



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

June 6, 2011

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

Re: J.M. Smucker LLC – Crisco Plant – CEI - OH0134155;1IH00026*DD
J.M. Smucker LLC – Crisco Plant – RI - OHH000001;1GH00003*AG
J.M. Smucker LLC – Crisco Plant – RI - OHGN00055;1GN00031*DG

Dear Mr. Kilgore:

On May 18, 2011, I conducted a Compliance Evaluation Inspection (CEI) at the J.M. Smucker LLC – Crisco Plant. The facility was represented by Karen Teter and Jim Acres. The purpose of the inspection was to evaluate compliance with the terms of the NPDES permit. 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.

Thank you for the time extended during the inspection. If you have any questions, feel free to contact me at 937.285.6108.

Sincerely,

Marianne Piekutowski
Environmental Specialist 2
Division of Surface Water

Enclosures

Cc: Karen Teter, JM Smucker
Jim Acres, JM Smucker



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
1GH00003*AG	OHGH00004	05/18/2011	R	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
JM Smucker LLC – Crisco Facility 5204 Spring Grove Avenue Cincinnati, Ohio 45217	10:00 am	11/19/2007
	Exit Time	Permit Expiration Date
	1:50 pm	10/31/2012
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Karen Teter, Manager/HSE & Sustainability Leader Jim Acres, Plant Project Engineer	513.482.8263 513.482.8240	
Name, Address and Title of Responsible Official	Phone Number	
John Kilgore, Plant Manager JM Smucker LLC – Crisco Facility 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	N	Flow Measurement	N	Pretreatment
N	Records/Reports	N	Laboratory	N	Compliance Schedule
N	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
N	Facility Site Review	N	Sludge Storage/Disposal	N	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)
- There were no discharges under this permit from May 1, 2010 through May 18, 2011.

Inspector	Reviewer
 Marianne Piekutowski Division of Surface Water Southwest District Office Date: 6/6/11	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office Date: 6/6/11

5/11/10 -

5/18/11



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
12100026*DD	014013HSS	05/18/2011	C	S	12

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
JMSmucker LLC - Crnt Crisco Pkt 5204 Spring Grove Ave. Cincinnati, OH 45217	1000 am	1/1/10
	Exit Time	Permit Expiration Date
	1501 pm	10/31/13
Name(s) and Title(s) of On-Site Representatives		Phone Number(s)
Kerentector, Mgr HSE Sustainability Leader		513.482.8263
Name, Address and Title of Responsible Official		Phone Number
John Kilgore, Plant Mgr JMSmucker LLC - Crisco Pkt. 5204 Spring Grove Ave Cinti, OH 45217		513.482.8080

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

Section D: Summary of Findings (Attach additional sheets if necessary)			
Inspector		Reviewer	
Joe Schmo		Martyn Burt	
Date		Date	
Division of Surface Water Southwest District Office		Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office	



State of Ohio Environmental Protection Agency
Southwest District Office

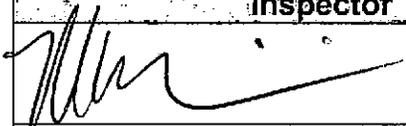
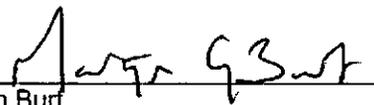
NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1GN00031*DG	OHGN00055	05/18/2011	R	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
JM Smucker LLC – Crisco Facility 5204 Spring Grove Avenue Cincinnati, Ohio 45217	10:00 am	06/01/2011
	Exit Time	Permit Expiration Date
	1:50 pm	05/31/2016
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Karen Teter, Manager/HSE & Sustainability Leader Jim Acres, Plant Project Engineer	513.482.8263 513.482.8240	
Name, Address and Title of Responsible Official	Phone Number	
John Kilgore, Plant Manager JM Smucker LLC – Crisco Facility 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	N	Flow Measurement	N	Pretreatment
N	Records/Reports	N	Laboratory	N	Compliance Schedule
N	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
N	Facility Site Review	N	Sludge Storage/Disposal	N	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)
- There were no violations for this outfall from May 1, 2010 through May 18, 2011. This is an auxiliary non-contact cooling water outfall.

