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

Purpose: Compliance Evaluation Inspection

Facility: Befesa Zinc US Inc.
2701 East 114th Street
Chicago, Illinois 60617
41.68482160845534, -87.54572106929497

NPDES Permit Number: NA – Not Permitted

Date of Site Inspection: 11/05/2024

EPA Representatives:
Benjamin Atkinson, Inspector 312-353-8243
atkinson.ben@epa.gov

Valerie Dooling, Environmental Engineer 312-886-7167
dooling.valerie@epa.gov

Cheryl Burdett, Life Scientist 312-886-1463
Burdett.cheryl@epa.gov

State Representatives:
None

Facility Representatives:
Ivan Znika, Plant Manager 773-933-9274
Ivan.znika@befesa.com

Ruth Grissman
Purchasing Manager

Don Norton
Director of Operations

Gene Kessler
Plant Engineer

Report Prepared by: Benjamin D. Atkinson, Inspector

Inspector Signature: BENJAMIN ATKINSON Digitally signed by BENJAMIN ATKINSON Date: 2025.01.14 14:39:41 -06'00'

Approver Name and Title: Ryan J. Bahr, Section 2 Supervisor
Water Enforcement and Compliance Assurance Branch

Approver Signature and Date: Ryan Bahr Digitally signed by Ryan Bahr Date: 2025.01.14 16:43:00 -06'00'

1. BACKGROUND

The purpose of this report is to describe and document Befesa Zinc US Inc.'s compliance with the Clean Water Act (CWA) at its 2701 East 114th Street Chicago, Illinois site (the facility) on 11/5/2024. This inspection was performed pursuant to Section 308(a) of the Federal Water Pollution Control Act, as amended.

The facility sits on an approximately 33-acre parcel. The facility receives Electric Arc Furnace dust (EAF dust) by rail and truck. The EAF dust along with other Zing Bearing Material (ZBM) is processed into Waelz Oxide (WOX) and Iron Rich Material (IRM). The WOX is shipped out by rail to be refined into pure zinc and the IRM is shipped by barge. The facility operates under the NAICS code 331492 and SIC code 3341.

The facility is stated to be a zero-discharge facility with regards to water with both stormwater and sanitary wastewater being collected and utilized in process or as dust control. The facility does not have an NPDES Stormwater permit or a No Exposure Certification.

EPA previously inspected the facility 03/18/2022. This inspection was a follow up to observe the Facility during wet weather conditions.

2. SITE INSPECTION

Table 1: Site Entry and Opening Conference

Arrival Time:	8:40 AM	
Temperature:	65° F	
Precipitation:	Light rain at time of inspection. The Facility had received 0.18 inches of rain the previous day and 0.4 inches since midnight on the day of the inspection.	
Presented credentials?	Yes	
Credentials presented to whom and at what time?	Ivan Znika, Don Norton, Ruth Grissman	
Was an opening conference held? With whom?	Yes, Ivan Znika, Gene Kessler, Don Norton, Ruth Grissman	
If photographs or documents were taken, does the facility consider any to be Confidential Business Information (CBI)?		No
EPA vehicle parked in approved location?	Yes	

2.1 Opening Conference and Interview

Ben Atkinson, Valarie Dooling, and Cheryl Burdett (the Inspectors) arrived at the facility at approximately 8:40 AM. The Inspectors stopped at the security booth and presented their credential to the security guard who directed them to the Office Building. In the Office Building, the inspectors were greeted and led to an office to conduct the opening conference and interview portion of the Inspection. The Inspectors presented their credentials to Ruth Grissman, Don Norton, and Ivan Znika. The Inspectors explained the purpose of the inspection, the format of the inspection, the facility's right to claim certain information as Confidential Business Information, and what to expect following the Inspection.

The Inspectors explained that the EPA was returning to the site to follow up on potential concerns observed during the 03/18/2022 inspection and observe the Facility during wet weather.

