

U.S. Environmental Protection Agency Region 5

Purpose: Industrial User Pretreatment Compliance Inspection

Facility: Perdue Foods, LLC (Perdue)
65 South 200 West
Washington, Indiana 47501

Inspection Date: April 13, 2022

EPA Representatives:

Rajen Patel, Environmental Engineer, 312-886-5741
Valerie Dooling, Environmental Engineer, 312-886-7167

Facility Representatives:

Brandon Bottorff, Director of Operations, 812-617-2189
Neil Powel, Regional Environmental Manager, 704-754-0970
Todd Logan, Environmental Compliance Manager, 812-259-5174
Ron Adams, Wastewater Supervisor, 812-254-8566

Report Prepared by:

Rajen Patel
Water Enforcement and Compliance Assurance Branch, Section 2
patel.rajn@epa.gov

Inspector Signature: RAJEN PATEL Digitally signed by RAJEN PATEL
Date: 2022.06.08 12:40:47 -04'00'

Approver Name and Title: Ryan Bahr, Section 2 Supervisor
Water Enforcement and Compliance Assurance Branch

Approver Signature and Date: Bahr, Ryan Digitally signed by Bahr, Ryan
Date: 2022.06.08 13:26:41 -05'00'

BACKGROUND

The purpose of the inspection was to describe, evaluate, and document compliance with the Clean Water Act (CWA) and associated pretreatment regulations with respect to the Perdue Foods facility located at 65 South 200 West, Washington, Indiana 47501 (facility).

There are two entities (Approval and Control Authority) that have the responsibility to develop and implement the federal pretreatment program.

An Approval Authority is either the state Director of a National Pollutant Discharge Elimination System (NPDES) in an authorized state with an EPA-approved pretreatment program or the EPA Regional Administrator in a state without an approved pretreatment program. A Control Authority is either a Publicly Owned Treatment Works (POTW) with an approved pretreatment program or the Approval Authority for any POTW that does not have an approved program.

The State of Indiana and City of Washington POTW do not have an EPA-approved pretreatment program. EPA is the Control Authority in Indiana and has enforcement authority pertaining to the pretreatment requirements at Perdue Foods.

EPA has developed nationally applicable pretreatment standards under CWA section 307(b) in its General Pretreatment Regulations for Existing and New Sources of Pollution at 40 (Code of Federal Regulations) CFR Part 403. Such pretreatment standards are directly applicable to indirect dischargers based on the processes conducted at the facilities and the applicability of those standards. Perdue Foods is a Significant Industrial User (SIU) as per 40 CFR 403.3. The discharges to the City of Washington POTW are subject to the applicable local Sewer Use Ordinance (SUO) Limitations and surcharges.

The effluent standards for the poultry processor, which are contained in 40 CFR 432, Subpart K - Poultry First Processing, § 432.110 applies to the discharges of process wastewater resulting from the slaughtering of poultry, further processing of poultry and rendering of material derived from slaughtered poultry. Process wastewater includes water from animal holding areas at these facilities.

Perdue Foods also has an Industrial Wastewater Pretreatment (IWP) Permit (Permit Number INP000176) issued by the Indiana Department of Environmental Management (IDEM) which contains effluent limitations, monitoring requirements and other conditions. The facility discharges into the Washington POTW. The current permit is valid through May 31, 2023.

The facility falls primarily under Standard Industrial Classification (SIC) Code 2015 “Poultry Slaughtering and Processing”. Facilities under this SIC are subject to IDEM Rule 6 for stormwater and Perdue submitted a Notice of Intent (NOI) to comply with the terms and requirements of the rule. Perdue’s stormwater run-off is discharged through a point source to waters of the US (to Hawkins Creek just a few blocks south of the facility, which connects to the White River two miles west of the facility). Perdue has developed, implemented, updated, and maintained a Stormwater Pollution Prevention Plan (SWPPP). The facility does not have a stormwater permit. Hawkins Creek has been listed as impaired for “biota” on the latest Indiana

303(d)List; however, no Total Maximum Daily Load (TMDL) has been developed for Hawkins Creek.

SITE INSPECTION

Opening Conference

EPA representatives entered the facility at 8:30 am on April 13, 2022. IDEM regional inspectors Holly Zurcher and Jeremy Ferguson joined the EPA team for this inspection. We signed in at the reception desk and were greeted by Tom Logan, the facility's Environmental Compliance Manager and Ron Adams, Wastewater Supervisor at Perdue.

Mr. Logan escorted us to a large conference room and introduced us to Brandon Bottorff, the facility's Director of Operations and Neil Powel, Perdue's Regional Environmental Manager. The EPA inspection team presented credentials to the facility representatives and began the opening conference at 8:50 pm. I explained to the Perdue representatives that EPA was performing the CWA compliance evaluation inspection of the facility operations and we would evaluate its wastewater discharges and take photos during the inspection. I also advised the facility that confidential business information (CBI) may be declared for materials reviewed during the inspection. The facility did not request any specific CBI. I informed the facility representatives that they would receive copies of the photographs collected during the inspection as an attachment to the inspection report. Since there was a chance of a heavy rain later in the morning, we started with a facility walk-through and toured the majority of the plant's operations by accessing each process area from outside of the building. The facility tour ended around 10:30 am. After a short break, we began the opening conference at 10:40 am and continued the discussion about the facility's background, manufacturing processes, preventative maintenance program, wastewater treatment process, and review of the facility's compliance reporting history (preventative maintenance log, sampling data and Monthly Monitoring Reports (MMRs) for 2021).

Facility Background

I asked Mr. Bottorff about the nature of products and the company's history of operations. He stated that Perdue has owned and operated its Washington plant since 1985. The plant was originally constructed in 1965. Perdue bought the facility from Shenandoah Farms in 1985. This facility is Perdue's only turkey process plant in the US. Other nation-wide Perdue facilities process chicken and hogs. Perdue has been in operation for the past 102 years. It is family-owned and a 3rd generation company. It is the 4th largest meat company in the US.

The facility (20-acres) site map (Attachment II) shows facility boundaries, onsite drainage conveyances and direction of flow, identification of impervious and pervious surfaces, existing structural control measures and identification of areas of raw material, final products, processing areas, waste materials, chemicals and oil storage areas. Mr. Bottorff stated that there are six US Department of Agriculture (USDA) inspectors on site ensuring compliance on each process step involving the food safety.

Mr. Bottorff stated that Perdue Foods normally operates three shifts per day (5am-2pm; 2pm-11pm and 11pm – 5am), five days a week (may operate 6th day during peak demand), with no longer-period (week or more) of scheduled shutdowns for maintenance or process modifications. Maintenance is primarily done on weekends. Mr. Bottorff added that 870 employees work at the facility and their production remains steady, for the most part, throughout the year.

Process Description

The facility processes poultry products. Plant processes include washing, slaughtering, deboning, chilling, and shipping of poultry. An average 4.7 million pounds of turkeys get processed each week. Products are ground (raw) turkey and food service (ready to cook). Products are sold to supermarkets and restaurants.

Live turkeys are delivered to the facility via truck and are slaughtered, eviscerated, and processed into various fresh and frozen turkey meat products. Whole turkeys are not processed at the facility. Birds come from Perdue Breeder in Thorntown and Perdue Hatchery in Vincennes, then to one of the Perdue grow-out farms which are located in a 90-mile radius. It takes a bird about 20 weeks from hatch to be ready for slaughter.

A schematic process wastewater flow diagram was not available at the time of the inspection. Mr. Powell sent (via email) the attached wastewater flow diagram (Attachment III) on April 20, 2022.

Approximately one-million-gallons of water is used daily. Of that, about 80% gets used for the Harvest/ Evisceration step. The rest is used in deboning and sanitation. Sanitation uses approximately 100,000 gallons per day. The chillers are filled with approximately 100,000 gal of freshwater and are emptied daily. The chillers are dumped between midnight and 4am. There will be a rise in the equalization (EQ) tank at that time.

In 2016, the facility remodeled its Evisceration line to increase product yield (without the increase in raw material) and decreasing the usage of water by an average of 4 to 5% each year. Mr. Powell stated that Perdue has an established “Environmental Sustainability” 5-year (2018 - 2023) goal to reduce its water usage by 25% for all of its facilities nationwide. Perdue’s Washington facility is on track to meet the goal by 2023. The facility has reduced its water usage by 20% from its 2018 levels (41.6 gallons per bird down to 33.4 gallons per bird at present) and expects to meet the goal (31.2 gallons/bird) ahead of the 2023 deadline. Ms. Dooling asked if the facility noted any increase in concentration of pollutants due to decrease in the water usage. Mr. Powell stated that they have noted a reduced surcharge (reduced quantity of pollutants) and a reduction in discharge volumes to the POTW.

Perdue provided EPA with production in incoming pounds; however, they do measure production in Without Giblets (WOG) pounds which is weight prior to deboning. Perdue processes more product in the beginning of the year and in November (Thanksgiving). They attribute this to an increase in new year’s resolutions to eat healthier and replace red meat with turkey.

The maintenance department staffs 30 employees and is led by a maintenance and reliability district manager who is responsible for finding and repairing parts or equipment that are malfunctioning. Preventative maintenance is scheduled each day and maintenance employees are assigned a daily rounds packet. If additional maintenance is needed, then it is then scheduled into the planner and assigned in the packet. Mr. Patel and Ms. Dooling reviewed facility's preventative maintenance and actual repair records for a randomly selected month of March 2021. The midnight shift (11 pm to 5 am) is a sanitation shift managed by an outside company. During the sanitation shift, each process equipment is sanitized prior to the start of 5 am morning shift.

