INSPECTION REPORT

Inspection Entry Date/Time	April 11, 2025, 8:30 a.m. (EST)	Announced: No
Inspection Exit Date/Time	April 11, 2025, 11:51 p.m. (EST)	Access: Granted
Weather	Cloudy	
Media	Water	
Statute(s)/Program(s)	Clean Water Act, National Pollutant Discharge Elimination System (NPDES) permit program	
Type of Inspection	Industrial Stormwater Inspection (ISI)	
Permittee Name	Mondelēz Global LLC	
Facility or Site Name	Mondelēz Toledo Ohio Facility (fka Kraft Foods Global Inc)	
Facility/Site Physical Address	2221 Front St	
City, State, Zip Code	Toledo, Ohio 43605	
County/Borough/Parish	Lucas	
Facility GPS Coordinates		
Mailing Address (If different)	nicholas.patterson@mdlz.com	
FRS ID		
Permit Number(s) (If Applicable)	OHU000055	
SIC and/or NAICS	2041	
Lead Inspector:		
William Jones WILLIAM JONES Digitally signed by WILLIAM JONES Date: 2025.06.16 14:55:18 -05'00'		
	EPA REGION 5	Jones.William@epa.gov (312) 886-6058
Supervisor Review:		
Molly Smith MOLLY SMITH Digitally signed by MOLLY SMITH Date: 2025.06.16 16:31:36 -05'00'		
	EPA REGION 5	Smith.Molly@epa.gov

SECTION I – INTRODUCTION

Site Entry and Inspection Objectives

EPA Region 5 Lead Inspector, William Jones, arrived at Mondelēz Toledo Ohio Facility (the "Site" or "Facility"), located at the address listed above which is located close to the Maumee River in Toledo, Ohio at 8:30 a.m. EST on April 11, 2025, for an unannounced inspection. EPA Region 5 Lead Inspector presented credentials to Nicolas Patterson and informed him that this was an EPA Region 5 inspection to investigate, as authorized by Clean Water Act (CWA) Section 308 and implementing regulations, including the Facility's industrial storm water permit. This report is based on information supplied by Mondelēz Global LLC representatives, direct

observations made by EPA Region 5 inspectors, records and reports maintained by the permittee and other information including: photographs taken by EPA Region 5 inspectors, verbal or written statements made by information supplied by Mondelēz Global LLC representatives during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA Region 5 inspectors by Mondelēz Global LLC representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or after the Inspection from a review of US Environmental Protection Agency (EPA), state, and/or public records may be included in this report.

Attendees

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA Region 5	William Jones	Lead Inspector	Yes	Yes
EPA Region 5	Jeremy Leggett	Physical Scientist	Yes	Yes
Mondelēz Global LLC	Nicholas Patterson (nicholas.patterson@mdlz.com)	Senior Health and Safety Environmental Specialist	Yes	Yes
Mondelēz Global LLC	Trevor Parks (trevor.parks@mdlz.com	Health and Safety Environmental Specialist	Yes	Yes

Facility/Site Description

EPA Region 5 lead inspector confirmed the following facility information:

Mondelēz Toledo Ohio Facility is owned by Mondelēz Global LLC. Mondelēz Toledo Ohio Facility is a flour mill. The Facility uses wheat berries (Grain) to produce flour. On September 12, 2022 and July 22, 2024, the Ohio Environmental Protection Agency (Ohio EPA) approved coverage under general storm water industrial permit OHR000007 for Kraft Foods Global Inc at 2221 Front Street in Toledo, Ohio, with a permit effective date of September 12, 2022, and August 1, 2024, respectively. The expiration date is May 31, 2027. The letters were sent to Reid Kersey at Mondelēz Global LLC.