The Inspectors asked what was done with the water collected in the Pond. The Facility stated that the water was used for cooling the IRM, kiln components, in process, and can be configured to be used as dust suppression inside the C&B building where the EAF is stored. Any excess water from the dust suppression in the C&B building is collected and returned to the Pond.

The Inspectors asked if water from the Pond was in the trucks used to spray for dust control outside of the buildings. The Facility stated that it could be used but that they were using city water at the moment. The Facility also stated that city water could be used in process but that it was infrequent.

The Inspectors asked if the Facility knew the source or cause of the white deposits observed in aerial imagery of the Facility. The Facility stated that it was calcium deposits from calcium in the IRM.

The Inspectors asked if the Facility would clarify how materials and products were brought into and out of the Facility. The Facility stated that EAF and ZBM were brought in by truck and train to the C&B building. Coke is brought in and stored in an enclosed coke storage building that was constructed approximately 4 years ago. The IRM is the only thing stored outdoors. Kiln clean out materials or kiln ruble is currently disposed of in a landfill.

The Inspectors asked from what the berm around the southern portion of the Facility was made. The Facility stated that the berm was constructed from a mixture of what was scraped from the storage yard or "back 40".

The Inspectors asked about the purpose of the TCLP testing done on the IRM and how frequently it was conducted. The Facility stated that the IRM was sold as a construction aggregate to be used in concrete and was required to meet certain requirements under federal and state law. They believed the reference was 40 CFR 266. They stated that once they had a pile of IRM built up, approximately every 2-3 weeks, they would have a TCLP test conducted and, once the results came back within the appropriate levels, the pile would be moved to the "back 40" outdoor storage yard. It was then shipped by barge.

The Inspectors asked if the Facility kept records of how much water is used in the trucks for dust control. The Facility stated that they did keep those records.

The Inspectors asked how the Facility collected storm water from the parts of the Facility that did not have stormwater collection drains. The Facility stated that they used portable pumps to move water out of low areas as needed.

The Inspectors asked what if any changes to the Facility had occurred since the 2022 inspection. The Facility stated that Kiln 1 had been brough on-line in 2023 and that the dike area was currently receiving updates including a new 15,000-gallon tank. They stated that frack tanks were temporarily being utilized near the dike area to collect sanitary water prior to it being utilized in-process.

The Inspectors asked how the Facility determined when an IRM pile was finished being built. The Facility stated that they attempted to keep the IRM piles under a certain height.

The Inspectors asked the Facility to explain how the air monitors around the Facility were utilized. The Facility stated that the air monitors tested for PM10 and when an air monitor alarm goes off it triggers a work order to investigate the source of the dust.

The Facility clarified that they only used the water trucks for dust suppression at the entrance to Facility (instead of the "back 40" storage yard) in very dry conditions when road dust could trigger the air monitors. They also stated that made certain to only use city water for dust control at the entrance.

The Inspectors asked the Facility to explain how they handled snow at the Facility. The Facility stated that they push snow to low use areas and allow it to melt and the runoff either infiltrated or was collected with the rest of the stormwater.

2.2 Facility Walkthrough

The Inspectors began the walkthrough of the Facility in the northwest corner on East 114th Street. Facility Personnel stated that the area along the entrance to the Facility is 114th Street but that the city allows the Facility to use it as employee parking and that the Facility maintains the pavement. Additionally, Facility Personnel stated that the vegetated area to the north of the northeast portion of the Facility is actually 114th Street easement and is not owned by the Facility. The Inspectors observed standing stormwater in low areas on the E 114th Street/parking area. The Inspectors observed that on the north side of the E 114th Street/parking area, there was a slight berm, a chain link fence, and a swale that appeared to be sloped to the east (photos 1-5). The Inspectors walked east to where the pavement ended on E 114th Street and then back west to the Facility entrance. The Inspectors walked south to the north access road observed a storm water collection drain (photo 6). Facility personnel stated this drain flowed to stormwater collation pit # 3

and was pumped to the Storage Pond. The Inspectors observed the location of stormwater collection pit #3 (photo 7). The Inspectors continued walking east along the north access road and observed the pump house. The Inspectors observed a hose lying on the ground routed through the pump house door (photos 8 and 9). Facility personnel stated that the hose was used to pump ground water out of the pump house. On the east side of the pump house, the Inspectors observed a red hose attached to a pipe (photo 10). Facility personnel stated that the hose was connected to city water and was used to fill the water trucks for dust control spraying. East of the pump house, the Inspectors observed a drain which was covered with filter fabric (photo 11). The Inspectors asked why this drain was different (covered with filter fabric) from the other drains observed and the Facility personnel stated that they were unsure.

