

**CWA COMPLIANCE EVALUATION INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5**

Facility: Highview Custom Fabricating Inc.
3369 Bay Ridge Court
Hobart, Wisconsin 54155

NPDES Permit Number: WIR05IA06

Purpose: To evaluate compliance with applicable stormwater regulations under the National Pollutant Discharge Elimination System (NPDES) permit program and the Clean Water Act (CWA).

Date of Inspection: April 17, 2024

EPA Region 5 Water Enforcement Compliance Assurance Representatives:

- Keith Middleton, Environmental Engineer, middleton.keith@epa.gov, 312-886-6465
- Eric Small, Physical Scientist, small.eric@epa.gov, 312-886-6680

Facility Representatives:

- Beth Wojkiewicz, Safety and Workers Compensation Coordinator, Highview Custom Fabricating Inc., beth@highviewfab.com, 920-869-1900
- Rick Tlachac, General Manager, Highview Custom Fabricating Inc., rick@highviewfab.com, 920-869-1900
- Bob Heroux, Highview Custom Fabricating Inc., bobh@highviewfab.com, 920-869-1900

Report Prepared by: Keith Middleton, Environmental Engineer

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INTRODUCTION

On April 17, 2024, representatives from the U.S. Environmental Protection Agency, Region 5 conducted a Compliance Evaluation Inspection at the Highview Custom Fabricating Inc. facility in Green Bay, Wisconsin (“facility”). The purpose of this inspection was to evaluate this facility’s compliance with the CWA and the facility’s EPA issued National Pollutant Discharge Elimination System (“NPDES”) permit. This inspection consisted of the following: an opening conference, discussions concerning the facility’s Stormwater Pollution Prevention Plan (SWPPP), compliance with this facility’s NPDES permits, facility site walk-through, and a closing conference. Any findings and concerns that EPA identified during the inspection are listed in the section entitled “Areas of Concern” starting on page 11 of this report.

FACILITY BACKGROUND

This facility is owned and operated by Highview Custom Fabricating Inc. (“Highview”). According to facility representatives, this facility is located on a 7-acre parcel of land and has been in this location since approximately 1997. The site includes a 40,000-square foot (SF) metal fabrication/production building (“main production building”), a 10,000 SF building primarily used for shipping finished products (“machine shop”), outside materials storage locations (north of the production building and both north/south of the shipping building) and a parking lot located south of the production building. There is an undeveloped portion of land, located north of the production building material storage location, owned by the facility. In addition, some of the stormwater runoff from the machine shop portion of the facility drains to a stormwater pond, located southeast of the facility. EPA learned during the inspection that this stormwater pond was constructed in approximately 2007.

During the inspection, EPA was told by Highview representatives that this facility produces mining equipment. In addition, Highview’s website indicates the facility also produces marine, logging, pulp/paper, and construction equipment. The production of this equipment takes place in the main production building. There are about 41 employees that work at this facility. Production occurs from approximately 7:00 am to 1:20 am within two shifts, four days a week. The facility’s Standard Industrial Classification (SIC) code is 3441 (Fabricated Structural Metal).

Facility-Identified Stormwater Discharge Points

During the inspection, EPA was informed by Highview representatives that there are three stormwater discharge points located within the facility’s site. Discharge Point 001 is located at the end of a culvert under the parking lot access road southeast of the main production building. A roof drain is a stormwater contributor to this outfall, along with some lawn runoff and parking lot runoff. Discharge Point 002 is a stormwater inlet located south of the main production building in the parking lot. The main stormwater runoff that is tributary to Discharge Point 002 is from the main production building roof and the parking lot. The stormwater flow from Discharge Point 002 then flows east into the same roadside ditch (west of Bay Ridge Court) that Discharge Point 001 flows into. The stormwater from both of these discharge points flows south

within a roadside ditch and combines with runoff from the road and the Bayland Building facility. This combined stormwater flow then flows into a roadside ditch north of Wisconsin State Route 54 and flows to the east.

Discharge Point 003 is located on the southeast corner of the facility. Runoff from the machine shop's roof is routed to this location along with stormwater runoff in and around the machine shop. Discharge Point 003 is located at the end of a ditch just beyond where the roof drain daylights to an open channel. Highview's SWPPP indicates that after Discharge Point 003, the stormwater flows south through a vegetated swale. During the inspection, EPA observed evidence of a vegetated, open channel that appeared to flow into a stormwater detention pond, located east of Al Huss Auto & Truck Photograph 24 in Attachment A). From observations during the inspection and aerial mapping, it appears that this stormwater detention pond will discharge at a certain point into the previously mentioned roadside ditch north of Wisconsin State Route 54. From this point, Highview's SWPPP notes that the stormwater then flows into an intermittent unnamed river/creek. This unnamed river/creek then discharges into Duck Creek. From USGS mapping, EPA confirmed this is likely the flow path of stormwater discharged from the site, once the stormwater reaches the roadside ditch north of Wisconsin State Route 54.