During our review of the MMRs, IDEM inspectors noted that Perdue had erroneously reported the Oil and Grease (O&G) sampling results on its March 2021 MMR. The data was submitted as 180.92 pounds per day instead of the actual 21.1mg/L and 143.7 pounds per day instead of the actual 17.9 mg/L. These values are below the 100 mg/L permitted for O&G, but Perdue had incorrectly reported these values as being above the permit effluent limits.

EPA and IDEM also reviewed the facility's "evidence book" which records information on bypass and overflow events and surcharges paid by Perdue. During the EPA, Ms. Dooling noted that the facility had reported three bypass events (all in 2020 and none in 2021). The facility claimed that the remedial measures put in place after the 2020 bypass events resulted in no bypass event in all of 2021 and first quarter of 2022.

One bypass event resulted in (up to) 700 gallons of overflow from the nurse tank into the process area pit, which the bypass report claims was contained. The second bypass event resulted in about 1,500 gallons of wastewater overflow from the EQ tank to an adjacent drain designed to capture such EQ overflow and pipe it back to the North Offal pit/area where it gets mixed with the process wastewater. The report stated that the EQ overflow occurred on a weekend due to an alarm malfunction on the EQ tank. After that incident, a backup alarm was installed on the EQ tank. The third bypass event took place in the chemical storage area. The facility estimates up to 100 gallons of Ferric Chloride may have spilled on the floor due to a leak in its stainless-steel feedline. The report stated that the facility had repaired the pipe damage and stopped the leak. The operator had contained the area with sandbags and berms and called the vacuum truck for cleaning the area. The facility reported in bypass/overflow reports to IDEM (attachment VII) that no amount of spill reached the stormwater outfall.

We also reviewed facility records of its sludge which is transported to an offsite lagoon for drying prior to the land application. The facility has contracted the sludge transport and land application with the Wealing Brothers. Mr. Logan stated that the facility had made progress in terms of reducing the weekly amount of transported sludge (down from 15 trucks per week to an average 10 trucks per week now). Mr. Bottorff stated that Perdue invests an average of \$2 million annually at this facility for capital improvement projects. As a part of its 2022 capital improvements plan, Perdue has procured a 20,000-gallon sludge holding and decanting tank with a goal to reduce the amount of sludge decant down to 5 truckloads per week, and an annual \$200,000 in savings from reduced sludge amount.

The Dissolved Air Floatation (DAF) unit is designed to treat up to 800 gallons per minute of wastewater. It was originally an O&G separator unit that got converted to a DAF unit and is aging, according to Mr. Bottorff. He stated that Perdue is also in the process of purchasing a new DAF control (AFCO unit) by 2025 which is expected to reduce the chemical usage and be more efficient by saving manpower. Perdue has also procured an autosampler system to sample and analyze Total Suspended Solids (TSS). It is expected to be installed in June 2022. Perdue also showed EPA a purchase order for a backup blower for the EQ basin which was approved on April 8, 2022.

The facility installed sluice gates at stormwater outfalls 2 and 3 on the south side of the facility (Attachment IV) to regulate the flow of stormwater from the outdoor operations area. Stormwater from the areas outside the main plant and adjoining support operations flow to the ditches on the south and west side of the property then to outfalls 2 and 3. Mr. Logan stated that staff is responsible for checking the quality of the stormwater (odor, appearance, oil sheen) during a rain event and prior to opening the sluice gates which allow stormwater to flow from the ditches through outfalls 2 and 3. It was raining at the time of inspection and both the sluice gates 2 and 3 were raised open partially to let the stormwater flow through the stormwater outfalls 2 and 3 respectively. The staff would not open the sluice gate in the event the stormwater quality meets any of the criteria of an “unpermitted discharge” per the facility SWPPP. Stormwater outfalls 1 and 2 only receive stormwater from the parking lot areas (not from the operations areas). Hence, there are no sluice gates installed at outfalls 1 and 2. The facility stormwater discharges flow to the Hawkins Creek just south of the facility. Photo 45 shows the stormwater ditch leading to Sluice Gate 2, the gate for outfall 2.

Perdue’s pretreatment system consists of the separation of renderables (waste meat and bones from wastewater), two rotating screens, polymer addition, and a grit chamber with the ability to skim solids. Ferric Chloride is used as a coagulant. Renderables are hauled off-site for animal feed. Solids are removed from the grit chamber unit and used for land application. Sampling is conducted directly after the grit chamber unit.

The process waste stream averages 877,750 gallons per day (GPD) from poultry processing operations. Process wastewater is generated by overflow and daily emptying of scalders and chillers, continuous washing and cleaning of poultry carcass and parts, employee hand washing, continuous spray washers on product conveyors, and clean-up operations.

In addition to process waste stream(s), air scrubbers and ice makers generate an average of 46,000 GPD, cooling water averages 60,000 GPD, boiler blowdown generates 1,250 GPD, and sanitary wastewater generates 15,000 GPD.

When asked whether the facility was aware that the Sequential Batch Reactor (SBR) is down at the Washington POTW, Mr. Logan indicated that the facility staff was not aware of the POTW’s unit being down until the EPA inspection. Mr. Adams stated that in the past, the POTW’s Superintendent Scott Rainey would communicate with Perdue once or twice a year. Since Mr. Rainey’s retirement last fall, Perdue has not had any communication with the POTW staff.

Facility Walk-Through

Mr. Bottorff, Mr. Powell, Mr. Logan, Mr. Adams, and the IDEM inspectors joined us during the facility walk-through. We began the walk-through at 9:00 am. Mr. Logan escorted us to the North Offal processing area located on the north-east portion of the facility and showed us the initial processing of slaughtered turkey's feathers and meat separation (photos 3, 38, 39, 40). All process wastewater from the North Offal process area flows into the floor drain (also referred to as "North Pit" – photos 1 & 41). Wastewater from pump overflow also enters the north pit (photo 5). The feather and waste meat disposal trucks continuously drip a small amount of wastewater that flows back into the drains (photos 2 & 6). Two 20-horsepower pumps pump the wastewater from the north pit up to the two overhead rotary screens that separates the solid meat materials and the feathers from the wastewater stream. The screen renderings are sent to a rendering facility offsite by DarPro.

The tour continued to the Offal Storage Area. We noticed a large concrete pad where the trucks are stored. The pad is sloped and is diked around the drain. Mr. Adams stated that this drain connects to the north pit (photo 9) and any water collected in the train would flow to and mix with the process wastewater in the north pit.

Mr. Logan then escorted us towards the "Live Cooling Shed" – a holding shelter (photo 15) for approximately 168,000 birds that are brought in to be processed each week. Both shelters are cleaned once a week and the wash water from the shelters flows to a drain (photo 16) that is connected to a manhole (photo 17) located between two shelters. Mr. Adams stated that the manhole pumps the water to the north pit.

The screened wastewater then enters the receiving tank (also referred to as "nurse tank" – photo 21) where two variable speed 40-horsepower pumps pump the wastewater to a 750,000-gallon EQ tank (photo 10 - also referred to as "flow equalization basin"). The EQ tank has two 75-horsepower blowers that aerate and mix the wastewater in the EQ tank. Mr. Logan showed us two alarms for the EQ tank level controls. One alarm is at 1 ½ panels from top and the other near the top (photos 13 & 14). EQ undergoes two cleaning cycles on weekends. The Wastewater Manager pumps the EQ tank down to ½ panel on Friday before leaving and a facility staff person is assigned to check the EQ tank before leaving each Friday. EPA noted that the EQ tank is on a sloped area and a drain (photo 11) located just southeast of the EQ tank would capture any overflow from the tank. Mr. Logan stated that this drain connects to the north pit. At the time of inspection, the EQ tank was ¾ full (photo 12).

Two 25-horsepower pumps pump the wastewater to the DAF unit (photo 25). Mr. Logan took us to the chemical storage shed where polymer (coagulant in a powder form) is mixed with water and cured before being added to the wastewater (photos 18 and 19). The chemical shed also housed two 3000-gallon tanks for Ferric Chloride (photo 20). Mr. Patel asked, and Mr. Logan confirmed that the chemical shed does not have any floor drains. Ferric Chloride and polymer are added to the wastewater prior to entering the DAF. In addition to chemicals stored in the chemical shed, a polymer used in the sludge decant process (photo 22) is also stored in the DAF building.

We then proceeded to the DAF unit area where chemicals and pressurized air goes through a flocculation tube and then enters the DAF (photo 23). Pressurized air, coagulants, and flocculants remove the pollutants from the wastewater and form a heavy sludge material that floats on the top of the water in the DAF unit. A moving set of blades skim the floating materials to the end of the DAF (photos 24 and 26) where it enters the sludge hopper. We noticed a floor drain in the DAF unit area and Mr. Logan stated that the drain connects to the north pit. A pump is used to remove the sludge from the hopper to a tanker truck outside the DAF building. Mr. Logan stated that the sludge decant drops into a square holding tank behind the truck (photo 7), which is used temporarily until a permanent 20,000-gallon sludge holding and decanting tank is installed outside the DAF building later this year. Decanted water is piped back to the nurse tank and then to the DAF unit for treatment (photo 8). When full, the truck transports the decanted sludge to a 3-million-gallon capacity sludge holding lagoon offsite, where the sludge is held (for further drying) until spring and fall and then land applied to land offsite.

The treated water is sampled as per the permit requirements just prior to a Parshall flume (photos 27 and 30) where the final discharge flow volume is measured. The flow is measured at an open pipe (photos 31 and 32), which is connected by a 2" pipe to the Parshall flume. A sampling rounds sheet is kept near the flow meter. EPA was provided a copy of the blank rounds sheet (photos 33 and 34). Ms. Dooling noted that the thermometer in the sample refrigerator measured that the temperature was not consistently below 6 degrees Celsius – also noted in IDEM's March 15, 2022, inspection report. Mr. Logan stated that an autosampler (to collect 24-hour flow proportional composite samples) is expected to be installed in June 2022. Facility discharge water finally enters the POTW located immediate south of the facility.