The Inspectors continued east and observed the diked area including the reception/pump pit and temporary frac tanks (photos 12 and 13). The Inspectors walked around the north end of the diked area and observed the concrete berm along the north side of the Facility. The Inspectors observed that there was standing water on the south side of the berm but no observed water on the north side (photo 14).

The Inspectors walked east and observed a round concrete structure covered by an expanded metal grate with what appeared a non-operational electric control box mounted above it (photos 15-17, and 20). The Inspectors observed standing water around and in the concrete structure. In the area around the round concrete structure, the Inspectors observed storage totes and standing water with what appeared to be an oil sheen (photos 18 and 19). The Inspectors also observed roofing debris on the north side of the concrete berm (photo 21).

The Inspectors walked east to the east end of the concrete berm (photo 23). The Inspectors then walked south and observed IRM being stored on the southwest side of the unused concrete silos (photo 24). The Inspectors then walked around the silos and north along east edge of the Facility along the Calumet River and observed the area where the stormwater swale north of the Facility would flow into the Calumet River (photo 26). No flow was observed at the time of the Inspection. The Inspectors then walked south along east side of the Facility and observed the asphalt berm along the eastern edge of the Facility (photos 25 and 27). EPA observed a structure extending out over the bank of the Calumet River which appeared to contain a pump and electrical equipment (photos 27-32). The Facility personnel stated that the structure was a remnant from previous owners of the site and was not used by the Facility. The Inspectors continued to walk south along the east side of the Facility and observed the asphalt berm, a concrete barrier in the barge loading area, and the large berm along the east side of the Facility south of the concrete barrier (photos 33-42). At the sound end of the barge loading area where the asphalt berm and concrete barrier end and the large berm begins, the Inspectors observed that there was area between the berms where stormwater may have a potential to flow toward the Calumet River.

The Inspectors then walked west along the berm on the south side of the Facility. The Inspectors observed a white PVC pipe protruding from a pile of debris near the southwest corner of the Facility (photo 43). Facility personnel stated they did not believe that the pipe was connected to anything. No flow was observed at the time of the Inspection.

The Inspectors also observed a blue hose extending from a low area with standing toward the southern edge of the Facility (photo 44). Facility personnel stated that the Facility utilized portable pumps to move stormwater from low lying areas to the stormwater storage system during heavy precipitation and the hose had been laid here to keep it out of the way of truck and rail traffic.

The Inspectors walked west to where rail lines entered the Facility and observed a collection pit with a hose protruding out of it (photos 45-47). The Facility personnel stated that were stormwater to accumulate in this area, a pump could be attached to the hose to pump water out of the area into the stormwater management system. The Inspectors also observed perforated black corrugated pipe under the rail lines to allow stormwater to flow under the tracks to the north (photo 48). The Inspectors walked east and observed the low area with standing stormwater as well as the other end of the hose observed in Photo 44 and other flat hoses (photo 49).

The Inspectors then walked to the south side of Pond and observed a pipe on the east side discharging into the Pond (photo 50). The Inspectors then walked west, north, east, and then south around the Pond to the northeast side and observed the pipe discharging into the Pond again (photos 51 and 52). The Inspectors then continued walking around the Pond to the south side and walked north along the west access road on the west side of the Pond. The Inspectors observed stormwater flowing north along the access road to a stormwater drain (photos 53-55). The Facility personnel stated that this drain was connected to the stormwater management system and pumped to the Pond.

