

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

VILLAGE OF HOMEWOOD, HOMEWOOD	)	
ILLINOIS, VILLAGE OF ORLAND PARK,	)	
ORLAND PARK ILLINOIS, VILLAGE OF	)	
MIDLOTHIAN, MIDLOTHIAN ILLINOIS,	)	
VILLAGE OF TINLEY PARK, TINLEY PARK	)	
ILLINOIS, EXXONMOBIL OIL	)	
CORPORATION, VILLAGE OF WILMETTE,	)	
WILMETTE ILLINOIS, CITY OF COUNTRY	)	
CLUB HILLS, COUNTRY CLUB HILLS	)	
ILLINOIS, NORAMCO-CHICAGO, INC.,	)	
FLINT HILLS RESOURCES JOLIET LLC,	)	
CITY OF EVANSTON, EVANSTON ILLINOIS,	)	PCB 16-14 (Homewood)
VILLAGE OF SKOKIE, SKOKIE ILLINOIS,	)	PCB 16-15 (Orland Park)
ILLINOIS DEPARTMENT OF	)	PCB 16-16 (Midlothian)
TRANSPORTATION, METROPOLITAN	)	PCB 16-17 (Tinley Park)
WATER RECLAMATION DISTRICT OF	)	PCB 16-18 (ExxonMobil)
GREATER CHICAGO, VILLAGE OF	)	PCB 16-20 (Wilmette)
RICHTON PARK, RICHTON PARK	)	PCB 16-21 (Country Club Hills)
ILLINOIS, VILLAGE OF LINCOLNWOOD,	)	PCB 16-22 (Noramco-Chicago)
LINCOLNWOOD ILLINOIS, CITY OF OAK	)	PCB 16-23 (Flint Hills Resources)
FOREST, OAK FOREST ILLINOIS, VILLAGE	)	PCB 16-25 (Evanston)
OF LYNWOOD, LYNWOOD ILLINOIS,	)	PCB 16-26 (Skokie)
CITGO HOLDINGS, INC., VILLAGE OF NEW	)	PCB 16-27 (IDOT)
LENOX, NEW LENOX, ILLINOIS, CITY OF	)	PCB 16-29 (MWRDGC)
LOCKPORT, LOCKPORT ILLINOIS,	)	PCB 16-30 (Richton Park)
CATERPILLAR, INC., CITY OF CREST HILL,	)	PCB 16-31 (Lincolnwood)
CREST HILL ILLINOIS, CITY OF JOLIET,	)	PCB 16-33 (Oak Forest)
JOLIET ILLINOIS, MORTON SALT, INC.,	)	PCB 19-7 (Village of Lynwood)
CITY OF PALOS HEIGHTS, PALOS	)	PCB 19-8 (Citgo Holdings)
HEIGHTS ILLINOIS, VILLAGE OF	)	PCB 19-9 (New Lenox)
ROMEOVILLE, ROMEOVILLE ILLINOIS,	)	PCB 19-10 (Lockport)
IMTT ILLINOIS LLC, STEPAN CO.,	)	PCB 19-11 (Caterpillar)
VILLAGE OF PARK FOREST, PARK FOREST	)	PCT 19-12 (Crest Hill)
ILLINOIS, OZINGA READY MIX	)	PCB 19-13 (Joliet)
CONCRETE, INC., OZINGA MATERIALS,	)	PCB 19-14 (Morton Salt)
INC., MIDWEST MARINE TERMINALS LLC.	)	PCB 19-15 (Palos Heights)
VILLAGE OF MOKENA, MOKENA	)	PCB 19-16 (Romeoville)
ILLINOIS, VILLAGE OF OAK LAWN, OAK	)	PCB 19-17 (IMTT Illinois)
LAWN ILLINOIS, VILLAGE OF DOLTON,	)	PCB 19-18 (Stepan)
DOLTON ILLINOIS, VILLAGE OF	)	PCB 19-19 (Park Forest)
GLENWOOD, GLENWOOD ILLINOIS,	)	PCB 19-20 (Ozinga Ready Mix)
VILLAGE OF MORTON GROVE, MORTON	)	PCB 19-21 (Ozinga Materials)
GROVE ILLINOIS, VILLAGE OF LANSING,	)	PCB 19-22 (Midwest Marine)
LANSING ILLINOIS, VILLAGE OF	)	PCB 19-23 (Mokena)
FRANKFORT, FRANKFORT ILLINOIS,	)	PCB 19-24 (Oak Lawn)
VILLAGE OF WINNETKA, WINNETKA	)	PCB 19-25 (Dolton)
ILLINOIS, VILLAGE OF LA GRANGE, LA	)	PCB 19-26 (Glenwood)

