Ohio | Environmental Protection Agency

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

June 15, 2012

Mr. John Kilgore
J.M. Smucker LLC – Crisco Plant
5204 Spring Grove Avenue
Cincinnati, Ohio 45217

RE: J.M. Smucker LLC – Crisco Plant – CEI - OH0134155;1IH00026*DD
J.M. Smucker LLC – Crisco Plant – RI - OHH000001;1GH00003*AG
J.M. Smucker LLC – Crisco Plant – RI - OHGN00055;1GN00031*DG
J.M. Smucker LLC – Crisco Plant – RI – OHR000004; 1GR00599*DG
NOTICE OF VIOLATION

Dear Mr. Kilgore:

On May 31, 2012, I conducted a Compliance Evaluation Inspection (CEI) at the J.M. Smucker LLC – Crisco Plant. Karen Teter represented the facility. The purpose of the inspection was to evaluate compliance with the terms of the NPDES permit. Please note that the report, by its format, tends to highlight negative areas.

As indicated in the attached NPDES compliance inspection report, all areas rated received a satisfactory rating.

Thank you for the time extended during the inspection. If you have any questions, feel free to contact me at (937) 285-6108.

Sincerely,

Marianne Piekutowski
Environmental Specialist 2
Division of Surface Water

Enclosures

cc: Karen Teter, JM Smucker

MP/ca

Southwest District Office
401 East Fifth Street
Dayton, OH 45402-2911

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OhioEPA

State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	**NPDES#**	**Month/Day/Year**	**Inspection Type**	**Inspector**	**Facility Type**
1GR00599*DG	OHR00004	05/31/2012	R	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	**Entry Time**	**Permit Effective Date**
JM Smucker LLC – Crisco Facility 5204 Spring Grove Avenue Cincinnati, Ohio 45217	1:30 pm	08/29/2006
	Exit Time	**Permit Expiration Date**
	3:50 pm	05/31/2011
Name(s) and Title(s) of On-Site Representatives	**Phone Number(s)**	
Karen Teter, Manager/HSE & Sustainability Leader	513.482.8263	
Name, Address and Title of Responsible Official	**Phone Number**	
John Kilgore, Plant Manager JM Smucker LLC – Crisco Facility 5204 Spring Grove Avenue Cincinnati, Ohio 45217	513.482.8080	

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

Section D: Summary of Findings (Attach additional sheets if necessary)	
Inspector	**Reviewer**
6/18/12	6/19/12
Marianne Piekutowski Division of Surface Water Southwest District Office	Date Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

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Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	**NPDES#**	**Month/Day/Year**	**Inspection Type**	**Inspector**	**Facility Type**
1GH00003*AG	OHGH00004	05/31/2012	R	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	**Entry Time**	**Permit Effective Date**
JM Smucker LLC – Crisco Facility 5204 Spring Grove Avenue Cincinnati, Ohio 45217	1:30 pm	11/19/2007
	Exit Time	**Permit Expiration Date**
	3:50 pm	10/31/2012
Name(s) and Title(s) of On-Site Representatives	**Phone Number(s)**	
Karen Teter, Manager/HSE & Sustainability Leader	513.482.8263	
Name, Address and Title of Responsible Official	**Phone Number**	
John Kilgore, Plant Manager JM Smucker LLC – Crisco Facility 5204 Spring Grove Avenue Cincinnati, Ohio 45217	513.482.8080	

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

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

- There were no discharges under this permit from May 1, 2011 through June 14, 2012.