Inspector	Reviewer
 Marianne Piekutowski Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
6/6/11 Date	6/6/11 Date



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
11H00026*DD	OH0134155	05/18/2011	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
J.M. Smucker Co. LLC – Crisco Plant 5204 Spring Grove Avenue Cincinnati, Ohio 45217	10:00 am	01/01/2010
	Exit Time	Permit Expiration Date
	1:50 pm	10/31/2013
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Karen Teter, Manager/HSE & Sustainability Leader Jim Acres, Plant Project Engineer	513.482.8263 513.482.8240	
Name, Address and Title of Responsible Official	Phone Number	
John Kilgore, Plant Manager J.M. Smucker Co. LLC – Crisco Plant 5204 Spring Grove Avenue	513.482.8080	

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

Section D: Summary of Findings (Attach additional sheets if necessary)
See attached report.

Inspector	Reviewer
Date: 6/6/11	Date: 6/6/11
Mariahne 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) Do Categorical Standards apply?...If yes, list applicable standards.. N
- (d) Product(s) and production rates conform with permit application (Industries)..... NA
- (e) Flows and loadings conform with NPDES permit..... Y
- (f) Treatment processes are as described in permit application... Y
- (g) All discharges are permitted..... Y
- (h) Number and location of discharge points are as described in permit..... Y
- (i) Storm water discharges properly permitted..... Y

Comments/Status:

d) All of the process wastewater and treated storm water is still being discharged to MSD. The non-contact cooling water is currently the only flow being discharged to Mill Creek.
i) The facility has coverage under the general industrial stormwater permit for non-contaminated stormwater.

Section F: Compliance

- (a) Any significant violations since the last inspection..... N
- (b) Appropriate Non-compliance notification of violations..... NA
- (c) Permittee is taking actions to resolve violations..... NA
- (d) Permittee has a compliance schedule..... N
- (e) Compliance schedule contained in...N/A
- (f) Permittee is in compliance with schedule..... NA
- (g) Has biomonitoring shown toxicity in discharge since last inspection NA

Comments/Status:

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator or dual feed N
 - i. What does the back-up power source operate.....

There are battery backups on all control equipment through an analog system.
 - ii. How often is the generator tested under load.....

NA

- (b) Which components have an alarm system available for power or equipment failures.....

Both of the main control processors have redundant alarms. There is a text page and an analog phone dialer to send out pages for outages.

- (c) All treatment units in service other than backup units..... NA
- (d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc.).....

The facility has at software-based TBM (Time-based maintenance). There also CILs (clean, inspect and lubricate) daily and weekly.
- (e) Any major equipment breakdown since last inspection..... N
- (f) Operation and maintenance manual provided and maintained..... Y
- (g) Any plant bypasses since last inspection..... Y
- (h) Any plant upsets since last inspection..... Y

Comments/Status:

c) Wastewater is being treated, but being discharged to MSD until facility has determined it is in compliance with its NPDES permit. There was a tank recall for the MBRs due to welds not being clean prior to epoxy coating. The MBR units were not damaged. The facility is hoping to begin discharging in the next two to three months.

e) The fluid cooler was down.

The analog lines are used for waste treat. This was done so they would not be dependent upon power in the event of a power outage. Notifications can be made to personnel.

Section H: Sludge Management

- (a) Method of Sludge Disposal... Land Application
 Haul to Another NPDES Permittee
 Haul to a Mixed Solid Waste Landfill

*if one of the selected methods is land application, complete applicable charts.
Class A - Exception Quality Sewage Sludge (monitoring station 584)

Pathogen Reduction Alternative	84370 Vector Attraction Reduction Options							
	Option 1 -38% Volatile Solids Reduction	Option 2 -Anaerobic Bench Scale Analysis	Option 3 - Aerobic Bench Scale Analysis	Option 4 - Specific Oxygen Uptake Rate	Option 5 - Aerobic Time and Temperature	Option 6 - Alkali Addition	Option 7 - >75% Percent Solids without Unstabilized Solids	Option 8 - >75% Percent Solids with Unstabilized Solids
Alternative 1 - Time and Temperature Regime (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - High pH and High Temperature (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 3 - Other Processes (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 4 - Unknown Processes (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Composting (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Heat Drying (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Heat Treatment (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Thermophilic Aerobic Digestion (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Beta Ray Irradiation (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Gamma ray Irradiation (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Pasteurization (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 6 - Approved Equivalent Process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Class B Sewage Sludge (monitoring station 581)