The facility collects a grab sample at the Parshall Flume location five times a week. Their pH sampler is calibrated once every week. The facility also collects samples for Total Kjeldahl Nitrogen (TKN), TSS O&G five days a week. Samples are stored in refrigerator prior to being picked up by the contract laboratory each Tuesday, Thursday, and Saturday. During the records review, the EPA team reviewed the chain of custody forms. Mr. Patel asked whether the facility has a slug discharge control plan and Mr. Powell stated that they did not and there is no record of the facility having a slug discharge situation.

As we continued our tour, we noticed a long trough (with drains) inbetween buildings (photo 44). According to Perdue, the drain is closed and is cleaned and pumped periodically to the wastewater treatment system (DAF unit). Mr. Adams stated that the trough gets cleaned once a month (during summer months – and that it is usually packed with snow in cooler months).

Before we ended the tour at the South Offal process area, we stopped by to inspect the stormwater ditch on the south side of the facility. Stormwater from the outdoor operations areas flow to outfall #2 (photo 45).

EPA viewed the south pit which had a similar setup as the north pit. Just outside the south wall of the building where the south pit is located, there is another long trough (photo 44) with drains. Perdue stated that similarly to the west end of this trough, the drains are sealed, and any liquid is periodically pumped back to the south pit. EPA noted there is some discoloration on the ground outside of the trough near the CO2 tanks.

After the south pit inspection, the EPA team walked by the parking lot and noted two open cleanouts with domestic sanitary waste visible. Perdue stated that the snowplow pulled up the drain covers, and they were not replaced. After completing the facility walk-through portion of the inspection, Mr. Bottorff escorted us to office meeting room for the closing conference.

Closing Conference

We began the closing conference at noon with Mr. Bottorff, Mr. Powell, Mr. Logan and Mr. Adams. Ms. Zurcher and Mr. Ferguson of IDEM were present at the closing conference. We discussed the following areas of concern:

The EPA and IDEM team observed – a pipe connected to the nurse tank leads directly to the final discharge point near the Parshall Flume bypassing the DAF treatment process. Neither Mr. Logan, Mr. Adams nor Mr. Powell knew the original reason the bypass was built, but it had been there (remained locked) for many years. IDEM inspectors confirmed that for the previous five years the bypass had been locked. Federal General Pretreatment regulations 403.17 (d) prohibits bypass (intentional diversions of waste streams from any portion(s) of the industrial user's facility treatment facility.

The sample refrigerator in the DAF unit building was observed to fluctuate above 6 degrees Celsius. 40 CFR 403.12(g)(5) states that all sampling analyses shall be performed in accordance with procedures contained in 40 Code of Federal Regulations (CFR) Part 136 and amendments thereto or with any other test procedures approved by the EPA Administrator. Part 136 procedures requires the samples be preserved at or below 6 degrees Celsius.

40 CFR 403.5 (a)(1) states that an industrial user may not introduce any pollutants into the POTW which cause Pass Through or Interference and 40 CFR 403.5 (b)(4) states that an industrial user may not introduce to the POTW any pollutant, including oxygen demanding pollutants, that is released in a Discharge at a flow rate or pollutant concentration which will cause Interference with the POTW. Perdue is the single largest source of wastewater flow volume (accounts for approximately 25% of City of Washington's total daily wastewater flow to its POTW). Perdue has not been in regular communication with the POTW management and operators to ensure that Perdue's wastewater loading does not create a pass through or cause interference at the POTW.

We also observed open cleanouts for the sanitary water flow leaving the facility. These open cleanouts pose a risk of stormwater entering the system or and process wastewater overflowing out.

EPA team requested the following information:

1. Wastewater flow diagram
2. Stormwater outfalls and Drain map
3. SWPPP
4. 2021 Monthly Surcharge Calculations
5. November 2021 Laboratory Wastewater Analysis

Within one week of the EPA inspection, Mr. Powell provided images (Attachment - V) addressing the DAF bypass removal, and images (Attachment - VI) addressing the open sanitary water clean outs and all of the above requested information from the closing conference.

We ended the closing conference and departed the facility at 12:30 pm.

List of Attachments

- I. Inspection photographs
- II. Site Map & Stormwater Drainage Diagram
- III. Process Wastewater Flow Diagram
- IV. Stormwater Outfalls 2 & 3
- V. DAF Bypass Removal – before and after
- VI. Sanitary Cleanout Removal – before and after
- VII. Bypass/Overflow Reports submitted to IDEM

Perdue Foods, LLC, 65 South 200 West, Washington, IN 47501
EPA Inspection April 13, 2022
All photos taken by Valerie Dooling, Environmental Engineer, U.S. EPA
Camera: RICOH WG-4 GPS
All times in Central time zone



1: RIMG0215
Description: Floor drains which lead to north pit.
Location: North Offal
Date/Time: April 13, 2022 – 7:57am



2: RIMG0216

Description: Feather and renderings disposal truck dripping wastewater that flows to the drains in Photo 1

Location: North Offal

Date/Time: April 13, 2022 – 7:58am



3: RIMG0217

Description: Feather and meat separator above north pit. Process wastewater is flowing into north pit.

Location: North Offal

Date/Time: April 13, 2022 – 7:58am



4: RIMG0218

Description: Legs and other renderings on conveyor drop into feather and meat separator above north pit

Location: North Offal

Date/Time: April 13, 2022 – 7:58am



5: RIMG0219

Description: Wastewater from pump overflow which enters the north pit

Location: North Offal

Date/Time: April 13, 2022 – 8:01am



6: RIMG0220

Description: Truck that receives meat dripping liquid which enters floor drains in photo 1

Location: North Offal

Date/Time: April 13, 2022 – 8:01am



7: RIMG0221

Description: Decant from the truck (temporary sludge press) drops into holding tank on outdoor concrete pad. Decant is pumped to the nurse tank.

Location: Outside Dissolved Air Flootation (DAF) building

Date/Time: April 13, 2022 – 8:05am



8: RIMG0222

Description: Decant hose which is pumped to the nurse tank

Location: Outside of DAF building

Date/Time: April 13, 2022



9: RIMG0223

Description: Trucks parked in an area that is sloped and bermed. Drain connects to the north pit.

Location: Offal Truck storage area

Date/Time: April 13, 2022 – 8:08am



10: RIMG0224

Description: 750,000-gallon Equalization (EQ) Tank

Location: Central portion of the facility

Date/Time: April 13, 2022 – 8:12am



11: RIMG0225

Description: Drain outside the EQ tank - pumped to the north pit

Location: Central portion of the facility

Date/Time: April 13, 2022 – 8:16am



12: RIMG0226

Description: EQ tank - $\frac{3}{4}$ full

Location: Central portion of the facility

Date/Time: April 13, 2022 – 8:17am



13: RIMG0227

Description: Two alarms on EQ tank

Location: Central portion of the facility

Date/Time: April 13, 2022 – 8:19am



14: RIMG0228

Description: Same as Photo 13

Location: Central portion of the facility

Date/Time: April 13, 2022 – 8:19am



15: RIMG0229

Description: Shelters for live birds

Location: Central portion of the facility

Date/Time: April 13, 2022 – 8:20am



16: RIMG0230

Description: Drain that connects to a pit to a manhole

Location: In between two shelters

Date/Time: April 13, 2022 – 8:21am



17: RIMG0231

Description: View down the shelter drain – pumps water to the north pit

Location: In between two shelters

Date/Time: April 13, 2022 – 8:22am



18: RIMG0232

Description: Polymer (powder form) mixed in the tank

Location: Chemical Shed adjacent to the nurse tank

Date/Time: April 13, 2022 -8:27am



19: RIMG0233

Description: Polymer mixing

Location: Chemical Shed adjacent to the nurse tank

Date/Time: April 13, 2022 – 8:27am



20: RIMG0234

Description: Two Ferric Chloride tanks

Location: Chemical Shed adjacent to the nurse tank

Date/Time: April 13, 2022 – 8:27am



21: RIMG0235

Description: Nurse tank on top left. Piping shown to right of nurse tank pumps wastewater to the EQ tank.

Location: Immediate South of the DAF unit building

Date/Time: April 13, 2022 – 8:31am



22: RIMG0236

Description: Chemical for sludge decant

Location: DAF unit building

Date/Time: April 13, 2022 – 8:33am



23: RIMG0237

Description: Addition of Ferric Chloride and Polymer to the wastewater prior to entering DAF

Location: DAF unit building

Date/Time: April 13, 2022 – 8:34am



24: RIMG0238

Description: DAF - sludge is skimmed off

Location: DAF unit building

Date/Time: April 13, 2022 – 8:36am



25: RIMG0239

Description: Wastewater is entering the DAF unit

Location: DAF unit building

Date/Time: April 13, 2022 – 8:36am



26: RIMG0240

Description: DAF sludge hopper (end of the DAF unit)

Location: DAF unit building

Date/Time: April 13, 2022 – 8:40am



27: RIMG0241

Description: Parshall Flume and grate

Location: DAF unit building

Date/Time: April 13, 2022 – 8:41am



28: RIMG0242

Description: Locked bypass upstream of Parshall Flume. Old bypass from the nurse tank.

Location: DAF unit building

Date/Time: April 13, 2022 – 8:46am



29: RIMG0243

Description: Sample holding refrigerator upstream of Parshall Flume

Location: DAF unit building

Date/Time: April 13, 2022 – 8:46am



30: RIMG0244

Description: Parshall Flume and older (not in operation) flow meter

Location: DAF unit building

Date/Time: April 13, 2022 – 8:47am



31: RIMG0245

Description: Flow meter. 2" pipe in Parshall Flume connecting flow meter pipe (bottom right).