2.3 Closing Conference and Post-Inspection

Following the walkthrough of the Facility, the Inspectors held a closing conference in the office building. During the closing conference, the Inspectors asked if the following information was available:

1. A flow diagram showing the stormwater collection system
2. Documentation of the stormwater drain east of the pump building
3. TCLP results
4. Rain Gauge Data
5. Pond as-built records documenting storage volume
6. Maximum design storm for stormwater management
7. An updated Intigrated Contingency Plan with SWPPP

The Facility personnel stated that they thought the information would likely be available but that it would take time to compile the information. The Inspectors stated that they would reach out if it was determined that the information was needed.

The Inspectors stated that they had four areas of concern:

1. If water containing pollutants were used for dust control in the East 114th Street/Parking area and that water were to flow to the swale north of the Facility and into the Calumet River, that would constitute a discharge.
2. The stormwater drain east of the pump building may be connected to a municipal storm drain and any stormwater that reached that drain may be discharged.

3. The potential for stormwater to flow toward the Calumet River at the south end of the barge loading area between where the asphalt berm stoped and the large berm began.
4. The area at the southwest corner of the Facility where the rail lines enter the Facility has the potential for stormwater to flow off the site if not monitored and managed appropriately.

3. LIST OF ATTACHMENTS

A) Aerial photo with selected observations from inspection identified
B) Photo Log

Attachment A


E 114th Street/Parking
Dike Area
Foreman's Office
Pump House
Office Building
Structure on Calumet River Is Obscured by the Concrete Silos
Circular Concrete Structure
Pond
Stormwater Collection Sump Pit
Barge loading area
"Back 40"
N
W
E
S
1 inch = 175 feet
Befesa Zinc US Inc.
2701 East 114th Street
Chicago, Illinois 60617
41.68482160845534, -87.54572106929497
Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

Attachment B

Befesa Zinc US Inc.
EPA Inspection November 5, 2024
All photos taken by Benjamin Atkinson, Inspector, U.S. EPA
Camera: RICOH WG-4 GPS

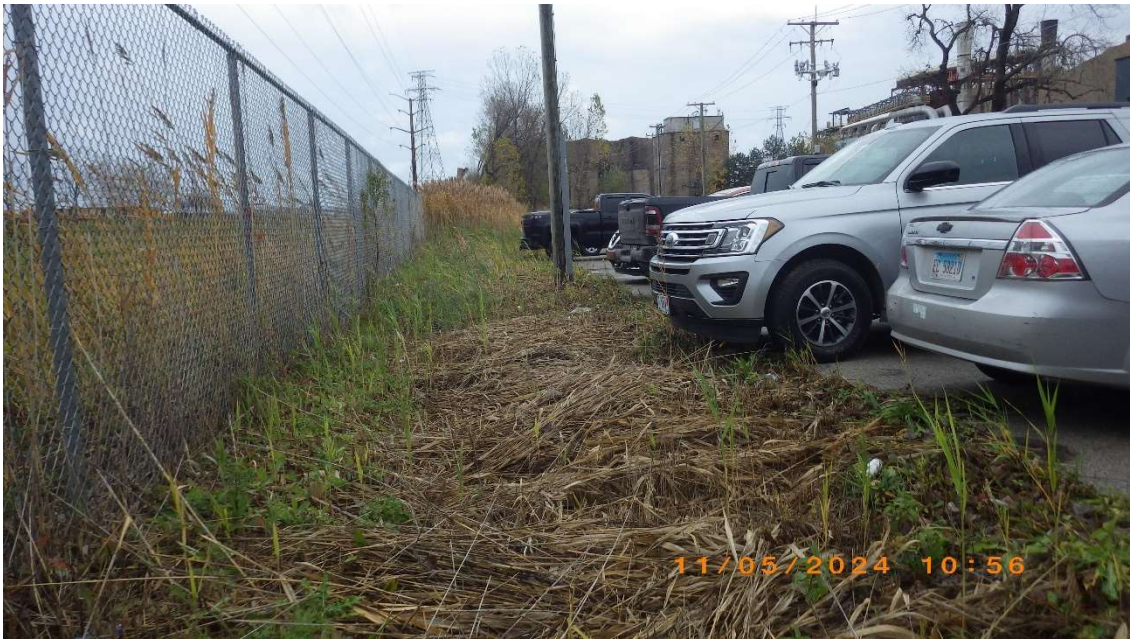
Note: The timestamps in the photos was erroneously set to Eastern time. The correct times are listed in the descriptions.