GRANGE ILLINOIS, INGREDION, INC.,	)	PCB 19-27 (Morton Grove)
VILLAGE OF CHANNAHON, CHANNAHON	)	PCB 19-28 (Lansing)
ILLINOIS, COOK COUNTY DEPARTMENT	)	PCB 19-29 (Frankfort)
OF TRANSPORTATION AND HIGHWAYS,	)	PCB 19-30 (Winnetka)
VILLAGE OF NILES, NILES ILLINOIS,	)	PCB 19-31 (La Grange)
SKYWAY CONCESSION COMPANY LLC,	)	PCB 19-32 (Ingredion)
VILLAGE OF ELWOOD, ELWOOD	)	PCB 19-33 (Channahon)
ILLINOIS, CITY OF CHICAGO, CHICAGO	)	PCB 19-34 (CCDTH)
ILLINOIS, VILLAGE OF CRESTWOOD,	)	PCB 19-35 (Niles)
CRESTWOOD ILLINOIS and VILLAGE OF	)	PCB 19-36 (Skyway)
RIVERSIDE, RIVERSIDE ILLINOIS	)	PCB 19-37 (Elwood)
	)	PCB 19-38 (Chicago)
Petitioners,	)	PCB 19-40 (Crestwood)
v.	)	PCB 19-48 (Riverside)
	)	
ILLINOIS ENVIRONMENTAL PROTECTION	)	(Time-Limited Water Quality
AGENCY,	)	Standard)
	)	(Consolidated)
Respondent.	)	

**NOTICE OF FILING**

To: Don Brown, Clerk of the Board  
Illinois Pollution Control Board  
James R. Thompson Center  
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Chicago, Illinois 60601  
[Don.Brown@illinois.gov](mailto:Don.Brown@illinois.gov)  
(Via Electronic Mail)

(SEE PERSONS ON ATTACHED SERVICE LIST)

**PLEASE TAKE NOTICE** that on September 23, 2019, Morton Salt, Inc. electronically filed with the Office of the Clerk of the Illinois Pollution Control Board **Petitioner Morton Salt's Response to Questions of the Pollution Control Board Concerning the Petition, and Adoption and Incorporation of the Response of the Metropolitan Water Reclamation District**, a copy of which is hereby served upon you.

**MORTON SALT, INC.**

By: /s/ Eric E. Boyd  
One of Its Attorneys

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**CERTIFICATE OF E-MAIL SERVICE**

The undersigned attorney certifies that he served a copy of the foregoing **NOTICE OF FILING** and **PETITIONER MORTON SALT'S RESPONSE TO QUESTIONS OF THE POLLUTION CONTROL BOARD CONCERNING THE PETITION, AND ADOPTION AND INCORPORATION OF THE RESPONSE OF THE METROPOLITAN WATER RECLAMATION DISTRICT** to the parties on the attached Service List, by sending a copy to the email addresses designated in the list on or before 5:00 p.m. on September 23, 2019.

*/s/ Eric E. Boyd*

\_\_\_\_\_  
One of the Attorneys for Morton Salt, Inc.