Pathogen Reduction Alternative	84370 Vector Attraction Reduction Options									
	Option 1 -38% Volatile Solids Reduction	Option 2 -Anaerobic Bench Scale Analysis	Option 3 - Aerobic Bench Scale Analysis	Option 4 - Specific Oxygen Uptake Rate	Option 5 - Aerobic Time and Temperature	Option 6 - Alkali Addition	Option 7 - >75% Percent Solids without Unstabilized	Option 8 - >75% Percent Solids with Unstabilized	Option 9 - Land Injection	Option 10 - Immediate Incorporation
Alternative 1 - Geometric Mean of Seven Fecal Samples (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Aerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Air Drying (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Anaerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Composting (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Lime Treatment (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 3 - Approved Equivalent Process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- (a) Has amount of sludge generated changed significantly since the last inspection..... NA
- (b) How much sludge storage is provided at the plant.....
- (c) Records kept in accordance with State and Federal law (5 years according to OAC 3745-40-06)..... NA
- (d) Any complaints received in last year regarding sludge..... NA
- (e) 5/8" screen at headworks for facilities that land apply sludge..... NA
- (f) Are sludge application sites inspected to verify compliance with NPDES permit..... NA
- (g) Is a contractor used for sludge disposal..... NA
 If so, what is the name of the contractor.....

Comments/Status:

CSI transports the sludge to Rumpke Sanitary Landfill. The DAF bottoms go to the filter press and then to Rumpke. Oil skimming go to North Bend Oil for biodiesel.

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary/Secondary flow measuring devices operated and maintained..... Y
Type of device (e.g. weir with ultrasonic level sensor):
002 has a weir & coreolus meter, 003 is estimates based on pump and run times, and 004 has a magmeter.
- (b) Calibration frequency adequate Y
(Date of last calibration: Weir done monthly)
- (c) 24-hour recording instruments operated and maintained.....Y
- (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

Comments/Status:

There is a backup collector for the data.

The flows are recorded on each shift for the non-contact cooling waters currently. When other discharges begin, they will be checked and maintained according to manufacturer's specifications. Outfall 002 has an annual third party calibration.

Section I: Self-Monitoring Program (cont)

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
(see GLC page)
- (d) 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

Comments/Status:

Currently, outfall 003 and 004 are not discharging. Only discharge is from 002 which is the non-contact cooling water.

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

Laboratory:

General

- (a) Does the Quality Assurance Manual contain written Standard Operating Procedures (SOP's) for all analysis performed onsite..... N
- (b) Do SOP's include the following if applicable..... NA
 - Title
 - Scope and Application
 - Summary
 - Sample Handling and Preservation
 - Interferences
 - Apparatus and Materials
 - Reagents
 - Procedure
 - Calculations
 - Quality Control
 - Maintenance
 - Corrective Action
 - Reference (Parent Method)

Note: Standard Methods 1020A establishes that "Quality assurance (QA) is the definitive program for laboratory operation that specifies the measure required to produce defensible data of known precision and accuracy. Standard operating procedures are to be used in the laboratory in sufficient detail that a competent analyst unfamiliar with the method can conduct a reliable review and/or obtain acceptable results." SOPs should be developed for each analytical procedure.

- (c) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (d) If alternate analytical procedures are used, proper approval has been obtained..... N
- (e) Analyses being performed more frequently than required by permit. N
- (f) If (e) is yes, are results in permittee's self-monitoring report..... NA
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y (see score from GLC page)
- (h) Commercial laboratory used..... Y
Parameters analyzed by commercial lab: BOD, TKN, Nitrite-Nitrate, P, TSS, Ortho P, Oil & Grease, COD.

Lab name: Belmont Laboratories

Discharge Monitoring Report Quality Assurance (DMRQA)

- (a) Participation in latest USEPA quality assurance performance sampling..... Y
Date: 2/28/2010
- (b) Were any parameters "Unsatisfactory"..... N
- (c) Reasons for "Unsatisfactory" parameters.....

