

#### INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

NPDES / WQM Permit No. M	/lo/Day/Year	Entry Tim	e Exit Time	Inspection Type	eFACTS Inspection ID
PA0002208	7/10/19	0900	1200	CEI	2909326
Facility Name: Shell Chemical Appalachia Petroche	emicals Complex		Permittee N	ame: Shell Chemical Appalac	hia LLC
Physical Location Address/Directions			 ca PA 15061		
1 Hydiodi Eddallott / Idai 200/2110011511	5. OOO F TURNOTE	Noau mona.	Jain 1000.		
Permittee Address: 300 Frankfort Ro	oad Monaca PA	15061	W-12-11-11-11-11-11-11-11-11-11-11-11-11-	Permit Expiration Date:	6/30/20
				Renewal Due Date:	1/2/20
Municipality:	County:			Type(s) of IW Discharge(s):	-
Potter Township	Beaver			Groundwater/Stormwater (I	WTP in construction)
Responsible Official: H. James Sewe	ell		Facility Rep	resentative: Jason Schultz	
Title: Environmental Manager			1	nmental Engineer Waste and	Water
Business Phone: 724-709-2411			Business Ph	none: 724-709-2501	
Cell Phone: 281.731.3287			1	814-227-8934	
Email: jim.sewell@shell.com			Email: jason	n.schultz2@shell.com	•
24-Hour Emergency Contact Person	/ Phone / Email	: Shell Secu	rity 412-728-	0126	•
VIOLATIONS*: ☐ Yes ☐ None Identified During Inspection ☐ Pending Results of Sample Analysis					
Violations of effluent limits in Part A of the NPDES Permit [25 Pa. Code 92a.44]. Explanation was given in eDMR regarding					
violations. No further response is necessary. It has been over a year since the last DMR violation.					
·					
					continued on page B
Recommendations/Comments:					
Second Notice: Ensure that the rattached document and Part C.III.B of	new Stormwater	Annual Rep	ort template is	used for the next submission	due 5/1/19. (See
indicated in Part C.III.D.			ริย สเรีย กับเฮ แ	nat Semi-Annuai mspections a	are now required, as
Clean out sediment from outfalls					
Improve BMP of socks near the fi Address slippage issue at 376 so			of outfall UZ1.		
D-year Interviewed:	Data		Lizznostori		D-45.
Person Interviewed: Jason Schultz	Date: 7/10/		Inspector: Shawn P. E	Rell	Date: 7/10/19
Signature:		e No.:	Signature:	~ ~ ~ ~ ~ ~	Phone No.:
[Report sent by Email]	1	709-2442		IN P BELL	412-442-4051
Title: Environmental Engineer Waste	and Water		Title: Water	Quality Specialist	
Email: jason.schultz2@shell.com			Email: shaw	bell@pa.gov	
This document is official notification that a inspection are shown above and on any discovered upon examination of the result	attached pages. *A	Any violations v	which were noted	d during the inspection are indicate	

#### INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

#### Comments

This compliance evaluation inspection was conducted for routine monitoring.

Present on behalf of Shell were Jason Schultz Environmental Engineer; Jim Sewell, Environmental Manager; Kimberley Kaal, Environmental Regulatory Lead, Tracey Smith, Environmental Technician, Bechtel, and Shawn P. Bell, Water Quality Specialist, PA DEP.

#### **ADMINISTRATIVE REVIEW:**

The facility has a valid NPDES Permit, which was amended for a second time on August 17, 2018. The Part II permit #0417201 was amended on Jan 25, 2019. Annual stormwater report needs to be submitted on the new form.

The following exceedances were indicated on electronic DMRs submitted for monitoring periods of April 2018 through June 2019:

<u>Parameter</u>	Monitoring <u>Period</u>	<u>Outfall</u>	Reported Value	Permit Limit
Total Residual Chlorine (TRC) (Instantaneous Maximum Concentration)	April 2018	108	0.66 mg/L	0.05mg/L
Total Residual Chlorine (TRC) (Instantaneous Maximum Concentration)	May 2018	108	0.15 mg/L	0.05 mg/L

The exceedance at Outfall 108 was attributed to source water for hydrostatic testing of HDPE fire water lines. Corrective actions were indicated in the comment section on each eDMR. A violation is noted for these exceedances, as indicated on Page 1. No further explanation is necessary

#### **SITE INSPECTION:**

- -Construction of the main works site was in progress, along with the IWTP. Construction of the storm sewer system. was also nearing completion. Construction of the in-ground tank for the amendment to the Part II permit was started.
- -There will be a phased start up at the site. The IWTP will be on line first.
- -The facility uses water as a dust suppressant and routinely does street sweeping to minimize the dust/solids. exposure. They also ensure all vehicles depart the site from one gate to go through a wheel was to reduce. dust/solids from leaving the site.
- -The fuel and truck wash out areas were well maintained. Solids from these operations are hauled off site. There are spill kits located throughout the facility.
- -Separate PPC plan is used for construction. A new PPC plan will be used once site is operational.
- -Outfall 006, 007, 010, 012 appeared to have a large amount of sediment and need cleaned out. There was no discharge currently at any of the outfalls.
- -Outfall 005 discharge appeared clear.
- -Outfalls 016, 013, 008 were not discharging.
- -Outfall 004 was still under construction.
- -Outfall 021 needed some better housekeeping near the fill upstream. The sock should be extended to capture solids off the site.
- There is a significant amount of slippage at the Monaca exit off 376 traveling south to route 18 that should be addressed. It is near the power lines.
- -Facility personnel had questions regarding testing at Outfall 015. Questions should be addressed to the Department Engineer, Ryan Decker at <a href="mailto:rydecker@pa.gov">rydecker@pa.gov</a> or (412)442-4144.
- Interim Stormwater Treatment Facility is no longer utilized.

