



NPDES Pretreatment Compliance Sampling Inspection Report

Saputo Dairy Foods USA, LLC
40236 Highway 10
Delhi, New York

NYP00898

June 29-30, 2022

Report Prepared by:

**ROBERT
MORRELL** Digitally signed by
ROBERT MORRELL
Date: 2022.08.26
10:51:12 -04'00'

Robert Morrell, Geologist
Monitoring Operations Section

Date: _____

Report Approved by:

**PHILIP
COCUZZA** Digitally signed by PHILIP
COCUZZA
Date: 2022.08.26 10:54:48
-04'00'

Philip Cocuzza, Chief
Monitoring Operations Section

Date: _____

1.0 OBJECTIVE

On June 29-30, 2022, at the request of the Water Compliance Branch, the United States Environmental Protection Agency (USEPA) conducted a National Pollutant Discharge Elimination System (NPDES) Pretreatment Compliance Sampling Inspection (CSI) at Saputo Dairy Foods USA in Delhi, New York. The objective of the CSI was to gather information necessary to determine compliance with the general pretreatment requirements of 40 CFR Part 403 and the industrial user agreement with the Village of Delhi Wastewater Treatment Plant.

2.0 KEY PARTICIPANTS

Listed below are key inspection participants and contact information, grouped by organization.

U.S. Environmental Protection Agency
Robert Morrell, Geologist, Lead Inspector
Morrell.robert@epa.gov, 732-906-6804
Thuan Tran, Physical Scientist
Tran.thuan@epa.gov, 732-321-4455
Neal Johansen, Physical Scientist
Johansen.neal@epa.gov, 732-321-6691

Saputo Dairy Foods USA, LLC
Scott Possemato, Operations Manager
Scott.possemato@saputo.com, 607-278-3071
Seine Wingfield, Wastewater Supervisor
Lee Dudley, Maintenance Coordinator

3.0 FACILITY DESCRIPTION

3.1 General Information

Saputo Dairy Foods USA is located at 40236 State Highway 10 in Delhi, New York. The facility is a manufacturer of dairy products, including fluid milks, heavy creams, and aerosol creams. The company is categorized as Standard Industrial Classification (SIC) Code 2026 (Fluid Milk). The plant operates 24 hours per day, 7 days per week.

3.2 Process Information

Raw milk and cream are delivered to the facility in bulk by tank trucks. The raw product is then processed and pasteurized in batch tanks to produce the final products. The facility manufactures approximately 800,000 pounds of milk products per day.

Process water for the facility is provided by an on-site well. The well water is treated and disinfected by injection of sodium hypochlorite. Industrial wastewater is generated from the clean-in-place (CIP) process for the batch product tanks and lines. Acid and caustic solutions are used in the CIP process. CIP wastewater from the ultra-high temperature pasteurizers is a large source of wastewater. Other sources include steam-in-place (SIP) wastewater and truck bay drains.

Process wastewater flows into a lift station, where it is pumped to a 200,000-gallon raw surge tank. The wastewater flows through a screen to remove solids and enters the equalization tank. The wastewater is conveyed to the primary DAF (dissolved air floatation) tank. The liquid from the primary DAF tank flows into a buffer tank before entering the MBBR (moving bed biofilm reactor). Wastewater from the MBBR flows into an aeration tank and then a final surge tank. A polymer and a coagulant are added in two mixing chambers before the wastewater enters the final clarifier. The wastewater is conveyed to the secondary DAF tank. Finally, the treated wastewater is discharged to a pumping station, where it mixes with wastewater from Friesland Campina, and the combined wastewater is pumped to the Village of Delhi Wastewater Treatment Plant. Average flow is approximately 200,000 gallons per day.

Sludge from the primary DAF tank is collected in a sludge tank. Sludge from the final clarifier and the secondary DAF tank is pumped to the aerobic digester. The sludge from the sludge tank and the digester is land applied by a third party.

3.3 Facility Self-Monitoring Information

Pretreatment wastewater samples are collected by the Village of Delhi WWTP personnel. 24-hour composite samples are collected three times per week for the analysis of 5-day carbonaceous biochemical oxygen demand (CBOD₅), total suspended solids (TSS), phosphorus, and ammonia. 24-hour composite samples are collected twice per month for total dissolved solids (TDS). Grab samples are collected once per day for pH and total residual chlorine. Flow is monitored continuously. Samples are analyzed by Phoenix Laboratories.

4.0 EPA SAMPLING/INSPECTION ACTIVITIES

4.1 Sampling Activities

An automatic composite sampler was set up at the pretreatment discharge location. The sampler was programmed to collect an aliquot of the effluent wastewater every 15 minutes for 24 hours. After 24 hours, the automatic composite sampler was disassembled and the composite sample jug was mixed thoroughly before filling the sample containers. The 24-hour composite sample was analyzed for CBOD₅, TSS, phosphorus, ammonia, and TDS.

