

### INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

NPDES / WQM Permit No. M	lo/Day/Year	Entry Time	Exit Time	Inspection Type	eFACTS Inspection ID	
PA0002208	06/03/21	0900	1250	CEI	3200971	
Facility Name: Shell Chemical Appalachia Petroche	emicals Complex		Permittee Na	ame: Shell Chemical Appala	chia LLC	
Physical Location Address/Directions	s: 300 Frankfort R	Road Monac	a PA 15061			
Permittee Address: 300 Frankfort Ro	5061	Permit Expiration Date: 6/30/20 Renewal Due Date: 1/2/20				
Municipality: County: Potter Township Beaver				Type(s) of IW Discharge(s) Groundwater/Stormwater	•	
Responsible Official: Kimberley Kaal			Facility Repr	resentative: Jason Schultz		
Title: Environmental Manager			Title: Enviro	nmental Engineer Waste and	d Water	
Business Phone: 724-709-2467			Business Ph	none: 724-709-2501		
Cell Phone: 724-814-4502			Cell Phone:	814-227-8934		
Email: kimberley.kaal@shell.com			Email: jason	.schultz2@shell.com		
24-Hour Emergency Contact Person	/ Phone / Email:	Shell Secur	ity 412-728-0	0126		
VIOLATIONS*: ⊠ Yes	☐ None Ider	ntified Durin	g 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						
Person Interviewed: Jason Schultz	Date: 6/3/21	1	Inspector: Shawn P. B	Sell	Date: 6/3/21	
Signature:	Phone				Phone No.:	
[Report sent by Email]		09-2442		Shawn P. Bell	412-442-4051	
Title: Environmental Engineer Waste	and Water			Quality Specialist	-	
Email: jason.schultz2@shell.com			Email: shaw	bell@pa.gov		
This document is official notification that a representative of the Department of Environmental Protection inspected the				tal Protection inspected the above	e facility. The findings of this	

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; Kimberley Kaal, Environmental Manager. Kevin Halloran, PA DEP, Assistant Regional Director, John Murphy, PA DEP, Water Quality Specialist Supervisor, 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:

<u>Parameter</u>	Monitoring Period	<u>Outfall</u>	Reported <u>Value</u>	Permit Limit
pH (Maximum)	JUL 2020-SEP 2020	015	9.16 S.U.	9.0 S.U.
Total Suspended Solids (Instantaneous Maximum)	MAR 2021	108	220 mg/L	60 mg/L
Total Suspended Solids (Average Monthly)	MAR 2021	108	175 mg/L	30 mg/L
Iron, Dissolved (Instantaneous Maximum)	MAR 2021	108	11 mg/L	7 mg/L

The exceedance of pH at Outfall 015 was attributed to sampling procedures and possible instrument issue. The exceedances of TSS & Iron, Dissolved was attributed to improper cleaning procedure of hydrotest line prior to discharge. Crew was retrained on procedure to avoid future issues. 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 work site continues to progress. The WWTP is complete and operational. Shell possesses the WWTP except the caustic waste tank. During the site inspection, there was a seal leaking in one of the Water intake clarifiers that was being addressed. It was recommended to put NIST thermometers in the sampling refrigerators.
- -Discussed reporting of potential pollution incidents that are not properly contained or discharge to waterways.
- -Separate PPC plan is used for construction. An updated PPC plan was submitted to the Department DEC 2020. Recommend putting closest town that is downstream and adding PA DEP SWRO number (412)442-4000.
- -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 These outfalls are in the vicinity of the fueling area. The pond had some areas needing repaired.
- -Outfall 001 was completed. Not visible. Post appropriate signage at outfall and waterway.
- -<u>Outfall 021</u> vegetation was planted in this area and seems to have improved the control of sediment and runoff on one side of the road in the area. Significant erosion noted near the Columbia Gas area needs addressed. Flow needs properly diverted to constructed drainage area from road in the area. Current structure does not capture stormwater flow. Noted in internal facility E&S inspections.
- -Outfall 016 had a very brown discharge. The final catch basin vault was not sealed. Noted in internal facility E&S inspections. There should be better access to outfall 016.

It appears some of the stormwater flows downstream of this area and pond near the docks. Should be investigated.

