

INSPECTION REPORT

Inspection Entry Date/Time	04/30/2025 8:52 AM (CT)	Announced: No
Inspection Exit Date/Time	04/30/2025 11:40 AM (CT)	Access: Granted
Weather	Sunny and close to 60 degrees Fahrenheit (F)	
Media	Water	
Statute(s)/Program(s)	Clean Water Act, NPDES, Stormwater – Industrial	
Type of Inspection	Industrial Stormwater Inspection (ISI)	
Permittee Name	WOW Logistics	
Facility or Site Name	TreeHouse Foods	
Facility/Site Physical Address	1164 O'Hare Blvd	
City, State, Zip Code	Hobart, Wisconsin 54115	
County	Brown	
Facility GPS Coordinates	44.454599, -88.134539	
Mailing Address	1450 McMahon Road	
City, State, Zip Code	Neenah, Wisconsin, 54956	
FRS ID	110071155176	
Permit Number	WIR05IA08	
SIC and/or NAICS	4225 – General Warehousing and Storage	
Regulatory Representatives Participating in Inspection:		
Title	Name	Organization
N/A	N/A	N/A
Lead Inspector:		
Danny Nguyen		06/18/2025
	EPA REGION 5	nguyen.danny@epa.gov (440) 250-1709
Supervisor Review:		
Mr. Brooke Furio	BROOKE FURIO	
	EPA REGION 5	furio.brooke@epa.gov (440) 250-1705

SECTION I – INTRODUCTION

Site Entry and Inspection Objectives

EPA REGION 5 inspector, Danny Nguyen, arrived at WOW Logistics Company (WOW), located at 1164 O’Hare Boulevard (Blvd), Hobart, Wisconsin 54115, at 8:52 AM (CT) on 04/30/2025 for an unannounced inspection. Mr. Nguyen presented his credentials to Mr. Dave Hurlbut and informed him that this was an EPA REGION 5 inspection to investigate elements of the Clean Water Act (CWA) and applicable regulations. This report is based on information supplied by WOW’s representatives, direct observations made by the EPA REGION 5 inspectors, records and reports maintained by the permittee and other information including: photographs taken by EPA REGION 5 inspectors, physical evidence collected by the EPA REGION 5 inspectors, measurements taken by EPA REGION 5 inspectors, verbal or written statements made by information supplied by WOW’s 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 inspectors by WOW’s 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	Danny Nguyen	NPDES Inspector	Yes	Yes
TreeHouse Foods	Dave Hurlbut	Warehouse Manager	Yes	Yes
TreeHouse Foods	Chris Kanikula	EHS Manager, Manufacturing Plant	Yes	Yes
WOW Logistics	Tony Hill	Facility Manager	Yes	No

Facility/Site Description

EPA REGION 5 inspector confirmed the following facility information:

WOW applied for and was issued a General Permit to Discharge Under the United States Environmental Protection Agency (EPA) National Pollution Discharge Elimination System NPDES ID WIR05IA08. The 1164 O’Hare Blvd facility is owned by the WOW Logistics Company and leased for use by TreeHouse Foods. The facility has been leased for approximately twenty years under various brand names (Dean Foods, Bay Valley Foods). The approximately 510,000 square feet single building is used for mainly private brands pickles repackaging, storage, and distribution along with some dry dairy and oatmeal. There is no manufacturing at the facility.

The facility has two discharge points where stormwater flows and is collected and then conveyed to the Village of Hobart sewer system. Best management practices (BMPs) employed include good housekeeping and maintenance on the outside near the loading and unloading areas. Inspections and monitoring are conducted by a third-party contractor (Mach IV Engineering LLC) hired by WOW.

Facility/Site Information

Responsible official	John Elrick
Verify SIC Code	4225
Personnel conducting inspections/sampling	Brad McDermid and Randy Herter (both from Mach IV Engineering LLC)
Sampling locations	Discharge points 001 and 002 (per SWPPP)
Copy of the SWPPP	Yes at WOW office in Neenah, Wisconsin
Number of employees	30
Receiving Water	Dutchman Creek
Number/location of Stormwater Inlets/ Outfalls/Drains including near docks or storage areas and where they initially drain (MS4, ditch detention basin)	There are two main discharge points on the property (001 and 002). Discharge point 001 is located on the south side of the property just west of the employee entrance road and 002 is on the east side of the property. The site area is comprised of asphalt parking and grass areas with swales.
BMPs/Stormwater Treatment	Good housekeeping and maintenance in the loading and unloading areas outside.
Industrial activities exposed to stormwater	Limited to loading and unloading operations for transport via semi-truck of goods at the facility docks
Industrial Sector/Sub-sector	P/P1
Type of Operation	General Warehousing and Storage
Shifts/Hours/Days of Operations/Shutdowns	Two shifts operating 5:00AM to 1:30PM and 1:30PM to 10:00PM, Monday through Friday
Size of Facility	21 acres
Is the SWPPP team present	No (Mach IV was not present)
Name of the person engaging with the inspector	Dave Hurlbut
Type of materials and/or vehicles stored outdoors	Semi-trailer trucks