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

VILLAGE OF HOMEWOOD, HOMEWOOD	)	
ILLINOIS, VILLAGE OF ORLAND PARK,	)	
ORLAND PARK ILLINOIS, VILLAGE OF	)	
MIDLOTHIAN, MIDLOTHIAN ILLINOIS,	)	
VILLAGE OF TINLEY PARK, TINLEY PARK	)	
ILLINOIS, EXXONMOBIL OIL	)	
CORPORATION, VILLAGE OF WILMETTE,	)	
WILMETTE ILLINOIS, CITY OF COUNTRY	)	
CLUB HILLS, COUNTRY CLUB HILLS	)	
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TRANSPORTATION, METROPOLITAN	)	PCB 16-17 (Tinley Park)
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LINCOLNWOOD ILLINOIS, CITY OF OAK	)	PCB 16-23 (Flint Hills Resources)
FOREST, OAK FOREST ILLINOIS, VILLAGE	)	PCB 16-25 (Evanston)
OF LYNWOOD, LYNWOOD ILLINOIS,	)	PCB 16-26 (Skokie)
CITGO HOLDINGS, INC., VILLAGE OF NEW	)	PCB 16-27 (IDOT)
LENOX, NEW LENOX, ILLINOIS, CITY OF	)	PCB 16-29 (MWRDGC)
LOCKPORT, LOCKPORT ILLINOIS,	)	PCB 16-30 (Richton Park)
CATERPILLAR, INC., CITY OF CREST HILL,	)	PCB 16-31 (Lincolnwood)
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JOLIET ILLINOIS, MORTON SALT, INC.,	)	PCB 19-7 (Village of Lynwood)
CITY OF PALOS HEIGHTS, PALOS	)	PCB 19-8 (Citgo Holdings)
HEIGHTS ILLINOIS, VILLAGE OF	)	PCB 19-9 (New Lenox)
ROMEOVILLE, ROMEOVILLE ILLINOIS,	)	PCB 19-10 (Lockport)
IMTT ILLINOIS LLC, STEPAN CO.,	)	PCB 19-11 (Caterpillar)
VILLAGE OF PARK FOREST, PARK FOREST	)	PCT 19-12 (Crest Hill)
ILLINOIS, OZINGA READY MIX	)	PCB 19-13 (Joliet)
CONCREATE, INC., OZINGA MATERIALS,	)	PCB 19-14 (Morton Salt)
INC., MIDWEST MARINE TERMINALS LLC.	)	PCB 19-15 (Palos Heights)
VILLAGE OF MOKENA, MOKENA	)	PCB 19-16 (Romeoville)
ILLINOIS, VILLAGE OF OAK LAWN, OAK	)	PCB 19-17 (IMTT Illinois)
LAWN ILLINOIS, VILLAGE OF DOLTON,	)	PCB 19-18 (Stepan)
DOLTON ILLINOIS, VILLAGE OF	)	PCB 19-19 (Park Forest)
GLENWOOD, GLENWOOD ILLINOIS,	)	PCB 19-20 (Ozinga Ready Mix)
VILLAGE OF MORTON GROVE, MORTON	)	PCB 19-21 (Ozinga Materials)
GROVE ILLINOIS, VILLAGE OF LANSING,	)	PCB 19-22 (Midwest Marine)
LANSING ILLINOIS, VILLAGE OF	)	PCB 19-23 (Mokena)

FRANKFORT, FRANKFORT ILLINOIS,	)	PCB 19-24 (Oak Lawn)
VILLAGE OF WINNETKA, WINNETKA	)	PCB 19-25 (Dolton)
ILLINOIS, VILLAGE OF LA GRANGE, LA	)	PCB 19-26 (Glenwood)
GRANGE ILLINOIS, INGREDION, INC.,	)	PCB 19-27 (Morton Grove)
VILLAGE OF CHANNAHON, CHANNAHON	)	PCB 19-28 (Lansing)
ILLINOIS, COOK COUNTY DEPARTMENT	)	PCB 19-29 (Frankfort)
OF TRANSPORTATION AND HIGHWAYS,	)	PCB 19-30 (Winnetka)
VILLAGE OF NILES, NILES ILLINOIS,	)	PCB 19-31 (La Grange)
SKYWAY CONCESSION COMPANY LLC,	)	PCB 19-32 (Ingredion)
VILLAGE OF ELWOOD, ELWOOD	)	PCB 19-33 (Channahon)
ILLINOIS, CITY OF CHICAGO, CHICAGO	)	PCB 19-34 (CCDTH)
ILLINOIS, VILLAGE OF CRESTWOOD,	)	PCB 19-35 (Niles)
CRESTWOOD ILLINOIS and VILLAGE OF	)	PCB 19-36 (Skyway)
RIVERSIDE, RIVERSIDE ILLINOIS	)	PCB 19-37 (Elwood)
	)	PCB 19-38 (Chicago)
Petitioners,	)	PCB 19-40 (Crestwood)
	)	PCB 19-48 (Riverside)
v.	)	
	)	
ILLINOIS ENVIRONMENTAL PROTECTION	)	(Time-Limited Water Quality
AGENCY,	)	Standard)
	)	(Consolidated)
Respondent.	)	

**PETITIONER MORTON SALT’S RESPONSE TO QUESTIONS OF THE POLLUTION CONTROL BOARD CONCERNING THE PETITION, AND ADOPTION AND INCORPORATION OF THE RESPONSE OF THE METROPOLITAN WATER RECLAMATION DISTRICT**

Petitioner Morton Salt, Inc. (hereinafter “Morton”), by and through its attorneys, and pursuant to the Order of the Illinois Pollution Control Board and its Hearing Officer dated July 24, 2019, provides the following response to the Board Questions (hereinafter “Response”). This Response consists of Morton’s individual response and Morton’s adoption and incorporation of the response of the Metropolitan Water Reclamation District.