Page 2 of 13 Date: 7/10/19 Permit No.: PA0002208



### INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Facility Description & Regulated Activities	
<u>Industrial Activity</u> : Construction/Pre-Commissioning of petrochemical complex for polyethlyene production <u>SIC / NAICS Code(s)</u> : SIC 3339	
Wastewater/contaminant source(s): Stormwater & surface runoff exposure during construction activity	
Planned changes in production and/or industrial activities since last insp:	⊠ N/A
Changes in treatment and/or to facility since last insp:	⊠ N/A
Changes in wastewater quantity or quality since last insp:   new pollutants  Increased flow or conc.	⊠ N/A
Sanitary discharge to: ☐ On-site STP, outfall/permit #: ☐ with IWW ☐ Onlot ☒ Public sewer ☐ Other:  Sewage Compliance Inspection Report attached: ☐ Yes ☒ No ☐ Separate inspection conducted	
Removed substances:  ☐ Treatment sludge ☐ Backwash solids ☐ Screenings ☐ Spent mat'l/media ☒ Other:	
Hauling/Disposal to: Carbon Limestone Landfill by: Republic Services per permit # 28726 (Part C I. B.)	
Facility/Activities Notes: Tire truck water and cement was hets shipped off site. Industrial process remains under constructio	n.
Compliance & Enforcement History	□ N/A
Schedule in Permit: ☐ Yes ☐ N/A In compliance with schedule: ☐ Yes ☐ No ☐ could not do	confirm
<u>Violations</u> : Last 12 months or since last inspection:	
Enforcement Actions: Last 12 months or since last CEI:   ☐ Yes ☐ No ☐ N/O	
<u>Legal Agreement</u> : Consent Order & Agreement, Consent Decree or Order executed: ☐ Yes ☒ No ☐ N/O	□ N/A
Date executed: Obligation(s) due next: Date due:	
In compliance with legal agreement: ☐ Yes ☐ No ☐ could not c	confirm
Compliance & Enforcement Notes: Compliance schedule is associated with IMP 101 as Outfall 001, which is not yet active.	
Monitoring (NPDES Permit Part A / WQM Pe	
	ermit)
Influent/Intake sampling location & observations: Multimedia filter on Interim Stormwater Treatment System  ☑ N/O	
	□ N/A
<u>Influent/Intake</u> sampling location & observations: Multimedia filter on Interim Stormwater Treatment System   ☑ N/O	□ N/A □ N/A
Influent/Intake sampling location & observations: Multimedia filter on Interim Stormwater Treatment System	□ N/A □ N/A
Influent/Intake sampling location & observations: Multimedia filter on Interim Stormwater Treatment System       N/O         Effluent/Discharge sampling location: Outfalls as applicable       After all treatment: Yes No No       N/O         Instream sampling location(s) & observations:       N/O         Sample Collection: Manually       Auto sampler, T: , controlled by: Flow meter Other       Other         Type: Grab B-hour comp       24-hour comp Other       Min. aliquot ≥100 ml: Yes No No	□ N/A □ N/A
Influent/Intake sampling location & observations: Multimedia filter on Interim Stormwater Treatment System       N/O         Effluent/Discharge sampling location: Outfalls as applicable       After all treatment: Yes No No       N/O         Instream sampling location(s) & observations:       N/O         Sample Collection: Manually       Auto sampler, T: Other       Controlled by: Flow meter Other         Type: Grab Shour comp       4-hour comp Other       Min. aliquot ≥100 ml: Yes No No         Composites: Flow proportional       Time proportional       Not proportional	□ N/A □ N/A
Influent/Intake sampling location & observations: Multimedia filter on Interim Stormwater Treatment System       N/O         Effluent/Discharge sampling location: Outfalls as applicable       After all treatment:       Yes No N/O         Instream sampling location(s) & observations:       N/O         Sample Collection:       Manually Auto sampler, T: , controlled by: Flow meter Other         Type:       Grab Shour comp 24-hour comp Other Min. aliquot ≥100 ml: Yes No N/O         Composites:       Flow proportional Time proportional Not proportional         Sample location, collection, frequency, measurements representative of the monitored activity:       Yes No N/O	□ N/A □ N/A
Influent/Intake sampling location & observations: Multimedia filter on Interim Stormwater Treatment System       N/O         Effluent/Discharge sampling location: Outfalls as applicable       After all treatment: Yes No No       N/O         Instream sampling location(s) & observations:       N/O         Sample Collection: Manually       Auto sampler, T: , controlled by: Flow meter Other       Other         Type: Grab Shour comp       4-hour comp Other       Min. aliquot ≥100 ml: Yes No NO         Composites: Flow proportional       Time proportional Not proportional         Sample location, collection, frequency, measurements representative of the monitored activity:       Yes No NO         Sample Handling & Analysis:       Properly preserved during collection, storage and shipping:       Yes NO	□ N/A □ N/A
Influent/Intake sampling location & observations: Multimedia filter on Interim Stormwater Treatment: System       N/O         Effluent/Discharge sampling location: Outfalls as applicable       After all treatment: Yes No No       N/O         Instream sampling location(s) & observations:       N/O         Sample Collection: Manually       Auto sampler, T: , controlled by: Flow meter Other       Other         Type: Grab Shour comp As-hour comp Other       Min. aliquot ≥100 ml: Yes No NO       Yes No NO         Composites: Flow proportional Time proportional Not proportional       Not proportional       Yes No NO         Sample location, collection, frequency, measurements representative of the monitored activity:       Yes No NO         Sample Handling Analysis:       Properly preserved during collection, storage and shipping:       Yes No NO         Storage temperatures recorded using NIST traceable thermometer:       Yes NO NO	□ N/A □ N/A
