date of the bypass.
- b. User shall submit oral notice of an unanticipated bypass that exceeds applicable Pretreatment Standards or local limits to the District within 24 hours from the time the User becomes aware of the bypass. A written submission shall also be provided within five (5) days of the time the User becomes aware of the bypass. The written submission shall contain a description of the bypass and its cause; the duration of the bypass, including exact dates and times, and, if the bypass has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the bypass.

Bypass is prohibited and the District may take enforcement action against the User for a bypass, unless;

- c. Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
- d. There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventative maintenance; and
- e. The User submitted the notices as required in (6)(a) and (6)(b) above.

The District may approve an anticipated bypass, after considering its adverse effects, if the District determines that it will meet the three conditions, (6)(c) to (6)(e) above.

7. Upset means an exceptional incident in which there is unintentional and temporary noncompliance with categorical Pretreatment Standards or local limitations because of factors beyond the reasonable control of the User. An Upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

User must submit the following information to the District within 24 hours of becoming aware of the Upset and provide a written submission within five (5) days.

- a. A description of the Indirect Discharge and cause of noncompliance;
- b. The period of noncompliance, including exact dates and times or, if not corrected, the anticipated time the noncompliance is expected to continue.
- c. Steps being taken and/or planned to reduce, eliminate, and prevent recurrence of the noncompliance.

PART V - GENERAL CONDITIONS

The Urbana & Champaign Sanitary District's Sewer Use Ordinance Number 678 is the legal authority for this permit and the District's pretreatment program.

1. Records Retention.

- a. The User shall retain and preserve, for no less than three (3) years (including documentation associated with Best Management Practices), any correspondence, records, books, memoranda, reports, documents, and any and all summaries thereof relating to monitoring, sampling, and chemical analyses made in connection with its wastewater discharge. These materials shall be made available to the District, IEPA, and USEPA upon request.
- b. All records that pertain to matters that are the subject of administrative adjustment or any other enforcement or litigation activities shall be retained and preserved by the User until all enforcement activities and related review proceedings have concluded and all periods of limitation with respect to any and all appeals have expired. Records of any contractor or agent of the User must be retained by the User.

2. Right of Entry. The User is required to allow District representatives, the Illinois Environmental Protection Agency, the United States Environmental Protection Agency, or their representatives, ready access upon presentation of credentials at reasonable times to all parts of its premises in which a discharge source or treatment system is located or in which records required by this Ordinance and are kept for the purposes of inspection, sampling, examination and photocopying of said records and for the performance of any of their duties.

3. Dilution. No User shall increase the use of process water or, in any way, attempt to dilute a discharge as a partial or complete substitute for adequate pretreatment to achieve compliance with the limitations contained in the National Categorical Pretreatment Standards (NCPS) (when effective), or in any other pollutant specific limitation developed by the District or State.

4. Violations. The permit issued by the District may be revoked when, after inspection, monitoring or analysis it is determined that the discharge of wastewater to the sanitary sewer is in violation of Federal, State, or local laws, ordinances, or regulations. Additionally, falsification or intentional misrepresentation of data or statements pertaining to the permit application or other required reports may be cause for permit revocation.

5. Confidential Information. Except for information determined to be confidential under Section 736 of the District's Sewer Use Ordinance Number 678, this permit and all information pertaining to this permit shall be available for public inspection at the District's office.

6. Wastes. Waste generated by the User which is not discharged to the District's POTWs shall be disposed in accordance with Section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.

