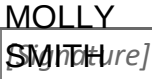


INSPECTION REPORT

Inspection Entry Date/Time	February 22, 2024, 10:30 a.m. (CST)	Announced: No	
Inspection Exit Date/Time	February 22, 2024, 05:30 p.m. (CST)	Access: Granted	
Weather	Rainy, drizzle, off and on through the day		
Media	Water		
Statute(s)/Program(s)	Clean Water Act, National Pollutant Discharge Elimination System (NPDES) permit program		
Type of Inspection	Industrial Stormwater Inspection (ISI)		
Permittee Name	Danone US, LLC		
Facility or Site Name	Danone		
Facility/Site Physical Address	216 Southgate Drive		
City, State, Zip Code	Minster, OH 45865		
County/Borough/Parish			
Facility GPS Coordinates	40.3836, -84.3748		
Mailing Address (If different)	Elizabeth.MASTELLER@danone.com		
FRS ID	110000395787		
Permit Number(s) (If Applicable)	OH0078531		
SIC and/or NAICS	31151		
Lead Inspector:			
William Jones	 Digitally signed by WILLIAM JONES Date: 2024.04.22 15:00:39 -05'00'		
	EPA REGION 5	Jones.William@epa.gov	(312) 886-6058
Supervisor Review:			
Molly Smith	 Digitally signed by MOLLY SMITH Date: 2024.04.22 15:57:32 -05'00'		
	EPA REGION 5	Smith.Molly@epa.gov	

SECTION I – INTRODUCTION

Site Entry and Inspection Objectives

EPA Region 5 Lead Inspector, William Jones, arrived at Danone (the “Site” or “Facility”), located at 216 Southgate Drive, Minster, Ohio 45865, at 10:30 a.m. (CST) on February 22, 2024, for an unannounced inspection. EPA Region 5 Lead Inspector presented credentials to Dave Merritt and informed them that this was an EPA Region 5 inspection to investigate elements as authorized by Clean Water Act (CWA) Section 308 and

implementing regulations. This report is based on information supplied by Danone representatives, direct observations made by EPA Region 5 inspectors, records and reports maintained by the permittee and other information including: photographs taken by EPA Region 5 inspector(s), verbal or written statements made by information supplied by Danone 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 Danone representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or subsequent to the Inspection from a review of US Environmental Protection Agency (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	William Jones	Lead Inspector	Yes	Yes
EPA Region 5	Joe Forth	Environmental Engineer	Yes	Yes
Danone	Dave Merritt	Senior Plant Director	Yes	Yes
Danone	Brian Scott	Senior Maintenance Manager	Yes	Yes
Danone	Elizabeth Masteller	Senior EHS Manager	Yes	Yes
Danone	Adam Milner	Engineering Director	No	Yes
Danone	Toby Goecke	Production Director	No	Yes

Facility/Site Description

EPA REGION 5 lead inspector confirmed the following facility information:

Facility/Site Information

Location(s)

Location/Area/Sub-area	Description
Storm Sewer Outfall	Storm Sewer Outfall into Miami-Erie Canal
Facility Storm Outfalls	Permitted outfall locations on north side of facility
Outdoor material	Outdoor material area located at the main plant
Outdoor refueling area	Outdoor refueling area located at the main plant
Graham packaging receiving area	Receiving area located at the main plant
Pretreatment Plant	This is a separate area where their process wastewater is treated before it goes to the Village of Minster

SECTION II – OBSERVATIONS

Location: Storm Sewer Outfall		
Observation #: WJ1-OB-001	Date: February 22, 2024	Weather: rainy
The storm sewer that Danone reportedly discharges into appeared to be relatively clear where it entered the		

canal.
Photo(s) 1 to 3

Location: Facility Storm Outfalls		
Observation #: WJ1-OB-002	Date: February 22, 2024	Weather: rainy
The storm sewer outfalls (1, 2 and 4) that Danone has on the northside of the building are controlled with valves, which are normally kept closed and which would have to be opened for a discharge to occur. The storm pond in this location would overflow back to one of the outfalls.		
Photo(s) 4 to 8		

Location: Outdoor material area		
Observation #: WJ1-OB-003	Date: February 22, 2024	Weather: rainy
Photos 9-11 show an area where metal is discarded into hoppers. The metal appeared oily and there was metal outside of the uncovered hoppers, along with an oily sheen on the ground leading towards a storm drain. Photo 12 shows an outdoor material area that is mainly under a roof.		
Photo(s) 9 to 12		

Location: Outdoor refueling area		
Observation #: WJ1-OB-004	Date: February 22, 2024	Weather: rainy
Photos 13 and 14 shows a refueling area with used absorbent material left on the ground. An oily sheen can be seen in one of the photos.		
Photo(s) 13 to 14		

Location: Graham packaging receiving area		
Observation #: WJ1-OB-005	Date: February 22, 2024	Weather: rainy
Plastic pellets (white granules) were observed outdoors on the ground.		
Photo(s) 15 to 16		

Location: Pretreatment plant		
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Observation #: WJ1-OB-006	Date: February 22, 2024	Weather: rainy
Recent grading work has left the ground unstabilized and muddy water is making its way into the storm drain inlets, which drain to storm water outfall 3.		
Photo(s) 17 to 21		

SECTION III – RECORDS REVIEW

Records may not be in sequential order.