Receiving Waters

As previously mentioned, Discharge Points 001, 002, and 003 discharge to an intermittent unnamed river/creek and then Duck Creek. Duck Creek is shown as a permanent waterbody on the USGS National Map website (<https://apps.nationalmap.gov/viewer>). Duck Creek flows northeast into Lake Michigan, just north of Green Bay, Wisconsin. Neither the intermittent unnamed river/creek and the portion of Duck Creek where the unnamed river/creek flows into Duck Creek is not listed as having any impairments. Further downstream before Duck Creek discharges to Lake Michigan, Duck Creek is impaired for turbidity and nutrients (Nitrogen and/or Phosphorus).

National Pollutant Discharge Elimination System Permit

EPA issued this facility a National Pollutant Discharge Elimination System (NPDES) permit Multi-Sector General Permit for stormwater discharges associated with industrial activity on October 8, 2021. This permit ("Stormwater Permit") expires on February 28, 2026. According to Highview facility representatives, the facility was previously covered under a Wisconsin Pollutant Discharge Elimination System (WPDES) general permit for industrial stormwater discharges, starting in approximately 1997 to 2021. The requirements of the current Stormwater Permit include the following:

- Identifying the onsite stormwater controls used to minimize pollutant discharges (Part 2 of the Stormwater Permit).
- Inspection and Stormwater Monitoring procedures (Parts 3 and 4 of the Stormwater Permit)

- The requirements of a Stormwater Pollution Prevention Plan (Part 6 of the Stormwater Permit).
- The reporting and recordkeeping requirements (Part 7 of the Stormwater Permit).

SITE INSPECTION



Exhibit 1: Highview Custom Fabricating – Hobart, Wisconsin¹

Source: USGS The National Map (2021)

Initial Inspection Discussion

The EPA inspection team, consisting of Mr. Middleton, Mr. Nguyen, and Mr. Small arrived at the facility at approximately 9:00 pm on Wednesday, April 17, 2024. The weather was cloudy with intermittent rain with a temperature of approximately 55° Fahrenheit. After parking in the parking lot south of the facility, the EPA inspectors entered the facility. After waiting briefly in the facility's waiting area, EPA was shown to a nearby conference room. Here, the EPA inspectors met Highview representatives Ms. Wojkiewicz, Mr. Tlachac, and Mr. Heroux. After talking with Ms. Wojkiewicz, Mr. Tlachac, and Mr. Heroux and explaining the purpose of the EPA inspection, Mr. Middleton and Mr. Small presented their EPA inspector credentials to the Highview representatives. Next, EPA discussed the EPA's Confidential Business Information (CBI) provisions, indicated that EPA would requesting documents and taking pictures outside the facility, and proposed a tentative schedule for the inspection.

¹ Notes on Exhibit 1: The red box is the facility's main production building. The blue box is the facility's machine shop The yellow shapes are the facility's outdoor material storage areas. The orange box is the stormwater detention pond. The three brown points represent the facility's stormwater discharge points.

EPA inspectors then began discussing background information of the Highview facility, including the history of the facility and the general operations of the facility. This information is summarized above in the Facility Background section on page 2 of the inspection report. During this conversation, EPA also learned that Ms. Wojkiewicz is the lead stormwater contact with Mr. Tlachac signing both the quarterly observations and annual inspection forms that are submitted to EPA.

EPA inspectors then asked Highview representatives about the three stormwater outfalls that are at this facility (see Facility-Identified Stormwater Outfalls portion of the inspection report on page 2). EPA asked about the stormwater runoff from the material storage area to the undeveloped property to the north; Highview representatives responded that any runoff was sheet flow and the stormwater did not flow to Duck Creek, located to northwest of the site.

EPA then learned from Highview representatives that Foth Infrastructure & Environmental LLC (“Foth”), located in Green Bay, Wisconsin, developed the SWPPP and conducts the required stormwater sampling, the routine stormwater inspections, the quarterly stormwater assessment and the annual inspections. Highview representatives indicated that this is typically done by Sonya Stenli but can also be done by Bob Meller, both with Foth.

SIC Code: During the inspection EPA was able to confirm that the SIC code for this facility was 3441. This SIC code indicates that the facility is in sector AA and subsector AA1 pursuant to Part 8 of the Stormwater Permit.

Benchmark Stormwater Sampling: Due to the facility being in subsector AA1, the facility is required to conduct benchmark sampling for the first full four quarters, and for the four quarters in the facility’s fourth year of permit coverage, while the Stormwater Permit is effective. Pursuant to Table 8.AA-2 in the Stormwater Permit (Part 8), the facility is required to sample for total recoverable aluminum, total recoverable zinc (freshwater - hardness depended), and nitrate plus nitrite - nitrogen. EPA requested raw benchmark sampling data from Highview representatives and on May 3, 2024 Highview submitted that information to EPA. Below are the tabulated sampling results for each Discharge Point in 2022:

Discharge Point 001

Parameter	1 st Q 2022	2 nd Q 2022	3 rd Q 2022	4 th Q 2022	2022 Average Total	Benchmark Thresholds
Aluminum	242 µg/L	166 µg/L	<90.3 µg/L	194 µg/L	173 µg/L	1,100 µg/L
Zinc (freshwater)	388 µg/L	50.1 µg/L	36.80 µg/L	411 µg/L	221 µg/L	52 µg/L
Hardness	68.4 mg/L	4.09 mg/L	-	1.23 mg/L	61.4 mg/L	-
Nitrate plus Nitrite - Nitrogen	0.72 mg/L	0.36 mg/L	0.08 mg/L	0.30 mg/L	0.35 mg/L	0.68 mg/L

Discharge Point 002

Parameter	1 st Q 2022	2 nd Q 2022	3 rd Q 2022	4 th Q 2022	2022 Average Total	Benchmark Thresholds
Aluminum	-	652 µg/L	103 µg/L	-	377 µg/L	1,100 µg/L
Zinc (freshwater)	-	183 µg/L	15.0 µg/L	-	99 µg/L	52 µg/L
Hardness	-	10.80 mg/L	-	-	27 mg/L	-
Nitrate plus Nitrite - Nitrogen	-	0.42 mg/L	0.15 mg/L	-	0.35 mg/L	0.68 mg/L

Discharge Point 003

Parameter	1 st Q 2022	2 nd Q 2022	3 rd Q 2022	4 th Q 2022	2022 Average Total	Benchmark Thresholds
Aluminum	-	230 µg/L	124 µg/L	236 µg/L	197 µg/L	1,100 µg/L
Zinc (freshwater)	-	107 µg/L	97.0 µg/L	440 µg/L	215 µg/L	37 µg/L
Hardness	-	3.70 mg/L	-	3.5 mg/L	9.0 mg/L	-
Nitrate plus Nitrite - Nitrogen	-	0.25 mg/L	0.52 mg/L	0.27 mg/L	0.35 mg/L	0.68 mg/L

Given that the 2022 benchmark sampling annual average for zinc was greater than the threshold for Discharge Point 001 and a single sample exceed the threshold for zinc by four times for Discharge Point 002 and 003 (note, the single sample comparison is done given that there were not samples every quarter) Highview was required by the Stormwater Permit to continue to sample for zinc quarterly until results indicate that the annual average is no longer exceeded (Part 4.2.2.3.a.i) and follow the Additional Implementation Measures (AIM) in Part 5.2 of the Stormwater Permit.

From information obtained after the inspection, EPA learned that the facility continued to sample for all the benchmark parameters in 2023 at Discharge Points 001, 002, and 003, with Discharge Point 001 being sampled a total of 8 times, Discharge Point 002 sampled a total 5 times and Discharge Point 003 was sampled a total of 7 times. Highview representatives told EPA during the inspection that 2023 was a dry year and it was hard to obtain samples. This sampling was done in part due to the facility's AIM Level 1 status. These results are summarized below:

Discharge Point	Parameter	2023 Average Total	Highest Concentration	Benchmark Thresholds
001	Aluminum	148 µg/L	252 µg/L	1,100 µg/L
	Zinc (freshwater)	126 µg/L	428 µg/L	37 µg/L
	Hardness	21.9 mg/L	-	-
	Nitrate plus Nitrite - Nitrogen	0.81 mg/L	0.81 mg/L	0.68 mg/L
002	Aluminum	1,058 µg/L	2,650 µg/L	1,100 µg/L
	Zinc (freshwater)	80.1 µg/L	109 µg/L	52 µg/L
	Hardness	29.7 mg/L	-	-
	Nitrate plus Nitrite - Nitrogen	1.0 mg/L	1.01 mg/L	0.68 mg/L
003	Aluminum	285µg/L	416 µg/L	1,100 µg/L
	Zinc (freshwater)	163 µg/L	432 µg/L	37 µg/L
	Hardness	9.82 mg/L	-	-
	Nitrate plus Nitrite - Nitrogen	0.74 mg/L	0.74 mg/L	0.68 mg/L

After the inspection, Highview submitted to EPA a memorandum it had developed on January 26, 2024 (revised on May 3, 2024) to document how the facility met the AIM Level 1 response requirements in Part 5.2.3.1 of the Stormwater Permit (SWPPP review and the selection, design, installation, and implementation of the stormwater control measures to ensure the effectiveness of your existing measures). During the inspection and in the memo, Highview representatives indicated that they looked into the high concentrations of zinc in their stormwater runoff and determined that the facility does not store materials containing zinc outside that could contact rainwater. Instead, the facility concluded that the elevated zinc concentrations were from the galvanized roof materials used in the facility's buildings. Also, Highview conducted samples in different places for Discharge Point 001 to determine where the potential zinc contributions may be occurring from.

Routine Inspections: Pursuant to Part 3.1 of the Stormwater Permit, the facility have qualified personnel conduct routine inspections of the areas covered by the Stormwater Permit at least quarterly. EPA requested during the inspection, and later received, the facility's quarterly inspections since 2023.

