

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2, ECAD-WCB
290 Broadway, 21st Floor, New York, NY 10007

Program: Pretreatment		Inspection Type: Compliance Evaluation Inspection	
Permittee Name: Kraft Foods, Inc. – Avon Plant		NPDES/ICIS No.: NYR00B998 (MSGP)	
Inspection Entry Date: September 19, 2024 Inspection Entry Time: 10:15 AM		Inspection Exit Date: September 19, 2024 Inspection Exit Time: 4:00 PM	
Facility Information: Kraft Foods Inc. – Avon Plant 140 Spring Street Avon, NY, 14414		Lat, Long: 42.911111, -77.758333 NAICS / SIC Code: 2099 Food Preparations Not Elsewhere Classified MSGP: Sector U – Food and Kindred Spirits SIU of the Avon WWTP NY0024449	
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State Representative(s): Donald K. Cardinal, Env. Program Specialist, NYSDEC Reg. 8 Div. of Water, 6274 East Avon-Lima Road, NY 14414, (585) 225-5446, donald.cardinal@dec.ny.gov			
On-Site Facility Representative(s): Tyler Bonzo, Kraft-Avon, Operational Risk Mgr. (585) 226-4313, tyler.bonzo@kraftheinz.com Sarah Prinzi, EHS Support, sarah.prinzi@kraftheinz.com			
Responsible Official: Angela Iwanski, angela.iwanski@kraftheinz.com , Plant Manager Kraft-Avon			
Name and Signature of Inspector Murray Lantner, P.E. Env. Eng. MURRAY LANTNER		Agency/Office/Phone Number ECAD-WCB (212) 637-3976	Date Digitally signed by MURRAY LANTNER Date: 2025.01.11 13:51:33 -05'00'
Name and Signature of Management QA Reviewer LARRY GAUGLER Larry Gaugler, P.E. Team Leader, SCWCPT		Agency/Office/Phone Number ECAD-WCB (212) 637-3950	Date Digitally signed by LARRY GAUGLER Date: 2025.01.12 20:27:43

I. INTRODUCTION

On September 19, 2024, Representatives of the United States Environmental Protection Agency (“EPA”) Region 2 and the New York State Department of Environmental Conservation (“NYSDEC”) Region 8, conducted a Compliance Evaluation Inspection (“CEI” or “Inspection”) at Kraft Foods, Inc. – Avon Plant (“Facility”). The Kraft- Avon Plant is a food processor under SIC Code 2099 – Food Preparations-Not Elsewhere Classified.

Based on the Facility’s Stormwater Pollution Prevention Plan (“SWPPP”). The Kraft Avon facility manufactures frozen whipped toppings (Cool Whip) and Oscar Mayer Lunchable, products. The Facility is categorized within Standard Industrial Classification (“SIC”) Code of 2099 (Food Preparations Not Elsewhere Classified). On-site operations for the production of Cool Whip consist of the mixing of liquid and dry ingredients, packaging and freezing. On-site operations for the production of Lunchables, consist of slicing of meat and cheese products and vacuum packaging of the prepared items. Both products are stored on-site in a refrigerated warehouse prior to shipment off-site. Several ancillary operations, such as product testing, battery charging, and maintenance, are conducted on-site. Petroleum products are used as raw materials, in facility support functions including equipment lubrication and as a dielectric fluid (transformer oil) for electrical equipment. The facility encompasses an area of approximately 21.3 acres north of Spring Street and 45.7 acres south of Spring Street. The facility operates 24 hours per day, 5 days a week for Lunchables and 7 days a week for frozen whipped toppings. The facility has approximately 250 employees. The Facility does not maintain its own trucking fleet on-site but does have refrigerated trailers(“reefers”).

The Purpose of the inspection was to determine compliance with the industrial user requirements in 40 CFR 403 and Section 307 of the Clean Water Act for its process wastewater discharges to the Village of Avon Wastewater Treatment Plant (“WWTP”). The Village of Avon’s WWTP discharges to the Genessee River under State Pollutant Discharge Elimination System (“SPDES”) Permit No. (NY0024449). The Genessee River is a tributary of Lake Ontario, all Navigable Waters under the Clean Water Act.