Facility/Site Information

Location(s)

Location/Area/Sub-area	Description
Hopper cars area	Area where hopper cars are on site and nearby storm sewer inlets and outfall.
Dock area	Area where barges are received with grain
Area near scales	Area where truck scales area and nearby storm drain inlets

Nicholas Patterson stated the Facility employs about 93 employees, and mostly run 24-hours a day, seven days a week. Mr. Patterson stated the Facility gets wheat berries and produce flour and ships out via truck and rail. The Facility receives the wheat berries by truck, barge and rail. Mr. Patterson does the monthly stormwater inspections and CT consultants do the sampling. US EPA requested a copy of the Facility's Storm Water Pollution Prevention Plan (SWPPP), but Mr. Patterson required US EPA to request copies of all compliance documents in

writing. The Facility reported quarterly benchmark monitoring exceedances from fourth quarter of 2022 through third quarter of 2024. The Facility has two cyclonic separators for stormwater. Mondelēz uses diesel fuel (approximately 15,000 gallons of storage), food grade oil, and fumigants. Crown does the preventative maintenance for Mondelēz's forklifts. Plymouth does the maintenance on the diesel locomotives. Mr. Patterson said that there have been no spills onsite since he has been here. The Facility has five outfalls, four of which the Facility collects samples from. The Facility uses a basket and a sock. In 2024 three additional socks were installed to bring the total number installed to six. US EPA viewed photos of containers the Facility uses to take visual observation samples from. Mr. Patterson said that every drain gets vacuumed out annually. The Facility also has two cyclonic separators. One separator is installed for flows to Outfalls 3 and 4, and a second one is installed for flows to outfall 5.

SECTION II – OBSERVATIONS

Location: Hopper cars area		
Observation #: WJ1-OB-001	**Date:** April 11, 2025	**Weather:** Cloudy
US EPA observed sediment on the ground near the hopper cars and storm drain inlets.		
Photos 1 through 7.		

Location: Dock area		
Observation #: WJ1-OB-002	**Date:** April 11, 2025	**Weather**: Cloudy
US EPA observed sediment in storm drains and unstabilized ground.		
Photos 15 through 17, 19, and 22.		

Location: Dock area		
Observation #: WJ1-OB-003	**Date:** April 11, 2025	**Weather**: Cloudy
US EPA observed accumulations of grain along the dock area near holes in the sheet piling, and erosion along the fence line.		
Photos 8 through 10, 25, and 27-31.		

Location: Area by dust collector		
Observation #: WJ1-OB-004	**Date:** April 11, 2025	**Weather:** Cloudy
EPA observed dust on the ground by the dust collector		
Photo 24		

SECTION III – RECORDS REVIEW

Records may not be in sequential order

Record: Storm Water Pollution Prevention Plan		**AOC:** Yes
Ref #: WJ1-RR-001	**Reviewed By:** William Jones	**Reviewed Date:** April 11, 2025

The onsite version of the SWPPP is dated October 2022, and the last revision was marked as March 2023.

1. Information collected through a Clean Water Act Section 308 Information Request following the inspection is under review.

SECTION IV – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted as part of the inspection.

SECTION V - AREAS OF CONCERN

See below for areas of concern related to the current industrial storm water General Permit OHR000007:

- Part 2.1.2.2 Good Housekeeping: Requires the facility to keep clean all exposed areas that are potential sources of pollutants, using measures such as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers.
    - US EPA documented areas of concern around Track 2 and the contractor roll off area. Sediment was observed on the concrete by the hopper cars and around the storm drain inlets. Dust was also observed on the ground by the dust collector. See photograph 24.
    - US EPA documented grain accumulation near the waterway /dock area. US EPA also documented sediment build up to the top of the sheet pilings in some areas. See photographs 8-10, 25, and 27-31.
    - US EPA documented areas of concern in the Outfall 5 area. The area has a patch of unstabilized black dirt near an outfall. See photograph 17. Inside a storm sewer shown in photographs 15 and 16, US EPA documented sediment and trash accumulation inside the structure leading into the storm water pipe.
- Section 2.1.2.5 Erosion and Sediment Controls: “You shall stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, and the resulting discharge of pollutants. Among other actions you shall take to meet this limit, you shall place flow velocity dissipation devices at discharge locations and within outfall channels where necessary to reduce erosion and or settle out pollutants.”
    - US EPA documented exposed areas not stabilized. See photographs 3, 6, 8, 17, 19, 25, and 29.
- Section 2.1.2.11 Waste, Garbage and Floatable Debris: “You shall ensure that waste, garbage, and floatable debris are not discharged to receiving waters by keeping exposed ares free of such materials or by intercepting them before they are discharged.”
    - See photographs 15 and 16 for documentation of garbage and floatable material inside sewer.
- SWPPP: US EPA noted that the SWPP is not up to date. US EPA also documented holes in the sheet piling along the dock, which was not identified in the SWPPP.

