



Industrial User Facility Inspection Report U.S. EPA, Region 8

Name of industry and location:

Protein for Pets OpCo LLC
259 30th Street
Greeley, CO 80631

Control Authority / NPDES Permit No.

City of Greeley
NPDES Permit No. CO-0040258

IU – NPDES ID

COPU00172

Date of visit:

January 30, 2024

Approximate Time of visit:

1315 – 1410

Name(s) / Affiliation / email of inspector(s):U.S. EPA:

Al Garcia, garcia.al@epa.gov

City of Greeley:

- Joseph Martinez, joseph.martinez@greeleygov.com
- Kayla Reed, kayla.reed@greeleygov.com
- Joe Kunovic, joseph.kunovic@greeleygov.com

General Facility Information:Representatives at Inspection:

- Lewis Smith – Safety Director
- Richard Maynard – Maintenance Manager

Type of Business Operations:

- Protein for Pets OpCo LLC is a processing facility of meat by-products from beef, bison, lamb, wild boar, pheasant, fish, venison to manufacture protein for the pet food industry.

Facility Information:

- 230 employees
- Seven days/week, 24 hours/day.
- Three 8-hour shifts

Inspection Description:

Al Garcia from the U.S. Environmental Protection Agency (EPA) and Joe Kunovic, Joseph Martinez, and Kayla Reed from the City of Greeley (City) conducted a significant industrial user (SIU) inspection of the Protein for Pets facility (facility) located on 259 30th Street, Greeley, CO 80631. The SIU inspection was conducted as part of the EPA Pretreatment Audit of the City's Publicly Owned Treatment Works (POTW) and EPA-approved Pretreatment Program. The inspection of the facility provides current conditions of the facility's unit operations and consisted of an evaluation of the wastestreams generated from the unit operations, management of these wastestreams, including potential for spills and slug discharges. The facility discharges to the sewer collection

system leading to the City's POTW.

Upon arriving at the facility on January 30, 2024 at approximately 1:15 p.m., Al Garcia of the EPA presented credentials to the facility representatives and explained the purpose of the inspection. During the opening interview, the facility representatives provided an overview of the operations and processes at the facility, wastestreams generated and management/discharge of these wastestreams. The opening interview was followed by a facility tour to visually inspect the unit operations. The EPA conducted a closing conference to discuss potential findings and recommendations identified during the inspection.

Process Description:

The facility located at 259 30th Street, Greeley, CO 80631 is a protein manufacturer for the pet foods industry. The Google Maps view of the facility is shown in Figure 1.

