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

Purpose: NPDES Compliance Evaluation Inspection

Facility:
Rantoul Foods, LLC
205 East Turner Street
Rantoul Illinois, 61866

NPDES Permits: ILR007774 and ILR10ZB4E

Date of Inspection: July 3, 2023

EPA Inspectors:
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I. INTRODUCTION

The purpose of the report is to describe, evaluate and document Rantoul Food's compliance with the Clean Water Act (CWA) and its National Pollutant Discharge Elimination System (NPDES) permit at its facility.

II. BACKGROUND

On Monday June 26, 2023, IEPA received an anonymous complaint with a video of liquid blowing out of Rantoul Food's wastewater tanks on the previous day (Appendix E). On June 29, 2023, Rantoul Foods filed a hazardous material report with the Illinois Environmental Protection Agency (Appendix C) concerning process wastewater entering its stormwater pond.

Rantoul Foods holds a ILR00000 Stormwater Permit for Industrial Activity. Rantoul Foods filed a notice of intent for coverage under the Illinois EPA permit for Industrial Stormwater and was issued NPDES permit number ILR007774 effective May 18, 2021. Rantoul Foods also holds a ILR10000 Stormwater Permit for Construction Activity. The Effective Date for the Construction Stormwater NPDES Permit is October 29, 2021 under NPDES ID: ILR10ZB4E. Rantoul Foods also holds a Illinois Environmental Protection Agency (IEPA) permit to operate a wastewater pretreatment system.

A description of the construction project listed on the NOI application states: "The replacement and expansion of their wastewater pretreatment system consisting of a new lagoon, aeration basin, secondary clarifiers and control building along with associated site grading and access drive improvements."

III. OPENING CONFERENCE

On July 3, 2023, I, along with Keith Middleton (EPA), and Jeffrey Holste, Daniel Chulgi Kim and Amelia Allen (all from IEPA) drove to the Rantoul Foods Facility and met with Mike Welu and Jared Ernst. I presented my inspector credentials to both Rantoul Foods Representatives. I explained that as part of the inspection EPA will take photographs and asked if anything discussed was Confidential Business Information. Both responded that there was not.

IV. DISCUSSION

IEPA showed the Rantoul Foods Representatives the video of liquid blowing out of Rantoul Food's wastewater tanks from Sunday June 25, 2023, which was sent as part of a complaint to IEPA (Appendix E). Mr. Welu stated that this was known as a "foam over". He explained that the Rantoul Foods pretreatment tanks periodically foam through the 12 inch vent and when this occurs it would hit the building and stay on the concrete. The area around the building is rock and concrete with a secondary containment dike that was designed to capture and contain excess foam with a barrier that blocks it from entering the stormwater pond. He stated that during these events not a lot of wastewater is released since it is in the form of foam. IEPA stated that it appeared in the video, that wastewater was blown a distance which would exceed the secondary containment dike and it appeared to be a liquid rather than just foam.

Rantoul Foods Representatives stated that on Sunday June 25, 2023, there was an issue with the wastewater blowers which caused foam to form, but these were back to running the next day. EPA asked whether the tanks have a high alarm system and if so, did it notify the operators that an overflow had occurred. Mr. Welu stated that at that time on Sunday, there was no operator running the treatment system since production had finished for the day. Mr. Ernst explained that alarm level sensors were installed in 2015, but are not reliable and visual observation is the most accurate method to determine how full the tanks are. When the operator left on Sunday, the tank was "2 rings down" which means approximately 10 feet below the top. With regard to the foam over, Rantoul Foods representatives stated that the blowers had problems working and new Kaiser blowers were installed around 4-5 years ago.

Inspectors requested what had occurred on Thursday June 29, 2023 when Rantoul Foods filed a Hazardous Waste Report (Appendix D). Facility representatives' stated that on Thursday a derecho storm blew off the north portion of the roof of the pretreatment facility. The power was shut off to prevent electrical gear from getting wet. Water did cause some issues with the computer panels that control the pretreatment system and the pretreatment system had not been operational since Thursday. At the time of the inspection, the pretreatment system was shut down, all the tanks were full and a 6-inch trash pump and a 30-foot hose was installed to pump the wastewater to the newly constructed lagoon. A generator was brought in and installed by 8:30pm on Thursday to force air into the Biotank to keep the bugs alive. On Thursday, all production was shut down and cleanup was phased to ensure there was enough tank capacity for the wastewater. At the time of the inspection, the production facility was online and producing wastewater that was being sent directly to the new lagoon and the equalization and dissolved air flotation (DAF) tanks were still full.

EPA requested information on whether Rantoul Foods believed wastewater had been released to the stormwater pond during this event and if the stormwater ponds had been discharging to the Village of Rantoul storm sewer system at that time. Mr. Ernst stated that he installed sandbags and pigs to prevent any discharge from leaving the stormwater ponds and the ponds are around 2 ½ feet below the tops because of little rainfall. He does not think that any wastewater had reached the stormwater ponds from the event occurring on June 29th but wastewater was released from the pretreatment system near the south stormwater pond. Although the ponds were not able to discharge, Rantoul Food still plans to clean the stormwater ponds as a precaution by pumping the current contents from the south pond into the lagoon. From the lagoon it will then be treated as wastewater and pumped through the pretreatment system for treatment before sending it to the Village of Rantoul sewer. The north pond will then be pumped to the south pond, and then also pumped to the lagoon and to the pretreatment system similarly.

I asked how the foam was cleaned up from the release on Sunday, June 25th and whether it was present on the ground during Thursday's rainstorm and could have flowed into the stormwater ponds at that time. Rantoul representatives stated that the foam dries and is broom swept up and it was cleaned up before the rain on Thursday. They also stated that the release of wastewater from Thursday, June 29th had not yet been cleaned off of the property.

I asked for an update on whether construction on the lagoon and the new pretreatment system has been completed. Mr. Ernst stated that the lagoon is built but the gas and floating membrane cover

had not yet been installed but is expected to go on in 15 days. They are also still waiting on control pieces and a programmer. The facility is still working with the gas company to determine whether the lagoon could generate enough energy to sell back to the grid. The lined lagoon has been completed and is acting as a settling lagoon instead of an anaerobic lagoon as it is designed. The lagoon has a 9.5-million-gallon capacity and the facility is currently producing approximately 400,000 gallons of wastewater per day and currently they have at least 7 feet of capacity left.

When the new pretreatment plant is operational, Rantoul Foods stated that they will continue to use their own pretreatment plant employees. There are currently four pretreatment operators and Mr. Ernst is the only Class K operator. Two pieces of equipment, a rotoscreen and sludge press that are located at the currently operating pretreatment plant will be moved to the new pretreatment system. All other equipment will be new. The NPDES Construction permit is still active and Mr. Ernst hopes that it can be terminated and the new plant will be operational in August 2023.

