



Deicing Technology
P.O. Box B
Lansing, NY 14882

November 2, 2017

Mr. Matthew Podniesinski
Chief, Resource Development Section
Bureau of Resource Management & Development
Division of Mineral Resources
New York State Department of Environmental Conservation
625 Broadway, Third Floor
Albany, New York 12233-6500

RE: Annual Report for Mine File #709-3-29-0052; Cayuga Salt Mine
Permit ID#0-9999-00075-00001
Towns of Lansing and Ulysses, County of Tompkins
Town of Covert, County of Seneca

Dear Mr. Podniesinski:

Enclosed is an annual report required in accordance with the Special Conditions section (item numbers 15.a through 15.g) of DEC permit number 0-9999-00075/00001. This report will address each reporting requirement separately (15.a.(1), 15.a.(2), etc.) and drawings are attached as required. As requested, all technical data associated with monitoring of mine stability will be sent to the John T. Boyd Company with attention to Dr. Vincent Scovazzo. A copy of this report is in the mail to Christopher Lucidi, the Region 7 Mined Land Reclamation Specialist and to Steven Army, the Region 8 Mining Program Supervisor.

If any questions arise please bring them to my attention at your earliest convenience.

With Best Regards,

A handwritten signature in black ink that reads "Shawn G. Wilczynski". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Shawn G. Wilczynski
Mine Manager – Cargill Deicing Technology

Annual Reporting, Monitoring, and Notifications

15.a.(1) - Cargill Cayuga Mine Manager Certification:

I, Shawn G. Wilczynski, Mine Manager – Cargill Deicing Technology, certify that all mining activities, to the best of my knowledge, conducted during the reporting period from November 18, 2016 to present were in conformance with the DEC Permit # 0-9999-00075/00001 and the approved plans. No variances occurred and none were reported.

Signed: Shawn G. Wilczynski Date: 11/2/17

15.a.(2) - Summary of all non-routine mining incidents:

The Cayuga Mine is not aware of any non-routine incidents associated with the mining, processing, or other mine related activities that would have adversely affected any of the following:

- Mine stability
- Ground and surface water
- Natural resources
- Health, safety, welfare or property of the general public

15.a.(3) - 3 Year Mining Plan

A map is attached depicting the current and proposed mining for the next three years.

The Cayuga Mine is currently operating in the northern region of the mine. Active mining is located in panels U-63E to the east under the land, U-80 to the southwest, and NW-3 to the northwest.

15.a.(4) - Summary of In-situ Measurements of Rock Mechanics:

The Cayuga Mine continues to collect mine convergence data in accordance with the guidelines previously established in the Mined Land Use Plan. Convergence stations are typically installed at the "face" of active tunnels in mining panels with a profile of three stations located in the center and edges of the yield pillar panels. The convergence stations are usually read daily during the first week and then shifted to a weekly schedule until the next profile is installed. The initial profile will then be monitored on a monthly or quarterly schedule for the duration of mining of the panel. After abandonment of the panel, specific convergence stations are monitored quarterly. Currently, there are over 300 convergence stations being monitored. Once the data from the convergence stations has been collected it is evaluated both internally and externally for trends to ensure that each panel and the mine are behaving properly.

Evaluations of the convergence data indicate that no unusual trends have been identified and the mine is behaving as expected. There continues to be two slight anomalies: the U-40B and U-12 areas. Since backfill placement in U-40B was completed the convergence rates have slowed and are trending back toward historical rates. The U-12 panel is also trending toward normal rates. These areas are being monitored more frequently as we try to understand why the rates were higher than expected.

Roof sag and wall expansion, measured with extensometers, is also monitored as conditions warrant, and is reviewed internally and externally as well. This data indicates the mine is behaving as expected. The Cayuga Mine operates a micro-seismic monitoring network which now has over 70 geophones and covers over 5 square miles of mine workings. The data from this system is reviewed daily in-house and

by Engineering Seismology Group (ESG), and is summarized in a monthly report by ESG. This data indicates the mine is behaving as expected.

