



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES										yr/mo/day				Inspec. Type	Inspector	Fac Type											
1	N	2	5	3	A	R	0	0	2	2	4	0	3	11	12	0	7	0	9	2	4	17	18	I	19	S	20	2
Remarks																												
0	0	1	C																									
Inspection Work Days				Facility Evaluation Rating				BI	QA	-----Reserved-----																		
67				69	70	N	71	N	72	N	73		74	75														80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Kraft Foods North America, Inc. POTW: City of Bentonville 507 SE "E" Street Permit #: AR0022403 Bentonville, AR 72712		Entry Time /Date 1105 / 09-24-07	Permit Effective Date NA
		Exit Time/Date 1145 / 09-24-07	Permit Expiration Date NA
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Glen Wells, Maintenance Lead / 479-273-5561		Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Rich Holtquist/Plant Manager / 479-273-5561, Ext 115 / 479-273-2433 507 SE "E" Street Bentonville, AR 72712		Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

N	Permit	N	Flow Measurement	N	Operations & Maintenance	N	CSO/SSO
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	Y	Pretreatment	N	Sampling
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water		Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Anhydrous ammonia refrigerant had been found to be releasing from the cooling system following a 09/22/07 report to the Fire Department from an area resident of an ammonia odor. According to Kraft Foods, ~15 lbs of the gas had been released. To alleviate the vapors, Kraft directed the escaping gas into water at two locations and released the solution to their storm water retention basin. The outfall gate was partially open and released the solution to the receiving stream. This incident has been assigned #07-60211.

During the investigation, it was found that a Bentonville POTW-issued permit violation noted during a 05/10/07 SIU inspection had not been adequately addressed.

- Evidence of bypasses to the POTW via a v-notch weir in a split basin prior to the pH adjustment basins. According to Glen Wells, Kraft Foods Maintenance Lead, Kraft was not aware that pretreatment bypasses had been occurring and, therefore, Kraft had not notified the Bentonville POTW of the bypasses.

Name(s) and Signature(s) of Inspector(s) John Fazio 	Agency/Office/Telephone/Fax Arkansas Dept. of Environmental Quality/ Fayetteville/ 479-267-0811, ext. 16	Date October 23, 2007
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date



ARKANSAS
Department of Environmental Quality

October 23, 2007

Ms. Belva Plumlee, Wastewater Utility Manager
Bentonville Wastewater Treatment Plant
1901 N.E. A Street
Bentonville, Arkansas 72712

RE: Pretreatment Bypass - Kraft Foods, 507 Southeast E. Street, Bentonville

Dear Ms. Plumlee:

On September 24, 2007, Alison West, Field Inspector, and I investigated an anhydrous ammonia release that occurred at the Kraft Foods facility on September 22, 2007. During this investigation, there was evidence that bypasses to the Bentonville Wastewater Treatment Plant (WWTP) have continued to occur through the v-notch weir located before the pretreatment pH equalization basins during periods of high discharge rates.

Process waste solids were observed on both sides of the v-notch weir that divides an effluent receiving basin located before the equalization basins. As you recall from site conditions observed during the May 10, 2007 SIU inspection, during periods of low flow, all wastewater discharges from this split basin to the pH equalization basins. However, during periods of high flow, a portion of the wastewater is directed through the weir and discharged untreated to the WWTP. When this evidence was presented to Glen Wells, Kraft Foods Maintenance Lead, he stated that Kraft Foods had not been aware of any bypasses, but concurred that the evidence confirmed that they have been occurring. This suggests that the Bentonville WWTP had not been notified of the bypasses.

The Department is requiring a written response from the City of Bentonville detailing the corrective action taken by Kraft Foods to prevent further unanticipated bypasses of their pretreatment system. These measures must be protective of the waters of the State. Please submit this response to the Water Division Enforcement Branch of this Department at the following address:

Water Division Enforcement Branch
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

The written response is due by November 13, 2007. If I can be of any assistance, please contact me at 479-267-0811, ext. 16.