Location(s)

Location/Area/Sub-area	Description
Indoor area	Consist of a work area named Bright Line for repackaging of pickles
Outdoor area	The outdoor area consists of asphalt parking, trash roll-offs and bins, grass areas with swales, loading and unloading areas, propane storage, and semi-trailer truck parking area

SECTION II – OBSERVATIONS

Location: Indoor Area		
Observation #: DN1-OB-001	Date: 04/30/2025	Weather: Sunny and close to 65 degrees F
EPA observed the following during the walkthrough of the indoor area: • Drain in ambient area. Per Mr. Hurlbut, the drain goes to the Hobart city sewer and is used for mop, pressure wash, and scrubber wash water. The entire floor is cleaned out quarterly. There is a separate permit with the city for the inside drains. • In the Bright Line repackaging area, Mr. Nguyen observed three additional drains that go to the city sewer system according to Mr.Hurlbut. • ECOLAB Lift RT is the soap used for cleaning the floors. • The forklift charging area, riding floor scrubber, and warehouse storage areas were observed. • Mr. Hurlbut stated there is no raw or used oil, facility vehicles, washing, painting operations, or spraying of pesticides on-site. • All forklifts are leased. When there is a bad forklift battery, it gets replaced by the leaser (batteries are not kept on-site).		
Photos 1. DSCN1100.JPG 2. DSCN1101.JPG 3. DSCN1102.JPG 4. DSCN1103.JPG 5. DSCN1104.JPG 6. DSCN1105.JPG 7. DSCN1106.JPG		

Location: Outdoor area		
Observation #: DN1-OB-002	Date: 04/30/2025	Weather: Sunny and close to 65 degrees F
EPA observed the following during the walkthrough of the outdoor area: • Mr. Nguyen observed three open non-covered large roll-offs filled with expired product that could not be sold according to Mr. Hurlbut. • A trash bin with an open lid was observed.		

- Mr. Nguyen observed a drainage ditch and silk fence on the west side of the property. Mr. Hurlbut stated the ditch and silk fence are on the adjacent residential property and were installed by the residential property owner.
- Mr. Nguyen and walked and observed the north side of the property area behind the building.
- The swale area on the northeast side of the property was observed.
- Mr. Nguyen observed discharge point 002 along the adjacent property on the east side of the facility.
- Three drains (Photos DSCN 1116-DSCN1119) were observed in the asphalt parking lot south of the facility: One drain near the loading and unloading dock on the east side, one drain near the main entrance to the facility, and one drain on the west side near the trash roll-offs and bin. Mr. Hurlbut stated he did know if the drains go to the city sewer system. The drains are not listed as part of the action area and discharge points.
- No permit coverage sign was observed during the outside walkthrough.

Photos

1. [DSCN1107.JPG](#)
2. [DSCN1108.JPG](#)
3. [DSCN1109.JPG](#)
4. [DSCN1110.JPG](#)
5. [DSCN1111.JPG](#)
6. [DSCN1112.JPG](#)
7. [DSCN1113.JPG](#)
8. [DSCN1114.JPG](#)
9. [DSCN1115.JPG](#)
10. [DSCN1116.JPG](#)
11. [DSCN1117.JPG](#)
12. [DSCN1118.JPG](#)
13. [DSCN1119.JPG](#)
14. [DSCN1120.JPG](#)

SECTION III – RECORDS REVIEW

Records may not be in sequential order.

Record: SWPPP		AOC: Yes
Ref #: DN1-RR-001	Reviewed By: Danny Nguyen	Reviewed Date: 5/16/2025
The latest SWPPP dated May 2, 2025 was reviewed and the following observations were made: • The SWPPP did not include directions of stormwater flow on the site map. • The SWPPP did not include loading and unloading areas and locations used for storage and disposal of wastes. • The SWPPP did not identify the three drains on the south side of the facility near the waste storage area, the main entrance, and the loading and unloading area.		

