

INSPECTION REPORT

Inspection Entry Date/Time	04/24/2025 08:55 AM (ET)	Announced: No	
Inspection Exit Date/Time	04/24/2025 11:28 AM (ET)	Access: Granted	
Weather			
Media	Water		
Statute(s)/Program(s)	Clean Water Act, NPDES, Industrial		
Type of Inspection	Compliance Evaluation Inspection (CEI)		
Permittee Name	Hirzel Canning Co (0387000242)		
Facility or Site Name	Hirzel Canning Co (0387000242)		
Facility/Site Physical Address	411 Lemoyne Rd		
City, State, Zip Code	Northwood, OH 43619		
County/Borough/Parish			
Facility GPS Coordinates	41.60965, -83.47401		
Mailing Address (If different)			
City, State, Zip Code			
FRS ID	110008595760		
Permit Number(s) (If Applicable)	OH0135666		
SIC and/or NAICS	2033		
Lead Inspector:			
Joseph Forth	JOSEPH FORTH	Digitally signed by JOSEPH FORTH Date: 2025.06.13 10:25:52 -05'00'	
	EPA REGION 5	Forth.Joseph@epa.gov	(312) 886-7275
Supervisor Review:			
Molly Smith	MOLLY SMITH	Digitally signed by MOLLY SMITH Date: 2025.06.13 11:17:38 -05'00'	
	EPA REGION 5	Smith.Molly@epa.gov	

SECTION I – INTRODUCTION

Site Entry and Inspection Objectives

EPA REGION 5 Lead Inspector, Joseph Forth, arrived at the Hirzel Canning Company (0387000242) (the “Site” or “Facility”), located at 411 Lemoyne Rd, Northwood, OH 43619, at 08:55 AM (ET) on 04/24/2025 for an unannounced inspection. EPA REGION 5 Lead Inspector presented credentials to Jessica Hirzel and informed the Facility that this was an EPA REGION 5 inspection to investigate as authorized by Clean Water Act (CWA) Section 308. This report is based on information supplied by Hirzel Canning Company (0387000242) representatives, direct observations made by the EPA REGION 5 inspector, records and reports maintained by the permittee and other information including: photographs taken by EPA REGION 5 inspector(s), physical evidence collected by the EPA REGION 5 inspector(s), measurements taken by EPA REGION 5 inspector(s), verbal or written statements made by information supplied by Hirzel Canning Company (0387000242) representatives during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA REGION 5 inspector(s) by Hirzel Canning Company (0387000242) representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or subsequent to the Inspection from a review of EPA, State, and/or public records may be included in this report.

Attendees

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA REGION 5	Joseph Forth	Lead Inspector	Yes	Yes
EPA REGION 5	Megan Bobb	Inspector	Yes	Yes
EPA REGION 5	Tatiana Frontera	Inspector	Yes	Yes
Hirzel	Jessica Hirzel	Plant Manager	Yes	Yes
Hirzel	Dan Jackson	Wastewater Superintendent	Yes	No

Facility/Site Description

EPA REGION 5 lead inspector confirmed the following facility information:

Hirzel Canning Company is a facility that processes and packages (cans) tomatoes and cabbage. During fresh produce season, the facility employs 80 employees. The Facility is open Monday through Saturday. The Facility is split into two seasonal plants. The cabbage plant operates from 7:00 AM to 7:00 PM and the tomato plant operates from 6:00 AM to 9:00 PM. From August to mid-October, the Facility processes tomatoes. From July to late October or early November, the Facility processes cabbage. The process begins with receiving the produce from the farms, once received the produce is washed with water. Hirzel grows 5% of the tomatoes used in the process, the rest of the tomatoes and cabbages are from contract farmers. Plant receives 30 truck loads of tomatoes and 5-6 truckloads of cabbage per day during processing season. Cabbage is passed through a tumbler system and sprayed with water. Tomatoes washed in the transfer trucks, the water then helps convey the tomatoes, via floating, into the plant. Water is also utilized for heating/steam and for sanitation of equipment.

Tomatoes are cooked in tanks and peeled. Minimal water is added to the product when canned, most liquid is derived from the produce. Off-season is when cabbage is canned and pasta sauce and other products are made.