15.a.(5) - Summary of Subsidence Monitoring:

Surface subsidence measurements continue to be performed in accordance with the Mined Land Use Plan. While no surveys were conducted during the year, previous surveys indicate that the mine is behaving as expected with no anomalous subsidence zones. The next round of measurements are being planned to start in the spring of 2018. Note that a new subsidence loop was added in 2015 surrounding the 150 acres recently added to the mine reserves (at 1001 Ridge Road in Lansing, NY) and will be included in the upcoming survey.

15.a.(6) Source and Volume of Water Inflow Into the Mine and Disposition of Such Water:

The following is a list of sources and associated flow rates of water into the Cayuga Mine:

- Production Shaft (#1 shaft) – 23 gallons per minute (gpm)
- Ventilation Shaft (#2 shaft) – 9 gpm
- Service Shaft (#3 shaft) - 1gpm
- ED Plant Concentrate discharge – 3 gpm

- Total Water Inflow = 36 gpm

All of the water is directed to a settling pond located on the 4-level of the mine. The water is then pumped from the settling pond to abandoned areas at the far east end of 4-level as well as to various areas of the active mine for dust control. Recent volume calculations indicated that at our current rate of storage (about 14,000,000 gallons per year) we have approximately 6.1 years of storage life remaining on 4-level. Efforts are being made to update these volume calculations based on a new means of modeling the available storage ponds using a three dimensional CAD program, which provides a much more accurate method to model available and used pond volumes. A summary of the method and associated diagrams will be discussed at the annual meeting.

Action plans are in place to continue to reduce the inflow into the mine. Better management of run-off water from the surface salt storage pads has reduced the volume of water that is processed at the ED plant. This in turn has reduced the volume of water sent to the mine for storage, at a rate of about 3 gpm.

Over the past year inflows in the #1 shaft have slowly increased back to about 23 gpm, this is despite grouting campaign that was completed in May, which achieved no measurable results. Plans are being made to perform grouting campaigns during 2018 in an effort to further reduce the inflows in #1 shaft. Better understanding of the inflows from #2 shaft have led to plans to line the shaft this spring. The total inflow in the shaft, based on water balances, estimates the inflow at 9 gpm. This, in addition to the small amount of seepage in #3 shaft that makes it into the mine at about 1 gpm, brings the total mine inflow to about 36 gpm at this time.

15.a.(7) - Summary of SPDES Monitoring Data:

There was no exceedance of the SPDES limits for the storm water outfalls, and two exceedance for non-contact cooling water temperature at the brine water treatment plant. These were due primarily to the warm summer weather resulting in the intake water being at 75 degrees F, which is above the permitted

discharge temperature. There was one exceedance for the Waste Water Treatment Plant during the past year. The data is included here as an attached spreadsheet. If an exceedance occurs it is reported to the DEC in two ways. Once an exceedance has been identified the DEC is informed via telephone of the occurrence. Each event is also captured in the monthly Report of Non-Compliance, which also lists corrective action taken. The Reports of Exceedance for the three events are attached.

15.b - Notification of Non-routine Mining Incidents:

There were no incidents meeting the guidelines for notification as identified in section 15.a.(2).

15.c - MSHA Correspondence Involving Non-routine Mining Incidents:

The Cayuga Mine has not received any citations or correspondence from MSHA regarding non-routine mining incidents as identified in section 12.a.(2).

15.d. - Changes in Mining Method:

As per discussions with the DEC, and consent of the DEC, in the U-74 mining panel, and subsequent mining panels to the west of NW3, a "large pillar" design has been adopted. This change is necessitated by the potential for disturbed or thin rock overburden in the central portion of the Cayuga Lake valley. These panels were converted to a "large pillar" design which provides better support of the overburden with less changes in the stresses in the strata above the mine. Various progress reports and data regarding that change have been, and will be, sent to the DEC's consultant for his review.

15.e. - Surface Subsidence:

Surface subsidence surveys continue to be done in accordance with the Mined Land Use Plan. See section 15.a.(5) of this report.

15.f. - In-situ Rock Mechanics Measurements:

See section 15.a.(4) of this report.