Note: Duplicate photos were taken by IPad.

1: RIMG0001
Description: Looking north between cars parking on E 114th Street toward drainage swale north of the Facility.
Location: E 114th Street northwest of the Facility.
Camera Direction: North Date/Time: November 5, 2024 9:50 AM

2: RIMG0002
Description: Looking west along E 114th Street from the northwest corner of the Facility.
Location: Northwest corner of the Facility.
Camera Direction: West Date/Time: November 5, 2024 9:55 AM

3: RIMG0003
Description: Looking east along E 114th Street. The Facility uses this area as parking.
Location: Northwest corner of the Facility.
Camera Direction: East Date/Time: November 5, 2024 9:55 AM



4: RIMG0004
Description: Looking east along the north side of E 114th street (right) and the drainage ditch (left).
Location: Northwest side of the Facility.
Camera Direction: East Date/Time: November 5, 2024 9:56 AM

5: RIMG0005
Description: Looking south toward the northern entrance to the Facility from the north side of E 114th Street.
Location: North side of the Facility.
Camera Direction: South Date/Time: November 5, 2024 9:57 AM

6: RIMG0006
Description: Stormwater collection grate (red arrow) in internal road southeast of office.
Location: Southeast of office.
Camera Direction: Southwest Date/Time: November 5, 2024 10:01 AM

7: RIMG0007
Description: Stormwater collection pit #3.
Location: South of office building.
Camera Direction: Southwest Date/Time: November 5, 2024 10:02 AM

8: RIMG0008
Description: Interior of pump house on the north side of the Facility. Hose is attached to a sump pump. Facility personnel stated that ground water in the building requires water to be pumped out regularly.
Location: North side of the Facility.
Camera Direction: North Date/Time: November 5, 2024 10:09 AM

9: RIMG0009
Description: End of hose shown in photo 8. Facility personnel noted that water would go to the storm water collection system and be sent to the storm water pond.
Location: North side of the Facility.
Camera Direction: Southeast Date/Time: November 5, 2024 10:10 AM

10: RIMG0010
Description: Red hose connected to faucet outside pump house. Facility personnel stated that the hose was used when filling dust control trucks with city water.
Location: East side of pump house.
Camera Direction: West Date/Time: November 5, 2024 10:10 AM

11: RIMG0011
Description: Storm drain located between pump house and foreman's office. Note that this drain has a filter fabric. When asked why this storm drain was different, facility personnel stated that they were unsure.
Location: North side of the Facility between the pump house and foreman's office.
Camera Direction: North Date/Time: November 5, 2024 10:13 AM

12: RIMG0012
Description: Reception and pump pit for stormwater located on the west side of the dike area. Note the blue hoses used to convey flow to the temporary frac tanks being utilized for storage while the dike area is being upgraded.
Location: Northeast side of the Facility.
Camera Direction: East Date/Time: November 5, 2024 10:17 AM

13: RIMG0013
Description: Frac tanks adjacent to the diked area.
Location: Northeast side of the Facility.
Camera Direction: Southwest Date/Time: November 5, 2024 10:17 AM

14: RIMG0014
Description: Looking down at concrete berm along the north side of the Facility. Note water on south side of the berm (left). No water was observed on the north side of the berm.
Location: Northeast side of the Facility.
Camera Direction: Down Date/Time: November 5, 2024 10:24 AM

15: RIMG0015
Description: A cylindrical concrete structure covered by an expanded metal grate. Water was observed around and in the structure.
Location: Northeast side of the Facility, east of the dike area.
Camera Direction: Down. Date/Time: November 5, 2024 10:24 AM

