



November 16, 2015

Pennsylvania Department of Environmental Protection
Bureau of Point and Non-Point Source Management
Rachel Carson State Office Building
P. O. Box 8774
Harrisburg, PA 17105-8774

RE: Comments on Draft PA DEP Industrial Stormwater General Permit (PAG-03)

To Whom It May Concern:

Triton Environmental, Inc. (Triton) is writing on behalf of Morton Salt, Inc. (Morton) regarding the draft PA DEP PAG-03 Authorization to Discharge Under the National Pollutant Discharge Elimination System (NPDES) General Permit for the Discharges of Stormwater Associated with Industrial Activity (General Permit). Based on our review, we have the following comments as provided below.

Part A. III.C.1. – Annual Report

The draft General Permit includes a requirement for an Annual Report. This is not required under the current General Permit. As this will not likely provide additional useful information to the DEP and be an administrative burden on regulated facilities, we are requesting that the requirement for the Annual Report be eliminated from the draft General Permit.

Part C. III. – Routine Inspections

The draft General Permit includes requirements for quarterly visual inspections. We believe that annual inspections are adequate, as detailed in the current General Permit, assuming that site conditions or potential impacts to stormwater discharges have not changed. As such, we are requesting that the draft General Permit be modified to only require more frequent than annual inspections when site conditions or potential stormwater impacts have changed.

Appendix J – III. Monitoring Requirements, etc.

Appendix J (Additional Facilities) sites had previously been excluded from completing stormwater monitoring in the current General Permit as site inspections had been allowed instead of monitoring. We believe that inspections are still a viable method to evaluate conditions that might impact stormwater discharges. Alternately, we are requesting that Appendix J facilities only be required to complete visual monitoring of stormwater discharges (rather than analytical testing) to evaluate water quality characteristics (e.g. color, odor, clarity, solids, foam, and oil sheen). As such, we are requesting that either site inspections continue to be allowed in lieu of

completing stormwater monitoring or visual monitoring of discharge be required as noted above for Appendix J subject facilities.

Appendix K – III. Monitoring Requirements

In Appendix K, we understand that PA DEP has made a distinction between “large stockpiles” (at least 3,000 tons) and “small stockpiles” (less than 3,000 tons). The General Permit includes new benchmark levels that may be appropriate for the sites with small stockpiles. However, based on experience with intermodal bulk salt storage sites (i.e. large stockpiles), we believe that these benchmark levels are not practical. Specifically, we do not believe that large stockpiles would be capable of achieving the benchmark levels established for Total Suspended Solids (TSS) (100 mg/L) or Total Dissolved Solids (TDS) (2,000 mg/L) based on current Best Management Practices (BMPs) established for the bulk salt industry.

As such, we are requesting that the General Permit exclude registration by “large stockpile” facilities. We believe that stormwater discharges associated with these bulk salt stockpiles would more appropriately be covered by an individual NPDES permit that includes BMPs based on unique conditions at each site. Otherwise, the proposed benchmarks establish an unreasonable expectation for bulk deicing salt facilities that may result in hindering the viability of these sites which clearly serve an important role in public safety during winter months.

Appendix K – IV.A. - BMPs - Cover

New language has been added regarding the surface for salt stockpile storage and loading/unloading: “on a synthetic, impermeable surface (e.g. concrete, HDPE or other materials).” We are requesting that the term “impermeable” be removed as most man-made surfaces made for salt storage cannot meet the technical definition it implies. Further, we are requesting that the term “bituminous concrete” or “asphalt” be added to the list of example surface materials.

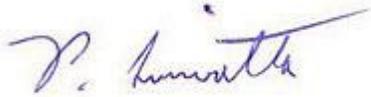
Appendix K – IV.C. – BMPs - Stormwater Management

New language has been added regarding recycling collected stormwater: “The facility must recycle collected stormwater that may have come into contact with salt materials to the maximum extent practical.” We are requesting that this language be removed from the permit as we are unable to identify a practical recycling application that would be appropriate for this stormwater.

Closing

We appreciate the opportunity to provide comments on the draft permit. If you should have any questions or comments, please contact us at 203.458.7200.

Sincerely,



Paul Simonetta, CHMM
Senior Project Manager



Christopher E. Marchesi
President

cc: Paul McDermott, Morton Salt, Inc.
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Ref. No. 104018L63