The CEI also evaluated compliance with the Facility’s SPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity, GP-0-23-001 (“MSGP”) The Facility is a Food Processor (SIC Code 2099), Sector U of the MSGP (Food and Kindred Spirits) and maintains coverage under MSGP Permit Tracking No. NYR00B998. Stormwater discharges from the Facility discharge into a tributary of the Genessee River.

Upon entering the site, the EPA and NYSDEC inspectors presented their credentials to the Facility representatives listed above. The inspectors conducted the opening conference

explained the scope of the inspection. Following the opening conference, the inspectors, conducted an inspection of the Facility along with Facility representatives.

Note that there was a failure of the camera's memory card which deleted all of the photos taken by EPA during the inspection. Kraft-Avon provided its photos that it took during the inspection to EPA following the inspection, which are included in Attachment 1 of this inspection report.

This report is based on information supplied by Facility representatives, direct observations made by the EPA inspectors, and other information including: photographs taken by EPA inspectors, physical evidence collected by the EPA inspectors, measurements taken by EPA inspectors, verbal or written statements made by information supplied by the Facility representatives during or subsequent to the on-site inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA inspectors by the Facility representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or after the inspection from a review of EPA, State, and/or public records may be included in this report.

II. FINDINGS & OBSERVATIONS

Site Description:

Kraft has been issued a Village of Avon POTW ("Village" or "Avon"), Wastewater Discharge Permit ("Industrial User Permit" or "IU Permit") that authorizes the discharge of its process wastewater to the Village's sewer system. The IU Permit became effective on October 31, 2021, and expired on October 31, 2024, but was extended through December 31, 2024. Kraft is considered a Significant Industrial User of the Avon WWTP. A diagram of the IU Outfalls is shown in the drawing below, which was taken from the IU Permit. The Facility's IU Outfall 001 is the process wastewater effluent, which in the past was the clarifier effluent. However, since the start of operations of the new wastewater pretreatment plant ("WWPTP"), in May 2024, monitoring for Outfall 001 is now conducted at the new WWPTP. The IU Permit also lists an untreated process wastewater overflow to Outfall 004 which can enter the POTW sanitary sewer. A May 15, 2015 Notice of Violation from NYSDEC (Attachment 2) identified that the overflow can also flow into the Genessee river via a cross connection which was required to be removed.

The new WWPTP began operations on May 6, 2024. The new WWPTP includes screening, pH adjustment (sulfuric acid), equalization (200,000 gallon continuously mixed tank – with 2 mixers and 1 run at a time), caustic addition, dissolved air flotation ("DAF") to a buffer tank. WWPTP effluent composite samples are taken Monday to Thursday prior to discharging into the Avon Sanitary Sewer via Outfall 001. DAF sludge is held in the DAF sludge storage tank and said to be hauled to an off-site digester by North Star. There is also a clarifier tank that can be used to capture EQ tank overflows (from EQ tank overflow pipe) or can receive pumped flows if there is

an overload or operational problem at the new WWPTP. There is a plan to have the clarifier effluent rerouted back to the WWPTP and to eliminate the clarifier discharge to the sanitary sewer.