Request a follow up inspection be scheduled of Outfalls 016, 021, and fueling area no later than August 15, 2021.

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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: Passivity being conducted and phased start  Changes in treatment and/or to facility since last insp: WWTP operational; See notes page 2. □ 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. The Natural Gas pipeline(lines pressurized; not bruning). Shell possession of WWTP except caustic waste tank. Site 80% complete.					
Compliance & Enforcement History					
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					
Monitoring (NPDES Permit Part A / WQM Permit)					
Influent/Intake sampling location & observations: Multimedia filter on Interim Stormwater Treatment System					
Sample Collection:          \[             \]         \[					
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/A					
On-site Analysis:         □ PH         □ DO         □ TRC         □ T         □ NPDES parameters         □ Process control         □ N/O         □ N/O         □ N/A           Meters calibrated:         □ PH:         □ Yes         □ NO         □ N/O         □ N/A         □ N/O         □ N/O         □ N/A           pH buffers current:         □ Yes         □ NO         □ N/O         □ N/A         □ N/O         □ 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       ☐ N/A         Accredited parameters:       Multiple       ☐ N/A					
Contract Laboratory & City: Test AmericaPittsburgh 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. Facility will add NIST thermometers at sampler refrigerators.					

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#### INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Recordkeeping (N	PDES 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: Confirmed with OnBase submittals & eDf	MR; JUL 2020-MAY 2021
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 NO 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 (N	PDES Permit Part A / WQM Permit)
Monitoring Reports: DMR On time	: ☐ Yes ☐ No ☒ N/O
	: ⊠ Yes □ No □ N/O
	: ⊠ Yes □ No □ N/O
Monitoring period reviewed: mon(s)/yr: Jul 2020/May 2021 Parameters assessed: A	
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
Reporting Notes: Plant is in the process of a phased start up.	
Flow Measurement (NPDES Perm	it Part A / WQM Permit)
<u>Location(s)</u> : 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
	Yes No NO
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:	bration Range:
Meter/Recorder Operable: ☐ Yes ☐ No Maintained (meter, clean & clear)	: ⊠ Yes □ No □ N/O
Issues with measurement / recording:	: No NO
<u>Calibration frequency</u> : ☐ Semi-annual ☐ <u>Annual</u> ☐ Other: Date of last calibration:	(N/O)
Flow Measurement Notes: .Flow data for other discharge points is calculated on Annual Storm	water Inspection Report.

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Chemical Additives (NPDES Permit Parts B & C / WQM Permit) \[ \] N//								
Production/process chemical add	itives usec	for cleanin	g, disinfecti	on, maintenance:	⊠ Yes □ No □ N/O □ N/A			
Name(s), purpose:								
☐ Chemical Additives Usage for New chemicals & char	anges to pi	ed roduct name	e or formula	itives Usage form sub Additive(s) in use apputions submitted & apputerestricted to maximul	proved:  Yes No No N/O proved: Yes No 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:	es 🗌 No	⊠ N/O			als used: ☐ Yes ☐ No ☒ N/O ☐ N/A			
Units/Equipment per permit:	′es □ No	⊠ N/O	Tr		ıthorized: ☐ 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	1	0					
Screens	2	1	0					
Pipe Oil Skimmer	1	1	0					
Oil Sump Pump	1	1	0		66 gpm			
Transfer Pumps	2	2	0		1 standby; 1 in service (330 gpm)			
Flow Equalization & Oil Removal (FEOR)	2	2	0		88,300 cu ft (22 hrs of dry storage; 12 hrs wet storage)			
Oil Skimmers	2	2	0		1 for each FEOR			
Recovered Oil Tank	1	2	0		2 days storage			
Oil Skimmer Pumps	2	2	0		1 standby; 1 in service (66 gpm)			
Reinforce Concret tan to AC pond	1	1	0					
Bioreactors	2	2	0					
Caustic Waste Tank	1	0	0		Not signed over to Shell			
Treatment Unit / Equipment Notes	5:	1	1					

