

Pretreatment Compliance Inspection: Delphos, Ohio

Control Authority Name and Address

Delphos Wastewater Treatment Plant
24793 Pohlman Road
Delphos, Ohio 45833

Inspection Participants

Delphos Wastewater Treatment Plant

Todd Teman, Superintendent
Brandon Fetzer, Assistant Superintendent
Jeff Stockwell, Operator

United States Environmental Protection Agency

Jennifer Bush, Environmental Scientist
Gigi Giampietro, Environmental Engineer
Matthew Schulte, Environmental Scientist

Inspector Signature: JENNIFER BUSH

Digitally signed by
JENNIFER BUSH
Date: 2025.07.16
14:52:46 -05'00'

Approver Signature MOLLY SMITH

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MOLLY SMITH
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Contents

SECTION 1.0: INTRODUCTION 2

SECTION 2.0: SITE BACKGROUND AND PRELIMINARY REVIEW..... 3

SECTION 3.0: SUPPLEMENTAL DATA REVIEW/INTERVIEW..... 3

 A. Pretreatment Program Modification: 3

 B. IU Characterization: 4

 C. Application of Pretreatment Standards and Requirements: 4

 D. Compliance Monitoring: 4

 E. Enforcement:..... 4

 F. Data Management/Public Participation/Continuing Education: 5

 G. Resources:..... 5

SECTION 4.0: FILE REVIEWS..... 5

 4.1 IU Identification 5

 4.2 Facility Information 5

 4.3 IU Evaluation 6

 A. Issuance of IU Control Mechanism..... 6

 B. Control Authority Enforcement Activities..... 7

 C. IU Compliance Status 8

SECTION 5.0: INDUSTRIAL USER SITE VISITS..... 9

SECTION 6.0: SUMMARY OF FINDINGS 13

 A. Areas of Concern..... 13

ATTACHMENT I: PHOTO LOG

SECTION 1.0: INTRODUCTION

The United States Environmental Protection Agency (EPA) conducted a Federal Pretreatment Compliance Inspection (PCI) of the Delphos Wastewater Treatment Plant (Delphos or WWTP) from May 19, 2025 through May 21, 2025. The purpose of the inspection was to evaluate the procedures and implementation of Delphos’ pretreatment program. Delphos has a National Pollutant Discharge Elimination System (NPDES) Permit—Permit No. 2D00029*TD (Permit), with an effective date of February 1, 2024 and an expiration date of January 31, 2029. Part II.Z. of the Permit states that Delphos’ pretreatment program initially approved on December 23, 1986, and all subsequent

modifications approved before the effective date of the Permit shall be an enforceable term and condition of the Permit. EPA's inspection consisted of:

1. Review of requested submittals—prior to the on-site inspection;
2. Interviews and discussion with Delphos staff;
3. Industrial User (IU) file review; and
4. Two IU site visits.

Jennifer Bush, Gigi Giampietro, and Matthew Schulte of EPA arrived at the Delphos Wastewater Treatment Plant located at 24793 Pohlman Road in Delphos, Ohio at 12:55 p.m. EDT on May 19, 2025. EPA was met by Brandon Fetzner (Assistant Superintendent) of Delphos and the Opening Conference began at 12:59 p.m. EDT. An additional Opening Conference interview was held with EPA staff and Todd Teman (Superintendent) and Jeff Stockwell (Operator) on May 20, 2025.

SECTION 2.0: SITE BACKGROUND AND PRELIMINARY REVIEW

The City of Delphos has one wastewater treatment plant (Delphos WWTP). The Delphos WWTP has one outfall to the Jennings Creek at River Mile 5.1. The WWTP has a design maximum flow of 3.83 million gallons per day (MGD) and an actual flow of 1.12 MGD. However, Delphos has a combined sewer system in approximately 60% – 65% of the collection system. Delphos told EPA that during rain events the plant has experienced flows up to 5.0 MGD. The treatment process is as follows:

1. Primary: Activated sludge (aeration basin);
2. Secondary: Membrane bioreactors (MBR); and,
3. Tertiary: Ultraviolet (UV) disinfection.

Delphos told EPA that when the WWTP was upgraded in 2006, it was the largest membrane system in the United States at the time. The membrane in the MBR system onsite is a hollow fiber membrane, which is a hybrid technology owned by General Electric (GE) and was used as a pilot study at the Delphos WWTP. The City of Delphos worked with the Ohio Environmental Protection Agency (OEPA) to conduct the pilot project.

