Annual Report for Year 1 (2023-2024) of the Time Limited Water Quality Standard for Chloride

May 30, 2024

Prepared by Ozinga Ready Mix – Lumber Street





Ozinga Ready Mix is a member of the Chicago Area Waterways Chloride Workgroup



1.0 Introduction to Chloride Issue in CAWS/LDPR

This Pollutant Minimization Plan (PMP) has been prepared by Ozinga Ready Mix to reduce the environmental impacts from the organization's chloride related operations. Ozinga Ready Mix is a discharger covered under the Time Limited Water Quality Standard for Chloride for the Chicago Area Waterways System and Lower Des Plaines River watersheds. This PMP has been prepared to meet the requirements laid out in the Time Limited Water Quality Standard (TLWQS) for Chloride. The term of this PMP covers the first 5-years of the TLWQS period and will be updated following the re-evaluations at Years 4 ½, 9 ½, and 14 ½.

Chloride is a permanent pollutant. It does not degrade over time and continues to accumulate in the environment. Proactive measures to reduce the amount of chloride discharged can help reduce the impacts from chloride on receiving waterways and the environment. Chloride impacts aquatic life, vegetation, and infrastructure. As the chloride concentrations increase and our waters become saltier, aquatic and plant biodiversity decreases and native species are overtaken by salt tolerant invasive species.

Chlorides are commonly found in road salt, fertilizers, water softeners, dust suppressants, and certain industrial processes. Chloride-based deicers, like rock salt, are used on parking lots, sidewalks, and roads to provide safe surfaces to the public during the winter months. These deicers are one of most common sources of chloride in the Chicago region.

The water quality standard for chloride for the Chicago Area Waterway System (CAWS) was updated as part of the rulemaking process related to changing the designated use of the CAWS. The chloride standard was updated from 1,500 mg/L during the winter and 500 mg/L during the summer to 500 mg/L all year round. The change in the chloride water quality standard took effect in 2018. Because portions of the CAWS were not going to meet this new standard due to the need to maintain public safety on roads, highways, sidewalks and parking lots during the winter months, a joint submittal and supporting individual petitions were submitted between 2015 and 2018 to the Illinois Pollution Control Board for a variance from the chloride standard. The joint petition laid out best management practices that can be achieved by the petitioners to reduce their chloride use while maintaining public safety during winter storms. In addition to the CAWS, portions of the Lower Des Plaines River watershed were included as it receives water from the CAWS.

On November 4, 2021, the IPCB issued an Opinion and Order for a Time Limited Water Quality Standard (TLWQS) for Chloride for portions of the CAWS and Lower Des Plains River watersheds. The TLWQS for Chloride watersheds are defined in the Opinion and Order as the Des Plaines River watershed from the Kankakee River to the Will County Line (except for the DuPage River watershed) and the CAWS watershed (except the North Branch Chicago River watershed upstream of the North Shore Channel and those portions of the watershed located in Indiana). This is a watershed-based approach to reduce the chloride concentrations in the CAWS and Lower Des Plaines River. The TLWQS for Chloride requires all dischargers covered under the TLWQS for Chloride to create PMPs and implement specific best management practices based on their operations to reduce their chloride discharges.

2.0 Organization, Facility Information

Agency Name: Ozinga Ready Mix			
Facility Name: Ozinga Ready Mix Permit Number: IL103041			
Facility Address: 2255 South Lumber Street			
City: Chicago State: Illinois Zip Code: 60616			

2.1 Level of Service for Winter Maintenance Activities

3.0 Best Management Practices

Details regarding Ozinga Ready Mix's implementation of the best management practices (BMPs) identified as part of the TLWQS for Chloride are included below.

Workgroup BMP

ВМР	Agency Description of Current Implementation or Status Update to the Plan to Implement the BMP	
The permittee must participate in a Chlorides workgroup for the CAWS or LDPR, depending on the watershed within which the facility's discharge is located.	Ozinga Ready-Mix has been a member of the Lower Des Plaines Watershed Group since 2022. Staff has attended regular meetings and training sessions.	

