REGION 3
PHILADELPHIA, PA 19103

Report Title:	Clean Water Act Compliance Inspection Report
Inspection Date(s):	09/25/2024
Regulatory Program(s):	National Pollutant Discharge Elimination System (NPDES)
Type of Activity:	Industrial Wastewater & Stormwater Inspection
Site/Facility Name:	Tradepoint Atlantic Shipyard
Permittee(s):	Tradepoint Atlantic & U.S. Wind
Site/Facility Operator:	Tradepoint Atlantic & U.S. Wind
Site/Facility Address:	6995 Bethlehem Boulevard Edgemere, MD 21219
Latitude:	39°14'10"N **Longitude:** -76°28'37"W
County/Parish:	Baltimore County
Permit Number:	Four total permits: MD0001201, MDR003099, IU Permit (#1711), MD0001180, MDR003791
NAICS Code:	336611, 423930 **SIC:** 3731, 5093
Unique Project #:	ECAD-522

Site/Facility Representative(s): **Point of Contact**

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Laurie Jodziewicz (U.S. Wind) ☒
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	EDWARD SIMAS Digitally signed by EDWARD SIMAS Date: 2024.12.23 08:41:08 -08'00'	12/23/2024
Report Preparer Signature/Date	Edward Simas (3ED32), NPDES Section 1	Date
	MARK ZOLANDZ Digitally signed by MARK ZOLANDZ Date: 2024.12.23 13:02:56 -05'00'	12/23/2024
Supervisor Signature/Date	Mark Zolandz, NPDES Section 1 Chief	Date

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I. Introduction

On September 25, 2024, an inspection team composed of staff from the U.S. Environmental Protection Agency ("EPA") Region 3 (hereinafter, "EPA Inspection Team") conducted an industrial wastewater and stormwater inspection of the Tradepoint Atlantic Shipyard and U.S. Wind Inc.(hereinafter, "the facility"). The purpose of the inspection was to observe compliance with the Clean Water Act (CWA) and to verify compliance with all of the following facility's Maryland Department of the Environment ("MDE") National Pollutant Discharge Elimination System (NPDES) Permits and applicable State and Federal regulations:

(1) MD0001180 (U.S. Wind Inc.): Permits U.S. Wind Inc. to discharge from the shipyard through Outfalls 023, 026, 027, and 028 to the Patapsco River.

(2) MDR003791 (U.S. Wind Inc.): Permits U.S. Wind Inc. to discharge industrial stormwater into the Baltimore Harbor from the portion of the shipyard leased to US Wind that is currently unstaffed and inactive.

(3) Industrial User ("IU") Permit #1711 (Tradepoint Atlantic Shipyard): Permits Tradepoint Atlantic to discharge industrial wastewater from the shipyard to the Baltimore County Sewer System.

(4) MD0001201 (Tradepoint Atlantic Shipyard): Permits Tradepoint Atlantic to discharge from the industrial park through outfalls 014, 022, 012, 013, 021, and stormwater-only outfalls 001, 016, 017, 059, 065, 069, and 071 to the Baltimore Harbor.

(5) MDR003099 (Tradepoint Atlantic Shipyard): Permits Tradepoint Atlantic to discharge industrial stormwater from the Eastern Recycling Operation to the Baltimore Harbor.

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A. Inspection Opening Conference

The EPA Inspection Team arrived at the facility at est. 8:00AM for the inspection. Inspectors met with the following facility representatives:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region 3 Inspectors and Contractors			
Edward Simas	U.S. EPA	(215) 814-2120	Simas.Edward@epa.gov
Dominic Cotton	U.S. EPA	(215) 814-2046	Cotton.Dominic@epa.gov
Amrita Gupta	U.S. EPA	(215) 814-3298	Gupta.Amrita@epa.gov
Site/Facility Representatives			
Matthew Newman	Tradepoint Atlantic Shipyard	(443) 791-9046	mnewman@tradepointatlantic.com
Peter Holland	Tradepoint Atlantic Shipyard	(443) 867-0624	Pholland@tradepointatlantic.com

Laurie Jodziewicz	U.S. Wind Inc.	(410) 340-9428	l.jodziewicz@uswindinc.com
Gener Gotiangco	U.S. Wind Inc.	(410) 340-9523	G.gotiangco@uswindinc.com
State or County Representatives			
No State/Local Representatives Present			

Edward Simas and Dominic Cotton displayed their credentials to facility representatives at the outset of the inspection, and explained the purpose of the inspection was to observe compliance with its Permits. A copy of each Permit is provided within the attachments package of the report. The EPA Inspection Team informed all representatives of U.S. Wind Inc. and Tradepoint Atlantic Shipyard that any information that the Facility deemed to be confidential business information ("CBI") should be identified to EPA representatives during the inspection and it would be handled as CBI according to EPA's CBI procedures.