SECTION 3.0: SUPPLEMENTAL DATA REVIEW/INTERVIEW

Delphos provided EPA with the following information in the requested documentation pre-inspection, or during the Opening Conference(s).

A. Pretreatment Program Modification:

Delphos' pretreatment program was originally approved by OEPA in 1986. Since then, the City updated the Ordinance in 2009, but no additional changes have been made.

Delphos is in the process of re-evaluating its local limits. The WWTP staff conducted a Total Maximum Daily Load (TMDL) study on the receiving water for Phosphorus to be added to the local limit list, but it was found to be unnecessary. Delphos does not anticipate major changes or additional pollutants to be added to the local limits.

Delphos applies surcharges to IUs that exceed limits for Total Suspended Solids (TSS), Phosphorus, Ammonia, Oil and Grease (O&G), and Carbonaceous Biochemical Oxygen Demand (CBOD). The pollutants with surcharges are re-evaluated annually. Delphos utilizes a third party consultant to determine the surcharge formula.

B. IU Characterization:

Delphos' definition of significant industrial user (SIUs) is consistent with the language in 40 C.F.R. 403.3(t)(1).

Delphos updates its Industrial Waste Surveys (IWS) to identify new IUs or changes in wastewater discharges at existing IUs through the following methods:

1. Review of water billing records;
2. Review of plumbing/building permits; and,
3. Review of newspaper/phone books.

Delphos told EPA the IWS is updated on an as-needed basis. Delphos has one categorical industrial user (CIU), and two significant industrial users (SIUs). Historically, Delphos had additional IUs that discharged to the WWTP, but these have left the City due to large company buy-outs.

Delphos does not accept waste from any contributing jurisdictions, and does not accept hauled waste.

C. Application of Pretreatment Standards and Requirements:

Delphos has developed and implemented local limits for Bis (2 ethylhexyl) phthalate, Total Dissolved Solids (TDS), TSS, Cadmium, Total Chromium, Hexavalent Chromium, Copper, Lead, Mercury, Nickel, Zinc, O&G, and CBOD.

D. Compliance Monitoring:

Delphos completes annual inspections and compliance monitoring at the permitted CIU and SIUs. The CIU and one of the SIUs conduct self-monitoring on a monthly basis. Delphos does not require the second SIU to conduct self-monitoring.

E. Enforcement:

Delphos told EPA the definition of significant noncompliance (SNC) utilized by the WWTP is determined based on sample results that are outside of the loading rates, if the discharge impacts the plant operations, and if the permittee is consistently violating permit limits. In 2024, Delphos did not identify any IUs to be in SNC. Delphos told EPA that if an IU was determined to be in SNC, Delphos would publish the IU in the local newspaper.

Delphos told EPA that at the time of the inspection, the WWTP had recently been experiencing foaming issues. Delphos believes the foam is discharged from Lakeview Farms Inc, an SIU in the collection system. Delphos told EPA that the plant received a slug load, which appeared to be white and creamy (described as "dairy-like" by Delphos) in the influent. Delphos has a permanent sampler at the Lakeview Farms Inc facility, and requested their third party sampler (Alloway Environmental

Testing and Laboratory) to increase the sampling frequency. At the time of the inspection, the sampling had not indicated an exceedance of Lakeview Farms Inc's IU permit.

Delphos has not developed an Enforcement Response Plan (ERP). At the time of the PCI, Delphos had not taken enforcement against any of the permitted IUs.

F. Data Management/Public Participation/Continuing Education:

Cybersecurity questions were asked of Delphos at the time of the inspection.

Delphos coordinates with OEPA for continuing education and to stay up to date on NPDES and pretreatment program requirements.

G. Resources:

Delphos does not have a dedicated full time employee to implement the pretreatment program. The Delphos WWTP pretreatment program workload is completed by the Superintendent, Assistant Superintendent, and the Operator.

