



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

June 21, 2013

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*BG
J.M. Smucker LLC – Crisco Plant – RI - OHGN00055; 1GN00031*DG
J.M. Smucker LLC – Crisco Plant – RI – OHR000004; 1GR00599*EG**

Dear Mr. Kilgore:

On June 11, 2013, Sara Hise and I conducted a Pre-Permit/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 with the exception of “Effluent/Receiving Water”. This received a marginal rating due to the ammonia violations during the past year.

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

MP/kb

Enclosures

cc: Karen Teter, JM Smucker



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
1GH00003*BG	OHGH00004	06/11/2013	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	10:30 am	02/01/2013
	Exit Time	Permit Expiration Date
	1:00 pm	10/31/2017
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, 2012 through June 11, 2013. There were no discharges under this permit during past year.

Inspector	Reviewer
 Date: 6/21/13	 Date: 6/21/13
Marianne Piekutowski Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office



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
1GN00031*DG	OHGN00055	06/11/2013	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	10:30 am	06/01/2011
	Exit Time	Permit Expiration Date
	1:00 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 July 1, 2012 through June 11, 2013. This is an auxillary non-contact cooling water outfall. The code violations for June 2012 were addressed in December 21, 2012 Notice of Violation.

Inspector	Reviewer
 Date: 6/21/13	 Date: 6/21/13
Marianne Piekutowski Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office



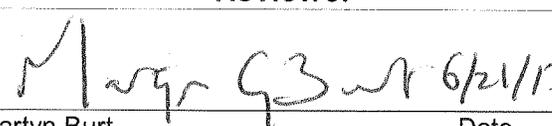
State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1GR00599*EG	OHR00005	06/11/2013	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	10:30 am	09/01/2012
	Exit Time	Permit Expiration Date
	1:00 pm	12/31/2016
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	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)			
<ul style="list-style-type: none"> - Facility will be eliminating this permit with the upcoming renewal of their individual NPDES permit. Outfalls 005 and 006 actually go to combined sewer. - Subsector U2 is applicable to this facility. Benchmark monitoring is required for BOD5, COD, Nitrite-Nitrate Nitrogen, TSS. Initial round of sampling done. Well below benchmark values. - The SWP3 has been updated to reflect the multi-sector permit requirements. - Once individual NPDES permit becomes effective, a Notice of Termination will be required for this permit. 			
Inspector		Reviewer	
 Date: 6/21/13		 Date: 6/21/13	
Marianne Piekutowski Division of Surface Water Southwest District Office		Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office	



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	06/11/2013	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	10:30 am	01/01/2010
	Exit Time	Permit Expiration Date
	1:00 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	M	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
 Date: 6/21/13	 Date: 6/21/13
Marianne Piekutowski Division of Surface Water Southwest District Office	Martyn Burt 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:

e) In the renewal application, the facility is asking to change the design flow from 1.44 MGD to 1.152 MGD since the future third MBR will not be installed. This is related to a request for an increase in the temperature limit.
i) Currently, the facility has coverage under the general industrial storm water permit. It was found that two of the outfalls discharge to the combined sewer and the other storm water is discharged through 001. When the permit is renewed, the storm water permit will be terminated.

Section F: Compliance

- (a) Any significant violations since the last inspection..... Y
- (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:

The facility had ammonia violations in August and November 2012. In December 2012, the facility had a compliance attainment meeting with Ohio EPA, and had a compliance and enforcement plan developed. There have been no violations since November 2012. The reasons for the violation were determined and addressed. Because of this, a rating of marginal was given for "Effluent/Receiving Stream". The facility has returned to compliance.

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 for the main facility.
 - 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..... N
- (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..... Y
- (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.

c) The treatment system has been down since February 2013 due to repairs needed for the outside aeration tanks. The facility has been discharging to MSD of Greater Cincinnati.

f) The air piping to the aeration tank went out. When the line was installed, there were U-bolts missing from the installation. These U-bolts were designed to keep the line carrying the air from moving. Because of the movement of the line, it sheared off. The facility is in the process of bringing the system back on-line, and should begin discharging the next few weeks.

Section H: Sludge Management

(a) Method of Sludge Disposal...

- Land Application
- Haul to Another NPDES Permittee
- 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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 – High pH and High Temperature (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 3 – Other Processes (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 4 – Unknown Processes (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Composting (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Heat Drying (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Heat Treatment (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Thermophilic Aerobic Digestion (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Beta Ray Irradiation (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Gamma ray Irradiation (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Pasteurization (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 6 - Approved Equivalent Process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Aerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Air Drying (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Anaerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 – Composting (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Lime Treatment (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 3 – Approved Equivalent Process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- (a) Has amount of sludge generated changed significantly since the last inspection..... NA
- (b) How much sludge storage is provided at the plant.....
- (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.....

Comments/Status:

The solids & spent bleaching earth are taken to Compost Cincinnati to be made into compost. This has resulted in a 90% reduction to landfill. Oil skimming and DAF float go to AM Commodities 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 : Yearly. On critical calibration list.