All wastewater has solids separated and is then applied to the grass fields behind the facility The spray field systems were brought online in Summer 2024. The fields have a capture system for the wastewater that then conveys the wastewater to the lagoon system. November through July is when the lagoon system is open and

actively discharging. The average flow when discharging is 0.15 million gallons per day (mgd). The 3 lagoons are connected in series. In Spring 2024, the barrier wall between ponds 2 and 3 was removed and the lagoons combined. Solid wastes are separated before reaching the lagoons and sent to a composting facility in Pemberville, OH. The Facility discharges via Outfall 001 to Wolf Creek. When the weather is below 32 degrees Fahrenheit, the Facility has the capability to discharge directly to the City of Oregon wastewater treatment plant (WWTP). This discharge is not identified in the Ohio EPA NPDES Permit #OH0135666. The Facility is only allowed to discharge from Outfall 001 during the day, while an operator is present. Dan Jackson, Facility staff, performs visual inspections of Outfall 002.

The Facility installed a new stormwater separation system to prevent stormwater from entering the wastewater stream. The front half of the Facility has a retention pond for stormwater, the back half of the property is segregated and does not route to the retention pond. Additional stormwater capital projects are in the planning stage. At the time of the inspection, the Facility’s new stormwater separation system was not included in the SWPP given to EPA inspectors for review. The Facility also shared with EPA, during the inspection, that it was investigating installing a dissolved air floatation system (DAF) for further wastewater treatment. The sampling point for Outfall 001 is located at the valve which controls discharge to Wolf Creek. According to the Facility, grab samples are collected by Dan Jackson. The Facility was not, as of the date of inspection, recording the time at which pH samples were being analyzed to document the samples are being analyzed within 15 minutes from the time of collection. The Facility uses Jones and Henry Laboratories to analyze samples. Jones and Henry provide sample containers pre-filled with preservatives, and Dan Jackson collects the samples and transports the samples to Jones and Henry.

Facility/Site Information

Location(s)

Location/Area/Sub-area	Description
Application Fields, Treatment Lagoons, and Outfalls	The fields in which wastewater is applied, the lagoons in which land filtered wastewater receives further treatment, and Outfalls 001 and 002.
Tomato and Cabbage Plants	All processes and equipment associated with the tomato processing plant.

SECTION II – OBSERVATIONS

Location: Tomato and Cabbage Plants	
Observation #: JF1-OB-001	Date: 04/24/2025
Facility utilizes a caustic bath to separate skins from the tomatoes. According to the Facility, all floor drains in the production area connect to the wastewater system. The can cooler system recycles water throughout the day, then purges to wastewater at the end of the day. Storm drains in the produce unloading area are connected to the wastewater system.	

Photo(s)

1. [IMG_0466.JPG](#)
2. [IMG_0465.JPG](#)
3. [IMG_0467.JPG](#)
4. [IMG_0468.JPG](#)
5. [IMG_0469.JPG](#)
6. [IMG_0481.JPG](#)
7. [IMG_0479.JPG](#)
8. [IMG_0480.JPG](#)

Location: Application Fields, Treatment Lagoons, and Outfalls

Observation #: JF1-OB-002

Date: 04/24/2025

Screened wastewater is kept in aeration tanks until full, then discharges to be sprayed in the application fields.

At the time of inspection, Outfall 001 was discharging. Dan Jackson stated that the valve which controls the discharge had begun malfunctioning in early April 2025, allowing some discharge to continuously exit the outfall. At the time of the inspection the outfall was discharging. On May 15, 2025, after the inspection, the Facility provided a photo of the newly installed valve.

Photo(s)

1. [IMG_0470.JPG](#)
2. [IMG_0478.JPG](#)
3. [IMG_0477.JPG](#)
4. [IMG_0473.JPG](#)
5. [IMG_0472.JPG](#)
6. [IMG_0476.JPG](#)
7. [IMG_0474.JPG](#)
8. [IMG_0475.JPG](#)
9. [IMG_0471.JPG](#)

SECTION III – RECORDS REVIEW

Records may not be in sequential order.