SECTION 4.0: FILE REVIEWS

4.1 IU Identification

IU Permit Number	IU Name	IU Type	Avg total flow (gpd)	Avg process flow (gpd)	Visited During Audit?	Reviewer	Categorical Pretreatment Standard
6	Bunge North America	Non-Categorical SIU	30000	Not provided	No	Gabrielle Giampietro	n/a
10	Lakeview Farms Inc	Non-Categorical SIU	89000	Not provided	Yes	Matthew Schulte	n/a
11	Unverferth Manufacturing Company, Inc.	Categorical IU	3000	Not provided	Yes	Jennifer Bush	40 CFR 433.17

4.2 Facility Information

Bunge North America (Bunge): 234 S. Jefferson Delphos, Ohio 45833

Bunge is a soybean processing plant that produces vegetable oil. The facility adjusts the pH and utilizes a chamber to capture O&G for pretreatment. Bunge North America has two outfalls and discharges continuously.

Lakeview Farms Inc (Lakeview Farms): 1700 Gressel Drive Delphos, Ohio 45833

Lakeview Farms is a food manufacturer that produces gelatin, pudding, dips, desserts, cheese, and

buffers. The facility utilizes a dissolved air flotation (DAF) unit for pretreatment. Lakeview Farms has one outfall and discharges continuously.

Unverferth Manufacturing Company, Inc. (Unverferth): 24325 N State St Delphos Ohio 45833

Unverferth conducts metal fabrication, cutting, welding, and metal finishing for grain and farm equipment. There is one outfall to the sanitary sewer system from the process wastewater. The facility discharges in batches to the WWTP.

4.3 IU Evaluation

A. Issuance of IU Control Mechanism

Issuance or reissuance of control mechanism/Statement of Duration:

The IU permits for Bunge, Lakeview Farms, and Unverferth have been administratively extended past the 5-year duration.

Statement of Non-Transferability:

The non-transferability statement in the IU permits for Bunge, Lakeview Farms, and Unverferth do not allow for permits to be transferred under any circumstances. If Delphos allows for permit transfers in the future, the permit must include requirements for the IU to complete from 40 CFR 403.8(f)(1)(iii)(B)(2).

Sampling Frequency:

Lakeview Farms: The IU permit for Lakeview Farms requires the facility to conduct monthly or quarterly self-monitoring, in addition to the monitoring performed by the POTW. The IU permit for Lakeview Farms also states that the facility is not required to perform any self-monitoring. Delphos told EPA that the latter is correct.

Sample Types:

The IU permits for Bunge, Lakeview Farms, and Unverferth allow for 24-hour time-proportional composite or 24-hour flow-proportional composite sampling. The IU permits only requires approval from the POTW if a grab sample is used in place of a composite sample for alternative sample (not for time-proportional).

Record Keeping Requirements:

Record-keeping requirements in the IU permits for Bunge, Lakeview Farms, and Unverferth do not require the IUs to extend record retention time when requested by EPA or the City (only during litigation or enforcement).

B. Control Authority Enforcement Activities

Identification of Monitoring/Reporting Violations:

Bunge: From April 2022 to January 2025, sampling data submitted to Delphos from Bunge indicated 19 permit limit violations for either pH and/or Hexane. The IU permit for Bunge states that “Hexane is a monitor only parameter that shall be utilized by the City and Bunge to determine if Best Management Practices for Hexane are being utilized. Exceedance of the monitoring limit will not result in an NOV unless the facility fails to provide the required follow-up reports or is continually non-responsive in working towards finding the cause of the exceedance”. EPA was not provided documentation that Delphos identified the monitoring and reporting violations.

Lakeview Farms: From June 2022 to the time of the inspection, sampling data submitted to Delphos from Lakeview Farms indicated 10 permit exceedances for O&G. Lakeview Farms did not notify Delphos of the violations, and did not have documentation that resampling was completed. EPA was not provided documentation that Delphos identified the monitoring and reporting violations.

Unverferth: The documentation provided to EPA indicates that the IU does not consistently submit the self-monitoring reports by the required due date of the 10th of each month. The following reports were documented as received by Delphos after the 10th of the month: January 2024, April 2024, August 2024, June 2023, August 2023, November 2023, December 2023, February 2022, April 2022, September 2022, October 2022, December 2022. EPA was not provided documentation that Delphos either received these reports no later than the 10th of each month, or if not received by the 10th, that Delphos identified the reporting violations.

Calculation of SNC:

At the time of the inspection, there was no documentation of how Delphos determined SNC for any of the permitted IUs.

Adherence to Approved ERP:

At the time of the inspection, Delphos did not have a written or approved Enforcement Response Plan (ERP). Delphos told EPA that enforcement authority is provided in the Sewer Use Ordinance (SUO) Chapter 924 – Pretreatment.