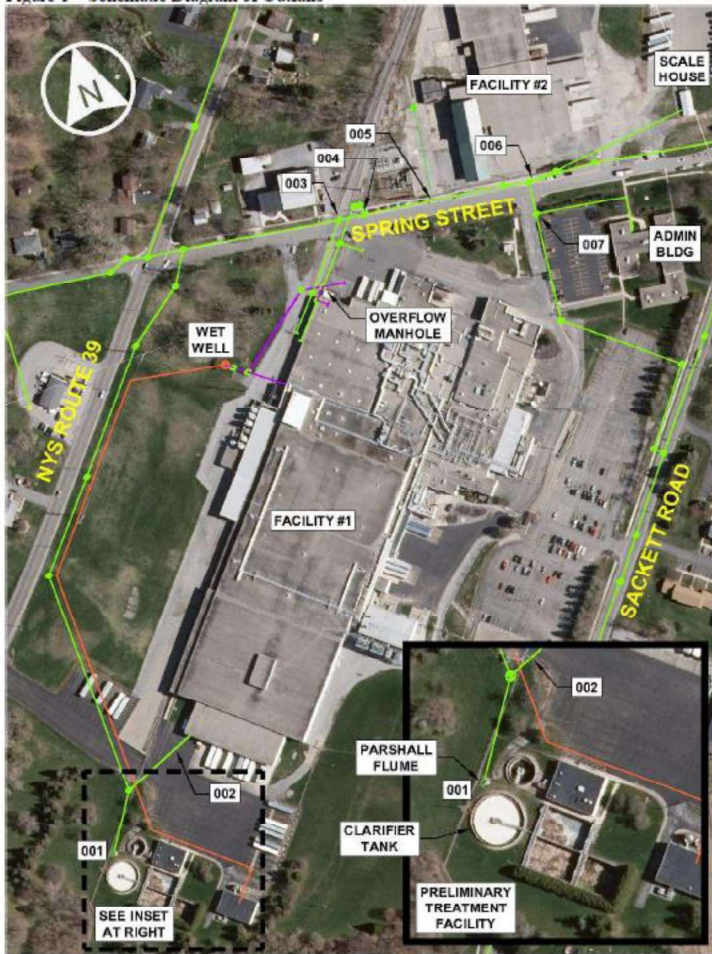
Flow for the new Outfall 001 is measured continuously with a mag-meter. The effluent flow at the time of the inspection was 68.9 gpm. At the time of the inspection, there was no influent flow from the plant going to the EQ tank. There is a continuous effluent pH meter which read 5.67 S.U. (The IU Permit limits for pH are 5 to 10). Wastewater flows to the sanitary sewer were said to be between 70,000 to 160,000 gpd. The Facility was still working on heating the new WWPTP building for winter operations.

The Facility operates a continuous turbidimeter on the DAF effluent which read 44.4 NTU, which was within the Facility's intended operating range of 15 to 100 NTU. The equalization tank level was at 180", the maximum level of the EQ Tank is 310". A high-level alarm for the EQ tank is sent when the EQ tank reaches a level of 285". The EQ tank high level alarm is on a dialer and will call out to the operator. Clean in Place ("CIP") of tanks is done on Fridays at approximately 10 PM.

PERMITTEE:
Kraft Heinz Co.

Village of Avon POTW
PERMIT No. SIU-1

Figure 1 – Schematic Diagram of Outfalls



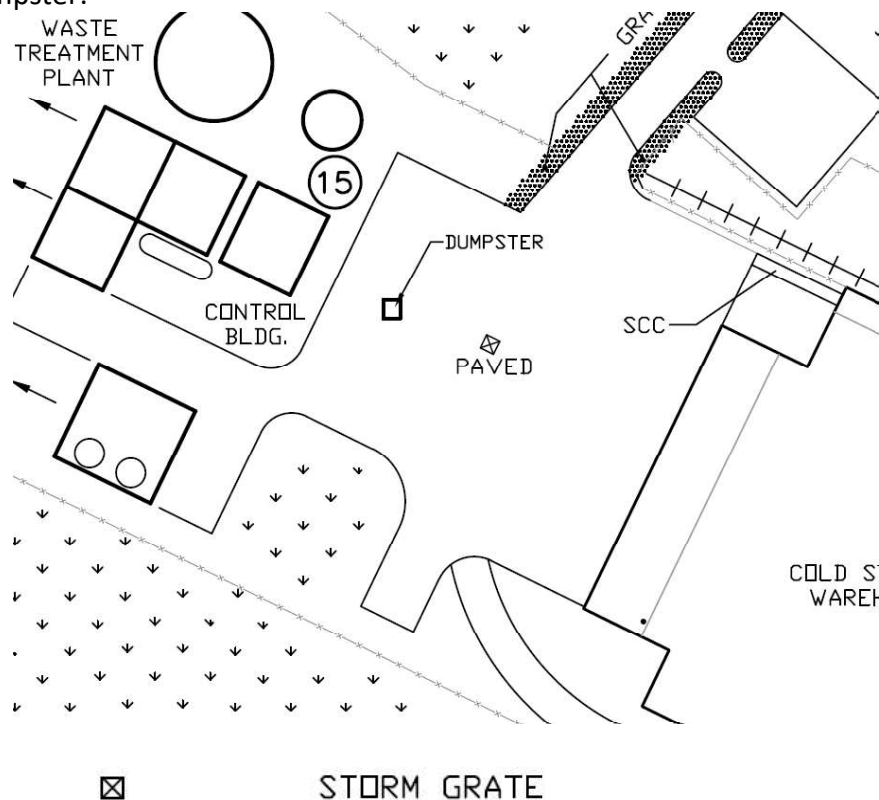
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A. Potential Non-Compliance - MSGP

