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State of Ohio Environmental Protection Agency
Southwest District

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Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

June 4, 2008

Mr. Steve Landry
J.M. Smucker LLC – Crisco Plant
5204 Spring Grove Avenue
Cincinnati, Ohio 45217

Re: J.M. Smucker LLC – Crisco Plant CEI - OH0134155;1IH00026*BD

Dear Mr. Landry:

On May 5, 2008, Marianne Piekutowski conducted a Compliance Evaluation Inspection (CEI) at the J.M. Smucker LLC – Crisco Plant. The facility was represented by Sherry Vaughn, Jim Acres and Neil Morstadt. The purpose of the inspection was to evaluate compliance with the terms of the NPDES permit, and to prepare for the public hearing for the proposed permit modification. Please note that the report, by its format, tends to highlight negative areas.

As indicated in the attached NPDES Compliance Inspection Report, all areas rated received a Satisfactory rating. Please note that this report will also serve as the notifications for the code violations noted in this report.

Thank you for the time extended during the inspection. If you have any questions, please contact Ms. Piekutowski at this office at 937.285.6108.

Sincerely,

Martyn G. Burt
Environmental Supervisor
Division of Surface Water

Cc: Jim Acres, JM Smucker
Neil Mordstadt, JM Smucker





11



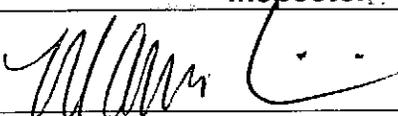
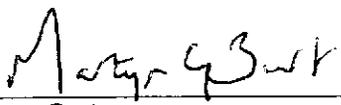
State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

| Section A: National Data System Coding | | | | | |
|--|-----------|----------------|-----------------|-----------|---------------|
| Permit # | NPDES# | Month/Day/Year | Inspection Type | Inspector | Facility Type |
| 1IH00026*BD | OH0134155 | 05/05/2007 | C | S | 2 |

| Section B: Facility Data | | |
|--|------------------------------|------------------------|
| Name and Location of Facility Inspected | Entry Time | Permit Effective Date |
| J.M. Smucker LLC – Crisco Plant 5204 Spring Grove Avenue Cincinnati, Ohio 45217 | 10:00 am | 07/01/2004 |
| | Exit Time | Permit Expiration Date |
| | 2:30 pm | 06/30/2009 |
| Name(s) and Title(s) of On-Site Representatives | Phone Number(s) | |
| Jim Acres, Plant Project Engineer Neil Morstadt, Environmental Engineer | 513.482.8240 513.482.8285 | |
| Name, Address and Title of Responsible Official | Phone Number | |
| Steve Landry, Plant Manager J.M. Smucker LLC – Crisco Plant 5204 Spring Grove Avenue Cincinnati, Ohio 45217 | 513.482.8080 | |

| Section C: Areas Evaluated During Inspection | | | | | |
|---|--------------------------|---|---------------------------|---|-------------------------|
| (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated) | | | | | |
| S | Permit | S | Flow Measurement | N | Pretreatment |
| S | Records/Reports | N | Laboratory | N | Compliance Schedule |
| S | Operations & Maintenance | S | Effluent/Receiving Waters | N | Self-Monitoring Program |
| S | Facility Site Review | N | Sludge Storage/Disposal | S | Other – Storm Water |
| N | Collection System | | | | |

| Section D: Summary of Findings (Attach additional sheets if necessary) | |
|---|--|
| See attached report. | |
| Inspector | Reviewer |
|  Marianne Piekutowski Division of Surface Water Southwest District Office |  Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office |
| 6/4/08 Date | 6/4/08 Date |

Permit # : 11H00026*BD
NPDES # : OH0134155

Sections E thru K: Complete on all inspections as appropriate
Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

Section E: Permit Verification

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee Y
- (b) Correct name and location of receiving waters..... Y
- (c) Product(s) and production rates conform with permit application (Industries)..... Y
- (d) Flows and loadings conform with NPDES permit..... Y
- (e) Treatment processes are as described in permit application... Y
- (f) New treatment process(es) added since last inspection..... Y
- (g) Notification given to State of new, different or increased discharges..... Y
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

(e) Smucker is still in the process of installing its storm water treatment system and its process waste treatment system.
(i) Smucker is in the process of building outfall 003. There is a proposed outfall (004) that is still under the permit review process.