Salt Storage and Handling BMPs

ВМР	Agency Description of Current Implementation or Status Update to the Plan to Implement the BMP	
Store all salt on an impermeable	All salt is stored on impermeable pads or bags.	
pad that must be constructed to		
ensure that minimal stormwater		
is coming into contact with salt		
unless the salt is stored in a		
container that ensures		
stormwater does not come into		
contact with the salt.		
Cover salt piles at all times	Salt is covered by Ozinga Ready-Mix unless it is in active use.	
except when in active use,		
unless stored indoors.		
For working areas, provide	The site is sloped so stormwater does not flow directly into the	
berms and or sufficient slope to	river.	
allow snow melt and		
stormwater to drain away from		
the area. If snow melt and		
stormwater cannot be drained		
away from the working area,		

channeling water to a collection	
point such as a sump, holding	
tank or lined basin for	
collection, discharge at a later	
time, use for prewetting, and	
use for make-up water for brine	
must be considered.	
MS4/CSO Only - Use deicing	N/A
material storage structures for	
all communities covered under	
General Permit ILR40 for MS4	
communities.	
Good housekeeping practices	Ozinga Ready-Mix uses good housekeeping practices for winter
must be implemented at the	road salt related work including loading, salt deliveries, and facility
site, including:	inspections.
cleanup of salt at the end of	
each day or conclusion of a	
storm event;	
 tarping of trucks for 	
transportation of bulk	
chloride;	
 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 work area;	
 removing surplus materials 	
from the site when winter	
activity finished where	
applicable;	
 annual inspection and 	
repairs completed when	
practical;	
evaluate the opportunity to	
reduce or reuse the wash	
water.	

Winter Maintenance Operations BMPs

ВМР	Agency Description of Current Implementation or Status Update	
DIVIP	to the Plan to Implement the BMP	

Calibrate all salt spreading equipment at least annually before November 30th. Records of the calibration results must be maintained for each piece of spreading equipment.	Salt is applied by hand or through a push spreader. Ozinga Ready-Mix will minimize the salt used at the site while tracking the amount used.
Pre-wet road salt before use, either by applying liquids to the salt stockpile, or by applying liquids by way of the spreading equipment as the salt is deposited on the road.	Ozinga Ready-Mix will look to implement this practice in the future, but most salt is pre-bagged and applied by hand.
Use equipment to measure the pavement temperature unless such equipment has already been installed on road salt spreading vehicles.	Ozinga Ready-Mix observed conditions of the ground to determine if the temperature is above or below 32F.
Develop and implement a protocol to vary the salt application rate based on pavement temperature, existing weather conditions, and forecasted weather conditions.	Ozinga Ready-Mix observed conditions of the ground to determine if salt should be applied.
Track and record salt quantity used and storm conditions from each call-out.	The amount of salt used at each occurrence was recorded.
Develop a written plan for implementation of anti-icing, with milestones. The plan should consider increased use of liquids (e.g., carbohydrate products) beginning with critical locations such as bridges over streams.	Ozinga Ready-Mix used Anti-Icing measures as part of its winter operations. Information will be provided in the facility's Snow and Ice Plan.
Provide employees involved in winter maintenance operations with annual training before November 30th on best management practices in the use of road salt in operations, including the practice of plowing first and applying salt only after snow has been cleared.	Ozinga Ready Mix completed Annual Training in October 2023. Annual training will continue in future years.
Be responsible for complying with all applicable BMPs even when deicing practices are contracted out and ensure that	Ozinga Ready Mix will assure contractors will perform BMPs when applicable.

contractors are property trained and comply with all applicable BMPs.	
Complete an annual report, as	Ozinga Ready-Mix will complete and submit an annual report each
required by paragraph 3(B) of	year to IEPA and the workgroup by July 1.
this order, which is standardized	, , ,
in an electronic format and	
submitted to the IEPA's website	
and to the watershed group.	
Obtain and put into place	All applicable measures have been implemented.
equipment necessary to	The approach the second of the
implement all salt	
spreading/deicing measure	
specified in this BMP, such as	
any new or retrofitted salt	
spreading equipment necessary	
to allow for pre- wetting and	
proper rates of application.	
MS4/CSO/IDOT/TOLLWAY Only	N/A
- Install equipment to measure	IV/A
the pavement temperature on	
the winter maintenance fleet for	
a sufficient number of vehicles	
to provide sufficient information	
to adjust application rates for	
the most efficient levels.	
Develop and complete a plan to	
equip the winter maintenance	
fleet before the first re-	
evaluation.	
MS4/CSO/IDOT/TOLLWAY Only	N/A
- Before the first re-evaluation,	IV/A
develop a method for	
conducting a post-winter review	
to identify areas of success and	
areas in need of improvement.	
Items to be completed as part of	
the review must include, but are	
not limited to, an evaluation of	
each salt spreader's application	
rate, variations in application	
rates, and discussion of the	
variation compared to the	
recommended rates. Once	
developed, the review should	
occur annually in the	
spring/early summer following	
each winter season.	
each willer season.	