At the time of the inspection, the TreeHouse representatives could not locate a complete copy of the current SWPPP at the facility in any accessible format.		
Record: Personnel Training		AOC: Yes
Ref #: DN1-RR-002	Reviewed By: Danny Nguyen	Reviewed Date: 5/16/2025
- After review of Treehouse Food's training documents, employees at the site go through new hire orientation, emergency action plan, and pest control training that discuss spill emergency procedures, maintenance, and facility housekeeping. Training does not include overview of SWPPP. - Although some members on the SWPPP team received training, not all members listed on the SWPPP team had documentation of training.		
Record: Routine Inspections		AOC: No
Ref #: DN1-RR-003	Reviewed By: Danny Nguyen	Reviewed Date: 5/16/2025
2023-2025 routine inspection reports were reviewed.		
Record: Quarterly Visual Assessment of Stormwater Discharges		AOC: No
Ref #: DN1-RR-004	Reviewed By: Danny Nguyen	Reviewed Date: 5/16/2025
2023-2025 Quarterly Visual Assessment reports were reviewed.		
Record: Monitoring		AOC: No
Ref #: DN1-RR-005	Reviewed By: Danny Nguyen	Reviewed Date: 5/16/2025
2024-2025 Indicator Monitoring report and analysis were reviewed.		

SECTION IV – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted.

SECTION V - AREA OF CONCERN

Areas of Concern (AOC) may not be in sequential order.

The presentation of Areas of Concern does not constitute a formal compliance determination or violation.

AOC Reference #: DN1-OB-001	Location: Outdoor area
Regulation and/or Permit Requirement	
Section 2.1.2.2(c) of the EPA Multi-Sector General Permit (MSGP) requires <i>"The permittee must keep clean all exposed areas that are potential sources of pollutants. You must perform good housekeeping measures that includes keeping al dumpster lids closed when not in use to minimize pollutant discharges"</i> .	
AOC: Three large trash roll-offs and one large bin were observed open and with no cover to minimize exposure to wind and weather.	

AOC Reference #: DN1-OB-001	Location: Outdoor area
Regulation and/or Permit Requirement	
Section 1.3.5 of the EPA Multi-Sector General Permit (MSGP) requires <i>"The permittee must post a sign or other notice of permit coverage at a safe, publicly accessible location in proximity to your facility."</i>	
AOC: No permit coverage sign was observed during the outside walkthrough.	

AOC Reference #: DN1-RR-001	Record: SWPPP
Regulation and/or Permit Requirement	
Section 6.2.2.3(c & j) and (m)(iii & iv) of the EPA Multi-Sector General Permit (MSGP) requires <i>"The permittee must include a site map that includes directions of stormwater flow (use arrows), locations of stormwater inlets and discharge points and approximate outline of the areas draining to each discharge point, and locations where activities are exposed to precipitation such as loading and unloading areas and locations used for storage or disposal of waste"</i> .	
AOC: - The SWPPP did not include directions of stormwater flow on the site map. - The SWPPP did not include loading and unloading areas and locations used for storage and disposal of wastes. - The SWPPP did not identify the three drains on the south side of the facility near the waste storage area, the main entrance, and the loading and unloading area.	

AOC Reference #: DN1-RR-001	Record: SWPPP
Regulation and/or Permit Requirement	
Section 6.4 of the EPA Multi-Sector General Permit (MSGP) requires <i>“The permittee must retain a complete copy of your current SWPPP required by the permit at the facility in any accessible format.”</i>	
AOC: At the time of the inspection, the TreeHouse representatives could not locate a complete copy of the current SWPPP at the facility in any accessible format.	

AOC Reference #: DN1-RR-002	Records: Personnel Training
Regulation and/or Permit Requirement	
Section 2.1.2.8 (a) and (b)(i) of the EPA Multi-Sector General Permit (MSGP) requires <i>“The permittee must train all employees who work in areas where industrial materials or activities are exposed to stormwater or who are responsible for implementing activities necessary to comply with this permit, including all members of your SWPPP, and they must be trained in an overview of what is in the SWPPP.”</i>	
AOC: - After review of Treehouse Food’s training documents, employees at the site go through new hire orientation, emergency action plan, and pest control training that discuss spill emergency procedures, maintenance, and facility housekeeping. Training does not include overview of SWPPP. - Although some members on the SWPPP team received training, not all members listed on the SWPPP team had documentation of training.	