Comments/Status:

There is a backup collector for the data. Stephens Instruments Service is doing the calibrations. 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..... Y
- (b) Do SOP's include the following if applicable..... Y
 - 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 known 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 Still waiting on the 2013 results.
- (b) Were any parameters "Unsatisfactory"..... NA
- (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 # 001

Outfall Description: Final outfall for the non-contact cooling water covered under the general non-contact cooling water general permit also discharges in this pipe. Also contains storm water from a portion of the site.

Receiving Stream: Mill Creek

Receiving Stream Description: Discharge into the channelized portion of Mill Creek. No discharge on day of inspection.

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 is currently going to MSD as the treatment system is brought back on-line.

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

Permit # : 1IH00026*DD
NPDES #: OH0134155

- (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 being brought back on-line after repairs to the air lines in the aeration tank. Currently, the discharge goes to MSD. The storm water for outfall 003 is still discharging to MSD.

Permit # : 1IH00026*DD
NPDES #: OH0134155

JM SMUCKER LLC – CRISCO PLANT
NPDES COMPLIANCE EVALUATION INSPECTION
DATES OF INSPECTION: June 11, 2013

ITEMS OF DISCUSSION FOR INSPECTION:

The facility has submitted its NPDES renewal application. There is a request for an increase in the temperature limit while lowering the design flow rate. In addition, due to a change in materials used in production, the nickel catalyst is no longer being used. Ohio EPA will evaluate eliminating the monitoring for nickel in the renewal.

COMPLIANCE EVALUATION:

Compliance with the facility's individual NPDES permit was evaluated from December 1, 2012 through June 11, 2013. There were no violations noted in that timeframe. On December 19, 2012, Ohio EPA had a compliance attainment meeting with the facility regarding ammonia violations. In August 2012 and November 2012, the facility had violations of its ammonia limits which caused the facility to go into significant non-compliance. The reasons for the non-compliance were discussed, and a compliance and enforcement plan was developed. These violations were addressed in a December 21, 2012 Notice of Violation (NOV). The facility has been in compliance with its NPDES permit since that time. The November 2012 violations will be dropping off of the quarterly non-compliance reports in June 2013.

There were no discharges under the facility's renewed hydrostatic testing permit during the past year. The facility is in compliance with this permit.

There were code violations in June 2012 of the facility's non-contact cooling water general permit. The automated sampling equipment was repaired. The facility has been in compliance with this permit since July 2012.

The facility renewed its coverage under the renewed general industrial storm water permit. The items noted in last year's inspection regarding the storm water Notice of Intent (NOI) were addressed. As a result of the inspection, the facility investigated where its storm water outfalls discharged. It was determined outfalls 005 and 006 discharged to MSD of Greater Cincinnati's combined sewer system, and did not need coverage under the general storm water permit. The storm water outfall from the south yard is covered under outfall 003 of the facility's individual NPDES permit. The only other location where storm water is discharged to the Mill Creek is under outfall 001 of the non-contact cooling water general permit. With the latest renewal of the individual permit, this storm water discharge is receiving coverage. Once the renewed permit is issued, the facility will no longer need coverage under the general industrial storm water permit. At that time, the permit will be terminated. Currently, the facility is covered under Subsector U2, Fats and Oils Products. The storm water pollution prevention plan (SWP3) has been revised to reflect the new permit. This subsector does have benchmark monitoring associated with it. The first round of sampling was completed.

J.M. Smucker -- Page 2

The data shows the facility is well below these benchmark values. This will be incorporated into outfall 001 on the facility's individual NPDES permit.

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. 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 was 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 wastewater associated with the storm water is currently being discharged to MSD of Greater Cincinnati. The sanitary flow from the facility also discharges to MSD. This will remain in MSD's collection system. Smucker has the option of discharging its process wastewater to MSD instead of it's NDPEs permitted outfall if the discharge is out of compliance with its permit limits.

The storm water system consists 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.

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. In February 2013, the process wastewater discharge had to be diverted to MSD for discharge. The aeration piping in the outdoor aeration tank was broken. When the line was installed, four U-bolts were noted in the plans to secure the aeration line. They were not installed. As the system ran, the steel pipe began to move up and down. This eventually caused the pipe to shear off. The entire aeration system had to be replaced. The facility is in the process of bringing the system back on-line. A portion of the bacteria used in the aeration system was maintained. This is being used to seed the process. It is expected to begin discharging in the next few weeks. Ohio EPA should be notified when this occurs. In addition, the facility is working to optimize the operations of the dissolved air flotation (DAF) system. The goal is to provide a steadier stream of food to the bacteria in the outdoor aeration tanks. 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

A dechlorination system was added to the reservoir to ensure that chlorine is not discharged. Chlorine has not been added to the reservoir. St. Bernard Soap Company has been in contact with Ohio EPA regarding the use of a new additive to this reservoir. An email regarding this was forwarded onto Smucker after the inspection since the discharge is covered under its NPDES 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. 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 general industrial storm water permit.

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.