Escalation of Enforcement:

At the time of the inspection, Delphos did not have documentation of enforcement actions against any of the permitted IUs.

IU Inspections:

Bunge: The inspection reports provided to EPA by Delphos for Bunge indicate the total flow rate as 30,000 gallons per day (gpd). However, the surcharge analysis provided to EPA by Delphos indicates flow rate as 65,000 gpd.

Lakeview Farms: The inspection reports provided to EPA by Delphos for Lakeview Farms were incomplete. Additionally, the address included on the inspection reports do not match the address included on the IU permit.

C. IU Compliance Status

Sampling by IUs at Frequency Specified in Control Mechanism/Regulations

Bunge: Documentation indicated the IU missed required weekly pH monitoring due to equipment failure at the facility.

IU Notification within 24-hours of becoming aware of Discharge Violations, Including Slug Loading or Accidental Spill

Bunge: From April 2022 to January 2025, the self-monitoring data submitted to Delphos from Bunge indicated 19 permit limit violations for either pH and/or Hexane. EPA was not provided documentation of Bunge's notification of any of the 19 exceedances to Delphos within 24-hours of becoming aware of the violation.

Lakeview Farms: From June 2022 to the time of the inspection, sampling data submitted to Delphos from Lakeview Farms indicated 10 permit exceedances for O&G. EPA was not provided documentation of Lakeview Farm's notification of any of the 10 exceedances to Delphos within 24-hours of becoming aware of the violation.

Resampling/reporting by the IU within 30 days of knowledge of violations

Bunge: From April 2022 to January 2025, the self-monitoring data submitted to Delphos from Bunge indicated 19 permit limit violations for either pH and/or Hexane. The IU permit for Bunge states that "Hexane is a monitor only parameter that shall be utilized by the City and Bunge to determine if Best Management Practices for Hexane are being utilized. Exceedance of the monitoring limit will not result in an NOV unless the facility fails to provide the required follow-up reports or is continually non-responsive in working towards finding the cause of the exceedance". EPA was not provided documentation of Bunge's follow-up reports for the Hexane exceedances, or the required resampling within 30 days of knowledge of the permit violations.

Lakeview Farms: From June 2022 to the time of the inspection, sampling data submitted to Delphos from Lakeview Farms indicated 10 permit exceedances for O&G. EPA was not provided documentation of Lakeview Farm's resampling within 30 days of knowledge of the permit violations.

SECTION 5.0: INDUSTRIAL USER SITE VISITS

Unverferth Manufacturing Company, Inc.
24325 State Route 697 W
Delphos, Ohio 45833

Date of site visit: May 20, 2025

Inspection participants:

Unverferth:

Jeff Schulte, Plant Operations Manager
Greg Steinecker, Environmental Safety Specialist

City of Delphos:

Todd Teman, Superintendent
Jeff Stockwell, Operator

EPA:

Jennifer Bush, Environmental Scientist
Gigi Giampietro, Environmental Engineer
Matthew Schulte, Environmental Scientist

EPA and Delphos arrived at the Unverferth Manufacturing Company, Inc. (Unverferth) facility at 1:00 p.m. EDT. EPA and Delphos were met by Jeff Schulte (Plant Operations Manager) and Greg Steinecker (Environmental Safety Specialist). EPA began the Opening Conference at 1:08 p.m. EDT, presented credentials, and explained the purpose of the site visit. EPA confirmed there was no claim of confidential business information (CBI) at the time of the inspection. Delphos led the remainder of the inspection.

Unverferth staff provided EPA and Delphos the following information during the Opening Conference:

- Unverferth is a metal finishing facility for the agricultural industry.
- The majority of the facility's wastewater discharge is generated from the three (3) Wash Bays, which all accumulate to one sump and are discharged into the onsite waste treatment system.
- The average flow is approximately 3,900 gpd, with a maximum of 4,300 gpd. If production is slower onsite, the flow is approximately 2,300 gpd. At the time of the inspection, production was slower, and Unverferth staff anticipated the reduced production rate for the rest of the 2025 calendar year.
- Unverferth receives steel as a raw material.
- Chemical storage, including wastewater chemicals, iron phosphate, and pretreatment chemicals, are kept by the Paint Booth 5 and Paint Booth Kitchen (near the three (3) Wash Bays).