Quarterly Visual Assessments: Pursuant to Part 3.2 of the Stormwater Permit, the facility must collect a stormwater sample from each discharge point and perform a visual assessment. EPA requested copies of the quarterly visual assessments done since January 2022 during the inspection. During discussions regarding the quarterly visual assessments, EPA learned that Ms. Stenli (Foth) had begun conducting Discharge Point 001 stormwater samples north of the identified discharge point, at the roof drain outfall. A subsequent review of the submitted quarterly visual assessments indicates that Sahara Tanner conducted some of the visual assessments in 2022.

Annual Reports: Pursuant to Part 7.4 of the Stormwater Permit, the facility has submitted an annual report to EPA via NeT-MSGP for 2022 and 2023.

Employee training: Although employee training materials are provided by Foth to certain Highview employees for stormwater training, EPA learned that there was not a log of dates on when employees received training.

Other Items Discussed:

- Highview representatives told EPA that all production occurs within the facility.
- Any salt used during the winter was kept inside in bags.
- Any drains in the production area are connected to the facility's septic system.
- Trash pickup onsite as needed.
- No wetlands located onsite.
- No coal-tar sealant used in the parking lot at the facility.
- No spills in the last 3 years.
- No vehicle maintenance done in areas exposed to stormwater at the facility.

Facility Walk-Through

At approximately 9:50 pm, Mr. Middleton, Mr. Small, Ms. Wojkiewicz, and Mr. Heroux began a walk-through of the Highview's outside areas, starting with the area around Discharge Point 002. During the walkthrough of the site, a light to moderate rain occurred. The EPA inspection team first observed the storm sewer inlet (Discharge Point 002) located in the southern portion of the parking lot south of the main production area lot (Photograph 1 in Attachment A). At the time of the inspection, water was flowing from the parking lot through Discharge Point 002. EPA then observed the western side of the building (Photograph 2 in Attachment A). Next EPA and Highview representatives walked east to Discharge Point 001 at the entrance of the parking lot south of the main production building within the ditch (Photograph 3 in Attachment A). Highview representatives indicated that Ms. Stenli had recently begun taking the Discharge Point 001 samples from a roof downspout upstream of Discharge Point 001. Photograph 4 in Attachment A shows the location of the roof downspout where this sample is obtained.

EPA and Highview representatives then walked north towards the material storage area located north of the main production building. While walking through a paved area east of the main production building, near a loading dock, EPA observed pallets and other raw materials stored in this location (Photograph 5 in Attachment A). EPA then noticed a slight oil sheen on the pavement in this area, likely originating from a vehicle (Photograph 6 in Attachment A). EPA also observed additional materials being stored up against the main production building's east wall and a number of material storage vessels (Photograph 7 in Attachment A). Mr. Heroux told EPA that the facility uses argon, oxygen, carbon dioxide, and nitrogen in its metal fabrication production and those compounds are stored here and supplied by Airgas.

EPA and Highview representatives then continued to the northwest to the material storage area north of the main production building. Once here, EPA and Highview representatives first walked along the north side of the main production building. EPA observed that there was both raw materials and scrap metal stored near the building, as shown in Photograph 9 in Attachment A. Additional raw materials were stored north of the building (Photographs 8 and 10 in Attachment A). EPA noted that all of the materials in this area are exposed to some degree to stormwater, with the material storage yard about half gravel and half paved (paved area closer to the building). EPA and Highview representatives then walked to the northwest corner of the material storage area in order for EPA to observe the north fence line (north of the material storage area). Mr. Heroux open the gate in this location so EPA could observe runoff from the material storage area to the undeveloped area (Photographs 11 and 12 in Attachment A). Although the site in this location was generally sloped to the north and runoff from the site did flow to the undeveloped area, EPA did not observe a discharge to Duck Creek or to the low area northwest of undeveloped area. Instead, the runoff from the material storage area was ponded in the undeveloped area at the time of this inspection. EPA also observed the center of the material storage area's north fence with most of the water ponded at the gate before reaching the undeveloped property (Photograph 13 in Attachment A). EPA took a picture of the material storage area's north fence line later during the walk-through of this material storage area, see Photograph 16 in Attachment A. EPA and Highview representatives then walked to the western portion of this material storage yard to observe a number of dumpsters (Photographs 14 and 15 in Attachment A). These dumpsters contained both scrap metal to be recycled and general garbage/recycling dumpsters. EPA and Highview representatives then left the north material storage area and headed east to the machine shop's outdoor storage areas.

When reaching the north outdoor storage area of the machine shop, EPA noticed large wooden crates (Photograph 17 in Attachment A). Highview representatives informed EPA that these crates are used for shipping finished fabricated products. EPA continued walking east along the north side of the machine shop, observing pallets and other metal products stored west of the large wooden grates (Photograph 18 in Attachment A). This storage area was almost entirely gravel (with the entrance to this storage area paved). The slope of the area was towards the middle of the material storage area where nothing was stored, although given the amount of rain occurring during the inspection, EPA observed some of this runoff flowing from the ponded area to the west (Photograph 19 in Attachment A). EPA and Highview representatives then walked through a vegetated area on the east side of the machine shop, observing a small ditch than ran on the far east side of the property (Photograph 20 in Attachment A). Next, EPA and Highview representatives observed the discharge coming from the machine shop's roof downspout on the southeast corner of the site (Photographs 21, 22, and 23 in Attachment A). The quarterly visual sample and any other stormwater sample for Discharge Point 003 is taken from the roof downspout, shown in Photograph 22 in Attachment A). From here, the runoff combines with the stormwater ditch that runs on the east property boundary and flows to the stormwater detention pond to the south (Photograph 24 in Attachment A).