Influent/Intake sampling location & observations: Multimedia filter on Interim Stormwater Treatment System       N/O         Effluent/Discharge sampling location: Outfalls as applicable       After all treatment:       Yes No       N/O         Instream sampling location(s) & observations:       N/O         Sample Collection:       Manually       Auto sampler, T:       , controlled by:       Flow meter       Other         Type:       Grab       8-hour comp       24-hour comp       Other       Min. aliquot ≥100 ml:       Yes       No       N/O         Composites:       Flow proportional       Time proportional       Not proportional       Yes       No       N/O         Sample location, collection, frequency, measurements representative of the monitored activity:       Yes       No       N/O         Sample Handling & Analysis:       Properly preserved during collection, storage and shipping:       Yes       No       N/O         Storage temperatures recorded using NIST traceable thermometer:       Yes       No       N/O         Analyzed within the required holding time:       Yes       No       N/O	□ N/A □ N/A
Influent/Intake sampling location & observations: Multimedia filter on Interim Stormwater Treatment System       N/O         Effluent/Discharge sampling location: Outfalls as applicable       After all treatment: Yes No       N/O         Instream sampling location(s) & observations:       N/O         Sample Collection: Manually       Auto sampler, T: , controlled by: Flow meter Other       Other         Type: Grab S-hour comp       24-hour comp Other       Min. aliquot ≥100 ml: Yes No       Yes No       N/O         Composites: Flow proportional       Time proportional       Not proportional       Yes No       N/O         Sample location, collection, frequency, measurements representative of the monitored activity:       Yes No       N/O         Sample Handling & Analysis:       Properly preserved during collection, storage and shipping: Yes No       Yes No       N/O         Analyzed within the required holding time:       Yes No       N/O         Parameters analyzed, test methods, sample frequencies & types in accordance with permit:       Yes No       No	□ N/A □ N/A ⊠ N/A
Influent/Intake sampling location & observations: Multimedia filter on Interim Stormwater Treatment       System       N/O         Effluent/Discharge sampling location: Outfalls as applicable       After all treatment: Yes No       N/O         Instream sampling location(s) & observations:       N/O         Sample Collection: Manually       Auto sampler, T: , controlled by: Flow meter Other       Other         Type: Grab 8-hour comp Other Min. aliquot ≥100 ml: Yes No NO       Yes No NO         Composites: Flow proportional Sample location, collection, frequency, measurements representative of the monitored activity: Yes No NO       Yes No NO         Sample Handling & Analysis: Properly preserved during collection, storage and shipping: Analysed within the required holding time: Analyzed within the required holding time: Yes No NO       Yes No NO         Parameters analyzed, test methods, sample frequencies & types in accordance with permit: Yes No NO       N/O         Monitoring systems: SCADA PLC Continuous meter for       Calibrated: Yes No NO	□ N/A □ N/A ⊠ N/A
Influent/Intake sampling location & observations: Multimedia filter on Interim Stormwater Treatment       System       N/O         Effluent/Discharge sampling location: Outfalls as applicable       After all treatment:       Yes No NO       N/O         Instream sampling location(s) & observations:       N/O         Sample Collection: Manually       Auto sampler, T: Other       Controlled by: Flow meter Other       Other         Type: Grab Shour comp Other Min. aliquot ≥100 ml: Sample Iocation, collection, frequency, measurements representative of the monitored activity: Yes No N/O       N/O         Sample Handling & Analysis: Properly preserved during collection, storage and shipping: Storage temperatures recorded using NIST traceable thermometer: Yes No N/O       N/O         Analyzed within the required holding time: Parameters analyzed, test methods, sample frequencies & types in accordance with permit: Yes No N/O       N/O         Monitoring systems: SCADA PLC Continuous meter for Calibrated: Yes No N/O       N/O         On-site Analysis: PH DO TRC T NPDES parameters Process control       N/O	□ N/A □ N/A □ N/A □ N/A □ N/A
Influent/Intake sampling location & observations: Multimedia filter on Interim Stormwater Treatment System       ☑ N/O         Effluent/Discharge sampling location: Outfalls as applicable       After all treatment: ☑ Yes ☐ No ☐ N/O         Instream sampling location(s) & observations: ☐ N/O         Sample Collection: ☑ Manually ☐ Auto sampler, T: ☐ Other       ☐ Other         Type: ☑ Grab ☐ 8-hour comp ☐ 24-hour comp ☐ Other ☐ Min. aliquot ≥100 ml: ☐ Yes ☐ No ☐ N/O         Composites: ☐ Flow proportional ☐ Time proportional ☐ Not proportional       ☐ Yes ☐ No ☐ N/O         Sample location, collection, frequency, measurements representative of the monitored activity: ☐ Yes ☐ No ☐ N/O         Sample Handling & Analysis: Properly preserved during collection, storage and shipping: ☐ Yes ☐ No ☐ N/O         Analyzed within the required holding time: ☐ Yes ☐ No ☐ N/O         Parameters analyzed, test methods, sample frequencies & types in accordance with permit: ☐ Yes ☐ No ☐ N/O         Monitoring systems: ☐ SCADA ☐ PLC ☐ Continuous meter for ☐ Calibrated: ☐ Yes ☐ No ☐ N/O         Meters calibrated: ☐ PH: ☐ Yes ☐ No ☐ N/O ☐ N/A ☐ DO: ☐ Yes ☐ No ☐ N/O	□ N/A
Influent/Intake sampling location & observations: Multimedia filter on Interim Stormwater Treatment: System	□ N/A
Influent/Intake sampling location & observations: Multimedia filter on Interim Stormwater Treatment System	N/A
Influent/Intake sampling location & observations: Multimedia filter on Interim Stormwater Treatment: System	N/A
Influent/Intake sampling location & observations: Multimedia filter on Interim Stormwater Treatment System	N/A
Influent/Intake sampling location & observations: Multimedia filter on Interim Stormwater Treatment: System	N/A
Influent/Intake sampling location & observations: Multimedia filter on Interim Stormwater Treatment System	N/A