Inspector	Reviewer
6/18/12	6/19/12
Marianne Piekutowski Date Division of Surface Water Southwest District Office	Martyn Burt Date Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

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Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	**NPDES#**	**Month/Day/Year**	**Inspection Type**	**Inspector**	**Facility Type**
1GN00031*DG	OHGN00055	05/31/2012	R	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	**Entry Time**	**Permit Effective Date**
JM Smucker LLC – Crisco Facility 5204 Spring Grove Avenue Cincinnati, Ohio 45217	1:30 pm	06/01/2011
	Exit Time	**Permit Expiration Date**
	3:50 pm	05/31/2016
Name(s) and Title(s) of On-Site Representatives	**Phone Number(s)**	
Karen Teter, Manager/HSE & Sustainability Leader	513.482.8263	
Name, Address and Title of Responsible Official	**Phone Number**	
John Kilgore, Plant Manager JM Smucker LLC – Crisco Facility 5204 Spring Grove Avenue Cincinnati, Ohio 45217	513.482.8080	

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

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

- There were no violations for this outfall from May 1, 2011 through June 14, 2012. This is an auxillary non-contact cooling water outfall.

Inspector	Reviewer
6/18/12	6/19/12
Marianne Piekutowski Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
Date	Date

OhioEPA

State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	**NPDES#**	**Month/Day/Year**	**Inspection Type**	**Inspector**	**Facility Type**
1IH00026*DD	OH0134155	05/31/2012	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	**Entry Time**	**Permit Effective Date**
J.M. Smucker Co. LLC – Crisco Plant 5204 Spring Grove Avenue Cincinnati, Ohio 45217	1:30 pm	01/01/2010
	Exit Time	**Permit Expiration Date**
	3:50 pm	10/31/2013
Name(s) and Title(s) of On-Site Representatives	**Phone Number(s)**	
Karen Teter, Manager/HSE & Sustainability Leader	513.482.8263	
Name, Address and Title of Responsible Official	**Phone Number**	
John Kilgore, Plant Manager J.M. Smucker Co. LLC – Crisco Plant 5204 Spring Grove Avenue	513.482.8080	

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

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

See attached report.

Inspector	Reviewer
6/18/12	6/19/12
Marianne Piekutowski — Date Division of Surface Water Southwest District Office	Martyn Burt — Date Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Sections E thru K: Complete on all inspections as appropriate
Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

Section E: Permit Verification

Inspection observations verify the permit

(a) Correct name and mailing address of permittee ..... Y
(b) Correct name and location of receiving waters..... Y
(c) Do Categorical Standards apply?...If yes, list applicable standards.. N

(d) Product(s) and production rates conform with permit application (Industries)..... NA
(e) Flows and loadings conform with NPDES permit..... Y
(f) Treatment processes are as described in permit application... Y
(g) All discharges are permitted..... Y
(h) Number and location of discharge points are as described in permit..... Y
(i) Storm water discharges properly permitted..... Y

Comments/Status:

d) All of the process wastewater and treated storm water is still being discharged to Mill Creek. If the temperature of the wastewater is high, it will be discharged to MSD.
i) The facility had coverage under the general industrial stormwater permit for non-contaminated stormwater. The renewal NOI was mailed on January 27, 2012, but the facility has not received anything.

Section F: Compliance

(a) Any significant violations since the last inspection..... N
(b) Appropriate Non-compliance notification of violations..... Y
(c) Permittee is taking actions to resolve violations..... Y
(d) Permittee has a compliance schedule..... N
(e) Compliance schedule contained in...N/A
(f) Permittee is in compliance with schedule..... NA
(g) Has biomonitoring shown toxicity in discharge since last inspection NA

Comments/Status:

There has been one temperature and two ammonia violations since the facility began discharging to Mill Creek on November 8, 2011. There were also frequency violations due to confusion about what was considered a week. These issues have been resolved.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

(a) Standby power available.....generator ☐ or dual feed ☐..... N

i. What does the back-up power source operate.....

There are battery backups on all control equipment through an analog system. The company is now looking into a dual feed.

ii. How often is the generator tested under load.....

NA

(b) Which components have an alarm system available for power or equipment failures.....

Both of the main control processors have redundant alarms. There is a text page and an analog phone dialer to send out pages for outages.

(c) All treatment units in service other than backup units..... Y

(d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc.).....

The facility has at software-based TBM (Time-based maintenance). There also CILs (clean, inspect and lubricate) daily and weekly.