EPA and Highview representatives then walked to the west to walk-through the southern portion of the machine shop. This area of the outdoor storage was gravel, except for the entrance from Bayview Drive. In this location, EPA observed additional shipping material and finished product storage, all exposed to stormwater (Photograph 25 in Attachment A). In the low point of this storage area, the facility had constructed a stormwater inlet (Photograph 26 in Attachment A) to drain the area to the roof downspout shown in Photograph 22 in Attachment A). EPA also observed an uncovered scrap metal dumpster in this area shown in Photograph 27 of Attachment A).

EPA finished its walk-through of the site at approximately 10:30 am and walked back to the facility's conference room for a closing conference.

Closing Conference

After a short discussion with the other EPA inspector, Mr. Middleton began the closing conference in the facility's conference room at approximately 10:40 am. Mr. Middleton, Mr. Mr. Small, Ms. Wojkiewicz, and Mr. Heroux were all present for the closing conference. EPA then went over the preliminary concerns it found during its inspection, some of which are listed below. EPA also told the Highview representatives that EPA would develop an inspection report that summarized its inspection of this facility and anticipated that it would provide a copy of the report in approximately 60 days to the facility. EPA then went over the documents that it had requested during the inspection and asked the facility to submit the information to EPA by Friday, May 3, 2024. EPA then confirmed from the Highview representatives that it had not obtained any information or taken any pictures that were considered CBI during this inspection. Finally, EPA informed the Highview representatives that they would be walking the stormwater runoff path down Bay Ridge Court to see where the runoff that flowed from Discharge Points 001 and 002 ended up. The closing conference ended at approximately 10:48am.

EPA ended the inspection and exited the facility at approximately 10:50 am.

Post Inspection Walk-through

Mr. Middleton and Mr. Small, without Highview representatives, starting walking down Bay Ridge Court to observe the deposition of stormwater runoff passing through Discharge Points 001 and 002. Photograph 28 in Attachment A shows the stormwater ditch that collects the stormwater runoff from most of the main production building south of Discharge Point 001. EPA then continued south on Bay Ridge Court, observing the stormwater within the same ditch to the west of Bay Ridge Court (Photographs 29 and 30 in Attachment A). When the ditch reaches the end of Bay Ridge Court, it appeared that the stormwater combined with a stormwater ditch north of Wisconsin State Route 54 (Photograph 31 in Attachment A). This ditch was sloped to the east, so EPA inspectors then crossed Bay Ridge Court and started walking east along the northside Wisconsin State Route 54 (Photograph 32 in Attachment A). Further down, approximately 100 yards from the intersection of Wisconsin State Route 54 and Bay Ridge

Court, EPA observed the stormwater detention pond north of Wisconsin State Route 54 (Photograph 33 in Attachment A). EPA observed that the stormwater ditch along Wisconsin State Route 54 did not flow into the stormwater detention pond. The discharge pipe from the stormwater detention did flow into the stormwater ditch (Photographs 34 and 35 in Attachment A). From this point, it appeared that the roadside stormwater ditch continued along Wisconsin State Route 54 to the east.

EPA ended its post-inspection walk-through at approximately 11:03 am.

DOCUMENTS OBTAINED AFTER THE INSPECTION:

On May 3, 2024, EPA received the following documents electronically from Ms. Wojkiewicz, by email.

- A. Highview Custom Fabricating's AIM memorandum, dated January 26, 2024 (updated on May 3, 2024)
- B. 2022 Facility Quarterly Visual Inspections
- C. 2023 Facility Quarterly Visual Inspections
- D. 2024 Facility Quarterly Visual Inspections
- E. 2023 Facility Quarterly Routine Inspections
- F. 2024 Facility Quarterly Routine Inspections
- G. 2022 Non-Stormwater Discharge Analysis
- H. 2022 Benchmark Sampling Results
- I. 2023 Benchmark Sampling Results
- J. 2024 Benchmark Sampling Results

AREAS OF CONCERN:

EPA has identified areas of concern based on findings during the inspection of the Highview Custom Fabricating facility and based on a post-inspection review of the information provided to EPA by facility representatives. An enumerated list of the areas of concern are listed below:

1. Housekeeping Issues: During the inspection, EPA observed the following housekeeping issues:
 - a. Uncovered scrap metal dumpster and roll-off boxes near main production area and the machine shop. Part 2.1.2.2.c requires dumpster lids closed when not in use. Note that for dumpsters and roll off boxes that do not have lids and could leak, the facility would need to ensure that discharges have a control (e.g., secondary containment, treatment). EPA is unclear if those dumpsters/roll boxes could leak.
 - b. During the inspection, EPA observed an oil sheen east of main production building (Photograph 6 in Attachment A). EPA is unclear when this oil was

leaked from a vehicle or other facility equipment. Note that Part 2.1.2.2 requires the facility to keep clean all exposed areas that are potential sources of pollutants.