V. SITE VISIT

At 12:08pm, IEPA, EPA Inspectors, and Mr. Ernst began a facility walkthrough. Mr. Welu was not a part in the rest of the inspection. The facility tour consisted of walk-through of the existing wastewater pretreatment system, south stormwater pond, storm sewer inlet (off property), new wastewater pretreatment facility, stormwater drains surrounding loading, processing and rendering buildings and the north stormwater pond. Inspectors did not view the interior of processing areas.

Wastewater Pretreatment Facility and South Stormwater Pond

Inspectors and Mr. Ernst began walking around the Rantoul Foods pretreatment facility. Pit 1 is the collection area for all process wastewater prior to entering the pretreatment system. According to a description of the Illinois Environmental Protection Agency permit to construct and operate water pollution control facilities, from Pit 1 wastewater then discharges through a rotary drum screen for coarse solids removal, then to two equalization tanks with mixing and aeration to prevent settling and odors. Wastewater enters a DAF unit (DAF 1) where suspended solids are floated and scraped away. Wastewater then enters into Pit 2 and then is pumped to the Biotank and then to a sludge floatation unit (DAF 2). The effluent then goes to a grease interceptor. The liquid is discharged to the Village of Rantoul sewer while the solids go again through a sludge tank where it is processed by a filter press and rotary vacuum drum precoat filter. Filtrates goes back to the beginning of the system. The sludge press system replaced an ALAR brand system in 2020.

I observed a hose in pit 1 (Photo 2) connected to a pump (Photo 3) which would transfer untreated wastewater to the uncovered lagoon (Photo 30-31). Mr. Ernst confirmed that all wastewater was sent to the uncovered lagoon for holding and the existing wastewater pretreatment units were not operational although blowers were used to keep the bugs alive in the Biotank. Inspectors confirmed that a pump was in Pit 1 and transferring wastewater to the

lagoon. Inspectors also noted that flow into Pit 2 was visible and DAF 1 was running at the time of the inspection. Mr. Ernst stated that some parts of the pretreatment system may be running.

I asked Mr. Ernst how the tank volume is determined, and he responded that visually checking the tank is the most accurate method. He stated that there is a full tank sensor but it is not accurate. Every shift the wastewater operator must visually check how full the tanks are. Their practice is to keep the tanks below "4 rings" or it could risk an overflow. I asked what the volume of the wastewater that this pretreatment facility will process on average. He stated that usually it would be around 400,000 gallons per day or approximately 175,000 gallons on a processing shift and 250,000-275,000 gallons on a sanitation or cleanup shift. The dumpster that receives sludge from the sludge press is replaced approximately once per shift. I asked how many operators Rantoul Foods has each day. He stated there is a wastewater operator on each shift in addition to a supervisor. If anything goes wrong, the operators will call either Mr. Ernst or Bill McCarty, Maintenance Manager at Rantoul Foods.

I asked Mr. Ernst how the pretreatment operators will know the wastewater is able to be discharged to the Village of Rantoul sewer and he responded that a visual check is used to determine if treatment was sufficient. He stated that if the water is clear, the operators can send it to the city. If the water does not look clear, they must recirculate until it does. Inspectors noted there were 24 bottles on the wall, each with a different time (Photo 10). Mr. Ernst stated that the operators must take a water sample every hour to determine if it is clear. He also stated that the new pretreatment system that is being constructed will have SCADA and GIS mapping capabilities to help with process control.

I noted there were black grains on the ground near the aerated activated sludge tank, known as the Biotank. Mr. Ernst stated that this was the sludge from the June 29th spill which had dried. Inspectors noted this sludge on the ground surrounding the Biotank on the east (Photo 7) and the south (Photo 14-16). I asked Mr. Ernst how often the concrete barrier surrounding the Biotank will be cleaned and he responded that it will only be cleaned out if it foams over and it is not on a regular maintenance schedule. I noted blood storage onsite in square caged totes (Photo 3). Mr. Ernst stated that the blood had been moved to the pretreatment area to aid in growing bugs for the new wastewater treatment system. Otherwise, the blood from processing is chilled and sent to a laboratory for protein research and stored in a different part of the facility.

At the south area of the Biotank there was a location where the grease interceptor is cleaned. Mr Ernst stated that this is cleaned approximately once per year. Also in this area was a portable frac tank. Mr. Ernst stated that this was used when dealing with their wastewater contractor MI2. He stated that he believes Rantoul Foods started working with MI2 in 2019 and continued until spring of 2020. At that time MI2 hired Rantoul Foods same wastewater employees to work at the wastewater pretreatment plant in their previous positions and when Rantoul Foods discontinued working with MI2, Rantoul Foods rehired their own employees back to their original positions.

At the south stormwater pond, I noted that the black dried sludge extended to the riprap but was not present on the area that sloped downwards toward the south pond (Photo 18). Mr. Ernst stated that all the rocks along the south stormwater pond were new and had been purchased in the last two years. I noted that the pond appeared low and was a few inches below the outfall

pipe that leads off property into the Village storm sewer system. I noted a metal plate, held up by sandbags, was physically blocking the pond water from entering the outfall (Photos 19-20). The quarterly stormwater inspection report from 6/22/23 indicated that the ponds were 1-2 feet lower than normal and no rainfall occurred during the second quarter of 2023.

At the time of the inspection, there was some construction occuring along Route 1300 near the south stormwater pond. Mr. Ernst explained that the Village of Rantoul was installing a new parshall flume. We walked to the stormwater inlet manhole just outside of Rantoul Foods south stormwater pond, on the east of Route 1300. At that manhole, I saw two cords coming out of two pipes on the east and northeast sides (Photos 21-22). Mr. Ernst explained that the North and South Stormwater ponds have pipes that come through this manhole. Mr. Ernst stated that on Friday afternoon Rantoul Foods had installed inflatable pigs, or plugs, as a secondary measure to prevent any stormwater discharge from leaving the north or south stormwater ponds. I asked whether the stormwater ponds had discharged before the pigs were installed and Mr. Ernst stated that there was no discharge on Thursday, and it was completely dry on Friday. I did not see any flow at this manhole coming from either pond. I requested information on how the stormwater would proceed from Rantoul Foods to Big Ditch when flow does occur. Mr. Ernst stated that all the stormwater would enter the Village of Rantoul storm sewer system and flow through that system to Big Ditch and that there is no other route such as drain tiles in the field.

Newly constructed Pretreatment Facility

I walked by two new empty18-foot clarifiers (Photos 24 – 25). Mr Ernst stated that stairs to the clarifier still had to be built. Sludge from the clarifiers will be pumped underground to the new pretreatment building. The existing sludge press will be moved to the new pretreatment building. A three-separation-chamber aeration basin was built and contained a small amount of water, pumped from the south stormwater pond, to protect the silicone diffusers from sunlight (Photos 26 – 27). The three basins can be run in series or separately. The aeration basin still needs sensors and a control box to be installed. The sensors can determine depth, but the valves are manually operated. So, operators can tell from the sensors which valves are open and which basins are operational based on depth. Mr. Ernst showed the Inspectors a winch for each basin that Rantoul Foods designed itself (Photo 28) and there is a valve that can isolate the lagoon if necessary.

