



**Environmental
Protection Agency**

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

Re: Van Wert County
Bunge North America
NPDES Permit

December 15, 2010

Mr. Tony Matney, Facility Manager
Bunge North America (East) LLC
234 South Jefferson Street
Delphos, Ohio 45833

Dear Mr. Matney:

On December 9, 2010, a National Pollutant Discharge Elimination System (NPDES) permit compliance inspection was conducted at the Bunge North America, Delphos plant. Ms. Christine Thomas, Mr. Rob Andrews and you were present and provided information on plant operations. Our visit included an interview, an overview of plant processes, and observation of the discharge to Jennings Creek.

During our visit, the final effluent discharge of non-contact cooling water into Jennings Creek was clear. However, no samples were collected to verify compliance with NPDES permit limits.

One NPDES permit limitation violation (pH – October 2008) has been reported since the permit was issued in 2006. Our review of your discharge monitoring reports indicates that flow has been reported twice per month since issuance of your permit. As discussed, the monitoring frequency specified in your NPDES permit indicates that the flow rate must be reported when discharging. Please begin reporting the flow rate on a daily basis.

We have no record of formal approval of three of your cooling water additives (sodium hypochlorite, Performax 2021 A and sulfuric acid). These additives must be approved as outlined in Part II, C. of your NPDES permit.

We are currently processing your NPDES permit renewal application. Please continue following your current permit until the renewal permit becomes effective.

Mr. Tony Matney, Facility Manager
December 15, 2010
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Our completed report is enclosed for your records. If you have any questions, please call me at (419) 373-3008.

Sincerely,



Thomas Poffenbarger, P.E.
District Engineer
Division of Surface Water

/llr

Enclosure

pc: Ms. Christine Thomas, Bunge North America w/enclosure
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State of Ohio Environmental Protection Agency
Northwest District Office

NPDES Compliance Inspection Report

| Section A: National Data System Coding | | | | | |
|--|-----------|----------------|-----------------|-----------|---------------|
| Permit # | NPDES# | Month/Day/Year | Inspection Type | Inspector | Facility Type |
| OH0133 | OH0138363 | 12/9/2010 | C | | 2 |

| Section B: Facility Data | | |
|--|------------------------------|------------------------|
| Name and Location of Facility Inspected | Entry Time | Permit Effective Date |
| Bunge North America (East) LLC 234 South Jefferson Street Delphos, Ohio 45833 | 9:55 AM | January 1, 2006 |
| | Exit Time | Permit Expiration Date |
| | 10:50 AM | December 31, 2010 |
| Name(s) and Title(s) of On-Site Representatives | Phone Number(s) | |
| Mr. Tony Matney, Facility Manager Ms. Christine Thomas, Sr. Plant Eng, Environmental Mgr | 419-692-6010 260-724-1374 | |
| Name, Address and Title of Responsible Official | Phone Number | |
| Mr. Tony Matney, Facility Manager Bunge North America (East) LLC 234 South Jefferson Street Delphos, Ohio 45833 | 419-692-6010 | |

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

Section D: Summary of Findings (Attach additional sheets if necessary)

Final effluent discharge to Jennings Creek was clear.

Flow must be monitored on a daily basis.

Approval must be obtained for cooling water additives (sodium hypochlorite, Performax 2021 A and sulfuric acid).

We are currently processing your NPDES permit renewal application.

| Inspector | Reviewer |
|---|--|
| <i>Thomas Poffenbarger</i> 12/13/10 | <i>Elizabeth A. Wick</i> 12/13/10 |
| Thomas Poffenbarger, P.E. Date District Engineer Division of Surface Water Northwest District Office | Elizabeth A. Wick, P.E. Date Water Quality Engineer Division of Surface Water Northwest District Office |