



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Beaver Falls District Office | 715 15th Street | Beaver Falls, PA 15010
www.dep.pa.gov

October 15, 2018

NOTICE OF VIOLATION

Shell Chemical Appalachia LLC
300 Frankfort Road
Monaca PA 15061

Re: Industrial Waste—Shell Chemical Appalachia Petrochemicals Complex
Potter Township, Beaver County

Dear Mr. Sewell,

The Department finds, as a result of a review of your Discharge Monitoring Reports for the months of March 2017-March 2018, your effluent has exceeded the effluent limitations established in your NPDES Permit, No. PA0002208. Please be advised that failure to comply with the terms and conditions of your permit constitutes a violation of Sections 201 and 202 of The Clean Streams Law.

The violations are listed in the attached inspection report. This Notice of Violation is neither an order nor any other final action of the Department. It neither imposes nor waives any enforcement action available to the Department under any of its statutes. If the Department determines that an enforcement action is appropriate, you will be notified of the action.

If you have any questions, please call me at 724-847-5279.

Sincerely,

A handwritten signature in blue ink that reads "Amanda Schmidt".

Amanda Schmidt
Water Quality Specialist

cc: DEP Southwest Regional Office



INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

NPDES / WQM Permit No.	Mo/Day/Year	Entry Time	Exit Time	Inspection Type	eFACTS Inspection ID
PA0002208	5/17/18	10:00	12:40	CEI	2731359
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: Potter Township		County: Beaver		Type(s) of IW Discharge(s): Groundwater/Stormwater (IWTP in construction)	
Responsible Official: H. James Sewell Title: Environmental Manager			Facility Representative: Frank Jeanson Title: Senior Environmental Advisor		
Business Phone: 724-709-2411 Cell Phone: 281.731.3287 Email: jim.sewell@shell.com			Business Phone: 724-709-2442 Cell Phone: 281-772-0030 Email: frank.jeanson@shell.com		
24-Hour Emergency Contact Person / Phone / Email: Shell Security 412-728-0126					
VIOLATIONS*: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> None Identified During Inspection <input type="checkbox"/> Pending Results of Sample Analysis					
--Violations of effluent limits in Part A of the NPDES Permit [25 Pa. Code 92a.44]					
<input type="checkbox"/> continued on page B					
Recommendations/Comments: --Ensure that the new Stormwater Annual Report template is used for the next submission due 5/1/19. (See attached document and Part C.III.B of the NPDES permit). Please also note that Semi-Annual Inspections are now required, as indicated in Part C.III.D.					
Person Interviewed: Frank Jeanson & others listed on Pg 2		Date: 5/17/18	Inspector: Amanda Schmidt		Date: 10/15/18
Signature: [Report sent by Email]		Phone No.: 724-709-2442	Signature: 		Phone No.: 724-847-5279
Title: Senior Environmental Advisor			Title: Water Quality Specialist		
Email: frank.jeanson@shell.com			Email: amschmidt		
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. Weather conditions were sunny with temperatures in the 50s.

Present on behalf of Shell were Frank Jeanson, Glen Richards (Bechtel), Lance Witters & Brian Sterner (ERM). Present on behalf of the Department were Stacey Greenwald, David Roote & Amanda Schmidt.

ADMINISTRATIVE REVIEW:

The facility has a valid NPDES Permit, which was amended in June 2017. A response to the previous inspection report was received as requested.

The following exceedances were indicated on electronic DMRs submitted for monitoring periods of March 2017 through March 2018:

<u>Parameter</u>	<u>Monitoring Period</u>	<u>Outfall</u>	<u>Reported Value</u>	<u>Permit Limit</u>
Total Suspended Solids (Monthly Average Concentration)	3 rd Quarter 2017	015	35.7 mg/L	30 mg/L
Benzene (Instantaneous Maximum Concentration)	October 2017	108	0.0044 mg/L	0.0025 mg/L

The exceedance at Outfall 015 was attributed to organic matter present in the sampling pool. 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.

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.

-Additional observations are included on attached pages.



INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Facility Description & Regulated Activities	
Industrial Activity: Construction/Pre-Commissioning of petrochemical complex for polyethylene 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: <input checked="" type="checkbox"/> N/A Changes in treatment and/or to facility since last insp: <input checked="" type="checkbox"/> N/A Changes in wastewater quantity or quality since last insp: <input type="checkbox"/> new pollutants <input type="checkbox"/> Increased flow or conc. <input checked="" type="checkbox"/> N/A	
Sanitary discharge to: <input type="checkbox"/> On-site STP, outfall/permit #: <input type="checkbox"/> with IWW <input type="checkbox"/> Onlot <input checked="" type="checkbox"/> Public sewer <input type="checkbox"/> Other: Sewage Compliance Inspection Report attached: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Separate inspection conducted	
Removed substances: <input type="checkbox"/> Treatment sludge <input type="checkbox"/> Backwash solids <input type="checkbox"/> Screenings <input type="checkbox"/> Spent mat'l/media <input type="checkbox"/> Other: Hauling/Disposal to: by: per permit # (Part C I. B.)	
Facility/Activities Notes: (Industrial process remains under construction)	
Compliance & Enforcement History <input type="checkbox"/> N/A	
Schedule in Permit: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> N/A In compliance with schedule: <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> could not confirm Violations: Last 12 months or since last inspection: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/O Enforcement Actions: Last 12 months or since last CEI: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/O Legal Agreement: Consent Order & Agreement, Consent Decree or Order executed: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/O <input type="checkbox"/> N/A Date executed: Obligation(s) due next: Date due: In compliance with legal agreement: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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 <input checked="" type="checkbox"/> N/O <input type="checkbox"/> N/A Effluent/Discharge sampling location: Outfalls as applicable After all treatment: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/O <input type="checkbox"/> N/A Instream sampling location(s) & observations: <input type="checkbox"/> N/O <input checked="" type="checkbox"/> N/A	
Sample Collection: <input checked="" type="checkbox"/> Manually <input type="checkbox"/> Auto sampler, T: , controlled by: <input type="checkbox"/> Flow meter <input type="checkbox"/> Other Type: <input checked="" type="checkbox"/> Grab <input type="checkbox"/> 8-hour comp <input type="checkbox"/> 24-hour comp <input type="checkbox"/> Other Min. aliquot ≥100 ml: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/O Composites: <input type="checkbox"/> Flow proportional <input checked="" type="checkbox"/> Time proportional <input type="checkbox"/> Not proportional Sample location, collection, frequency, measurements representative of the monitored activity: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/O	
Sample Handling & Analysis: Properly preserved during collection, storage and shipping: <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/O Storage temperatures recorded using NIST traceable thermometer: <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/O Analyzed within the required holding time: <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/O Parameters analyzed, test methods, sample frequencies & types in accordance with permit: <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/O	
Monitoring systems: <input type="checkbox"/> SCADA <input type="checkbox"/> PLC <input type="checkbox"/> Continuous meter for Calibrated: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/O <input checked="" type="checkbox"/> N/A	
On-site Analysis: <input checked="" type="checkbox"/> pH <input checked="" type="checkbox"/> DO <input type="checkbox"/> TRC <input type="checkbox"/> T <input type="checkbox"/> NPDES parameters <input type="checkbox"/> Process control <input type="checkbox"/> N/O <input type="checkbox"/> N/A Meters calibrated: pH: <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/O <input type="checkbox"/> N/A DO: <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/O <input type="checkbox"/> N/A pH buffers current: <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/O TRC meter checked against standards: <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/O <input type="checkbox"/> N/A	
On-site Laboratory: <input checked="" type="checkbox"/> Registered/Accredited-by-Rule or <input type="checkbox"/> Accredited <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/O <input type="checkbox"/> N/A Lab Supervisor (accredited labs): N/O Lab ID: 04-00610 <input type="checkbox"/> N/A Accredited parameters: Multiple <input type="checkbox"/> N/A	
Contract Laboratory & City: Test America--Pittsburgh PA Lab ID: 02-00416 <input type="checkbox"/> N/A Parameters analyzed: All NPDES Parameters except pH	
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)
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Monitoring Records: Required info recorded: collector, location, sample date/time, analyst, method/QL, results: <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/O Data are consistent with data from monitoring system(s) and as reported on the DMR: <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/O Records reviewed / parameters confirmed on-site:	Retained on-site / Up to date: <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/O Up-to-date: <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/O <input type="checkbox"/> N/A Includes: <input type="checkbox"/> Visual observations <input type="checkbox"/> Process adjustments <input type="checkbox"/> Problems and concerns Routine maintenance log: <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/O Repair log: <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/O Records, Reports, Logs available: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Retained (3 years): <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/O
Permit(s) at the facility: Permit terms and conditions reviewed by responsible official and/or facility representative:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/O <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/O
Recordkeeping Notes:	