2. 2022 Benchmark Sampling:
 - a. Facility did not take four quarterly samples for the required parameters for Discharge Point 002 and 003.
 - b. One of the ways specified in the Stormwater Permit for the calculation of hardness is using the equation in Appendix J: $\text{mg/L CaCO}_3 = 2.497 (\text{Ca mg/L}) + 4.118 (\text{Mg mg/L})$. Within the facility's sampling results, only calcium was sampled for. Therefore, the calculation of hardness is incomplete.
3. Stormwater Pond: During the inspection, EPA learned that the stormwater runoff from the Discharge Area 003 drains into a stormwater pond, constructed in 2007. EPA is unsure whom owns and maintains this stormwater pond.
4. 2023 Additional Stormwater Sampling:
 - a. Part 5.2.3.3 of the Stormwater Permit requires continuing quarterly benchmark monitoring for the next four quarters for the parameters that caused the AIM triggering event at all affected stormwater discharge points. EPA is unclear why the facility did not sample for zinc at Discharge Point 002, given that the 2022 benchmark sampling showed that a single sample exceed the threshold for zinc by four times (see footnote 12 on page 39 of the Stormwater Permit).
 - b. Samples conducted show elevated amounts (when compared to the benchmark threshold for Discharge Point 001/zinc (annual average exceeds threshold) and Discharge Point 003/zinc (annual average exceed threshold). Given these results, EPA is unclear why the January 26, 2024/May 3, 2024 AIM Level 1 memo did not indicate that the Highview facility would be in AIM Level 2 status (pursuant to Part 5.2.4 of the Stormwater Permit with no AIM exceptions demonstration included in the memo (Part 5.2.6 of the Stormwater Permit), if applicable.
 - c. One of the ways specified in the Stormwater Permit for the calculation of hardness is using the equation in Appendix J: $\text{mg/L CaCO}_3 = 2.497 (\text{Ca mg/L}) + 4.118 (\text{Mg mg/L})$. Within the facility's sampling results, only calcium was sampled for. Therefore, the calculation of hardness is incomplete.
5. EPA learned during the inspection that Highview was beginning to sample from the roof drain outlet pipe, upstream of Discharge Point 001 rather than at Discharge Point 001 itself. EPA is unclear if this was just the benchmark sampling that was done to get a better understanding of where the elevated zinc concentrations were coming from or if this was a permanent change for all sampling, including quarterly visual assessment sampling. If the benchmark sampling and/or quarterly visual assessment sampling location for Discharge Point 001 is permanently changed, then Highview needs to update its SWPPP. In addition, if the sampling location for Discharge Point 001 has been changed, EPA is concerned that this sampling location may not be representative of the entire stormwater runoff tributary area that flows to Discharge Point 001.

6. Routine Inspections: Part 3.1.6 of the Stormwater Permit requires the facility to document the findings of its facility inspections and maintain this report with your SWPPP. EPA did not received the routine inspections conducted in 2022 at the facility, when the facility submitted its inspection follow-up information on May 3, 2024.
7. Employee Stormwater/SWPPP Training: Part 6.2.5.1.e.iv of the Stormwater Permit requires the facility to log the dates on which specific employees receive stormwater/SWPPP training. During the inspection, EPA learned that Highview did not have the dates of when the employee stormwater/SWPPP training was conducted.
8. During the inspection, EPA did not observe a sign posted at the facility to indicate its Stormwater Permit coverage status, as required by Part 1.3.5 of the Stormwater Permit.
9. Stormwater Pollution Prevention Plan Review: EPA has reviewed the facility's SWPPP, dated September 2021, and compared it with the requirements in the facility's Stormwater Permit. EPA has the following observations regarding the facility's SWPPP:
 - a. Part 6.2.3.2 of the Stormwater Permit requires the facility to list potential pollutants associated with each industrial activity. Given the identified issues with the facility's metal roofs, the facility may need to add metal roofs as a pollution source with the pollutant being metals (zinc).
 - b. In Section 1.4 of the SWPPP, Highview indicates that Discharge Point 003 discharges to a vegetated swale to the south. During the inspection, EPA observed the vegetated swale to the south of Discharge Point 003, but it appeared that the swale discharged into the stormwater pond (Photograph 24 in Attachment A). The detail of this swale flowing into the stormwater pond is not included in Highview's SWPPP. Highview's SWPPP may need to be clarified if this vegetated swale does in fact flow into the stormwater pond. In addition, the SWPPP's Figure 2 and Figure 3 map may also need to be revised to identify the location the stormwater pond.
 - c. Table 2-1 in the SWPPP:
 - i. During EPA's inspection, EPA observed pallets and the storage of metal material in the loading dock area east of the main production building (see Photographs 5 and 7 in Attachment A). Table 2-1 in the SWPPP does not indicate metal storage or wooden pallet storage in this area of the facility.
 - ii. EPA learned during the inspection that the facility uses argon, oxygen, carbon dioxide, and nitrogen in its metal fabrication production and those compounds are stored in the loading dock area east of the main production building (Photograph 7 in Attachment A). This storage of these materials is not indicated in Table 2-1 of the SWPPP.