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### INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Operations & Maintenance: Treatment Plant / Equipment									
O&M Manuals: Available: ☐ Yes ☐ No ☒ N/O									
Staff Schedule: 🛛 24/7	☐ Weekday hou	rs: to	end/Holiday hours: to						
Plant check schedule:									
Certified Operator: Requi	ired: 🗌 Yes 🖾 N	lo	On staff:   Yes	No					
Stand-by Power: Eme	ergency generator	□ Dual power feed □ Oth	er:	□ N/A					
Exercise frequency:			Exercised under load:   Yes	No 🛛 N/O					
Maintenance frequency	:		System operable: ☐ Yes ☐	No ⊠ N/O					
Alarm System: Auto D	Dialer 🛛 SCADA	☐ PLC ☐ Other:		□ N/A					
Test frequency:	Alarm triggers:		Operable: ☐ Yes ☐	No ⊠ N/O					
Maintenance:		Major repair / replacer	ment since last inspection: $\square$ Yes $\square$	No ⊠ N/O					
Repairs:		Spare	parts inventory available:  Yes	No ⊠ N/O					
Replacements: Standby units available & ready:  Yes No									
<u>Treatment Plant/Unit Bypass</u> : Since last inspection: ☐ Yes ☒ No ☐ N/O Reported to DEP: ☐ Yes ☐ No ☒ N/									
Unit(s) bypassed:	Cause/reason:	Discharge to:		_					
O&M Treatment Plant No	tes: Treatment cur	rently consists of phased test w	vater.						
	Treatme	nt Processes & Process	s Control	□ N/A					
Treatment Processes:	Biological 🛛 Pl	hysical 🛛 Chemical 🔲 Oth	ner:						
Description:	_	. – –							
Solids Management: Ann	nual production: TE	BD		-					
Discharge: Continuou			Design	n Flow: MGD					
☐ Batch, #/day:	duration each:	volume each:							
Frequency: Hours/day:	Days/wee	ek:							
Parameter / Test / Measurement	Test or Check Frequency	Test Result / Finding	Comments						
	. roqueriey	100t Robatty I maining	- Commonte						
Process & Control Notes:	rocess & Control Notes:								

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#### INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Effluent / Receiving Water Evaluation								
Outfall #: 001 Stream: Ohio River								
Effluent Type(s):	Field Measurements:	Upstream	Outfall	Downstream				
Permit Flow, MGD:	Flow, MGD							
<b>DEP Sample Collection</b> : ☐ 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: Not accessible			⊠N	ot Observed				
Upstream Observations: Appeared normal			□N	ot Observed				
Downstream Observations: Appeared normal			□N	ot Observed				
Outfall #: Stream:								
Effluent Type(s):	Field Measurements:	Upstream	Outfall	Downstream				
Permit Flow, MGD:	Flow, MGD							
<b>DEP Sample Collection</b> : ☐ 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			□N	ot Observed				
Upstream Observations:			⊠N	ot Observed				
Downstream Observations:			⊠N	ot Observed				
Outfall #: Stream:								
Effluent Type(s):	Field Measurements:	Upstream	Outfall	Downstream				
Permit Flow, MGD:	Flow, MGD							
<b>DEP Sample Collection</b> : ☐ 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:			□N	ot Observed				
Upstream Observations:			□N	ot Observed				
Downstream Observations:			□N	ot Observed				