1. Part II.A.2 of the Permit requires Good Housekeeping and that the permittee keep clean all exposed areas that are potential sources of pollutants. Good housekeeping measures must be performed in order to minimize pollutant discharges. At the time of the CEI, EPA observed the following areas that were not operated or maintained in accordance with the Multi Sector General Permit:
 - a. At the time of the inspection the roll-off dumpster located near the wastewater treatment area had a small leak onto the pavement which is near a stormwater catch basin.
 - b. As shown in Photos in Attachment 1 (Visit 6 and 7), there were exposed materials outside Plant 13 (also shown on the IU outfall map as Facility No. 2) which is across Spring Street (Northwest) from the main plant, but not identified on the Facility's Site Map.
2. Part IV.B. of the MSGP requires quarterly routine inspections of stormwater best management practices and that these inspections be documented in writing. During the inspection, records of quarterly routine inspections were not available. Following the inspection, by email dated December 11, 2024, Kraft representatives said that they would commence conducting Quarterly Routine BMP inspections.
3. Part IV.E of the MSGP requires Quarterly Visual Inspections of its stormwater outfalls and the maintaining of inspection records. EPA requested Quarterly Visual Inspections for the period 3rd Quarter 2023 to the 3rd Quarter 2024. Kraft did not have 2023 records prior to the 4th Quarter of 2023 due to limited retention due to turnover, but did have quarterly visual inspection records for 4th quarter 2023 and onward. Kraft said that they believed that the 2023 the quarterly visual monitoring was completed and Kraft will continue to look for these records.
4. Part II.8 of the MSGP requires Annual Employee Training. Part III.A.7.e.(2) of the MSGP requires that a signed and dated employee training log must be maintained with the SWPPP. Part VI.C.2 of the MSGP requires that records be maintained for a period of 5 years. EPA requested annual employee training records for 2023 and 2024. Kraft provided the Annual Stormwater Employee Training records for 2024, but said that the 2023 employee training records were not available due to turnover in the compliance/safety department.
5. Part III.A.6 of the Multi Sector General Permit specifies site map requirements including location of potential pollutant sources, location of outfalls, and processing and storage areas. At the time of the inspection, EPA noticed the following deficiencies:
 - a. Plant 13 (also shown on the IU outfall map as Facility No. 2) which is across Spring Street (Northwest) from the main plant was not identified on the Site Map. Plant 13

still has some outdoor storage and is drained by storm drains on Site and therefore represents a potential pollutant source that must be identified on the Site Map. Following the inspection (by email on 12/11/24), Kraft provided a revised Site Map dated December 3, 2024, which did show the stormwater drainage from this area.

- b. There is a catch basin in the vicinity of the roll of dumpsters that was not on the site map during the inspection. The revised site map dated 12/3/24 did show the dumpster and the nearby stormwater catch basin. The Site Map however, did not identify the stormwater sewer (or outfall) that drains that catch basin near the dumpster.



B. Potential Non-Compliance Industrial User

1. Pass Thru and Interference

- a. 40 CFR 403.3 (k) specifies, "[t]he term *Interference* means a Discharge which, alone or in conjunction with a discharge or discharges from other sources, both:

(1) Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal; and

(2) Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including State regulations contained in any State sludge management plan prepared pursuant to subtitle D of the SWDA), the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act."

