

**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	09/27/2022		
Media:	Water		
Regulatory Program(s)	Clean Water Act		
Company Name:	Cargill, Incorporated		
Facility Name:	Cargill, Incorporated – Westwego Grain Elevator		
Facility Physical Location:	933 River Rd		
(city, state, zip code)	Westwego, LA 70094		
Mailing address:	933 River Rd		
(city, state, zip code)	Westwego, LA 70094		
County/Parish:	Jefferson Parish		
Facility Contact:	Rashard Hart	Plant Superintendent	
	504-436-5864		
FRS Number:			
Identification/Permit Number:	LA0046485		
Media Number:	AI#14010		
NAICS:	493130		
SIC:	5153		
Personnel participating in inspection:			
Michael Williams	EPA/ 6EN-WMH	Inspector	281-983-2150
Jonathan Howell	Cargill, Incorporated	Site Safety Coordinator	985-536-1529
EPA Lead Inspector Signature/Date			12/14/2022
	Michael D. Williams		Date
Supervisor Signature/Date	ROBERTO BERNIER Digitally signed by ROBERTO BERNIER Date: 2022.12.16 15:09:19 -06'00'		
	Roberto Bernier		Date

Section I - Introduction

PURPOSE OF THE INSPECTION

EPA Region 6 inspector, Michael Williams, arrived at Cargill, Incorporated – Westwego, at 9:45 am on September 27, 2022, for an unannounced NPDES wastewater treatment inspection. During the opening conference, I met with Jonathan Howell, Site Safety Coordinator. Mr. Howell was informed that this was an EPA lead compliance evaluation inspection to determine compliance with the facility's National Pollutant Discharge Elimination System (NPDES) permit and the Clean Water Act. The scope of the inspection was with permit LA0046485, facility operations, and maintenance under the Clean Water Act. The inspection was conducted under the authority of the NPDES permit program, in accordance with the Federal CWA.

The information presented in this report is based on the materials and information supplied by Cargill, Incorporated representatives, observations made during the inspection, and records and reports maintained by the permittee.

FACILITY DESCRIPTION

Cargill, Incorporated is a grain storage and export facility. The facility is located at 933 River Rd, Westwego, Louisiana. The facility receives various grains such as corn, soybeans, sorghum, oats, and wheat by barge and rail. Conveyor belts are used to load and store in silos. These products are then eventually transferred to barges for export.

The facility has four sanitary package plants located throughout the facility. The flow from these plants is less than 1500 gallons per day. (See Attachment A) These plants discharge to various outfalls.

Stormwater runoff is also collected from the yard and commingles with previous discharge from Outfall 003 prior to discharging to Outfall 004.

Section II- Observations

This inspection revealed the following observations:

Cargill, Incorporated grain elevator and storage process contributes to the product being on the ground and getting into the stormwater. The various grains or particles of the grains can become airborne and settle on the ground or grains are spilled in transit. This contributes to the grains getting into the stormwater during wet weather events. The current design of the facility does not provide adequate segregation or settling prior to discharging from Outfall 004.

Section III- Areas of Concerns

This inspection revealed the following areas of concerns:

- Cargill, Incorporated has multiple permit exceedance of TOC. The facility has completed various projects to reduce grain dust but still has a problem meeting permit limits for TOC. The site has routine housekeeping that includes inspections of storm drains and a full-time housekeeping crew that addresses daily spills. Without adequate controls that segregate, settle, or filter the grains from the discharge, Cargill will continue to exceed TOC limits.
- Cargill, Incorporated is in the process of doing some corrective actions. They have hired Curtis Environmental. Curtis Environmental collected geotechnical data last fall and is currently completing the design of a stormwater retention pond that will collect all the stormwater from the site. The plan is for the pond to have one discrete outfall so the stormwater sampling will more accurately represent the impact of stormwater runoff at the site. After the plans have been finalized Curtis Environmental will start the re-permitting process.

Section IV – LIST OF APPENDICES

- Appendix A – Photo Log

NPDES Inspection Photo Log

Location:	Cargill, Incorporated -Westwego LA0046485				
Photographer:	Michael Williams				
Photo#	1	Date:	9/27/2022	Time:	11:49 am
Description	Grain Elevators				



NPDES Inspection Photo Log					
Location:		Cargill, Incorporated -Westwego LA0046485			
Photographer:		Michael Williams			
Photo#	2	Date:	8/4/2022	Time:	10:48 am
Description		Storm canal flowing to outfall 004 (Septic conditions on day of inspection due to organics present and no flow)			



NPDES Inspection Photo Log

Location:	Cargill, Incorporated -Westwego LA0046485				
Photographer:	Michael Williams				
Photo#	3	Date:	9/27/2022	Time:	11:43 am
Description	Outfall 003 flowing to canal that commingles with Outfall 004				



NPDES Inspection Photo Log

Location:	Cargill, Incorporated -Westwego LA0046485				
Photographer:	Michael Williams				
Photo#	4	Date:	9/27/2022	Time:	10:51 am
Description	Grain that is on the ground				



NPDES Inspection Photo Log					
Location:		Cargill, Incorporated -Westwego LA0046485			
Photographer:		Michael Williams			
Photo#	5	Date:	9/27/2022	Time:	11:51 am
Description		Close up view of grain on the ground			