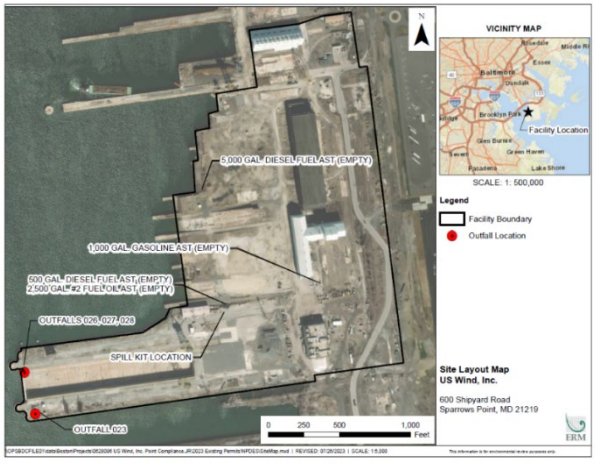
B. Weather and Precipitation Conditions

During the inspection, weather was cloudy. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and 5 days prior are provided in the Table 2 below:

Table 2. Precipitation Data

Station Name	Date	Precipitation Amount (inches)[1]
Maryland Science Center, MD USW00093784	9/20/2024	0.00
Maryland Science Center, MD USW00093784	9/21/2024	0.01
Maryland Science Center, MD USW00093784	9/22/2024	1.12
Maryland Science Center, MD USW00093784	9/23/2024	0.11
Maryland Science Center, MD USW00093784	9/24/2024	0.06
Maryland Science Center, MD USW00093784	9/25/2024	0.34

C. Summary of the Facility



Facility Map (Southern Portion) **Facility Map (Northern Portion)**

Facility History

Tradepoint Atlantic Shipyard purchased the entire property of the former Bethlehem Steel industry in 2014. Prior to Tradepoint's ownership, the Barletta group owned the facility and the facility name was known as "BWI Sparrows Point". Bethlehem Steel operated up until the early 2000's before shutting down. In the past, Bethlehem Steel manufactured World War warships. The facility is composed of multiple unoccupied warehouses that may have historically been heavy manufacturing areas composed of complex operations such as forging iron and steel parts. The facility used to receive non-contact cooling recycled water from Back River Wastewater Treatment Plant which would discharge to now sealed portions of outfalls near the scrap metal yard of the facility. Previous projects from Bethlehem Steel included aiding in the construction of the George Washington Bridge in New York and Golden Gate Bridge in California. Bethelhem Steel was a major supplier of armor plate and ordinance in the U.S. World War I and II. The current owner (Tradepoint Atlantic) leases portions of the former Bethlehem Steel property to various businesses including an: Amazon warehouse, Volkswagen vehicle dealership, scrap metal yard, U.S. Wind Inc., and several more retail businesses. Each facility includes its own permit or is permitted under Tradepoint Atlantic. Currently, the facility is divided into a northern portion and southern portion as documented in each facility's Stormwater Pollution Prevention Plan ("SWPPP") map (Attachment 7 & Attachment 8). These maps from each SWPPP are also displayed above at the beginning of the "Summary of Facility" section. The southern portion is leased and permitted under US Wind while the northern portion is permitted under Tradepoint Atlantic. The northern portion is composed of an impervious area of 16 acres and the southern portion is leased by U.S. Wind Inc composed of a total of 72.7 impervious acres.

Graving Dock

A 32ft deep graving dock that is capable of working on multiple ships at once is located on the southern portion of the facility. The graving dock is permitted under permit No. MD0001180 for berthing pier usage, shipping/receiving of cargo, and occasional ship repairs. The gravity dock is on the portion of the facility leased by U.S. Wind Inc. and Tradepoint Atlantic has transferred permit No. MD0001180 to U.S. Wind effective on June 30th ,2024 (Attachment 2). A vessel can receive below the water line repairs such as painting, reattachment of bolts, and other exterior items. It is not currently utilized, however the facility has stated that it is still operable if any vessels would like to receive maintenance on the dock. Facility representatives stated that the last vessel that received exterior maintenance on the graving dock was about two years ago, and all water in contact with the vessel was discharged to Baltimore County Sanitary Sewer System through the facility's Industrial User ("IU") discharge permit #1711 (Attachment 4). In the last 10 years, there has only been two instances that the graving dock has been utilized. An entrance

gate to the graving dock floats up once there is equilibrium between the water in the Patapsco River and inside of the dock. There are flood outfalls historically named Outfall 022 and Outfall 025 that drain the water once the vessel has entered into the graving dock.