PART V - GENERAL CONDITIONS, continued

7. Limitations on Permit Assignment and Transfer. Permits are issued to a specific facility for a specified operation and are not assigned to another use or transferable to any location without the prior written approval of the District. Sale of a facility shall obligate the new owner or operator to seek prior written approval of the District for continued discharge to the sewer system. The User shall furnish a copy of the current permit to the buyer. Buyer must apply for a temporary permit.
8. Permit Reissuance. The District shall notify a User One Hundred and Eighty (180) days prior to the expiration date of the User's permit. Within Ninety (90) days of the notification, the facility shall apply for reissuance of the permit on a form provided by the District.
9. Modification or Revision of Permit. The permit issued to the facility may be subject to modification during the term of the permit, as limitations or requirements in the District's ordinance are changed. The User shall be notified of any changes in the permit thirty (30) days prior to the effective date of the change.
10. Civil and Criminal Penalties. Any person who violates Ordinance 678, orders authorized by Ordinance 678, or this permit shall be liable for any damage to the District. Upon conviction of such violation, the person(s) responsible for the violation shall forfeit not less than One Thousand ~~(\$1,000.00)~~ Dollars for each violation, together with the costs of prosecution. Each day a violation continues shall be deemed a separate offense.
11. Notice of Potential Problems, including Slug Loadings. The User shall notify the District immediately of any changes at its facility affecting the potential for a slug discharge.
12. Recording of Results. For each measurement or sample taken pursuant to the requirements of this permit, the User shall record the following information:
 - a. Exact place, date, and time of sampling;
 - b. The dates the analyses were performed;
 - c. The person(s) who performed the analysis;
 - d. The analytical techniques or methods used and the result.
13. Severability. Should any section, clause, sentence or provision in this Wastewater Discharge Permit be declared by a court of law to be invalid or unconstitutional, such determination shall not affect the validity of any other section, clause, sentence or provision of this permit which can be given effect without such invalid part or parts, as every section, clause, sentence and provision of this permit is deemed severable.
14. Signatory Requirements. All reports required by this permit shall be signed by an authorized representative of the User.
15. Pollutant Waiver. The District is not issuing pollutant waivers. This includes all local limitation pollutant parameters. Pollutants regulated by a categorical Pretreatment Standard must be sampled for, analyzed, and will not be given a waiver.

Appendix D: Memoranda of activity by UCSD Representatives

Memorandum

To: Kraft Pretreatment File
CC: Trent Lyons
From: Wade Lagle
Date: August 4, 2023
Subject: Northeast Plant – high influent ammonia

I noticed the influent was darker than normal at the RV dump around 3:00pm. The influent ammonia concentration at the GG2 ammonium analyzer had also been trending upwards throughout the afternoon.

The ammonia concentration continued to trend upwards throughout the evening. After speaking with the second shift operator who was having issues with the blower/dissolved oxygen levels, I decided to come in and take a closer look at plant processes.

The blower was put in hand mode of operation and additional changes were made to the aeration basin settings to accommodate the higher demand of oxygen. Also, there were changes made to other areas within the with regards to flow splits and increased recirculation rates.

Memorandum

To: Kraft Pretreatment File
CC: Trent Lyons
From: Wade Lagle
Date: August 7, 2023
Subject: Kraft Pretreatment – Operator phone call

Today at 3:20pm I spoke with Darrin Culter regarding the email he sent to you at 11:55am.

Darrin explained that over the weekend of July 29th, the digester blower had tripped out and been offline for several days. He said the digester contents had gone septic and he had drained the contents into the aeration basin, which they had done in the past to re-aerate and recover the solids.

He also explained that the aeration basin had also gone septic and had lower dissolved oxygen residuals from previous CIP's done within the production plant.

I commented to Darrin that we could've maybe helped with the digester contents if they continued to thicken solids over the gravity belt and haul it to us instead of dumping it into the aeration basin. I also explained to Darrin the large amount of ammonia that was stored within the digester was released when the digester became septic and was drained to the aeration basin then later discharged to UCSD.

Memorandum

To: Kraft Pretreatment File
CC: Trent Lyons
From: Wade Lagle
Date: August 8, 2023
Subject: Kraft Pretreatment – Heather Conover phone call

Today at 9:30am I spoke with Heather Conover regarding the issues at the Kraft pretreatment facility. I also explained to her the large amount of ammonia that was stored within the digester was released when the digester became septic and was drained to the aeration basin then later discharged to UCSD nearly tripling our normal influent concentrations.

Heather restated the same issues that Darrin Culter explained yesterday. She also said they were working to try to resolve the low dissolved oxygen levels and exploring other ways to help speed up the recovery process.

Heather ended the call stating she would remain in contact with UCSD as to their progress and what they were doing to resolve the issues.

Memorandum

To: Kraft Pretreatment File
CC: Trent Lyons
From: Wade Lagle
Date: August 9, 2023
Subject: Kraft Plant drive around

On Wednesday 8/9/23 around 7:15am, I drove down McKinley and Columbia Avenues on my way to work. No odor was detected at any point along the route at that time.

Memorandum

To: Kraft Pretreatment File
CC: Trent Lyons
From: Wade Lagle
Date: August 14, 2023
Subject: Kraft Pretreatment – Heather Conover phone call

Today at 11:00am I spoke with Heather Conover regarding the issues at the Kraft pretreatment facility.

Heather stated they had been working with Nalco Chemicals since last week and had contacted Ramboll Engineering firm to address aeration remedies.

Heather ended the call stating she would remain in contact with UCSD as to their progress and what actions were being taken to correct the septic conditions.