Belva Plumlee
October 23, 2007
Page Two

Sincerely,

A handwritten signature in black ink, appearing to read "John Fazio". The signature is written in a cursive style with a large, stylized "J" and "F".

John Fazio
District 1 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch

ADEQ

ARKANSAS
Department of Environmental Quality

MEMORANDUM

To: Dale Washam, Inspector Supervisor, Water Division
Frank Esry, Inspector Supervisor, Water Division
Alison West, District 1 Field Inspector, Water Division
Dean VanDerhoff, Emergency Services Operations Officer

From: John Fazio, District 1 Field Inspector, Water Division

Date: October 23, 2007



Subject: Anhydrous Ammonia Release, Kraft Foods, Bentonville, Arkansas
Case #07-61102

On September 24, 2007, Alison West, Field Inspector, and I conducted an on-site investigation in response to a reported anhydrous ammonia refrigerant release at Kraft Foods. An area resident had complained to the local Fire Department of an ammonia odor on the night of September 22, 2007. The Fire Department notified Kraft Foods. Rich Holtquist, Kraft Plant Manager, then notified the ADEQ.

According to the NRC report and Glen Wells, Kraft Maintenance Lead, approximately 15-16 lbs (100 lbs is the reportable quantity) of anhydrous ammonia had been released to the atmosphere. According to a September 24, 2007, article published in NWAnews.com, two valves were found to be open on the roof and venting freely to the atmosphere. Ammonia readings were found to be 50 ppm (OSHA limits levels to 45 ppm). A hose was connected to one of the valves and directed into a bucket of water to disperse the vapors. A third valve was found open at ground level at a small silo tank with a hose running through a 65 gallon trash can. The trash can was overflowing with water, and the water was running into the storm water detention basin, however, the basin gate valve was partially open allowing the contaminated runoff to drain into the basin's receiving stream. A plant manager arrived at the scene and reported that the refrigerant system was being evacuated to allow the plant to do a \$500,000 upgrade. The ADEM responded on the scene and took air quality readings downwind from the plant, which were found to be less than 50 ppm. The highest reading was at the retention basin at 100 ppm. The ADEM closed all valves, closed the retention gate properly, and instructed plant personnel to dilute the runoff. The final air check was done and ammonia levels were found to be 0 ppm. The article goes on to say that Mike Dickson, ADEM, contacted the ADEQ, and officials there determined to allow the runoff in the creek bed to vaporize rather than be vacuumed.

Contacts: Rich Holtquist, Kraft Plant Manager – 479-273-5561
Glen Wells, Kraft Maintenance Lead – 479-273-5561

**Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet**

Location:		Kraft Foods, Bentonville						
Photographer:		John Fazio			Witness:		Alison West	
Photo #	1	Of	2		Date:	09/24/07	Time:	1117
Description:								
<p>Anhydrous ammonia/water had discharged through outfall gate to receiving stream, where ammonia was reported as having dissipated to atmosphere.</p>								
Photographer:		John Fazio			Witness:		Alison West	
Photo #	2	Of	2		Date:	09/24/07	Time:	1121
Description:								
<p>V-notch weir to POTW before pH adjustment basins. When discharges are high, some of the waste water is routed through the weir and to the Bentonville POTW prior to pretreatment. Photo documents evidence that this has occurred – process waste solids visible on both sides of weir. Discharge pipe inlet (to POTW) visible at bottom of photo. POTW not notified of bypass according to Kraft personnel.</p>								



#036493

GL

POST
NOV 09 2007
MARKED

November 9, 2007

Water Division Enforcement Branch
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

RE: Pretreatment Bypass – Kraft Foods, 507 Southeast E. Street Bentonville, AR.

On Sept. 24 John Fazio & Alison West, while investigating a reported anhydrous ammonia leak, observed evidence of a bypass on an overflow weir at Kraft Foods, Global in Bentonville. This letter is to inform you of corrective action being taken by Kraft to date.

Kraft has engaged the services of an engineer to assist in this project. It has been determined that the weir can be raised 17" without causing manholes to over flow in high flow situations. This weir will be raised with bolts and sealant for the immediate future. Engineers are continuing to work on the issue.