- d. Site Map (Figure 2 of the SWPPP):
 - i. During EPA's inspection, EPA observed pallets and the storage of metal material in the loading dock area east of the main production building (see Photographs 5 and 7 in Attachment A). The storage/presence of these materials is not identified in the SWPPP's site map.
 - ii. EPA learned during the inspection that the facility uses argon, oxygen, carbon dioxide, and nitrogen in its metal fabrication production and those compounds are stored in the loading dock area east of the main production building (Photograph 7 in Attachment A). The storage of these materials is not shown in Figure 2 of the SWPPP.

LIST OF ATTACHMENTS:

- A. Photograph Log

**Highview Custom Fabricating – Hobart, Wisconsin
U.S. EPA Inspection – April 17, 2024
All photos taken by Keith Middleton, Environmental Engineer, U.S. EPA
Camera: Canon PowerShot SX230 HS**

Note: Timestamp on the photographs are incorrect; photos were taken on April 17, 2024*



1: IMG_0979

Description: Runoff from Parking Lot to Discharge Point 002

Location: Highview Custom Fabricating Facility (Parking Lot – South of Main Production Building)

Camera Direction: South

Date/Time: April 17, 2024 – 9:50 am CDT



2: IMG_0980

Description: West Side of Main Facility Building

Location: Highview Custom Fabricating Facility (Parking Lot – South of Main Production Building)

Camera Direction: North

Date/Time: April 17, 2024 – 9:52 am CDT



3: IMG_0981

Description: Stormwater Ditch Downstream of Roof Downspout/Discharge Point 001

Location: Highview Custom Fabricating Facility

Camera Direction: North

Date/Time: April 17, 2024 – 9:55 am CDT



4: IMG_0982

Description: Close Up of Roof Downspout/Discharge Point 001 Sampling Point

Location: Highview Custom Fabricating Facility

Camera Direction: West

Date/Time: April 17, 2024 – 9:55 am CDT



5: IMG_0983

Description: Pallet and Material Storage – East of Main Production Building

Location: Highview Custom Fabricating Facility

Camera Direction: Southwest

Date/Time: April 17, 2024 – 9:58 am CDT



6: IMG_0984

Description: Oil Sheen

Location: Highview Custom Fabricating Facility – East of Main Production Building in Shipping Area

Camera Direction: North

Date/Time: April 17, 2024 – 9:58 am CDT



7: IMG_0985

Description: Liquid Oxygen and Other Production Materials Storage Tanks

Location: Highview Custom Fabricating Facility – East of Main Production Building

Camera Direction: West

Date/Time: April 17, 2024 – 9:58 am CDT



8: IMG_0986

Description: Material Storage Area

Location: Highview Custom Fabricating Facility – North of Main Production Building

Camera Direction: Northwest

Date/Time: April 17, 2024 – 10:00 am CDT



9: IMG_0987

Description: Production Material/Scrap Metal Storage

Location: Highview Custom Fabricating Facility – North of Main Production Building

Camera Direction: Southeast

Date/Time: April 17, 2024 – 10:02 am CDT



10: IMG_0988

Description: Metal/Raw Material Storage

Location: Highview Custom Fabricating Facility – North of Main Production Building

Camera Direction: Northwest

Date/Time: April 17, 2024 – 10:04 am CDT



11: IMG_0989

Description: Beyond Site Fence – North of Metal/Raw Material Storage

Location: Highview Custom Fabricating Facility – North of Main Production Building

Camera Direction: North

Date/Time: April 17, 2024 – 10:06 am CDT



12: IMG_0990

Description: Inside Site Fence – North of Metal/Raw Material Storage (South of IMG_0989)

Location: Highview Custom Fabricating Facility – North of Main Production Building

Camera Direction: North

Date/Time: April 17, 2024 – 10:07 am CDT



13: IMG_0991

Description: Gate – East of Gate Pictured in IMG_0989 and IMG_0990

Location: Highview Custom Fabricating Facility – North of Main Production Building

Camera Direction: North

Date/Time: April 17, 2024 – 10:08 am CDT



14: IMG_0992

Description: Scrap Metal Storage Roll-off Box

Location: Highview Custom Fabricating Facility – North of Main Production Building

Camera Direction: North

Date/Time: April 17, 2024 – 10:10 am CDT



15: IMG_0993

Description: Gate – Scrap Metal Roll-off Box and Recycling Dumpsters

Location: Highview Custom Fabricating Facility – North of Main Production Building