Page 3 of 13 Date: 7/10/19 Permit No.: PA0002208



### INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Recordkeeping (	NPDES Permit Part A / WQM Permit)
Monitoring Records: Retained on-site / Up to date	e: ☐ Yes ☐ No ☒ N/O
Required info recorded: collector, location, sample date/time, analyst, method/QL, result	s: 🗌 Yes 🗌 No 🔯 N/O
Data are consistent with data from monitoring system(s) and as reported on the DMF	t: ☐ Yes ☐ No ☒ N/O
Records reviewed / parameters confirmed on-site:	
On-Site Logs: Daily operations log: ☐ Yes ☐ No ☒ N/O Up-to-date	e: 🗌 Yes 🗌 No 🔯 N/O 🗎 N/A
Includes: 🗌 Visual observations 🔲 Process adjustments 🔲 Problems and	concerns
Routine maintenance log: ☐ Yes ☐ No ☒ N/O Repair log	g: ☐ Yes ☐ No ☒ N/O
Records, Reports, Logs available: Yes No Retained (3 years	): ⊠ Yes □ No □ N/O
Permit(s) at the facility:	⊠ Yes □ No □ N/O
Permit terms and conditions reviewed by responsible official and/or facility representative:	⊠ Yes □ No □ N/O
Recordkeeping Notes:	i
	IPDES Permit Part A / WQM Permit)
	ıe: ☐ Yes ☐ No ☒ N/O
•	ly: ⊠ Yes □ No □ N/O
	ts: ⊠ Yes □ No □ N/O
Monitoring period reviewed: mon(s)/yr: May 2018/June 2019 Parameters assessed:	
Annual Report: Date received: May 1, 2019 On time	ne: ⊠ Yes □ No □ N/O □ N/A
Date reviewed: 7/10/19 Report complete & acceptab	le: ⊠ Yes □ No □ N/O □ N/A
Notifications to DEP: Planned changes/alterations to production/process reported	ed: ⊠ Yes □ No □ N/A
Planned changes/alterations to treatment reported	ed: ☐ Yes ☐ No
Incident reporte	ed: ⊠ Yes □ No □ N/A
Other required notifications:	☐ Yes ☐ No
Reporting Notes: The request to uitilize the new inspection format was made in the last insperecommendation on Page 1 regarding new requirements for Annual Stormwater Report and usubmittal.	
Flow Measurement (NPDES Perr	nit Part A / WQM Permit)
Location(s): Multiple outfalls Effluent measured after all withdrawal	s: Yes No NO NO NA
System/Device(s):  Full Pipe  Flume, uniform flow, free of debris/deposit	s: ☐ Yes ☐ No ☐ N/O
☑ Weir, clean with nappe spac	e: ⊠ Yes □ No □ N/O
Meter: ☐ Ultrasonic ☐ Transducer ☐ Magnetic ☐ Bubbler ☐ Float ☐ Other:	
Inspected:  Daily  Weekly  Other: Location:	Maximum meter range: MGD
Recorder: Totalizer Daily Chart 7-Day Chart SCADA/Electronic Other:	:
Capable of recording design flow:  Yes  No Ca	alibration Range:
Meter/Recorder Operable: ☐ Yes ☐ No Maintained (meter, clean & clean	r): ☐ Yes ☐ No ☐ N/O
Issues with measurement / recording:	s: No NO
Calibration frequency: ☐ Semi-annual ☐ Annual ☐ Other: Date of last calibration	n: (N/O)
Flow Measurement Notes: .Flow data for other discharge points is calculated on Annual Store at Outfall 005 weir were OK.	nwater Inspection Report. Condititions

Page 4 of 13

Date: 7/10/19



#### INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

	Chen	nical Add	litives	(NPDES Per	mit Parts B & C / WQM Permit) N/A
Production/process chemical addi Name(s), purpose:	itives used	d for cleanir	ng, disinfecti	ion, maintenance:	⊠ Yes □ No □ N/O □ N/A
☐ Chemical Additives Usage for New chemicals & cha	inges to p	ed roduct nam	e or formula	itives Usage form sub Additive(s) in use appations submitted & appatenticted to maximul	oroved: ⊠ Yes □ No □ N/O oroved: ⊠ Yes □ No □ N/O □ N/A
	·				
Treatment Units/Equip	ment &	Treatme	nt Chemi	icals (NPDE	ES Permit Part B / WQM Permit) N/A
As-built drawings on-site: Y Units/Equipment per permit: Y	es □ No		Tr		als used: ☐ Yes ☐ No ☒ N/O ☐ N/A uthorized: ☐ Yes ☐ No ☒ N/O
Onto / Equipment per permit.	C3	2 14/0	]	Date Inoperable /	anonzea. El 163 El 140 Mayor
Treatment Unit or Equipment	Total	On-Line	Not Operable	Date Expected to Return to Service	Observations/Comments Chemical(s) Used & Purpose
West Pond	1	1	0		
AC Pond	1	1	0		
				· · · · · · · · · · · · · · · · · · ·	
			·		
					· .
		-	,		
Treatment Unit / Equipment Notes	\ <u>'</u>				
Trodution Only Equipment Notes					

Page 5 of 13 Date: 7/10/19 Permit No.: PA0002208



#### INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

	Operations &	Maintenance: Treatmer	nt Plant / Equipment 🖂 N/A
O&M Manuals:			Available: ☐ Yes ☐ No ☐ N/O
Staff Schedule:   24/7	☐ Weekday hou	ırs: to 🔲 Week	end/Holiday hours: to
Plant check schedule:			
Certified Operator: Requ	ired: 🗌 Yes 🖾 N	10	On staff: ☐ Yes ☐ No
Stand-by Power: Eme	ergency generator	☐ Dual power feed ☐ Oth	er: N/A
Exercise frequency:			Exercised under load:  Yes No No N/O
Maintenance frequency	*		System operable: ☐ Yes ☐ No ☐ N/O
<u>Alarm System</u> : ☐ Auto [	Dialer 🗌 SCADA	☐ PLC ☐ Other:	□ N/A
Test frequency:	Alarm triggers:		Operable: ☐ Yes ☐ No ☐ N/O
Maintenance:		Major repair / replacen	nent since last inspection:  Yes No No N/O
Repairs:		Spare	parts inventory available: ☐ Yes ☐ No ☐ N/O
Replacements:		Standb	oy units available & ready: ☐ Yes ☐ No ☐ N/O
Treatment Plant/Unit Byp	ass: Since last ins	spection: Yes No No	O Reported to DEP: Yes No N/A
Unit(s) bypassed:	Cause/reason:	Discharge to:	
O&M Treatment Plant No	tes: Treatment cur	rently consists of stormwater re	etention only.
	Treatme	nt Processes & Process	Control 🖂 N/A
Treatment Processes:	Biological P	hysical 🔲 Chemical 🛛 Oth	er: (Stormwater monitoring only)
Description:			
Solids Management: Ann	nual production: N/	A	
Discharge:	ıs	Seasonal	Design Flow: MGD
☐ Batch, #/day:	duration each:	volume each:	
Frequency: Hours/day:	Days/wee	ek:	
Parameter / Test /	Test or Check		
Measurement	Frequency	Test Result / Finding	Comments
Process & Control Notes:			