The lined lagoon was receiving process wastewater from Pit 1 (Photo 30 - 31). The lagoon was coverless and, although it was designed as an anaerobic lagoon, the cover had not yet been shipped or installed. Mr. Ernst stated that the cover was expected to be shipped next month in August.

Inspectors walked to a pretreatment building that was mostly empty. The blowers were installed (Photo 34). There was an empty space for the rotoscreen and sludge press which are currently part of the existing pretreatment system to be moved to this new location (Photo 35). Those two pieces of equipment are the only part of the existing pretreatment system which will be used once the new pretreatment system is operational, according to Mr. Ernst. The building has a large empty space which Mr. Ernst stated will hopefully be able to use for the methane production.

The sludge from the clarifiers is connected via underground pipe to the new sludge tanks (Photo 33).

I asked what was the impetus for the new pretreatment plant, and Mr. Ernst stated that the pretreatment plant has been in the works for 5 years and that this pretreatment plant is designed to treat a larger volume than Rantoul Foods produces at its current rate. It took 2 ½ years to build it and construction began in October 2020. I requested the hydraulic residence time for treatment design for the new system. Mr. Ernst replied that it designed to treat 350,000 gallons for 21 days in the lagoon plus 2 days in the aeration tanks plus 1 day in the clarifiers. The lagoon maintenance will be to periodically remove sludge from the lagoon via tanker trucks and send to the sludge digester. I asked how the treatment time compares with the current existing system. Mr. Ernst replied that the current treatment time is less than a day. Currently, the wastewater treatment plant runs three shifts, but production is only two shifts, so the wastewater operators must work an extra shift to process the wastewater coming out of production.

Facility Walkaround and North Stormwater Pond

We then walked around the processing facility along the east then north towards the north stormwater pond. I noted that the stormwater inlet nearest the live animal unloading docks (Photo 36) appeared to be blocked and had foam and debris sitting on stagnant water (Photo 37). A stormwater drainage ditch ran along the north of the processing facility. EPA noted some trash and dried vegetative debris in the ditch area (Photos 38-40).

I noted that the hair and blood storage area on the north side of the processing facility appeared different than it was during the previous 2020 EPA Inspection (Photo 41). The loading area is paved and the storm drain is separated by a small berm at the edge of the pavement (Photo 43). Mr. Ernst stated that hair is mainly discarded through a hydrolysis process, which occurs indoors. On occasion hog hair could be removed from the facility via truck and the stormwater drain at this location is blocked to prevent any process wastewater, which would drip off the truck, from entering the stormwater system. I noted mats of hog hair on the ground outside of the paved area and some trash and hog hair at the blocked stormwater drain (Photos 42, 44).

I noted a dried blood spill outside on a loading area near the hair and blood storage area (Photo 45). Mr. Ernst stated that is probably a downer that slipped off the skid steer on the way to the rendering area. Generally, inedibles are piped to rendering; however, an animal that arrives dead or is condemned will be transferred whole to rendering by skidsteer and on the way it can slip off onto the pavement. Mr. Ernst stated that the blood stains are cleaned up at the end of the processing shift. When I requested whether spill kits were accessible, Mr. Ernst stated that nine spill response kits have been strategically placed around the facility in areas most likely to need them.

At the north pond, I noted that the water had an odor and had a turbid blue color (Photos 46-51). There was a floating mass of vegetation on the southeast corner of the pond and small dead fish floated on the surface. Mr. Ernst stated that the pond had an algae problem since springtime of this year, and he had blocked off the outfall with a metal plate and sandbags so the pond could not discharge (Photos 47 - 48). The quarterly inspection reports from first quarter visual

examination of stormwater quality indicate that on 3/23/23 the pond had green coloring with floating algae and the plate with sandbags was placed at that time. Second quarter inspections dated 6/22/23 noted similar issues.

The facility site walkthrough ended at 2:37 pm. EPA and IEPA Inspectors then left the facility and followed the flowpath of stormwater through the Village of Rantoul storm sewer system to Big Ditch.

VI. CLOSING CONFERENCE

EPA noted the following areas of concern:

1. Stormwater inlet next to barn and animal loading area was blocked and had foam and debris floating on the surface. ILR00 section F.2.e states in part: Stormwater Water Management Practices shall be implemented to remove pollutants from stormwater discharge and section F.2.a.viii states Permittee must ensure that all wastewater drains to a sanitary sewer not the stormwater water drainage system and section F.3.c states that except for authorized discharges, the Permittee shall effectively prohibit non-stormwater discharges into the storm sewer system.

2. North stormwater pond is contaminated with algae and dead fish. Permit IL00 section F.1 states that if the Permittee finds that its control measures are not achieving their intended effect of minimizing pollutant discharges it must modify these control measures in accordance with the corrective action requirements. And the corrective actions listed in H1.d state when visual observations indicate signs of storm water pollution, the Permittee must review its SWPPP.

3. Process wastewater blew out of the Biotank on Sunday June 25, 2023 and onto the ground creating a spill of untreated wastewater which then had to be cleaned up. Permit ILR00 Attachment H.5 under proper operation and maintenance states: The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control which are installed or used by the permittee to achieve compliance with condition of this permit.

4. South stormwater pond may have received process wastewater from a spill on Thursday Jun 29, 2023. IL00 section F.2.d.vi states: Document all significant spills and leaks or oil or toxic or hazardous pollutants that occurred in exposed areas, or that drained to a stormwater conveyance during the previous 5 years and section F.b under Preventative Maintenance states: The permittee must have procedures and frequencies for inspection and maintenance of stormwater conveyance system devices and testing of plant equipment and systems that could fail and result in discharges of pollutants to stormwater.

5. Dried sludge from process wastewater was observed on the ground near the pretreatment facility and south stormwater pond. The secondary containment surrounding the Biotank had not been pumped down or cleaned out. Trash and process wastes such as blood spills

and hog hair were observed on the ground near the processing building. Trash and dried vegetation were observed in the stormwater channels leading to the north pond. Permit IL00 section F.2.iii states to clean up spills and leaks promptly and section F.2.c under Good Housekeeping and Pollution Prevention Practices requires the maintenance of clean, orderly facility areas that discharge stormwater. Section H.2.a lists cleaning up any contaminated surfaces so the material will not discharge in subsequent storm events.

6. Blood is stored in areas outdoors where leaks could enter the south stormwater pond. Permit IL00 F.2.a.ii requires, in part, to minimize exposure of material storage areas by either locating these inside or protecting them with storm resistant coverings. The Permittee must include storage within berms or other secondary containment devices to prevent leaks and spills from entering stormwater water runoff and section F.2.d.ii. states to implement procedures for material storage such as the use of secondary containment devices to prevent discharge of pollutants.