Grab samples were collected and analyzed in the field for pH, temperature, and total residual chlorine. The 24-hour flow was recorded from the totalizer.

All sample containers, preservation techniques, and holding times were in accordance with U.S. EPA requirements specified in 40 CFR Part 136. All samples were placed in a cooler with wet ice and transported to the U.S. EPA Region 2 Laboratory in Edison, New Jersey.

Split samples were collected and given to the facility representative.

5.0 ANALYTICAL RESULTS

Saputo Dairy Foods USA Pretreatment CSI June 29-30, 2022

Parameter	Discharge to POTW	Local Discharge Limit – Daily Maximum
Total Residual Chlorine (mg/l)	0.13	0.5
pH (su)	7.65	6.0 – 10.0
Temperature (°C)	30.7	--
Flow (gpd)	180,000	260,000
CBOD ₅ (mg/l)	64.2	400
TSS (mg/l)	24.0	400
Phosphorus (mg/l)	0.344	20
Ammonia (mg/l)	0.164	20
TDS (mg/l)	986	1000

6.0 FINDINGS

6.1 Sampling Result Findings

Analytical results indicate that all parameters in the industrial user agreement did not exceed daily maximum discharge limitations during the 24-hour sampling survey.

There was no flow at the two stormwater outfalls (002 and 003) during the 24-hour survey.

Outfall 001 (SPDES NY0068292), which consisted of non-contact cooling water, has not discharged since March 31, 2022. The non-contact cooling water is now regenerated and is not discharged.

7.0 ATTACHMENTS

Photograph (#1)
Laboratory Data Report
Chain of Custody / Field Data Form

Photo #1: View of the pretreatment discharge location where samples were collected.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**Region 2 Laboratory
2890 Woodbridge Avenue
Edison , New Jersey 08837
732-906-6886 Phone
732-906-6165 Fax**

July 12, 2022

Bob Morrell
Monitoring & Assessment Branch
LSASD/MAB
Edison, NJ 08837

RE: Saputo Dairy Foods - 2206034

Enclosed are the results of analyses for samples received by the laboratory on 06/30/2022. The signature below reflects the laboratory's approval of the reported results. If you have any questions concerning this report, please refer to Project Number 2206034 and contact the laboratory.

Sincerely,

A handwritten signature in black ink, appearing to read "John R. Bourbon".

John R. Bourbon
Chief, LSASD/LB



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 2 Laboratory

Final Report

Project: Saputo Dairy Foods - 2206034

Project Number: 2206034

Project Narrative:

The National Environmental Laboratory Accreditation Conference Institute (TNI) is a voluntary environmental laboratory accreditation association of State and Federal agencies. TNI established and promoted a National Environmental Laboratory Accreditation Program (NELAP) that provides a uniform set of standards for the generation of environmental data that are of known and defensible quality. The EPA Region 2 Laboratory is NELAP accredited. The Laboratory tests that are accredited have met all the requirements established under the TNI Standards.

Condition Comments

None

Comment(s):

The "Sample Analysis Date and Time" is included in the results section for any analyte with a prescribed holding time of 72 hours or less.

Data Qualifier(s):

- U- The analyte was not detected at or above the Reporting Limit.
- J- The identification of the analyte is acceptable; the reported value is an estimate.
- K- The identification of the analyte is acceptable; the reported value may be biased high.
- L- The identification of the analyte is acceptable; the reported value may be biased low.
- NJ- There is presumptive evidence that the analyte is present; the analyte is reported as a tentative identification. The reported value is an estimate.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 2 Laboratory**

Final Report

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Reporting Limit(s):

The Laboratory was able to achieve the appropriate limit for each analyte requested.

SUMMARY REPORT FOR SAMPLES

Field ID	Laboratory ID	Matrix	Date Sampled	Date Received
Disch. to POTW	2206034-01	Aqueous	06/30/2022 09:50	06/30/2022 17:00



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 2 Laboratory

Final Report
Project: Saputo Dairy Foods - 2206034
Project Number: 2206034

SUMMARY REPORT FOR METHODS

Analysis	Method	Certification	Matrix
Ammonia [As N]	EPA 350.1 SOP C-80 Rev 2.7	NELAP	Aqueous
Biochemical Oxygen Demand, Carb.	SM 5210B SOP C-21 Rev 2.7	NELAP	Aqueous
Phosphorus	EPA 365.1 SOP C-68 Rev 2.7	NELAP	Aqueous
Residue, Filterable	SM 2540C SOP C-37 Rev 2.7	NELAP	Aqueous
Residue, Non-Filterable	SM 2540D SOP C-33 Rev 3.7	NELAP	Aqueous