Page 6 of 13 Date: 7/10/19 Permit No.: PA0002208



### INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Effluent	Receiving Water Evaluation	ı		
Outfall #: 005 Stream: Ohio River				
Effluent Type(s): Groundwater discharge	Field Measurements:	Upstream	Outfall	Downstream
Permit Flow, MGD:	Flow, MGD			
DEP Sample Collection: ☐ Yes ☒ No	pH, S.U.			
DEP Collector #:	Conductivity, µmhos/cm			
Sample Date / Time:/	Dissolved Oxygen, mg/L			
Sample Location:	Total Residual Chlorine, mg/L			
	Temperature, °C			
Outfall Observations: OK			□ No	ot Observed
Upstream Observations: Overgrown with vegetation			□ No	ot Observed
Downstream Observations: Overgrown with vegetation	on		□ No	ot Observed
Outfall #: 015 Stream: Ohio River		:		·
Effluent Type(s): Groundwater seepage	Field Measurements:	Upstream	Outfall	Downstream
Permit Flow, MGD:	Flow, MGD			
DEP Sample Collection: ☐ Yes ☒ No	pH, S.U.			
DEP Collector #:	Conductivity, µmhos/cm			
Sample Date / Time:/	Dissolved Oxygen, mg/L			
Sample Location:	Total Residual Chlorine, mg/L			
	Temperature °C			
Outfall Observations: OK	/		□No	ot Observed
Upstream Observations: Overgrown with vegetation			⊠ No	ot Observed
Downstream Observations: Overgrown with vegetation	on		⊠ No	ot Observed
Outfall #: Stream:				
Effluent Type(s):	Field Measurements:	Upstream	Outfall	Downstream
Permit Flow, MGD:	Flow, MGD			
DEP Sample Collection: Yes No	pH, S.U.			
DEP Collector #:	Conductivity, µmhos/cm			
Sample Date / Time:/	Dissolved Oxygen, mg/L	·		
Sample Location:	Total Residual Chlorine, mg/L			
	Temperature °C			
Outfall Observations:			□No	ot Observed
Upstream Observations:			□No	ot Observed
Downstream Observations:			□No	ot Observed