Section E: Permit Verification

- (a) Any significant violations since the last inspection..... N
- (b) Permittee is taking actions to resolve violations..... NA
- (c) Permittee has a compliance schedule..... N
- (d) Compliance schedule contained in
- (e) Permittee is meeting compliance schedule..... NA

Comments/Status:

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator or dual feed NE
- (b) Adequate alarm system available for power or equipment failures.. NE
- (c) All treatment units in service other than backup units..... NE
- (d) Operator holds unexpired license of class required by permit..... NE
Class: I
- (f) Routine and preventative maintenance schedule/performed on time..... NE
- (g) Any major equipment breakdown since last inspection..... NE
- (h) Operation and maintenance manual provided and maintained..... NE
- (i) Any plant bypasses since last inspection..... NE
- (j) Regulatory agency notified of bypasses..... NE
On MORs and/or Spill Hotline (1-800-282-9378)
- (k) Any hydraulic and/or organic overloads since last inspection..... NE

Collection System:

- (a) Percent combined system: %
- (b) Any collection system overflows since last inspection..... NA
(CSO and/or SSO)
- (c) Regulatory agency notified of overflows (SSOs)..... NA
- (d) CSO O&M plan provided and implemented..... NA
- (e) CSOs monitored and reported in accordance with permit..... NA
- (f) Portable pumps used to relieve system..... NA
- (g) Lift station alarms provided and maintained..... NA
- (h) Are lift stations equipped with permanent standby power or equivalent..... NA
- (i) Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection..... NA
- (j) Any complaints received since last inspection of basement flooding NA
- (k) Are any portions of the sewer system at or near capacity..... NA

Comments/Status:

Treatment Works: This is in the process of being constructed. It will be evaluated once it becomes operational.

Section H: Sludge Management

- (a) Sludge management plan (SMP)
Submitted date: Approval #: Not submitted N/A
- (b) Sludge management plan current.....NA
(c) Sludge adequately disposed..... NA
(Method:)
(d) If sludge is incinerated, where is ash disposed of
(e) Is sludge disposal contracted..... NA
(Name:)
(f) Has amount of sludge generated changed significantly since
last inspection..... NA
(g) Adequate sludge storage provided at plant.....NA
(h) Land application sites monitored and inspected per SMP..... NA
(i) Records kept in accordance with State and Federal law..... NA
(j) Any complaints received in last year regarding sludge..... NA
(k) Is sludge adequately processed (digestion, pathogen control)..... NA

Comments/Status:

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary flow measuring device operated and maintained..... Y
Type of device: Ultrasonic & Parshall flume Ultrasonic & Weir Weir
Calculated from influent Other (Specify: Micromotion meter)
- (b) Calibration frequency adequate Y
(Date of last calibration: May 2007, done annually; Weir done monthly)
(c) Secondary instruments operated and maintained.....NA
(d) Flow measurement equipment adequate to handle full range
of flows..... Y
(e) Actual flow discharged is measured..... Y
(f) Flow measuring equipment inspection frequency
 Daily Weekly monthly Other Checked visually each shift. Weir calibrated monthly

Comments/Status:

(a) A weir is used for non-contact cooling water overflow.

Section I: Self-Monitoring Program (con't)

Sampling:

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... Y
- (c) Permittee uses required sampling method..... Y
- (d) Sample collection procedures are adequate..... Y
 - (i) Samples refrigerated during compositing..... NA
 - (ii) Proper preservation techniques used..... NA
 - (iii) Containers and sample holding times prior to analysis conform with 40 CFR 136.3..... NA
- (e) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e, continuous monitoring instrumentation, calibration and maintenance records)..... Y

- (f) Adequate records maintained of sampling date, time, location, etc.. Y

Laboratory:

General

- (a) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (b) If alternate analytical procedures are used, proper approval has been obtained..... NA
- (c) Analyses being performed more frequently than required by permit. Y
- (d) If (c) is yes, are results in permittee's self-monitoring report..... Y
- (e) Commercial laboratory used..... N
Parameters analyzed by commercial lab:

Lab name:

Quality Control/Quality Assurance

- (f) Quality assurance manual provided and maintained..... Y
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y
- (h) Adequate records maintained..... Y
- (i) Results of latest USEPA quality assurance performance sampling program: Satisfactory Marginal Unsatisfactory

Date: Currently do not do.

Comments/Status:

Sampling: (d) The facility is currently ~~not~~ doing pH and temperature since the discharge is currently non-contact cooling water.
(f) Maintained electronically.
Laboratory: (e) Will be evaluating this when the storm water/process water projects come on-line.

Section J: Effluent/Receiving Water Observations

| Outfall Number | Oil sheen | Grease | Turbidity | Visible Foam | Visible Floating Solids | Color | Other |
|----------------|-----------|--------|-----------|--------------|-------------------------|-------|-------|
| 002 | No | No | No | No | No | No | No |
| | | | | | | | |
| | | | | | | | |
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Comments/Status:

Outfalls 003 and 004 have been installed, but the discharges are not tied into the lines yet.