Record: Other - Photo of Valve Replacement		AOC: No
Ref #: JF1-RR-006	Reviewed By: Joseph Forth	Reviewed Date: 05/15/2025
Facility provided a photo of the replaced valve for Outfall 001.		
Record: Other - Safety Data Sheet		AOC: No
Ref #: JF1-RR-005	Reviewed By: Joseph Forth	Reviewed Date: 05/15/2025

Facility provided the Safety Data Sheet for the caustic additive for the tomato process.		
Document(s)		
1. CAUSTIC - SDS.pdf		
Record: Other - Lab Chain of Custody Form		AOC: No
Ref #: JF1-RR-004	Reviewed By: Joseph Forth	Reviewed Date: 05/15/2025
Facility provided chain of custody record form.		
Document(s)		
1. nw-lab_007735.pdf		
Record: Process Description/Flow Diagram		AOC: No
Ref #: JF1-RR-003	Reviewed By: Joseph Forth	Reviewed Date: 05/15/2025
Facility provided product process flow and wastewater flow diagrams.		
Document(s)		
1. NORTHWOOD Product Process Flow Diagram.pdf 2. NORTHWOOD Wastewater Flow Schematic.pdf		
Record: Other - SWPPP		AOC: No
Ref #: JF1-RR-002	Reviewed By: Joseph Forth	Reviewed Date: 05/15/2025
Facility provided Stormwater Pollution Prevention Plan (SWPPP) from October 2023.		
Document(s)		
1. SWPPP Northwood 10-12-2023.pdf		
Record: DMR Reports		AOC: No
Ref #: JF1-RR-001	Reviewed By: Joseph Forth	Reviewed Date: 05/15/2025
Discharge Monitoring Reports (DMRs) for February, March and April 2025.		
Document(s)		
1. report (1).pdf 2. report (2).pdf 3. report (3).pdf 4. report (4).pdf		

SECTION IV – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted.

SECTION V – AREA(S) OF CONCERN

Area(s) of Concern may not be in sequential order.

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

AOC Reference #: JF1-OC-FD	Opening Conference
AOC: The Facility was not, as of the date of inspection, recording the time at which pH samples were being analyzed to ensure the samples are being analyzed within 15 minutes.	

AOC Reference #: JF1-OC-FD	Opening Conference
AOC: When the weather is below 32 degrees Fahrenheit, the Facility has the capability to discharge directly to the City of Oregon WWTP. This discharge is not currently listed in the Ohio EPA NPDES Permit # OH0135666.	

AOC Reference #: JF1-OC-FD	Opening Conference
AOC: The Facility has not updated their SWPPP to include the new stormwater system mid-2024.	

AOC Reference #: JF1-OB-002	Location: Application Fields, Treatment Lagoons, and Outfalls
AOC: At the time of inspection, Outfall 001 was discharging. Dan Jackson stated that the valve which controls the discharge had begun malfunctioning in early April 2025, allowing a portion of the discharge to continuously exit Outfall 001, including constantly during the inspection.	

SECTION VI – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

The EPA REGION 5 Lead Inspector held a closing conference with Facility personnel at 11:28 AM (ET) on 04/24/2025 for the inspection. During the closing conference, EPA REGION 5 Lead Inspector discussed the observations and Area(s) of Concern identified during the inspection. Observations and Area(s) of Concern have not yet been evaluated for a formal compliance determination.

Follow-Up

U.S. EPA staff requested documentation of the repair of the Outfall 001 valve on 5/30/2025. On 6/2/2025, U.S. EPA staff requested documentation of whether Hirzel has measured the receiving water flow volumetric rate or received approval from Ohio EPA to exceed a discharge rate of 90 gallons per minute, per cubic feet per second of the receiving stream.

Communication Log

U.S. EPA Staff received documents from Jessica Hirzel on 5/20/2025.

SECTION VII – LIST OF APPENDICES

1. Photo Log
2. Document Log

APPENDIX 1: PHOTO LOG



Photo #1			IMG_0465.JPG
04/24/2025 10:20 AM	No CBI	No PII	Photographer: Joseph Forth
Tomato and Cabbage Plants			East
Photo of tomato washing area and peeler feed.			



Photo 2			IMG_0466.JPG
04/24/2025 10:21 AM	No CBI	No PII	Photographer: Joseph Forth
Tomato and Cabbage Plants			East
Photo of water spouts to fill tomato trucks			



Photo 3			IMG_0467.JPG
04/24/2025 10:28 AM	No CBI	No PII	Photographer: Joseph Forth
Tomato and Cabbage Plants			East
Photo of can cooling system.			



