



Environmental
Protection Agency

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

June 8, 2011

RE: CARGILL SALT
3IE00003*GD
SUMMIT COUNTY

Ms. Amelia Adkins
Sr. EHS Professional
Cargill Salt
2065 Manchester Rd.
Akron, Ohio 44314-1770

Dear Ms. Adkins:

On May 18, 2011 this writer conducted a compliance evaluation inspection of your facility as it relates to the NPDES permit referenced above. You accompanied me during the inspection as well as Arjen Hoogenboom, Plant Manager, Cargill Salt.

Cargill Salt extracts salt from underground salt deposits using the solution mining process. Water is pumped through a well into a salt cavity dissolving salt. The dissolved salt is pumped back up to the surface and into the processing plant where salt is separated by barometric condensers and further processed depending upon the desired end product. You produce salt for numerous end users such as food manufacturers, retail, water treatment, feed manufacturers and general industry.

The following outfalls appear in your NPDES permit:

3IE00003601: This is the process wastewater outfall which receives water from the barometric condensers and accounts for the majority of flow from the facility on a daily basis. It is regulated by federal guideline 40 cfr 415.162 under sodium chloride production. This outfall is located in what is called the cistern. The water is sampled as it enters the cistern and before it mixes with non-process waters.

3IE00003001: This represents the collective discharge of boiler blowdown, storm water runoff, brine heater condensate and barometric condenser water to the Ohio/Erie Canal.

3IE00003801: This station represents the intake water from the canal. It is considered an upstream station from outfall 001.

3IE00003802: This station represents the intake water from two groundwater wells (one in use at a time). It is the main source of process water for the plant.

3IE00003901: This station represents the downstream station from outfall 001.

All stormwater that falls on your site is collected and eventually ends up as source water for solution mining. You maintain a separate General Industrial Stormwater permit for permit

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coverage. Your facility's process wastewater discharge (outfall 601) is regulated under federal guideline 40 cfr 415.162 Subpart P. The current permit loading limits were calculated at a production rate of 1000 tons per day.

We received a complaint last year that your discharge was noticeably hot. A review of outfall 901, which is the downstream outfall indicated that there were historic exceedences of the canal water for the pertinent water quality standards for the time period reviewed between 2004 and July 2010. For the time period of July 2010 through April 2011 there were only two exceedences (8/11/2010 and 9/24/2010). You indicated that there have been improvements made in maintaining the quality of the water used in the heat exchangers so that by-passing the heat exchangers have been virtually eliminated. This has reduced the temperature of the 001 discharge and subsequently the temperatures measured at outfall 901.

A review of your compliance with the limitations contained in your NPDES permit, as identified by our computer tracking system, indicates the following violations for the time period of October 2008 through April 2011:

Numeric violations

Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	pH	1D Conc	9.0	9.17	2/7/2011
001	pH	1D Conc	9.0	9.18	2/21/2011
601	pH	1D Conc	9.0	9.11	2/7/2011
001	Residue, Total Dissolv	30D Conc	1500	2920.	8/1/2010

Frequency Violations

Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	Nitrogen, Ammonia (NH3)	1/2Weeks	1	0	08/01/2010
601	Nitrogen, Ammonia (NH3)	1/2Weeks	1	0	08/01/2010

If you should have any questions, feel free to contact this writer at (330) 963-1136 or by e-mail at phil.rhodes@epa.state.oh.us.

Sincerely,



Philip P. Rhodes, P.E.
Environmental Specialist II
Division of Surface Water

PPT/mt

File: Industrial Permit / Compliance