Location: DAF unit building

Date/Time: April 13, 2022 – 8:49am

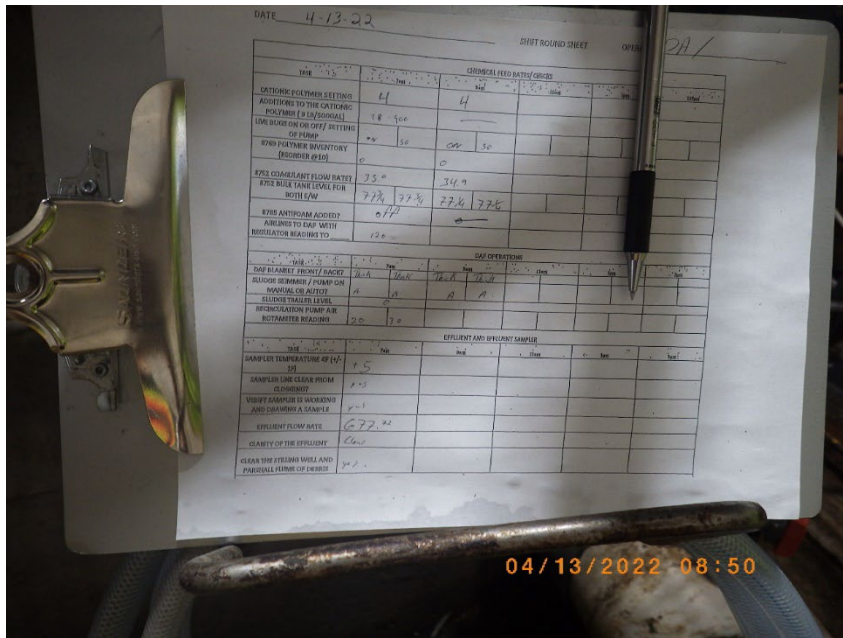


32: RIMG0246

Description: View down - showing pipe and flow meter and Parshall Flume

Location: DAF unit building

Date/Time: April 13, 2022 – 8:49am

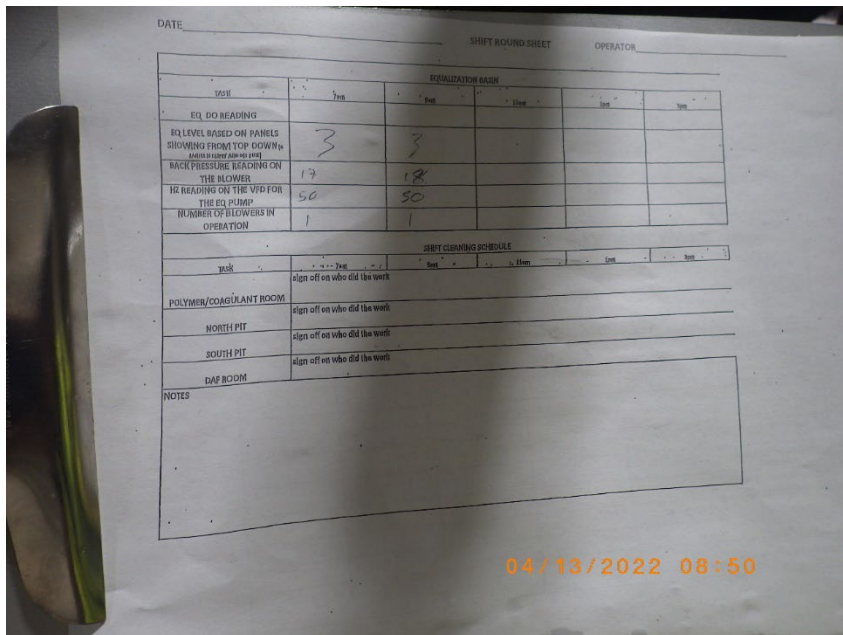


33: RIMG0247

Description: Front of Rounds sheet - located adjacent to flow meter

Location: DAF unit building

Date/Time: April 13, 2022 – 8:50am



34: RIMG0248

Description: Back page of Rounds sheet

Location: DAF unit building

Date/Time: April 13, 2022 – 8:50am



35: RIMG0249

Description: Vehicle loading and offloading

Location: Just north of the north offal

Date/Time: April 13, 2022 – 8:52am



36: RIMG0250

Description: Darker photo, same as photo 37 – Meat rendering separator

Location: North Offal

Date/Time: April 13, 2022 – 8:56am



37: RIMG0251

Description: Meat rendering separator

Location: North Offal

Date/Time: April 13, 2022 – 8:57am



38: RIMG0252

Description: Meat and feather separator. Wastewater collects in the pit below the separator.

Location: North Offal

Date/Time: April 13, 2022 – 8:59am



39: RIMG0253

Description: Meat and Feather Separator. Note employee shoveling meat that jammed the conveyor and caused it to fall on the floor above the north pit.

Location: North Offal

Date/Time: April 13, 2022



40: RIMG0254

Description: Feather and Meat conveyors

Location: North Offal

Date/Time: April 13, 2022 – 9:00am

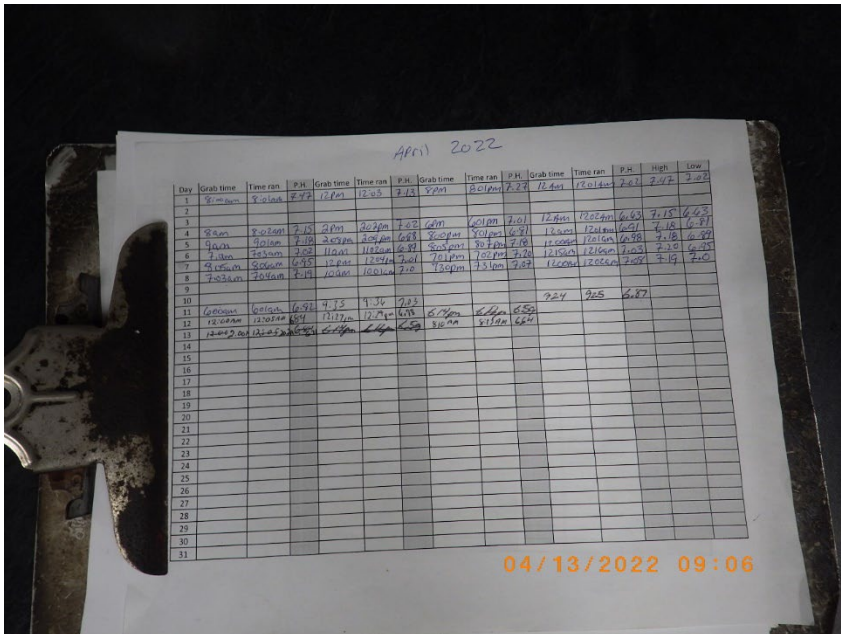


41: RIMG0255

Description: Wastewater entering the drain in the north pit

Location: North Offal

Date/Time: April 13, 2022 – 9:00am

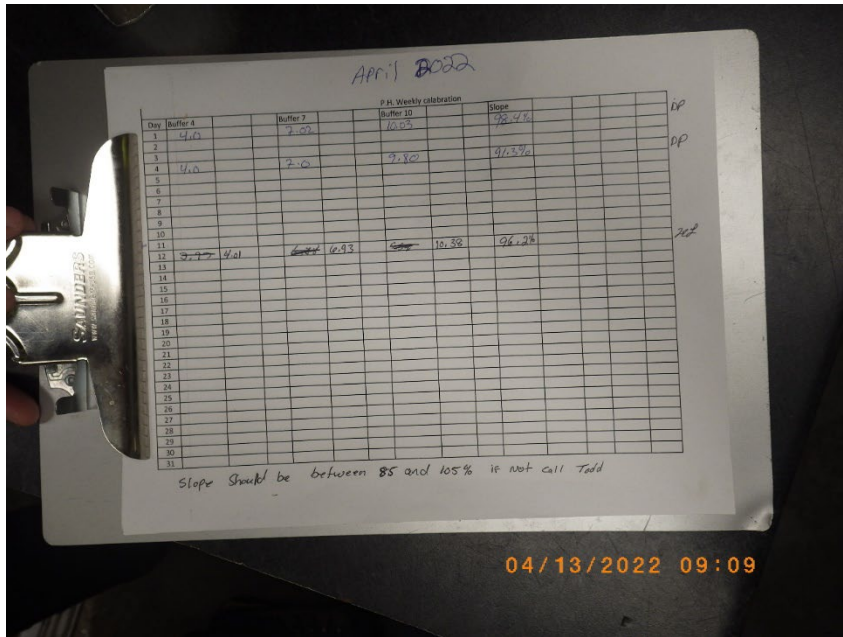


42: RIMG0256

Description: pH log

Location: Housed in a small room on the north side of the shipping dock

Date/Time: April 13, 2022 – 9:06am



43: RIMG0257

Description: pH calibration log

Location: Housed in a small room on the north side of the shipping dock

Date/Time: April 13, 2022 – 9:09am



44: RIMG0258

Description: Trough with drain between buidings. The drain is closed – gets cleaned and pumped periodically.

Location: Just south of the shipping dock

Date/Time: April 13, 2022 – 9:13am



45: RIMG0259

Description: Sluice gate is opened for rain (kept closed in dry weather).

Location: Stormwater Ditch on the south property line – leading to stormwater outfall 2

Date/Time: April 13, 2022 – 9:18am



46: RIMG0260

Description: Dead bird in the parking lot that flows to a stormwater drain. Perdue staff showed us the photo of this dead bird removed and area cleaned at the end of the inspection.