Air Stripping System & Carbon Filtration Water Treatment System

An air stripping system alongside carbon filtration is utilized for water treatment due to the historical contamination of benzene within the Tradepoint Atlantic Property. The contamination arose from the facility's previous history large scale shipbuilding and maintenance history from the era of Bethlehem Steel. Water inside of the graving dock flows into a sump and enters into the air stripping system. Water flows through a column mixed with an air stream. The air flowing up captures the benzene within the contaminated water leaving clean water at the bottom. The quantities of benzene that are evaporated are then recaptured and adsorbed into by a bed of activated carbon. Photos R0010150 – R0010156 display the process of the air stripping system up until discharge to Outfall 023.

General information on Permit No. MD0001201

Permit No. MD0001201 is historical similar to the graving docks. Facility representatives stated that it was a permit for treating process water in use at the facility's warehouses and later treated at the on-site wastewater treatment plant. In the past, wastewater in contact from steel mill processes would be sent to the treatment plant prior to discharge into the Patapsco River. The wastewater treatment plant was not visited during the inspection, however facility representatives stated that it currently only receives non-contact stormwater and discharge from a private bottling plant. Permit No. MD0001201 included in Attachment 3 notes the following outfalls: 014, proposed 022, a proposed unnamed outfall from a future stormwater pond, 012, 013, 021, 001, 016, 017, 059, 065, 069, and 071.

II. Facility Activity

During the inspection, the EPA Inspection Team observed: the graving dock, air stripper/carbon filtration water treatment system, Outfall 023, Outfall 022 (unpermitted), Outfall 025 (unpermitted),an unnamed outfall near Outfall 022/025 (unpermitted), a new outfall in a newly paved lot, Outfall 026, Outfall 027, and Outfall 028, scrap metal yard (northern portion of facility), Outfall 013, and areas related to permit No. MD0001201 (warehouse area/historic wastewater treatment plant), and the collection system to Baltimore County Sanitary Sewer System. The inspection observations were made pursuant to the requirements of the Permit. The observations from the inspection are described in detail below in the Observations section. Photographs were taken during the inspection by Amrita Gupta and are provided in Attachment 1.

III. Observations

Permit Conditions

According to the MD0001180 Permit Transfer Title Page (Attachment 2), "the Department authorizes US Wind Inc. to discharge from a shipyard for berthing pier usage, and shipping & receiving of cargo, for occasional ship repairs and a graving dock with underdrain dewatering, located at 6600 Shipyard Road, Baltimore, MD 21219 via outfalls 023 and 026 – 028 as identified and described below and from facility areas identified in the Stormwater Pollution Prevention Plan (SWPPP) referenced herein"

Part III, Section C. 2. c of the MDR003791 (20SW) Permit (Attachment 6) states the SWPPP must include a site map showing:

"i.) the size of the property in acres;
ii.) the location and extent of significant structures and impervious surfaces
iii.) the location and extent for planned restoration of impervious surfaces, or other nutrient reduction control measures;
iv.) directions of stormwater flow (use arrows);
v.) locations of all existing structural control measures or BMPs;
vi.) locations of all receiving waters in the immediate vicinity of your facility, indicating if any of the waters are impaired and, if so, whether the waters have TMDLs established for them;
vii.) locations of all stormwater conveyances including ditches, pipes, and swales;
viii.) locations of potential pollutant sources identified under Part III.C.3;
ix.) locations where significant spills or leaks identified under Part III.C.3 have occurred;
x.) locations of all stormwater monitoring points;
xi.) locations of stormwater inlets and outfalls, with a unique identification code for each outfall (e.g., Outfall No. 1, No. 2, etc), indicating if you are treating one or more outfalls as substantially identical, and an approximate outline of the areas draining to each outfall;
xii.) municipal separate storm sewer systems, where your stormwater discharges to them;
xiii.) locations and descriptions of all non-stormwater discharges identified under Part I.E.3;
xiv.) locations of the following activities where such activities are exposed to precipitation:

- fueling stations;
- vehicle and equipment maintenance and/or cleaning areas;
- loading/unloading areas;
- locations used for the treatment, storage, or disposal of wastes;
- liquid storage tanks;
- processing and storage areas;
- immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility;

- transfer areas for substances in bulk; and
- machinery;
- manufacturing buildings and

xv.) locations and sources of run-on to your site from adjacent property that contains significant quantities of pollutants."

