CLEAN WATER ACT INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 5

Purpose: Inspection Report

Facility: Morton Salt, 570 Headlands Road, Painesville, OH, 44077

NPDES Permit Number: OH0000515

Dates of Inspection: April 13, 2022

Facility Representatives:
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Aaron Adkins, Surface Superintendent, aadkins@kissner.com
Angela Zweifel, Quality and Environmental Manager, azweifel@mortonsalt.com

Report Prepared by:
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I. INTRODUCTION

I. A. Site Entry and Inspection Objectives

Region 5 Lead Inspector, Jessica Stromsdorfer, arrived at Morton Salt (the "Site" or "facility"), located at 570 Headlands Road, Painesville, OH, 44077, at 9:15 AM (ET) on 04/13/2022 for an unannounced inspection. Region 5 Lead Inspector presented her credentials to Nick Newsome and informed the Site that this was an EPA Region 5 inspection to determine compliance with the Clean Water Act (CWA) and the National Pollutant Discharge Elimination System (NPDES) permit program. The inspection was conducted under the authority of the National Pollutant Discharge Elimination System (NPDES) permit program and Section 308 of the CWA.

This report is based on information supplied by Morton Salt representatives, observations made by the Region 5 inspector, and records and reports maintained by the permittee and Region 5 including: direct observations made by Region 5 Inspectors, photographs taken by Region 5 inspectors, physical evidence collected by Region 5 inspectors, measurements taken by Region 5 inspectors, verbal or written statements made by information supplied by Morton Salt representatives (the permittee) during or subsequent to the on-site inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to Region 5 inspectors by Morton Salt representatives during or subsequent to the on-site inspection. In addition, information gathered prior to or after the inspection from a review of USEPA, State, and public records may be included in this report.

The following personnel were involved in the CWA inspection of the Morton Salt facility:

Morton Salt:	Nick Newsome, General Manager
	Aaron Adkins, Surface Superintendent
	Angela Zweifel, Quality and Environmental Manager
EPA:	
	Jessica Stromsdorfer, CWA inspector
	Andi Hodaj, CWA inspector

I. B. Facility/Site Description

This was a CWA NPDES direct discharger and industrial storm water inspection of a facility mainly involved in rock salt mining, a physical process involving conventional mining. Conventional mining consists of the preparation, blasting, crushing & screening underground. Rock Salt is hoisted to the surface where it passes through streamlined operations and is directed to the stockpile or passed over a screen for use as bulk or bagging salt. Bulk salt is shipped by truck, rail or lake freighter and bag salt is shipped by truck. The facility operates three shifts, five (5) to seven (7) days a week, depending on the severity of the winter, and employs 125 people. The facility is adjacent to a wetland area and the Grand River, a tributary of Lake Eerie.

According to facility representatives and the site drainage map, the aboveground property is about 38 acres and consists of three main drainage areas (north, west, and east). Roughly 75% of water is collected in the east and west drainage areas and directed to two treatment ponds (north and south). Under normal conditions, water is pumped from the north pond to a wastewater treatment system (built in October 2020), then discharged from permitted outfall 001.

The Region 5 lead inspector informed the facility of its right to claim any information collected by EPA during the inspection as Confidential Business Information (CBI). EPA and the facility representatives

discussed the necessary Personal Protective Equipment (PPE) for a tour of the Site. The EPA inspection team took a brief safety training then conducted a tour of the production areas.

II. OBSERVATIONS

Wastewater is primarily generated from precipitation contacting product salt. The facility contains several large mounds of salt, both covered and uncovered, that also contains Yellow Prussiate of Soda (YPS), an anticaking agent. All water is meant to drain to the treatment ponds, but inspectors observed flooding, pooling, and alternate drainage patterns throughout the property, as described in Section IV.

In the past, wastewater was pumped from the treatment ponds into the mine, according to the permit and facility representatives. At the time of the inspection, the facility planned to only use city water for its mining operations and has hired Ramboll (a consultancy firm) to help draft a new permit application to reflect changes in wastewater usage and management.