Documents received during the inspection:

- Construction weekly reports from January 2023 through June 2023
- Annual comprehensive site compliance reports dated January 2022 and 2023
- Quarterly visual examination of stormwater quality since June 2021 through June 2023

Appendix A: Inspection Photo Log

All photos taken by: Keith Middleton, Environmental Engineer
Cameras: RICOH WG-4 GPS (Photos 1-35) and Canon PowerShot SX230 (Photos 36-65)

1. RIMG001
Description: Storage sheds next to the wastewater pretreatment facility. The blue hose used to transfer untreated process wastewater from Pit 1 to the lagoon. Inspectors noted the left loading dock is sloped with a stormwater inlet on the bottom (visible in Photo 13).
Location: Storage sheds near wastewater pretreatment facility
Date/Time: July 3, 2023 12:13 PM

2. RIMG002
Description: Pit 1 location with a hose and pump bypassing the existing pretreatment system and transferring process wastewater to the uncovered lagoon. This hose is connected to the pump in Photo 3 which pumps through the blue hose shown in Photos 1, 13, and 30-32.
Location: Wastewater Pretreatment System Pit 1
Date/Time: July 3, 2023 12:14 PM

3. RIMG003
Description: A temporary pump is attached to a hose that is located in Pit 1 (Photo 2). The blue hose is attached to the back of this pump. In the center right are totes of blood used for growing bugs, according to Mr. Ernst.
Location: Wastewater pretreatment facility
Date/Time: July 3, 2023 12:16 PM

4. RIMG004
Description: Two above ground equalization tanks. Each tank holds 150,000 gallons. At the time of the inspection, Mr. Ernst stated that these tanks were full but not in use, and all process wastewater was bypassing the pretreatment system to be stored in the uncovered lagoon.
Location: Wastewater pretreatment system
Date/Time: July 3, 2023 12:17 PM

5. RIMG005
Description: Photo shows the east of one equalization tank (same one from Photo 4) on the far right and "Biotank" or aerated activated sludge tank (center). The opening to Pit 2 is on the ground in front of the Biotank. Note the cement barrier surrounding Biotank contained liquid at the time of the inspection and dried sludge, which appears as black grains, on the top of Pit 2.
Location: Wastewater pretreatment facility
Date/Time: July 3, 2023 12:17 PM

6. RIMG006
Description: View into Pit 2. Although the pretreatment facility was not expected to be operating at the time of inspection, inspectors noted some flow into Pit 2. Note dried sludge on the surface of Pit 2.
Location: Wastewater pretreatment facility
Date/Time: July 3, 2023 12:23 PM

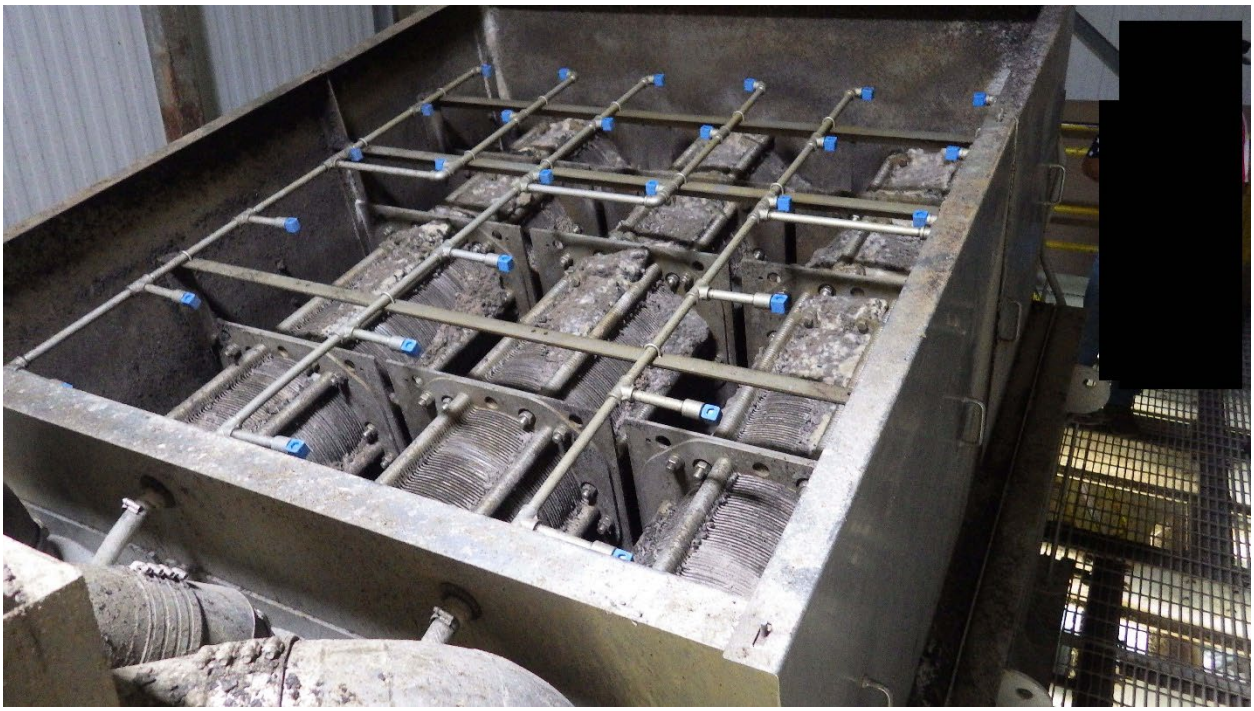
7. RIMG007
Description: Opening into Pit 2 on the right. Biotank in center and blood storage on top left. South stormwater pond in rear (not visible behind the blue and white truck). Note dried sludge on the ground which appears as black grains. Note liquid in the cement barrier surrounding the Biotank.
Location: Wastewater pretreatment facility
Date/Time: July 3, 2023 12:23 PM

8. RIMG008
Description: DAF 2 tank located inside the wastewater treatment building. The DAF 2 tank was not operating at the time of the inspection.
Location: Wastewater pretreatment facility
Date/Time: July 3, 2023 12:29 PM

9. RIMG009
Description: Drain in the wastewater facility where wastewater is recirculated to the pit.
Location: Wastewater Pretreatment facility
Date/Time: July 3, 2023 12:34 PM

10. RIMG0010
Description: Sample bottles on wall in wastewater facility where internal process control samples are collected of DAF 2 water every hour. The effluent samples that are submitted for the pretreatment permit are not collected at this point. There is writing that states “Every shift every hour we need to take water samples If water is bad don’t take sample but it needs to be documented in log book so we can see why there is no sample for that hour”.
Location: Wastewater pretreatment facility
Date/Time: July 3, 2023 12:35 PM

11. RIMG0011
Description: Sludge press which replaced the ALAR system in 2020.
Location: Wastewater pretreatment facility
Date/Time: July 3, 2023 12:37 PM



Personally identifiable information has been redacted from this photo on top right.
12. RIMG0012
Description: Interior of Sludge Press system from Photo 11.
Location: Wastewater pretreatment facility
Date/Time: July 3, 3023 12:39 PM