Page **7** of **13** 

Date: 7/10/19



#### INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Industrial Stormwater Module	(NPD	ES Per	mit Pai	rt C III.A.)
No Exposure Certification: Date issued:   N/A  Renewal submitted on time:	☐ Yes	□No	□ N/0	A/N ⊠ C
Applicable SIC Code(s): 3339	PAG-03	3 Apper	ndices: I	B □ N/A
Facilities, Materials & Activities exposed to stormwater that could be or are pollutant sources:  Manufacturing & processing materials, activities & equipment (e.g., cleaning, maintenance)  Material handling station(s) (e.g., loading, unloading, and dispensing bulk materials)  Material storage (stockpiles) and equipment storage area(s)  Fuel storage area(s) / filling stations (e.g., coal piles, tanks for petroleum products)  Waste handling and storage (e.g., dumpsters, empty drums, used oil)  Description(s):		,	□ N/	A/N D C
same impervious surfaces on-site new bulk chemicals or solid wastes new site alterations prevent off-site flow onto site	☐ Yes ☐ Yes ☐ Yes	⊠ No □ No □ No	<ul><li>□ N/0</li><li>□ N/0</li></ul>	O N/A O N/A O N/A O N/A
Authorized non-stormwater discharges occur:	ater)	∐ No	∐ N/C	D □ N/A
Stormwater Treatment: ☐ Oil/Water separator ☐ Wetlands ☐ Chemical addition ☐ Other: Various BMPs-Structural & Non-Structural				□ N/A
Discharge to HQ/EV waters (individual permit req'd): ABACT BMPs: ☐ Treatment BMPs ☐ Pollution Prevention ☐ Land Disposal ☐ Stormwate Type(s) used:			⊠ N/C	) □ N/A
Also complete pages A, B, C, D, L, O&P-BMP If needed, complete pages: N-PPC, Q-Specific BMPs, R&S-Photos	YES	NO	N/A	Unable to Determine
	YES	NO	N/A	
If needed, complete pages: N-PPC, Q-Specific BMPs, R&S-Photos				Determine
If needed, complete pages: N-PPC, Q-Specific BMPs, R&S-Photos  protected from exposure to precipitation or runoff  DEP notified no later than 30 days [general permit] / 45 days [individual permit]				Determine
If needed, complete pages: N-PPC, Q-Specific BMPs, R&S-Photos  protected from exposure to precipitation or runoff  DEP notified no later than 30 days [general permit] / 45 days [individual permit]  prior to changes in facility or activity that effect volume or pollutant concentration				Determine
If needed, complete pages: N-PPC, Q-Specific BMPs, R&S-Photos  protected from exposure to precipitation or runoff  DEP notified no later than 30 days [general permit] / 45 days [individual permit] prior to changes in facility or activity that effect volume or pollutant concentration  Structures or devices installed to collect representative samples, if required				Determine
If needed, complete pages: N-PPC, Q-Specific BMPs, R&S-Photos  protected from exposure to precipitation or runoff  DEP notified no later than 30 days [general permit] / 45 days [individual permit] prior to changes in facility or activity that effect volume or pollutant concentration  Structures or devices installed to collect representative samples, if required  Stormwater monitoring & reporting are per the permit requirements				Determine
If needed, complete pages: N-PPC, Q-Specific BMPs, R&S-Photos  protected from exposure to precipitation or runoff  DEP notified no later than 30 days [general permit] / 45 days [individual permit] prior to changes in facility or activity that effect volume or pollutant concentration  Structures or devices installed to collect representative samples, if required  Stormwater monitoring & reporting are per the permit requirements  Record of sample results contains required info [11 items] & retained for 3 years				Determine
If needed, complete pages: N-PPC, Q-Specific BMPs, R&S-Photos  protected from exposure to precipitation or runoff  DEP notified no later than 30 days [general permit] / 45 days [individual permit]     prior to changes in facility or activity that effect volume or pollutant concentration  Structures or devices installed to collect representative samples, if required  Stormwater monitoring & reporting are per the permit requirements  Record of sample results contains required info [11 items] & retained for 3 years  Effluent limits and benchmark values met				Determine
If needed, complete pages: N-PPC, Q-Specific BMPs, R&S-Photos  protected from exposure to precipitation or runoff  DEP notified no later than 30 days [general permit] / 45 days [individual permit]     prior to changes in facility or activity that effect volume or pollutant concentration  Structures or devices installed to collect representative samples, if required  Stormwater monitoring & reporting are per the permit requirements  Record of sample results contains required info [11 items] & retained for 3 years  Effluent limits and benchmark values met  Semi-annual inspections conducted  Date of latest inspection: April 12, 2019				Determine
If needed, complete pages: N-PPC, Q-Specific BMPs, R&S-Photos  protected from exposure to precipitation or runoff  DEP notified no later than 30 days [general permit] / 45 days [individual permit]     prior to changes in facility or activity that effect volume or pollutant concentration  Structures or devices installed to collect representative samples, if required  Stormwater monitoring & reporting are per the permit requirements  Record of sample results contains required info [11 items] & retained for 3 years  Effluent limits and benchmark values met  Semi-annual inspections conducted  Date of latest inspection: April 12, 2019  Annual inspection during a stormwater discharge  Date of latest inspection: April 12, 2019				Determine
If needed, complete pages: N-PPC, Q-Specific BMPs, R&S-Photos  protected from exposure to precipitation or runoff  DEP notified no later than 30 days [general permit] / 45 days [individual permit]     prior to changes in facility or activity that effect volume or pollutant concentration  Structures or devices installed to collect representative samples, if required  Stormwater monitoring & reporting are per the permit requirements  Record of sample results contains required info [11 items] & retained for 3 years  Effluent limits and benchmark values met  Semi-annual inspections conducted Date of latest inspection: April 12, 2019  Annual inspection during a stormwater discharge Date of latest inspection: April 12, 2019  Inspection & monitoring reports available on-site				Determine
If needed, complete pages: N-PPC, Q-Specific BMPs, R&S-Photos  protected from exposure to precipitation or runoff  DEP notified no later than 30 days [general permit] / 45 days [individual permit]     prior to changes in facility or activity that effect volume or pollutant concentration  Structures or devices installed to collect representative samples, if required  Stormwater monitoring & reporting are per the permit requirements  Record of sample results contains required info [11 items] & retained for 3 years  Effluent limits and benchmark values met  Semi-annual inspections conducted Date of latest inspection: April 12, 2019  Annual inspection during a stormwater discharge Date of latest inspection: April 12, 2019  Inspection & monitoring reports available on-site  Complete Annual Reports submitted to DEP by May 1st				Determine
If needed, complete pages: N-PPC, Q-Specific BMPs, R&S-Photos  protected from exposure to precipitation or runoff  DEP notified no later than 30 days [general permit] / 45 days [individual permit]     prior to changes in facility or activity that effect volume or pollutant concentration  Structures or devices installed to collect representative samples, if required  Stormwater monitoring & reporting are per the permit requirements  Record of sample results contains required info [11 items] & retained for 3 years  Effluent limits and benchmark values met  Semi-annual inspections conducted Date of latest inspection: April 12, 2019  Annual inspection during a stormwater discharge Date of latest inspection: April 12, 2019  Inspection & monitoring reports available on-site  Complete Annual Reports submitted to DEP by May 1st  Collected screenings, slurries, sludges & other solids properly handled & disposed of				Determine
protected from exposure to precipitation or runoff  DEP notified no later than 30 days [general permit] / 45 days [individual permit] prior to changes in facility or activity that effect volume or pollutant concentration  Structures or devices installed to collect representative samples, if required  Stormwater monitoring & reporting are per the permit requirements  Record of sample results contains required info [11 items] & retained for 3 years  Effluent limits and benchmark values met  Semi-annual inspections conducted  Date of latest inspection: April 12, 2019  Annual inspection during a stormwater discharge  Date of latest inspection: April 12, 2019  Inspection & monitoring reports available on-site  Complete Annual Reports submitted to DEP by May 1st  Collected screenings, slurries, sludges & other solids properly handled & disposed of  Unauthorized non-stormwater discharges (includes spills & leaks) prevented				Determine
protected from exposure to precipitation or runoff  DEP notified no later than 30 days [general permit] / 45 days [individual permit] prior to changes in facility or activity that effect volume or pollutant concentration  Structures or devices installed to collect representative samples, if required  Stormwater monitoring & reporting are per the permit requirements  Record of sample results contains required info [11 items] & retained for 3 years  Effluent limits and benchmark values met  Semi-annual inspections conducted Date of latest inspection: April 12, 2019  Annual inspection during a stormwater discharge Date of latest inspection: April 12, 2019  Inspection & monitoring reports available on-site  Complete Annual Reports submitted to DEP by May 1st  Collected screenings, slurries, sludges & other solids properly handled & disposed of  Unauthorized non-stormwater discharges (includes spills & leaks) prevented  Floor drains / secondary containment discharge to treatment				Determine