NA

Comments/Status:

The facility had a copy of Belmont's DMRQA report. All passed. There is a weekly cleaning and verification for monitoring equipment and a monthly calibration.

Section J: Effluent/Receiving Water Observations

Outfall # 002

Outfall Description: Final outfall from the cooling water reservoir prior to discharge to Mill Creek. (The outfall for the non-contact cooling water covered under the general non-contact cooling water general permit also discharges in this pipe.)

Receiving Stream: Mill Creek

Receiving Stream Description: Discharge into the channelized portion of Mill Creek. The water was clear and free of solids and color.

Outfall # 003

Outfall Description: Final outfall from storm water treatment system. It is a PVC pipe into the Mill Creek.

Receiving Stream: Mill Creek

Receiving Stream Description: Discharge into the channelized portion of Mill Creek. The facility has not begun to use this outfall at the current time. Planning on beginning discharge in July/August 2011.

Outfall # 004

Outfall Description: Final outfall from process wastewater treatment system. It is a PVC pipe into the Mill Creek.

Receiving Stream: Mill Creek

Receiving Stream Description: Discharge into the channelized portion of Mill Creek. The facility has not begun to use this outfall at the current time. Planning on beginning discharge in June/July 2011.

Comments/Status:

Outfall signage is up on three outfalls in individual NPDES permit. Recommended putting up signage for outfall 001 under the non-contact cooling water general permit.

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

Permit # : 11H00026*DD
NPDES #: OH0134155

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. The storm drains on-site had been repainted a bright green to denote they discharge to Mill Creek. The process wastewater treatment system was operational, but is discharging to MSD. The facility is still in the process of debugging and optimizing the treatment units.

Permit # : 1IH00026*DD
NPDES #: OH0134155

General Lab Criteria

Criteria	Standard Methods Requirement	Acceptable?		Rating
Balance		Acceptable?		NR
• Standard Weights	• Either NIST Class s or ASTM/ANSI Class 1 weights ^{1,2}	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Calibration Frequency / Documentation	• Calibration verification required at least once each day the balance is used. ³	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Cleanliness, air movement, vibration	• Cleanliness of balance is a must and air movement and vibration needs to be kept to a minimum ¹	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Other	• Service and recalibrate annually (manufacturer representative or comparable) ¹	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Must be able to measure to 0.1 grams ⁴	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Instrument manual available	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Log book maintained ²	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

Comments:

Criteria	Standard Methods Requirement	Acceptable?		Rating
Drying Oven (Suspended Solids)		Acceptable?		NR
• Temperature Recordkeeping	• Temperature recorded with each use ⁴	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Log book maintained ²	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Calibration Frequency / Documentation	• Thermometer calibrated annually with NIST traceable thermometer ^{1,2} . Correction factor posted on thermometer / equipment ¹	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Other	• Thermometer temperature accurate to 0.5° Celsius ⁵	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Acceptable temperature range is 103° – 105° C ⁴	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Instrument manual available	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

Comments:

● General Lab Criteria ●

Criteria	Standard Methods Requirement	Acceptable?		Rating
pH Meter		Acceptable?		
• Calibration Frequency / Documentation	• Calibration verification required for testing over long period of time (e.g. 12 hrs.), or after a large number of samples (every 10 samples) ³	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	NR
	• Logbook maintained ²	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
• Minimum of 2 point calibration	• Calibration per manufacturer specification and calibration buffers must bracket anticipated result ⁷	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
• Slope Documentation / Acceptability	• Slope acceptable range indicated on benchsheet ²	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
• Buffer Expiration Date	• Buffers must not be expired	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Other	• Instrument manual available	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Teflon covered magnetic stirrer or equivalent for mixing ⁸	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

Comments: *The facility has a third party calibration once a month. There is an internal calibration done once a week.*

- *Did not have a written SOP for pH. Not sure if there is an instrument manual available. This may be available electronically at the facility.*
- *Need verify buffer solutions are not expired.*