(e) Any major equipment breakdown since last inspection..... N

(f) Operation and maintenance manual provided and maintained..... Y

(g) Any plant bypasses since last inspection..... N

(h) Any plant upsets since last inspection..... N

Comments/Status:

The analog lines are used for waste treat. This was done so they would not be dependent upon power in the event of a power outage. Notifications can be made to personnel. The company is looking into a dual feed to the waste treatment area.

Section H: Sludge Management

(a) Method of Sludge Disposal…

- ☐ Land Application
- ☐ Haul to Another NPDES Permitee
- ☒ Haul to a Mixed Solid Waste Landfill

*if one of the selected methods is land application, complete applicable charts.

Class A - Exception Quality Sewage Sludge (monitoring station 584)

Pathogen Reduction Alternative	84370 Vector Attraction Reduction Options							
	Option 1 -38% Volatile Solids Reduction	Option 2 -Anaerobic Bench Scale Analysis	Option 3 – Aerobic Bench Scale Analysis	Option 4 – Specific Oxygen Uptake Rate	Option 5 – Aerobic Time and Temperature	Option 6 – Alkali Addition	Option 7 – >75% Percent Solids without Unstabilized Solids	Option 8 - >75% Percent Solids with Unstabilized Solids
Alternative 1 – Time and Temperature Regime (84369)	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 2 – High pH and High Temperature (84369)	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 3 – Other Processes (84369)	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 4 – Unknown Processes (84369)	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 5 – Composting (84397)	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 5 – Heat Drying (84397)	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 5 – Heat Treatment (84397)	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 5 – Thermophilic Aerobic Digestion (84397)	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 5 – Beta Ray Irradiation (84397)	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 5 – Gamma ray Irradiation (84397)	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 5 – Pasteurization (84397)	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 6 - Approved Equivalent Process	☐	☐	☐	☐	☐	☐	☐	☐

Class B Sewage Sludge (monitoring station 581)

Pathogen Reduction Alternative	84370 Vector Attraction Reduction Options									
	Option 1 -38% Volatile Solids Reduction	Option 2 -Anaerobic Bench Scale Analysis	Option 3 – Aerobic Bench Scale Analysis	Option 4 – Specific Oxygen Uptake Rate	Option 5 – Aerobic Time and Temperature	Option 6 – Alkali Addition	Option 7 – >75% Percent Solids without Unstabilized	Option 8 - >75% Percent Solids with Unstabilized	Option 9 – Land Injection	Option 10 – Immediate Incorporation
Alternative 1 - Geometric Mean of Seven Fecal Samples (84369)	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 2 - Aerobic Digestion (46396)	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 2 - Air Drying (46396)	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 2 - Anaerobic Digestion (46396)	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 2 – Composting (46396)	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 2 - Lime Treatment (46396)	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Alternative 3 – Approved Equivalent Process	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐

(a) Has amount of sludge generated changed significantly since the last inspection..... NA

(b) How much sludge storage is provided at the plant.....

NA

(c) Records kept in accordance with State and Federal law (5 years according to OAC 3745-40-06)..... NA

(d) Any complaints received in last year regarding sludge..... NA

(e) 5/8" screen at headworks for facilities that land apply sludge..... NA

(f) Are sludge application sites inspected to verify compliance with NPDES permit..... NA

(g) Is a contractor used for sludge disposal..... NA

If so, what is the name of the contractor.....

NA

Comments/Status:

Going to Green Castle, IN for use in cement. Looking at Braasch Farms to compost. The DAF bottoms go to the filter press and then to Rumpke. Oil skimming and DAF float go to North Bend Oil for biodiesel.

Section I: Self-Monitoring Program

Flow Measurement:

(a) Primary/Secondary flow measuring devices operated and maintained..... Y

Type of device (e.g. weir with ultrasonic level sensor):

002 has a weir & coreolus meter, 003 is estimates based on pump and run times, and 004 has a magmeter.

