

New York State Department of Environmental Conservation

M E M O R A N D U M

TO: File #7093-29-0052, Cargill Inc. JM
FROM: Joe Moskiewicz
SUBJECT: Cargill Inc. Compliance Inspection on February 21, 1980
DATE: February 27, 1980

Inspection was conducted at the Lansing facility with Dale Vollmer of the Water Quality section regarding sodium chloride and cyanide discharges apparently in excess of those levels permitted in the SPDES permit.

This violation is a violation of the Mining Permit #00566 and Part 422.2 (c) (3) (v) (b) of 6 NYCRR: "minerals stored or stockpiled within the permit area shall be temporarily treated to prevent their becoming unstable, hazardous, a source of pollution of the environment, or damaging to other property".

Dale Vollmer will notify the permittee of the alleged violation and should also include the applicant's right to request a hearing pursuant to Part 426 of 6 NYCRR regarding the imposition of penalties.

The permittee should also be notified that in addition to refusal to renew, suspension or revocation of the mining permit, the Department may assess a civil penalty of not more than \$1,000 for each act or omission constituting a violation for each day the violation continues.

cc: Dale Vollmer
Lee Flocke
Breck Trautwein

Bill Hicks
Joe Moskiewicz
Monthly Report - February 1980

February 27, 1980

I. Mined Land Reclamation

Cargill Salt, Inc.

This extremely mild winter has combined with failing or inadequate storage facilities at this mine in Tompkins County to cause a water quality problem of significant magnitude. Virtually no salt has been sold this year for snow and ice control and all storage facilities are filled to capacity. Recent reports to the Water Quality Section indicate discharges into Cayuga Lake of 84,253 mg/l of total dissolved solids, 32 mg/l of cyanide, 49,400 mg/l of chlorides. Allowable limits under the SPDES permit are 1,000 mg/l of total dissolved solids, 0.4 mg/l of cyanide, 205 mg/l of chlorides.

Remedial action and punitive considerations by Environmental Quality are being supported by this unit as discharges of this kind violate the Mining Permit as well as the SPDES permit.

Allied Chemical, Inc.

The final environmental impact statement concerning Jamesville Quarry expansion into the Town of Manlius has been accepted by the Town of Manlius as lead agent.

This office is reviewing this action as it will require a modification of DEC's mining permit. DEC staff has spent an enormous amount of technical review time during the past year on the draft EIS. Significant input has been made by the Bureaus of Minerals and Noise in Albany regarding quarry noise and vibration from blasting. Regional staff have made contributions regarding air and groundwater quality, wildlife impacts, and reclamation proposals.

The key issues focus on the intense discord resulting from the encroachment of industrial land use on residential land use. Mitigating measures and permit considerations are aimed at minimizing this conflict as much as possible.

Cargill, Inc.
Salt Division
March 20, 1980

FRED CHART
BESSEMER 2-42
GILGEG TRAVIS

LEE FLOORE
DALE VANCE
DICK BLICKWEDDE

AGENDA

1.) Past History

- a. Besemer Quarry Site
- b. Main Site

2.) Effluent Limitation Violations - *SINCE PERMIT - 3 OUTFALLS*
Discharge Monitoring Report Summary

3.) Unpermitted Outfalls

4.) Needed Actions

- a. Repairs to existing salt storage pads - *SEAL LOGES NOW - THIS SPRING*
- b. Expanded sampling program: *2 week concentrated study - then a regular program*
- c. Study of various sources of contamination by a consulting engineer including at a minimum:
 - 1.) Storage areas
 - 2.) Loading & transfer operations
 - 3.) General housekeeping methods
 - 4.) Salt storage at Portland cement site
- d. Recommendations from your consultant on various alternatives to bring all discharges into compliance with the effluent limitations. Alternatives should include at a minimum:
 - 1.) On-site runoff contamination control
 - 2.) Deep well disposal of all runoff
 - ~~3.) Runoff collection, treatment and surface discharge~~

5.) DEC policies

6.) DEC Required Commitments by Cargill, Inc.

- 1.) Retain a consulting engineer to prepare a technical report on items 4 and 5 above to be submitted by July 1, 1980 for approval by DEC.
- 2.) Implementation of the consultant's recommendations in accordance with a reasonable timetable to be established and formalized in a consent agreement after the consultant's recommendations are finalized.