Page 8 of 13

Date: 7/10/19



### INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Industrial Stormwater Module					
		YES	NO	N/A	Unable to Determine
Control measures (BMPs) properly implemented, operated and maintained [see also Pa	ige N]	$\boxtimes$			
Implemented BMPs effective in preventing runoff contamination		$\boxtimes$			
Employees/contractors trained, no less than annually, on pollution prevention practices, BMPs & emergency response. Date of last training: (Not observed) [see also	Page L]	$\boxtimes$			
PPC plan modified to address problems noted during inspections Date modified: (Not observed)					
Stormwater specific PPC plan requirements:					<b>.</b>
Potential sources of pollutants identified that may affect stormwater discharges					
Preventative measures and BMPs identified & implemented to reduce / eliminate pollutants contacting stormwater from routine activities		$\boxtimes$			
Areas with high potential for soil erosion identified by permittee		$\boxtimes$			
SARA Title III facilities: Plan identifies releases of "Water Priority Chemicals" in previou Plan includes evaluation of activities that may result in stormwater discharge of Priority					
Construction activity stormwater discharges permitted  Post-construction stormwater management plan available; facilities/BMPs maintained	Construction activity stormwater discharges permitted Permit #:  Post-construction stormwater management plan available; facilities/BMPs maintained				
Industrial Stormwater Notes:  *Exceedances are listed on Page 2.  ** SECOND NOTICE: Please see reccommendation on Page 1 regarding new requireme	nts for ser	ni-annu	al insp	ections	
Industrial Stormwater Outfall Evaluation	on				
Number of stormwater outfalls: 16 (Includes IMPs) # of New Added / Identified: (	) # Remov	/ed: 4 (	See cor	nments	below)
Number of regulated stormwater outfalls: 16 # evaluated: 11 during inspection					·
	Outfai	U	pstrea	m [	Downstrea
Outfall #: 021 Stream: Poorhouse Run Exposed sources: Fill stored near drainage ditch; Parking lots Treatment: BMP(s) in use: socks Notes: Socks need adjusted to capture all of runoff					
Outfall #: 006 Stream: Poorhouse Run Exposed sources: Stormwater runoff Treatment: Solids settling BMP(s) in use: RetentionSouth Pond (Culvert to receiving stream) Notes: OverflowOutfall 007; Both outfalls need cleaned out					
Outfall #: 008 Stream: Poorhouse Run Exposed sources: Stormwater runoff Treatment: Solids settling BMP(s) in use: Retention-West Pond Notes: OverflowOutfall 009 No discharge at either  Industrial Stormwater Outfall Notes: Outfalls 114, 020, 813 and IMP 113 have been recommendations.	moved as	nart of	⊠ Amen	dment	2 to permit
PA0002208 dated August 17, 2018.	moveu as	part 0	Amen	ument	∠ to permit

Page 9 of 13 Date: 7/10/19 Permit No.: PA0002208



### INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Industrial Stormwater Outfall Evaluation						
Number of stormwater outfalls: 16 ##	of New Added /	ldentified: 0 # F	Removed: 4			
Number of regulated stormwater outfalls: 16 # evaluated: 11						
	Outfall	Upstream	Downstream			
Outfall #: 010 Stream: Poorhouse Run	$\boxtimes$	. 🛛	$\boxtimes$			
Exposed sources:						
Treatment:						
BMP(s) in use:						
Notes: Outfall 012 is overflow; No dischargeNeeds cleaned out						
Outfall #: 004 Stream: Poorhouse Run						
Exposed sources:		ESI				
Treatment:						
BMP(s) in use:						
Notes: Under Construction						
Outself #1 005 Character Ohio Dhara	F-7					
Outfall #: 005 Stream: Ohio River						
Exposed sources: A spring discharging from hillside; construction activities  Treatment:						
BMP(s) in use:						
Notes: Groundwater discharges from Mall Lot 2; Appeared Clear;						
Outfall #: 015 Stream: Ohio River		. 🗆				
Exposed sources:	•					
Treatment:						
BMP(s) in use: Notes: Groundwater Seep; appeared clear; photos taken of sampling points						
Notes. Groundwater Geep, appeared clear, priotos taken or sampling points						
Outfall #: 013, 014 &16 Stream: Ohio River	$\boxtimes$					
Exposed sources:						
Treatment: BMP(s) in use:						
Notes: 016- No Discharge; 013-Water is held 5-7 days after rain event, before						
discharge; No Discharge						
Outfall 014 is overflow No Discharge						
Outfall #: Stream:						
Exposed sources:						
Treatment:						
BMP(s) in use:						
Notes:	-					
Industrial Stormwater Outfall Notes: Outfall 001, 002, 003, and 011 were not observed.		1				