Criteria	Standard Methods Requirement	Acceptable?		Rating
Dissolved Oxygen Meter		Acceptable?		
• Calibration Method	• Air or known DO calibration method ¹⁰	<input type="checkbox"/> Yes	<input type="checkbox"/> No	NR
	• Calibration per manufacturer specification ¹⁰	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Calibration Frequency / Documentation	• Logbook maintained ²	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Calibration verification required at least once each day the meter is used. ³	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Other	• Small to no bubble present under membrane (must be smaller than the lead in number 2 pencil) ¹¹	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Instrument manual available	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

Comments: *At the current time, this is not being done because there is no discharge. It will be done in-house when the facility begins discharging.*

General Lab Criteria

Criteria	Standard Methods Requirement	Acceptable?		Rating
Incubator, (CBOD, E-Coli)				
<ul style="list-style-type: none"> • Temperature Recordkeeping 	<ul style="list-style-type: none"> • Temperature checked / recorded twice daily for each shelf in use¹ (E-Coli) 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	NR
	<ul style="list-style-type: none"> • Temperature checked / recorded daily² (CBOD) 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	<ul style="list-style-type: none"> • Acceptable temperature range (CBOD) is 20° C ±1.0^{o 12} 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	<ul style="list-style-type: none"> • Acceptable temperature range (E-Coli) is 35° C ±0.5^{o 22} 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	<ul style="list-style-type: none"> • Logbook maintained² 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<ul style="list-style-type: none"> • Temperature Calibration / Documentation 	<ul style="list-style-type: none"> • Thermometer calibrated annually with NIST traceable thermometer^{1, 2} 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	<ul style="list-style-type: none"> • Temperature correction information posted on incubator¹ 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<ul style="list-style-type: none"> • E-Coli can use multiple tubes (five 20 ml or ten 10 ml), or mfg's multi-well tray 	<ul style="list-style-type: none"> • E-coli Ultraviolet lamp (365 nm wave length, 6 W bulb)²³ 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	<ul style="list-style-type: none"> • Other 	<ul style="list-style-type: none"> • Instrument manual available 	<input type="checkbox"/> Yes	
<ul style="list-style-type: none"> • Temperature Log (thermometer accurate to 0.5 Celsius).¹ 		<input type="checkbox"/> Yes	<input type="checkbox"/> No	

Comments :

Criteria	Standard Methods Requirement	Acceptable?		Rating
Refrigerator				
<ul style="list-style-type: none"> • Temperature Recordkeeping 	<ul style="list-style-type: none"> • Temperature Log (thermometer accurate to 0.5 Celsius).⁵ 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	NR
<ul style="list-style-type: none"> • Temperature Calibration / Documentation 	<ul style="list-style-type: none"> • Thermometer calibrated annually with NIST traceable thermometer^{1, 2} 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
<ul style="list-style-type: none"> • Other 	<ul style="list-style-type: none"> • Thermometer held in water bath.¹ 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
	<ul style="list-style-type: none"> • Refrigerator temperature ≤6° Celsius.¹³ 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
	<ul style="list-style-type: none"> • Do not store volatile solvents, food, or beverages.¹⁴ 	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

Comments: *The autosampler has a refrigerator. Once samples are collected, they are placed in a refrigerator in the control room. Need to have a thermometer accurate to 0.5 degrees C and NIST traceable. The thermometer should be kept in a water bath at less than or equal to 6 degrees C. A logbook and SOP should be developed for this.*