- b. 40 CFR 403.3(p) specifies that, "the term Pass Through means a Discharge which exits the POTW into waters of the United States in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation)."
- c. 40 CFR Part 403.5 (a) specifies that a user may not introduce into a POTW any pollutant(s) which cause Pass Through or Interference.
- d. 40 CFR 403.5(b)(3) prohibits the discharge of solid or viscous pollutants in amounts which will cause obstruction to the flow in the POTW resulting in Interference;
- e. The table below shows Avon WWTP Permit Exceedances for the period March 2023 September 2024 with a clear reduction in BOD beginning in early 2024. 40 CFR 403.5(b)(4) prohibits the discharge of any pollutant, including oxygen demanding pollutants (BOD, etc.) released in a Discharge at a flow rate and/or pollutant concentration which will cause Interference with the POTW. 40 CFR 403.5 prohibits causing or contributing to pass through and interference at the POTW.

Table 1 - Avon WWTP Permit (NY0024449) Exceedances at Outfall 001 for the Period March 2023 to September 2024

Monitoring Period Date	Parameter Description	Statistical Base Type	DMR Value Unit	Limit Value	DMR Value
March-23	BOD, 5-day, 20 deg. C	7 DA AVG	kg/d	172.5	410.7
March-23	BOD, 5-day, 20 deg. C	MO AVG	mg/L	30	46.9
March-23	BOD, 5-day, 20 deg. C	7 DA AVG	mg/L	45	72.6
March-23	BOD, 5-day, 20 deg. C	MO AVG	kg/d	113.5	237.9
March-23	Flow, in conduit or thru treatment plant	MO AVG	MGD	1	1.439
April-23	Flow, in conduit or thru treatment plant	MO AVG	MGD	1	1.297

Monitoring Period Date	Parameter Description	Statistical Base Type	DMR Value Unit	Limit Value	DMR Value
May-23	BOD, 5-day, 20 deg. C	7 DA AVG	kg/d	172.5	587.0
May-23	BOD, 5-day, 20 deg. C	MO AVG	kg/d	113.5	215.7
May-23	BOD, 5-day, 20 deg. C	7 DA AVG	mg/L	45	204
May-23	BOD, 5-day, 20 deg. C	MO AVG	mg/L	30	71.2
May-23	BOD, 5-day, percent removal	MO AV MN	%	85	81
June-23	BOD, 5-day, 20 deg. C	7 DA AVG	mg/L	45	63.9
June-23	BOD, 5-day, 20 deg. C	MO AVG	mg/L	30	39.2
July-23	BOD, 5-day, 20 deg. C	MO AVG	kg/d	113.5	145.7
July-23	BOD, 5-day, 20 deg. C	7 DA AVG	mg/L	45	223
July-23	BOD, 5-day, 20 deg. C	MO AVG	mg/L	30	60.9
July-23	BOD, 5-day, 20 deg. C	7 DA AVG	kg/d	172.5	528.5
September-23	Phosphorus, total (as P)	MO AVG	mg/L	1	1.09
January-24	BOD, 5-day, 20 deg. C	MO AVG	mg/L	30	74.2
January-24	BOD, 5-day, 20 deg. C	7 DA AVG	mg/L	45	319
January-24	BOD, 5-day, 20 deg. C	MO AVG	kg/d	113.5	286.0
January-24	BOD, 5-day, 20 deg. C	7 DA AVG	kg/d	172.5	1242.9
January-24	BOD, 5-day, percent removal	MO AV MN	%	85	78
April-24	Flow, in conduit or thru treatment plant	MO AVG	MGD	1	1.489

As shown in Table 2 below, based on information provided to EPA by Kraft following the inspection, there were the following exceedances of the Kraft IU Permit in the same months (May 2023, July 2023, January 2024) that the Avon WWTP had permit exceedances.

Table 2 Kraft Avon IU Permit Exceedances April 2023, May 2023, July 2023, and January 2024				
Date	BOD (Lbs/Day) (Limit 850 lbs/day)	TSS (LBS/Day) Limit 600	FOG (mg/l) Limit 100	Phosphorus (Limit 8 mg/l)
04/04/23	4,991			
04/11/23	896			
04/18/23	2,269			
04/25/23	1,471	919		
05/02/23	2,126	1,017		

05/09/23	2,517	826		
05/16/23	4,604	2,031	3,400	
05/23/23	3,133	928	1,800	
05/30/23	946		1,000	
07/06/23	2,777			
07/11/23	3,675	4,107	14,000	8
07/18/23	2,054		1,300	
07/25/23	1,298		630	
01/08/24	1,253			
01/15/24	2,421		110	
01/30/24	2,477		710	

- f. Part 2.G of the IU Permit requires collection of additional samples when analytical results indicate violation of the Sewer Use Law Standards and/or the IU Permit. Based upon information from NYSDEC, additional sample results were not provided to Avon following IU Permit exceedances.