Memorandum

To: Kraft Pretreatment File
CC: Trent Lyons
From: Wade Lagle
Date: August 15, 2023
Subject: Kraft Pretreatment onsite visit

Today at 2:30pm Rick and I met with Heather Conover, Darrin Culter and several other Kraft employees, and a representative of Nalco Chemicals.

Prior to arriving at Kraft, Rick and I drove down McKinley and Columbia Avenues and noticed odors in the 1300-1500 blocks of West Columbia Avenue only. We opened the manhole #UC180829, which is the first manhole the Kraft discharge flows into, then lowered a UCSD MSA gas detector to just above the Kraft discharge. The detector showed no residual of hydrogen sulfide in the manhole.

We met with the above-mentioned staff, and they gave us an update on what they have done to help correct the situation and what additional actions were being considered.

Following the meeting, we walked around the pretreatment facility observing the septic conditions in the aeration basin and secondary clarifier. Odors were significant onsite around the aeration basin.

Memorandum

To: Kraft Pretreatment File
CC: Trent Lyons
From: Wade Lagle
Date: August 17, 2023
Subject: Kraft onsite sample collection and effluent sampler

Trent and I arrived at the Kraft pretreatment facility around 2:45pm. We collected the split composite sample for the 8/16/23 sample day.

Afterwards we contacted the plant operator to collect a grab sample of total sulfides from their auto-sampler. While collecting the sulfide sample, it was noticed the effluent sampler had stopped at 20 of 20 samples at 3:00pm. An email was sent to Heather and Darin at 3:50pm notifying them the effluent composite samples must be representative of the entire 24-hour sample day as required by their permit and it was requested the sampler be adjusted.

Memorandum

To: Kraft Pretreatment File
CC: all attendees
From: Trent Lyons
Date: August 17, 2023
Subject: Kraft Pretreatment – Compliance Meeting

In attendance were Heather Conover from Kraft Heinz (Kraft), and Rick Manner, Wade Lagle, and Trent Lyons from Urbana & Champaign Sanitary District (UCSD). The purpose of the meeting was to discuss the events resulting from Kraft's pretreatment malfunction, current actions being taken to return to normal, and lack of reporting.

Heather discussed the current actions that are underway to attempt to correct the issue. Temporary blowers were going to be set up to help with the low D.O. issue. A consultant was going to arrive next week to train Kraft's pretreatment operators and help bring the plant back to normal.

Ramboll Engineering suggested seeding their plant from UCSD's RAS. UCSD offered seed as soon as possible even though temporary blowers were not set up.

Rick Manner asked Heather why the loading to the plant has not been reduced and the plant is still operating at 1 MGD hydraulically. Heather mentioned she has stressed in internal meetings the need to cut down on flow to pretreatment to no avail.

Rick Manner discussed that the District does not have jurisdiction to regular and control the air.

The average daily flow on the permit was discussed. The permit states 765,000 gallons daily, and since the last 10 days of July, they are on track to 30 MGD in a one-month period. It was stressed to Heather that the large change in quantity of the flow necessitated a notification according to the permit.

Heather discussed improvements that were being planned such as an equalization tank and additional secondary clarifier. These were planned roughly around 2024.

Rick Manner told her we can not permit an additional 0.5 million gallons. Heather acknowledged it would require calls to negotiate the increase and looking at the infrastructure to convey it to UCSD.

Heather discussed she has listed 10 million dollars as an estimate to improve the plant to accommodate future loading. Frank with Kraft out of Jacksonville, FL is helping with the project.

The number of product lines at Kraft was also discussed. They currently have 35 lines. It was also brought up their flow was 1.2 MGD on 8/16/23. She mentioned everything goes through pretreatment now except for sanitary. All floor drains were rerouted after the ammonia spill in

2017. The Ketchup line was added in 2021. They have a new Primal Kitchen line added in 2023 that the district was not informed about.

The trend for UCSD's Northeast Plant influent clarifier ammonia analyzer was shown. The elevated levels of ammonia that was pointed out along with the influent flow. Rick stressed the importance of having informed operators to prevent occurrences like this from happening. Operational adjustments had to be made at the Northeast plant to be able to treat the extra loading that Kraft was sending.

Rick informed Heather that another Compliance Meeting will happen regarding this August 3, 2023, incident.

We gave Heather all the handouts UCSD has prepared; ammonia and flow trends, monthly total flow, and annual flow data, UCSD's 2022 inspection of Kraft, Kraft's current permit, and email exchanges up to that point.

Heather said she would investigate the quantity of the septic digester that was drained into the aeration tanks.

UCSD also asked Heather regarding the use of urea as a nitrogen source for the activated sludge process. UCSD asked for an updated schematic of Kraft's pretreatment system. Heather was also told ammonia will be added as a daily parameter to be analyzed.