15.g. - Written Citizen Complaints:

No written complaints from citizens were received since the last report (November 2016).

9.a and b. - "Cargill shall conduct further investigations of the disturbed rock zone..." and "the adequacy of the thin rock overburden...":

Cargill has concluded its investigation of the adequacy of the thin rock overburden at anomaly "C" and has submitted pertinent data and analysis to Dr. Vincent Scovazzo for his review.

Water Volume Calculation Ultimate Pond Potential Volume 1-Nov-17 Proprietary and Confidential						
Area	Total Area	Pillar Area Ft2	Fillable Area Ft2	Roof Height	Volume	Gallons
Far East Pond	6,598,278	2,831,750	3,766,528	12	45,198,336	338,083,553
Overflow Basin	832,750	64,788	767,962	10	7,679,620	57,443,558
Small Pond #2	128,409	0	128,409	7	898,863	6,723,495
Bowl Edge Pond	Not planned					
Small Pond #1	Not planned					
Southern Pond	Not planned					
Total Gallons						402,250,606
Incoming gallons per year @ 40gpm						21,021,000
Ultimate Pond Life (yrs) as of 6 Feb2001						19
Water added = (46 months/12 mo.) X 21,024,000 = (6 Feb 2001 - 1 Jan 2005)						80,592,000
Water added during 2005 (measured)						16,030,800
Water added during 2006 (measured)						18,272,329
Water added during 2007 (measured)						13,507,200
Water added during 2008 (measured)						10,886,400
Water added during 2009 (estimated)						10,401,624
Water added during 2010 (estimated)						8,894,769
Water added during 2011 (estimated)						10,669,680
Water added during 2012 (flow meter)						11,861,287
Water added during 2013 (flow meter)						15,102,252
Water added during 2014 (flow meter)						16,844,053
Water added during 2015 (flow meter)						18,193,910
Water added during 2016 (flow meter)						14,293,130
Water added during 2017 (flow meter)						14,175,877
Mar 2010 Adjustment (Final fill -1520 elevation to -1540 elevation)						55,753,706
Volume remaining						86,771,589
Remaining Pond Life @ 2017 inflow rates.						6.1

Pond volumes are calculated by using the "area" function of Auto Cad. A polygon is drawn around the perimeter of the entire pond and Auto Cad is used to calculate the area of the polygon (in square feet). A polygon is drawn around each individual pillar within the pond limits and an area is calculated using Auto Cad. The pillar area's are subtracted from the total area to give the total pond area. Roof heights are determined by visual inspection, historical information where available, and the use of raw estimates. Water added values are estimates from the mine pumping system flowmeter.

2017 DEC Report Outfall Results (Oct 2016 through Sept 2017)

Red = exceedance

October 2017 not reported at the time of submittal

NF = No Flow

CYANIDE

Acid Disociable Permit Limit Month/Year	001 1.1	002 0.1	003 0.1	004 0.1	005 0.1	006 0.1	007 0.1	008 0.1	012 0.1
OUTFALLS									
October	0.2	0.014	<0.01	Eliminated	Eliminated	NF	0.016	Eliminated	NF
November	0.8	<0.01	<0.01			<0.01	<0.01		<0.01
December 2016	0.068	<0.01	<0.01			0.02	<0.01		<0.01
January 2017	0.19	<0.01	<0.01			<0.01	<0.01		<0.01
February	0.069	<0.01	<0.01			NF	<0.01		<0.01
March	0.16	<0.01	<0.01			NF	<0.01		<0.01
April	0.059	<0.01	<0.01			0.011	<0.01		<0.01
May	0.11	<0.01	<0.01			0.011	<0.01		<0.01
June	0.65	0.011	<0.01			0.011	<0.01		<0.01
July	0.31	0.015	<0.01			NF	<0.01		<0.01
August	0.48	0.011	<0.01			NF	<0.01		<0.01
September	0.52	0.019	<0.01			0.011	0.01		<0.01

