



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

July 26, 2012

RE: CARGILL DEICING TECHNOLOGY
CUYAHOGA COUNTY
CITY OF CLEVELAND
NPDES PERMIT NO. OH0000329
OHIO EPA PERMIT NO. 3IE00042
COMPLIANCE EVALUATION INSPECTION

Robert Supko, Plant Manager
Cargill Deicing Technology
2400 Ships Channel
Cleveland, OH 44113

Dear Mr. Mr. Supko:

On June 26, 2012, this office met with David Bird and proceeded to conduct an inspection of the above referenced facility. In addition, present during the inspection was Mr. Jim Weber of Water & Wastewater Laboratories, Inc. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit. During the course of the inspection, evaluations were conducted of the facility's treatment processes and equipment and effluent discharge quality at the outfalls.

NPDES Permit Status

The NPDES permit for this facility was issued effective February 1, 2010, and will expire on January 31, 2015. The NPDES permit authorizes the discharge of wastewater from the 10,000-gpd extended aeration wastewater treatment plant (WWTP) via outfall 001, and uncontaminated storm water associated with industrial activity from outfalls 002 – 010, to the Ships Channel of the Cuyahoga River.

Facility Description

Cargill is a salt mining and processing facility. Salt is mined underground, crushed and transported to the surface via conveyors and a large elevator shaft. Surface operations include processing and packaging of the salt and production of animal grade salt blocks. Bulk salt is loaded into trucks, railroad cars and ships for distribution. Salt is also packaged into bags for industrial and private use.

Components of the WWTP consists of an equalization tank, trash trap, aeration tank and clarifier, upflow filter tank, dosing chamber, surface sand filter divided into two beds and ultraviolet disinfection. Sludge is transferred to an aerated sludge holding tank and hauled off site for proper disposal.

Inspection Findings/Compliance Status

At the time of the inspection:

- The WWTP appeared to be functioning properly.

- The NPDES permit requires the placement of an identification sign at all outfalls containing sanitary or industrial discharges. No such sign was evident at Outfall 001.
- All parameters required by the NPDES permits are collected and analyzed by the contract laboratory. Samples sent to the contract laboratory are submitted under a chain of custody. Data for daily parameters (i.e., flow, color, odor and turbidity) are the responsibility of facility personnel.
- In accordance with Parts IV, V and VI of the NPDES permit, the permittee currently maintains and implements a storm water pollution prevention plan (SWP3), dated January 2011. Please ensure that the map in the plan clearly delineates the drainage area for the respective storm outfalls.
- The SWP3 records included detailed documentation of monthly site evaluations performed by Mr. Bird. However, it did not appear that the semi-annual certification inspections referenced in the SWP3 were being formalized. As a practical matter, and given the information represented on the monthly reports, it was recommended to Mr. Bird that the SWP3 be revised to reflect current inspection practices. The facility shall also ensure that at least one comprehensive site compliance evaluation is performed and certified pursuant to the requirements in Part IV of the permit.

Discharge monitoring reports (DMRs), received by Ohio EPA for the period, February 2010 - June 2012, were reviewed for compliance with the effluent limitations and monitoring requirements of the NPDES permit. The specific instances of noncompliance are as follows:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2010	001	pH	1D Conc	6.5	6.3	3/18/2010
April 2010	001	pH	1D Conc	6.5	6.	4/28/2010
July 2010	001	Nitrogen, Ammonia (NH3)	30D Conc	2.0	2.48	7/1/2010
August 2010	001	Nitrogen, Ammonia (NH3)	30D Conc	2.0	6.34	8/1/2010
August 2010	001	Nitrogen, Ammonia (NH3)	7D Conc	3.0	12.6	8/1/2010
August 2010	001	Nitrogen, Ammonia (NH3)	30D Qty	0.08	.12131	8/1/2010
August 2010	001	Nitrogen, Ammonia (NH3)	7D Qty	0.11	.24136	8/1/2010
August 2010	001	Fecal Coliform	7D Conc	2000	12800.	8/1/2010
August 2010	001	pH	1D Conc	6.5	6.1	8/20/2010
December 2010	001	pH	1D Conc	6.5	6.4	12/17/2010
December 2010	001	pH	1D Conc	6.5	6.4	12/28/2010
March 2011	001	Total Suspended Solids	30D Conc	12	50.	3/1/2011
March 2011	001	Total Suspended Solids	30D Qty	0.45	.78652	3/1/2011
March 2011	001	Total Suspended Solids	7D Conc	18	50.	3/8/2011
March 2011	001	Total Suspended Solids	7D Qty	0.68	.78652	3/8/2011
March 2011	001	pH	1D Conc	9.0	9.3	3/25/2011

Please be advised that failure to comply with the terms and conditions of your NPDES permit may be subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in fines of up to \$10,000 per day of violation. Please inform this office, in writing, within 10 days of receipt of this notification as to the actions taken or proposed to address the above violation and/or deficiencies. Your response *shall* include specific dates for completion of the actions. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

Should you have any questions or comments regarding this letter, please contact me at (330) 963-1196.

Respectfully,



Ermelindo Gomes
Environmental Engineer
Division of Surface Water

EG/cs

File: Industrial/Permit-Compliance//Cargill Salt