16: RIMG0016
Description: Concrete berm along the north side of the Facility.
Location: Northeast side of the Facilty, north of the cylindrical concrete structure.
Camera Direction: Down Date/Time: November 5, 2024 10:25 AM

17: RIMG0017
Description: Electric control box located at cyclindrical concrete structure.
Location: Northeast side of the Facility, east of the dike area.
Camera Direction: West Date/Time: November 5, 2024 11:25 AM

18: RIMG0018
Description: Stormwater standing in northeast part of the Facility around storage totes.
Location: Northeast side of the Facility, east of the dike area.
Camera Direction: East Date/Time: November 5, 2024 10:26 AM

19: RIMG0019
Description: Stormwater standing in northeast part of the Facility around storage totes.
Location: Northeast side of the Facility, east of the dike area.
Camera Direction: East Date/Time: November 5, 2024 10:27 AM

20: RIMG0020
Description: A cylindrical concrete structure covered by an expanded metal grate. Water was observed around and in the structure.
Location: Northeast side of the Facility, east of the dike area.
Camera Direction: Down Date/Time: November 5, 2024 10:28 AM

21: RIMG0021
Description: Corrugated roofing pieces blown into the area north of the Facility.
Location: Northeast side of the Facility.
Camera Direction: North Date/Time: November 5, 2024 10:33 AM

22: RIMG0022
Description: Looking down at concrete berm along the north side of the Facility. Note water on south side of the berm (left). No water was observed on the north side of the berm.
Location: Northeast side of the Facility. Northeast of the dike area.
Camera Direction: Down Date/Time: November 5, 2024 10:33 AM

23: RIMG0023
Description: East end of the concrete berm on the north side of the Facility.
Location: Northeast corner of the Facility, north side of the northern concrete silo.
Camera Direction: East Date/Time: November 5, 2024 10:36 AM

24: RIMG0024
Description: Looking north along the south side of the concrete silos located at the northeast corner of the Facility. Note the black Iron Rich Material bering stored in this area.
Location: Southwest of concrete silos located at northeast corner of the Facility.
Camera Direction: North Date/Time: November 5, 2024 10:40 AM

25: RIMG0025
Description: North end of asphalt berm located along the northeast side of the Facility.
Location: Northeast corner of the Facility, East of the concrete silos.
Camera Direction: Southeast Date/Time: November 5, 2024 10:43 AM

26: RIMG0026
Description: Looking north along the west bank of the Calumet River from the northeast corner of the Facility. This is the area that appeared to be where the stormwater swale north of the Facility would flow into the Calumet River. No flow observed at the time of the inspection.
Location: Northeast corner of the Facility.
Camera Direction: North Date/Time: November 5, 2024 10:47 AM

27: RIMG0027
Description: Looking south along the asphalt berm along the northeast side of the Facility.
Location: Northeast corner of the Facility along the Calumet River.
Camera Direction: South Date/Time: November 5, 2024 10:47 AM

28: RIMG0028
Description: Structure on the bank of the Calumet River on the northeast side of the Facility.
Location: Northeast side of the Facility.
Camera Direction: Southeast Date/Time: November 5, 2024 10:49 AM

29: RIMG0029
Description: Looking southeast along the east side of the Facility.
Location: Adjacent to structure on the bank of the Calumet River on the northeast side of the Facility.
Camera Direction: Southeast Date/Time: November 5, 2024 10:50 AM

30: RIMG0030
Description: The asphalt berm adjacent to the structure on the bank of the Calumet River.
Location: Northeast side of the Facility.
Camera Direction: Southeast Date/Time: November 5, 2024 10:50 AM