CHLORIDE

Permit Limit Month/Year	001 40,000 mg/l	002 10,000 mg/l	003 10,000 mg/l	004 Eliminated	005 Eliminated	006 5,000 mg/l	007 5,000 mg/l	008 Eliminated	012 5,000 mg/l
OUTFALLS									
October	3,600	4,000	980			NF	2,600		NF
November	13,000	3,900	4,100			1,800	1,100		3,600
December 2016	16,000	2,100	910			3,000	360		1,300
January 2017	38,000	3,500	1,600			4,350	540		2,400
February	17,000	2,400	1,000			NF	550		1,800
March	20,000	2,800	900			NF	450		1,200
April	15,000	2,900	930			3,500	280		1,200
May	6,600	2,000	750			2,400	280		1,000
June	25,000	2,200	690			2,200	260		1,200
July	4,200	4,800	630			NF	400		1,600
August	19,000	9,600	560			NF	1,400		1,400
September	30,000	5,600	700			3,200	580		3,700

TDS

Permit Limit Month/Year	001 80,000 mg/l	002 40,000 mg/l	003 40,000 mg/l	004 Eliminated	005 Eliminated	006 10,000 mg/l	007 10,000 mg/l	008 Eliminated	012 10,000 mg/l
OUTFALLS									
October	32,000	7,500	2,500			NF	5,100		NF
November	21,000	6,100	6,500			2,900	2,000		5,800
December 2016	21,000	3,700	2,400			4,600	800		2,600
January 2017	41,000	5,500	2,800			6,600	950		3,400
February	28,000	4,600	2,600			NF	1,100		3,400
March	33,000	5,200	2,300			NF	1,100		2,500
April	28,000	5,200	2,300			5,300	830		2,400
May	11,000	3,500	2,200			4,100	910		1,900
June	42,000	4,100	2,200			4,000	830		2,300
July	44,000	4,500	1,900			NF	1,100		2,900
August	35,000	16,000	2,100			NF	2,500		2,500
September	47,000	8,800	2,100			5,200	1,600		5,900

OUTFALL

Permit Limit	001 20 mg/l
Month/Year	
October	ND
November	ND
December 2016	ND
January 2017	0.034
February	0.087
March	0.4
April	0.4
May	0.1
June	0.4
July	0.4
August	0.4
September	0.4

NON CONTACT COOLING WATER

Min/Max Intake Water Temp, deg. F.	Min/75 Max Effluent Water Temp, deg. F	500 Max Gpm. Flow Rate Effluent Gross
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Month/Year					
October	55.2/62.8		57.7/65.6		259
November	45.5/54.3		50.0/56.1		233
December 2016	43.1/46.3		47.9/49.9		233
January 2017	41.4/44.3		49.9/51		187
February	40.0/45.7		51.2/51.5		129
March	38/38.7		42.8/47.5		233
April	40.3/46.1		48.7/51.1		227
May	44.8/54.4		50.5/5.3		237.61
June	50.1/63.3		51.2/63.5		238
July	69.5/76/8		70.4/77.4		240
August	69.7/75.5		72.6/76.5		170.11
September	66.3/71.4		68.4/72.4		177

WASTE WATER TREATMENT PLANT

WASTE WATER TREATMENT PLANT					Outfall #009						
Item	Flow Rate Avg Gal / day	BOD		pH		Total Suspended Solids		Settleable Solids Daily max	Total Residual Chlorine Max Daily Avg	Fecal Coliform # per 100 ml	
		Avg 30 Day	Max 7 Day	Min	Max	Avg 30 Day	Max 7 Day			Avg 30 Day	Max 7 Day
Permit Limit	Report	30	45	6	9	30	45	3.0 ml/l	1.0 mg/l	Report	Report
Month/Year											
October	532	2.0	2.0	6.7	7.4	15	15	<0.1	0.6	0	0
November	532	2.0	2.0	6.5	7.1	2	2	<0.1	0.5	0	0
December 2016	532	4.5	4.5	6.1	8.8	8	8	<0.1	0.3	0	0
January 2017	654	28	28	7.8	8.2	3	3	<0.1	0.6	0	0
February	654	10.5	10.5	7.3	8.2	25	25	<0.1	0.6	0	0
March	653	15	15	6.9	7.6	21	21	<0.1	0.5	0	0
April	460	3.0	3.0	7	7.2	25	25	<0.1	0.5	23	23
May	460	6.3	6.3	7	7.5	7	7	<0.1	0.21	28	28
June	460	12.3	12.3	7	8.1	17	17	<0.1	0.47	4	4
July	550	4.0	4.0	7.6	7.9	4	4	<0.1	0.7	2	2
August	550	3	3	7.2	7.9	10	10	<0.1	0.47	2	2
September	550	9	9	6.8	7.8	14	14	<0.1	0.75	600	600

