pennsylvania DEPARTMENT OF ENVIRONMENTAL PROTECTION

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF CLEAN WATER

INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

NPDES / WQM Permit No.	Mo/Day/Year	Entry Time	Exit Time	Inspection Type	eFACTS Inspection ID
PA0002208	09/02/20	0900	1200	CEI	3076501

Facility Name: Shell Chemical Appalachia Petrochemicals Complex	Permittee Name: Shell Chemical Appalachia LLC
Physical Location Address/Directions: 300 Frankfort Road Monaca PA 15061	
Permittee Address: 300 Frankfort Road Monaca PA 15061	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 (IWTP in construction)

Responsible Official: H. James Sewell	Facility Representative: Jason Schultz
Title: Environmental Manager	Title: Environmental Engineer Waste and Water
Business Phone: 724-709-2411	Business Phone: 724-709-2501
Cell Phone: 281.731.3287	Cell Phone: 814-227-8934
Email: jim.sewell@shell.com	Email: jason.schultz2@shell.com

24-Hour Emergency Contact Person / Phone / Email: Shell Security 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.

☐ continued on page B

Recommendations/Comments:

--Address slippage issue at 376 south ramp and power lines

Person Interviewed:	Date:	Inspector:	Date:
Jason Schultz	9/2/20	Shawn P. Bell	9/2/20
Signature: [Report sent by Email]	Phone No.: 724-709-2442	Signature: Shawn P. Bell	Phone No.: 412-442-4051
Title: Environmental Engineer Waste and Water		Title: Water Quality Specialist	
Email: jason.schultz2@shell.com		Email: shawbell@pa.gov	

This document is official notification that a representative of the Department of Environmental Protection inspected the above facility. The findings of this inspection are shown above and on any attached pages. *Any violations which were noted during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses of the discharge and/or review of Department records.

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, and Shawn P. Bell, Water Quality Specialist, PA DEP.

ADMINISTRATIVE REVIEW:

The facility NPDES Permit has been administratively extended. A renewal application was sent to the Department and received on 09/12/2019.

The permit was last amended for a second time on August 17, 2018. The Part II permit #0417201 was amended on Jan 25, 2019.

The following exceedances were indicated on electronic DMRs submitted for monitoring periods of June 2019 through July 2020:

Parameter	Monitoring Period	Outfall	Reported Value	Permit Limit
Total Suspended Solids (Average Monthly)	APR 2019-JUN 2019	015	<35.5 mg/L	30 mg/L
Total Suspended Solids (Daily Maximum)	APR 2019-JUN 2019	015	180 mg/L	100 mg/L

The exceedances at Outfall 015 were attributed to sampling procedures. Additional samples were taken with improved sampling procedures and were compliant. Corrective actions were indicated in the comment section on the 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 continues to progress, along with the IWTP.

-There will be a phased start up at the site. The IWTP will be on line first. Due to the pandemic, the timeline has been extended approximately a year to 18 months.

-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 improved due to minor pollution incidents that were reported, contained, and cleaned up. None of these reported events made it to an outfall or receiving stream. The company has added cement in this area to prevent spills from going into the soil and on the ground. 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 Near entrance on the left as you enter the site. Had been cleaned out. There was no discharge currently at any of the outfalls.

-Outfalls 013, 014 were not discharging. These outfalls are in the vicinity of the fueling area.

-Outfall 004 Near AC (Accidentally Contaminated SW Pond) discharges to Poorhouse Run. No discharge currently.

-Outfall 001 will be the main process wastewater outfall. It was just built. Not completed nor discharging at this time.

-Outfall 021 vegetation was planted in this area and seems to have improved the control of sediment and runoff in this area.

- 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.

INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Facility Description & Regulated Activities

Industrial Activity: Construction/Pre-Commissioning of petrochemical complex for polyethlyene production
SIC / NAICS Code(s): 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: Vehicle tire wash water is collected and shipped off site. Industrial process remains under construction.

Compliance & Enforcement History ☐ N/A

Schedule in Permit: ☒ Yes ☐ N/A In compliance with schedule: ☐ Yes ☐ No ☒ could not confirm

Violations: Last 12 months or since last inspection: ☒ Yes ☐ No ☐ N/O

Enforcement Actions: Last 12 months or since last CEI: ☒ Yes ☐ No ☐ N/O

Legal Agreement: 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 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 Permit)

Influent/Intake sampling location & observations: Multimedia filter on Interim Stormwater Treatment System ☒ N/O ☐ N/A

Effluent/Discharge sampling location: Outfalls as applicable After all treatment: ☒ Yes ☐ No ☐ N/O ☐ N/A

Instream sampling location(s) & observations: ☐ N/O ☒ N/A

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

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

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 ☒ N/A

On-site Analysis: ☒ pH ☒ DO ☒ TRC ☐ T ☐ NPDES parameters ☐ Process control ☒ N/O ☐ N/A

Meters calibrated: pH: ☐ Yes ☐ No ☒ N/O ☐ N/A DO: ☐ Yes ☐ No ☒ N/O ☐ N/A

pH buffers current: ☐ Yes ☐ No ☒ N/O TRC meter checked against standards: ☐ Yes ☐ No ☒ N/O ☐ N/A

On-site Laboratory: ☒ Registered/Accredited-by-Rule or ☐ Accredited ☐ Yes ☐ No ☐ N/O ☐ N/A

Lab Supervisor (accredited labs): N/O Lab ID: 04-00610 ☐ N/A

Accredited parameters: Multiple ☐ N/A

Contract Laboratory & City: Test America--Pittsburgh PA Lab ID: 02-00416 ☐ N/A

Parameters analyzed: All NPDES Parameters except pH, TRC

Monitoring Notes: Samples are collected by Bechtel and transported to the lab by Quick Courier.

INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Recordkeeping (NPDES Permit Part A / WQM Permit)

Monitoring Records: Retained on-site / Up to date: ☐ Yes ☐ No ☒ N/O

Required info recorded: collector, location, sample date/time, analyst, method/QL, results: ☐ Yes ☐ No ☒ N/O

Data are consistent with data from monitoring system(s) and as reported on the DMR: ☐ Yes ☐ No ☒ N/O

Records reviewed / parameters confirmed on-site:

On-Site Logs: Daily operations log: ☐ Yes ☐ No ☒ N/O Up-to-date: ☐ Yes ☐ No ☒ N/O ☐ N/A

Includes: ☐ Visual observations ☐ Process adjustments ☐ Problems and concerns

Routine maintenance log: ☐ Yes ☐ No ☒ N/O Repair log: ☐ 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:

Reporting (NPDES Permit Part A / WQM Permit)

Monitoring Reports: ☐ DMR On time: ☐ Yes ☐ No ☒ N/O

☒ eDMR Prepared correctly: ☒ Yes ☐ No ☐ N/O

☒ Supplemental Reports & Forms Includes all results: ☒ Yes ☐ No ☐ N/O

Monitoring period reviewed: mon(s)/yr: May 2019/June 2020 Parameters assessed: All

Annual Report: Date received: May 1, 2020 On time: ☒ Yes ☐ No ☐ N/O ☐ N/A

Date reviewed: 09/02/20 Report complete & acceptable: ☒ Yes ☐ No ☐ N/O ☐ N/A

Notifications to DEP: Planned changes/alterations to production/process reported: ☒ Yes ☐ No ☐ N/A

Planned changes/alterations to treatment reported: ☐ Yes ☐ No ☒ N/A

Incident reported: ☒ Yes ☐ No ☐ N/A

Other required notifications: ☐ Yes ☐ No ☒ N/A

Reporting Notes:

Flow Measurement (NPDES Permit Part A / WQM Permit) ☐ N/A

Location(s): Multiple outfalls Effluent measured after all withdrawals: ☐ Yes ☐ No ☐ N/O ☒ N/A

System/Device(s): ☒ Full Pipe ☐ Flume, uniform flow, free of debris/deposits: ☐ Yes ☐ No ☐ N/O

☒ Weir, clean with nappe space: ☒ 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 Calibration Range:

Meter/Recorder Operable: ☐ Yes ☐ No Maintained (meter, clean & clear): ☐ Yes ☐ No ☐ N/O

Issues with measurement / recording: ☐ Yes: ☐ No ☐ N/O

Calibration frequency: ☐ Semi-annual ☐ Annual ☐ Other: Date of last calibration: (N/O)

Flow Measurement Notes: .Flow data for other discharge points is calculated on Annual Stormwater Inspection Report.

INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Chemical Additives (NPDES Permit Parts B & C / WQM Permit) ☐ N/A

Production/process chemical additives used for cleaning, disinfection, maintenance: ☒ Yes ☐ No ☐ N/O ☐ N/A

Name(s), purpose:

Chemical Additives Usage form submitted: ☐ Yes ☐ No ☒ N/O

☐ Chemical Additives Usage form attached

Additive(s) in use approved: ☒ Yes ☐ No ☐ N/O

New chemicals & changes to product name or formulations submitted & approved: ☒ Yes ☐ No ☐ N/O ☐ N/A

Chemical additive usage restricted to maximum rate: ☐ Yes ☐ No ☒ N/O ☐ N/A

Chemical Additives Notes:

Treatment Units/Equipment & Treatment Chemicals (NPDES Permit Part B / WQM Permit) ☐ N/A

As-built drawings on-site: ☐ Yes ☐ No ☒ N/O

Treatment chemicals used: ☐ Yes ☐ No ☒ N/O ☐ N/A

Units/Equipment per permit: ☐ Yes ☐ No ☒ N/O

Treatment chemicals authorized: ☐ Yes ☐ No ☒ N/O

Treatment Unit or Equipment	Total	On-Line	Not Operable	Date Inoperable / Date Expected to Return to Service	Observations/Comments Chemical(s) Used & Purpose
West Pond	1	1	0		
AC Pond	1	1	0		
Diversion Box	1	0	0		
Screens	2	0	0		
Pipe Oil Skimmer	1	0	0		
Oil Sump Pump	1	0	0		66 gpm
Transfer Pumps	2	0	0		1 standby; 1 in service (330 gpm)
Flow Equalization & Oil Removal (FEOR)	2	0	0		88,300 cu ft (22 hrs of dry storage; 12 hrs wet storage)
Oil Skimmers	2	0	0		1 for each FEOR
Recovered Oil Tank	1	0	0		2 days storage
Oil Skimmer Pumps	2	0	0		1 standby; 1 in service (66 gpm)
Reinforce Concret tan to AC pond	1	0	0		
Bioreactors	2	0	0		

Treatment Unit / Equipment Notes:

INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Operations & Maintenance: Treatment Plant / Equipment ☒ N/A

O&M Manuals: Available: ☐ Yes ☐ No ☐ N/O

Staff Schedule: ☒ 24/7 ☐ Weekday hours: _____ to _____ ☐ Weekend/Holiday hours: _____ to _____

Plant check schedule:

Certified Operator: Required: ☐ Yes ☒ No On staff: ☐ Yes ☐ No

Stand-by Power: ☐ Emergency generator ☐ Dual power feed ☐ Other: ☐ N/A

Exercise frequency: Exercised under load: ☐ Yes ☐ No ☐ N/O

Maintenance frequency: System operable: ☐ Yes ☐ No ☐ N/O

Alarm System: ☐ Auto Dialer ☐ SCADA ☐ PLC ☐ Other: ☐ N/A

Test frequency: Alarm triggers: Operable: ☐ Yes ☐ No ☐ N/O

Maintenance: Major repair / replacement since last inspection: ☐ Yes ☐ No ☐ N/O

Repairs: Spare parts inventory available: ☐ Yes ☐ No ☐ N/O

Replacements: Standby units available & ready: ☐ Yes ☐ No ☐ N/O

Treatment Plant/Unit Bypass: Since last inspection: ☐ Yes ☐ No ☐ N/O Reported to DEP: ☐ Yes ☐ No ☐ N/A

Unit(s) bypassed: Cause/reason: Discharge to:

O&M Treatment Plant Notes: Treatment currently consists of stormwater retention only.

Treatment Processes & Process Control ☒ N/A

Treatment Processes: ☐ Biological ☐ Physical ☐ Chemical ☒ Other: (Stormwater monitoring only)

Description:

Solids Management: Annual production: N/A

Discharge: ☐ Continuous ☐ Intermittent ☐ Seasonal Design Flow: MGD

☐ Batch, #/day: duration each: volume each:

Frequency: Hours/day: Days/week:

Parameter / Test / Measurement	Test or Check Frequency	Test Result / Finding	Comments

Process & Control Notes:

INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Effluent / Receiving Water Evaluation

Outfall #: 001 **Stream:** Ohio River

Effluent Type(s):
Permit Flow, MGD:
DEP Sample Collection: ☐ Yes ☒ No
DEP Collector #:
Sample Date / Time: _____ / _____
Sample Location:

Field Measurements:	**Upstream**	**Outfall**	**Downstream**
Flow, MGD			
pH, S.U.			
Conductivity, µmhos/cm			
Dissolved Oxygen, mg/L			
Total Residual Chlorine, mg/L			
Temperature, °C			

Outfall Observations: No Discharge; Construction of IWTP not complete ☐ Not Observed

Upstream Observations: ☐ Not Observed

Downstream Observations: ☐ Not Observed

Outfall #: **Stream:**

Effluent Type(s):
Permit Flow, MGD:
DEP Sample Collection: ☐ Yes ☒ No
DEP Collector #:
Sample Date / Time: _____ / _____
Sample Location:

Field Measurements:	**Upstream**	**Outfall**	**Downstream**
Flow, MGD			
pH, S.U.			
Conductivity, µmhos/cm			
Dissolved Oxygen, mg/L			
Total Residual Chlorine, mg/L			
Temperature °C			

Outfall Observations: OK ☐ Not Observed

Upstream Observations: ☒ Not Observed

Downstream Observations: ☒ Not Observed

Outfall #: **Stream:**

Effluent Type(s):
Permit Flow, MGD:
DEP Sample Collection: ☐ Yes ☐ No
DEP Collector #:
Sample Date / Time: _____ / _____
Sample Location:

Field Measurements:	**Upstream**	**Outfall**	**Downstream**
Flow, MGD			
pH, S.U.			
Conductivity, µmhos/cm			
Dissolved Oxygen, mg/L			
Total Residual Chlorine, mg/L			
Temperature °C			

Outfall Observations: ☐ Not Observed

Upstream Observations: ☐ Not Observed

Downstream Observations: ☐ Not Observed

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INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Aquaculture Module

Facility production criteria / designation: ☐ CAAP ☐ AAPF ☐ Seafood with ELGs ☐ Other:

Production facility: ☐ Hatchery ☐ Fish farm ☐ Other: ☐ Cold water ☐ Warm water

Species produced:

Monthly production, lbs: Total: Max: Maximum feeding month: lbs fed:

Total pounds raised during most recent production year:

Water source: Intake or ambient monitoring required: ☐ Yes ☐ No

Type of facility system (containment, flow-through, recirculating, net pen, other): Design Flow:

Type(s) and description of rearing units (raceway, pond, tank, net, screen, cages, other):

Type of real-time feed monitoring system (cameras, sonar, upweller systems, other): ☐ N/A

Treatment system in use: Design Flow: ☐ N/A

Drug / Chemical Usage: Name(s), Rate(s):

Chlorine Usage: ☐ Disinfection ☐ Other: ☐ N/A

Waste removal schedule: Date waste material last removed:

Waste handling practices:

Aquaculture Notes:

Complete modules: A, B, C, D, G-Effluent Others as applicable: E-Chem, F-O&M, N-PPC, O&P&Q-BMP, R&S-Photos	YES	NO	N/A	Unable to Determine
Influent samples collected immediately upstream of production activities.	☐	☐	☐	☐
Chemical additives identified and approved [complete Page E]	☐	☐	☐	☐
Drugs, chemicals and usage rates in accordance with NOI or as approved	☐	☐	☐	☐
DEP notified regarding the investigation and/or use of animal health drugs that may be discharged	☐	☐	☐	☐
Drug Use Report submitted, complete and correct [annually for GPs; quarterly for Ind. permits]	☐	☐	☐	☐
Complete Annual Reports, inc. BMP review, submitted by December 31 (GPs only)	☐	☐	☐	☐
Monitoring of bypass discharge	☐	☐	☐	☐
Compliance schedule in permit, or BMP Plan implementation schedule on track	☐	☐	☐	☐
Hatchery Management Plan (for TSS & water use minimization)	☐	☐	☐	☐
PPC Plan available on-site Date updated: [complete & include Page L]	☐	☐	☐	☐
BMP plan available on-site Date updated:	☐	☐	☐	☐
Methods for storing and handling chemicals, feed, drugs, and pesticides minimize the potential for pollution to occur	☐	☐	☐	☐
Equipment and facilities are maintained in an operational condition	☐	☐	☐	☐
Recordkeeping of feed amounts, cleaning, spills, inspections, repairs, waste removal & disposal	☐	☐	☐	☐
Discharge of uneaten feed and waste products minimized	☐	☐	☐	☐
Escape of non-native species prevented	☐	☐	☐	☐
Proper handling and disposal of animal fatalities	☐	☐	☐	☐
Proper waste (screenings, sludges) & manure handling, management, disposal and application	☐	☐	☐	☐
Personnel trained on proper O&M and in spill prevention and response	☐	☐	☐	☐
BMPs implemented & maintained [include any other BMPs on Page N]	☐	☐	☐	☐

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DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF CLEAN WATER

INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Cooling Water Module ☒ N/A

Cooling Water Source: ☐ Surface water ☐ Groundwater ☐ Reuse ☐ Public water supply
Intake or ambient monitoring required: ☐ Yes ☐ No
Intake/influent field measurement - parameters & results: ☐ None taken

Cooling Water Intake Structure: # at facility: ☐ N/A
Controls: ☐ None ☐ Bar screen ☐ Traveling screen ☐ Pumps ☐ Fish handling system ☐ Other:

Cooling Water System: ☐ Tower ☐ Pond ☐ Heat exchanger ☐ Other
Circulation: ☐ Once through, dissipation (heat reduction) method: ☐ Closed cycle recirculation ☐ N/A
☐ Reused as process water ☐ Other:

Treatment to control: ☐ Fouling ☐ Corrosion ☐ Scale ☐ Microbiologic ☐ Other condition: ☐ N/A
☐ Chemical addition ☐ Other treatment:
☐ Filtration Type: ☐ Separator ☐ Screen filter ☐ Disc filter ☐ Sand filter

Seasonal Use: Cooling Water: Days per year: Duration: Frequency: ☐ N/A
Treatment: Days per year: Duration: Frequency: ☐ N/A

# of Outfalls:

Wastewaters: Discharges to:	Storm drain	Sanitary sewer	Waterway	Other:	Outfall #
☐ Non-contact cooling water	☐	☐	☐		
☐ Contact cooling water	☐	☐	☐		
☐ Cooling system condensate	☐	☐	☐		
☐ Other heat exchanger:	☐	☐	☐		
☐ Cooling tower blowdown	☐	☐	☐		
☐ Boiler blowdown	☐	☐	☐		
☐ Scrubber water	☐	☐	☐		

NCCW / CCW Description:

Discharge observations: ☐ Not Observed

Cooling Systems Notes:

Also complete pages: A, B, C, D, G Others, as applicable/needed: E-Chem/Treatment, F-O&M, N-PPC, O&P&Q-BMP, R&S-Photos	YES	NO	N/A	Unable to Determine
Cooling water intake structures are operational, operating properly, and maintained	☐	☐	☐	☐
Screenings properly handled and disposed of	☐	☐	☐	☐
Cooling water systems are operational, operating properly, and maintained	☐	☐	☐	☐
Blowdown procedure developed and implemented	☐	☐	☐	☐
Treatment units or equipment operational and maintained [Page E, if needed]	☐	☐	☐	☐
All chemical additives and treatment chemicals identified and approved [Page E, if needed]	☐	☐	☐	☐
Drift controlled, minimized or eliminated	☐	☐	☐	☐
PPC or other plan available Date last updated: [use Page L, if needed]	☐	☐	☐	☐
Plan used since last inspection. Date of incident:	☐	☐	☐	☐
Current staff trained in spill prevention and response Date of last training:	☐	☐	☐	☐
Chemical storage & handling methods minimize potential pollution incidents	☐	☐	☐	☐

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DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF CLEAN WATER

INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Groundwater Cleanup Module ☒ N/A

EC&B Program: ☐ Act 2 Land Recycling ☐ Storage Tanks, facility ID: ☐ HSCA ☐ Other: ☐ N/A

Type of Groundwater Contamination: ☐ Gasoline ☐ Other petroleum products ☐ Chlorinated organics ☐ Other:

Wells: # Pumping rate(s):

Influent Sampling: Location: Prior to treatment: ☐ Yes ☐ No ☐ N/O ☐ N/A

Treatment System: ☐ Pump & Treat ☐ EQ tank ☐ Filter ☐ Activated carbon ☐ Separators ☐ Other: Media used:

Frequency of Operation: Days/week: Hours/day: Seasonal use:

Criteria / conditions used to determine when the system will be operated and which wells will be operated:

Treatment Additives used: ☐ Chemical ☐ Biological ☐ N/A

Additive name(s):

Location(s) & amounts (lbs or gals) of addition:

Backwash & cleaning wastewater management/disposal, description:

GWCU Notes:

Also complete pages A, B, C, D, G, N If needed, complete Modules: E-Chems/Treatment, O&P&Q-BMPs, R&S-Photos	YES	NO	N/A	Unable to Determine
Records related to permitting, operation, and monitoring retained for the minimum time specified in the NPDES permit	☐	☐	☐	☐
Treatment units and equipment are: [Page E, if needed]				
operational	☐	☐	☐	☐
operating properly	☐	☐	☐	☐
maintained	☐	☐	☐	☐
All chemical additives and treatment chemicals identified & approved [Page E, if needed]	☐	☐	☐	☐
Chemical usage within max rates	☐	☐	☐	☐
Chemicals properly stored, handled and contained	☐	☐	☐	☐
Potential for a spill, leak, or discharge prevented from occurring, especially in areas without secondary containment	☐	☐	☐	☐
Operations and maintenance manuals available	☐	☐	☐	☐
Recommended procedures followed, including replacing consumables.	☐	☐	☐	☐
Preparedness, Prevention, and Contingency (PPC) plan current, valid, available	☐	☐	☐	☐
Updated within the past 12 months Date of last update:	☐	☐	☐	☐
Staff trained in spill prevention and response Date of last training:	☐	☐	☐	☐
DEP notified of any spills, leaks or discharges since the last DEP inspection	☐	☐	☐	☐
Complete Annual Reports submitted to DEP by January 28 (GPs only)	☐	☐	☐	☐
Waste disposal records available (e.g. media, sludge, backwash, spent material).	☐	☐	☐	☐
Retained for at least five (5) years	☐	☐	☐	☐

INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Industrial Stormwater Module (NPDES Permit Part C III.A.)

No Exposure Certification: Date issued: ☒ N/A Renewal submitted on time: ☐ Yes ☐ No ☐ N/O ☒ N/A

Applicable SIC Code(s): 3339 PAG-03 Appendices: ☐ N/A

Facilities, Materials & Activities exposed to stormwater that could be or are pollutant sources:

- ☐ Manufacturing & processing materials, activities & equipment (e.g., cleaning, maintenance) ☐ N/O ☒ N/A
- ☒ Material handling station(s) (e.g., loading, unloading, and dispensing bulk materials) ☐ N/O ☐ N/A
- ☒ Material storage (stockpiles) and equipment storage area(s) ☐ N/O ☐ N/A
- ☒ Fuel storage area(s) / filling stations (e.g., coal piles, tanks for petroleum products) ☐ N/O ☐ N/A
- ☒ Waste handling and storage (e.g., dumpsters, empty drums, used oil) ☐ N/O ☐ N/A

Description(s): Added some cement in fueling area to minimize impact of minor pollution incidents

Volume or pollutant (nature or quantity of pollutants) changed since last insp: ☐ Yes ☐ No ☒ N/O ☐ N/A
- same impervious surfaces on-site ☐ Yes ☒ No ☐ N/O ☐ N/A
- new bulk chemicals or solid wastes ☐ Yes ☐ No ☒ N/O ☐ N/A
- new site alterations prevent off-site flow onto site ☐ Yes ☐ No ☒ N/O ☐ N/A

Authorized non-stormwater discharges occur: ☒ Yes (Hydrostatic test water) ☐ No ☐ N/O ☐ N/A

Stormwater Treatment: ☐ Oil/Water separator ☐ Wetlands ☐ Chemical addition ☐ N/A
☒ Other: Various BMPs-Structural & Non-Structural

Discharge to HQ/EV waters (individual permit req'd): ☐ Yes ☐ No ☒ N/O ☐ N/A
ABACT BMPs: ☐ Treatment BMPs ☐ Pollution Prevention ☐ Land Disposal ☐ Stormwater Reuse
Type(s) used:

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
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: Sep 24, 2019	☒	☐	☐	☐
Annual inspection during a stormwater discharge Date of latest inspection: Sep 24, 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	☐	☐	☒	☐
Facility clear of excessive dust or air-borne particulates	☒	☐	☐	☐
Potential for leaks, spills & other releases exposed to stormwater minimized	☒	☐	☐	☐
Exposure minimized / prevented in all areas that could be or are pollutant sources	☒	☐	☐	☐

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 Page N]	☒	☐	☐	☐
Implemented BMPs effective in preventing runoff contamination	☒	☐	☐	☐
Employees/contractors trained, no less than annually, on pollution prevention practices, BMPs & emergency response. Date of last training: 08/2019 [see also Page L]	☒	☐	☐	☐
PPC plan modified to address problems noted during inspections Date modified: MAR 2018	☒	☐	☐	☐
Stormwater specific PPC plan requirements:				
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	☒	☐	☐	☐
Areas with high potential for soil erosion identified by permittee	☒	☐	☐	☐
SARA Title III facilities: Plan identifies releases of "Water Priority Chemicals" in previous 3 yrs	☐	☐	☐	☐
Plan includes evaluation of activities that may result in stormwater discharge of Priority Chems	☐	☐	☐	☐
Construction activity stormwater discharges permitted Permit #:	☒	☐	☐	☐
Post-construction stormwater management plan available; facilities/BMPs maintained	☐	☐	☐	☐

Industrial Stormwater Notes:
*Exceedances are listed on Page 2.