General Lab Criteria

Criteria	Standard Methods Requirement	Acceptable?		Rating
Chlorine Meter		Acceptable?		
• Calibration Frequency / Documentation	• pH / millivolt meter read to 0.1 mV ¹⁵	<input type="checkbox"/> Yes	<input type="checkbox"/> No	NR
	• Calibration verification required for testing over long period of time (e.g. 12 hrs.), or after a large number of samples (every 10 samples) ³	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Calibration Method	• Calibration using three iodate solutions 0.2, 1.0, 5.0 milliliters or calibration per manufacturer specification ¹⁶	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Standards used for calibration not expired	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Slope Documentation / Acceptability	• Calibration curve (acceptable slope)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Other	• Electrode free of deposits and foreign material	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Log book being maintained. ²	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Instrument manual available	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<p>Comments: <i>The facility is not using chlorine for its non-contact cooling water reservoir. The facility will be sampling for this parameter after outfall 004 begins discharging and it is cleaning the membranes.</i></p>				
Criteria	Standard Methods Requirement	Acceptable?		Rating
Ammonia Meter		Acceptable?		
• Calibration Frequency / Documentation	• Calibration verification required for testing over long period of time (e.g. 12 hrs.), or after a large number of samples (every 10 samples) ³	<input type="checkbox"/> Yes	<input type="checkbox"/> No	NR
	• Log book being maintained ²	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Slope acceptability	• Verify calibration slope is acceptable (per mfg. spec.).	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Calibration Method	• Standards used for calibration (3 ammonia solutions of 10 mg/l, 1 mg/l, and 0.1 mg/l) or per mfg. spec. ¹⁷	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Standards used for calibration not expired	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Other	• Electrode free of deposits and foreign material	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Teflon covered magnetic stirrer or equivalent for mixing ¹⁸	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Instrument manual available	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<p>Comments: :</p>				

General Lab Criteria

Criteria	Standard Methods Requirement	Acceptable?		Rating
Sample Collection/Handling		Acceptable?		
• Sample Labeling	• Samples container labeled (description, date, time, preservative added, initialed). ¹⁹	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	NR
• Chain of Custody	• Chain of custody (description, date, time, signature). ¹⁹	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
• Other	• Composite samples refrigerated during sample collection ¹⁴	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Equipment blanks utilized ¹⁴	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
	• SOP for cleaning of sampling equipment	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
	• Logbook being maintained ²	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
<p>Comments: <i>The facility uses Belmont Laboratories. The facility should develop SOPs for its sample collection and checking of the sampling equipment. A logbook should be maintained.</i></p>				
Criteria	Standard Methods Requirement	Acceptable?		Rating
Desiccator		Acceptable?		
• General criteria	• Properly working seals.	<input type="checkbox"/> Yes	<input type="checkbox"/> No	NR
	• Desiccant fresh (blue color)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Documentation	• Log book being maintained ²	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<p>Comments:</p>				
Criteria	Standard Methods Requirement	Acceptable?		Rating
Bench sheets		Acceptable?		
• General criteria	• Date(s) ²	<input type="checkbox"/> Yes	<input type="checkbox"/> No	NR
	• Analyst initials ²	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Blue or black ink pen ²	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Calibration information ²	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Equations, calculations, units for all measurements, notations, and results present ²	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Corrections, single line through, initialed and dated ²	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<p>Comments:</p>				

● General Lab Criteria ●

Criteria	Standard Methods Requirement	Acceptable?		Rating
Hot Water Bath (Fecal Coliform/E. Coli)				
• Temperature Recordkeeping	• Temperature Log (thermometer accurate to 0.2° C) ²¹	<input type="checkbox"/> Yes	<input type="checkbox"/> No	NR
	• Incubator temperature 44.5° C ± 0.2° ^{21/24}			
• Temperature Calibration / Documentation	• Thermometer calibrated annually with NIST traceable thermometer ^{1,2}	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Log book being maintained ²	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Water Level	• Thermometer total immersion or partial (line on thermometer to ID immersion depth) ^{1,5}	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

Comments:

Criteria	Standard Methods Requirement	Acceptable?		Rating
Autoclaves/Steam Sterilizers				
• All apparatus utilized is adequately sterilized before use	• Sterilizing temperature 121° C ²⁵	<input type="checkbox"/> Yes	<input type="checkbox"/> No	NR
	• 10 to 30 minutes time based on material being sterilized ²⁶	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Documentation	• Verify the autoclave temperature weekly by using a maximum registering thermometer (MRT) to confirm that 121°C has been reached as measured in the exhaust. ¹	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Date, contents, sterilization time and temperature, total time in autoclave, and analyst's initials should be recorded each time the autoclave is used ¹	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Temperature Calibration / Documentation	• Thermometer calibrated annually with NIST traceable thermometer ^{1,2}	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Log book being maintained ²	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Performance Checks	• Test monthly for efficacy using a biological such as commercially available <i>Geobacillus stearothermophilus</i> in spore strips, suspensions, or capsules ¹	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

Comments:

General Lab Criteria

Criteria	Standard Methods Requirement	Acceptable?	Rating
Final Effluent Temperature Monitoring		Acceptable?	
• General Criteria	• Thermometer calibrated annually with NIST traceable thermometer ^{1,2}	<input type="checkbox"/> Yes <input type="checkbox"/> No	NR
	• Thermometer accurate to 0.1° Celsius ⁵	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Log book being maintained ²	<input type="checkbox"/> Yes <input type="checkbox"/> No	
<p>Comments: <i>The facility uses a hot box at a known temperature for the thermowell. The facility should develop an SOP for checking the calibration and to ensure it is accurate to 0.1 degrees Celsius.</i></p>			
Number of Criteria Rated:		Acceptable	0
		Marginal	0
		Unacceptable	0
		Total Number of Areas Rated	0
<p>Acceptable Ratings – No action required (recommend SOP's written or updated, perform DMRQA's for all onsite analysis, recommend voluntary lab analyst certification, written response not required).</p>			
<p>Marginal Ratings – Improvements required, written response required (recommend SOP's be written or updated, recommend they perform DMRQA's for all onsite analysis, recommend voluntary lab analyst certification, require deficiencies to be addressed in written response).</p>			
<p>Unsatisfactory Rating - Improvements required, written response required, NOV issued (recommend SOP's be written or updated, recommend they perform DMRQA's for all onsite analysis, recommend voluntary lab analyst certification, require deficiencies to be addressed in written response to NOV).</p>			
<p>Consider recommending PAI Audit from DES when:</p>		<p>>60% of ratings are Marginal >45% of ratings are a combination of Marginal or Unacceptable >30% of ratings are Unacceptable</p>	

Notation of Referenced Method

- | | |
|----------------------------|------------------------------|
| 1 Method 9020-B, Item 3 | 14 Method 1060A, Item 1 |
| 2 Method 1020-A, Item 1 | 15 Method 4500-CI I, Item 2 |
| 3 Method 1020-B, Item 10 | 16 Method 4500-CI I, Item 4 |
| 4 Method 2540-B, Item 2 | 17 Method 4500-NH3 D, Item 4 |
| 5 Method 2550-B, Item 1 | 18 Method 4500-NH3 D, Item 2 |
| 6 Method 1020-A, Item 1 | 19 Method 1060-B, Item 2 |
| 7 Method 4500-H B, Item 4 | 20 Method 1060-B, Item 1 |
| 8 Method 4500-H B, Item 2 | 21 Method 9222D, Item 1 |
| 9 Method 1020-B, Item 2 | 22 Method 9223 B, Item 2 |
| 10 Method 4500-O B, Item 3 | 23 Method 9223 B, Item 3 |
| 11 Method 4500-O G, Item 3 | 24 Method 1603, Item 2 |
| 12 Method 5210-B, Item 5 | 25 Method 9030-B, Item 3 |
| 13 CFR 136.3, Table II | 26 Method 9020 B, Table IV |

● General Lab Criteria ●

Equipment Logbook Content - all maintenance performed on a piece of equipment should be documented in the logbook. This should include parts replacement and routine maintenance activities. Entries should include date, maintenance performed and initials of person making entry.

Preservation and Holding Times						
Parameter	Container	Min. Sample Size (mL)	Sample Type	Preservation	Maximum Storage Time	
					Recommended	Regulatory
BOD / CBOD	P, G	1000	G, C	Refrigerate $\leq 6^{\circ}\text{C}$	6h	48h
TSS	P, G	200	G, C	Refrigerate $\leq 6^{\circ}\text{C}$	7 d	7 d
pH	P, G	50	G	Analyze immediately	0.25h	0.25 h
NH ₃ -N	P, G	500	G, C	Analyze as soon as possible or add H ₂ SO ₄ to pH <2, Refrigerate $\leq 6^{\circ}\text{C}$	7 d	28 d
TRC	P, G	500	G	Analyze immediately	0.25h	0.25 h
DO (electrode)	G, BOD Bottle	300	G	Analyze immediately	0.25h	0.25 h
Temperature	P, G	--	G	Analyze immediately	0.25h	0.25 h
Metals, general	P, G	1000	G, C	For dissolved filter immediately and add HNO ₃ to pH <2	6 months	6 months
Purgeables by purge and trap	G (PTFE lined lid)	40 (X2)	G	HCl to pH<2, Refrigerate $\leq 6^{\circ}\text{C}$	7 d	14 d
Base/Neutrals and acids	G (solvent rinsed or baked)	1000	C, G	Refrigerate $\leq 6^{\circ}\text{C}$	7 d	7 days until extraction 40 days after extraction
Pesticides	G (PTFE lined lid)	1000	C	Refrigerate $\leq 6^{\circ}\text{C}$	7 d	7 days until extraction 40 days after extraction
Fecal Coliform / E-Coli	G, P (Sterilized)	100	G	Refrigerate $\leq 10^{\circ}\text{C}$ If chlorine present, add sodium thiosulfate tablet	6 hrs transport Start analysis within 2 hrs of receipt in lab.	
Oil and Grease	G	1000	G	HCl or H ₂ SO ₄ to pH <2, Refrigerate $\leq 6^{\circ}\text{C}$	28 d	28 d