Photo 4			IMG_0468.JPG
04/24/2025 10:31 AM	No CBI	No PII	Photographer: Joseph Forth
Tomato and Cabbage Plants			East
Photo of rotary screen.			



Photo 5			IMG_0469.JPG
04/24/2025 10:34 AM	No CBI	No PII	Photographer: Joseph Forth
Tomato and Cabbage Plants			West
Photo of aeration tank and solids dumpster.			



Photo 6			IMG_0470.JPG
04/24/2025 10:36 AM	No CBI	No PII	Photographer: Joseph Forth
Application Fields, Treatment Lagoons, and Outfalls			North
Photo of spraying field.			



Photo 7			IMG_0471.JPG
04/24/2025 10:38 AM	No CBI	No PII	Photographer: Joseph Forth
Application Fields, Treatment Lagoons, and Outfalls			<i>Downward</i>
Photo of wastewater collection pit from spraying field that will be pumped to the lagoons.			



Photo 8			IMG_0472.JPG
04/24/2025 10:40 AM	No CBI	No PII	Photographer: Joseph Forth
Application Fields, Treatment Lagoons, and Outfalls			<i>West</i>
Photo of pond 1 and inlet pipe.			



Photo 9			IMG_0473.JPG
04/24/2025 10:41 AM	No CBI	No PII	Photographer: Joseph Forth
Application Fields, Treatment Lagoons, and Outfalls			East
Photo of pond 2.			



Photo 10			IMG_0474.JPG
04/24/2025 10:43 AM	No CBI	No PII	Photographer: Joseph Forth
Application Fields, Treatment Lagoons, and Outfalls			West
Photo of pond 4 and discharge valve.			



Photo 11			IMG_0475.JPG
04/24/2025 10:46 AM	No CBI	No PII	Photographer: Joseph Forth
Application Fields, Treatment Lagoons, and Outfalls			<i>Northeast</i>
Photo of Outfall 001.			



Photo 12			IMG_0476.JPG
04/24/2025 10:46 AM	No CBI	No PII	Photographer: Joseph Forth
Application Fields, Treatment Lagoons, and Outfalls			<i>East</i>
Photo of Outfall 002.			



Photo 13			IMG_0477.JPG
04/24/2025 10:47 AM	No CBI	No PII	Photographer: Joseph Forth
Application Fields, Treatment Lagoons, and Outfalls			East
Photo of outfall signage for Outfalls 001 and 002.			



Photo 14			IMG_0478.JPG
04/24/2025 10:52 AM	No CBI	No PII	Photographer: Joseph Forth
Application Fields, Treatment Lagoons, and Outfalls			Downward
Photo of stormwater outfall valve.			



Photo 15			IMG_0479.JPG
04/24/2025 10:57 AM	No CBI	No PII	Photographer: Joseph Forth
Tomato and Cabbage Plants			<i>Cabbage Plant</i>
Photo of cabbage tumbler.			



Photo 16			IMG_0480.JPG
04/24/2025 10:58 AM	No CBI	No PII	Photographer: Joseph Forth
Tomato and Cabbage Plants			<i>Downward, Cabbage Plant</i>
Photo of cabbage wastewater holding tank.			



Photo 17			IMG_0481.JPG
04/24/2025 11:01 AM	No CBI	No PII	Photographer: Joseph Forth
Tomato and Cabbage Plants			<i>Downward, tomato plant</i>
Photo of tomato pit waste water.			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
DMR Reports	report (1).pdf	No	No	Joseph Forth	5/15/2025
DMR Reports	report (2).pdf	No	No	Joseph Forth	5/15/2025
DMR Reports	report (3).pdf	No	No	Joseph Forth	5/15/2025
DMR Reports	report (4).pdf	No	No	Joseph Forth	5/15/2025
Other - SWPPP	SWPPP Northwood 10-12-2023.pdf	No	No	Joseph Forth	5/15/2025
Process Description/Flow Diagram	NORTHWOOD Product Process Flow Diagram.pdf	No	No	Joseph Forth	5/15/2025
Process Description/Flow Diagram	NORTHWOOD Wastewater Flow Schematic.pdf	No	No	Joseph Forth	5/15/2025
Other - Lab Chain of Custody Form	nw-lab_007735.pdf	No	No	Joseph Forth	5/15/2025
Other - Safety Data Sheet	CAUSTIC - SDS.pdf	No	No	Joseph Forth	5/15/2025