Appendix B

SECTION 1



New York State Department of Environmental Conservation
Division of Water



Report of Noncompliance Event

To: DEC Water Contact Matt Russo DEC Region: 7

Report Type: 5 Day ☒ Permit Violation ☐ Order Violation ☐ Anticipated Noncompliance ☐ Bypass/Overflow ☐ Other

SECTION 2

SPDES #: NY-0101290 Facility: Cargill Inc. - Cayuga Mine

Date of noncompliance: August 2017 Location (Outfall, Treatment Unit, or Pump Station): outfall # 14 (014-M)

Description of noncompliance(s) and cause(s): During the month of August, the non-contact cooling water loop at outfall #14 was intaking water warmer than what we are permitted to discharge. Our permit allows us to discharge water up to 75 degrees Fahrenheit. We found that we were discharging water between 72.6 and 76.5 degrees Fahrenheit during the month of August. Our intake water was between 69.7 and 75.5 degrees Fahrenheit during the month of August. We believe the summer heat has caused water temperatures to rise during the month. This condition is out of our control.

Has event ceased? ☒ (Yes) (No) If so, when? (At the end of the month) Was event due to plant upset? (Yes) ☒ (No) SPDES limits violated? ☒ (Yes) (No)

Start date, time of event: 8/20/17 ☒ (AM) (PM) End date, time of event: 8/20/17 ☒ (AM) (PM) Date, time oral notification made to DEC? 9/8/17, 3:05 AM ☒ (PM) DEC Official contacted: Matt Russo Region 7 NYSDEC

Immediate corrective actions: Once we found that the discharge temperature was above our permitted level we immediately investigated and notified the DEC.

Preventive (long term) corrective actions:

Continue to monitor lake temperatures and notify the DEC of any abnormal conditions.

SECTION 3

Complete this section if event was a bypass:

Bypass amount: _____ Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: _____ Date of DEC approval: ____/____/____

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4

Facility Representative: Marty Christofferson Title: EHS Professional Date: 9/8/2017

Phone #: (607) 533 3815 Fax #: (607) 533 4501

I Certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

X

Signature of Principal Executive
Officer or Authorized Agent

INSTRUCTIONS

The Division of Water developed this standardized form to simplify the reporting of noncompliance events. The SPDES Permit General Conditions, require that certain discharges of untreated or partially treated sewage must be reported orally within either 2 hours¹ or 24 hours and also in writing within five (5) days as required by the appropriate regulation. All other permit noncompliance shall be reported as attachments to the Discharge Monitoring Report (DMR). This form should be used for these events as well as to report noncompliance relating to consent orders, scheduled events and bypass events.

All necessary information can readily be reported to DEC on this form. Additional information required to describe the event can be attached. Please make additional copies of this form and use as needed. Instructions are provided below. For questions on form use please contact the appropriate office listed below for the county where your permitted facility is located. Thank you for your cooperation.

Instructions to complete and submit Noncompliance Report

1. Provide facility information and all applicable event details in Sections 1 through 3. Dates should be completed in month/day/year format.

2. Provide your name, title, business phone number, and date report was completed in Section 4. Use additional sheets as needed to provide full detail of the event in Section 2.

3. For 5-day written reports, mail or fax the completed form to the appropriate DEC Regional Office listed below. Attach all other noncompliance reports to the DMR submittal (be sure to attach to each set of DMR copies) or mail separately if related to consent order/scheduled event noncompliance. After hours and weekend reporting of unusual discharge events of other noncompliance must be reported through the DEC Telephone Hotline, which is 1-800-457-7362.