Approved Standard Methods	
CBOD / BOD 5 Day	Std Methods 5210-B
Ammonia, Selective Electrode Method	Std Methods 4500-NH ₃ D
Total Residual Chlorine, DPD Colorimetric Method	Std Methods 4500-Cl G
Total Suspended Solids, Dried at 103-105 °C	Std Methods 2540-D
Dissolved Oxygen, Membrane Electrode Method	Std Method 4500-O G
pH, Electrometric Method	Std Methods 4500-H+ B
Fecal Coliform, Membrane Filter Procedure	Std Methods 9222D
Escherichia Coli, Enzyme Substrate Test	Std Method 9223B
Escherichia Coli Membrane Filtration Procedure	EPA Method 1603
Oil and Grease	USEPA 1664A or Std Methods 5520B
Metals, general	USEPA 200, Std Methods 3111B or C, or 3120B
Volatiles (Purgeables by purge and trap)	USEPA 6210, Std Methods 624
Semi-Volatiles (Base/Neutrals and acids)	USEPA 6410, Std Methods 625
Pesticides	USEPA 6410 and 6630, Std Methods 608

**JM SMUCKER LLC – CRISCO PLANT
NPDES COMPLIANCE EVALUATION INSPECTION
DATES OF INSPECTION: May 18, 2011**

ITEMS OF DISCUSSION FOR INSPECTION:

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 1, 2010 through May 18, 2011. There were no violations noted during that time for any of the facility's NPDES permits.

On June 8, 2010, the facility had a heat exchanger rupture. There was a discharge of vegetable oil to the Mill Creek. The facility hired a contractor who secured the release.

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 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 still 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 began seeding the plant around June 16, 2009 during plant shutdown. The seed is from Miller Brewery. The discharge is going to MSD of Greater Cincinnati. 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. Smucker is now working on the fluid cooler and phosphorus removal. The addition of ferric chloride just began. The facility is still discharging to MSD. During the past year, the tanks where the MBRs are located were recalled by the manufacturer. The welds were not adequately cleaned prior to the epoxy coating being applied. Because of this the epoxy began to chip. The MBRs were not damaged. The facility is also examining its activated sludge under the microscope to aid in the operation of the treatment system. The facility is hoping to begin discharging in the next two to three months.

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 was added to ensure that chlorine is not discharged. The source for the water in the reservoir has algae, and discussions are occurring with regards to this. Chlorine has not been added to the reservoir.

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.

The facility installed the signage required in its NPDES permit. This was done after the inspection last year. The facility applied for and has received coverage under the

renewed non-contact cooling water general permit. It is recommended the outfall signage be placed at the non-contact cooling water outfall covered under the general permit. The facility has not discharged under its hydrostatic test general permit.

RECOMMENDED ACTIONS

J.M. Smucker should post the signage noting its outfall covered under the general non-contact cooling water permit. That would allow it to be identified as a permitted NPDES discharge.

J.M. Smucker should develop SOPs for all the parameters it will be analyzing on-site as well as for sample collection. Details regarding what is needed can be found in the General Laboratory Criteria included in this report. This will allow the facility to have them in place when the discharges to waters of the State and the required reporting begin.



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