



**Environmental  
Protection Agency**

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

July 27, 2010

RE: NPDES PERMIT 3IE00030  
MORTON INTERNATIONAL, INC.  
MORTON SALT DIVISION  
570 HEADLANDS ROAD  
LAKE COUNTY  
INDUSTRIAL

Ms. Mary Ellen K. Abel  
Quality Control & Environmental Manager  
Morton International, Inc.  
Morton Salt Division  
P.O. Box 428  
Grand River, OH 44045

Dear Ms. Abel:

On July 1, 2010, this writer conducted an inspection of the above referenced facility. You represented Morton Salt during the inspection. The inspection was prompted by the anticipated renewal of the National Pollutant Discharge Elimination (NPDES) permit.

The Morton Salt Facility is an underground rock salt mining operation. The facility uses a physical process involving underground mine face preparation, drilling, cutting and blasting. Ammonium nitrate with fuel oil is the blasting agent that is used. A Continuous Miner is also used to mechanically break salt from the mining face. Rock salt is hoisted to the surface for further processing. Anti-caking agents are added to the salt. Rock salt is either bagged or stockpiled until shipped by truck or lake freighter. The facility operates three shifts, five days each week. Approximately one hundred-seventy people are employed at the site.

Sanitary wastewater is treated at the Gary L. Kron Water Reclamation Facility. Process wastewater is generated during process clean-up and at Wet Scrubber #1. A coagulant is added to the process water and pH adjusted. Storm water is pH adjusted before flowing to the two settling ponds. The treated process water and storm water are combined and then discharged to the Grand River at Outfall 001. At the time of inspection Outfall 001 was not discharging.

During the inspection, a discussion on the use of tarps was initiated. You stated that the long term piles of salt are tarped within 30 days of filling the pile. A private contractor has been hired by Morton Salt to tarp the long term piles and may take two days to complete the tarping of a pile. Short term piles are not tarped because they are in movement and use. Short term piles may be exposed for up to six months.

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As part of the Storm Water Pollution Prevention Plan, Part IV (D) (4) of the NPDES permit requires a comprehensive site compliance evaluation. A report must be generated each year. Please provide this office with copies of the reports for the past three years.

This office has recently reviewed your Discharge Monitoring Reports (DMRs) covering the period of January 2006 to June 2010. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows:

**Effluent Limitation Violations**

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00400	pH	1D Conc	6.5	6.4	01/23/2007
001	00400	pH	1D Conc	6.5	6.3	02/8/2007
001	00400	pH	1D Conc	6.5	5.8	12/26/2006
001	00550	Oil and Grease, Total	1D Conc	15	20	06/27/2007
001	00400	pH	1D Conc	6.5	6.37	05/20/2009
001	00400	pH	1D Conc	6.5	5.6	12/23/2008
001	00400	pH	1D Conc	6.5	6.37	4/8/2009
001	00400	pH	1D Conc	6.5	6.41	4/14/2009

**Frequency Violations**

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	99995	Cyanide, Free	1/2Weeks	1	0	07/15/2006

Please be advised that failure to comply with the NPDES permit limitations or to satisfy the monitoring or reporting requirements of your NPDES permit may be cause for enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code.

Further review of the data reveals that there are many instances when ammonia, total dissolved solids, specific conductance and cyanide are reported at elevated concentrations (in the bulk of the instances, greater than the water quality standard for the applicable pollutant). This is of concern with the Agency, and it is anticipated that the renewal permit will require measures to address these issues.

It is also anticipated that the renewal permit will contain language in Part II of the permit that requires sampling at stations 001, 801 and 901 to occur on the same day. The intent of this same day sampling is to see if the discharge from 001 affects downstream water quality, in light of the upstream water quality; therefore, sampling at stations 001, 801, and 901 must occur on the same day.

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The renewal permit will be drafted in the near future. When the draft permit is public noticed, please review it carefully. A 30-day comment period will be provided. Any questions or comments regarding the draft permit must be in writing and directed to this district office.

Should you have any questions regarding this letter, please contact the undersigned at (330) 963-1183.

Sincerely,

A handwritten signature in cursive script that reads "Marie Underwood".

Marie Underwood, P.E.  
Environmental Engineer  
Division of Surface Water

MU/mt