Additional BMPs Identified for Agency/Facility

ВМР	Agency Description of Current Implementation	
N/A	N/A	

3.1 Analysis of BMPs Implemented

The BMP's implemented limited chloride exposure to outfalls for the Winter 2023-2024 season.

3.2 Analysis of Alternative Treatments or New Technology

N/A

4.0 Deicing/Anti-Icing Agents Used

Rock salt was used by Ozinga Ready-Mix for the 2023-24 winter season for deicing purposes:

4.1 Application Rates

The application rates used by Ozinga Ready-Mix for the 2023-2024 winter season were estimated. These can be seen in the attached tables.

4.1.1 Application Rate Analysis

The application rates used by Ozinga Ready-Mix for the 2023-2024 winter season were estimated. These can be seen in the attached tables.

4.2 Application Practices

Ozinga Ready-Mix uses the following practices to apply deicing and anti-icing Ready-Mix:

- Hand distribution
- Truck distribution

4.3 Call Outs

Call out days were tracked and/or estimated for the 2023-2024 Winter Season.

4.4 Use of Liquids

Liquids were not used in the 2023-2024 Winter Season.

5.0 Training

Ozinga Ready-Mix completed annual training in October 2023.

6.0 Deicing and Snow Removal Equipment

Ozinga Ready-Mix applies road salt by hand distribution and/or salt spreader.

7.0 Material Storage

Ozinga Ready Mix maintains a number of storage areas. A map of the site and its respective Ready-Mix are attached to this report.

8.0 Capital Purchases

There have been no capital purchases related to salt treatment equipment.

8.1 Explanation of Capital Purchases Unable to Be Made According to the Reported Plan

Not applicable

9.0 Environmental Monitoring Data

Chloride monitoring data is collected for the CAWS and Lower Des Plaines River watersheds per the IPCB order. The data is maintained by the workgroups. Chloride data for the CAWS is collected by MWRD for the CAWS watershed and provided to the workgroups as part of the annual reporting as required by the IPCB order. The Lower Des Plaines Watershed Group also maintains a USGS monitoring station in the Des Plaines River at Channahon, IL that collects continuous conductivity data to estimate chloride concentrations.

Chloride monitoring data reports are posted to https://www.cawswatershed.org/reports/ and https://ldpwatersheds.org/about-us/lower-des-plaines-watershed-group/our-work/chloride-tlwqs/.

9.1 Organization Specific Chloride Monitoring Data

No sampling is required for this site.

9.2 Changes to the Facility's NPDES Treatment Technologies for Chloride

Not applicable.

10.0 Program Evaluation

10.1 Proposed Steps for the Coming Year

- Perform required training
- Monitor salt usage
- Analyze BMP's.

11.0 Workgroup Participation

Ozinga Ready-Mix will continue to participate in the CAWS Workgroup in the upcoming year.

Ozinga Ready Mix Salt Quantity Usage - Chinatown

Callout Date	Time	Pavement Temperature	Quantity of Salt Used on-site
11/27/2023	Varies	Around Freezing Temperatures	Est. 4,000 lbs
12/4/2023	Varies	Around Freezing Temperatures	Est. 4,000 lbs
12/5/2023	Varies	Around Freezing Temperatures	Est. 4,000 lbs
1/8/2024	Varies	Around Freezing Temperatures	Est. 4,000 lbs
1/11/2024	Varies	Around Freezing Temperatures	Est. 4,000 lbs
2/15/2024	Varies	Around Freezing Temperatures	Est. 4,000 lbs
3/22/2024	Varies	Around Freezing Temperatures	Est. 4,000 lbs

Calibration Records

Date	Type of Equipment	Amount of Salt Spread per Time Period	Initials
Estimate*	Push Salt Spreader	50 lbs/min	MS
Estimate*	Hand Spreader	25 lbs/min	MS