DEC Regional Offices:

<u>REGION 1</u> Regional Water Engineer NYS SUNY, Bldg. 40 Loop Road Stony Brook, NY 11790-2356 Phone: 631-444-0405 Fax: 631-444-0373 Counties: Nassau Suffolk	<u>REGION 2</u> Regional Water Engineer One Hunters Point Plaza 47-40 21st St. Long Island City, NY 11101-5407 Phone: 718-482-4900 Fax: 718-482-6516 Counties: New York Queens Bronx Richmond Kings	<u>REGION 3 **</u> Regional Water Engineer 21 So. Putt Corners Rd New Paltz, NY 12561-1696 Phone: 845-256-3000 Fax: 845-255-0714 Counties: Sullivan Putnam Rockland Dutchess Orange Ulster Westchester
<u>REGION 4</u> Regional Water Engineer 1150 North Westcott Rd. Schenectady, NY 12306-2014 Phone: 518-357-2045 Fax: 518-357-2398 Counties: Schenectady Montgomery Albany Otsego Rensselaer Columbia Delaware Schoharie Greene	<u>REGION 5 **</u> Regional Water Engineer Route 86, P.O. Box 296 Ray Brook N.Y. 12977-0296 Phone: 518-897-1241 Fax: 518-897-1245 Counties: Fulton Clinton Essex Hamilton Saratoga Franklin Washington Warren	<u>REGION 6 **</u> Regional Water Engineer Region 6 Suboffice State Office Bldg. 207 Genesee St. Utica, NY 13500 Phone: 315-793-2554 Fax: 315-793-2748 Counties: Herkimer Oneida Lewis Jefferson St. Lawrence
<u>REGION 7</u> Regional Water Engineer 615 Erie Blvd West Syracuse, NY 13204-2400 Phone: 315-426-7506 Fax: 315-426-7402 Counties: Cortland Chenango Madison Tioga Cayuga Oswego Tompkins	<u>REGION 8</u> Regional Water Engineer 6274 East Avon-Lima Rd Avon, NY 14414-9519 Phone: 585-226-2466 Fax: 585-226-2830 Counties: Livingston Monroe Orleans Schuyler Chemung Seneca Steuben Ontario Wayne Yates	<u>REGION 9</u> Regional Water Engineer 270 Michigan Avenue Buffalo, NY 14203-2999 Phone: 716-851-7070 Fax: 716-851-7009 Counties: Chautauqua Allegany Erie Niagara Wyoming

**** REGION 3 Suboffice**
Regional Water Staff
200 White Plains Rd., 5th Floor
Tarrytown, NY 10591-5805
Phone: 914-332-1835
Fax: 914-332-4670

REGION 5 Suboffice
Regional Water Staff
Box 220, Hudson St Extension
Warrensburg, NY 12885-0220
Phone: 518-623-1200
Fax: 518-623-4193

REGION 6 Suboffice
Regional Water Staff
317 Washington St.
Watertown, NY 13601-3787
Phone: 315-785-2513
Fax: 315-785-2422

¹ This requirement reflects proposed pending regulations.

Appendix B

SECTION 1



New York State Department of Environmental Conservation
Division of Water



Report of Noncompliance Event

To: DEC Water Contact Matt Russo DEC Region: 7

Report Type: 5 Day ☒ Permit Violation ☐ Order Violation ☐ Anticipated Noncompliance ☐ Bypass/Overflow ☐ Other

SECTION 2

SPDES #: NY-0101290 Facility: Cargill Inc. – Cayuga Mine

Date of noncompliance: July 2017 Location (Outfall, Treatment Unit, or Pump Station): outfall # 14 (014-M)

Description of noncompliance(s) and cause(s): During the month of July, the non-contact cooling water loop at outfall #14 was intaking water warmer than what we are permitted to discharge. Our permit allows us to discharge water up to 75 degrees Fahrenheit. We found that we were discharging water between 70.4 and 77.4 degrees Fahrenheit during the month of July. Our intake water was between 69.5 and 76.8 degrees Fahrenheit during the month of July. We believe the summer heat has caused water temperatures to rise during the month. This condition is out of our control.