Memorandum

To: Kraft Pretreatment File
CC: all attendees
From: Trent Lyons
Date: August 18, 2023
Subject: Kraft Pretreatment – Video Call with William George

In attendance were William George from Kraft Heinz (Kraft), and Rick Manner, Wade Lagle, and Trent Lyons from Urbana & Champaign Sanitary District (UCSD). The purpose of the meeting was to discuss the actions being taken to bring their plant to normal and resolve the odor issue in the community.

Mr. George gave an update on the actions currently underway at Kraft. Foggers have been brought in to help reduce the odors until the plant could normalize. He drove around the plant with his maintenance manager to observe the odors for himself.

Temporary aeration was also going to be brought in to help supply D.O. to their septic aeration basin. UCSD offered Return Activated Sludge from the Northeast Plant (NEP) to help seed their aeration basin. UCSD also offered help to take loading off of their system in the form of hauled waste to incorporate at the NEP.

Rick Manner stressed to Mr. George that they need to make more efforts to reduce loading to their system. It was also brought up that their cleaning/sanitizing procedures after lines have been idle for a period of time could cause more unnecessary stress to their already overloaded system.

Rick Manner also spoke about the media coverage of the incident and suggested Kraft should make a statement to address the concerns of the community. Mr. George was going to speak with his media team about the statement.

Appendix E: Email correspondence between UCSD and Kraft Heinz

Note: Email Addresses have been redacted for privacy

Trent Lyons

From: Colter, Darin W [REDACTED]
Sent: Monday, August 7, 2023 11:56 AM
To: [REDACTED]; Trent Lyons
Cc: [REDACTED]
Subject: EXTERNAL: basin
Attachments: Day 215.xlsm; Day 216.xlsm; Day 217.xlsm; Day 218.xlsm

Hello Everyone.

The weekend of ~~JUNE~~ 29-30, the blower that aerates our digester had tripped out. The blower was off long enough to turn the contents in the digester septic. Running the aerator for a week didn't help the septic condition. This had happened several years ago. The solution back then was dump the digester into the basin thinking it would aerate better in the basin. So that's what I did. Today the basin and clarifier are septic and have been since Friday, 8/4. The cod is high and will be until this condition gets better. I have every blower we have running. If anyone has any advice please share it with me. See attachments for more details.

Thanks

This communication is intended for the use of the addressee only and may contain information that is privileged or confidential. If you are not the addressee, you are hereby notified that any dissemination, distribution or use of this communication is prohibited. If you received this communication in error, please destroy it, all copies and any attachments and notify the sender as soon as possible. Any comments, statements or opinions expressed in this communication do not necessarily reflect those of Kraft Heinz Company, its subsidiaries and affiliates.

Ce message est uniquement destiné au destinataire et pourrait contenir des renseignements privilégiés ou confidentiels. Si vous n'êtes pas le destinataire prévu, sachez que toute diffusion, distribution ou utilisation de ce message est interdite. Si vous avez reçu ce message par erreur, nous vous prions d'en aviser l'expéditeur dès que possible et de détruire le message, ainsi que toute copie ou pièce jointe, le cas échéant. Tout commentaire, énoncé ou opinion exprimés dans ce message ne reflètent pas nécessairement ceux de la Kraft Heinz Company, ni de ses filiales ou sociétés affiliées.

Wade Lagle

From: Conover, Heather - [REDACTED]
Sent: Wednesday, August 16, 2023 7:34 PM
To: Wade Lagle
Subject: EXTERNAL: Incident at Kraft Heinz

July 19 and 20 the east side of the plant did passivation on the new lines starting up. The chemical concentration of the passivations put a heavy load on the bio life in the aeration basin causing the oxygen level to drop to zero. On July 29th we noticed the Digester tank had turned septic. The blower to aerate the digester has tripped out and was off long enough causing the septic condition. We decided to slowly drain some of the septic sludge out of the digester into the basin thinking it would aerate better on Aug 4th, 2023. That seemed to be working at first, but by Monday, August 7th the basin also had turn septic causing the odor issue. We notified Trent of the situation not realizing at the time that we had sent additional ammonia from our plant to your plant. We apologize for not following the normal reporting procedures. Our current plan of actions: We are adding a product called sulf-x that was supplied by Nalco to speed up the aeration process. In the meantime, we are looking at getting additional equipment to help with aeration. Tomorrow at 7:30 we will be meeting with Ramboll to talk about temporary aeration and other ways to get our system healthy. Nalco has got us a fogging system to hopefully help immediately with the smell. We will have that up and running tomorrow as well. I will update you on that as soon as it is running and what the game plan that Ramboll has put together for us as well.

