Ohio | Environmental Protection Agency

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

Re: Notice of Violation
Henry County
Campbell Soup Company
Ohio EPA Permit No. 2IH00021
NPDES Permit No. OH0003298

April 8, 2011

Mr. Geoff Sans
Manager, Services & Utilites
Campbell Soup Supply Company
12-773 State Route 110
Napoleon, Ohio 43545

Dear Mr. Sans:

We are in receipt of your self-monitoring reports covering the month of May 2010 – February 2011 for the referenced facility. Our review indicates violations of the conditions of your NPDES permit. The specific instances of noncompliance are attached.

When entering explanation codes, such as AH, you must enter a note in eDMR justifying the use of the code. Failure to document appropriate codes with descriptive comments may result in a notice of violation.

For permit violations occurring from May 2010 – February 2011, please inform this office in writing within 20 days of receipt of this letter as to the reasons for the above referenced violations, as well as a description of the actions taken or proposed to prevent any further violations. Your response should include the dates, either actual or proposed, for completion of the actions.

Please be advised that failure to comply with the effluent limitations and/or monitoring requirements specified in your NPDES permit may be cause for enforcement action pursuant to Ohio Revised Code, Chapter 6111. If these violations continue to occur and if satisfactory progress is not made, it may be necessary to initiate enforcement action to achieve compliance.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner.

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402-9398

419 | 352 8461
419 | 352 8468 (fax)
www.epa.ohio.gov

You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, including fact sheets or US EPA's "facility Pollution Prevention Guide" (EPA/600/R-92.008), please contact the Ohio EPA Pollution Prevention Section at (614) 644-3469.

If there are any questions, please contact this office.

Sincerely,

Dana Martin-Hayden
Division of Surface Water

/llr

pc: DSW-NWDO-File

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2IH00021*HD	July 2010	001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.6	3.1	7/1/2010
2IH00021*HD	July 2010	001	00610	Nitrogen, Ammonia (NH3	30D Qty	60.56	66.2469	7/1/2010
2IH00021*HD	July 2010	001	80082	CBOD 5 day	30D Conc	25	30.25	7/1/2010
2IH00021*HD	August 2010	001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.6	4.3	8/1/2010
2IH00021*HD	August 2010	001	00610	Nitrogen, Ammonia (NH3	30D Qty	60.56	82.2943	8/1/2010
2IH00021*HD	September 2010	001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.6	1.6625	9/1/2010
2IH00021*HD	October 2010	009	00530	Total Suspended Solids	1D Conc	45	58.	10/26/2010
2IH00021*HD	October 2010	009	80082	CBOD 5 day	1D Conc	40	78.	10/26/2010

Campbell Soup Supply Company
12-773 State Route 110
P.O. Box 311
Napoleon, Ohio 43545
Phone: 419-592-1010
Fax: 419-599-6661

March 16, 2011

Dana Martin-Hayden
Ohio EPA NWDO
347 N. Dunbridge Road
Bowling Green, OH

Re: ***Chemical Change Pilot Study***
Campbell Soup Supply Company
Napoleon, Ohio

Ms. Martin-Hayden:

The Waste Water Treatment Plant (WWTP) at the Campbell Soup Supply Company (CSSC) proposes a pilot test study of a new treatment chemical. The WWTP currently uses a Sodium Bisulfite as a de-chlorinating agent after the disinfection process but prior to discharge. While the current chemical is effective when used for its intended purpose, the concentration of the chemical as delivered from the manufacturer/supplier makes it both noxious and toxic to the operators involved with the changing of the containers or repairing issues with the chemical feed system. We wish to conduct a pilot study with an alternative de-chlorinating agent, sold under the brand name Macro Specialty Industries (MSI) Anti-Chlor. The new product will be monitored for effectiveness and rate of usage. No change to the final effluent characteristics are intended or expected.

The intent of the test is to begin in early May 2011. An exact date cannot be provided at this time, as the test will begin once the current tote of chemical has been exhausted. This will limit the total number of chemical totes on site. Historical average usage during the summer months, beginning in May, has been one tote per month. The duration of the test period will depend on the performance of the chemical. The consumption of two (2) totes should be sufficient to establish the new products effectiveness in light of cost and safety. At the conclusion of the test period, a letter documenting the results and the decision on continued use will be submitted to your office, as requested.