13. RIMG0013
Description: Quonset hut used for storage located next to the wastewater pretreatment facility (same in Photo 1). The blue hose used to transfer untreated process wastewater from Pit 1 to the lagoon is nearby. Inspectors noted the left loading dock is sloped with a stormwater inlet on the bottom.
Location: Wastewater pretreatment facility
Date/Time: July 3, 2023 12:43 PM

14. RIMG0014
Description: View of the south of the Biotank. Note black grains on surface of cement that is dried sludge. South stormwater pond is just out of view on the left.
Location: Between wastewater pretreatment facility and south stormwater pond
Date/Time: July 3, 2023 12:44 PM

15. RIMG0015
Description:
Location: Between wastewater pretreatment facility and south stormwater pond
Date/Time: July 3, 2023 12:45 PM

16. RIMG0016
Description: South stormwater pond, looking south. Note black dried sludge on concrete near the stormwater pond.
Location: Between wastewater pretreatment facility and south stormwater pond
Date/Time: July 3, 2023 12:47 PM

17. RIMG0017
Description: South stormwater pond, looking southeast. Note black dried sludge on the riprap near the stormwater pond. A hose with process wastewater from Pit 1 to the lagoon is located in the center leading towards the left of the photo.
Location: Between wastewater pretreatment facility and south stormwater pond
Date/Time: July 3, 2023 12:51 PM

18. RIMG0018
Description: South stormwater pond, looking east. Note black dried sludge on the riprap just beyond the concrete, but not on the riprap as it sloped towards the pond. A hose with process wastewater from Pit 1 to the lagoon is located in the center of the photo.
Location: Between wastewater pretreatment facility and south stormwater pond
Date/Time: July 3, 2023 12:56 PM

19. RIMG0019
Description: Outfall at south stormwater pond that would discharge pond water to the village of Rantoul storm sewer system. Sandbags and metal plate were blocking the pond water from entering the outfall pipe. At the time of the inspection the pond water was below the outfall pipe. Note plastic trash present in pond.
Location: South stormwater pond
Date/Time: July 3, 2023 12:59 PM

20. RIMG0020
Description: Top view of outfall pipe at south stormwater pond that would discharge pond water to the village of Rantoul storm sewer system. Same as Photo 19. Sandbags and metal plate were blocking the pond water from entering the outfall pipe. At the time of the inspection the pond water was below the outfall pipe. Note plastic trash present in pond.
Location: South stormwater pond
Date/Time: July 3, 2023 12:59 PM

21. RIMG0021
Description: Village of Rantoul storm sewer inlet manhole that is closest to the Rantoul Foods south stormwater pond and on the east side of Route 1300. Two ropes are present at the top of the inlet. According to Mr. Ernst each rope is attached to an inflatable pig that prevents discharge of stormwater from entering the Village of Rantoul stormsewer system by plugging the underground pipe.
Location: Village of Rantoul stormwater inlet east of Route 1300
Date/Time: July 3, 2023 1:03 PM

22. RIMG0022
Description: Village of Rantoul storm sewer inlet manhole from Photo 21 that is closest to the Rantoul Foods south stormwater pond and on the east side of Route 1300. The road is at the top of the photo. Two aboveground pipes connect the stormsystem to the west side of Route 1300. Note the two ropes present at the top of the inlet.
Location: Village of Rantoul stormwater inlet east of Route 1300
Date/Time: July 3, 2023 1:05 PM

23. RIMG0023
Description: Overview of the south stormwater pond facing north. Biotank, wastewater pretreatment building and Quonset hut are visible to the north of the pond. A white sample shed is located to the left of the Biotank and Route 1300 is beyond the fenceline out of view on the left. The processing building is also visible to the right.
Location: South stormwater pond
Date/Time: July 3, 2023 1:08 PM

24. RIMG0024
Description: New clarifiers which have not yet been in use. The stairs to view the clarifier have not yet been installed.
Location: New pretreatment system
Date/Time: July 3, 2023 1:09 PM

25. RIMG0025
Description: View inside one of the clarifiers from Photo 24.
Location: New pretreatment system
Date/Time: July 3, 2023 1:12 PM

26. RIMG0026
Description: One of three aeration basins that are part of the new pretreatment system. The basin is not operational yet. A small volume of south stormwater pond water has been pumped into each aeration basin so the diffusers are not damaged by sunlight.
Location: New pretreatment system
Date/Time: July 3, 2023 1:16 PM

27. RIMG0027
Description: Two of three aeration basins that are part of the new pretreatment system, same as Photo 26. The location of the winch system in Photo 28 is at the far end of the basin.
Location: New pretreatment system
Date/Time: July 3, 2023 1:17 PM

28. RIMG0028
Description: Valve and winch system that is designed by Rantoul Foods in place at each of the three aeration basins. Each basin can run in series or parallel and sensors will be used for system control; however, each valve is manually operated.
Location: New pretreatment system
Date/Time: July 3, 2023 1:18 PM

29. RIMG0029
Description: Overview of the uncovered anaerobic lagoon in Photos 30-31.
Location: New pretreatment system
Date/Time: July 3, 2023 1:19 PM

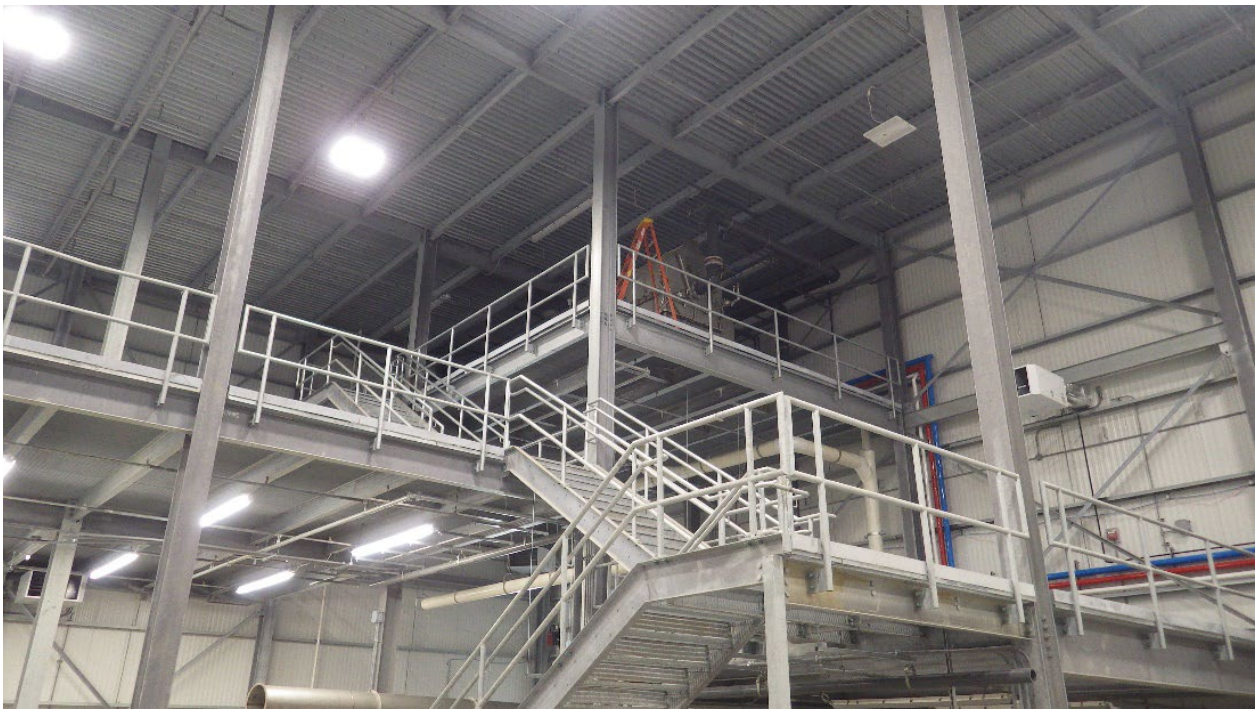
30. RIMG0030
Description: Blue hose that is pumping wastewater from Pit 1 into the lagoon. The lagoon is designed as an anaerobic lagoon however the cover has not yet been installed.
Location: New pretreatment system
Date/Time: July 3, 2023 1:31 PM