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 2 Laboratory

Final Report
Project: Saputo Dairy Foods - 2206034
Project Number: 2206034

Analyte	Result	Qualifier	Reporting Limit	Units	Batch	Date and Time of Analysis*
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Field ID: Disch. to POTW

Sample ID: 2206034-01

Sanitary

Ammonia [As N]	0.164		0.100	mg/L	B207008	
Biochemical Oxygen Demand, Carb.	64.2		2.00	mg/L	B207002	07/06/2022 07:44
Phosphorus	0.344		0.0500	mg/L	B207039	
Total Dissolved Solids	986		10.0	mg/L	B207004	
Total Suspended Solids	24.0		10.0	mg/L	B207005	



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 2 Laboratory**

Final Report

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Sanitary - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch B207002									
Blank (B207002-BLK1)									
Biochemical Oxygen Demand, Carb.	--- U	2.00	mg/L						
LCS (B207002-BS1)									
Biochemical Oxygen Demand, Carb.	176		mg/L	198.0		88.8	84.6-115.4		
LCS (B207002-BS2)									
Biochemical Oxygen Demand, Carb.	172		mg/L	198.0		86.7	84.6-115.4		
LCS (B207002-BS3)									
Biochemical Oxygen Demand, Carb.	179		mg/L	198.0		90.5	84.6-115.4		
Duplicate (B207002-DUP1) Source: 2206033-01									
Biochemical Oxygen Demand, Carb.	2.32	2.00	mg/L		2.10			9.87	25
Matrix Spike (B207002-MS1) Source: 2206022-03									
Biochemical Oxygen Demand, Carb.	512	2.00	mg/L	396.0	57.3	115	75-125		
Matrix Spike Dup (B207002-MSD1) Source: 2206022-03									
Biochemical Oxygen Demand, Carb.	460	2.00	mg/L	396.0	57.3	102	75-125	10.5	200
Batch B207004									
Blank (B207004-BLK1)									
Residue, Filterable	--- U	10.0	mg/L						
Blank (B207004-BLK2)									
Residue, Filterable	--- U	10.0	mg/L						



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch B207004									
LCS (B207004-BS1)									
Residue, Filterable	325	10.0	mg/L	325.0		100	85-115		
LCS Dup (B207004-BSD1)									
Residue, Filterable	319	10.0	mg/L	325.0		98.2	85-115	1.86	20
Duplicate (B207004-DUP1) Source: 2206034-01									
Residue, Filterable	979	10.0	mg/L		986			0.712	20
Batch B207005									
Blank (B207005-BLK1)									
Residue, Non-Filterable	--- U	10.0	mg/L						
Blank (B207005-BLK2)									
Residue, Non-Filterable	--- U	10.0	mg/L						
LCS (B207005-BS1)									
Residue, Non-Filterable	53.0	10.0	mg/L	54.30		97.6	85-115		
LCS (B207005-BS2)									
Residue, Non-Filterable	56.0	10.0	mg/L	54.30		103	85-115		
LCS Dup (B207005-BSD1)									
Residue, Non-Filterable	56.0	10.0	mg/L	54.30		103	85-115	5.50	20
LCS Dup (B207005-BSD2)									
Residue, Non-Filterable	54.0	10.0	mg/L	54.30		99.4	85-115	3.64	20



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Region 2 Laboratory**

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Sanitary - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch B207005									
Duplicate (B207005-DUP1)		Source: 2206033-01							
Residue, Non-Filterable	--- U	10.0	mg/L		4.00				20
Batch B207008									
Blank (B207008-BLK1)									
Ammonia [As N]	--- U	0.100	mg/L						
Blank (B207008-BLK2)									
Ammonia [As N]	--- U	0.100	mg/L						
LCS (B207008-BS1)									
Ammonia [As N]	14.7	1.00	mg/L	14.90		99	90-110		
LCS (B207008-BS2)									
Ammonia [As N]	14.6	1.00	mg/L	14.90		98	90-110		
LCS Dup (B207008-BSD1)									
Ammonia [As N]	14.6	1.00	mg/L	14.90		98	90-110	0.7	20
LCS Dup (B207008-BSD2)									
Ammonia [As N]	14.8	1.00	mg/L	14.90		99	90-110	1	20
Matrix Spike (B207008-MS1)		Source: 2206022-01							
Ammonia [As N]	9.88	0.100	mg/L	5.000	7.83	41	90-110		
Matrix Spike (B207008-MS2)		Source: 2206033-01							
Ammonia [As N]	5.00	0.100	mg/L	5.000	0.0795	98	90-110		