1. Individual Response

On July 25, 2018, Morton filed its Individual Submittal in Support of Petition for Chloride Time-Limited Water Quality Standard for the Defined Chicago Area Waterway System/Des Plaines River Watershed. (PCB 19-14.) The Individual Submittal provided information on Morton’s Calumet Site located at 3443-3461 East 100<sup>th</sup> Street in Chicago, Illinois. The Calumet Site is a large salt storage facility serving the Chicago area. The Individual Submittal, among other things, discussed the Best Management Practices (“BMPs”) that Morton had implemented and was committed to supporting and implementing with respect to the Calumet Site.

The IEPA filed its Recommendation in this matter on April 5, 2019 and Morton filed its response to the IEPA's recommendation on April 19, 2019. Morton did not have any comments with respect to the IEPA's Recommendation except for the comments on the IEPA's Proposed BMPs for salt storage facilities like the Calumet Site. Morton's comments on the IEPA's Proposed BMPs for salt storage facilities were as follows:

- Retention ponds are not feasible, practical, or effective in every situation.
- Outdoor salt piles cannot be covered "at all times except when in active use" because there is a period of time between when the salt is unloaded and when the pile is constructed and ready to be tarped.
- Berms should not be a prescriptive requirement since they can be counterproductive to the goal of reducing contact between salt and stormwater. Salt piles will occasionally be smaller than the total area of the salt storage facility, especially late in the winter season or when a new storage pile is being constructed. Berms can actually "trap" stormwater and prevent it from being directed away from a pile. Also, tarping around berms can provide a pathway for stormwater to seep under the pile.
- Tarping of all trucks is very difficult for a salt storage facility to enforce, since their customers include DOTs, municipalities, and private companies. The type of equipment used by these entities varies significantly – not all trucks are equipped with tarps.
- Requirements to remove surplus materials from the site when winter activity is finished and to complete inspections and repairs prior to the winter season do not make sense for salt storage facilities, like Morton's Calumet Site, that provide salt to customers year round or receive deliveries outside the winter months in preparation for the next winter season. The timing of repairs should not be prescribed. In some cases, it may be most feasible to complete repairs in the winter.
- Stormwater retention can be considered but should not be a prescriptive requirement at any site. Retention can be an effective solution for managing flooding and settling suspended solids, but it will not be effective for removing chloride from stormwater. Retention within the berm will expose the salt pile to flooding when a storm event more significant than a 25-year/24-hour event occurs. Additionally, "impacted stormwater" will not have sufficient salt concentrations to be used as a pre-wetting brine without significant processing that includes adding salt to the water.

A clean document containing the BMPs that Morton is currently committed to supporting and implementing is included as Attachment A and a redline document comparing the IEPA's Proposed BMPs for salt storage facilities to the BMPs that Morton is committed to supporting and implementing is attached as Attachment B.

The Order of the Board and its Hearing Officer dated July 24, 2019, does not reflect Morton's response to the IEPA's recommendation dated April 19. The Order appears in Table 3 to adopt the BMPs for salt storage facilities ("SSFs") recommended by the IEPA. In fact, the Order defines SSFs in Table 2 to include not only Morton Salt's Calumet facility and Noramco's Lemont facility (which are the only two large salt storage facilities for which petitions for a TLWQS have been filed) but also storage facilities for municipal facilities in Riverside, Niles, La Grange, Morton Grove, Glenwood, Oak Lawn, Palos Heights, Joliet, Lynwood, and Richton Park. Morton requests that the Board adopt the BMPs for Morton's Calumet site based on Morton's April 19, 2019 response and the discussion above.

2. ADOPTION AND INCORPORATION OF RESPONSE OF THE METROPOLITAN WATER RECLAMATION DISTRICT

On September 23, 2019, the Metropolitan Water Reclamation District filed its response to the Board Questions contained in the July 24, 2019 Order. As part of its response, Morton adopts and incorporates the response of the Metropolitan Water Reclamation District to the Board's July 24, 2019 Order.