(b) Calibration frequency adequate ..... Y
(Date of last calibration: Weir done monthly)

(c) 24-hour recording instruments operated and maintained.....Y

(d) Flow measurement equipment adequate to handle full range of flows..... Y

(e) Actual flow discharged is measured..... Y

(f) Flow measuring equipment inspection frequency
☐Daily ☐Weekly ☐monthly ☒other

Comments/Status:

There is a backup collector for the data.

The flows are recorded on each shift for the non-contact cooling waters currently. When other discharges begin, they will be checked and maintained according to manufacturer's specifications. Outfall 002 has an annual third party calibration. There is a plan in place for yearly calibration for 004.

Section I: Self-Monitoring Program (con't)

Sampling:

(a) Sampling location(s) are as specified by permit..... Y
(b) Parameters and sampling frequency agree with permit..... Y
(c) Permittee uses required sampling method..... Y
(see GLC page)
(d) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e, continuous monitoring instrumentation, calibration and maintenance records)..... Y

Comments/Status:

Currently, outfall 003 is not discharging to Mill Creek. It is still going to MSD.

Section I: Self-Monitoring Program (con't)

Laboratory:

General

(a) Does the Quality Assurance Manual contain written Standard Operating Procedures (SOP's) for all analysis performed onsite..... NA

(b) Do SOP's include the following if applicable..... NA

- Title
- Scope and Application
- Summary
- Sample Handling and Preservation
- Interferences
- Apparatus and Materials
- Reagents
- Procedure
- Calculations
- Quality Control
- Maintenance
- Corrective Action
- Reference (Parent Method)

Note: Standard Methods 1020A establishes that "Quality assurance (QA) is the definitive program for laboratory operation that specifies the measure required to produce defensible data of know precision and accuracy. Standard operating procedures are to be used in the laboratory in sufficient detail that a competent analyst unfamiliar with the method can conduct a reliable review and/or obtain acceptable results." SOPs should be developed for each analytical procedure.

(c) EPA approved analytical testing procedures used (40 CFR 136.3).. Y

(d) If alternate analytical procedures are used, proper approval has been obtained..... N

(e) Analyses being performed more frequently than required by permit. N

(f) If (e) is yes, are results in permittee's self-monitoring report..... NA

(g) Satisfactory calibration and maintenance of instruments/equipment. Y (see score from GLC page)

(h) Commercial laboratory used..... Y

Parameters analyzed by commercial lab: *BOD, TKN, Nitrite-Nitrate, P, TSS, Ortho P, Oil & Grease, COD.*

Lab name: *Belmont Laboratories*

Discharge Monitoring Report Quality Assurance (DMRQA)

(a) Participation in latest USEPA quality assurance performance sampling..... Y
Date: 2/23/2012

(b) Were any parameters "Unsatisfactory"..... N

(c) Reasons for "Unsatisfactory" parameters.....

NA

Comments/Status:

The facility had a copy of Belmont's DMRQA report. All passed. The General Lab Criteria was not evaluated because all NPDES permit sampling is done off-site at Belmont Labs.

Section J: Effluent/Receiving Water Observations

Outfall # 002
Outfall Description: Final outfall from the cooling water reservoir prior to discharge to Mill Creek. (The outfall for the non-contact cooling water covered under the general non-contact cooling water general permit also discharges in this pipe.)
Receiving Stream: Mill Creek
Receiving Stream Description: Discharge into the channelized portion of Mill Creek. The water was clear and free of solids and color.

Outfall # 003
Outfall Description: Final outfall from storm water treatment system. It is a PVC pipe into the Mill Creek.
Receiving Stream: Mill Creek
Receiving Stream Description: Discharge into the channelized portion of Mill Creek. The facility has not begun to use this outfall at the current time. It is going to MSD.

Outfall # 004
Outfall Description: Final outfall from process wastewater treatment system. It is a PVC pipe into the Mill Creek.
Receiving Stream: Mill Creek
Receiving Stream Description: Discharge into the channelized portion of Mill Creek. The discharge began on November 8, 2011. There is a drop between the outfall pipe and the bottom of Mill Creek. There is small amount of foaming due to air entrained in the discharge, but it quickly dissipates.