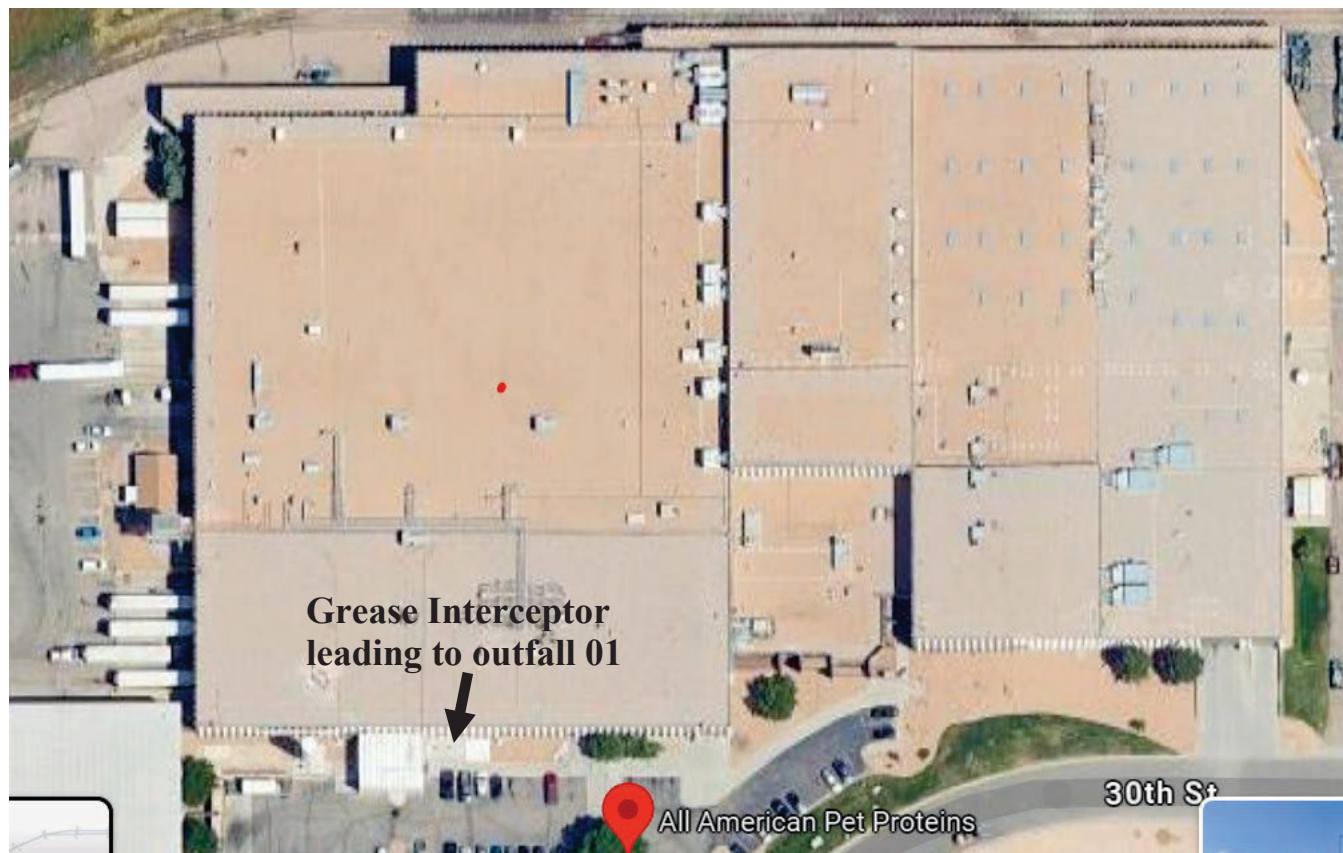


Figure 1 – Protein for Pets OpCo LLC -Google Maps View

Raw Materials Storage –

The facility receives various fresh or frozen meat, byproducts, bones, and organs from trailers in the shipping/receiving dock. The facility stages the meat and other raw materials on pallets in a staging/storage area located on the west side of the processing area. The fresh product in the staging area is processed the week it is received or sent to the freezer for longer-term storage. The frozen meat products/byproducts received are transported to a large freezer or are processed along with the fresh raw material the week it is received.

Protein Manufacturing –

The facility processes the various meat and meat byproducts based on recipes designed for the appropriate fat, moisture, and protein content. The facility procures the raw material to meet the recipe quality. The facility has

seven processing lines that run continuously. Each process line is similar, except for a line dedicated to processing protein from bones. The unit operations for the process lines consists of the following:

- The meat is ground in a series of grinders that can process 8,000 to 11,000 lbs.
- The ground meat and protein are blended in a large blender. Liquid nitrogen is used for contact cooling within the blender.
- Water may be added into the blender for moisture content.
- The protein is emulsified and passes through a metal detector.
- The ground and blended protein is used to fill up a 330-gallon combo or tote.
- The contents of the combos are frozen and then shipped.
- Note: the waste bone material from the bone-protein processing line is either recovered or sent back to JBS as bone meal.

The processing lines are cleaned with a water hose to knock off residual protein about 2 to 3 times a day. In addition, foam is/may be used to remove heavy protein built-up on the equipment. The wastewater enters a covered trench that leads to the wastewater treatment system. The facility uses squeegees and shovels to remove protein, and the floor is also continuously rinsed to the trench. The facility performs a deep cleaning for each line every 48 hours on a rotating basis, resulting in at least one line being deep cleaned nightly. The facility has a 3,000-gallon dump trailer for solids collection and transported off-site. Spoils from the processing area are also collected in the 3,000-gallon dump trailer.

The wastewater is transported via a conveyance trench to the waste treatment system. The waste treatment system is located in an attached satellite room located south of the processing area. The wastewater enters an aerated 4,500-gallon pit which is pumped to a coarse bar screen and a Lyco drum screen to separate solids and provide clarification of the wastewater. The solids are removed and collected in the 3,000-gallon dump trailer. The dump trailer transports the solids off-site about once per day.

The clarified wastewater from the screening process is piped to a 5,000-gallon two chamber grease interceptor and is discharged though outfall 01.

EPA Classification of the Industrial User

Based on observations and information received during the inspection, the facility is categorized as a significant industrial user, subject to the City of Greeley's local limits.

Summary of Findings

Protein for Pets
NPDES ID# COPU00174
January 30, 2024

Pretreatment Inspection Findings	Follow up Action Items
1. No corrective action items identified.	

Report Review and Signature		
Drafter Name	Address/Phone Number	Date
Al Garcia	U.S. EPA Region 8 1595 Wynkoop Street 8WD-CWW Denver, Colorado 80202 303-312-6382	02/08/24
Reviewer Name	Address/Phone Number	Date
Stephanie Passarelli	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NP Denver, Colorado 80202 303-312-6803	02/12/24
Supervisor Signature/Name	Address/Phone Number	Date
 Digitally signed by MICHAEL BOEGLIN Date: 2024.02.14 07:23:43 -07'00'	U.S. EPA Region 8 1595 Wynkoop Street 8WD-CWW Denver, Colorado 80202 303-312-6250	02/14/2024
Michael Boeglin		