



State of Ohio Environmental Protection Agency
Southwest District

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

June 9, 2009

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

Re: J.M. Smucker LLC – Crisco Plant – Pre-Permit/CEI - OH0134155;1IH00026*CD

Dear Mr. Day:

On May 18, 2009, Marianne Piekutowski conducted a Pre-Permit and Compliance Evaluation Inspection (CEI) at the J.M. Smucker LLC – Crisco Plant. The facility was represented by Sherry Vaughn and Neil Morstadt. The purpose of the inspection was to evaluate compliance with the terms of the NPDES permit, and to update the information in the facility's NPDES renewal application. 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: Neil Mordstadt, JM Smucker





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State of Ohio Environmental Protection Agency
Southwest District Office

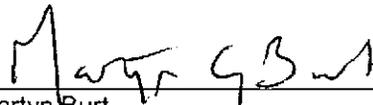
NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1IH00026*CD	OH0134155	05/18/2009	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	8:00 am	07/01/2004
	Exit Time	Permit Expiration Date
	10:00 am	06/30/2009
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Neil Morstadt, Environmental Engineer Sherry Vaughn, HIS Leader	513.482.8285 513.482.8035	
Name, Address and Title of Responsible Official	Phone Number	
Randy Day, 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
	
Date: 6/9/09	Date: 6/9/09
Marianne Piekutowski Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

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..... N
- (g) Notification given to State of new, different or increased discharges..... N
- (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. The start-up to Mill Creek is expected in mid-July 2009.

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..... Y
- (d) Compliance schedule contained in
- (e) Permittee is meeting compliance schedule..... Y

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. The discharge to Mill Creek should begin in mid-July 2009.

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:

- The sludge will be taken to Rumpke initially. After the facility is operational, Smucker will be exploring other options for solids disposal.

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 001
Calculated from influent Other (Specify: Micromotion meter - 002)
- (b) Calibration frequency adequate Y
(Date of last calibration: May 2008, 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 on doing pH and temperature since the discharge is currently non-contact cooling water.
(f) Maintained electronically.
Laboratory: [c] Temperature and pH done continuously.
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
003	No Flow						
004	No Flow						

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*CD
NPDES #: OH0134155

**JM SMUCKER LLC – CRISCO PLANT
NPDES COMPLIANCE EVALUATION INSPECTION
DATES OF INSPECTION: May 18, 2009**

ITEMS OF DISCUSSION FOR INSPECTION:

The NPDES renewal application was submitted as required. The information in the NPDES permit application was verified. The eDMRs were reviewed for compliance. An update on the status of the process wastewater treatment system was also discussed.

COMPLIANCE EVALUATION:

Compliance was evaluated from the May 2008 through April 2009. There were two code violations noted during that time period. On July 20 and 21, 2008, the "AB" code was used because temperature data was not captured by the computer system because it crashed. The pH data was taken by hand for the day.

There was a preliminary compliance report sent out in December 2008 for Total Residual Chlorine. This was addressed and did not result in any violations.

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 foots, are then sold as a by-product. The canola oil will go through another wash step to remove 'soapy' contaminants

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 treated and discharged under the facility's NPDES permit. The construction has been completed on both of the treatment systems. The wastewater is currently being discharged

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to MSD. The existing NPDES 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 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 facility is investigating the idea of treating the storm water through the process wastewater treatment system since capacity is available.

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. The facility will begin seeding the plant around June 16 during plant shutdown. The seed is from Miller Brewery. GE Xenon will be providing a seeding schedule for the startup of the system. Initially, the discharge will go to MSD of Greater Cincinnati. In mid-July, the facility is hoping to begin discharging to Mill Creek under its NPDES permit. Both the storm water and process wastewater system 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. To date, the chlor/dechlor system has the taps installed, but nothing else has been installed. The source for the water in the reservoir has algae, and discussions are occurring with regards to this.

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. The facility also has a general permit for the hydrostatic testing of both old and new tanks. There have been discharges associated with this permit.