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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	s fed:							
Total pounds raised during most recent production year:								
Water source: Intake or ambient mon	itoring r	equired	l: 🗌 Ye	s 🗌 No				
Type of facility system (containment, flow-through, recirculating, net pen, other):		De	sign Flo	ow:				
Type(s) and description of rearing units (raceway, pond, tank, net, screen, cages, other):								
				□ NI/A				
Type of real-time feed monitoring system (cameras, sonar, upweller systems, other):				□ N/A				
Treatment system in use:	Docid	n Flow:		□ N/A				
rreathent system in use.	Desigi	i i iow.						
Drug / Chemical Usage: Name(s), Rate(s):								
Chlorine Usage:  Disinfection  Other:				□ N/A				
Waste removal schedule:  Date waste material las	t remov	ed.						
Waste handling practices:	. 1011101	ou.						
Aquaculture Notes:								
Complete modules: A, B, C, D, G-Effluent	\/F0		21/4	Unable to				
Others as applicable: E-Chem, F-O&M, N-PPC, O&P&Q-BMP, R&S-Photos	YES	NO	N/A	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		<u> </u>						
Recordkeeping of feed amounts, cleaning, spills, inspections, repairs, waste removal & disposal		<u> </u>						
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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### 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:						⊠ No	ne taken
Cooling Water Intake Structure: # at facility: 1							□ N/A
Controls: ☐ None ☒ Bar screen ☐ Traveling screen	☐ Pumps	☐ Fish ha	indling system	Other:			
Cooling Water System: ☐ Tower ☐ Pond ☐ Heat e	xchanger [	Other					
Circulation:   Once through, dissipation (heat reduct	ion) method	: 🗆	Closed cycle	recirculation			☐ N/A
☐ Reused as process water ☐ Other:							
Treatment to control: ☐ Fouling ☐ Corrosion ☐ Sca	ale 🗌 Micro	obiologic [	Other condi	tion:			☐ N/A
☐ Chemical addition ☐ Other treatment:		_					
☐ Filtration Type: ☐ Separator ☐ Screen filter		er 🗌 San	d filter				
Seasonal Use: Cooling Water: Days		Durat		requency:			□ N/A
Treatment: Days	per year:	Durati	ion: F	requency:			□ N/A
# of Outfalls: 1; Outfall #201	T 0:	10 %				1	
Wastewaters: Discharges to:	Storm drain	Sanitary sewer	Waterway	Othe	er:		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 0	Observed
Cooling Systems Notes:							
Cooling Systems Notes.							
Also complete pages: A,							Harabila ta
Others, as applicable/needed: E-Chem/Treatment, F-O		O&P&Q-BI	MP, R&S-Pho	tos YES	NO	N/A	Unable to Determine
Cooling water intake structures are operational, operation	g properly, a	and maintair	ned	$\boxtimes$			
Screenings properly handled and disposed of				$\boxtimes$			
Cooling water systems are operational, operating proper	ly, and main	tained					$\boxtimes$
Blowdown procedure developed and implemented							$\boxtimes$
Treatment units or equipment operational and maintained [Page E, if needed]						$\boxtimes$	
All chemical additives and treatment chemicals identified and approved [Page E, if needed]							$\boxtimes$
Drift controlled, minimized or eliminated							$\boxtimes$
PPC or other plan available Date last updated: C	CT 2020	[use Pa	ge L, if needed]				
Plan used since last inspection.	Da	te of incider	nt: 05/14/2021				
Current staff trained in spill prevention and response	Date o	f last trainin	g: 05/29/2021				
Chemical storage & handling methods minimize potentia	l pollution in	cidents					

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Groundwater Cleanup Module								
EC&B Program: Act 2 Land Recycling Storage Tanks, facility ID: HSCA Other:								
Type of Groundwater Contamination:  Gasoline Other petroleum products Chlorinated organics Other:								
Wells: # Pumping rate(s):								
Influent Sampling: Location: Prior to treatment:  Yes No NO								
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.	erated:							
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 V/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				Ш				
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:		Ш						
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								