Cargill Salt Discharge Monitoring Report Summary

Date	<u>Outfall 001</u>				<u>Outfall 002</u>			
	<u>Chlorides</u> <u>mg/l</u>	<u>TDS</u> <u>mg/l</u>	<u>CN</u> <u>mg/l</u>	<u>pH</u>	<u>Chlorides</u> <u>mg/l</u>	<u>TDS</u> <u>mg/l</u>	<u>CN</u> <u>mg/l</u>	<u>pH</u>
Permit Limits	250 max.	1,000 max.	0.4 avg. 0.4 max.	6.5 min. 8.5 max.	250 max.	1,000 max.	0.4 avg. 0.4 max.	6.5 min. 8.5 max.
August 1977	41,996			8.0	1,739			7.5
September 1977	33,083	50,191	17.5	8.2	2,059	4,087	0.18	8.0
October 1977	26,695	46,000	22.5	8.4	1,526	16,281	0.17	8.2
Nov. 1977	40,753	8,393	7.0	8.2	4,294	9,799	0.02	8.0
Dec. 1977	11,218	20,499	1.48		1,846	4,699	0.04	7.5
Jan. 1978	No Report							
Feb. 1978	9,939	17,699	0.69	7.2	No Flow			
March 1978	11,430	26,478	1.29	7.2	3,123	6,100	0.06	7.0
April 1978	No Report							
May 1978	1,915	4,297	0.32	8.0	1,029	3,100	0.04	7.4
June 1978	16,968	35,100	0.05	7.3	5,644	11,300	0.02	7.7
July 1978	11,749	21,054	0.68	7.1	1,770	4,411	0.08	7.3
August 1978	19,170	34,335	0	7.4	3,550	8,717	0	7.5
September 1978	No Report							
October 1978	10,178	27,407	1.2	7.4	5,199	--	0	7.6
Nov. 1978	No Report							
Dec. 1978	14,218	24,891	2.6	7.4	1,810	4,562	0	7.1
January 1979	12,780	22,618	2.0	7.6	2,438	5,574	0.73	7.4
Feb.-April 1979	4,060	8,315	0.61	7.6	9,008	12,804	0.63	7.9
May-July 1979	22,820	39,150	8.13	7.5	2,193	5,024	0.12	7.9
Aug.-October 1979	32,903	74,826	26.8	7.6	3,933	9,173	0.11	7.4
Nov.-January 1980	84,253	49,416	22.8	7.5	2,556	53,760	4.7	7.8

Region 7, Environmental Quality Office
7481 Henry Clay Boulevard, Liverpool, New York 13088

(315) 473-8311

March 31, 1980

Cargill, Inc.
Salt Division
191 Portland Point Road
Lansing, New York 13126

Attn: Mr. C.E. Bednarczyk
Regional Operations Manager

Re: Cayuga Rock Salt Mine
Lansing (T), Tompkins County
State Pollutant Discharge Elimination
System (SPDES) Permit #NY-0101290

Dear Mr. Bednarczyk:

Thank you for the opportunity to meet with Mr. Croft, your consultant Greg Travis, and yourself on March 20, 1980 to discuss the water pollution problems at your facility.

This letter is to confirm the major points of discussion and the commitments made at that meeting. The monitoring required by your State Pollutant Discharge Elimination System (SPDES) Permit began in 1977. The values reported to us in your Discharge Monitoring Reports have indicated that your discharges from outfalls 001 and 002 have consistently been significantly in excess of the maximum allowable discharges. A summary of the reported values is attached for your information.

Discharge 001 carries run-off from the area of the salt storage pads built in 1977 and 1979. Discharge 002 carries run-off from the area around the existing storage buildings. In addition to these outfalls there are a number of other storm water discharges from the site located south of outfall 002. These outfalls are not presently included in your SPDES permit.

It was agreed that the following courses of action will be taken in an effort to bring your facility into compliance with the requirements of the SPDES Permit:

1. Repairs to the existing salt storage pads will be undertaken. The sealing of the ditch around the upper salt storage pad and covering of the salt pile with a new tarp will be completed within the next few weeks. Replacement of the base of the pad will be completed prior to stockpiling for the 1981-82 winter

season. Regarding the lower pad, repairs will be made to the subsiding area before stockpiling.

2. A two-week concentrated sampling study will be undertaken immediately to determine which of the permitted outfalls are contaminated from Cargill operations. The outfalls that are found to be contaminated will have to be included in your SPDES permit. An application form is attached for your use.
3. A study will be undertaken by your consulting engineer to determine the various sources of contamination including at a minimum:
 - a.) the salt storage areas including the buildings
 - b.) loading and transfer operations
 - c.) general housekeeping methods and,
 - d.) an evaluation of the salt storage area at the Portland Cement Plant site.
4. As a result of the study undertaken by your consultant, an engineering report shall be prepared for submittal to this Department for approval by July 1, 1980. The engineering report should include a comprehensive description of the wastewater problems and a thorough evaluation of various alternatives to bring the wastewater discharge into compliance with the SPDES permit effluent limitations. As discussed at the meeting, alternatives that should be evaluated in your report should include minimization of run-off contamination through improved operations, run-off minimization by diversion, deep well disposal of run-off either on-site or at the Watkins Glen facility and elimination or centralization of outfalls.

The report should clearly specify which of the alternates will be implemented by Cargill Salt. A reasonable timetable will be established and formalized in a consent agreement after the consultant's recommendations are finalized.

Your cooperation in this matter is greatly appreciated. However, the fact that your facility is presently not in compliance with the effluent limitations of your State Pollutant Discharge Elimination System Permit cannot be forgotten. In the event that the above commitments are not carried out in a satisfactory fashion, we intend to seek penalties of up to \$10,000 per day for these violations.

March 31, 1980

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If you have any questions or would like to discuss any of the above, please feel free to contact this office.

Very truly yours,

Leland C. Flocke, P.E.
Regional Water Pollution Control Engineer

cc: Tompkins County Health Dept.
Mr. Loveridge
Mr. Travis
Mr. Moskiewicz
Mr. Brickwedde