Note that Kraft recently installed its dissolved air flotation unit, pH neutralization, equalization in May 2024 and was said to have improved the quality of the effluent discharged to the Avon Sanitary Sewer.

2. 40 CFR 403.5(b)(2) prohibits the discharge of pollutants which will cause corrosive structural damage to the POTW, but in no case Discharges with pH lower than 5.0, unless the works is specifically designed to accommodate such Discharges. Kraft's IU Permit specifies that the Kraft discharge shall be between pH 5.0 and 10.0 S.U.

The IU Permit specifies that the pH of the discharges to the sanitary sewer be between 5 and 10. Based upon review of the data provided by Avon for the months of March 2023, May 2023, July 2023, January 2024, the following instances of discharges to the sanitary sewer of pH <5 were identified.

Table 3 – pH<5 from Kraft Avon into the Avon Sanitary Sewer March, May and July 2023, and January 2024.

Date	pH Average or Min below 5 SU Limit (whichever was reported and is less)	Date	pH Average or Min below 5 SU Limit (whichever was reported and is less)	Date	pH Average or Min below 5 SU Limit (whichever was reported and is less)
5/13/23	4.99	7/2/23	4.7	7/30/23	4.9
5/14/23	4.45	7/4/23	5.2	7/31/23	4.75
5/15/23	4.13	7/5/23	4.88		

5/16/23	3.9	7/6/23	4.68	1/2/24	4.96
5/17/23	3.87	7/7/23	4.54	1/4/24	4.34
5/18/23	3.89	7/8/23	4.48	1/5/24	4.34
5/29/23	4.81	7/9/23	4.43	1/6/24	4.87
5/30/23	4.72	7/10/23	4.42	1/7/24	4.82
5/31/23	4.37	7/11/23	4.32	1/8/24	4.83
		7/12/23	4.19	1/26/24	4.88
		7/16/23	4.57		
		7/17/23	4.5		
		7/18/23	4.37		
		7/19/23	4.46		
		7/20/23	4.81		
		7/24/23	4.69		
		7/25/23	4.56		
		7/26/23	4.53		
		7/27/23	4.6		

3. Kraft's IU Permit requires continuous monitoring for pH. As shown in the table below, based on a review Kraft data for the March, May, July 2023, and January 2024 indicated that there was no continuous monitoring of pH as follows:

Table 4 - Failure to Monitor pH Continuously per IU Permit in March, May, July 2023 and January 2024		
3/1/2023	3/11/2023	1/28/2024
3/2/2023	3/12/2023	1/29/2024
3/3/2023	3/13/2023	
3/4/2023	3/14/2023	
3/5/2023	3/15/2023	
3/6/2023	3/16/2023	
3/7/2023	3/17/2023	
3/8/2023	3/18/2023	
3/9/2023	3/19/2023	
3/10/2023	3/20/2023	
	3/21/2023	
	3/22/2023	

4. The IU Permit requires a high-level alarm for the untreated process wastewater lift station. High levels in the pump station could surcharge the process sewer and cause an overflow of untreated wastewater to the sanitary sewer via IU Outfall 004. The IU

Permit requires that high level alarms be installed to provide immediate notification to Kraft and then the Village of Avon prior to the occurrence of an overflow. The Facility representatives stated that the high water alarms for the lift station/outfall 004 report to the previously used Kraft wastewater treatment building. Now that there is a new WWPTP building, the Alarm notification for this outfall and lift station has been added as a part of the upgrade project which will generate immediate notification to Kraft and the Village of Avon. The Current alarm configuration does not currently meet the terms of the Permit, because the old WWTP building is not routinely staffed. Please provide the date that the high-level alarm for process wastewater overflows to Outfall 004 will be installed.