Comments/Status:

Outfall signage is up on three outfalls in individual NPDES permit, and the outfall for the non-contact cooling water general permit.

Section K: Multimedia Observations

(a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
(b) Do you notice staining or discoloration of soils, pavement or floors.. N
(c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N
(d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
(e) Do you notice any unusual odors or strong chemical smells..... N
(f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities.....N

If any of the above are observed, ask the following questions:

(1) What is the cause of the condition?
(2) Is the observed condition or source a waste product?
(3) Where is the suspected contaminant normally disposed?
(4) Is this disposal permitted?
(5) How long has the condition existed and when did it begin?

Comments/Status:

The facility was clean and well-maintained. The storm drains on-site had been repainted a bright green to denote they discharge to Mill Creek. The process wastewater treatment system is operational, and is discharging to Mill Creek. The storm water for outfall 003 is still discharging to MSD.

JM SMUCKER LLC – CRISCO PLANT
NPDES COMPLIANCE EVALUATION INSPECTION
DATE OF INSPECTION: May 31, 2012

ITEMS OF DISCUSSION FOR INSPECTION:

The eDMRs were reviewed for compliance. There were no violations for any of the general permits. The violations associated with Smucker's individual permit are listed below. The process wastewater began discharging to Mill Creek on November 9, 2011. Smucker's NPDES permit will be expiring in October 2013. The application should be submitted six months prior to the expiration date of the permit.

COMPLIANCE EVALUATION:

Compliance was evaluated from May 1, 2011 through June 14, 2012. The following violations were noted:

EFFLUENT LIMIT VIOLATIONS

Station No. 1IH00026004

Parameter	Code	Date	Permit Limit	Reported
Water Temperature	00010	3/17/2012	32°C	32.15°C
Nitrogen, Ammonia (NH3-N)	00610	4/24/2012	1.5 mg/L	3.8 mg/L
Nitrogen, Ammonia (NH3-N)	00610	4/27/2012	1.5 mg/L	4.0 mg/L

In addition, there were the following frequency violations:

FREQUENCY VIOLATIONS

Station No. 1IH00026004

Parameter	Code	Date	Samples Required	Samples Reported
Total Suspended Solids	00530	2/1/2012	2/week	1
Biochemical Oxygen Demand	00310	2/1/2012	2/week	1
Phosphorus, Total (P)	00665	2/1/2012	2/week	1
Oil and Grease, Hexane	00552	2/1/2012	2/week	1
Nitrogen, Ammonia (NH3-N)	00610	2/1/2012	2/week	1

Please be advised that failure to comply with the effluent limitations, or to satisfy monitoring or reporting requirements of your NPDES permit, may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111. The step(s) being taken to resolve these violations have been provided in the notification of violation provided by the facility. Smucker has also adopted standard operating procedures to prevent the frequency violations from recurring. The facility has returned to compliance.

OBSERVATIONS:

JM Smucker LLC – Crisco Plant manufactures shortenings and oils. Approximately 80% of the raw materials come into the site in rail cars. The raw materials are crude oils that come from crushed seeds. The crude oils are then refined, bleached and hardened on-site. A caustic refining process is used. One of the major contaminants in the canola oil is chlorophyll.

In the refining process, the contaminants are mainly lipid-soluble. Phosphoric acid is added to solublize the liquid, and it is then neutralized with lye. This will react with the free fatty acids to help clean the product. Soft water is then added. The material is then centrifuged. The heavy (water) portion, or foots, are then sold as a by-product. The canola oil will go through another wash step to remove 'soapy' contaminants

Bleaching earth is then used to remove metal, colors and oxidizers from the oils. After this step, the refined oils can take one of two paths. It can become either shortening or oil. In the shortening process, there is a hydrogenation step that is done with a catalyst. This allows the process to occur at a lower temperature so that it is still edible. The product is then packaged and shipped off-site for sale. Products are made in sizes for the home consumer to commercial customers.