See above observations in Section II and III related to the areas of concern.

SECTION VI – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

The EPA REGION 5 Lead Inspector held a closing conference with Facility personnel on April 11, 2025, for the inspection. During the closing conference, EPA REGION 5 Lead Inspector discussed the observations and Areas of Concern identified during the inspection. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination.

William Jones, along with Jeremy Leggett, Nick Patterson, and Treavor Parks were present for the closing conference. Mr. Jones shared that the observations and Areas of Concern were preliminary. Mr. Jones confirmed that no information gathered was considered Confidential Business Information. Mr. Jones then relayed the following preliminary observations to the Facility representatives:

- Documented housekeeping by track 2 and the contractor roll off area.
- Documented the accumulation of grain near the waterway.
- Documented Outfall 5 where there is an area of black dirt with the potential to be swept into the outfall.
- Current SWPPP does not show all the Facility's discharge points.

Since the Facility did not provide copies of documents during the inspection, US EPA request the documents through a Clean Water Action Section 308 Information Request.

Follow Up

A Clean Water Act Section 308 Information Request was sent to the Facility on April 24, 2025. Responses were received on May 1, and 8, 2025.

SECTION VII – LIST OF APPENDICES

1. Photo Log

APPENDIX 1: PHOTO LOG

All photos taken in the eastern time zone by William Jones, Environmental Engineer, U.S. EPA
Camera: Pentax WG-1

Inspection Date: 4-11-2025

Photograph 1. Ground alongside of the track where the hopper cars were. Sediment can be seen on the ground by the hopper car. This is the track 2 loading area.			IMGP0001.JPG
April 11, 2025/10:05 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
Camera Direction: North-east			

Inspection Date: 4-11-2025

Photograph 2. Ground alongside of the track where the hopper cars were. Sediment can be seen on the ground by the hopper car.			IMGP0002.JPG
April 11, 2025/10:05 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
Camera Direction: North-east			

Photo 3. View of outfall near hopper cars shown in photographs 1 and 2. This unstabilized area drains to outfall 001.			IMGP0003.JPG
April 11, 2025/10:11 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
Camera Direction: Down			

Photograph 4. Closeup of inlet shown in photograph 3.			IMGP0004.JPG
April 11, 2025/10:13 a..m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
Camera Direction: Downward			

Photo 5. View through hole of manhole lid shown in photograph 4. Sediment can be seen at the bottom of the inlet protection.			IMGP0005.JPG
April 11, 2025/10:13 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
View looking down			

Photograph 6. Second mahole leading to outfall 001			IMGP0006.JPG
April 11, 2025/10:15 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
View looking easterly			

Photograph 7. Close view through hole in manhole lid shown in photograph 6. Sediment can be seen in the inlet protection.			IMGP0007.JPG
April 10, 2025/10:16 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
View looking down			

Photograph 8. Fence with dock area beyond fence			IMGP0008.JPG
April 11, 2025/10:23 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
Looking westerly			

Photograph 9. Fence dock area next to area shown in photograph 8. Grain can be seen accumulating at the edge of the dock against the sheet pilings. Holes can be seen in the sheet pilings.			IMGP009.JPG
April 11, 2025/10:28 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
South-westerly			