I am enclosing a copy of correspondence with Kraft on this continuing issue and a photo of the extended weir.

I spoke with A.J. Rorie, Kraft Business Unit Leader this morning. They are considering capping the inlet for the bypass line and securing it with a numbered security seal as they do with all the trucks leaving their facility. In an emergency situation, Should a bypass be necessary they would notify the POTW when the seal was broken. Pretreatment personnel would have the number of the seal and could check it at any time to verify compliance.

Kraft is waiting for engineering reports for other alternatives. A response with the ultimate solution will be sent to your office as soon as it becomes available.

If you have any questions regarding this issue, please call me at 479-271-3160 or you may contact Mr. Rorie at 479-273-5561 Ext. 132.

Sincerely,

Nancy Busen, Lab/Pretreatment Supervisor
City of Bentonville, WWTF
1901 N.E. "A" Street
Bentonville, AR 72712

Nancy Busen

From: Nancy Busen
Sent: Wednesday, November 07, 2007 10:48 AM
To: 'arorie@kraft.com'
Subject: Plan for discharge weir

POST
NOV 09 2007
MARKED



Good Morning A.J.

Did your engineer present a solution for the issue of the by-pass on the discharge weir?

If so, will you please share it with Mike, Belva & me?

We are required to reply to ADEQ with a solution to this problem Before November 13. The 12th is a government holiday so I will need to mail my response on this Friday November 9th.

Thanks for your attention to this issue.

Nancy Busen
City of Bentonville
Lab/Pretreatment Supervisor
1901 N.E. 'A' Street
Bentonville, AR 72712
479-271-3160
Fax: 479-271-3163

Protect Tomorrow, TODAY

Nancy Busen

From: arorie@kraft.com
Sent: Tuesday, October 30, 2007 12:22 PM
To: Nancy Busen
Cc: rholtquist@Kraft.com
Subject: RE: ADEQ request

POST
NOV 09 2007
MARKED

ADEQ suggested we cap the inlet for the bypass line. Given our flow rates, we are concerned that could create a more serious environmental issue, than the possibility of a bypass to the POTW, if the flow out is obstructed and the pit overflows. We are reluctant to modify the dam holding the effluent back from the bypass inlet because we do not want to create a situation where a higher level "floats" the manhole covers out and releases the flow to the surface. We have an Engineer scheduled in here this coming Friday, November 2nd to take measurements and from that we will develop a workable plan of which I will submit to you by next week.. We want a situation where we are always be in compliance with our permit.

Please contact me with any questions.

AJ Rorie

From: Nancy Busen [mailto:NBusen@bentonvillear.com]
Sent: Monday, October 29, 2007 12:43 PM
To: Rorie, AJ
Cc: Holtquist, Richard L.; Mike Roberts; Belva Plumlee
Subject: ADEQ request

Gentlemen,

We received a letter from ADEQ today regarding their visit to your facility on Sept. 22, 2007.

Mr. Fazio states, " During this investigation (of the ammonia complaint) there was evidence that bypasses to the Bentonville Wastewater Treatment Plant have continued to occur through the v-notch weir located before the pretreatment pH equalization Basins during periods of high discharge rates." He mentions discussion with Glen Wells, Kraft Food Maintenance Lead, stating that Kraft Foods had not been aware of any bypasses but he concurred that there was evidence that they have been occurring.

The Department is requiring written response from the City of Bentonville detailing the corrective action taken by Kraft Foods to prevent further unanticipated bypasses of your pretreatment system. We discussed raising this weir at our tour on October 2nd.

Will you please see that this project is completed as soon as possible & contact me so that I can take pictures to send with my response to Mr. Fazio before November 13th?

Official correspondence will be mailed tomorrow.

Thank you for your time & efforts,

Nancy Busen

10/30/2007

Lock for valve
Kraft Bentonville
11-9-07
Mary Baker

129011



KRAFT BENTONVILLE 17" WEIR ADDITION

11-9-07

Mervey Brown

WEIR EXTENSION

BENTONVILLE KRAFT FOODS

11/9/07

Nancy Busen