Record: Facility Map		AOC: No
Ref #: WJ1-RR-001	Reviewed By: William Jones	Reviewed Date: November 2, 2023
A map of the facility was emailed to William Jones that shows the storm drain inlets and connections. This verified that the locations in the main facility. Photos attached are connected to the storm sewer pipe on the on the side of the facility that runs underneath First Street. Also, the Graham packing facility has storm drains outside of it that connect into the same storm sewer system. See Appendix 3 for a summary of effluent exceedances.		

SECTION IV – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted.

SECTION V - AREAS OF CONCERN

Permit OH0078531, Part I, A. Final Effluent limitations and Monitoring Requirements

Permit OH0078531, Part IV, C.1 "You shall minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings...."

Permit OH0078531, Part IV, C.2 "Good housekeeping. You shall keep clean all exposed areas that are potential sources of pollutants using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers."

Permit OH0078531, Part IV, C.4 "Spill Prevention and Response Procedures. You shall minimize the potential for leaks, spills and other releases that may be exposed to stormwater and develop plans for effective response to such spills if or when they occur. At a minimum, you shall implement:...c. Procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases..."

Permit OH0078531, Part IV, C.5. "Erosion and Sediment Controls. You shall stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, and the resulting discharge of pollutants..."

See above observations in section 2 and 3 related to the areas of concern.

SECTION VI – CLOSING CONFERENCE AND FOLLOW UP**Closing Conference**

The EPA REGION 5 Lead Inspector held a closing conference with Facility personnel at 04:55 p.m. (EST) on October 25, 2023, 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.

William Jones, along with the attendees listed above, were present for the closing conference. Mr. Jones shared that the observations and Areas of Concern were preliminary. Mr. Jones confirmed that no information gathered was considered Confidential Business Information.

A copy of the Storm Water Pollution Prevention Plan, plant layout showing storm sewers and detention pond were requested. Information was requested for when the Facility started to discharge indirectly to Minister, as well as dates of the storm water training of the Facility team.

Mr. Jones stated that the spill of diesel needed to be recorded in the SWPPP. He also noted that the Facility's SWPPP inspections are not in the binder. The training log was not up to date.

The housekeeping on the site was not good in the areas with the oily metal scrap bins with the oily sheen on the ground. Also, the refueling tank spill was not cleaned up properly with the absorbent material left behind. The plastic pellets we observed near the Graham area needed to be addressed.

At the Pretreatment area, the sediment laden water running into the outfall from the disturbed area needed to be addressed.

Elizabeth Masteller indicated that January 11th, 2024, was the last time the Facility opened stormwater outfall 1

and 2.

Follow Up

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

Location:	Area:	Sub-area:
WJ1-AF-001		
Facility storm drain map, which was emailed during the inspection to William Jones.		

SECTION VII – LIST OF APPENDICES

- 1. Photo Log
- 2. Document Log
- 3. Discharge Monitoring Report results

APPENDIX 1: PHOTO LOG



Photograph 1. Storm Sewer Outfall into Miami Erie Canal			IMGP0001.JPG
February 22, 2024/1:17 p.m.		No PII	Photographer: William Jones
Near Canal (45) and First Street			
North-east			



Photograph 2. Storm Sewer Outfall into Miami Erie Canal. Same outfall as photo 1.			IMGP0002.JPG
February 22, 2024/1:18 p.m.		No PII	Photographer: William Jones
Near Canal (45) and First Street			
Camera Direction: South-west			



Photograph 3. Storm Sewer Outfall into Miami Erie Canal. Same outfall as photo 1.			IMGP0003.JPG
February 22, 2024/1:18 p.m.		No PII	Photographer: William Jones
Near Canal (45) and First Street			
Camera Direction: South-east			



Photograph 4. Danone outfall 002 and sign			IMGP0004.JPG
February 22, 2024/1:43 p.m.		No PII	Photographer: William Jones
near south main street and first street			
Camera Direction: South-west			