- Unverferth trains personnel for spill response, and keeps a spill plan onsite.
- Monthly self-monitoring is completed for metals. Unverferth works with Alloway Environmental Testing and Laboratory for compliance monitoring. There is not a Toxic Organic Management Plan (TOMP) implemented onsite.
- The solvents used within the paint lines are flushed and captured in 55-gallon drums to be hauled for offsite disposal every 90 days.
- The onsite wastewater treatment process is as follows:
 - Overflow wastewater from the Wash Bay areas discharge through a 3-stage system, referred to by Unverferth staff as the “MRS system”.
 - The first stage includes a gravel/sand filter to collect O&G within the discharge.
 - As the wastewater discharge flows through each stage, Unverferth adjusts the pH and the wastewater continues through MRS media to remove the metals, volatile organic compounds (VOCs), or semi-volatile organic compounds (SVOCs).
 - Any solids generated are hauled offsite.
 - The maximum flow rate is approximately 2 gallons per minute (gpm).
- Unverferth told EPA and Delphos that they are adding a powder coating monorail line to the facility. The new line will discharge into a new onsite waste treatment system with a flow rate of 6-8 gpm. The new line and onsite waste treatment system will add an outfall to the sanitary system. The new outfall will only include process wastewater discharge. The new onsite waste treatment system will mirror the current system, but on a larger scale.

The opening conference ended at 1:31 p.m. EDT. At 1:32 p.m. EDT, Unverferth led EPA and Delphos on a walkthrough of the facility. Unverferth showed the following to EPA and Delphos:

- Paint Booths 1 and 2.
- Wash Bay (1): Parts are cleaned, hung to dry, then go through the Primer Booth, the Paint Booth (top coat), and the Flash-Off Oven.
- Wash Bay (2): Powder Coat Wash Bay.
- Wash Bay (3): Paint Wash Bay.
- All floor drains lead to the onsite waste treatment system, except the floor drains in chemical storage area.
- All chemicals are held in Paint Kitchen area. The floor drains in this area discharge to an oil and water separator outside the building. The separator has the capacity to hold 1000 gallons. The separator is not connected to the storm or sanitary system, but is pumped to be hauled offsite.
- Waste Treatment:
 - Tank 1/Tank 2: Storage prior to pH adjustment tank. Unverferth also add peroxide in this step for odor control.
 - When flow is high, the wastewater flows to the 3-stage MRS filters prior to going through the discharge tank. The discharge is continuous, but only when there is an overflow from the tanks.
 - The MRS system has a screen with visible alarms on the control panel.

- Sampling Locations: The final stage of the MRS is where Unverferth collect grab samples, and the final discharge tank (tank directly after final MRS stage) is where composite samples are taken. Composite samples are taken with a peristaltic pump and automatic sampler.
- New System:
 - A reverse osmosis (RO) system will be utilized on the new system.

The facility walkthrough ended at 2:21 p.m. EDT. Delphos told Unverferth to notify the WWTP staff once the new system comes online, and new inspection will be conducted. EPA and Delphos left the Unverferth facility at 2:25 p.m. EDT.

Lakeview Farms Inc
1700 Gressel Drive
Delphos, Ohio 45833

Date of site visit: May 21, 2025

Inspection participants:

Lakeview Farms:

Adam Caskey, Maintenance Manager
 Steve Waligora, Environmental Health and Safety (EHS) Director

City of Delphos:

Todd Teman, Superintendent
 Brandon Fetzner, Assistant Superintendent

EPA:

Jennifer Bush, Environmental Scientist
 Gigi Giampietro, Environmental Engineer
 Matthew Schulte, Environmental Scientist

EPA and Delphos staff arrived at the Lakeview Farms Inc (Lakeview Farms) facility at 8:04 a.m. EDT. EPA and Delphos were met by Adam Caskey (Maintenance Manager) and Steve Waligora (EHS Director). EPA began the Opening Conference at 8:15 a.m. EDT, presented credentials, and explained the purpose of the site visit. EPA confirmed there was no claim of confidential business information (CBI) at the time of the inspection. Delphos led the remainder of the inspection.

Lakeview Farms staff provided EPA and Delphos the following information during the Opening Conference:

- Lakeview Farms is a food manufacturing facility, specifically for dips and desserts.
- The facility's wastewater discharge is generated from any water used on the production floors, and any sanitation conducted onsite.