Reporting	(NPDES Permit Part A / WQM Permit)
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Monitoring Reports: <input type="checkbox"/> DMR <input checked="" type="checkbox"/> eDMR <input checked="" type="checkbox"/> Supplemental Reports & Forms Monitoring period reviewed: mon(s)/yr: /	On time: <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/O Prepared correctly: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/O Includes all results: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/O Parameters assessed:
Annual Report: Date received: March 2018 Date reviewed: 10/10/18	On time: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/O <input type="checkbox"/> N/A Report complete & acceptable: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/O <input type="checkbox"/> N/A
Notifications to DEP:	Planned changes/alterations to production/process reported: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Planned changes/alterations to treatment reported: <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A Incident reported: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Other required notifications: <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Reporting Notes: Please see recommendation on Page 1 regarding new requirements for Annual Stormwater Report	

Flow Measurement	(NPDES Permit Part A / WQM Permit)	<input type="checkbox"/> N/A
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Location(s): Multiple outfalls System/Device(s): <input checked="" type="checkbox"/> Full Pipe	Effluent measured after all withdrawals: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/O <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Flume, uniform flow, free of debris/deposits: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/O <input checked="" type="checkbox"/> Weir, clean with nappe space: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/O
Meter: <input type="checkbox"/> Ultrasonic <input type="checkbox"/> Transducer <input type="checkbox"/> Magnetic <input type="checkbox"/> Bubbler <input type="checkbox"/> Float <input checked="" type="checkbox"/> Other: Turbine Inspected: <input type="checkbox"/> Daily <input type="checkbox"/> Weekly <input checked="" type="checkbox"/> Other: When ITS online Location: IMP 114 Recorder: <input type="checkbox"/> Totalizer <input type="checkbox"/> Daily Chart <input type="checkbox"/> 7-Day Chart <input type="checkbox"/> SCADA/Electronic <input type="checkbox"/> Other:	Maximum meter range: N/O MGD Calibration Range:
Capable of recording design flow: <input type="checkbox"/> Yes <input type="checkbox"/> No Meter/Recorder Operable: <input type="checkbox"/> Yes <input type="checkbox"/> No	Maintained (meter, clean & clear): <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/O Issues with measurement / recording: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/O
Calibration frequency: <input type="checkbox"/> Semi-annual <input type="checkbox"/> Annual <input type="checkbox"/> Other: Date of last calibration: (N/O)	
Flow Measurement Notes: Turbine Meter/Totalizer was associated with interim stormwater treatment facility. Flow data for other discharge points is calculated on Annual Stormwater Inspection Report. Conditions at Outfall 005 weir were OK.	



INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Effluent / Receiving Water Evaluation					
Outfall #: 005 Stream: Ohio River					
Effluent Type(s): Groundwater discharge	Field Measurements:	Upstream	Outfall	Downstream	
Permit Flow, MGD:	Flow, MGD				
DEP Sample Collection: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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			<input type="checkbox"/> Not Observed		
Upstream Observations: OK			<input type="checkbox"/> Not Observed		
Downstream Observations: OK			<input type="checkbox"/> Not Observed		
Outfall #: 015 Stream: Ohio River					
Effluent Type(s): Groundwater seepage	Field Measurements:	Upstream	Outfall	Downstream	
Permit Flow, MGD:	Flow, MGD				
DEP Sample Collection: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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			<input type="checkbox"/> Not Observed		
Upstream Observations: OK			<input type="checkbox"/> Not Observed		
Downstream Observations: OK			<input type="checkbox"/> Not Observed		
Outfall #:	Stream:	Field Measurements:	Upstream	Outfall	Downstream
Effluent Type(s):		Flow, MGD			
Permit Flow, MGD:		pH, S.U.			
DEP Sample Collection: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Conductivity, µmhos/cm			
DEP Collector #:		Dissolved Oxygen, mg/L			
Sample Date / Time: ____ / ____		Total Residual Chlorine, mg/L			
Sample Location:		Temperature °C			
Outfall Observations:			<input type="checkbox"/> Not Observed		
Upstream Observations:			<input type="checkbox"/> Not Observed		
Downstream Observations:			<input type="checkbox"/> Not Observed		



INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Industrial Stormwater Module		(NPDES Permit Part C III.A.)			
No Exposure Certification: Date issued: <input checked="" type="checkbox"/> N/A		Renewal submitted on time: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/O <input checked="" type="checkbox"/> N/A			
Applicable SIC Code(s): 3339		PAG-03 Appendices: B <input type="checkbox"/> N/A			
Facilities, Materials & Activities exposed to stormwater that could be or are pollutant sources:					
<input type="checkbox"/> Manufacturing & processing materials, activities & equipment (e.g., cleaning, maintenance)		<input type="checkbox"/> N/O <input checked="" type="checkbox"/> N/A			
<input checked="" type="checkbox"/> Material handling station(s) (e.g., loading, unloading, and dispensing bulk materials)		<input type="checkbox"/> N/O <input type="checkbox"/> N/A			
<input checked="" type="checkbox"/> Material storage (stockpiles) and equipment storage area(s)		<input type="checkbox"/> N/O <input type="checkbox"/> N/A			
<input checked="" type="checkbox"/> Fuel storage area(s) / filling stations (e.g., coal piles, tanks for petroleum products)		<input type="checkbox"/> N/O <input type="checkbox"/> N/A			
<input checked="" type="checkbox"/> Waste handling and storage (e.g., dumpsters, empty drums, used oil)		<input type="checkbox"/> N/O <input type="checkbox"/> N/A			
Description(s):					
Volume or pollutant (nature or quantity of pollutants) changed since last insp:		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/O <input type="checkbox"/> N/A			
same impervious surfaces on-site		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/O <input type="checkbox"/> N/A			
new bulk chemicals or solid wastes		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/O <input type="checkbox"/> N/A			
new site alterations prevent off-site flow onto site		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/O <input type="checkbox"/> N/A			
Authorized non-stormwater discharges occur:		<input checked="" type="checkbox"/> Yes (Hydrostatic test water) <input type="checkbox"/> No <input type="checkbox"/> N/O <input type="checkbox"/> N/A			
Stormwater Treatment: <input type="checkbox"/> Oil/Water separator <input type="checkbox"/> Wetlands <input type="checkbox"/> Chemical addition		<input type="checkbox"/> N/A			
<input checked="" type="checkbox"/> Other: Various BMPs-Structural & Non-Structural					
Discharge to HQ/EV waters (individual permit req'd):		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/O <input type="checkbox"/> N/A			
ABACT BMPs: <input type="checkbox"/> Treatment BMPs <input type="checkbox"/> Pollution Prevention <input type="checkbox"/> Land Disposal <input type="checkbox"/> 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		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Structures or devices installed to collect representative samples, if required		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Stormwater monitoring & reporting are per the permit requirements		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Record of sample results contains required info [11 items] & retained for 3 years		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Effluent limits and benchmark values met		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Semi-annual inspections conducted		Date of latest inspection: January 2018			
Annual inspection during a stormwater discharge		Date of latest inspection: January 2018			
Inspection & monitoring reports available on-site		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Complete Annual Reports submitted to DEP by May 1 st		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Collected screenings, slurries, sludges & other solids properly handled & disposed of		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Unauthorized non-stormwater discharges (includes spills & leaks) prevented		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Floor drains / secondary containment discharge to treatment		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Facility clear of excessive dust or air-borne particulates		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Potential for leaks, spills & other releases exposed to stormwater minimized		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Exposure minimized / prevented in all areas that could be or are pollutant sources		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



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]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Implemented BMPs effective in preventing runoff contamination	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Employees/contractors trained, no less than annually, on pollution prevention practices, BMPs & emergency response. Date of last training: (Not observed) [see also Page L]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PPC plan modified to address problems noted during inspections Date modified: (Not observed)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Stormwater specific PPC plan requirements:				
Potential sources of pollutants identified that may affect stormwater discharges	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Preventative measures and BMPs identified & implemented to reduce / eliminate pollutants contacting stormwater from routine activities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Areas with high potential for soil erosion identified by permittee	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SARA Title III facilities: Plan identifies releases of "Water Priority Chemicals" in previous 3 yrs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plan includes evaluation of activities that may result in stormwater discharge of Priority Chems	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Construction activity stormwater discharges permitted Permit #:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Post-construction stormwater management plan available; facilities/BMPs maintained	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Industrial Stormwater Notes: *Exceedances are listed on Page 2. Benchmark Values include: COD--120 mg/L; TSS--100 mg/L *Please see recommendation on Page 1 regarding new requirements for semi-annual inspections				
Industrial Stormwater Outfall Evaluation				
Number of stormwater outfalls: 16 (Includes IMPs)# of New Added / Identified: 1 (Outfall 012) # Removed: 10 (See comments below) Number of regulated stormwater outfalls: 16 # evaluated: 6 during inspection (Administrative review is ongoing)				
	Outfall	Upstream	Downstream	
Outfall #: 002 Stream: Rag Run Exposed sources: Construction activity for Railyard Treatment: Solids settling BMP(s) in use: East RR Pond-Concrete basin. Final discharge point is tied into Rag Run conveyance Notes: Overflow--Outfall 003 (Not discharging at time of inspection)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
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; Conditions OK	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Outfall #: 008 Stream: Ohio River (during construction)/Poorhouse Run (after construction) Exposed sources: Stormwater runoff Treatment: Solids settling, ITS as needed BMP(s) in use: Retention-West Pond Notes: Steady discharge-Conditions OK	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Industrial Stormwater Outfall Notes: Construction Stormwater Outfalls 017, 018 and 019 and Outfall Overflows 104, 204, 304, 404, 504, 604 and 713 have been removed. Stormwater is also included in discharges for permitted Outfalls 101 & 001. Outfall 013 was also observed--conditions were OK.				



