



State of Ohio Environmental Protection Agency

**Southwest District Office**

401 E. Fifth St.  
Dayton, Ohio 45402

TELE: (937) 285-6357 FAX: (937) 285-6249  
www.epa.state.oh.us

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

July 31, 2008

RE: Reconnaissance Inspection

Mr. Doug Walton  
Tate & Lyle Citric Acid  
5600 Brentlinger Drive  
Dayton, OH 45414

Dear Mr. Walton:

On July 9<sup>th</sup> I met with you and Todd Davis to document the installation of the new well water supply that replaces the use of chlorinated city water for non-contact cooling discharged to the Great Miami River. Although the discharge of chlorine has been essentially eliminated, you indicated that you did not wish to modify your NPDES permit to remove the weekly chlorine monitoring requirement at this time.

I observed the new well head, the new water softener system and the substantial piping changes that were necessary to make the switch. I also observed the sodium thiosulfate feed system for dechlorination that will be a back-up means of compliance should city water be necessary because of problems with the well water supply system. This plumbing change requires significant time and effort to accomplish along with notification to the City of Dayton. The dechlorination chemical is to be pumped into the discharge line from two feed pumps and at two locations based on the discharge flow rate (one low flow conditions, two for high flows).

Please note that the dechlorination system is a waste water treatment system for which a permit to install (PTI) is required in accordance with Ohio Administrative Code 3745-42. It is necessary to submit PTI application Forms 1 and B5, the Antidegradation Addendum and three sets of plans bearing the seal and signature of a professional engineer registered in the State of Ohio. PTI application forms are available from our website at: <http://www.epa.state.oh.us/dsw/pti/PTIForms.html>. The engineering report that accompanies the application will need to explain how the feed system will allow for sufficient dechlorination throughout the range of anticipated flows while also not overfeeding such that dissolved oxygen is depressed in the receiving water.

Finally, Brad Brown contacted me regarding a preliminary compliance report notification that indicated Tate and Lyle failed to conduct weekly monitoring during the week of June 8<sup>th</sup> through the 14<sup>th</sup>. It was revealed that monitoring occurred on June 6<sup>th</sup> and June 15<sup>th</sup>. I explained that weekly monitoring is based on calendar days 1 through 7, 8 through 14, etc. and Mr. Brown indicated that Tate & Lyle would ensure monitoring occurred during these periods in the future. Since this was a minor issue, no response is necessary.

Thank you for your substantial efforts to meet the compliance schedule requirements of your NPDES permit. I hope your new system proves to be effective, reliable and beneficial to your operations. If you have any questions concerning this letter or the inspection form, please call me at (937) 285-6095.

Sincerely,

**Matt Walbridge**  
Division of Surface Water

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Ohio Environmental Protection Agency

# NPDES COMPLIANCE INSPECTION REPORT

## Section A: National Data System Coding

|                    |                  |                 |                 |           |               |
|--------------------|------------------|-----------------|-----------------|-----------|---------------|
| Permit Number      | NPDES Number     | Inspection Date | Inspection Type | Inspector | Facility Type |
| <b>11N00016*FD</b> | <b>OH0047368</b> | <b>7-9-08</b>   | <b>Recon</b>    | <b>S</b>  | <b>2</b>      |

## Section B: Facility Data

|   |                       |                        |
|---|-----------------------|------------------------|
| Name and Location of Facility Inspected:  | Entry Time            | Permit Effective Date  |
| <b>Tate &amp; Lyle Citric Acid<br/>5600 Brentlinger Drive<br/>Dayton, OH 45414</b>                                | <b>1300</b>           | <b>7-1-05</b>          |
|   | Exit Time             | Permit Expiration Date |
|   | <b>1430</b>           | <b>6-30-10</b>         |
| Name(s) and Titles of On-Site Representative(s)   | Phone Number(s)       |                        |
| <b>Doug Walton - Engineering</b>  | <b>(937) 235-4080</b> |                        |
| <b>Todd Davis - Plant Manager</b>   | <b>(937) 235-4112</b> |                        |
| Name, Title and Address of Responsible Official:  | Phone Number          |                        |
| <b>Todd Davis - Plant Manager<br/>Tate &amp; Lyle Citric Acid<br/>5600 Brentlinger Drive<br/>Dayton, OH 45414</b> | <b>(937) 235-4112</b> |                        |

## Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, NA = Not Applicable, NE = Not Evaluated)

|                                   |                                     |                               |
|-----------------------------------|-------------------------------------|-------------------------------|
| <b>S</b> Permit                   | <b>NE</b> Flow Measurement          | <b>NA</b> Pretreatment        |
| <b>S</b> Records/Reports          | <b>NA</b> Laboratory                | <b>S</b> Compliance Schedules |
| <b>S</b> Operations & Maintenance | <b>NE</b> Effluent/Receiving Waters | <b>NA</b> Collection System   |
| <b>S</b> Facility Site Review     | <b>NA</b> Sludge Storage/Disposal   | <b>NA</b> Other               |
| <b>S</b> Self-monitoring Program  |                                     |                               |

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

**New well is rated for 1250 gpm maximum but is nominally operated at 500-600 gpm. A variable frequency drive motor is used.**

**There is a sodium thiosulfate feed system with two feed pumps that inject sodium thiosulfate at two locations on the final discharge pipe prior to discharge to the ditch.**

**Switching back to chlorinated city water requires approximately six hours of work to install a connection 'spool'. The City of Dayton requires notification.**

**There was monitoring frequency violation for the week of June 8<sup>th</sup> but after speaking with Brad Brown of Tate & Lyle, it was a simple mistake that they now understand how to avoid in the future.**

|  |   |                        |
|--|---|------------------------|
| Name and Signature of Inspector(s)<br><br>Matt Walbridge | Agency / Office / Telephone<br><b>Ohio EPA / Southwest District Office / (937) 285-6095</b> | Date<br><b>7-30-08</b> |
| Name and Signature of Reviewer(s)<br><br>Martyn G. Burt  | Agency / Office / Telephone<br><b>Ohio EPA / Southwest District Office / (937) 285-6034</b> | Date<br><b>7/31/08</b> |