- The typical flow is 250 gpm through the onsite DAF unit. The only wastewater that doesn't discharge through the DAF is sanitary/domestic waste.
- Raw materials include water, sugar, gel base, dairy fare, rice, eggs, cheese, milk, and butter.
- Chemicals stored in the facility include caustics, floor sanitizer, foams, polymers, and coagulants. Lakeview Farms said foams are used for cleaning (ex: Dawn Soap Foaming Agents). There are floor drains near the chemical storage, which all lead to the onsite treatment. All cleaning agents used onsite are discharged through the DAF system.
- Lakeview Farms trains personnel for spill response.
- Lakeview Farms does not conduct self-monitoring. All monitoring of the discharge is conducted by Delphos WWTP.
- The process wastewater discharge from Lakeview Farms is currently a batch discharge. Lakeview Farms staff told EPA and Delphos that they hope to change to a continuous discharge in the future.
- Lakeview Farms could not confirm if the approved Permit to Install from OEPA includes the current pretreatment onsite.
- Lakeview Farms told Delphos that operational issues occurred since the last inspection. In response to the issues, Lakeview Farms fixed piping and rerouted discharge to the onsite treatment. The discharge to Delphos WWTP was halted during this time.
- The onsite pretreatment process includes discharge to the collection pit, a separation screen, a holding tank, a DAF unit, and then discharge through the effluent. Aeration is utilized in the holding tank.
- The operator at Lakeview Farms collects samples from the DAF to determine pH and turbidity levels for internal use. Lakeview Farms could not confirm if the operator onsite is a certified operator.

The opening conference ended at 8:43 a.m. EDT. At 8:51 a.m. EDT, Lakeview Farms led EPA and Delphos on a walkthrough of the facility. Lakeview Farms showed the following to EPA and Delphos:

- Production Area:
 - At the time of the inspection, Lakeview Farms staff were manually pushing all foaming cleaners and miscellaneous solids (food items spilled onto floors) into the floor drains with brooms/squeegees.
- Wastewater Area:
 - Discharge from the production areas are sent to the underground collection pit, then the separation screen, the transfer tank, the holding tank (outside of the building), the DAF, and then discharged to the Delphos WWTP.
- Kettle Room:
 - At the time of the inspection, the floor was covered in foam and cleaning products, which were being discharged through the floor drains. EPA observed that some floor drains were open, and some floor drains had baskets to catch solids.

- Lakeview Farms staff told EPA and Delphos that cleaning of the floors is not done only at a certain time of day, but the cleaning products are used continuously on the floors to keep the surfaces clean. The cleaning products are rinsed off before the weekend/at the end of production.
- Gelatin Area:
 - At the time of the inspection, Lakeview Farms production staff were pushing red gelatin discard through the floor drain during a cleaning.
- Lakeview Farms told EPA and Delphos that staff will clean out the drains approximately once per week.

The facility walkthrough ended at 9:24 a.m. EDT. EPA and Delphos left the Lakeview Farms staff at 9:28 a.m. EDT and conducted a walkthrough of the discharge location outside (without Lakeview Farm staff).

- There are two holding tanks located outside of the Lakeview Farms facility, one that holds sludge, and one that holds wastewater discharge.
- The wastewater discharge holding tank is after the DAF in the pretreatment process, and has aeration within the holding tank.
- Delphos staff opened the manhole to view the discharge location. At the time of the inspection, the wastewater discharge was tinted pink and cloudy.

EPA and Delphos completed the walkthrough and left the Lakeview Farms facility at 9:49 a.m. EDT.

SECTION 6.0: SUMMARY OF FINDINGS

EPA held a Closing Conference with Delphos WWTP on May 21, 2025 at 10:25 a.m. EDT. The following items were discussed:

A. Areas of Concern

40 C.F.R. Part	Site Background & Inspection Observations	Report Section
403.8(f)(5)	Delphos WWTP has not developed and implemented an enforcement response plan.	Section 3.0. E and Section 4.3. B
40 C.F.R. Part	File Reviews	Report Section
403.8(f)(1)(iii)(B)(1)	The IU permits for Bunge, Lakeview, and Unverferth were administratively extended past the 5-year duration.	Section 4.3. A