Photograph 10. Closer view of dock area shown on the right side of photograph 9. Grain can be seen just on the other side of the fence. Grain has also accumulated along the sheet pilings at the edge of the water. Holes can be seen in the sheet pilings where the grain has accumulated.			IMGP0010.JPG
April 11, 2025/10:28 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
Westerly			

Inspection Date: 4-11-2025

Photograph 11. Inlet along roadway near the dock area shown in photograph 10.			IMGP0011.JPG
April 11, 2025/10:31 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
Looking down			

Photograph 12. Closeup of inlet shown in photograph 11. This leads to outfall #2.			IMGP0012.JPG
April 11, 2025/10:31 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
View down			

Photograph 13. Pavement damp from liquid under truck close to dock area			IMGP0013.JPG
April 11, 2025/10:35 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
Down			

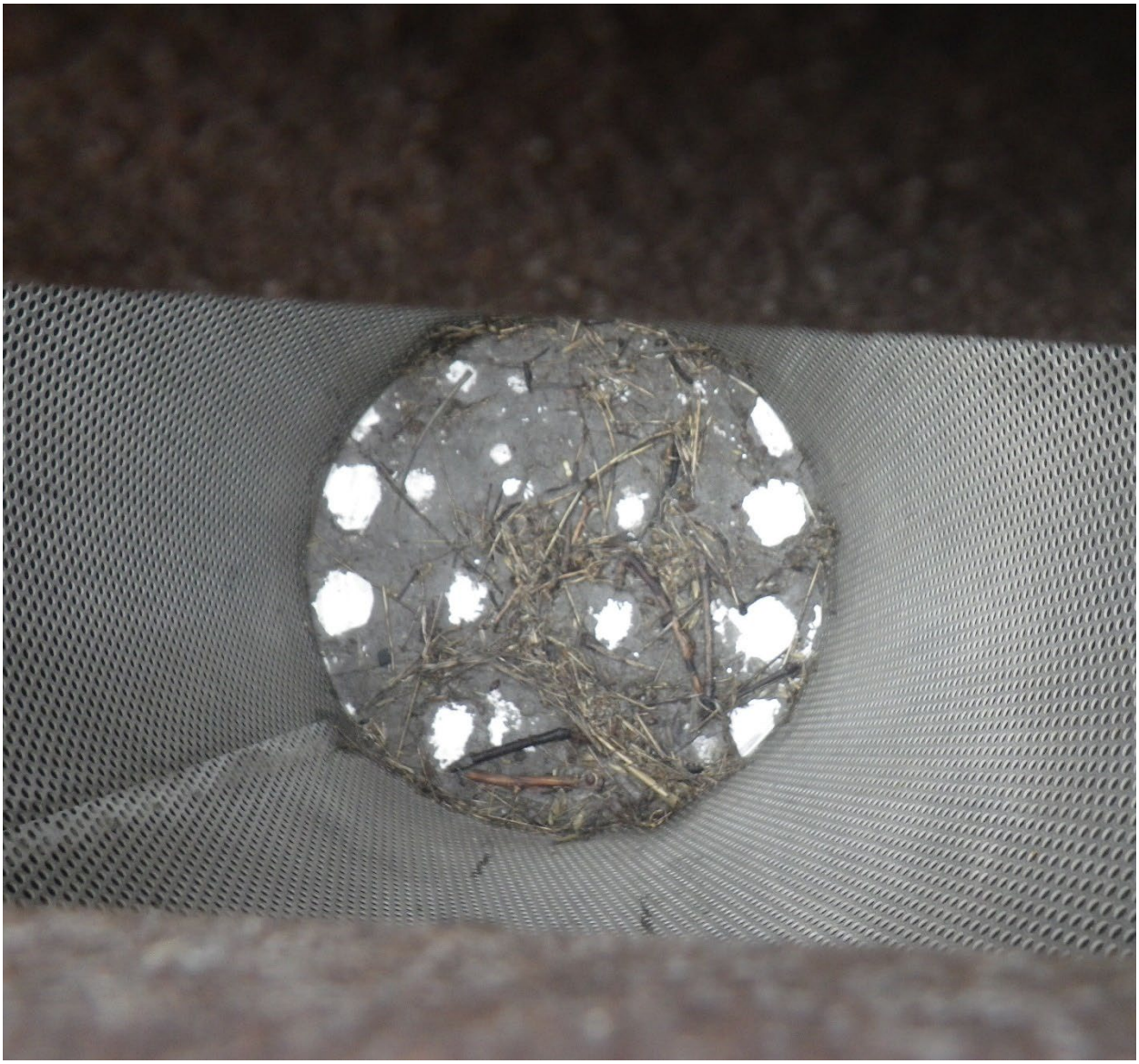
Photograph 14. Area south-easterly of the grain unloading area			IMGP0014.JPG
April 11, 2025/10:37 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
Looking down at the rip rap and the Maumee River			