The process wastewater associated with this site is now discharging to Mill Creek. The storm water from the south yard area has been approved to be treated and discharged under the facility's NPDES permit. The construction has been completed on both of the treatment systems. The wastewater associated with the storm water is currently being discharged to MSD. The sanitary flow from the facility also discharges to MSD of Greater Cincinnati. This will remain in MSD's collection system. Smucker has the option of discharging its process wastewater to MSD instead of its NDPES permitted outfall if the discharge is out of compliance with its permit limits.

The storm water system will consist of gross solids filtration, neutralization, and oil removal. This will take contaminated storm water from the South Yard where rail cars are loaded and unloaded as well as the aboveground storage tanks, and allow it to be treated for discharge directly to the Mill Creek. There are two different treatment scenarios in place for the removal of the oils. There will be a belt skimmer on the modified catch basin to allow for all free oils to be removed, and provisions have been made for the installation of an organoclay media filter. The facility is still investigating the idea of treating the storm water through the process wastewater treatment system since capacity is available. Currently, this discharge is going to MSD of Greater Cincinnati.

The process wastewater system is more elaborate. It includes gross oil removal, pH adjustment, equalization, heat exchangers, gross solids removal, diffused air flotation

with polymer addition, organoclay media filters (if needed), phosphorus removal, and membrane bioreactors. The facility began seeding the plant around June 16, 2009 during plant shutdown. The seed is from Miller Brewery. The discharge is going to Mill Creek as of November 9, 2011. Both the storm water and process wastewater system have an interconnection to MSD to allow for discharge to the sanitary sewer in the event of a process upset or problem with the treatment works

The facility is looking at using a non-contact cooling water additive to reduce the algae in the discharge from the reservoir. A dechlorination system was added to ensure that chlorine is not discharged. The source for the water in the reservoir has algae, and discussions are occurring with regards to this. Chlorine has not been added to the reservoir. The reservoir was cleaned in the spring of 2012, and a portion of the discharge was done through the non-contact cooling water general permit.

The facility has a general permit for some of its non-contact cooling water. Outfall 001 is covered in this permit. When there is too much water or an upset condition in the reservoir, it will discharge from Outfall 001 under the general permit. Usually the non-contact cooling water is discharged from Outfall 002. The same pH probe is used for 001 and 002. The probe is located in the middle of the reservoir. This reservoir is also used as the fire water reservoir for the campus. The facility also has a general permit for the hydrostatic testing of both old and new tanks. There have been no discharges associated with this permit. Outfall 001 also has a portion of the uncontaminated storm water covered under the general industrial storm water permit discharging. The storm drains in this area are painted green. The facility also had coverage under the expired general industrial storm water permit. The annual storm water inspection was conducted on November 8, 2011. The Notice of Intent (NOI) for the renewal of the general industrial storm water permit was submitted to Ohio EPA on January 27, 2012. It is being reviewed. The subsector covering Smucker has benchmark monitoring, and the permit must be issued through SWIMS. As part of the inspection, the SWP3 was evaluated. The plant manager needs updating. Smucker is in the process of updating its SWP3 to comply with the new industrial storm water permit. EQM has been hired to do this. On June 15, 2012, Jason Fyffe of our Central Office sent you an email requesting additional information for the Notice of Intent (NOI). Smucker needs to address these items.

As part of the inspection, the inclusion of the general non-contact cooling water and the general industrial storm water permit in Smucker's individual NPDES permit were discussed. This would allow the facility to have one permit that is inclusive of all its discharges. Smucker will also need to verify if outfall listed as 006 and 007 in the Storm Water Pollution Prevention Plan (SWP3) are tributary to the combined sewer, or are discharging directly to Mill Creek via a storm sewer.

The General Laboratory Criteria (GLC) were not evaluated as part of this inspection. The facility uses a contract laboratory for their analytical work. Smucker receives a copy of the DMRQA report for its records.

REQUIRED ACTION:

J.M. Smucker must address the missing items in the June 15, 2012 email from Jason Fyffe for the storm water NOI.