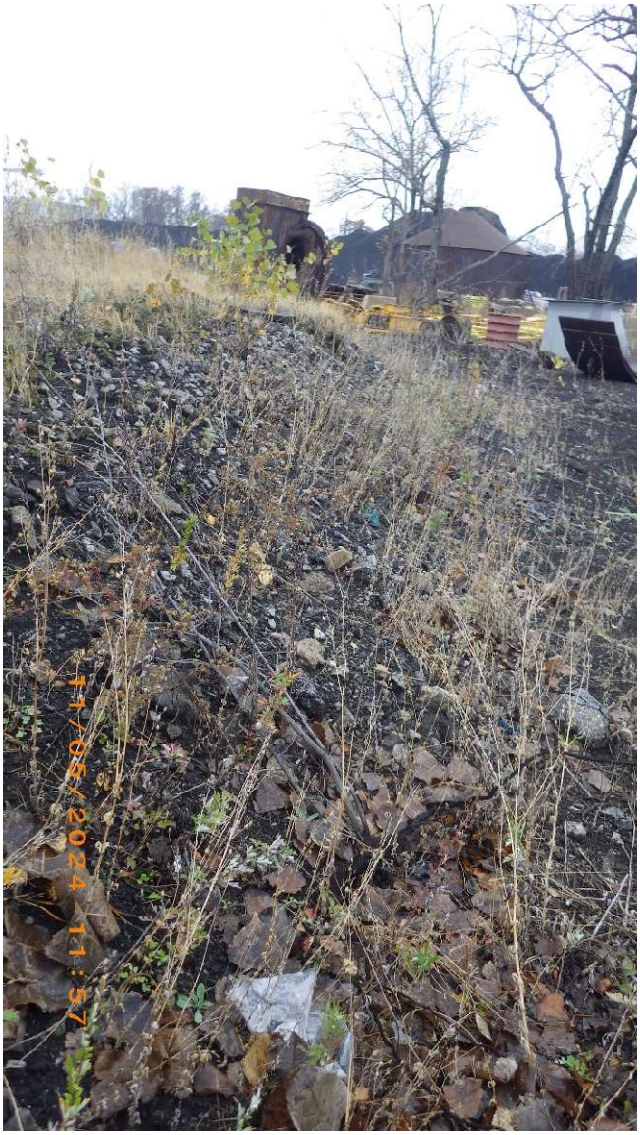
31: RIMG0031
Description: Interior of the structure on the Bank of the Calumet River on the northeast side of the Facility.
Location: Northeast side of the Facility.
Camera Direction: East Date/Time: November 5, 2024 10:59 AM

32: RIMG0032
Description: North side of the structure on the Calumet River.
Location: Northeast side of the Facility.
Camera Direction: East Date/Time: November 5, 2024 10:50 AM

33: RIMG0033
Description: Looking south along the east side of the Facility. Note the asphalt berm between the concrete barrier and corrugated metal wall along the Calumet River.
Location: East side of the Facility.
Camera Direction: South Date/Time: November 5, 2024 10:53 AM

34: RIMG0034
Description: Looking south along the east side of the Facility between the concrete barrier and the asphalt berm.
Location: East side of the Facility along the Calumet River.
Camera Direction: South Date/Time: November 5, 2024 10:54 AM

35: RIMG0035
Description: Looking northeast along the east side of the Facility between the concrete barrier and asphalt berm.
Location: South end of the concrete barrier on the east side of the Facility.
Camera Direction: Northeast Date/Time: November 5, 2024 10:57 AM



36: RIMG0036
Description: Looking south along the berm on the southeast side of the Facility, south of the concrete barrier.
Location: East side of the Facility south of the concrete barriers.
Camera Direction: South Date/Time: November 5, 2024 10:57 AM

37: RIMG0037
Description: Looking south along the top of the berm on the southeast side of the Facility. The Calumet River is to the left.
Location: Southeast side of the Facility along the Calumet River.
Camera Direction: South Date/Time: November 5, 2024 10:58 AM

38: RIMG0038
Description: Looking north along the top of the berm on the southeast side of the Facility. The Calumet River is to the right.
Location: Southeast side of the Facility along the Calumet River.
Camera Direction: North Date/Time: November 5, 2024 10:59 AM

39: RIMG0039
Description: Looking north between the berm on the southeast side of the Facility (left) and the bank of the Calumet River (right).
Location: Southeast side of the Facility.
Camera Direction: North Date/Time: November 5, 2024 11:03 PM