Industrial Stormwater Outfall Evaluation

Number of stormwater outfalls: 16 (Includes IMPs) # of New Added / Identified: 0 # Removed: 4 (See comments below)

Number of regulated stormwater outfalls: 16 # evaluated: 11 during inspection

	Outfall	Upstream	Downstrea
Outfall #: 021 **Stream:** Poorhouse Run Exposed sources: Fill stored near drainage ditch; Parking lots Treatment: BMP(s) in use: Vegetation and socks Notes: Improved since last inspection with increased vegetation that appears to be doing a better job at capturing runoff/solids.	☒	☒	☒
Outfall #: 006 **Stream:** Poorhouse Run Exposed sources: Stormwater runoff Treatment: Solids settling BMP(s) in use: Retention--South Pond (Culvert to receiving stream) Notes: Overflow--Outfall 007; Both outfalls had been cleaned out since last visit	☒	☒	☒
Outfall #: 008 **Stream:** Poorhouse Run Exposed sources: Stormwater runoff Treatment: Solids settling BMP(s) in use: Retention-West Pond Notes: Overflow--Outfall 009 No discharge at either; Not observed	☐	☐	☐

Industrial Stormwater Outfall Notes: Outfalls 114, 020, 813 and IMP 113 have been removed as part of Amendment 2 to permit PA0002208 dated August 17, 2018.

INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Industrial Stormwater Outfall Evaluation

Number of stormwater outfalls: 16 # of New Added / Identified: 0 # Removed: 4

Number of regulated stormwater outfalls: 16 # evaluated: 11

	Outfall	Upstream	Downstream
Outfall #: 010 **Stream:** Poorhouse Run Exposed sources: Treatment: BMP(s) in use: Notes: Outfall 012 is overflow; Not observed	☐	☐	☐
Outfall #: 004 **Stream:** Poorhouse Run Exposed sources: Treatment: BMP(s) in use: Notes: observed pond & outfall; no discharge	☐	☐	☐
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; not observed	☐	☐	☐
Outfall #: 015 **Stream:** Ohio River Exposed sources: Treatment: BMP(s) in use: Notes: Groundwater Seep; not observed	☐	☐	☐
Outfall #: 013, 014 &16 **Stream:** Ohio River Exposed sources: Treatment: BMP(s) in use: Notes: 016- Not observed; 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 002, 003, and 011 were also not observed.

pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF CLEAN WATER

INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Preparedness, Prevention, and Contingency Plan (PPC)

Plan(s) in use: ☐ PPC ☐ Spill Prevention Control & Countermeasure (SPCC) ☐ Release Prevention ☐ Other:

Significant facility or operational changes that affects discharge potential since last inspection: ☐ Yes ☐ No ☐ N/O ☐ N/A

Description of changes:

Plan used during incident since last inspection: ☐ Yes, date of use: ☐ No ☐ N/O

Description of incident:

	YES	NO	N/A	Unable to Determine
Current PPC plan available on-site Date of last review/update:	☐	☐	☐	☐
Reviewed annually	☐	☐	☐	☐
Plan Contains:				
1. current facility staff list with contact information	☐	☐	☐	☐
2. current DEP phone & emergency numbers	☐	☐	☐	☐
3. site layout drawings locating potential pollutant materials / activities	☐	☐	☐	☐
4. actions to be taken in response to spills or other pollution incidents	☐	☐	☐	☐
5. security measures prevent entry that could result in unintentional pollutant discharge	☐	☐	☐	☐
6. training plan for employees and contractors, at least annually	☐	☐	☐	☐
7. incident reporting procedure	☐	☐	☐	☐
8. procedure to notify DEP and affected entities	☐	☐	☐	☐
9. contact information for upstream and downstream users	☐	☐	☐	☐
10. contractors/companies that would respond to an accident / incident (responsible for cleanup, containment, disposal)	☐	☐	☐	☐
Plan Implementation:				
Inspections & monitoring conducted. Records / incident reports available on-site	☐	☐	☐	☐
Site layout drawings reflect current conditions / activities	☐	☐	☐	☐
Control measures (containment, access) and response items used and maintained	☐	☐	☐	☐
Spills & leaks: identified substances, cause, remediation, action to prevent occurrences	☐	☐	☐	☐
Current staff trained on pollution prevention & emergency response measures Date of last training:	☐	☐	☐	☐
DEP notified of spills or pollution incidents	☐	☐	☐	☐
Failures of plan identified by permittee (since last inspection):	☐	☐	☐	☐
Plan Update: Date of last update:			☐ N/A	
To correct failures identified during plan use	☐	☐	☐	☐
To address significant facility or operational changes with pollution potential	☐	☐	☐	☐
To address needed changes in the emergency response procedure	☐	☐	☐	☐
With current list of staff, emergency contacts and equipment	☐	☐	☐	☐

PPC Plan Notes:

INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Best Management Practices (BMPs) (NPDES Permit Part C)