Location: Near South property line – next to the ditch

Date/Time: April 13, 2022 – 9:19am



47: RIMG0261

Description: Trough with drain near south offal. Area is diked and closed. Drain is periodically pumped to the south offal.

Location: Just outside South Offal – near south parking lot

Date/Time: April 13, 2022 – 9:21am



48: RIMG0262

Description: Area outside the trough from photo 47 (under the CO₂ tank) shows some straining. This is a parking lot that has stormwater drains.

Location: Just outside South Offal – near south parking lot

Date/Time: April 13, 2022 – 9:21am

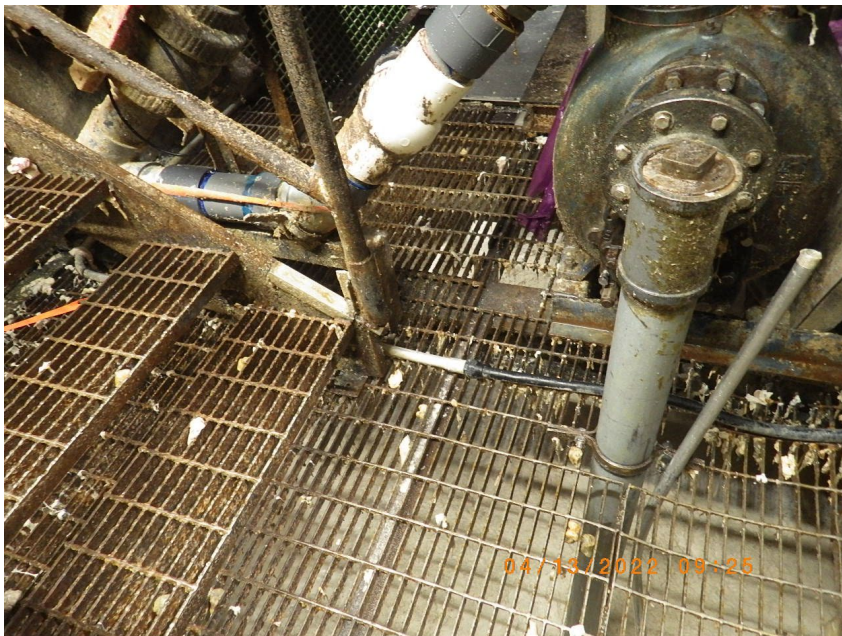


49: RIMG0263

Description: Pipe with wastewater flowing into the south pit

Location: South Offal

Date/Time: April 13, 2022 – 9:21am



50: RIMG0264

Description: South pit

Location: South Offal

Date/Time: April 13, 2022 – 9:25am



51: RIMG0265

Description: Wastewater flowing into the drain that leads to south pit

Location: South Offal

Date/Time: April 13, 2022 – 9:25am



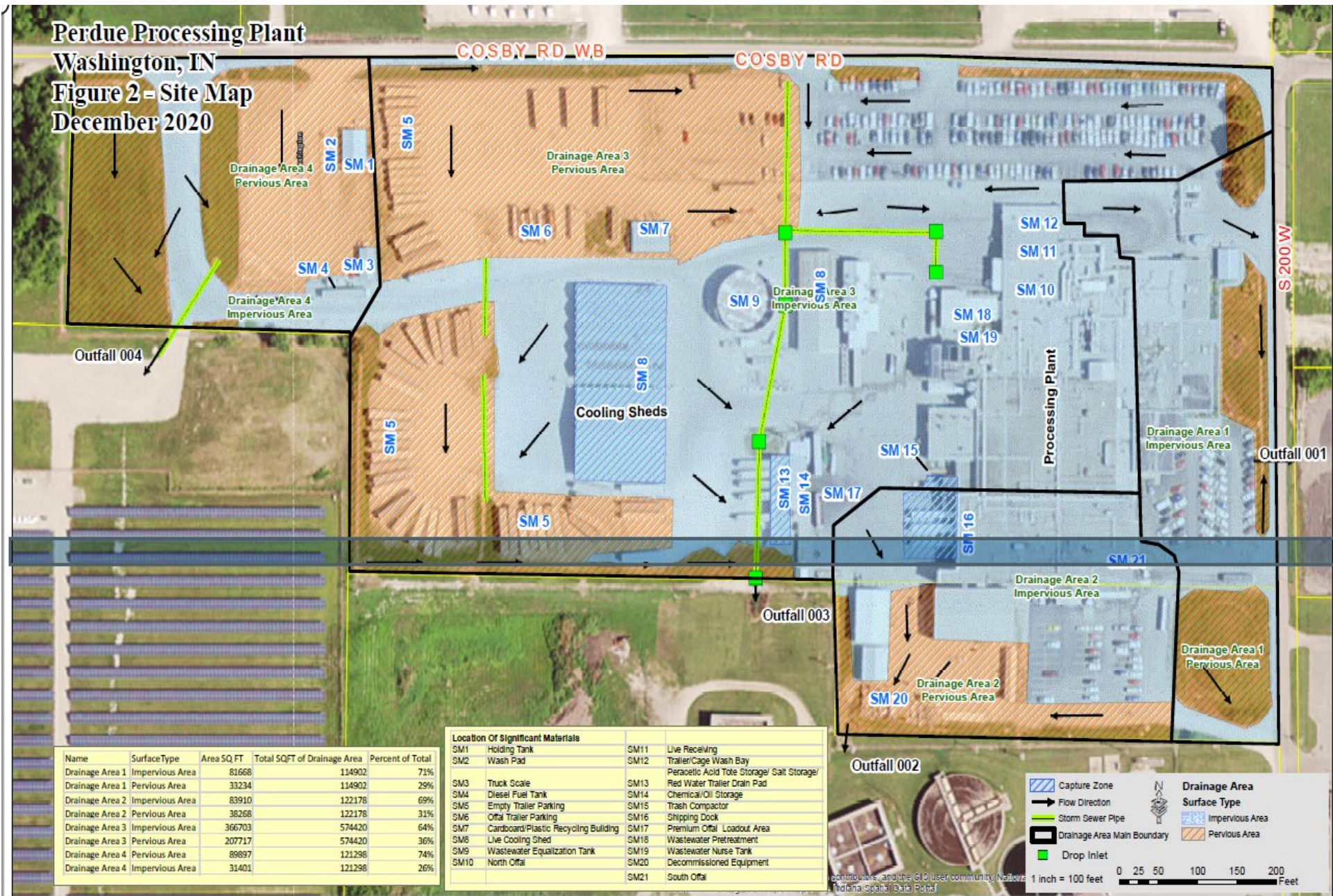
52: RIMG0266

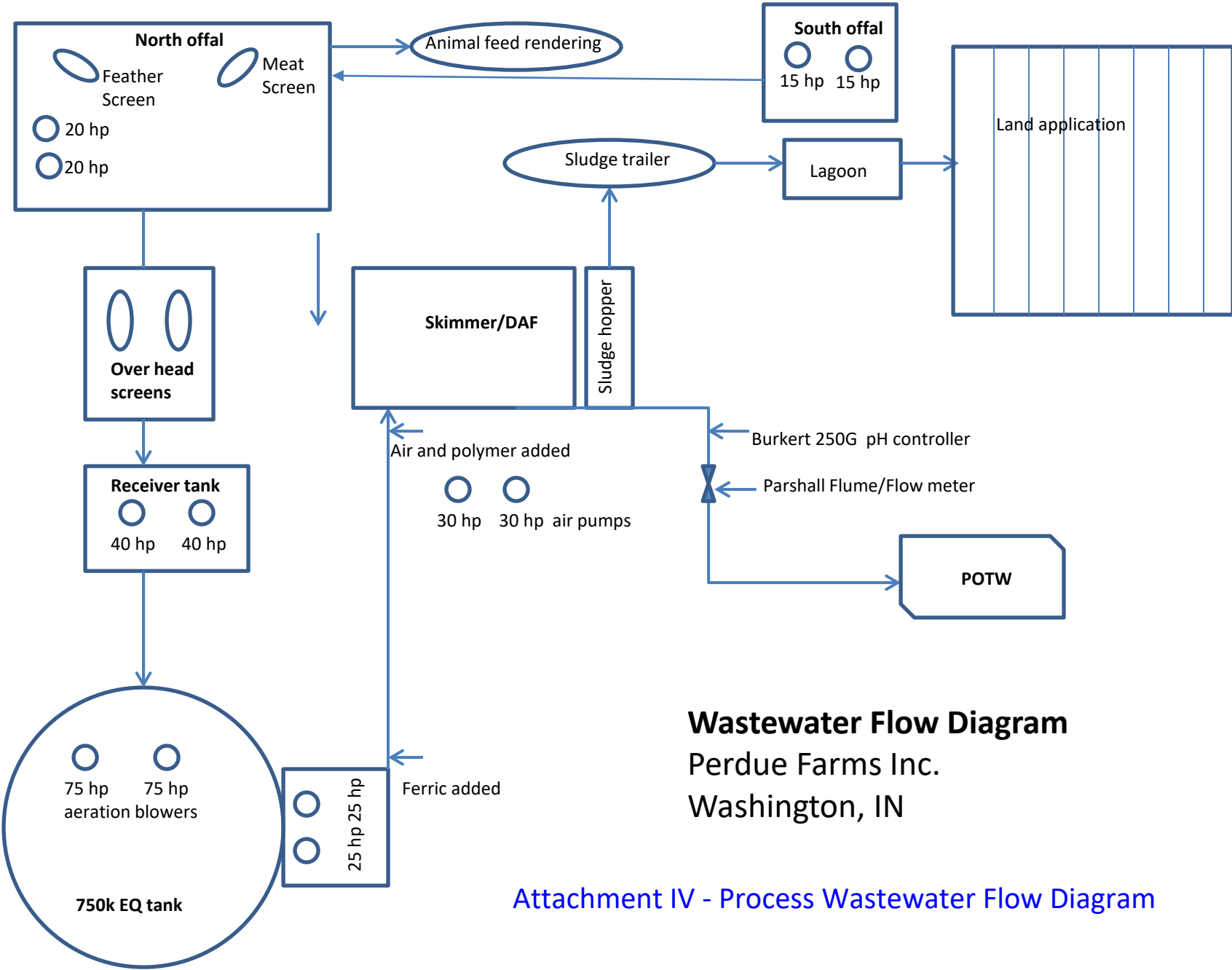
Description: Two cleanouts in the parkinglot without covers