40: RIMG0040
Description: Looking northeast from the top of the berm at the southeast corner of the Facility.
Location: Southeast corner of the Facility.
Camera Direction: Northeast Date/Time: November 5, 2024 11:10 PM

41: RIMG0041
Description: Looking north from the top of the berm at the southeast corner of the Facility.
Location:Southeast corner of the Facility.
Camera Direction: North Date/Time: November 5, 2024 11:10 PM

42: RIMG0042
Description: Looking northwest from the top of the berm at the southeast corner of the Facility.
Location: Southeast corner of the Facility.
Camera Direction: Northwest Date/Time: November 5, 2024 11:10 PM

43: RIMG0043
Description: White PVC pipe protruding from a pile of debris near the southwest corner of the Facility. Facility personnel stated that they did not think the pipe was connected to anything.
Location: Southwest corner of the Facility.
Camera Direction: Northwest Date/Time: November 5, 2024 11:20 AM

44: RIMG0044
Description: Blue hose on ground at the southwest corner of the Facility. Facility personnel stated that they suspected that the hose had been placed there after stormwater dewatering had occurred to pump standing stormwater to stormwater collection.
Location: Southwest corner of the Facility.
Camera Direction: North Date/Time: November 5, 2024 11:21 AM

45: RIMG0045
Description: Stormwater collection location on the north side of the rail line entering the Facility. Facility personnel stated that this was a sump pit that could be used to pump stormwater from the area to stormwater collection, but that it was not regularly used. EPA noted that the hose coming out of the pit was cracked.
Location: Southwest corner of the Facility where the rail lines enter the Facility.
Camera Direction: North Date/Time: November 5, 2024 11:24 AM

46: RIMG0046
Description: Looking southeast from the north side of the train tracks where the rails enter the Facility.
Location: Southwest corner of the Facility
Camera Direction: Southeast Date/Time: November 5, 2024 11:24 AM

47: RIMG0047
Description: Looking down into the stormwater collection location.
Location: Southwest corner of the Facility where the rail lines enter the Facility.
Camera Direction: Down Date/Time: November 5, 2024 11:24 AM

48: RIMG0048
Description: Looking south across the rail lines as they enter the Facility. Note the corrugated black pipe under the rail lines.
Location: Southwest corner of the Facility where the rail lines enter the Facility.
Camera Direction: South Date/Time: November 5, 2024 11:27 AM

49: RIMG0049
Description: Looking southeast at stormwater collection point with hoses lying adjacent. Facility personnel stated that in periods of high precipitation, portable pumps would be used to pump this area to the stormwater collection system and that the hoses are used for that purpose.
Location: Southwest side of the Facility, south of the rail lines.
Camera Direction: Southeast Date/Time: November 5, 2024 11:28 AM

50: RIMG0050
Description: Looking northeast across the Pond.
Location: South side of the Pond.
Camera Direction: Northeast Date/Time: November 5, 2024 11:31 AM

51: RIMG0051
Description: Looking southwest from the north end of the east side of the Pond. Note the pipe discharging to the Pond (red arrow).
Location: North end of the east side of the Pond.
Camera Direction: Southwest Date/Time: November 5, 2024 11:36 AM

52: RIMG0052
Description: Looking west across the Pond from the north end of the east side of the pond.
Location: North end of the east side of the Pond.
Camera Direction: West Date/Time: November 5, 2024 11:36 AM

53: RIMG0053
Description: Looking north along the access road on the west side of the Pond. Stormwater in this area was observed to be flowing north to a stormwater drain.
Location: Southwest corner of the Pond.
Camera Direction: North Date/Time: November 5, 2024 11:40 AM

54: RIMG0054
Description: Stormwater drain located in the access road on the west side of the Pond.
Location: Northwest corner of the Pond.
Camera Direction: North Date/Time: November 5, 2024 11:42 AM

55: RIMG0055
Description: Looking south along the access road on the west side of the Pond.
Location: Northwest corner of the Pond.
Camera Direction: South Date/Time: November 5, 2024 11:42 AM