31. RIMG0031
Description: Same as photo 30. Wastewater was pumped into the lagoon during the time of the inspection.
Location: New pretreatment system
Date/Time: July 3, 2023 1:33 PM

32. RIMG0032
Description: Photo taken from the top of the lagoon, showing the blue hose running back to the wastewater pretreatment system on the top left. Note the vegetation on the lagoon was not sufficient enough to close out the NPDES construction permit and Mr. Ernst stated that he was planning on reseeding the area.
Location: New pretreatment system
Date/Time: July 3, 2023 1:34 PM

33. RIMG0033
Description: Sludge tanks in the new pretreatment building. Sludge piping connects to the clarifiers and will be pumped to these tanks once the new pretreatment system is operational.
Location: New pretreatment system
Date/Time: July 3, 2023 1:36 PM

34. RIMG0034
Description: Blowers were installed at the new pretreatment building.
Location: New pretreatment system
Date/Time: July 3, 2023 1:36 PM



35. RIMG0035
Description: The location for the rotoscreen and sludge presses which will be moved from the existing pretreatment building to the new facility once the new pretreatment system becomes operational.
Location: New pretreatment system
Date/Time: July 3, 2023 1:36 PM

36. IMG_0747
Description: Live animal unloading area and barns for live storage.
Location: Processing Facility
Date/Time: July 3, 2023 1:52 PM

37. IMG_0748
Description: Clogged sewer inlet nearest the live animal unloading area in Photo 36. The stormwater drain is connected to the north stormwater pond.
Location: Processing Facility
Date/Time: July 3, 2023 1:53 PM

38. IMG_0749
Description: Open stormwater channel on the north of the processing building upstream of the north stormwater pond. Stormwater was present in the channel at the time of the inspection. Note blue trash in center channel.
Location: Processing Facility
Date/Time: July 3, 2023 1:56 PM

39. IMG_0750
Description: Inlet in open stormwater channel seen in Photo 38. A silt fence or other type protective wrap is under the riprap. Note dried vegetation on the inlet grate.
Location: Processing Facility
Date/Time: July 3, 2023 1:57 PM

40. IMG_0751
Description: Open channel upstream of the inlet from Photo 39. Inspectors noted some floatables near the middle of the channel.
Location: Processing Facility
Date/Time: July 3, 2023 1:57 PM

41. IMG_0752
Description: Loading area where hog hair is transferred to truck, when the hair is not hydrolyzed indoors. The truck would park under the snorkel pipe. The concrete truck parking area has been built since the 2020 EPA inspection. According to Mr. Ernst, the nearest stormwater inlet (near ladder) is blocked in this area.
Location: Processing Facility
Date/Time: July 3, 2023 1:58 PM

42. IMG_0753
Description: Inspectors noted dried mats of hog hair on gravel near the concrete hair loading area.
Location: Processing Facility
Date/Time: July 3, 2023 1:59 PM

43. IMG_0754
Description: Stormsewer inlet in hog hair production area from Photo 41. Mr. Ernst stated that this stormwater drain is blocked to prevent production wastewater entering the stormwater inlet. Note small concrete berm surrounding the inlet.
Location: Processing Facility
Date/Time: July 3, 2023 1:59 PM

44. IMG_0755
Description: Closeup of the stormwater drain from Photo 43. Note cigarette butts, dried hog hair and other trash nearby.
Location: Processing Facility
Date/Time: July 3, 2023 2:00 PM

45. IMG_0756
Description: Blood and other production waste from a spill located outside of processing building and potentially exposed to stormwater.
Location: Processing Facility
Date/Time: July 3, 2023 2:01 PM

46. IMG_0757
Description: North stormwater pond. Inspectors noted the pond water had an odor and appeared unnaturally turbid blue, as if blue-green algae was present.
Location: Processing Facility
Date/Time: July 3, 2023 2:06 PM

47. IMG_0758
Description: north stormwater outlet. Blocked by plate, held up by sandbags.
Location: North stormwater pond
Date/Time: July 3, 2023 2:10 PM

48. IMG_0759
Description: Blocked stormwater drain (same as photo 47) blocked by plate and held up by sandbags. Note color or water of bluegreen algae.
Location: North stormwater pond
Date/Time: July 3, 2023 2:10 PM

49. IMG_0760
Description: Dead fish in north stormwater pond. Inspectors noted the pond water had an odor and appeared unnaturally turbid blue, as if blue-green algae was present.
Location: North stormwater pond
Date/Time: July 3, 2023 2:12 PM

50. IMG_0761
Description: Zoomed in photo of dead fish from Photo 49. View downward into the edge of the north stormwater pond. Rip rap from the edge of the pond is visible. Floating dead fish are visible. Inspectors noted the pond water had an odor and appeared unnaturally turbid blue, as if blue-green algae was present.
Location: North stormwater pond
Date/Time: 7/3/2023 2:12 PM

51. IMG_0762
Description: North storm water pond with dugout material from old “boneyard” location. Inspectors noted the pond water had an odor and appeared unnaturally turbid blue, as if blue-green algae was present.
Location: North stormwater pond
Date/Time: 7/3/23 2:13 PM

52. IMG_0763
Description: Headwall for pipe located on the east bank of Big Ditch on the North of US 136. Inspectors did not see any discharge at the time of the inspection.
Location: Big Ditch, north of US 136
Date/Time: 7/3/2023 2:47 PM

53. IMG_0764
Description: Same location as Photo 52 but with a downwards view into the receiving waters of Big Ditch. Pipe is hidden from view by the cement.
Location: Big Ditch, north of US 136
Date/Time: 7/3/2023 2:47 PM