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### INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Industrial Stormwater Module				ES Per	mit Par	t C III.A.)
No Exposure Certification: Date issued:	⊠ N/A	Renewal submitted on time	: 🗌 Yes	☐ No	□ N/0	D ⊠ N/A
Applicable SIC Code(s): 3339		PAC	6-03 App	endices	s:	⊠ N/A
Facilities, Materials & Activities exposed to  Manufacturing & processing materials, Material handling station(s) (e.g., loadi Material storage (stockpiles) and equip Fuel storage area(s) / filling stations (e.g., waste handling and storage (e.g., dun Description(s): Added some cement in fueling same impervious surfaces on-site new bulk chemicals or solid wastes	activities & equipment ng, unloading, and dispoment storage area(s) e.g., coal piles, tanks for apsters, empty drums, ung area to minimize imp	(e.g., cleaning, maintenance) pensing bulk materials)  petroleum products) used oil) pact of minor pollution incidents	☐ Yes	⊠ No	N/0   N/0	0   N/A 0   N/A 0   N/A 0   N/A 0   N/A 0   N/A 0   N/A
new site alterations prevent off-site fle	ow onto site		☐ Yes	☐ No	⊠ N/0	D N/A
Authorized non-stormwater discharges occu	ır:	Yes (Hydrostatic test v	vater)	☐ No	□ N/C	D □ N/A
Stormwater Treatment: ☐ Oil/Water separa ☐ Other: Various BMPs-Structural & Nor		hemical addition				□ N/A
Discharge to HQ/EV waters (individual permit req'd):						
Also complete pa	ages A, B, C, D, L, O&P :: N-PPC, Q-Specific BN		YES	NO	N/A	Unable to Determine
	: N-PPC, Q-Specific BN		YES	NO	<b>N/A</b>	
If needed, complete pages	n or runoff  permit] / 45 days [indivi	MPs, R&S-Photos				Determine
If needed, complete pages protected from exposure to precipitation DEP notified no later than 30 days [general	N-PPC, Q-Specific BN n or runoff permit] / 45 days [indivieffect volume or polluta	MPs, R&S-Photos idual permit] ant concentration				Determine
If needed, complete pages protected from exposure to precipitation  DEP notified no later than 30 days [general prior to changes in facility or activity that	n or runoff  permit] / 45 days [indivieffect volume or pollutative samples, if	MPs, R&S-Photos idual permit] ant concentration required				Determine
protected from exposure to precipitation  DEP notified no later than 30 days [general prior to changes in facility or activity that  Structures or devices installed to collect rep	n or runoff  permit] / 45 days [indivieffect volume or pollutaresentative samples, if the permit requirements	MPs, R&S-Photos  idual permit] ant concentration required				Determine
protected from exposure to precipitation  DEP notified no later than 30 days [general prior to changes in facility or activity that  Structures or devices installed to collect rep  Stormwater monitoring & reporting are per to	n or runoff  permit] / 45 days [indivieffect volume or pollutaresentative samples, if the permit requirements	MPs, R&S-Photos  idual permit] ant concentration required				Determine
protected from exposure to precipitation  DEP notified no later than 30 days [general prior to changes in facility or activity that  Structures or devices installed to collect rep  Stormwater monitoring & reporting are per the Record of sample results contains required	n or runoff  permit] / 45 days [indivieffect volume or pollutaresentative samples, if the permit requirements info [11 items] & retained	MPs, R&S-Photos  idual permit] ant concentration required				Determine
protected from exposure to precipitation  DEP notified no later than 30 days [general prior to changes in facility or activity that  Structures or devices installed to collect rep  Stormwater monitoring & reporting are per t  Record of sample results contains required  Effluent limits and benchmark values met	PPC, Q-Specific BN or runoff  permit] / 45 days [indivive ffect volume or pollutates resentative samples, if the permit requirements info [11 items] & retained Date of I	MPs, R&S-Photos  idual permit] ant concentration required ed for 3 years				Determine
protected from exposure to precipitation  DEP notified no later than 30 days [general prior to changes in facility or activity that  Structures or devices installed to collect rep  Stormwater monitoring & reporting are per t  Record of sample results contains required  Effluent limits and benchmark values met  Semi-annual inspections conducted	PPC, Q-Specific BN or runoff  permit] / 45 days [indivi- effect volume or pollutaresentative samples, if he permit requirements info [11 items] & retained  Date of Indiage  Date of Indiage	idual permit] ant concentration required ed for 3 years				Determine
protected from exposure to precipitation  DEP notified no later than 30 days [general prior to changes in facility or activity that  Structures or devices installed to collect rep  Stormwater monitoring & reporting are per t  Record of sample results contains required  Effluent limits and benchmark values met  Semi-annual inspections conducted  Annual inspection during a stormwater disci	PPC, Q-Specific BN or runoff  permit] / 45 days [indivi- effect volume or polluta- resentative samples, if he permit requirements info [11 items] & retained  Date of Interge Date or n-site	idual permit] ant concentration required ed for 3 years				Determine
protected from exposure to precipitation  DEP notified no later than 30 days [general prior to changes in facility or activity that  Structures or devices installed to collect rep Stormwater monitoring & reporting are per t Record of sample results contains required Effluent limits and benchmark values met Semi-annual inspections conducted Annual inspection during a stormwater disc Inspection & monitoring reports available or	P by May 1st	idual permit] ant concentration required ed for 3 years latest inspection: Dec 15, 2020 f latest inspection: Jul 22, 2020				Determine
protected from exposure to precipitation  DEP notified no later than 30 days [general prior to changes in facility or activity that  Structures or devices installed to collect rep Stormwater monitoring & reporting are per t Record of sample results contains required  Effluent limits and benchmark values met Semi-annual inspections conducted  Annual inspection during a stormwater disci	Poly May 1st  her solids properly hand	idual permit] ant concentration required ed for 3 years latest inspection: Dec 15, 2020 f latest inspection: Jul 22, 2020 dled & disposed of				Determine
protected from exposure to precipitation  DEP notified no later than 30 days [general prior to changes in facility or activity that  Structures or devices installed to collect rep Stormwater monitoring & reporting are per t Record of sample results contains required  Effluent limits and benchmark values met Semi-annual inspections conducted  Annual inspection during a stormwater disci Inspection & monitoring reports available or Complete Annual Reports submitted to DEF Collected screenings, slurries, sludges & ot	Position of the permit of the permit of the permit of the permit requirements of the permit requiremen	idual permit] ant concentration required ed for 3 years latest inspection: Dec 15, 2020 f latest inspection: Jul 22, 2020 dled & disposed of				Determine
protected from exposure to precipitation  DEP notified no later than 30 days [general prior to changes in facility or activity that  Structures or devices installed to collect rep Stormwater monitoring & reporting are per t Record of sample results contains required  Effluent limits and benchmark values met Semi-annual inspections conducted  Annual inspection during a stormwater disci Inspection & monitoring reports available or Complete Annual Reports submitted to DEF Collected screenings, slurries, sludges & ot Unauthorized non-stormwater discharges (i	Pare of Interest Date of Date	idual permit] ant concentration required ed for 3 years latest inspection: Dec 15, 2020 f latest inspection: Jul 22, 2020 dled & disposed of				Determine
protected from exposure to precipitation  DEP notified no later than 30 days [general prior to changes in facility or activity that  Structures or devices installed to collect rep  Stormwater monitoring & reporting are per t  Record of sample results contains required  Effluent limits and benchmark values met  Semi-annual inspections conducted  Annual inspection during a stormwater disci  Inspection & monitoring reports available or  Complete Annual Reports submitted to DEF  Collected screenings, slurries, sludges & ot  Unauthorized non-stormwater discharges (i  Floor drains / secondary containment discharges)	P by May 1st her solids properly hand not read the particulates  particulates	idual permit] ant concentration required ed for 3 years latest inspection: Dec 15, 2020 f latest inspection: Jul 22, 2020 dled & disposed of prevented				Determine

