



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

April 9, 2012

Mr. Sampson Tang
Facility Manager
Morton Salt, Inc.
1050 Pier F Avenue
Long Beach, CA 90802

Dear Mr. Tang:

REQUEST FOR SUBMISSION OF ADDITIONAL STORM WATER PRIORITY POLLUTANTS MONITORING DATA RESULTS – MORTON SALT, INCORPORATED, LONG BEACH FACILITY, LONG BEACH, CA. (NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT NO. CA0061476, CI NO. 6949)

Background

Morton Salt, Inc. (hereinafter Discharger or Morton Salt) is currently discharging pursuant to Order No. R4-2004-0174 (adopted on December 13, 2004) which was amended by Order No. R4-2009-0026 (adopted on February 5, 2009), and National Pollutant Discharge Elimination System (NPDES) Permit No. CA0061476. The NPDES permit expired on November 10, 2009, but has been administratively extended as per 40 CFR Part 122.6. Morton Salt owns and operates a salt processing and packaging plant (Facility) which is located at 1050 Pier F Avenue, Long Beach, California. The Facility produces non-food grade salt for industrial (oil field applications) and home water conditioning and treatment (water conditioning softeners and swimming pool disinfectant). During salt processing, water is employed in air scrubber equipment to control salt dust. The Facility operates one wet scrubber for the dryer and one for other salt handling operations. Scrubber water is the only process water that is generated on site. The Morton Salt Facility is currently permitted to discharge process water (scrubber water) and storm water to Long Beach Harbor, a water of the United States.

The Need for Monitoring Requirements

Morton Salt, Inc. made several facility modifications during the tenure of Order Nos. R4-2004-0174 and R4-2009-0026. The process water originally included has been diverted to the sanitary sewer. Best management practices (BMPs) have been implemented to stop the storm water from coming in contact with salt piles stored onsite. The most recent modification was the installation of a berm at the boundary of the Morton Salt and the Tidelands facility. The purpose of the berm is to segregate discharges from Morton Salt from run on from the adjacent Tidelands facility. Construction of the berm was completed on August 24, 2011. Currently only storm water is being discharged from the Morton Salt Facility in Long Beach via Outfall 001 to Long Beach Harbor. Therefore, much of the data collected during the tenure of Order No. R4-2004-0174 and its amendment by Order No. R-2009-0026, is not representative of the discharges.

Mr. Sampson Tang
Morton Salt, Inc.
Long Beach Facility

- 2 -

April 9, 2012

Two storm water samples were collected during the 2011-2012 rainy season, on December 12, 2011, and January 23, 2012. The December 12, 2011, sample was infected or soiled with a spill. Only the January 2012, sample is considered representative of the discharge from the Morton Salt Facility. The reasonable potential analysis (RPA), optimally requires ten data points to develop effluent limits to be included in the tentative permit which will supersede the current Order. In order to develop the new effluent limitations, additional representative data is required.

This letter requests the Discharger, to collect samples during each discharge event and analyze the samples for all of the priority pollutants. These analyses are required in addition to any requirements included in Order No. R4-2009-0026.

Morton Salt shall submit the results of the sampling in the quarterly reports as directed in Order No. R4-2009-0026. On April 30, 2013, or when six samples have been collected, whichever comes first, Morton Salt shall inform Regional Board staff by letter and attach an excel spread sheet which includes the data collected.

If you have any questions, please contact Mazhar Ali at (213) 576-6652.

Sincerely,



Samuel Unger, P.E.
Executive Officer

cc: Environmental Protection Agency, Region 9, Permits Branch (WTR-5)
U.S. Army Corps of Engineers
NOAA, National Marine Fisheries Service
Department of Interior, U.S. Fish and Wildlife Service
Mr. William Paznokas, Department of Fish and Game, Region 5
Department of Public Health, Sanitary Engineering Section
California State Parks and Recreation
California Coastal Commission, South Coast Region
Los Angeles County, Department of Public Works, Waste Management Division
Ms. Kirsten James, Heal the Bay
Ms. Liz Crosson, Santa Monica BayKeeper
Mr. David Beckman, Natural Resources Defense Council
Ms. Susan Anders, Morton Salt, Inc.
Mr. Lucien Mauge, Morton Salt, Inc.