Morton appreciates the opportunity to provide this Response to the Board regarding the July 24, 2019 Order.

Respectfully submitted,

**MORTON SALT, INC.**

By: /s/ Eric E. Boyd  
One of Its Attorneys

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Dated: September 23, 2019

ATTACHMENT A

**Salt Storage Facility BMPs Supported by Morton Salt**

- A. All salt will be stored on an impermeable pad constructed to ensure that minimal stormwater comes into contact with salt.
- B. Where practical, pads will be constructed to direct stormwater away from the salt pile. The permittee should consider directing any drainage that enters the pad to a collection point where feasible.
- C. Outdoor salt piles not stored under permanent cover must be covered by well-secured tarp as soon as practical. The permittee will stage tarp when starting final lift and tarp over the edge of the berm/pad where possible.
- D. Good housekeeping practices must be implemented at salt piles and during salt loading/unloading operations, including: cleanup of salt at the end of each day or conclusion of a storm event; maintaining the pad and equipment; good practices during loading and unloading; cleanup of loading and spreading equipment after each snow/ice event; a written inspection program for storage facility, structures and/or work area; annual inspection and repairs completed when practical; and proper disposal of wash water from trucks/spreaders.
- E. Annual training must be conducted for employees responsible for loading/unloading/handling at docks and trucks at the facility.
- F. An annual report must be completed, as required by Chapter 9.2. The report must be standardized in Excel, and must be submitted through the IEPA web site and to the watershed group.
- G. The permittee must participate in the watershed group.
- H. The permittee should consider using fixed and mobile berms where appropriate to redirect flow and taper over the edge of the pad where possible in order to minimize stormwater contact.
- I. The permittee should consider the retention of stormwater which contacts the salt from a 25-year/24-hour event where feasible.

ATTACHMENT B

Salt Storage Facility BMPs Recommended Supported by IEPA Morton Salt

- A. All salt will be stored on an impermeable pad that must be constructed to ensure that minimal stormwater is coming comes into contact with salt.
- B. Pads must Where practical, pads will be constructed to avoid drainage onto the pad. Any direct stormwater away from the salt pile. The permittee should consider directing any drainage that enters the pad should be directed to a stormwater retention pond to a collection point where feasible.
- C. Outdoor salt piles not stored under permanent cover must be covered by well-secured tarp at all times ~~except when in active use. While working on the pile, fixed or mobile berms shall be incorporated around non-working face to minimize stormwater contact.~~ as soon as practical. The permittee shall will stage tarp when starting final lift and tarp over the edge of the berm/pad where possible.
- D. Good housekeeping policies to prevent or reduce salt runoff practices must be implemented at salt piles and during salt loading/unloading operations, including: cleanup of salt at the end of each day or conclusion of a storm event, ~~tarping of trucks;~~ maintaining the pad and equipment; ~~good practices during loading and unloading and loading;~~ cleanup of loading and spreading equipment after each snow/ice event; a written inspection program for storage facility, structures and/or work area, ~~removing surplus materials from the site when winter activity finished where applicable;~~ annual inspection and repairs completed ~~prior to winter season,~~ when practical; and proper disposal of wash water from trucks/spreaders, etc., ~~must be implemented at salt piles and during salt loading/unloading operations.~~
- E. Annual training must be conducted for employees responsible for loading/unloading/handling at docks and trucks at the facility.
- F. An annual report must be completed. ~~Standardized in excel,~~ as required by Chapter 9.2. The report must be standardized in Excel, and must be submitted through Agency website: the IEPA web site and to the watershed group.
- G. Participate in a Chlorides workgroup for the CAWS and LDPR. The permittee must participate in the watershed group.
- H. ~~Working areas should be bermed and/or sloped to allow snow melt and stormwater to drain away from the area. In some cases, it may be necessary to channel water to a collection point such as a sump, holding tank or lined basin for collection.~~
- J. I. The Permittee shall make use of permittee should consider using fixed and mobile berms where appropriate to redirect flow and taper over the edge of the pad where possible in order to minimize stormwater contact.

J. The ~~Permittee~~permittee should consider the retention of stormwater which contacts the salt from a 25 -year/24-hour storm event where feasible. Such retention could be either within the berm, in a separate basin or store the impacted stormwater and use it as pre-wetting brine.