SECTION VI – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

The EPA REGION 5 Inspector held a closing conference with the participants listed above at 11:15AM (CT) on 04/30/2025 for the inspection. During the closing conference, Mr. Nguyen 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.

Mr. Hurlbut did not make a CBI claim. EPA communicated to Mr. Hurlbut that the inspection report will be emailed to WOW Logistics representative within 70 days of the day of the inspection.

Follow Up

The following items were requested by the inspector at the time of the inspection.

Location:	Area:	Sub-area:
DN1-CC-FD		
EPA requested a copy of the stormwater training given to TreeHouse Foods, WOW, and Mach IV Engineering LLC employees.		
Received via email on 5/14/2025 and 5/16/2025.		
DN1-CC-FD		
EPA requested TreeHouse Food's Emergency Action Plan.		
Received via email on 5/14/2025.		
DN1-CC-FD		
EPA requested any written agreement between WOW, Mach IV, and TreeHouse for delegation of stormwater responsibilities		
EPA did not receive requested documents.		
DN1-CC-FD		
EPA requested 2024 and 2025 inspection, visual assessment, and monitoring reports.		
Received uploaded documents on 5/16/2025.		
DN1-CC-FD		
EPA requested most current SWPPP.		
Received uploaded documents on 5/16/2025.		

SECTION VII – LIST OF APPENDICES

1. Photo Log
2. Document Log

APPENDIX 1: PHOTO LOG



WOW Logistics – TreeHouse Foods			DSCN1100.JPG
04/30/2025 10:16 AM	No CBI	No PII	Photographer: Danny Nguyen
Indoor drainage near Bright Line repackaging area			



WOW Logistics – TreeHouse Foods			DSCN1101.JPG
04/30/2025 10:18 AM	No CBI	No PII	Photographer: Danny Nguyen
Indoor drainage near Bright Line repackaging area			



WOW Logistics – TreeHouse Foods			DSCN1102.JPG
04/30/2025 10:24 AM	No CBI	No PII	Photographer: Danny Nguyen
Indoor drainage near Bright Line repackaging area			



WOW Logistics – TreeHouse Foods			DSCN1103.JPG
04/30/2025 10:28 AM	No CBI	No PII	Photographer: Danny Nguyen
Indoor drainage near Bright Line repackaging area			



WOW Logistics – TreeHouse Foods			DSCN1104.JPG
04/30/2025 10:31 AM	No CBI	No PII	Photographer: Danny Nguyen
Indoor Floor Scrubber			



WOW Logistics – TreeHouse Foods			DSCN1105.JPG
04/30/2025 10:32 AM	No CBI	No PII	Photographer: Danny Nguyen
Indoor Floor Cleaning Chemicals and Soap			



WOW Logistics – TreeHouse Foods			DSCN1106.JPG
04/30/2025 10:33 AM	No CBI	No PII	Photographer: Danny Nguyen
Indoor Warehouse Area			



WOW Logistics – TreeHouse Foods			DSCN1107.JPG
04/30/2025 10:38 AM	No CBI	No PII	Photographer: Danny Nguyen
Outside facing west			44.454508, - 88.13529
Outside open trash roll-offs			



WOW Logistics – TreeHouse Foods			DSCN1108.JPG
04/30/2025 10:39 AM	No CBI	No PII	Photographer: Danny Nguyen
Outside facing north			44.454493, - 88.135737
Outside open trash bin			



WOW Logistics – TreeHouse Foods			DSCN1109.JPG
04/30/2025 10:46 AM	No CBI	No PII	Photographer: Danny Nguyen
Outside facing east			44.454458, -88.136065
Outside north side of building			



WOW Logistics – TreeHouse Foods			DSCN1110.JPG
04/30/2025 10:46 AM	No CBI	No PII	Photographer: Danny Nguyen
Outside facing west			44.455345, -88.138845
Outside west side of building with silk fence from adjacent property			



WOW Logistics – TreeHouse Foods			DSCN1111.JPG
04/30/2025 10:46 AM	No CBI	No PII	Photographer: Danny Nguyen
Outside facing west			44.45536, -88.138736
Outside northeast side of property			



WOW Logistics – TreeHouse Foods			DSCN1112.JPG
04/30/2025 11:00 AM	No CBI	No PII	Photographer: Danny Nguyen
Outside facing northeast			44.455653, -88.1382
Outside facing northeast			