Has event ceased? (Yes) ☒ (No) ☐ If so, when? _____ Was event due to plant upset? (Yes) ☒ (No) ☐ SPDES limits violated? ☒ (Yes) ☐ (No)

Start date, time of event: 7/20/17 ☒ (AM) ☐ (PM) End date, time of event: _____ (AM) (PM) Date, time oral notification made to DEC? 8/11/17, 2:11 ☒ (AM) ☐ (PM) DEC Official contacted: Matt Russo Region 7 NYSDEC

Immediate corrective actions: Once we found that the discharge temperature was above our permitted level we immediately investigated and notified the DEC.

Preventive (long term) corrective actions:

Continue to monitor lake temperatures and notify the DEC of any abnormal conditions

SECTION 3

Complete this section if event was a bypass:

Bypass amount: _____ Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: _____ Date of DEC approval: ____ / ____ / ____

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4

Facility Representative: Marty Christofferson Title: EHS Professional Date: 8/11/2017

Phone #: (607) 533 3815 Fax #: (607) 533 4501

I Certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Principal Executive
Officer or Authorized Agent

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2. Provide your name, title, business phone number, and date report was completed in Section 4. Use additional sheets as needed to provide full detail of the event in Section 2.
3. For 5-day written reports, mail or fax the completed form to the appropriate DEC Regional Office listed below. Attach all other noncompliance reports to the DMR submittal (be sure to attach to each set of DMR copies) or mail separately if related to consent order/scheduled event noncompliance. After hours and weekend reporting of unusual discharge events of other noncompliance must be reported through the DEC Telephone Hotline, which is 1-800-457-7362.

DEC Regional Offices:

<u>REGION 1</u> Regional Water Engineer NYS SUNY , Bldg. 40 Loop Road Stony Brook, NY 11790-2356 Phone: 631-444-0405 Fax: 631-444-0373 Counties: Nassau Suffolk	<u>REGION 2</u> Regional Water Engineer One Hunters Point Plaza 47-40 21st St. Long Island City, NY 11101-5407 Phone: 718-482-4900 Fax: 718-482-6516 Counties: New York Queens Bronx Richmond Kings	<u>REGION 3 **</u> Regional Water Engineer 21 So. Putt Corners Rd New Paltz, NY 12561-1696 Phone: 845-256-3000 Fax: 845-255-0714 Counties: Sullivan Putnam Rockland Dutchess Orange Ulster Westchester
<u>REGION 4</u> Regional Water Engineer 1150 North Westcott Rd. Schenectady, NY 12306-2014 Phone: 518-357-2045 Fax: 518-357-2398 Counties: Delaware Otsego Schenectady Schoharie Montgomery Albany Columbia Greene	<u>REGION 5 **</u> Regional Water Engineer Route 86, P.O. Box 296 Ray Brook N.Y. 12977-0296 Phone: 518-897-1241 Fax: 518-897-1245 Counties: Fulton Clinton Hamilton Essex Saratoga Washington Warren	<u>REGION 6 **</u> Regional Water Engineer Region 6 Suboffice State Office Bldg. 207 Genesee St. Utica, NY 13500 Phone: 315-793-2554 Fax: 315-793-2748 Counties: Herkimer Lewis Oneida Jefferson St. Lawrence
<u>REGION 7</u> Regional Water Engineer 615 Erie Blvd West Syracuse, NY 13204-2400 Phone: 315-426-7506 Fax: 315-426-7402 Counties: Chenango Cortland Madison Onondaga Cayuga Oswego Tompkins	<u>REGION 8</u> Regional Water Engineer 6274 East Avon-Lima Rd Avon, NY 14414-9519 Phone: 585-226-2466 Fax: 585-226-2830 Counties: Livingston Monroe Orleans Schuyler Genesee Seneca Ontario Yates	<u>REGION 9</u> Regional Water Engineer 270 Michigan Avenue Buffalo, NY 14203-2999 Phone: 716-851-7070 Fax: 716-851-7009 Counties: Chautauqua Allegany Cattaraugus Erie Niagara Wyoming