While the inspectors were on site, the wastewater treatment system was not functioning, despite the need to discharge wastewater from flooded treatment ponds. According to information shared during the inspection, the facility has discharged untreated water to outfall 001 in the past to avoid overflows from the treatment ponds into Blackbrook Creek, south of the property. Inspectors saw no flow of treated effluent from the wastewater treatment plant during the inspection, but it was unclear if the facility planned to discharge untreated water to alleviate flooding.

III. RECORDS REVIEW

The following documents were received during the inspection and/or by email:

1. Stormwater Pollution Prevention Plan (SWPPP) Quarterly Inspection Reports, 2021-current
2. SWPPP Annual Inspection Report, 2021
3. Annual Reporting Form
4. NPDES Permit Application
5. Sample Analysis, previous 3 months
6. Discharge Monitoring Report (DMR) template, previous 3 months
7. Site Map with Outfall Locations
8. Surface Flow Diagrams
9. Annual Acute Toxicity Test Reports, 2019-2021

IV. AREAS OF CONCERN

The presentation of areas of concern does not constitute a formal compliance determination or violation.

Area of Concern	Finding
No Secondary Containment	Photos 3, 5-8 show oil drums with no secondary containment.
	Photo 20 shows a salt pile overflowing from the Salt Storage Building near the southern pond.
	Photo 47 shows a citric acid tote without secondary containment.
	Photo 60 shows a fuel tank with no secondary containment.
	Photo 62 shows an unintended salt pile near catch basin.
Collection System Maintenance	Photo 2 shows a stormwater catch basin with silt piled over part of it.
	Photo 3 shows bird balls that have backed up and accumulated within a catch basin.

Area of Concern	Finding
	Photos 14 and 15 show catch basins with silt fences in need of repair.
	Photos 16 and 17 show the flooding in treatment ponds.
	Photos 22 and 23 show a sanitary sewer manhole submerged in flooded south pond. According to the facility, there is no known liner in the ponds.
	Photos 25 and 26 show pooled water near salt piles.
	Photos 27, 28, 32, and 61 show flooded catch basins.
	Photos 29 and 30 show salt residues near catch basin.
	Photo 35 shows catch basin with no silt fence.
	Photos 36 - 39 show the drainage channel on the east edge of the property that is flooded and has backflow.
	Review of SWPPP quarterly inspection reports show a history of control measures needing repair or maintenance. The dates of the quarterly reports reviewed are 6/21/21, 9/24/21, 12/28/21, 3/23/22.
Uncontained Discharges	Photos 9 - 11 show an oily sheen on pooled water.
	Photo 18 shows water in the south pond nearly overflowing the berm on the southern edge of the property into Blackbrook Creek. The 2021 Annual Reporting Form describes this overflow occuring previously.
	Photo 19 shows bird balls outside of stormwater containment area.
Nonfunctioning Equipment	Photo 44 shows the flow meter at outfall 001, which is out of order. Facility stated that flow measurements are taken from the pumps at the pump building.
	Photo 51 shows the nonfunctioning wastewater treatment system.

V. CLOSING CONFERENCE AND FOLLOW UP

The Region 5 Lead Inspector held a closing conference with Facility personnel at 2:15 PM (ET) on 4/13/2022 for the inspection. During the closing conference, Region 5 Lead Inspector discussed the observations and Areas of Concern identified during the inspection, and summarized above. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination.

The following Areas of Concern were highlighted at the closing conference:

- The wastewater treatment plant is not functioning, despite a need to lower the treatment pond level,
- The southern treatment pond is nearly overflowing to Blackbrook Creek,
- Chemical and oil tanks throughout the Site are without secondary containment,
- The sanitary sewer manhole is submerged in the South treatment pond, and
- Flooded and pooling water on the property with oily sheen and/or discoloration.