403.8(f)(1)(iii)(B)(4)	The IU permit for Lakeview includes both a requirement to conduct monthly and quarterly self-monitoring, and states the IU is not required to conduct self-monitoring. The IU permit must explicitly state the sampling frequency for the IU to complete.	Section 4.3. A
403.8(f)(1)(iii)(B)(4) and Part 136	The IU permits for Bunge, Lakeview, and Unverferth allow for either 24-hour time proportional or 24-hour flow proportional composite sampling, and only requires approval from Delphos WWTP if grab samples are used as an alternative. Delphos WWTP must approve time-proportional sampling as an alternative as well.	Section 4.3. A
403.12(o)(2)	The IU permits for Bunge, Lakeview, and Unverferth do not include the requirement for IUs to extend record retention time when requested by EPA or the City of Delphos.	Section 4.3. A
403.8(f)(2)(vii)	EPA was not provided documentation that Delphos identified the monitoring and reporting violations from Bunge, Lakeview, or Unverferth.	Section 4.3. B
403.8(f)(2)(viii)	EPA was not provided documentation describing how Delphos determines SNC for the permitted IUs.	Section 4.3. B
403.8(f)(5)	EPA was not provided documentation of Delphos escalating enforcement actions against any of the permitted IUs.	Section 4.3. B
403.8(f)(2)(v)	The IU inspections for Bunge and Lakeview indicated inaccurate or incomplete information/documentation.	Section 4.3. B
403.12(e)&(h)	The documentation provided to EPA indicated Bunge missed required weekly pH monitoring.	Section 4.3. C
403.12(g)(2)	EPA was not provided documentation of IUs notifying Delphos of permit violations within 24-hours of becoming aware.	Section 4.3. C
403.12(g)(2)	EPA was not provided documentation of IUs resampling within 30 days of becoming aware of permit violations.	Section 4.3. C
403.8(f)(3) and Section II.Z.2. of the NPDES Permit	The permittee shall have sufficient resources and qualified personnel to fully implement all aspects of its approved pretreatment program.	Section 3.0 G
403.8(f)(1)(iii)(B)(2)	The IU permits for Bunge, Lakeview, and Unverferth do not currently allow for transfers. If Delphos WWTPs allows transfers in the future, the permit must require the prior notification from the IU to the WWTP, and the IU must provide a copy of the existing IU Permit to the new owner or operator.	Section 4.3. A

ATTACHMENT I: PHOTO LOG

Delphos Wastewater Treatment Plant
EPA Inspection May 19, 2025 - May 21, 2025
All photos taken by Jennifer Bush, Environmental Scientist, U.S. EPA
Camera: Ricoh WG-4 SR Adventure Proof, Serial No. 3101181



1: RIMG0320

Description: Paint wash bay with rinse occurring into floor drain and discharging into the onsite waste treatment system

Location: Unverferth Manufacturing Company, Inc.

Date/Time: May 19, 2025 - May 21, 2025/1:40 p.m. EDT



2: RIMG0321

Description: Oil and water separator outside the facility. Holds 1000-gallons in case of a spill from the Paint Kitchen

Location: Unverferth Manufacturing Company, Inc.

Date/Time: May 19, 2025 - May 21, 2025/1:42 p.m. EDT



3: RIMG0322

Description: Overview of Paint Kitchen area with floor drains that lead to the oil/water separator in Photo 2

Location: Unverferth Manufacturing Company, Inc.

Date/Time: May 19, 2025 - May 21, 2025/1:43 p.m. EDT



4: RIMG0323

Description: pH adjustment tank overview prior to the MRS treatment system

Location: Unverferth Manufacturing Company, Inc.

Date/Time: May 19, 2025 - May 21, 2025/1:49 p.m. EDT



5: RIMG0324

Description: Overview of MRS stages 1-3 with 3 on the right side. Right side tank is also the grab sample location (prior to the discharge tank).

Location: Unverferth Manufacturing Company, Inc.

Date/Time: May 19, 2025 - May 21, 2025/1:53 p.m. EDT



6: RIMG0325

Description: Final discharge tank, and composite sample location

Location: Unverferth Manufacturing Company, Inc.

Date/Time: May 19, 2025 - May 21, 2025/1:55 p.m. EDT



7: RIMG0326

Description: Overview of new onsite waste treatment system with clarifier on right.

Location: Unverferth Manufacturing Company, Inc.

Date/Time: May 19, 2025 - May 21, 2025/2:04 p.m. EDT



8: RIMG0327

Description: Overview of lower level of the onsite waste treatment system. Solid collection on left, collection pit underground, and transfer tank on the right side.

Location: Lakeview Farms Inc.