Section K: Multimedia Observations

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

If any of the above are observed, ask the following questions:

- (1) What is the cause of the condition?
- (2) Is the observed condition or source a waste product?
- (3) Where is the suspected contaminant normally disposed?
- (4) Is this disposal permitted?
- (5) How long has the condition existed and when did it begin?

Comments/Status:

The facility was clean and well-maintained. There were no housekeeping issues noted at the time of the inspection.

Permit # : 1IH00026*BD
NPDES # : OH0134155



JM SMUCKER LLC – CRISCO PLANT
NPDES COMPLIANCE EVALUATION INSPECTION
DATES OF INSPECTION: May 5, 2008

ITEMS OF DISCUSSION FOR INSPECTION:

The status of the proposed NPDES modification and permit to install were discussed. The NPDES permit outfalls were also GPSed at that time since Outfalls 003 and 004 are in place. The two lines are approximately three feet apart, and the GPS location was taken between the two outfalls.

COMPLIANCE EVALUATION:

Compliance was evaluated from the May 2007 through April 2008. There were six code violations noted during that time period. The "AB" code was used because data was lost when there was a facility-wide power outage. The Duke Energy Boilerhouse that supplies power for the campus went down. The computer system and server crashed when the power went out, and the data was lost. Two days worth of information (October 6-7, 2007) was lost.

OBSERVATIONS:

JM Smucker LLC – Crisco Plant manufactures shortenings and oils. Approximately 80% of the raw materials come into the site in rail cars. The raw materials are crude oils that come from crushed seeds. The crude oils are then refined, bleached and hardened on-site. A caustic refining process is used. One of the major contaminants in the canola oil is chlorophyll.

In the refining process, the contaminants are mainly lipid-soluble. Phosphoric acid is added to solublize the liquid, and it is then neutralized with lye. This will react with the free fatty acids to help clean the product. Soft water is then added. The material is then centrifuged. The heavy (water) portion, or fouts, are then sold as a by-product. The canola oil will go through another wash step to remove 'soapy' contaminants. There is a new project where Smucker is looking at reducing this wastestream.

Bleaching earth is then used to remove metal, colors and oxidizers from the oils. After this step, the refined oils can take one of two paths. It can become either shortening or oil. In the shortening process, there is a hydrogenation step that is done with a catalyst. This allows the process to occur at a lower temperature so that it is still edible. The product is then packaged and shipped off-site for sale. Products are made in sizes for the home consumer to commercial customers.

Currently, all of the process wastewater associated with this site is discharged to MSD of Greater Cincinnati. The storm water from the South Yard area has been approved to be

June 4, 2008

Page 2

treated and discharged under the facility's NPDES permit. At the time of the inspection, construction was continuing on the building and equipment for the storm water and process water treatment system, and the pipes for the discharges have been installed. The permit modification for the process wastewater is currently under adjudication. The existing discharge is non-contact cooling water. The sanitary flow from the facility also discharges to MSD of Greater Cincinnati. This will remain in MSD's collection system.

The proposed storm water system will consist of gross solids filtration, neutralization, and oil removal. This will take contaminated storm water from the South Yard where rail cars are loaded and unloaded as well as the aboveground storage tanks, and allow it to be treated for discharge directly to the Mill Creek. There are two different treatment scenarios in place for the removal of the oils. There will be a belt skimmer on the modified catch basin to allow for all free oils to be removed, and provisions have been made for the installation of an organoclay media filter.

The belt skimmer in the South Yard was down on the day of the inspection. All of the storm water flow was going to MSD.

The proposed process wastewater system is more elaborate. This would consist of gross oil removal, pH adjustment, equalization, heat exchangers, gross solids removal, diffused air flotation with polymer addition, organoclay media filters (if needed), phosphorus removal, and membrane bioreactors. This system has been proposed, but has not yet been approved. Both the proposed storm water and process wastewater system may have an interconnection to MSD to allow for discharge to the sanitary sewer in the event of a process upset or problem with the treatment works.

The facility is looking at using a non-contact cooling water additive to reduce the algae in the discharge from the reservoir. A dechlorination system would be added to ensure that chlorine is not discharged.

The facility has a general permit for some of its non-contact cooling water. Outfall 001 is covered in this permit. This also has coverage under the general industrial storm water permit. The storm drains in this area are painted green. When there is too much water or an upset condition in the reservoir, it will discharge from Outfall 001 under the general permit. Usually the non-contact cooling water is discharged from Outfall 002. The same pH probe is used for 001 and 002. The probe is located in the middle of the reservoir. This reservoir is also used as the fire water reservoir for the campus.