Photograph 15. Storm sewer inlet that leads to outfall3/4.			IMGP0015.JPG
April 11, 2025/10:39 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
Looking down			

Photograph 16. Close up through the grate shown in photograph 15.			IMGP0016.JPG
April 11, 2025/10:40 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
Looking down			

Inspection Date: 4-11-2025

Photograph 17. Storm water inlet leading to outfall 005. This is near the truck grain unloading area.			IMGP0017.JPG
April 11, 2025/10:46 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
Looking down			



Photograph 18. View of inlet protection inside manhole shown in photograph 19.			IMGP0018.JPG
April 11, 2025/10:47 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
View down			

Photograph 19. Area east of truck unloading area. Unstabilized area east of the scales.			IMGP0019.JPG
April 11, 2025/10:51 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
Easterly			

Photograph 20. Hydraulic fluid staining on the pavement by the truck unloading area.			IMGP0020.JPG
April 11, 2025/10:54 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
North-Easterly			

Photograph 21. Staining on the pavement by the truck unloading area.			IMGP0021.JPG
April 11, 2025/10:55 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
North-Easterly			

Photograph 22. Roll off container for dust collector. Some is spilled on the ground.			IMGP0022.JPG
April 11, 2025/10:58 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
Easterly			

Photograph 23. Inside the roll off container shown in photograph 22.			IMGP0023.JPG
April 11, 2025/10:59 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
Easterly			

Photograph 24. Dust collector and dust buildup			IMGP0024.JPG
April 11, 2025/11:10 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
Easterly			

Photograph 25. Dock area with sediment buildup along sheet pilings.			IMGP0025.JPG
April 11, 2025/11:19 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
Westerly			

Photograph 26. Outfall 001 into the Maumee			IMGP0026.JPG
April 11, 2025/11:20 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
View looking down			

Photograph 27. Dock area showing the grain build up along the sheet pilings			IMGP0027.JPG
April 11, 2025/11:22 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
Westerly			

Photograph 28. Dock area showing the sheet pilings and grain along the pilings.			IMGP0028.JPG
April 11, 2025/11:22 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
Southerly			

Photograph 29. Dock area shown in photograph 28. Near the middle of the photograph can be seen erosion and grain accumulation			IMGP0029.JPG
April 11, 2025/11:23 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
Southerly			

Photograph 30. Grain can be seen accumulating along the sheet pilings on the edge of the dock. The red arrows point to the grain.			IMGP0030.JPG
April 11, 2025/11:25 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
Easterly and down			

Photograph 31. Grain can be seen accumulating along the sheet pilings on the edge of the dock at ground level. The red arrows point to the grain. Holes can be seen in the sheet piling.			IMGP0031.JPG
April 11, 2025/11:27 a.m.		No PII	Photographer: William Jones
Mondelēz Toledo Ohio Facility			
Easterly			