BMPs applicable to all:	Implemented			Operational		
	YES	NO	Unable to Determine	YES	NO	Unable to Determine
Pollution Prevention and Exposure Minimization:						
1. Grading, berming or curbing used to prevent runoff and to divert run-on away from areas that contain polluted stormwater.	☒	☐	☐	☒	☐	☐
2. Materials, equipment, and activities located so that potential leaks and spills are contained, able to be contained or diverted before discharge.	☒	☐	☐	☒	☐	☐
3. Spills and leaks cleaned up promptly using dry methods (e.g., absorbents).	☐	☐	☒	☐	☐	☒
4. Leaky vehicles and equipment stored indoors or, if stored outdoors, use drip pans and absorbents.	☐	☐	☐	☐	☐	☐
5. Spill/overflow protection equipment used.	☐	☐	☐	☐	☐	☐
6. Vehicle and/or equipment cleaning operations performed indoors, under cover, or in bermed areas that prevent runoff & run-on, & also capture any overspray.	☐	☐	☐	☐	☐	☐
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.	☐	☐	☐	☐	☐	☐
8. 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.	☒	☐	☐	☒	☐	☐
10. Employees trained (no less than annually) on pollution prevention practices as contained in the PPC Plan.	☒	☐	☐	☐	☐	☐

Pollution Prevention and Exposure Minimization Notes: *Items 4, 5, 6, 7, 8 & 10 were not directly observed during this inspection but general compliance was noted

Good Housekeeping						
1. A routine cleaning and maintenance program implemented for: impervious areas where particulate matter, dust or debris may accumulate; and areas where material loading & unloading, storage, handling & processing occur.	☐ ☐	☐ ☐	☐ ☐	☐ ☐	☐ ☐	☐ ☐
2. Materials stored in appropriate containers.	☐	☐	☐	☐	☐	☐
3. Discharge of waste, garbage and floatable debris minimized by keeping exposed areas free of them, or by intercepting them before they are discharged.	☒	☐	☐	☒	☐	☐
4. 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.	☐	☐	☐	☐	☐	☐
7. 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.	☒	☐	☐	☒	☐	☐

Good Housekeeping Notes: Wheel wash area is operational. *Items 1, 2, 5, & 6 were not directly observed during this inspection but general compliance was noted. Item 4 was not applicable at the time of this inspection.

INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Best Management Practices (BMPs) (NPDES Permit Part C)

BMPs applicable to all:	Implemented			Operational		
	YES	NO	Unable to Determine	YES	NO	Unable to Determine
Erosion & Sediment Controls:						
1. Erosion and pollutant discharges minimized by stabilizing exposed soils.	☒	☐	☐	☒	☐	☐
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.	☒	☐	☐	☒	☐	☐
3. Written permission obtained from DEP to use polymers or other chemicals to treat stormwater.	☐	☐	☐	☐	☐	☐
Erosion & Sediment Controls Notes: *Item 3 was not applicable at the time of this inspection.						
Spill Prevention & Response:						
1. Organized inventory maintained of materials on-site.	☐	☐	☐	☐	☐	☐
Containers susceptible to spillage or leakage labeled.	☐	☐	☐	☐	☐	☐
2. Material storage and handling procedures implemented:						
secondary containment & barriers between material storage and traffic areas, or	☒	☐	☐	☒	☐	☐
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.	☒	☐	☐	☒	☐	☐
Training conducted no less than annually and documented.	☒	☐	☐	☐	☐	☐
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.	☒	☐	☐	☐	☐	☒
6. Number and amount of hazardous materials & waste eliminated or reduced by 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 reviewed during this inspection. I also observed no containers susceptible to spills or leaks that were not labeled.						

BMP Comments

Pumping is anticipated for removal of accumulated pond sediments.

INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Best Management Practices (BMPs) (NPDES Permit Part C)

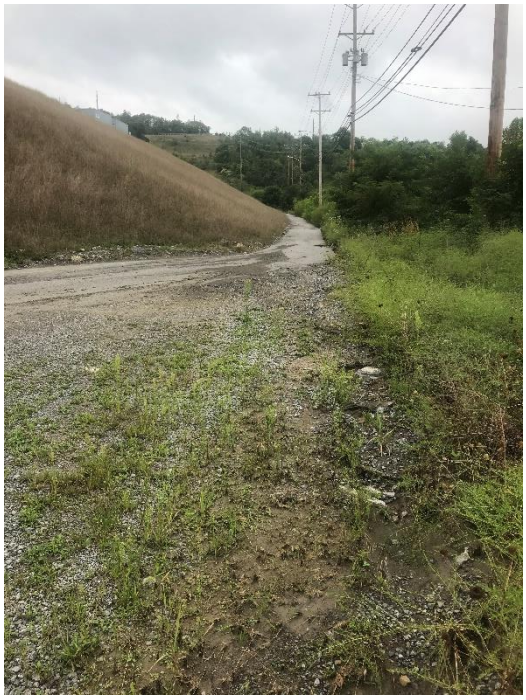
Facility-specific or Sector-specific BMPs	Implemented			Operational		
	YES	NO	Unable to Determine	YES	NO	Unable to Determine
1. Install & use dust control/collection systems around materials handling & transfer activities	☒	☐	☐	☒	☐	☐
2. Perform all mixing, pouring, cutting and molding activities in buildings 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.	☒	☐	☐	☒	☐	☐
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).