Location: Just outside South Offal – near east parking lot

Date/Time: April 13, 2022 – 9:27am

Attachment II – Site Map





Wastewater Flow Diagram
 Perdue Farms Inc.
 Washington, IN

Attachment IV - Process Wastewater Flow Diagram

Attachment IV

Perdue Farms (Perdue Foods, LLC) in relation to the Hawkins Creek (south of Perdue facility)



Attachment V - DAF Bypass Removal – before and after

At the time of EPA Inspection -4/13/22



After the EPA Inspection – 4/19/2022



Attachment VI - Sanitary Cleanout Removal – before and after

At the time of EPA Inspection -4/13/22



After the EPA Inspection – 4/14/2022



VII. Bypass/Overflow Reports submitted to IDEM

SUBMITTED
Faith Lovett Wilson 7/8/20



BYPASS / OVERFLOW INCIDENT REPORT

State Form 48373 (R7 / 4-16)
Indiana Department of Environmental Management
Office of Water Quality

Follow-up to Bypass report previously sent on: _____

INSTRUCTIONS: Complete all parts of this form and email signed copies to wwreports@idem.in.gov. Submittal of this report will satisfy the Office of Water Quality (OWQ) telephone and written bypass/overflow reporting requirements of your NPDES permit. Please use and the second page of this form as necessary to identify separate locations caused by the same event. If you have any questions while filling out the report form, please contact Renee Repair at (317) 232-6770 or rrepair@idem.in.gov.

To report a spill or if the release is resulting in a fish kill or other severe environmental damage, immediately report the release to the Emergency Response Section spill response line at: (317) 233-7745 or toll free within Indiana at (888) 233-7745.

GENERAL INFORMATION					
(1) Facility Name (Organization) Perdue Farms Washington IN		(2) Mailing Address (reporting organization) 65s200W Washington IN 47501		(3) County Daviess	(4) NPDES Permit INP000176
RELEASE INFORMATION (Location 1)					
(5) Outfall Number 001A	(6) Date (mm/dd/yy) and Time Release Began '31/2020 11 <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM	(7) Date (mm/dd/yy) and Time Release Stopped 11:30 <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM	(8) Location of Release (streets address or Manhole, Lift Station, Force Main etc.) Equalization Tank	(9) Latitude (Deg Min Sec) 38.655204	(9) Longitude (Deg Min Sec) -87.205969
(10) Amount of Flow Released (Always provide a volume.) Check one: <input checked="" type="checkbox"/> Estimated <input type="checkbox"/> Actual 1500 Gallons			(11) WWTP Flow During Release .138 MGD	(12) WWTP Peak Design Flow Rate 2000 MGD	
(13) Overflow Type (Select one.) <input type="checkbox"/> Sanitary Sewer Overflow <input checked="" type="checkbox"/> Treatment Bypass (at wastewater plant) <input type="checkbox"/> Prohibited Combined Sewer Overflow <input type="checkbox"/> Dry Weather Combined Sewer Overflow <input type="checkbox"/> Combined Sewer System Release			(14) Describe any damage to aquatic life or receiving stream: Approximately 1500 overflowed the equalization tank due to a water line being left on after the plant shutdown. No one was in the wastewater department to find the tank filling nor to hear the alarm for high level in the tank.		
(15) Reason for Bypass / Overflow (Select one or more.) <input type="checkbox"/> Construction Related <input type="checkbox"/> Power Failure <input type="checkbox"/> Equipment Failure <input type="checkbox"/> Unknown <input checked="" type="checkbox"/> Exceeded Max Capacity <input type="checkbox"/> Precipitation Inches					
(16) System Component(s) (Select one or more.) <input type="checkbox"/> Manhole <input type="checkbox"/> House Lateral <input type="checkbox"/> Pipe Failure <input type="checkbox"/> Pump Station Failure <input type="checkbox"/> Treatment Bypassed <input checked="" type="checkbox"/> Other <input type="checkbox"/> Influent Structure <input type="checkbox"/> Air Relief Valve <input type="checkbox"/> Sewer Clean Out Describe Other: (in the box below)		(17) Additional Description of the Bypass / Overflow Event:		(18) Description of the Area Impacted (Check all that apply.) <input checked="" type="checkbox"/> Affected Private Property <input type="checkbox"/> Basement Backup <input type="checkbox"/> Occurred at Treatment Plant <input type="checkbox"/> Reached Public Land <input type="checkbox"/> Reached Receiving Water Name of Receiving Water Impacted:	
(19) Additional organizations notified by facility, if necessary (Select one or more.) <input checked="" type="checkbox"/> IDEM Emergency Response <input type="checkbox"/> Health Dept. <input type="checkbox"/> DNR Fish and Wildlife <input type="checkbox"/> Local Emergency Management <input type="checkbox"/> Other:					
(20) Actions Taken to Prevent, Minimize, or Mitigate Damage including Clean-up and Treatment of Affected Area (Select one or more of the following, then add a written description.) <input checked="" type="checkbox"/> Removed Blockage <input type="checkbox"/> Repaired Pipe <input type="checkbox"/> Repaired Pump Station <input checked="" type="checkbox"/> Other <input type="checkbox"/> Lime <input checked="" type="checkbox"/> Clean-Up Debris Flow was stopped and the process was turned on to bring the tank level down. Clean up of the water was done and all water was diverted to the wastewater treatment for processing.					
(21) Resolution: Actions Taken or Planned to Prevent Recurrence **The wastewater plant is now manned 24 hours a day, 7 days a week. **Additional berming was put in place **Guards will now patrol this area to monitor the tank levels ** Calling system was installed to notify staff of high levels.					

CERTIFICATION AND SIGNATURE					
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (The area below is for a handwritten signature or an electronic substitute then fax or scan to PDF for emailing.)					
SIGNATURE: <u>Faith Lovett Wilson</u>				DATE (month, day, year): <u>7/8/20</u>	
Individual Making Report (printed) <u>Faith Lovett Wilson</u>	Telephone Number <u>812 2548557</u>	Contact Email <u>Faith.Lovett.Wilson@perdue.com</u>	Date (month, day, year) / Time IDEM Notified <u>6:31/20 FT: 30PM</u>	<input checked="" type="checkbox"/> AM <input type="checkbox"/> PM	



BYPASS / OVERFLOW INCIDENT REPORT

State Form 46373 (R7 / 4-16)
Indiana Department of Environmental Management
Office of Water Quality

Follow-up to Bypass report
previously sent on: _____

INSTRUCTIONS: Complete all parts of this form and email signed copies to wwreports@idem.in.gov. Submittal of this report will satisfy the Office of Water Quality (OWQ) telephone and written bypass/overflow reporting requirements of your NPDES permit. Please use and the second page of this form as necessary to identify separate locations caused by the same event. If you have any questions while filling out the report form, please contact Renee Repar at (317) 232-6770 or rrepar@idem.in.gov.

To report a spill or if the release is resulting in a fish kill or other severe environmental damage, immediately report the release to the Emergency Response Section spill response line at: (317) 233-7745 or toll free within Indiana at (888) 233-7745.