Thank you for all of your help! It's be greatly appreciated.

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The Kraft Heinz Company
Champaign, Illinois
CEI Inspection - August 21, 2023

Wade Lagle

From: Wade Lagle
Sent: Thursday, August 17, 2023 3:50 PM
To: Conover, Heather
Cc: Colter, Darin W; Trent Lyons
Subject: Kraft combined discharge sampler

Heather,

Trent and I came out today to collect the previous sample day composite and a to collect a total sulfide grab from your discharge. We noticed the auto-sampler had already stopped for the day at 3pm. Please keep in mind the daily sample must be representative of the 24-hour sampling period.

Please adjust your sample frequency to cover the 24-hour period as stated in your permit.

Please let me know if you have any questions.

Best regards,

Wade Lagle
Director of Operations
Urbana and Champaign Sanitary District

Appendix F: Influent Loading Measured at UCSD on August 4 - 7, 2023

UCSD Influent Ammonia Measured			
Day	hour	Flow MGD	Ammonia (mg/L)
8/4/2023	0	6.8	21.9
		6.4	22.4
		6.1	21.7
		5.6	22.0
	4	3.6	23.0
		3.1	24.4
		3.2	26.1
	7	3.3	26.5
	8	5.1	26.3
	9	6.4	27.2
	10	7.2	29.3
	11	8.2	30.4
	12	8.0	33.9
	13	7.7	36.5
	14	8.1	39.3
	15	8.0	40.9
	16	7.9	43.1
	17	7.1	46.7
	18	6.9	48.9
	19	7.8	50.9
	20	7.5	53.2
	21	7.8	54.5
	22	7.5	55.4
	23	7.3	57.2
8/5/2023	0	7.7	58.7
		6.7	61.3
		5.3	61.2
	3	4.7	59.0
	4	3.3	61.0
	5	3.0	61.3
	6	3.2	59.6
	7	4.0	59.9
	8	3.4	59.7
	9	4.9	59.9
	10	7.1	60.5
	11	8.7	61.4
	12	15.0	62.1
	13	23.7	62.5
	14	19.3	64.0
	15	17.9	60.3
	16	18.7	56.0
	17	18.6	55.7
	18	16.3	54.0
	19	14.1	53.1
	20	11.6	51.1
	21	10.5	50.8
	22	10.2	45.8
	23	9.6	43.7
8/6/2023	0	9.1	44.9
		7.7	45.1
		7.3	43.6
		7.1	41.1
	4	5.3	40.6
	5	4.8	42.0
	6	4.8	40.9
	7	5.3	40.0
	8	6.1	39.4
	9	6.8	38.6
	10	7.0	38.1
	11	8.1	36.8
	12	9.1	36.1
	13	9.2	36.1
	14	10.3	36.7
	15	9.5	36.6
	16	8.1	36.6
	17	8.5	36.3
	18	7.9	36.0
	19	9.5	36.6
	20	9.6	36.0
	21	9.7	36.3
	22	9.7	35.2
	23	12.3	35.0
8/7/2023	0	12.5	33.4
		9.9	33.4
		8.2	33.3
		6.8	32.6
	4	6.0	32.0
		5.0	33.2
	6	4.7	32.6
		6.0	24.0

Appendix G: Monthly Samples Collected at Kraft Effluent in 2023

2023	Kraft Effluent	Kraft Effluent	Kraft Effluent	Kraft Effluent	Kraft Effluent	Kraft Effluent	Kraft Effluent	Kraft Effluent	Kraft Effluent	Kraft Effluent
	1/4/23	2/7/23	3/1/23	4/3/23	5/8/23	6/5/23	7/17/23	8/1/23	8/15/23	8/16/23
pH	7.18	7.30	7.12	7.42	8.9	7.49	7.86	7.19	7.46	7.21
BOD	17	< 25	39	142	11	< 10	6.1	50		
TSS	24	14	72	330	9.3	13.6	10.7	66	257	233
Ammonia	9.0	0.31	0.19	0.39	0.1	0.33	0.32	1.00	0.16	0.12
PO4 as P	0.24	0.32	0.62	1.5	0.3	0.46	0.21	0.8	2.0	
Nitrate	0.77	0.50	2.5	1.62	< 0.23	0.88	1.77	0.31		
COD	69	43	116	296	46	37	53	143	576	500
%TS										
%VS										
TKN										

Appendix H: Graph of Average Monthly Flow discharged by Kraft Heinz in Million Gallons per Month