**** REGION 3 Suboffice**
Regional Water Staff
200 White Plains Rd., 5th Floor
Tarrytown, NY 10591-5805
Phone: 914-332-1835
Fax: 914-332-4670

REGION 5 Suboffice
Regional Water Staff
Box 220, Hudson St Extension
Warrensburg, NY 12885-0220
Phone: 518-623-1200
Fax: 518-623-4193

REGION 6 Suboffice
Regional Water Staff
317 Washington St.
Watertown, NY 13601-3787
Phone: 315-785-2513
Fax: 315-785-2422

¹ This requirement reflects proposed pending regulations.

Appendix B

SECTION 1



New York State Department of Environmental Conservation
Division of Water



Report of Noncompliance Event

To: DEC Water Contact _____ DEC Region: _____

Report Type: ☐ 5 Day ☒ Permit Violation ☐ Order Violation ☐ Anticipated Noncompliance ☐ Bypass/Overflow ☐ Other

SECTION 2

SPDES #: NY- 0101290 Facility: CARGILL INC- CATUGA MINE

Date of noncompliance: 09 / 17 Location (Outfall, Treatment Unit, or Pump Station): OUTFALL

Description of noncompliance(s) and cause(s): FECAL OVER LIMIT, CRACKED SUCTION LINE ON CHLORINE FEED PUMP

Has event ceased? (Yes) ☒ (No) ☐ If so, when? 9/22/17 Was event due to plant upset? (Yes) ☒ (No) ☐ SPDES limits violated? (Yes) ☒ (No) ☐

Start date, time of event: ____ / ____ / ____, ____ : ____ (AM) (PM) End date, time of event: ____ / ____ / ____, ____ : ____ (AM) (PM)

Date, time oral notification made to DEC? ____ / ____ / ____, ____ : ____ (AM) (PM) DEC Official contacted: _____

Immediate corrective actions: REPLACE CHLORINE PUMP LINES

Preventive (long term) corrective actions: _____

SECTION 3

Complete this section if event was a bypass:

Bypass amount: _____ Was prior DEC authorization received for this event? (Yes) (No)

DEC Official contacted: _____ Date of DEC approval: ____ / ____ / ____

Describe event in "Description of noncompliance and cause" area in Section 2. Detail the start and end dates and times in Section 2 also.

SECTION 4

Facility Representative: John McGrath Title: operator Date: 10 / 13 / 17

Phone #: (607) 273-4461 Fax #: () -

I Certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Principal Executive
Officer or Authorized Agent

INSTRUCTIONS

The Division of Water developed this standardized form to simplify the reporting of noncompliance events. The SPDES Permit General Conditions, require that certain discharges of untreated or partially treated sewage must be reported orally within either 2 hours¹ or 24 hours and also in writing within five (5) days as required by the appropriate regulation. All other permit noncompliance shall be reported as attachments to the Discharge Monitoring Report (DMR). This form should be used for these events as well as to report noncompliance relating to consent orders, scheduled events and bypass events.

All necessary information can readily be reported to DEC on this form. Additional information required to describe the event can be attached. **Please make additional copies of this form and use as needed.** Instructions are provided below. For questions on form use please contact the appropriate office listed below for the county where your permitted facility is located. Thank you for your cooperation.

Instructions to complete and submit Noncompliance Report

1. Provide facility information and all applicable event details in Sections 1 through 3. Dates should be completed in month/day/year format.
2. Provide your name, title, business phone number, and date report was completed in Section 4. Use additional sheets as needed to provide full detail of the event in Section 2.
3. For 5-day written reports, mail or fax the completed form to the appropriate DEC Regional Office listed below. Attach all other noncompliance reports to the DMR submittal (be sure to attach to each set of DMR copies) or mail separately if related to consent order/scheduled event noncompliance. After hours and weekend reporting of unusual discharge events of other noncompliance must be reported through the DEC Telephone Hotline, which is 1-800-457-7362.

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