54. IMG_0765
Description: View of Big Ditch to the north, downstream of outlet from Photos 52-53. Photo taken on the north side of US 136 and from the east of Big Ditch.
Location: Big Ditch, north of US 136
Date/Time: 7/3/23 2:48 PM

55. IMG_0766
Description: West side of Big Ditch on showing headwall from south sewer.
Location:
Date/Time:

56. IMG_0767
Description: West side of big ditch showing headwall from south sewer (Same as photo 55).
Location:
Date/Time:

57. IMG_0768
Description: Upsteam on Big Ditch. South of South sewer outfall.
Location:
Date/Time:

58. IMG_0769
Description: Same as Photo 59 - 60. Storm sewer outfall discharging into Big Ditch. This is the storm sewer outfall that Rantoul Foods stormwater ponds discharge into. US EPA Inspectors noted a discharge at the time of the inspection.
Location: Stormwater outfall located south of US 136 and east of Big Ditch.
Date/Time: 7/3/2023 2:51 PM

59. IMG_0770
Description: Same as Photos 58 and 60. Stormsewer outfall discharging into Big Ditch. This is the stormsewer outfall that Rantoul Foods stormwater ponds discharge into. US EPA Inspectors noted a discharge at the time of the inspection.
Location: Stormwater outfall located south of US 136 and east of Big Ditch.
Date/Time: 7/3/2023 2:51 PM

60. IMG_0771
Description: Same as Photo 58-59. Stormsewer outfall discharging into Big Ditch. This is the stormsewer outfall that Rantoul Foods stormwater ponds discharge into. US EPA Inspectors noted a discharge at the time of the inspection.
Location: Stormwater outfall located south of US 136 and east of Big Ditch.
Date/Time: 7/3/2023 2:51 PM

61. IMG_0773
Description: Stormwater inlet that is located near but upstream of the stormsewer outfall to Big Ditch from Photo 60. Location: South of US 136
Date/Time: 7/3/2023 2:54 PM

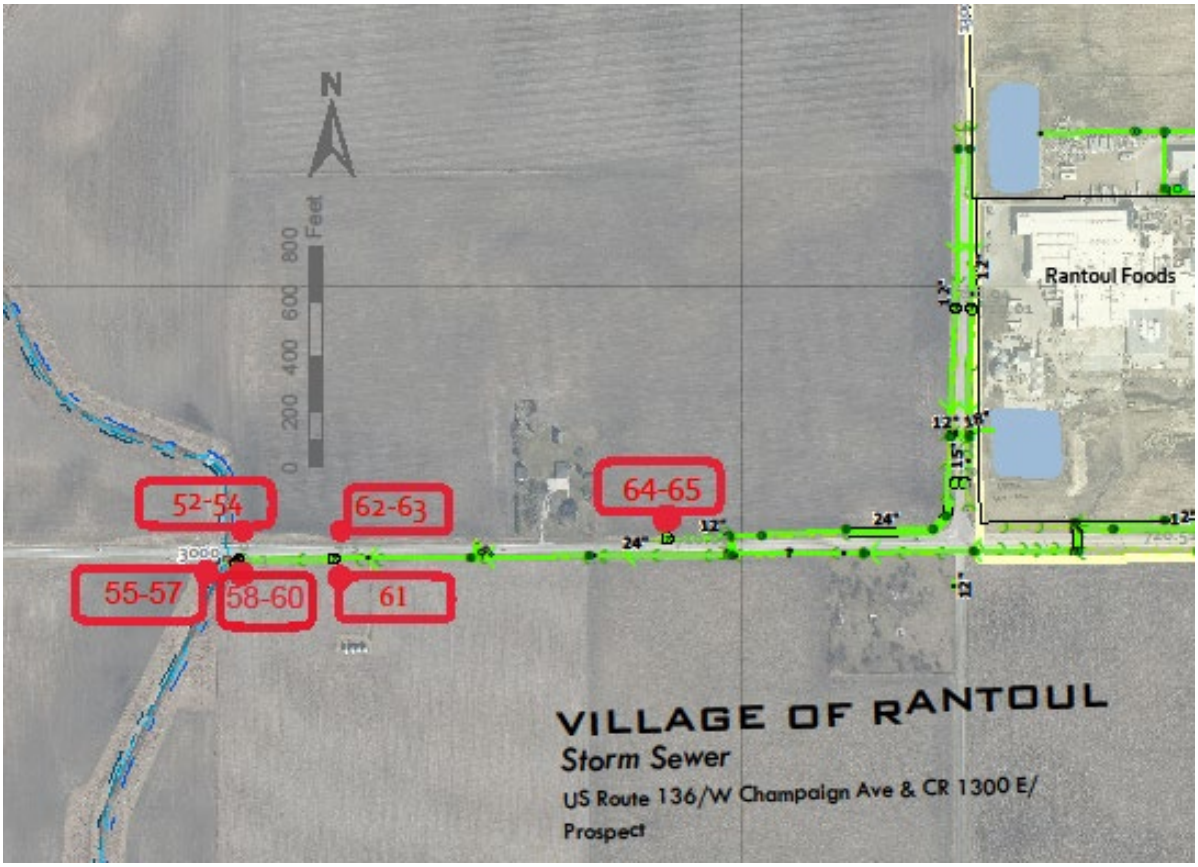
62. IMG_0774
Description: Same as Photo 63. View facing eastward along the north of US 136 showing an aboveground open channel between stormwater excess flow outlet and Big Ditch.
Location: North of US 136
Date/Time: 7/3/2023 2:56 PM

63. IMG_0775
Description: Same as Photo 62. View facing eastward along the north of US 136 showing an aboveground open channel between stormwater excess flow outlet and Big Ditch.
Location: North of US 136
Date/Time: 7/3/2023 2:58PM

64. IMG_0776
Description: Same location as Photo 65 Roadside stormwater drainage overflow point. Excess flow in the roadside stormwater drainage system would be able to flow onto the grassy ditch through this inlet. Pipe is approximately 12 - 18 inches below the inlet grate.
Location: North side of US Route 136
Date/Time:7/3/2023 3:02PM

65. IMG_0777
Description: Same location as Photo 64. Roadside stormwater drainage overflow point. Excess flow in the roadside stormwater drainage system would be able to flow onto the grassy ditch through this inlet. Pipe is approximately 12 - 18 inches below the inlet grate.
Location: North side of US Route 136
Date/Time: 7/3/2023 3:03PM

Approximate locations where Photos 52 – 65 were taken on a Village of Rantoul storm sewer map. This image does not represent conditions observed and is only to be used as reference for location.