WOW Logistics – TreeHouse Foods			DSCN1113.JPG
04/30/2025 11:00 AM	No CBI	No PII	Photographer: Danny Nguyen
Outside facing southeast			44.455742, -88.131937
Outside east side of building with adjacent property			



WOW Logistics – TreeHouse Foods			DSCN1114.JPG
04/30/2025 11:03 AM	No CBI	No PII	Photographer: Danny Nguyen
Outside facing southeast			44.455742, -88.131928
Outside east side of building with adjacent property			



WOW Logistics – TreeHouse Foods			DSCN1115.JPG
04/30/2025 11:04 AM	No CBI	No PII	Photographer: Danny Nguyen
Outside facing southeast			44.455742, -88.131928
Outside east side of building with adjacent property			



WOW Logistics – TreeHouse Foods			DSCN1116.JPG
04/30/2025 11:06 AM	No CBI	No PII	Photographer: Danny Nguyen
Outside facing east			44.454471, -88.132607
Outside drain in front parking lot on east side			

Inspection Date:

04/30/2024



WOW Logistics – TreeHouse Foods			DSCN1117.JPG
04/30/2025 11:07 AM	No CBI	No PII	Photographer: Danny Nguyen
Outside facing south			44.454163, -88.133083
Outside drain in front parking lot on east side facing employee entrance road on east side			



WOW Logistics – TreeHouse Foods			DSCN1118.JPG
04/30/2025 11:08 AM	No CBI	No PII	Photographer: Danny Nguyen
Outside facing east			44.454407, -88.13349
Outside middle drain in front parking lot near loading/unloading dock			



WOW Logistics – TreeHouse Foods			DSCN1119.JPG
04/30/2025 11:09 AM	No CBI	No PII	Photographer: Danny Nguyen
Outside facing west			44.454462, -88.134753
Outside drain in front parking lot on the west side			

Inspection Date:

04/30/2024



WOW Logistics – TreeHouse Foods			DSCN1120.JPG
04/30/2025 11:41 AM	No CBI	No PII	Photographer: Danny Nguyen
Outside facing north			44.453275, -88.134935
Employee entrance road facing front of facility			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Sent/Uploaded By	Date Received
Email Attachment	2025 NHO Safety – Short for EPA.pptx	No	No	Christopher Kanikula	5/14/2025
Email Attachment	EHS-CR-7-816-01 Hobart DC Emergency Action Plan.doc	No	No	Christopher Kanikula	5/14/2025
Email Attachment	Pest.docx	No	No	Christopher Kanikula	5/15/2025
Uploaded Document	2021 MSGP SWPPP - WOW - 2024-03-05.pdf	No	No	Tony Hill	5/16/2025
Uploaded Document	2021 MSGP SWPPP - WOW - 2024-10-31.pdf	No	No	Tony Hill	5/16/2025
Uploaded Document	2021 MSGP SWPPP - WOW - 2025-05-02.pdf	No	No	Tony Hill	5/16/2025
Uploaded Document	2024 Q1 Sampling Analysis Results.pdf	No	No	Tony Hill	5/16/2025
Uploaded Document	2024 Q2 Sampling Analysis Results.pdf	No	No	Tony Hill	5/16/2025
Uploaded Document	2024 Q3 Sampling Analysis Results.pdf	No	No	Tony Hill	5/16/2025
Uploaded Document	2024 Q4 Sampling Analysis Results.pdf	No	No	Tony Hill	5/16/2025
Uploaded Document	2025 Q1 Sampling Analysis Results.pdf	No	No	Tony Hill	5/16/2025
Uploaded Document	D1 2025-03-31.pdf	No	No	Tony Hill	5/16/2025
Uploaded Document	D1 2025-04-21.pdf	No	No	Tony Hill	5/16/2025
Uploaded Document	D1 2025-05-02.pdf	No	No	Tony Hill	5/16/2025
Uploaded Document	D2 2025-03-31.pdf	No	No	Tony Hill	5/16/2025
Uploaded Document	D2 2025-04-21.pdf	No	No	Tony Hill	5/16/2025
Uploaded Document	D2 2025-05-02.pdf	No	No	Tony Hill	5/16/2025
Uploaded Document	Links to Previous SWPPPs.docx	No	No	Tony Hill	5/16/2025
Email Attachment	A_Training Log_2023_06_27.pdf	No	No	Tony Hill	5/20/2025
Email Attachment	A_Training Log_2024_06_27.pdf	No	No	Tony Hill	5/20/2025