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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Materials, equipment, and activities located so that potential leaks and spills are contained, able to be contained or diverted before discharge.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Spills and leaks cleaned up promptly using dry methods (e.g., absorbents).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Leaky vehicles and equipment stored indoors or, if stored outdoors, use drip pans and absorbents.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Spill/overflow protection equipment used.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Vehicle and/or equipment cleaning operations performed indoors, under cover, or in bermed areas that prevent runoff & run-on, & also capture any overspray.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Employees trained (no less than annually) on pollution prevention practices as contained in the PPC Plan.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Materials stored in appropriate containers.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Discharge of waste, garbage and floatable debris minimized by keeping exposed areas free of them, or by intercepting them before they are discharged.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Floor drain connections to storm sewers are eliminated.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Waste materials (oil, solvents, batteries, etc) are labeled & recycling is tracked.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Good Housekeeping Notes: Wheel wash area is under construction. *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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Earth disturbances are conducted, and any post-construction stormwater management BMPs are maintained, in accordance with Ch. 102.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Written permission obtained from DEP to use polymers or other chemicals to treat stormwater.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Erosion & Sediment Controls Notes: Paving of heavy haul road was completed since last inspection, Issues previously noted in Wall H construction area appear to be resolved. *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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Spill kits on-site, located near areas where spills may occur or where a rapid response can be made.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Appropriate facility personnel notified when a leak, spill, or other release occurs.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Number and amount of hazardous materials & waste eliminated or reduced by substituting non or less hazardous materials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Leaks, drips & spills cleaned up without using large amounts of water / cleaners. Absorbents used for dry cleanup whenever possible.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Spill Prevention & Response Notes: Mobile fueling area has been relocated to Railyard construction area. Barriers were placed appropriately and spill kits were present. No signs of leaks or spills were noted. *Item 1: Material Inventory was not reviewed during this inspection. I also observed no containers susceptible to spills or leaks that were not labeled. *Item 3: Training documentation was not reviewed during this inspection but is referenced in the PPC Plan.						
BMP Comments						
Pumping is anticipated for removal of accumulated pond sediments. Annual stormwater report also included Outfalls 005 and 015.						



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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Perform all mixing, pouring, cutting and molding activities in buildings with dust control systems.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Store flux materials in enclosed silos or buildings, or otherwise cover materials susceptible to erosion and wind entrainment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Provide for reclamation of/or erosion control on historic waste piles.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Facility or Sector Specific BMPs Notes: Sector- and Site-Specific BMPs are listed on Page 67 of the current NPDES Permit (Amendment 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 by Waste Management; area is continuously monitored.

INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Photographs



Photo 1-Main works construction area



Photo 2-Washout pit



Photo 3-Outfall 013/Ohio River (View from North Pond)

INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Photographs



Photo 4-Outfall 002



Photo 5-Outfall 002



Photo 6-Outfall 003

INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Photographs



Photo 7-Improved conditions on Outfall 005 access road and Ground cover/Revegetation of former Horsehead (Closed) landfill



Photo 8-Outfall 015



Photo 9-Ground cover/Revegetation of former Horsehead (Closed) landfill



Photo 10-Outfall 005

INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Photographs



Photo 11-Outfall 006 structure



Photo 12-South Pond



Photo 13-South Pond

INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Photographs



Photo 14-West Pond



Photo 15-Outfall 008