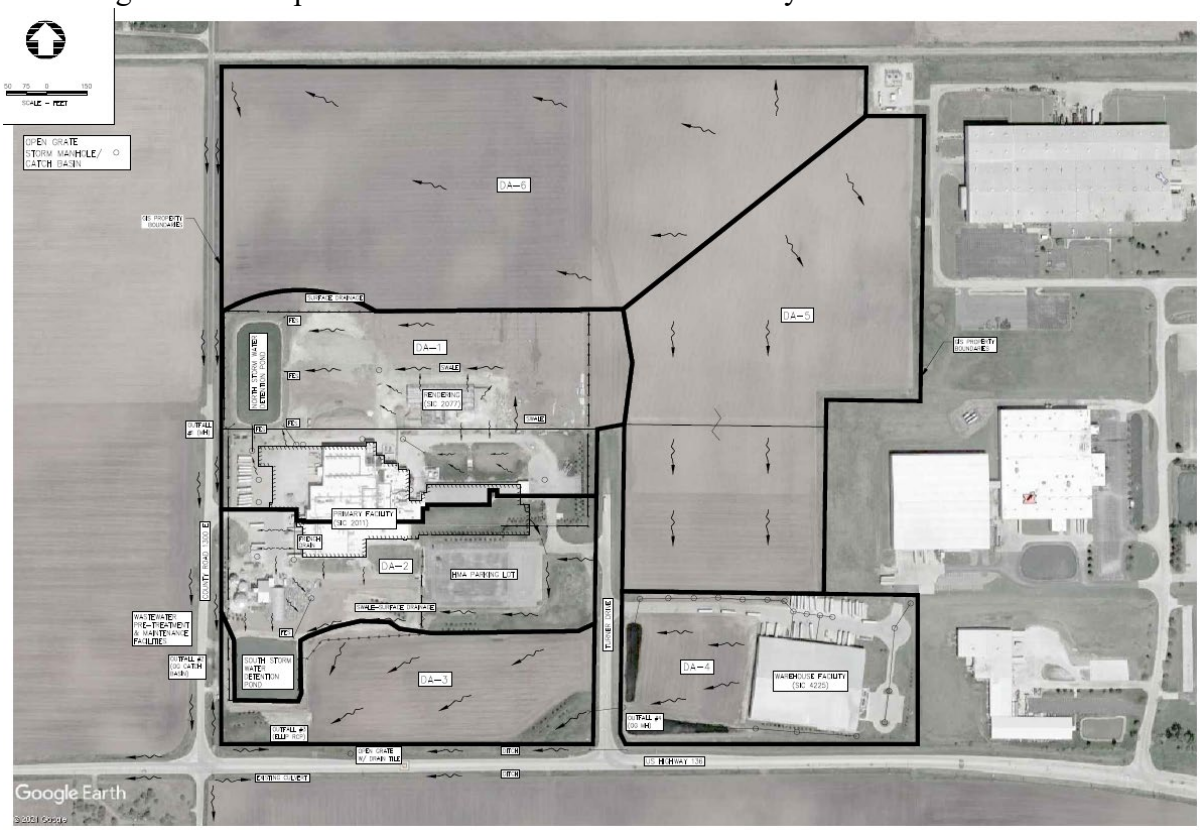


Appendix B: Aerial Images of Rantoul Foods Facility and Stormwater Ponds

Note: Aerial images from Google Earth obtained August 8, 2023. This image does not represent conditions observed and is only to be used as reference.

Appendix C: Site Layout and Drainage Map of Rantoul Foods for NPDES Permit ILR00 Stormwater Pollution Prevention Plan.

This image does not represent conditions observed and is only to be used as reference.



Appendix D – Hazardous Materials Incident Report from June 29, 2023

Hazardous Materials Incident Report

Incident #: H-2023-0511
Entered By: Kattner, Paul (IEMA) on 2023-06-29 16:04:02
Data Input Status: Closed
Leaking Underground Storage Tank (LUST): No
Used PFAS Chemicals (Firefighting Foam) for Fire Suppression: No

Caller:	Jared Ernst
Call Back #:	217/649-6823
Caller Represents:	Rantoul Foods LLC
Hazmat Incident Type:	Leak or spill

INCIDENT LOCATION

Incident Location:	205 Turner Dr		
County:	Champaign	City:	Rantoul
Primary IEMA Region:	7	Secondary IEMA Region:	Not Applicable
Full Address:	205 Turner Dr, Rantoul, IL		
Latitude:	40.31355	Longitude:	-88.2077
Milepost:	N/A	Sec:	N/A
Twp.:	N/A	Range:	N/A
Area Involved:	Fixed Facility		
Media or medium into which the release occurred:	Water		

WEATHER INFORMATION

Temp (deg F):	65 Degrees	Wind Dir/Speed m.p.h:	NW 15-20 MPH

MATERIALS INVOLVED

Material Name:	Untreated tankage from a Hog Butchering facility	Material Type:	Liquid
CHRIS Code:	Unknown	CAS #:	Unknown
UN/NA #:	Unknown		
Is this a 302(a) Extremely Hazardous Substance?	No		
Is this a RCRA Hazardous Waste?	No		
Is this a RCRA regulated facility?	No		
Container Type:	Pipeline	Container Size:	10 Inch
Amount Released:	Unknown	Rate of Release/min:	Unknown
Duration of Release:	Since 15:00.		
Cause of Release:	Severe weather damage caused the on site waste water treatment to go off line. They shut off flow to the waste water treatment plant but can't do anything about the product already in the line. Some product may be released to an on site stormwater retention pond.		

Estimated Spill Extent:	Unknown	Spill Extent Units:	

Date/Time Occured:	2023-06-29 15:00
Date/Time Discovered:	2023-06-29 15:00

Number Injured:	0	Where Taken:	N/A
Number Killed:	0	# Evacuated:	0
On Scene Contact:	Jared Ernst	On Scene Phone #:	217/649-6823
Proper safety precautions to take as a result of the release, including evacuation: None			
Assistance needed from State Agencies: None			
Containment/Cleanup actions and plans: Discharge is being barricaded off and barriers are being used to retain released product as much as possible.			

Responsible Party:	Rantoul Foods LLC
Contact Person:	Mike Welu
Callback Phone Number:	217/892-4178 Ext. #221
Facility Manager:	Mike Welu
Facility Manager Phone #:	217/892-4178 Ext. #221
Street Address:	205 Turner Dr
City:	Rantoul State: IL Zip Code: 61866

Emergency Units Contacted	Contacted	On Scene	Agencies Contacted
ESDA			None
Fire			None
Police			None
Sheriff			None
Other			None

AGENCIES OR PERSONS NOTIFIED			
Agency	**Date/Time**	**Name of Person**	**Notification Action**
IEPA, IDPH, IDOA, NRTP, & IEMA Region #7	2023-06-29 16:05	E-mailed	Report Sent
Champaign County LEPC	2023-06-29 16:05	E-mailed	Report Sent

Narrative:

Follow-Up Information:

Attachments:

Appendix E – Stills from video submitted to Illinois Environmental Protection Agency of untreated process wastewater blowing out of Rantoul Food's Biotank on Sunday June 25, 2023.