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### 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 1]	age 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: 05/2021 [see also	$\boxtimes$						
PPC plan modified to address problems noted during inspections  Date modified: 10/	28/2020	$\boxtimes$					
Stormwater specific PPC plan requirements:							
Potential sources of pollutants identified that may affect stormwater discharges		$\boxtimes$					
Preventative measures and BMPs identified & implemented to reduce / eliminate polluta contacting stormwater from routine activities	nts	$\boxtimes$					
Areas with high potential for soil erosion identified by permittee		$\boxtimes$					
SARA Title III facilities: Plan identifies releases of "Water Priority Chemicals" in previous Plan includes evaluation of activities that may result in stormwater discharge of Priority	,						
Construction activity stormwater discharges permitted Permit		$\boxtimes$					
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: 9 during inspection							
	Outfal	I L	Jpstrea	ım	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. Needs more improvement see pp. 1 & 2							
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 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: OverflowOutfall 009 Neither observed							
Industrial Stormwater Outfall Notes: Outfalls 114, 020, 813 and IMP 113 have been re PA0002208 dated August 17, 2018.	emoved as	s part o	f Amer	ndment	2 to permit		

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#### 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: 9							
	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; not observed							
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							
Outfall #: 013, 014 &16 Stream: Ohio River Exposed sources: Treatment: BMP(s) in use: Notes: 016- brown discharge, vault not sealed see page 1&2; 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.							