GENERAL INFORMATION					
(1) Facility Name (Organization) Perdue Farms Washington IN		(2) Mailing Address (reporting organization) 65s200W Washington IN 47501		(3) County Daviess	(4) NPDES Permit INP000176
RELEASE INFORMATION (Location 1)					
(5) Outfall Number 001A	(6) Date (mm/dd/yy) and Time Release Began 12/2020 @ <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM	(7) Date (mm/dd/yy) and Time Release Stopped 12/2020 @ 1 <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM	(8) Location of Release (streets address or Manhole, Lift Station, Force Main etc.) Nurse tank	(9) Latitude (Deg Min Sec) 38.655204	(9) Longitude (Deg Min Sec) -87.205969
(10) Amount of Flow Released (Always provide a volume.) Check one: <input checked="" type="checkbox"/> Estimated <input type="checkbox"/> Actual 5-700 Gallons			(11) WWTP Flow During Release .138 MGD	(12) WWTP Peak Design Flow Rate 2000 MGD	
(13) Overflow Type (Select one.) <input type="checkbox"/> Sanitary Sewer Overflow <input checked="" type="checkbox"/> Treatment Bypass (at wastewater plant) <input type="checkbox"/> Prohibited Combined Sewer Overflow <input type="checkbox"/> Dry Weather Combined Sewer Overflow <input type="checkbox"/> Combined Sewer System Release			(14) Describe any damage to aquatic life or receiving stream: No unprocessed water made it offsite. The wastewater was captured in the stormwater pits.		
(15) Reason for Bypass / Overflow (Select one or more.) <input type="checkbox"/> Construction Related <input type="checkbox"/> Power Failure <input checked="" type="checkbox"/> Equipment Failure <input type="checkbox"/> Unknown <input type="checkbox"/> Exceeded Max Capacity <input type="checkbox"/> Precipitation inches					
(16) System Component(s) (Select one or more.) <input type="checkbox"/> Manhole <input type="checkbox"/> House Lateral <input type="checkbox"/> Pipe Failure <input checked="" type="checkbox"/> Pump Station Failure <input type="checkbox"/> Treatment Bypassed <input type="checkbox"/> Other <input type="checkbox"/> Influent Structure <input type="checkbox"/> Air Relief Valve <input type="checkbox"/> Sewer Clean Out Describe Other: (in the box below) level sensor failure		(17) Additional Description of the Bypass / Overflow Event: The level sensor failed to detect the level in the tank and did not turn on the pump when the tank started overflowing the staff turned on the pumps, squeegeed over water to a drain that would send the water back to the system. An emergency response vacuum truck was called and they cleaned up the area of any residues and pumped out the storm drains. <i>All was cleaned by around 10am</i>		(18) Description of the Area Impacted (Check all that apply.) <input checked="" type="checkbox"/> Affected Private Property <input type="checkbox"/> Basement Backup <input type="checkbox"/> Occurred at Treatment Plant <input type="checkbox"/> Reached Public Land <input type="checkbox"/> Reached Receiving Water Name of Receiving Water Impacted:	
(19) Additional organizations notified by facility, if necessary (Select one or more.) <input checked="" type="checkbox"/> IDEM Emergency Response <input type="checkbox"/> Health Dept. <input type="checkbox"/> DNR Fish and Wildlife <input type="checkbox"/> Local Emergency Management <input type="checkbox"/> Other:					
(20) Actions Taken to Prevent, Minimize, or Mitigate Damage including Clean-up and Treatment of Affected Area (Select one or more of the following, then add a written description.) <input checked="" type="checkbox"/> Removed Blockage <input type="checkbox"/> Repaired Pipe <input type="checkbox"/> Repaired Pump Station <input checked="" type="checkbox"/> Other <input type="checkbox"/> Lime <input checked="" type="checkbox"/> Clean-Up Debris Flow was stopped and the process was turned on to bring the tank level down. Clean up of the water was done and all water was diverted to the wastewater treatment for processing.					
(21) Resolution: Actions Taken or Planned to Prevent Recurrence * audible and visual alarm will be installed in the tank * Texting high level alarm system is being installed * new ball floats that area better suited for the tank are being installed.					

(22) CERTIFICATION AND SIGNATURE

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (The area below is for a handwritten signature or an electronic substitute then fax or scan to PDF for emailing.)

SIGNATURE:		DATE (month, day, year):	
Individual Making Report (printed) Faith Lovett Wilson	Telephone Number 8122549557	Contact Email faith.lovett-wilson@perdue.com	Date (month, day, year) / Time IDEM Notified 8/31/20 <input type="checkbox"/> AM <input type="checkbox"/> PM



BYPASS / OVERFLOW REPORT (Supplemental Locations)

State Form 48373 (R7 / 4-16)
Indiana Department of Environmental Management
Office of Water Quality

Follow-up to Bypass report
previously sent on: _____

(23) Complete all parts of each table for additional discharge locations caused by the same event as on the first page.
For any locations identified in the NPDES permit, include the Outfall number for that location from the permit.

RELEASE INFORMATION (Location 2)						
Outfall Number	Date (mm/dd/yy) and Time Release Began	Date (mm/dd/yy) and Time Release Stopped	Location of Release (streets address or Manhole, Lift Station, Force Main etc.)	Latitude (Deg Min Sec)	Longitude (Deg Min Sec)	
	<input type="checkbox"/> AM <input type="checkbox"/> PM	<input type="checkbox"/> AM <input type="checkbox"/> PM				
Amount of Flow Released <input type="checkbox"/> Estimated <input type="checkbox"/> Actual Gallons	Description of the Area Impacted (Check all that apply.) <input type="checkbox"/> Affected Private Property <input type="checkbox"/> Basement Backup <input type="checkbox"/> Reached Public Land <input type="checkbox"/> Reached Receiving Water			Name of Receiving Water Impacted		
RELEASE INFORMATION (Location 3)						
Outfall Number	Date (mm/dd/yy) and Time Release Began	Date (mm/dd/yy) and Time Release Stopped	Location of Release (streets address or Manhole, Lift Station, Force Main etc.)	Latitude (Deg Min Sec)	Longitude (Deg Min Sec)	
	<input type="checkbox"/> AM <input type="checkbox"/> PM	<input type="checkbox"/> AM <input type="checkbox"/> PM				
Amount of Flow Released <input type="checkbox"/> Estimated <input type="checkbox"/> Actual Gallons	Description of the Area Impacted (Check all that apply.) <input type="checkbox"/> Affected Private Property <input type="checkbox"/> Basement Backup <input type="checkbox"/> Reached Public Land <input type="checkbox"/> Reached Receiving Water			Name of Receiving Water Impacted		
RELEASE INFORMATION (Location 4)						
Outfall Number	Date (mm/dd/yy) and Time Release Began	Date (mm/dd/yy) and Time Release Stopped	Location of Release (streets address or Manhole, Lift Station, Force Main etc.)	Latitude (Deg Min Sec)	Longitude (Deg Min Sec)	
	<input type="checkbox"/> AM <input type="checkbox"/> PM	<input type="checkbox"/> AM <input type="checkbox"/> PM				
Amount of Flow Released <input type="checkbox"/> Estimated <input type="checkbox"/> Actual Gallons	Description of the Area Impacted (Check all that apply.) <input type="checkbox"/> Affected Private Property <input type="checkbox"/> Basement Backup <input type="checkbox"/> Reached Public Land <input type="checkbox"/> Reached Receiving Water			Name of Receiving Water Impacted		
RELEASE INFORMATION (Location 5)						
Outfall Number	Date (mm/dd/yy) and Time Release Began	Date (mm/dd/yy) and Time Release Stopped	Location of Release (streets address or Manhole, Lift Station, Force Main etc.)	Latitude (Deg Min Sec)	Longitude (Deg Min Sec)	
	<input type="checkbox"/> AM <input type="checkbox"/> PM	<input type="checkbox"/> AM <input type="checkbox"/> PM				
Amount of Flow Released <input type="checkbox"/> Estimated <input type="checkbox"/> Actual Gallons	Description of the Area Impacted (Check all that apply.) <input type="checkbox"/> Affected Private Property <input type="checkbox"/> Basement Backup <input type="checkbox"/> Reached Public Land <input type="checkbox"/> Reached Receiving Water			Name of Receiving Water Impacted		
RELEASE INFORMATION (Location 6)						
Outfall Number	Date (mm/dd/yy) and Time Release Began	Date (mm/dd/yy) and Time Release Stopped	Location of Release (streets address or Manhole, Lift Station, Force Main etc.)	Latitude (Deg Min Sec)	Longitude (Deg Min Sec)	
	<input type="checkbox"/> AM <input type="checkbox"/> PM	<input type="checkbox"/> AM <input type="checkbox"/> PM				
Amount of Flow Released <input type="checkbox"/> Estimated <input type="checkbox"/> Actual Gallons	Description of the Area Impacted (Check all that apply.) <input type="checkbox"/> Affected Private Property <input type="checkbox"/> Basement Backup <input type="checkbox"/> Reached Public Land <input type="checkbox"/> Reached Receiving Water			Name of Receiving Water Impacted		
RELEASE INFORMATION (Location 7)						
Outfall Number	Date (mm/dd/yy) and Time Release Began	Date (mm/dd/yy) and Time Release Stopped	Location of Release (streets address or Manhole, Lift Station, Force Main etc.)	Latitude (Deg Min Sec)	Longitude (Deg Min Sec)	
	<input type="checkbox"/> AM <input type="checkbox"/> PM	<input type="checkbox"/> AM <input type="checkbox"/> PM				
Amount of Flow Released <input type="checkbox"/> Estimated <input type="checkbox"/> Actual Gallons	Description of the Area Impacted (Check all that apply.) <input type="checkbox"/> Affected Private Property <input type="checkbox"/> Basement Backup <input type="checkbox"/> Reached Public Land <input type="checkbox"/> Reached Receiving Water			Name of Receiving Water Impacted		

(ATTACH ADDITIONAL SHEETS IF NECESSARY.)

CERTIFICATION AND SIGNATURE

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

SIGNATURE: _____

David W. B. [Signature]

DATE (month, day, year): 9/2/2020



BYPASS / OVERFLOW INCIDENT REPORT

State Form 48373 (R7/4-16)
Indiana Department of Environmental Management
Office of Water Quality

Follow-up to Bypass report
previously sent on: _____

INSTRUCTIONS: Complete all parts of this form and email signed copies to wwreports@idem.in.gov. Submittal of this report will satisfy the Office of Water Quality (OWQ) telephone and written bypass/overflow reporting requirements of your NPDES permit. Please use and the second page of this form as necessary to identify separate locations caused by the same event. If you have any questions while filling out the report form, please contact Renee Repar at (317) 232-6770 or rrepar@idem.in.gov.

To report a spill or if the release is resulting in a fish kill or other severe environmental damage, immediately report the release to the Emergency Response Section spill response line at: (317) 233-7745 or toll free within Indiana at (888) 233-7745.