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Sanitary - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch B207008									
Matrix Spike (B207008-MS3)		Source: 2206034-01							
Ammonia [As N]	4.97	0.100	mg/L	5.000	0.164	96	90-110		
Batch B207039									
Blank (B207039-BLK1)									
Phosphorus	--- U	0.0500	mg/L						
Blank (B207039-BLK2)									
Phosphorus	--- U	0.0500	mg/L						
LCS (B207039-BS1)									
Phosphorus	2.23	0.250	mg/L	2.220		100	90-110		
LCS (B207039-BS2)									
Phosphorus	2.27	0.250	mg/L	2.220		102	90-110		
LCS Dup (B207039-BSD1)									
Phosphorus	2.24	0.250	mg/L	2.220		101	90-110	0.4	20
LCS Dup (B207039-BSD2)									
Phosphorus	2.26	0.250	mg/L	2.220		102	90-110	0.4	20
Matrix Spike (B207039-MS1)		Source: 2206034-01							
Phosphorus	1.31	0.0500	mg/L	1.000	0.344	97	90-110		
Matrix Spike (B207039-MS2)		Source: 2206022-05							
Phosphorus	2.50	0.250	mg/L	1.000	1.69	81	90-110		



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Region 2 Laboratory

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Sanitary - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
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Batch B207039

Matrix Spike (B207039-MS3)

Source: 2206033-01

Phosphorus	2.28	0.250	mg/L	1.000	1.41	87	90-110		
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US EPA REGION 2 LABORATORY
CHAIN OF CUSTODY/ FIELD DATA FORM

SURVEY NAME & LOCALITY Saputo Dairy Foods - Delhi, NY
 PROGRAM: SF : SITE ID _____ OPERABLE UNIT _____

PROJECT LEADER Bob Morrell
 PROGRAM RESULTS CODE _____

Decision Unit Code Y206 RCRA D210 RCRA ENF D307 NPDES B304 SDWA C215 AM B224 CAA A305 TSCA L306 OD B253 FIFRA CRIMINAL ENF

Permit #: <u>Pretreatment</u>	CONCENTERS # OF	MATRIX	CHECK IF SPLIT SAMPLE	DESCRIPTION & INSTRUCTIONS INCLUDING LOCATION, ESTIMATED CONCENTRATIONS, SPECIAL REPORTING LIMITS.	Res CL Checked	Preservative (circle)	Collection Time (24hr clock) //////////		Collection Date mm/dd/yy
							Begin	End	
<u>Disch. to POTW</u>	<u>6</u>	<u>A</u>	<input checked="" type="checkbox"/>	<u>2 1-liter plastic jars for CBODs</u>	<input checked="" type="checkbox"/>	<u>0</u>	<u>0950</u>		<u>06/29/22</u>
			<input checked="" type="checkbox"/>	<u>1 500-ml plastic jar for TSS</u>	<input checked="" type="checkbox"/>	<u>0</u>		<u>0950</u>	<u>06/30/22</u>
			<input checked="" type="checkbox"/>	<u>1 125-ml plastic jar for Phosphorus</u>	<input checked="" type="checkbox"/>	<u>0</u>			
			<input checked="" type="checkbox"/>	<u>1 125-ml plastic jar for Ammonia</u>	<input checked="" type="checkbox"/>	<u>0</u>			
			<input checked="" type="checkbox"/>	<u>1 500-ml plastic jar for TDS</u>	<input checked="" type="checkbox"/>	<u>0</u>			
			<input type="checkbox"/>		<input type="checkbox"/>	<u>0</u>			
			<input type="checkbox"/>		<input type="checkbox"/>	<u>0</u>			
			<input type="checkbox"/>		<input type="checkbox"/>	<u>0</u>			

COMMENTS & SPECIAL REQUIREMENTS:

Preservative Added & Checked
 0=ice 7=FAS
 1=H2SO4 pH<2 8=ZnAc
 2=HNO3 pH<2 9=NaOH pH>12
 3=HCl pH<2 10=NH4Cl
 4=Na2S2O3
 5=NaOH pH>9
 6=Ascorbic Acid

Matrix: A=aqueous F=multiphasic B=aqueous (chlorinated) G=solvent C=soil H=biota D=sediment I=oil E=sludge J=other	Relinquished By: <u>Robert A. Morrell</u>	Person Assuming Responsibility for Sample(s): <u>Robert A. Morrell, Jr.</u>	<u>0950</u>	<u>6/30/22</u>
	Relinquished By:	Received By: <u>[Signature]</u>	<u>17:00</u>	<u>6/30/22</u>
	Relinquished By:	Received By:		

Survey Complete? Y N

Direct Snow Sampling, chilling initiated @ 6/30/22