Page 10 of 13

Date: 7/10/19



### INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Best Management Practices (BMPs)		(	NPDES Pe	rmit Pa	ırt C)	
	Ir	nplem	ented	(	Operati	onal
BMPs applicable to all:	YES	NO	Unable to Determine	YES	NO	Unable to Determine
Pollution Prevention and Exposure Minimization:	<u> </u>					
Grading, berming or curbing used to prevent runoff and to divert run-on away	$\boxtimes$			$\boxtimes$		
from areas that contain polluted stormwater.		Ш			<u></u> .	
<ol><li>Materials, equipment, and activities located so that potential leaks and spills are contained, able to be contained or diverted before discharge.</li></ol>						
3. Spills and leaks cleaned up promptly using dry methods (e.g., absorbents).			$\boxtimes$			$\boxtimes$
Leaky vehicles and equipment stored indoors or,     if stored outdoors, use drip pans and absorbents.						
Spill/overflow protection equipment used.						
Vehicle and/or equipment cleaning operations performed indoors, under cover,			<u> </u>	l –		П
or in bermed areas that prevent runoff & run-on, & also capture any overspray.		Ш				Ц
7. Fluids are drained from equipment and vehicles that will be decommissioned.						
Equipment and vehicles that are unused for extended periods of time, are inspected at least monthly for leaks.						
Dumpster lids closed when not in use.						
Discharges are controlled for dumpsters and roll off boxes that do not have lids						
(e.g., with secondary containment, treatment).						
Dry weather discharges from dumpsters or roll off boxes prevented.						
9. Contamination of stormwater runoff from fueling areas is minimized: fueling areas covered; oil/water separators or oil and grease traps installed in fueling area storm drains; berms used to prevent run-on to and runoff from fueling areas; spill/overflow protection and cleanup equipment used; dry cleanup methods used; collected stormwater runoff treated and/or recycled.						
Employees trained (no less than annually) on pollution prevention practices as contained in the PPC Plan.	$\boxtimes$					
Pollution Prevention and Exposure Minimization Notes: *Items 4, 5, 6, 7, 8 & inspection but general compliance was noted	10 we	re not	directly ob	serve	d durir	ng this
Good Housekeeping		·				
<ol> <li>A routine cleaning and maintenance program implemented for: impervious areas where particulate matter, dust or debris may accumulate; and areas where material loading &amp; unloading, storage, handling &amp; processing occur.</li> </ol>						
Materials stored in appropriate containers.						
Discharge of waste, garbage and floatable debris minimized by keeping exposed areas free of them, or by intercepting them before they are discharged.						
Floor drain connections to storm sewers are eliminated.						
5. Drip pans, drain boards and drying racks are used to direct drips back into a fluid holding tank for reuse. Fluids are drained from all equipment and parts prior to disposal. Used fluids are promptly transferred to the proper container. Drip pans and containers are emptied and cleaned.						
6. Waste materials (oil, solvents, batteries, etc) are labeled & recycling is tracked.						
<ol> <li>Hosing down an area is prohibited where the practice would result in the discharge of pollutants to a municipal or other stormwater collection system that conveys pollutants off-site unless proper treatment is provided.</li> </ol>	⊠			⊠		
Good Housekeeping Notes: Wheel wash area is operational. *Items 1, 2, 5, inspection but general compliance was noted. Item 4 was not applicable at the	& 6 we	ere not e of th	t directly o is inspecti	bserve on.	ed duri	ng this

Page 11 of 13 Date: 7/10/19 Permit No.: PA0002208



### INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Best Management Practices (BMPs)		(۱)	IPDES Peri	mit Par	t C)	
DMDs and list to all	lı	nplem	ented	Operat		ional
BMPs applicable to all:	YES	NO	Unable to Determine	YES	NO	Unable to Determine
Erosion & Sediment Controls:			Dotomino			<u> </u>
Erosion and pollutant discharges minimized by stabilizing exposed soils.	$\boxtimes$			$\boxtimes$		
Flow velocity dissipation devices placed at discharge locations that minimize						
channel and stream bank erosion and scour in the immediate vicinity of outfalls.  2. Earth disturbances are conducted, and any post-construction stormwater						
management BMPs are maintained, in accordance with Ch. 102.	$\boxtimes$			$\boxtimes$		
Written permission obtained from DEP to use polymers or other chemicals to treat stormwater.	П					
Erosion & Sediment Controls Notes: *Item 3 was not applicable at the time of	this ir	spect	ion.	<u> </u>		1
		•				
			-			
Spill Prevention & Response:	1		T			
Organized inventory maintained of materials on-site.  Containers appearable to apply an analysis and the leading and the site of the						
Containers susceptible to spillage or leakage labeled.  2. Material storage and handling procedures implemented:						<u>                                     </u>
secondary containment & barriers between material storage and traffic areas, or	$\boxtimes$	. 🖂	П	$\boxtimes$		
a similar means to prevent the discharge of pollutants from these areas.	×					
3. Employee and contractor training developed on the procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases.	$\boxtimes$			$\boxtimes$		
Training conducted no less than annually and documented.	$\boxtimes$					
4. Spill kits on-site, located near areas where spills may occur						
or where a rapid response can be made.						
5. Appropriate facility personnel notified when a leak, spill, or other release occurs.	$\boxtimes$					
6. Number and amount of hazardous materials & waste eliminated or reduced by	$\boxtimes$			$\boxtimes$		
substituting non or less hazardous materials.  7. Leaks, drips & spills cleaned up without using large amounts of water / cleaners.						
Absorbents used for dry cleanup whenever possible.						
Spill Prevention & Response Notes: *Item 1: Material Inventory was not revie			hio inanosi			
no containers susceptible to spills or leaks that were not labeled.	wea a	aring t	nis inspeci	uon. 1 a	aiso o	bserved
*Item 3: Training documentation was not reviewed during this inspection but	is refe	rence	d in the PF	C Pla	n.	
						ļ
BMP Comments	7.77.00					
Bir Comments						
Pumping is anticipated for removal of accumulated pond sediments.						

Page 12 of 13

Date: 7/10/19



#### INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Best Management Practices (BMPs) (NPDES Permit Part C)							
Facility-specific or Sector-specific BMPs		Implemented			Operational		
		YES	NO	Unable to Determine	YES	NO	Unable to Determine
1.	Install & use dust control/collection systems around materials handling & transfer activities	×			×		
2.	Perform all mixing, pouring, cutting and molding activities in buildings with dust control systems.			×			⊠
3.	Store flux materials in enclosed silos or buildings, or otherwise cover materials susceptible to erosion and wind entrainment.						
4.	Provide for reclamation of/or erosion control on historic waste piles.				$\boxtimes$		
5.							
6.							
7.							
8.							
9.							
10.							
11.							
12.							
Facility or Sector Specific BMPs Notes: Sector- and Site-Specific BMPs are listed on Page 67 of the current NPDES Permit (Ammendment 1). Required BMPs correspond to Appendix B of the General Stormwater Permit (NPDES PAG 03).  *BMP 2: Washout area was observed-Conditions OK. Solids are hauled offsite weekly; area is continuously monitored.							

Page 13 of 13 Date: 7/10/19