GENERAL INFORMATION					
(1) Facility Name (Organization) Perdue Foods		(2) Mailing Address (reporting organization) 65s 200W		(3) County Davies	(4) NPDES Permit INP000176
RELEASE INFORMATION (Location 1)					
(5) Outfall Number 001a	(6) Date (mm/dd/yy) and Time Release Began 6/2020 @ 0:00 <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM	(7) Date (mm/dd/yy) and Time Release Stopped 6/2020 @ 04:00 <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM	(8) Location of Release (streets address or Manhole, Lift Station, Force Main etc.) EQ Tank pump house	(9) Latitude (Deg Min Sec) 38.655204	(9) Longitude (Deg Min Sec) -87.205969
(10) Amount of Flow Released (Always provide a volume.) Check one: <input checked="" type="checkbox"/> Estimated <input type="checkbox"/> Actual 5-100 Gallons			(11) WWTP Flow During Release 1.0 MGD	(12) WWTP Peak Design Flow Rate 2 MGD	
(13) Overflow Type (Select one.) <input type="checkbox"/> Sanitary Sewer Overflow <input checked="" type="checkbox"/> Treatment Bypass (at wastewater plant) <input type="checkbox"/> Prohibited Combined Sewer Overflow <input type="checkbox"/> Dry Weather Combined Sewer Overflow <input type="checkbox"/> Combined Sewer System Release			(14) Describe any damage to aquatic life or receiving stream: No process water made it offsite. The spill was captured before it made it offsite in the stormwater collection area.		
(15) Reason for Bypass / Overflow (Select one or more.) <input type="checkbox"/> Construction Related <input type="checkbox"/> Power Failure <input checked="" type="checkbox"/> Equipment Failure <input type="checkbox"/> Unknown <input type="checkbox"/> Exceeded Max Capacity <input type="checkbox"/> Precipitation Inches					
(16) System Component(s) (Select one or more.) <input type="checkbox"/> Manhole <input type="checkbox"/> House Lateral <input type="checkbox"/> Pipe Failure <input type="checkbox"/> Pump Station Failure <input type="checkbox"/> Treatment Bypassed <input checked="" type="checkbox"/> Other <input type="checkbox"/> Influent Structure <input type="checkbox"/> Air Relief Valve <input type="checkbox"/> Sewer Clean Out Describe Other: (in the box below)		(17) Additional Description of the Bypass / Overflow Event: The ferric chloride feed line has a hole develop in the welds o the stainless piping. The operator found the leak and stopped it immediately. The ferric made its way to the storm water drain inside the plant area but did not make it through to the outfall. We sandbagged and placed booms to stop any flow potentially out of the storm drain and called in a Vacuum truck to clean up any residual.		(18) Description of the Area Impacted (Check all that apply.) <input checked="" type="checkbox"/> Affected Private Property <input type="checkbox"/> Basement Backup <input type="checkbox"/> Occurred at Treatment Plant <input type="checkbox"/> Reached Public Land <input type="checkbox"/> Reached Receiving Water Name of Receiving Water Impacted:	
(19) Additional organizations notified by facility, if necessary (Select one or more.) <input checked="" type="checkbox"/> IDEM Emergency Response <input type="checkbox"/> Health Dept. <input type="checkbox"/> DNR Fish and Wildlife <input type="checkbox"/> Local Emergency Management <input type="checkbox"/> Other:					
(20) Actions Taken to Prevent, Minimize, or Mitigate Damage including Clean-up and Treatment of Affected Area (Select one or more of the following, then add a written description.) <input type="checkbox"/> Removed Blockage <input checked="" type="checkbox"/> Repaired Pipe <input type="checkbox"/> Repaired Pump Station <input type="checkbox"/> Other <input type="checkbox"/> Lime <input type="checkbox"/> Clean-Up Debris The piping was repaired and the leak was stopped. The affected area was cleaned up and the gravel around the area was scraped up and pH was ran on it and it was found that the pH was neutral. IDEM was called on the cleanup and we were told that it was safe to use the gravel in the part and to since it was not a hazardous chemical					
(21) Resolution: Actions Taken or Planned to Prevent Recurrence We are looking into curbing to help eliminate potential spills to make it to the drains and minimize our impacts to the waters of the state or the local POTW. Also we are looking at Spill Kits and how to also be beneficial to spill response.					

(22)

CERTIFICATION AND SIGNATURE

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (The area below is for a handwritten signature or an electronic substitute then fax or scan to PDF for emailing.)

SIGNATURE:		DATE (month, day, year):			
Individual Making Report (printed) Faith Lovett Wilson	Telephone Number 812-257-8857	Contact Email faithlovett@perdue.com	Date (month, day, year) / Time IDEM Notified 8-31-2020 07:00	<input checked="" type="checkbox"/> AM <input type="checkbox"/> PM	

perdue.com



BYPASS / OVERFLOW REPORT (Supplemental Locations)

State Form 48373 (R7 / 4-16)
Indiana Department of Environmental Management
Office of Water Quality

Follow-up to Bypass report
previously sent on: _____

(23) Complete all parts of each table for additional discharge locations caused by the same event as on the first page.
For any locations identified in the NPDES permit, include the Outfall number for that location from the permit.

RELEASE INFORMATION (Location 2)					
Outfall Number	Date (mm/dd/yy) and Time Release Began	Date (mm/dd/yy) and Time Release Stopped	Location of Release (streets address or Manhole, Lift Station, Force Main etc.)	Latitude (Deg Min Sec)	Longitude (Deg Min Sec)
	<input type="checkbox"/> AM <input type="checkbox"/> PM	<input type="checkbox"/> AM <input type="checkbox"/> PM			
Amount of Flow Released <input type="checkbox"/> Estimated <input type="checkbox"/> Actual Gallons	Description of the Area Impacted (Check all that apply.) <input type="checkbox"/> Affected Private Property <input type="checkbox"/> Basement Backup <input type="checkbox"/> Reached Public Land <input type="checkbox"/> Reached Receiving Water			Name of Receiving Water Impacted	
RELEASE INFORMATION (Location 3)					
Outfall Number	Date (mm/dd/yy) and Time Release Began	Date (mm/dd/yy) and Time Release Stopped	Location of Release (streets address or Manhole, Lift Station, Force Main etc.)	Latitude (Deg Min Sec)	Longitude (Deg Min Sec)
	<input type="checkbox"/> AM <input type="checkbox"/> PM	<input type="checkbox"/> AM <input type="checkbox"/> PM			
Amount of Flow Released <input type="checkbox"/> Estimated <input type="checkbox"/> Actual Gallons	Description of the Area Impacted (Check all that apply.) <input type="checkbox"/> Affected Private Property <input type="checkbox"/> Basement Backup <input type="checkbox"/> Reached Public Land <input type="checkbox"/> Reached Receiving Water			Name of Receiving Water Impacted	
RELEASE INFORMATION (Location 4)					
Outfall Number	Date (mm/dd/yy) and Time Release Began	Date (mm/dd/yy) and Time Release Stopped	Location of Release (streets address or Manhole, Lift Station, Force Main etc.)	Latitude (Deg Min Sec)	Longitude (Deg Min Sec)
	<input type="checkbox"/> AM <input type="checkbox"/> PM	<input type="checkbox"/> AM <input type="checkbox"/> PM			
Amount of Flow Released <input type="checkbox"/> Estimated <input type="checkbox"/> Actual Gallons	Description of the Area Impacted (Check all that apply.) <input type="checkbox"/> Affected Private Property <input type="checkbox"/> Basement Backup <input type="checkbox"/> Reached Public Land <input type="checkbox"/> Reached Receiving Water			Name of Receiving Water Impacted	
RELEASE INFORMATION (Location 5)					
Outfall Number	Date (mm/dd/yy) and Time Release Began	Date (mm/dd/yy) and Time Release Stopped	Location of Release (streets address or Manhole, Lift Station, Force Main etc.)	Latitude (Deg Min Sec)	Longitude (Deg Min Sec)
	<input type="checkbox"/> AM <input type="checkbox"/> PM	<input type="checkbox"/> AM <input type="checkbox"/> PM			
Amount of Flow Released <input type="checkbox"/> Estimated <input type="checkbox"/> Actual Gallons	Description of the Area Impacted (Check all that apply.) <input type="checkbox"/> Affected Private Property <input type="checkbox"/> Basement Backup <input type="checkbox"/> Reached Public Land <input type="checkbox"/> Reached Receiving Water			Name of Receiving Water Impacted	
RELEASE INFORMATION (Location 6)					
Outfall Number	Date (mm/dd/yy) and Time Release Began	Date (mm/dd/yy) and Time Release Stopped	Location of Release (streets address or Manhole, Lift Station, Force Main etc.)	Latitude (Deg Min Sec)	Longitude (Deg Min Sec)
	<input type="checkbox"/> AM <input type="checkbox"/> PM	<input type="checkbox"/> AM <input type="checkbox"/> PM			
Amount of Flow Released <input type="checkbox"/> Estimated <input type="checkbox"/> Actual Gallons	Description of the Area Impacted (Check all that apply.) <input type="checkbox"/> Affected Private Property <input type="checkbox"/> Basement Backup <input type="checkbox"/> Reached Public Land <input type="checkbox"/> Reached Receiving Water			Name of Receiving Water Impacted	
RELEASE INFORMATION (Location 7)					
Outfall Number	Date (mm/dd/yy) and Time Release Began	Date (mm/dd/yy) and Time Release Stopped	Location of Release (streets address or Manhole, Lift Station, Force Main etc.)	Latitude (Deg Min Sec)	Longitude (Deg Min Sec)
	<input type="checkbox"/> AM <input type="checkbox"/> PM	<input type="checkbox"/> AM <input type="checkbox"/> PM			
Amount of Flow Released <input type="checkbox"/> Estimated <input type="checkbox"/> Actual Gallons	Description of the Area Impacted (Check all that apply.) <input type="checkbox"/> Affected Private Property <input type="checkbox"/> Basement Backup <input type="checkbox"/> Reached Public Land <input type="checkbox"/> Reached Receiving Water			Name of Receiving Water Impacted	

(ATTACH ADDITIONAL SHEETS IF NECESSARY.)

CERTIFICATION AND SIGNATURE

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

SIGNATURE: David J. [Signature]

DATE (month, day, year): 9/22/2020