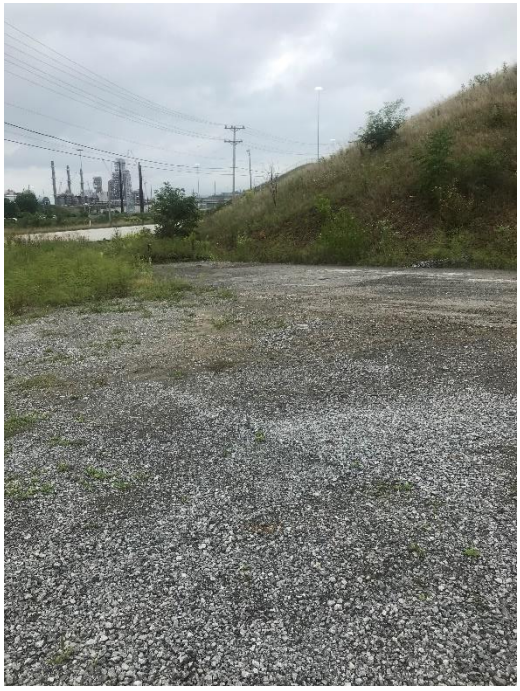
*BMP 2: Washout area was observed-Conditions OK. Solids are hauled offsite weekly; area is continuously monitored.

INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

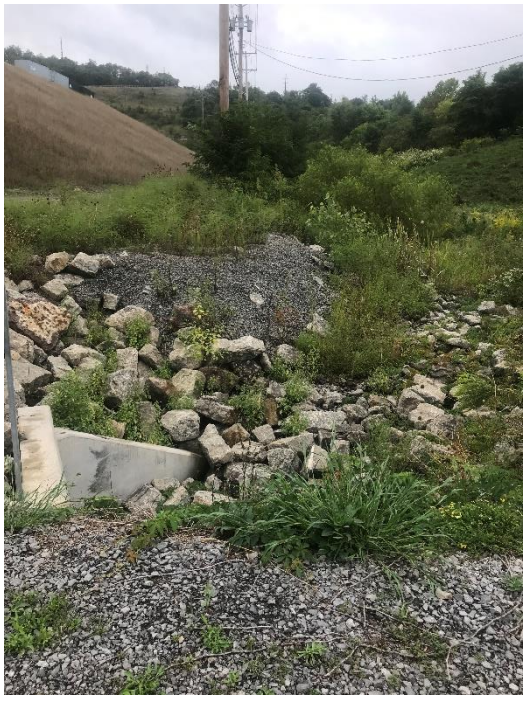
Photographs



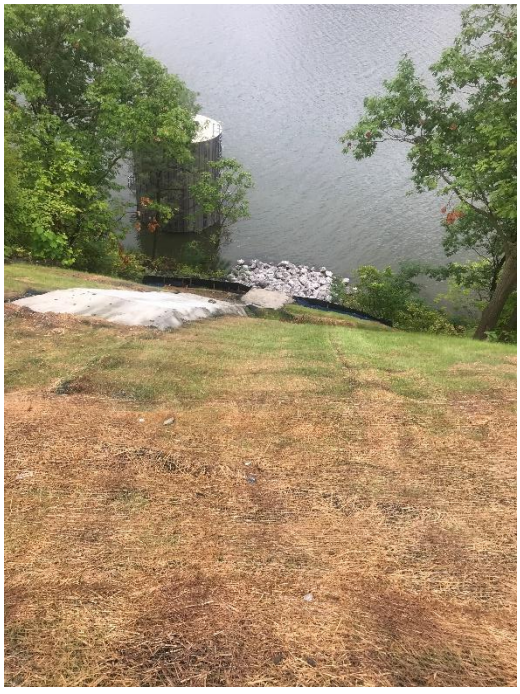
Improved vegetation vicinity Outfall 021; view uphill from outfall



View downhill of vicinity Outfall 021



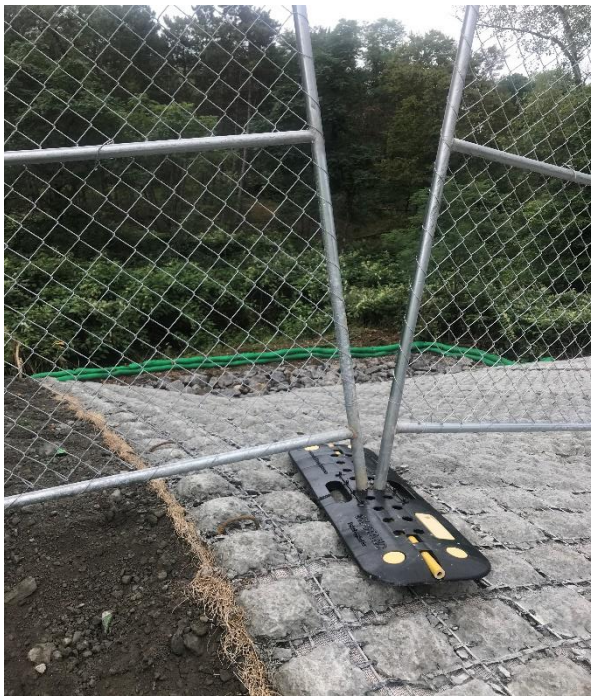
Rip rap and vegetation Outfall 021



Outfall 001

INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Photographs



Outfall 004