5. The IU Permit for Outfall 004 specifies that 0 gpd of process flow is authorized to discharge from Outfall 004. Additionally, the IU Permit identifies that there is an untreated process wastewater overflow point associated with high levels in the untreated process wastewater pump station that overflows to Outfall 004. Review of data sent to EPA for samples collected in October, 2024, indicated that process wastewater was discharged from Outfall 004. The sample results greatly exceed typical sanitary wastewater strength for parameters such as BOD, TSS, phosphorus, Oil and Grease and Ammonia. The outfall 004 flow exceeded Avon IU Permit Limits for Oil and Grease and Phosphorus at 004 as well as prohibitions contained in 40 CFR 403.5(b)(4). Kraft's 12/11/24 email said that they were not aware of process wastewater overflows via Outfall 004 in 2023 and 2024. Kraft needs to provide an explanation for this IU Permit exceedance at Outfall 004.

Table 5 - October, 2024 Sanitary Outfall 004.

Sample: Sanitary Sewer Outfall #4 / R2410602-001				
ANALYTE	IU Permiit Limit	40 CFR 403.5 prohibition	RESUL T	UNIT S
Oil and Grease, Total (HEM)	100	(3) Solid or viscous pollutants in amounts which will cause obstruction to the flow in the POTW resulting in Interference;	136	mg/L
Ammonia as Nitrogen, undistilled			211	mg/L
Nitrogen, Total Kjeldahl (TKN)			360	mg/L
Phosphorus, Total	8		73.5	mg/L

Solids, Total Suspended (TSS)		(3) Solid or viscous pollutants in amounts which will cause obstruction to the flow in the POTW resulting in Interference;	3890	mg/L
Biochemical Oxygen Demand (BOD)		(4) Any pollutant, including oxygen demanding pollutants (BOD, etc.) released in a Discharge at a flow rate and/or pollutant concentration which will cause Interference with the POTW.	1860 X	mg/L
Biochemical Oxygen Demand (BOD), Dissolved		""	624 X	mg/L

C. Areas of Concern - Stormwater

1. As shown in the photograph labelled Visit 8, in Attachment 1, there is a small water leak of fire suppression water onto the ground. Facility should work to fix the leak.
2. There is a day tank for fuel to run the fire pump. Verify that the tank is double walled or that the building provides adequate secondary containment per 40 CFR Part 112.
3. As shown in the photo entitled, visit 26, in Attachment 1, there are drain valves for secondary containment structures for ingredients such as corn syrup. The area that receives the drainage should be better stabilized to limit erosion when the drain valve is opened. Signs of erosion at the outlet pipe were seen during the inspection.

D. Areas of Concern - Industrial User

1. During the inspection it appeared that there was small hose return at the DAF that returned to a location near the DAF effluent. Please provide a drawing and description of the purpose this line.
2. At the time of the inspection, a contract operator was running the WWPTP. Indicate if there is a trained operator currently operating the WWPTP.

3. The clarifier, that now can be used during EQ tank overflows or operational issues at the new WWPTP was red. The red color in the clarifier was due to dye testing, and remained in the clarifier.
4. The IU Permit needs to be revised to reflect the new location for the Outfall 001 monitoring which is at the new WWPTP. The former Outfall 001 location shown in the IU Permit is the clarifier effluent that discharges through a weir with an ultrasonic flow sensor. There was no flow through the old Outfall 001 at the time of the inspection, but this outfall could still be utilized if there is flow through the clarifier.
5. Given the variability in flows and wastewater generated during a typical week EPA recommends that the IU Permit provide for more frequent monitoring of BOD, TSS, phosphorus and Oil and Grease at Outfall 001 that captures different types of flow (e.g. normal daily flows, versus end of week cleaning operations,)
6. The Facility should consider safer access hatches and also consider safety grates for its process wastewater lift station. The hatches are heavy, require 2 people to lift and are not designed to be opened and then stand at a 90 degree angle. The hatches need to be lowered all the way down 180 degrees. Additionally, there are no safety grates below the heavy hatches. Typically, Bilco type doors can be opened and will remain open in a 90 ° position, and not have to be lowered to a full 180 °. Given that the existing hatches are quite heavy, it is difficult to lower them slowly into the 180 ° resting position.
7. EPA recommends placing a thermometer in a container with water inside the composite sampling refrigerator for IU Outfall 001 to ensure that the refrigerator is maintained at ≤6 °C.
8. The following IU outfalls were inspected and IU outfall observations made. Areas of Concern are noted in the 3rd column.