I trust that this letter is responsive to your needs. Should you have any questions, please do not hesitate to contact me at 419-592-1010.

Sincerely.

Aaron McCoy
Campbell Soup Supply Company

attachments

Macro Specialty Industries, Inc.

12-457 Rd. P-3 Napoleon, Ohio 43545
Ph. 419.599.7010 Fax 419.599.7020 msi@bright.net

MSI Anti-Chlor

1. Product Identification

Synonyms: Sodium sulfite anhydrous; disodium sulfite; sulfurous acid, disodium salt; exsiccated sodium sulfite
CAS No.: 7757-83-7
Molecular Weight: 126.04
Chemical Formula: Na2SO3
Product Codes:
J.T. Baker: 3888, 3922
Mallinckrodt: 8056, 8064

2. Composition/Information on Ingredients

Ingredient	CAS No	Percent	Hazardous
Sodium Sulfite	7757-83-7	20-30 %	Yes
Water		70-80	No

3. Hazards Identification

Emergency Overview

WARNING! HARMFUL IF SWALLOWED. MAY CAUSE ALLERGIC REACTION AND BREATHING DIFFICULTIES. MAY CAUSE IRRITATION TO SKIN, EYES, AND RESPIRATORY TRACT.

SAF-T-DATA(tm) Ratings (Provided here for your convenience)

Health Rating: 2 - Moderate (Life)
Flammability Rating: 0 - None
Reactivity Rating: 1 - Slight
Contact Rating: 2 - Moderate
Lab Protective Equip: GOGGLES; LAB COAT; VENT HOOD; PROPER GLOVES
Storage Color Code: Green (General Storage)

Potential Health Effects

Although only moderately toxic in large amounts, sulfites can pose risk to some asthmatics producing central nervous system depression, bronchoconstriction and anaphylaxis.

Inhalation:
Inhalation of dust may cause irritation to the mucous membranes of the upper respiratory tract. Use of bronchodilators preserved with sulfites can cause allergic reactions.
Ingestion:
May cause gastric irritation by the liberation of sulfurous acid. Large doses may result in circulatory disturbances, diarrhea, and central nervous system depression. Estimated fatal dose is 0.5 to > 5g/kg.
Skin Contact:
May cause irritation.
Eye Contact:
May cause irritation, redness and pain.
Chronic Exposure:
No information found.
Aggravation of Pre-existing Conditions:
Some individuals are said to be dangerously sensitive to minute amounts of sulfites in foods and some bronchodilator medicines preserved with sulfites. Symptoms may include broncho constriction, shock, gastrointestinal disturbances, angio edema, flushing, and tingling sensations.

4. First Aid Measures

Inhalation:
Remove to fresh air. Get medical attention for any breathing difficulty.
Ingestion:
Induce vomiting immediately as directed by medical personnel. Never give anything by mouth to an unconscious person. Call a physician immediately.
Skin Contact:
Remove any contaminated clothing. Wash skin with soap and water for at least 15 minutes. Get medical attention if irritation develops or persists.
Eye Contact:
Immediately flush eyes with plenty of water for at least 15 minutes, lifting lower and upper eyelids occasionally. Get medical attention immediately.

5. Fire Fighting Measures

Fire:
Not considered to be a fire hazard. If involved in a fire, can emit toxic fumes and irritating and corrosive gases.
Explosion:
Not considered to be an explosion hazard.
Fire Extinguishing Media:
Use any means suitable for extinguishing surrounding fire.
Special Information:
In the event of a fire, wear full protective clothing and NIOSH-approved self-contained breathing apparatus with full facepiece operated in the pressure demand or other positive pressure mode.

6. Accidental Release Measures

Ventilate area of leak or spill. Wear appropriate personal protective equipment as specified in Section 8. Spills: Sweep up and containerize for reclamation or disposal. Vacuuming or wet sweeping may be used to avoid dust dispersal.

