



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

November 25, 2008

RE: CARGILL SALT
3IE00003*HX
SUMMIT COUNTY

Mr. Joe Payne
EHS Specialist
Cargill Inc., Salt Division
Akron Refinery
2065 Manchester Road
Akron, Ohio 44314-1770

Dear Mr. Payne:

On November 20, 2008 this writer conducted an inspection of your facility for the purpose of gathering information necessary to renew the above referenced NPDES permit. The NPDES permit contains the following outfalls:

↑ ↓
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. It could not be seen at the time of the inspection due to a large amount of steam due to the cold weather.

no more barometric
3IE00003001: this represents the collective discharge of boiler blowdown, storm water runoff, brine heater condensate and barometric condenser water to the Ohio/Erie Canal. The discharge was clear however it was noted that a large amount of sediment has accumulated at the outfall and just downstream of the outfall. A picture is attached for your reference.

3IE00003801: this station represents the intake water from the canal. It is considered an upstream station from outfall 001. Its use has dwindled during the life of the existing permit and is rarely used. It is understood that you wish to keep it in the renewal permit for the future.

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.

Since the last renewal, the facility has not changed except for an increase in efficiency in producing salt. In the NPDES permit application Cargill has requested a subsequent loading increase to reflect this additional capacity. Your facility's process wastewater

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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 800 tons per day. You are requesting that the permit reflect a production value of 1000 tons per day. The affected parameter in your permit is Total Suspended Solids. Due to the proposed loading increase your request is subject to Antidegradation review resulting in a public notice of the application. We do agree that the request qualifies for the exemption pursuant to OAC 3745-1-(D)-1-h-i.

The following items were also discussed during the inspection:

- 1) Cargill has sought coverage for storm water under the general storm water permit. The SWPPP was present during the inspection and it was requested that you send a copy to this writer for our review. It was suggested that Cargill eliminate the need to maintain two NPDES permits by combining the two. On behalf of Cargill, you declined.
- 2) The ammonia values reported in your renewal application for outfall 601 (31.9 mg/l) and outfall 001 (11.6 mg/l) are elevated. Reportedly, you do not add ammonia in any form. Therefore it should not be in your discharge. The permit renewal will contain monitoring for ammonia and a Part II condition to perform a study to determine its source and eliminate it from your discharge. If it cannot be eliminated then treatment may be necessary if there is a water quality concern.

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 November 2006 through September 2008:

Numeric violations

No numeric violations

Frequency Violations

Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
801	Total Suspended Solids	1/Month	1	0	04/01/2007
801	Residue, Total Dissolv	1/Month	1	0	04/01/2007
801	Total Suspended Solids	1/Month	1	0	07/01/2007
801	Residue, Total Dissolv	1/Month	1	0	07/01/2007
801	Total Suspended Solids	1/Month	1	0	08/01/2007
801	Residue, Total Dissolv	1/Month	1	0	08/01/2007
601	Flow Rate	1/Week	1	0	09/01/2007
801	Total Suspended Solids	1/Month	1	0	09/01/2007
801	Residue, Total Dissolv	1/Month	1	0	09/01/2007
801	Total Suspended Solids	1/Month	1	0	10/01/2007

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Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
801	Residue, Total Dissolv	1/Month	1	0	10/01/2007
801	Total Suspended Solids	1/Month	1	0	11/01/2007
801	Residue, Total Dissolv	1/Month	1	0	11/01/2007
601	Water Temperature	1/Week	1	0	11/22/2007
601	pH	1/Week	1	0	11/22/2007
601	Flow Rate	1/Week	1	0	12/01/2007
601	pH	1/Week	1	0	12/01/2007
801	Total Suspended Solids	1/Month	1	0	12/01/2007
801	Flow Rate	1/Week	1	0	12/01/2007
801	pH	1/Week	1	0	12/01/2007
801	Residue, Total Dissolv	1/Month	1	0	12/01/2007
801	Flow Rate	1/Week	1	0	12/08/2007
801	pH	1/Week	1	0	12/08/2007
801	Flow Rate	1/Week	1	0	12/15/2007
801	pH	1/Week	1	0	12/15/2007
801	Flow Rate	1/Week	1	0	12/22/2007
801	pH	1/Week	1	0	12/22/2007
801	Total Suspended Solids	1/Month	1	0	01/01/2008
801	Residue, Total Dissolv	1/Month	1	0	01/01/2008
601	Flow Rate	1/Week	1	0	01/08/2008
601	pH	1/Week	1	0	01/08/2008
801	pH	1/Week	1	0	01/15/2008
001	Flow Rate	1/Week	1	0	01/22/2008

If you should have any questions, feel free to contact this writer at (330) 963-1136.

Sincerely,



Philip P. Rhodes, P.E.
Environmental Engineer
Division of Surface Water

PPR/mt

Attachment

File: Industrial Permit / Compliance



00141 1/20/2008. Note
sediment build up.