IU Outfall	Description	AOC or PNC
Outfall 001 Clarifier	No Discharge	
Outfall 001 DAF – new WWPTP	DAF was discharging and was operating by removing floating solids.	
Outfall 002	Outfall 002 had small flow/drip, which was said to be difficult to sample.	AOC – small flows at 002 difficult to sample.
Overflow Manhole	The Overflow manhole is the location where process wastewater that is flowing to the process pump station	No overflow seen at the time of the inspection

	can overflow into the sanitary sewer Outfall 004 without first going to the Kraft Wastewater Treatment Plant. prior to the overflow	
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9. Kraft provided a revised Best Management Practices Plan required by Part 4.A.1 of the IU Permit which includes the new DAF system. Based upon Kraft's 12/11/24 email, the BMP Plan will need to change due to a recent request to incorporate pumping clarifier waste back into the DAF treatment system negating the need to discharge directly from the clarifier. Plans and funding are currently in progress. Please provide the schedule for these WWTP changes to allow for pumping the clarifier contents back to the DAF and modifying the BMP Plan.
10. Kraft does not have slug control plan and while a slug control plan is not specifically required in Kraft's IU permit, the IU Permit does specify in Part I.E, that Kraft shall provide a means to discharge flow and loading to the POTW on a controlled and regulated basis as not to allow slug loading or excessively high flow or loading conditions. Given the potential for the Kraft plant to cause pass through and interference at the Avon WWTP a requirement for a Slug Control Plan per 40 CFR 403.8(f)(2)(vi) should be included in the next iteration of the IU Permit. See <https://www3.epa.gov/npdes/pubs/owm021.pdf> for guidance. At this time, given the plant history Kraft must develop and implement a slug control plan that includes the use of the different wastewater treatment units (equalization tank, old clarifier tank, high level alarms etc.) to control slugs.
11. At the time of the inspection the Facility was planning on installing heating for the WWTP building before the onset of freezing temperatures. By email dated December 11, 2024, the Facility provided an update on the heating system and explained that the Facility has drum heating blankets that ensure the caustic chemical does not freeze. Kraft has an upgrade project for Wastewater treatment to add heating to the building that is anticipated to be completed in 2025. As of the week of 12/9/24 Kraft has additionally installed temporary heat which is keeping the inside of the treatment building at 60 degrees F.

E. Other Items - IU Permit

1. A December 11, 2024 email from Kraft identified that the First and Second quarter 2024 IU Monitoring records are not available for Outfalls 002,003, 004 and 007 because the Outfalls did not have a discharge. In July 2024, Kraft and the village partnered and since were able to generate flow in outfalls 002,003, 004 and 007, Because Outfall 005 and 006 are tied to historic buildings where no flow is being generated/ no process or work being performed, Kraft cannot collect samples from either. Kraft has discussed with the village plugging both.

F. Other Items - Stormwater MSGP

1. At the time of the inspection there was a clear water flow from a stormwater outfall 001 that could be closed off using a sluice gate.
2. The Annual Dry weather certification for 2023 was provided and found that there was no dry weather flow on 12/29/23.
3. Kraft does have a Spill Control and Countermeasure Plan in place to respond to Petroleum spills.
4. EPA requested the Annual Certification Report required by Part VI.A of the Permit for 2023 which was provided to EPA following the inspection in December 2024.

III. CLOSING

At the conclusion of the CEI, EPA representatives held a closing conference with the Facility representatives and discussed many of the above items.

IV. ATTACHMENTS

1. Photographs - Kraft photographs taken during the inspection and provided to EPA (EPA's camera had a memory card failure)
2. 2015 NYSDEC Notice of Violation related to unauthorized discharge from Kraft