7. Handling and Storage

Keep in a tightly closed container. Protect from physical damage. Store in a cool, dry, ventilated area away from sources of heat, moisture and incompatibilities. Containers of this material may be hazardous when empty since they retain product residues (dust, solids); observe all warnings and precautions listed for the product.

8. Exposure Controls/Personal Protection

Airborne Exposure Limits:
-ACGIH Threshold Limit Value (TLV):
5mg/m3 (TWA) for sodium bisulfite & for sodium metabisulfite, A4 Not classifiable as a human carcinogen.
Ventilation System:
A system of local and/or general exhaust is recommended to keep employee exposures below the Airborne Exposure Limits. Local exhaust ventilation is generally preferred because it can control the emissions of the contaminant at its source, preventing dispersion of it into the general work area. Please refer to the ACGIH document, *Industrial Ventilation, A Manual of Recommended Practices*, most recent edition, for details.
Personal Respirators (NIOSH Approved):
If the exposure limit is exceeded and engineering controls are not feasible, a half facepiece particulate respirator (NIOSH type N95 or better filters) may be worn for up to ten times the exposure limit or the maximum use concentration specified by the appropriate regulatory agency or respirator supplier, whichever is lowest.. A full-face piece particulate respirator (NIOSH type N100 filters) may be worn up to 50 times the exposure limit, or the maximum use concentration specified by the appropriate regulatory agency, or respirator supplier, whichever is lowest. If oil particles (e.g. lubricants, cutting fluids, glycerine, etc.) are present, use a NIOSH type R or P filter. For emergencies or instances where the exposure levels are not known, use a full-facepiece positive-pressure, air-supplied respirator. WARNING: Air-purifying respirators do not protect workers in oxygen-deficient atmospheres.
Skin Protection:
Wear protective gloves and clean body-covering clothing.
Eye Protection:
Use chemical safety goggles. Maintain eye wash fountain and quick-drench facilities in work area.

9. Physical and Chemical Properties

Appearance:
White crystals.
Odor:
Odorless.
Solubility:
Soluble in ca. 3.2 parts water.
Specific Gravity:
2.6 @ 15.4C (60F)
pH:
ca. 9
% Volatiles by volume @ 21C (70F):

0
Boiling Point:
Not applicable.
Melting Point:
No information found.
Vapor Density (Air=1):
No information found.
Vapor Pressure (mm Hg):
No information found.
Evaporation Rate (BuAc=1):
No information found.

10. Stability and Reactivity

Stability:
Stable under ordinary conditions of use and storage. Heat and moisture contribute to instability. May air-oxidize.
Hazardous Decomposition Products:
Burning may produce sulfur oxides.
Hazardous Polymerization:
Will not occur.
Incompatibilities:
Acids, strong oxidizers, high temperatures.
Conditions to Avoid:
Heat and moisture.

11. Toxicological Information

Oral mouse LD50: 820 mg/kg. Investigated as a tumorigen and mutagen.

--------\Cancer Lists\----------

Ingredient	---NTP Carcinogen--- Known	Anticipated	IARC Category
Sodium Sulfite (7757-83-7)	No	No	3

12. Ecological Information

Environmental Fate:
No information found.
Environmental Toxicity:
No information found.

13. Disposal Considerations

Whatever cannot be saved for recovery or recycling should be managed in an appropriate and approved waste disposal facility. Processing, use or contamination of this product may change the waste management options. State and local disposal regulations may differ from federal disposal regulations. Dispose of container and unused contents in accordance with federal, state and local requirements.

14. Transport Information

Not regulated.

15. Regulatory Information

--------\Chemical Inventory Status - Part 1\----------

Ingredient	TSCA	EC	Japan	Australia
Sodium Sulfite (7757-83-7)	Yes	Yes	Yes	Yes

--------\Chemical Inventory Status - Part 2\----------

Ingredient	Korea	--Canada-- DSL	NDSL	Phil.
Sodium Sulfite (7757-83-7)	Yes	Yes	No	Yes

--------\Federal, State & International Regulations - Part 1\----------

Ingredient	-SARA 302- RQ	TPQ	------SARA 313------ List	Chemical Catg.
Sodium Sulfite (7757-83-7)	No	No	No	No

--------\Federal, State & International Regulations - Part 2\----------