Photo 5. Manhole near outfall 001. Mr. Scott believes the pipe passing though the chamber is a sanitary line.			IMGP0005.JPG
February 22, 2024/1:52 p.m.		No PII	Photographer: William Jones
Northside of Danon building			
Looking down into manhole			



Photograph 6. Outfall 001 with sign.			IMGP0006.JPG
February 22, 2024/1:53 p.m.		No PII	Photographer: William Jones
Northside of Danon Building and South of First street			
View looking south			



Photograph 7. Outfall 004			IMGP0007.JPG
February 22, 2024/1:59 p.m.		No PII	Photographer: William Jones
Northside of Danone facility and south of First Street			
View looking south			



Photograph 8. Sampling area at retention pond			IMGP0008.JPG
February 22, 2024/2:03 p.m.		No PII	Photographer: William Jones
Northside of facility and south of First Street			
View looking south			



Photograph 9. Uncovered metal recycling hoppers. An oily sheet can be seen on the pavement coming from the hoppers			IMGP0009.JPG
February 22, 2024/2:34 p.m.		No PII	Photographer: William Jones
Shipping/loading area at Danone			
View looking southwest			



Photograph 10. Uncovered metal recycling hoppers. Metal is outside of the hoppers. An oily sheen can be seen on the ground.			IMGP0010.JPG
February 22, 2024/2:33 p.m.		No PII	Photographer: William Jones
Shipping/loading area			
View looking south			



Photograph 11. Oily metal was observed inside the hoppers. An oily sheen was flowing towards a storm drain inlet in the top of the photograph			IMGP0011.JPG
February 22, 2024/2:35 p.m.		No PII	Photographer: William Jones
Recycling hoppers and shipping area			
View looking east			



Photograph 12. Miscellaneous equipment storage			IMGP0012.JPG
February 22, 2024/2:39 p.m.		No PII	Photographer: William Jones
Shipping and loading area.			[Geographic Coordinates]
Looking Northwest			



Photograph 13. Diesel Fuel tank with spill cleaning materials around the tank. An oily sheen can be seen at the bottom left of the photo.			IMGP0013.JPG
February 22, 2024/2:46 p.m.		No PII	Photographer: William Jones
Northwest side of shiping area			
View looking Northeast			



Photograph 14. Diesel Fuel tank with fuel cleanup materials present around refueling area. It was raining during the inspection. The drain valve appeared to be open and water was draining out of it.			IMGP0014.JPG
February 22, 2024/2:49 p.m.		No PII	Photographer: William Jones
Northeast side of shipping area.			
View looking west			



Photograph 15. Graham Packaging Receiving area. Pleastic pellets were observed on the ground.			IMGP0015.JPG
February 22, 2024/2:56 p.m.		No PII	Photographer: William Jones
East side of the general shipping area.			
View looking west			



Photograph 16. Graham Packaging Receiving area. Pleastic pellets were observed on the ground			IMGP0016.JPG
February 22, 2024/2:56 p.m.		No PII	Photographer: William Jones
East side of the general shipping area.			
View looking west			



Photograph 17. Silty water can be seen flowing from the unstabilized area near the center of the photograph to the bottom left corner of the photograph.			IMGP0017.JPG
February 22, 2024/3:15 p.m.		No PII	Photographer: William Jones
Driveway at Danone Wastewater Pretreatment Plant.			
View looking northeast			



Photo 18. Silty water can be seen flowing from the right of the photograph to the left. This is the same flow of water that is show in photograph 17.			IMGP0018.JPG
February 22, 2024/3:15 p.m.		No PII	Photographer: William Jones
Driveway at Danone Wastewater Pretreatment Plant.			
View looking Northeast			



Photo 19. Silty water can be seen flowing from the top center of the photograph to the storm drain inlet at the bottom of the phtograph. This is the same flow of water that is show in photograph 18.			IMGP0019.JPG
Date/Time: February 22, 2024/3:18 p.m.		No PII	Photographer: William Jones
Driveway at Danone Wastewater Pretreatment Plant.			
View looking Northeast			



Photograph 20. Storm Drain inlet/location of outfall 003			IMGP0020.JPG
February 22, 2024/3:19 p.m.		No PII	Photographer: William Jones
West side of Danone Wastewater Pretreatment Plant			
View looking west			



Photograph 21. Moving Bed Biofilm Reactor process			IMGP0021.JPG
February 22, 2024		No PII	Photographer: William Jones
Danone Wastewater Pretreatment Plant			
View looking west			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received