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### 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: Facility is in a phased start up								
Plan used during incident since last inspection:	/2021	□ No [	□ N/O					
Description of incident: overflow while filling gasoline tank approx. 5 gallon to soil; reported, contained, and cleaned up								
	YES	NO	N/A	Unable to Determine				
Current PPC plan available on-site Date of last review/update: 10/28/2020	$\boxtimes$							
Reviewed annually	$\boxtimes$							
Plan Contains:								
current facility staff list with contact information	$\boxtimes$							
2. current DEP phone & emergency numbers	$\boxtimes$							
3. site layout drawings locating potential pollutant materials / activities								
4. actions to be taken in response to spills or other pollution incidents	$\boxtimes$							
5. security measures prevent entry that could result in unintentional pollutant discharge	$\boxtimes$							
6. training plan for employees and contractors, at least annually	$\boxtimes$							
7. incident reporting procedure	$\boxtimes$							
8. procedure to notify DEP and affected entities	$\boxtimes$							
9. contact information for upstream and downstream users	$\boxtimes$							
<ol> <li>contractors/companies that would respond to an accident / incident (responsible for cleanup, containment, disposal)</li> </ol>	$\boxtimes$							
Plan Implementation:								
Inspections & monitoring conducted. Records / incident reports available on-site	$\boxtimes$							
Site layout drawings reflect current conditions / activities	$\boxtimes$							
Control measures (containment, access) and response items used and maintained	$\boxtimes$							
Spills & leaks: identified substances, cause, remediation, action to prevent occurrences	$\boxtimes$							
Current staff trained on pollution prevention & emergency response measures  Date of last training: May 2021	$\boxtimes$							
DEP notified of spills or pollution incidents	$\boxtimes$							
Failures of plan identified by permittee (since last inspection):		$\boxtimes$						
Plan Update: Date of last update: OCT 2020	•		_ N	I/A				
To correct failures identified during plan use		$\boxtimes$						
To address significant facility or operational changes with pollution potential	$\boxtimes$							
To address needed changes in the emergency response procedure		$\boxtimes$						
With current list of staff, emergency contacts and equipment	$\boxtimes$							
PPC Plan Notes: See notes pages 1 & 2.								

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### INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Best Management Practices (BMPs) (NPDES Permit Part C)						
	Implemented		Implemented Operational		onal	
BMPs applicable to all:		NO	Unable to Determine	YES	NO	Unable to Determine
Pollution Prevention and Exposure Minimization:						
Grading, berming or curbing used to prevent runoff and to divert run-on away	$\boxtimes$	П		$\boxtimes$		
from areas that contain polluted stormwater.		Ц	Ш			
<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,		П				
if stored outdoors, use drip pans and absorbents.		Ш	_			
Spill/overflow protection equipment used.						
<ol><li>Vehicle and/or equipment cleaning operations performed indoors, under cover, or in bermed areas that prevent runoff &amp; run-on, &amp; also capture any overspray.</li></ol>						
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).	l _				]	]
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.						
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	ı	1		ı		
A routine cleaning and maintenance program implemented for:    The continue con						
impervious areas where particulate matter, dust or debris may accumulate; and areas where material loading & unloading, storage, handling & processing occur.						
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, & 6 were not directly observed during this inspection but general compliance was noted. Item 4 was not applicable at the time of this inspection.						

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#### INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

YES	NO 🗵	Unable to Determine	YES	NO  IIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII	Unable to Determine
YES	NO 🗵	Unable to Determine			
			$\boxtimes$		
		П			
on pa	~~~ 1				
	ges 1	& 2. *Iter	n 3 wa	s not	
					Ц
			$\square$	П	
$\boxtimes$					
$\boxtimes$			$\boxtimes$		
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$\boxtimes$			$\boxtimes$		
	П	П	$\square$	П	П
$\boxtimes$			$\boxtimes$		

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### INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

	Best Management Practices (BMPs)	(NPDES Permit Part C)					
F	silitu amasitis au Castau amasitis DMDs	Implemented Operational					
Facility-specific or Sector-specific BMPs		YES	NO	Unable to Determine	YES	NO	Unable to Determine
1.	Install & use dust control/collection systems around materials handling & transfer activities	$\boxtimes$			$\boxtimes$		
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. See comments regarding outfalls 016 & 021 on pages 1 & 2.							

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### INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

#### **Photographs**



Flow not making it to drainage swale at Outfall 021



Erosion upstream of Columbia gas site vicinity Outfall 021



Erosion downstream Columbia gas site vicinity Outfall 021



North Pond

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#### INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

### **Photographs**



Road to Outfall 016



Trench to Outfall 016



Grating to Outfall 016



Outfall 016

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