Camera Direction: Northwest

Date/Time: April 17, 2024 – 10:11 am CDT



16: IMG_0994

Description: Along the North Side Site Fence

Location: Highview Custom Fabricating Facility – North of Main Production Building

Camera Direction: West

Date/Time: April 17, 2024 – 10:12 am CDT



17: IMG_0995

Description: Gate – Shipping Crate Storage Area

Location: Highview Custom Fabricating Facility – North of Machine Shop

Camera Direction: Northeast

Date/Time: April 17, 2024 – 10:14 am CDT



18: IMG_0996

Description: Pallet and Shipping Crate Storage

Location: Highview Custom Fabricating Facility – North of Machine Shop

Camera Direction: West

Date/Time: April 17, 2024 – 10:16 am CDT



19: IMG_0997

Description: Pallet and Shipping Crate Storage (2)

Location: Highview Custom Fabricating Facility – North of Machine Shop

Camera Direction: Northwest

Date/Time: April 17, 2024 – 10:17 am CDT



20: IMG_0998

Description: Stormwater Ditch on East Side of Facility's Property

Location: Highview Custom Fabricating Facility – East of Machine Shop

Camera Direction: North

Date/Time: April 17, 2024 – 10:18 am CDT



21: IMG_0999

Description: Flow from Machine Shop Roof Downspout/Discharge Point 003

Location: Highview Custom Fabricating Facility – Southwest of Machine Shop

Camera Direction: South

Date/Time: April 17, 2024 – 10:18 am CDT



22: IMG_1000

Description: Flow from Machine Shop Roof Downspout (2)

Location: Highview Custom Fabricating Facility – Southwest of Machine Shop

Camera Direction: South

Date/Time: April 17, 2024 – 10:19 am CDT



23: IMG_1001

Description: Flow from Machine Shop Roof Downspout to Downstream Structure

Location: Highview Custom Fabricating Facility – Southwest of Machine Shop

Camera Direction: Southeast

Date/Time: April 17, 2024 – 10:19 am CDT



24: IMG_1002

Description: Flow Path Downstream of IMG_1001 to Stormwater Pond

Location: Highview Custom Fabricating Facility – Southwest of Machine Shop

Camera Direction: South

Date/Time: April 17, 2024 – 10:22 am CDT



25: IMG_1003

Description: Shipping Materials and Finished Product Storage

Location: Highview Custom Fabricating Facility – South of Machine Shop

Camera Direction: West

Date/Time: April 17, 2024 – 10:25 am CDT



26: IMG_1004

Description: Stormwater Inlet within Shipping Materials and Finished Product Storage

Location: Highview Custom Fabricating Facility – South of Machine Shop

Camera Direction: West

Date/Time: April 17, 2024 – 10:27 am CDT



27: IMG_1005

Description: Gate – Scrap Metal Dumpster

Location: Highview Custom Fabricating Facility – South of Machine Shop

Camera Direction: West

Date/Time: April 17, 2024 – 10:27 am CDT



28: IMG_1006

Description: Stormwater Ditch Downstream/South of Discharge Point 001

Location: Highview Custom Fabricating Facility – Along Bay Ridge Court

Camera Direction: South

Date/Time: April 17, 2024 – 10:51 am CDT



29: IMG_1007

Description: Stormwater Ditch Downstream/South of Discharge Point 001 (2)

Location: Highview Custom Fabricating Facility – Along Bay Ridge Court (West of Bayland Buildings)

Camera Direction: South

Date/Time: April 17, 2024 – 10:53 am CDT



30: IMG_1008

Description: Stormwater Ditch Downstream/South of Discharge Point 001 (3)

Location: Highview Custom Fabricating Facility – Along Bay Ridge Court (West of Bayland Buildings)

Camera Direction: North

Date/Time: April 17, 2024 – 10:54 am CDT



31: IMG_1009

Description: Stormwater Ditch Downstream/South of Discharge Point 001 (4)

Location: Highview Custom Fabricating Facility – Along Wisconsin State Route 54 (South of Bayland Buildings)

Camera Direction: East

Date/Time: April 17, 2024 – 10:55 am CDT



32: IMG_1010

Description: Stormwater Ditch Downstream/South of Discharge Point 001 (5)

Location: Highview Custom Fabricating Facility – Along Wisconsin State Route 54

Camera Direction: West

Date/Time: April 17, 2024 – 10:56 am CDT



33: IMG_1011

Description: Stormwater Pond

Location: Highview Custom Fabricating Facility – Along Wisconsin State Route 54
(Southeast of Facility)

Camera Direction: North

Date/Time: April 17, 2024 – 10:57 am CDT



34: IMG_1012

Description: Stormwater Pond Outfall Pipe

Location: Highview Custom Fabricating Facility – Along Wisconsin State Route 54

Camera Direction: East

Date/Time: April 17, 2024 – 10:57 am CDT



35: IMG_1013

Description: Stormwater Pond Outfall Pipe

Location: Highview Custom Fabricating Facility – Along Wisconsin State Route 54

Camera Direction: North

Date/Time: April 17, 2024 – 10:57 am CDT