



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

August 10, 2010

Mr. Rod Good
R. Good Enterprises
7076 North Main St
Camden, OH 45311

Mr. Tom Peterson
President and General Manager
Central Salt L.L.C./Envirotech Central L.L.C.
385 Airport Road-Suite 108
Elgin, IL 60123

Mr. Gary Rimmey
Environmental Manager
Cargill Salt
PO Box 5621
Minneapolis, MN 55440

**Re: Discharge of Pollutants to Waters of the State from Salt Piles at Camden,
Ohio, Notice of Violation.**

Gentlemen:

Cargill Salt and Central Salt own large piles of salt stored at R. Good Enterprises site at 7076 North Main St, Camden, Ohio, (The Camden site). R. Good Enterprises is the handler for both salt piles at this location. Cargill Salt and Central Salt are responsible for the covering of their respective piles at the Camden site.

As you all know from our conversations the week of August 2, 2010, data are showing that the Village of Camden potable water well #2 is experiencing increasing levels of sodium, chloride and total dissolved solids starting in October 2009. As of August 3, 2010 the raw water now also has a salty taste. In addition, the storm drain pipe we believe was installed by Mr. Good at the beginning of 2010 from the R. Good Enterprises site has been found to be discharging salty water to a ditch within 200 feet of Camden's well # 3.

Storage of large amounts of road salt at the Camden site has resulted in enough salt water infiltration to constitute discharge of pollutants to waters of the state. This occurred initially via the two drywells on the site (since removed), via soaking into the ground and, since February 2010, via the storm drain pipe discharge to the ditch adjacent to the wells.

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Waters of the state are defined at Ohio Revised Code 6111.01(H) to include "...accumulations of water, surface and underground, natural or artificial, regardless of the depth of the strata in which underground water is located, that are situated wholly or partly within, or border upon, this state..." Discharge of pollutants into waters of the state without a valid permit is in violation of Ohio Revised Code 6111.04 (A). That provision states:

- (1) No person shall cause pollution or place or cause to be placed any sewage, sludge, sludge materials, industrial waste, or other wastes in a location where they cause pollution of any waters of the state.
- (2) Such an action prohibited under division (A)(1) of this section is hereby declared to be a public nuisance.

Divisions (A)(1) and (2) of this section do not apply if the person causing pollution or placing or causing to be placed wastes in a location in which they cause pollution of any waters of the state holds a valid, unexpired permit, or renewal of a permit, governing the causing or placement as provided in sections 6111.01 to 6111.08 of the Revised Code, or if the person's application for renewal of such a permit is pending.

No party has obtained a permit or qualified for a permit by rule that would authorize a discharge to waters of the state at the Camden site. The dry wells that were originally installed there are considered unpermitted Class V injection wells under the UIC program. Further, no person has applied for nor obtained an NPDES discharge for discharges to surface waters of the state.

Mr. Good notified me that he blocked the storm drain inlets at the salt pile storage area on August 3, 2010 and plugged the discharge end of the storm drain line on August 5, 2010.

Cargill Salt, Central Salt, and R. Good Logistics must continue to take steps to eliminate further discharges of salty runoff to waters of the state from the Camden site. At a minimum, these steps should include maintaining the covers on the piles of salt currently on site, ensuring no runoff at the site enters the drains leading to the storm pipe, and making arrangements to capture and store or haul off site any salt contaminated water that accumulates after rain or snow melt.

Ohio EPA recommends that a qualified environmental consultant be retained who can assist in determining the rate and extent of groundwater contamination that has emanated from the salt piles. This should be done as soon as possible to enable the Village of Camden to make informed decisions about the operation of their well field.

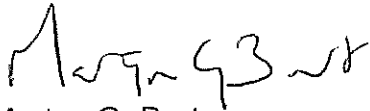
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Once the consultant is retained, they should promptly contact Ohio EPA so that we may communicate our expectations on how to proceed on a technical level and coordinate future communications. I have attached some initial guidance on the type of investigation expected.

Cargill Salt, Central Salt and R. Good Enterprises are each asked to respond to me in writing by Friday September 10, 2010 describing the measures taken and proposed to eliminate the discharge of salt water to all waters of the state, both surface water and ground water from the Camden site. This description should include the schedule by which the measures will be taken.

Please be aware that violations of Ohio Revised Code 6111.04 may be subject to further enforcement.

Sincerely,



Martyn G. Burt
Environmental Supervisor
Division of Surface Water-SWDO

MGB/kla

cc: Sylvanis Gunter, Mayor, Village of Camden
ec: Mike Baker, Chief, DDAGW, Ohio EPA
Bill Fischbein, Water Supervising Attorney, Ohio EPA
Mike Proffitt, Environmental Manager DDAGW-SWDO, Ohio EPA
Jeff Davidson, Manager, DDAGW-SWDO, Ohio EPA