Date/Time: May 19, 2025 - May 21, 2025/9:06 a.m. EDT

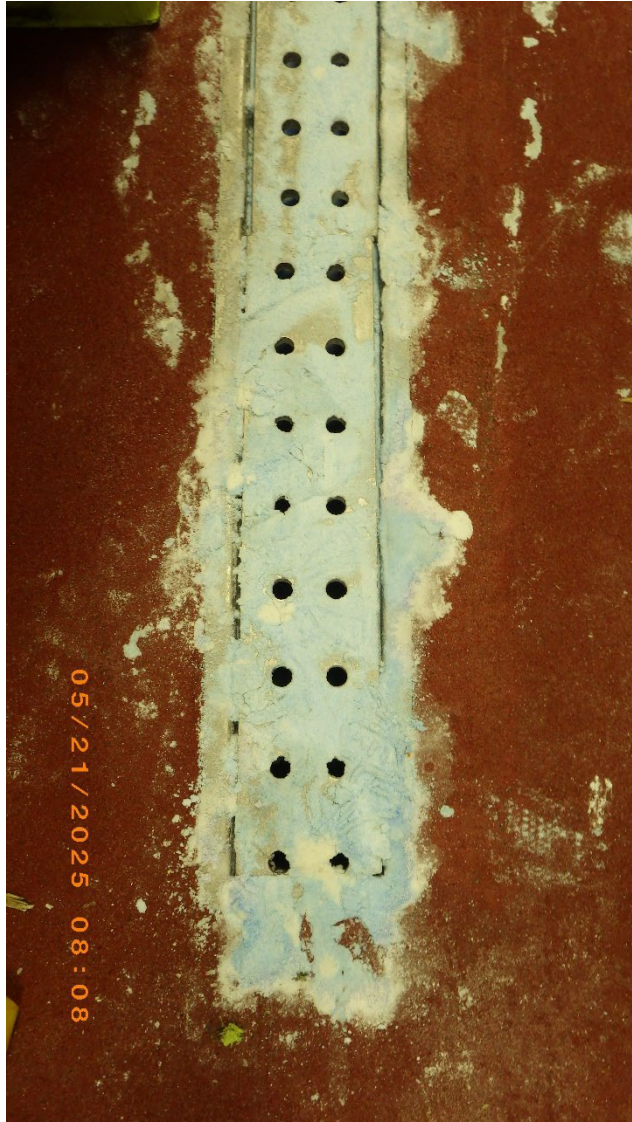


9: RIMG0328

Description: Overview of upper level of waste treatment system, showing the DAF unit.

Location: Lakeview Farms Inc.

Date/Time: May 19, 2025 - May 21, 2025/9:07 a.m. EDT



10: RIMG0329

Description: Close-up of floor drain with sanitizer powder entering the drain. This drain discharges into the onsite waste treatment system prior to discharging to Delphos WWTP.

Location: Lakeview Farms Inc.

Date/Time: May 19, 2025 - May 21, 2025/9:08 a.m. EDT



11: RIMG0330

Description: Floor drain in production area with cleaning products/foam running into floor drain in background. Red arrow shows floor drain location.

Location: Lakeview Farms Inc.

Date/Time: May 19, 2025 - May 21, 2025/9:10 a.m. EDT



12: RIMG0331

Description: Kettle Room – cleaning products used continuously on production area with cleaners discharging to the City through the floor drains/onsite waste treatment system. Red arrow shows location of floor drain.

Location: Lakeview Farms Inc.

Date/Time: May 19, 2025 - May 21, 2025/9:14 a.m. EDT



13: RIMG0332

Description: Discharge holding tank with aeration unit (blue) in foreground

Location: Lakeview Farms Inc.

Camera Direction: West

Date/Time: May 19, 2025 - May 21, 2025/9:39 a.m. EDT



14: RIMG0333

Description: Camera view down into manhole prior to sampling location. Discharge at the time of the inspection was light pink and cloudy.

Location: Lakeview Farms Inc.

Date/Time: May 19, 2025 - May 21, 2025/9:41 a.m. EDT



15: RIMG0334

Description: Sampling location with Photo 14 manhole in background. Sampling location is before the line connects to the Delphos WWTP

Location: Lakeview Farms Inc.

Camera Direction: Northeast

Date/Time: May 19, 2025 - May 21, 2025/9:44 a.m. EDT