APPENDIX 3: Discharge Monitoring Report (DMR) results

Table 1. DMR

Outfall	Limits Parameter Desc	Statistical Base Short Desc	Units	Limit	Monitoring result	Monitoring Period End Date	DMR Value Received Date	Percent Exceedance
001	Solids, total suspended	DAILY MX	mg/l	45	129.375	06/30/2019	7/10/2019	188%
001	Solids, total suspended	MO AVG	mg/l	30	129.375	06/30/2019	7/10/2019	331%
001	Solids, total suspended	DAILY MX	mg/l	45	66	10/31/2019	11/12/2019	47%
001	Solids, total suspended	MO AVG	mg/l	30	66	10/31/2019	11/12/2019	120%
001	BOD, carbonaceous [5 day, 20 C]	DAILY MX	mg/l	23	32	10/31/2019	11/12/2019	39%
001	BOD, carbonaceous [5 day, 20 C]	MO AVG	mg/l	15	32	10/31/2019	11/12/2019	113%
001	BOD, carbonaceous [5 day, 20 C]	DAILY MX	mg/l	23	58	11/30/2020	12/11/2020	152%
001	BOD, carbonaceous [5 day, 20 C]	MO AVG	mg/l	15	58	11/30/2020	12/11/2020	287%
001	BOD, carbonaceous [5 day, 20 C]	MO AVG	mg/l	15	16	03/31/2021	4/12/2021	7%
001	BOD, carbonaceous [5 day, 20 C]	DAILY MX	mg/l	23	54	09/30/2021	10/6/2021	135%
001	BOD, carbonaceous [5 day, 20 C]	MO AVG	mg/l	15	54	09/30/2021	10/6/2021	260%
001	Oil and grease [soxhlet extr.] tot.	DAILY MX	mg/l	10	12	12/31/2021	1/13/2022	20%
001	BOD, carbonaceous [5 day, 20 C]	MO AVG	mg/l	15	22	01/31/2022	2/15/2022	47%
001	BOD, carbonaceous [5 day, 20 C]	DAILY MX	mg/l	23	78	03/31/2022	4/14/2022	239%
001	BOD, carbonaceous [5 day, 20 C]	MO AVG	mg/l	15	78	03/31/2022	4/14/2022	420%
001	BOD,	MO AVG	mg/l	15	20.25	05/31/2022	6/13/2022	35%

	carbonaceous [5 day, 20 C]							
001	BOD, carbonaceous [5 day, 20 C]	DAILY MX	mg/l	23	24.78	12/31/2022	1/10/2023	8%
001	BOD, carbonaceous [5 day, 20 C]	MO AVG	mg/l	15	24.78	12/31/2022	1/10/2023	65%
001	Oil and grease [soxhlet extr.] tot.	DAILY MX	mg/l	10	23.4	02/28/2023	3/6/2023	134%
001	BOD, carbonaceous [5 day, 20 C]	MO AVG	mg/l	15	19.64	02/28/2023	3/6/2023	31%
001	BOD, carbonaceous [5 day, 20 C]	MO AVG	mg/l	15	20.69	05/31/2023	6/7/2023	38%
002	BOD, carbonaceous [5 day, 20 C]	MO AVG	mg/l	15	18.87	05/31/2019	6/10/2019	26%
002	Solids, total suspended	DAILY MX	mg/l	45	120	10/31/2019	11/12/2019	167%
002	Solids, total suspended	MO AVG	mg/l	30	120	10/31/2019	11/12/2019	300%
002	BOD, carbonaceous [5 day, 20 C]	DAILY MX	mg/l	23	140	10/31/2019	11/12/2019	509%
002	BOD, carbonaceous [5 day, 20 C]	MO AVG	mg/l	15	140	10/31/2019	11/12/2019	833%
002	BOD, carbonaceous [5 day, 20 C]	DAILY MX	mg/l	23	40	01/31/2020	2/10/2020	74%
002	BOD, carbonaceous [5 day, 20 C]	MO AVG	mg/l	15	40	01/31/2020	2/10/2020	167%
002	BOD, carbonaceous [5 day, 20 C]	DAILY MX	mg/l	23	52	01/31/2021	2/9/2021	126%
002	BOD, carbonaceous [5 day, 20 C]	MO AVG	mg/l	15	52	01/31/2021	2/9/2021	247%
002	BOD, carbonaceous [5 day, 20 C]	DAILY MX	mg/l	23	54	01/31/2022	2/15/2022	135%
002	BOD, carbonaceous [5 day, 20 C]	MO AVG	mg/l	15	54	01/31/2022	2/15/2022	260%
002	BOD,	DAILY MX	mg/l	23	28	03/31/2022	4/14/2022	22%

	carbonaceous [5 day, 20 C]							
002	BOD, carbonaceous [5 day, 20 C]	MO AVG	mg/l	15	28	03/31/2022	4/14/2022	87%
004	BOD, carbonaceous [5 day, 20 C]	MO AVG	mg/l	15	18.87	05/31/2019	6/10/2019	26%