Observation 1: Additional outfalls may not be permitted to discharge at 6600 Shipyard Road, Baltimore, MD 21219. Facility representatives stated that there are additional historical outfalls surrounding the graving dock that were utilized for draining water out of the graving dock. For example, facility representatives stated that an Outfall 022 and 025 are adjacent to permitted Outfalls 026 – 028 (Photo R0010157 - R0010158,20240925_142857304_iOS) however Outfalls 022 and 025 are not noted in the facility's MD0001180 permit (Attachment 2) or permit transfer cover page (Attachment 2). In addition, there appears to be two more unnamed outfalls (Photo R0010165, 20240925_142857304_iOS), it is unclear if these outfalls serve the same purpose as Outfall 022 and 025. Facility representatives stated that the additional outfalls should be stormwater only receiving outfalls similar to Outfalls 026 – 028 and connect to drop inlets (R0010166) around the property. Facility representatives were unclear which inlets or how many inlets the outfalls connect to. Permit No. MD0001180 states that some outfalls such as Outfall 023, 026 – 028 are permitted and therefore labeled in the SWPPP map. However, the additional outfalls and all inlets were not labeled in the facility's 2024 SWPPP map (Attachment 8). In addition, the general site map and general facility map provided appear to be missing the following required portions of a SWPPP map including,

- Direction of stormwater flow;
- Stormwater monitoring points;
- Size of property (in acres);
- Locations of all stormwater conveyances;
- Locations of all structural control measures (BMPs);
- Processing and storage areas (e.g. air stripping/carbon filtration treatment system; and
- Locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants.

Permit Conditions

Permit No. MD0001201 Part I, Section AG ("Stormwater Discharges associated with Industrial Activity") states, "Stormwater pollution prevention at the site (see below) shall address all stormwater associated with industrial activity at the site, including, but not limited to, stormwater discharges via the outfalls authorized under this permit." Part I, Section AG.1 "Control Measures" states, "You must divert, infiltrate, reuse, contain, or otherwise reduce stormwater runoff to minimize pollutants in your discharges."

Permit No. MD0001201 Part I, Section AG.3.b.iii ("Site Map") requires that a map shall be included in the SWPPP showing "locations of stormwater inlets and outfalls with unique identification code for each outfall (e.g., Outfall No. 1, No. 2, etc) indicating if you are treating one or more outfalls as substantially identical, and an approximate outline of the areas draining to each outfall;".

Observation 2: The EPA Inspection Team reviewed the facility's 2023 SWPPP provided on 12/4/2024. Although a map is provided, it does not display the inlets or outfalls within the permitted area.

Observation 3: A drop inlet was observed without proper inlet protection (Photo R0010191). In addition, there appeared to be several metal plated coverings surrounding the facility. Facility representatives stated these were historic utility areas (Photos R0010198, R0010188, R0010187, R0010186, R0010174). Facility representatives stated that stormwater contacting this area will discharge into Outfall 013 of Permit No. MD0001201.

Permit Condition

Permit No. MD0001201 Part I, Section AG.1.b.ix ("Non-Stormwater Discharges") states, "You must eliminate any non-stormwater discharges from your facility not authorized by this permit or another NPDES or State discharge permit."

Observation 4: During the inspection, the EPA Inspection Team discovered various scattered metal parts and piles of debris. Facility representatives stated that this was likely from a demolition of a previous structure within the area. The area did not appear to contain any BMPs surrounding the debris (Photos R0010193 – R0010197). The facility did provide photos on 11/12/2024 to confirm that the debris has been removed from the area. A document providing additional supplemental information from the facility is in Attachment 9.

Permit Condition

Permit No. MDR003791 Part III.B.1.b(i) ("Minimize Exposure") states, "You must minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings (although significant enlargement of impervious surface area is not recommended). You must store solid chemical products, chemical solutions, paints, oils, solvents, acids, caustic solutions and waste materials under cover on an impervious surface. In minimizing exposure, you should pay particular attention to the following:

- use grading, berming, or curbing to prevent runoff of contaminated flows and divert run on away from these areas;
- locate materials, equipment, and activities so that leaks are contained in existing containment and diversion systems (confine the storage of leaky or leak-prone vehicles and equipment awaiting maintenance to protected areas);
- clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants;
- use drip pans and absorbents under or around leaky vehicles and equipment or store indoors where feasible;
- use spill/overflow protection equipment;
- drain fluids from equipment and vehicles prior to onsite storage or disposal;
- perform all cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray; and
- ensure that all wash water drains to a proper collection system (i.e., not the stormwater drainage system)."

Observation 5: The EPA Inspection Team noted several drums on pervious surfaces that were unlabeled and not in secondary containment (Photos R0010199, R0010204, R0010205). Attachment 9 notes supplemental information the facility representatives provided on 11/12/2024. The supplemental information confirms that the drums are labeled to be "non-hazardous" in the case of a spill. It is unclear as to the actual contents of the drums. The drums are still located outside on a pervious surface without secondary containment.

Permit Condition

Permit No. MDR003099 states, Part III.B.1.b.i ("Minimize Exposure") states, "You must minimize the exposure of manufacturing, processing, and material storage areas…."

Observation 6: The EPA Inspection Team observed that the scrap metal yard appeared to scatter debris and large dark staining surrounding the pile (Photos R0010180 – R0010184). The facility did create a berm alongside numerous jersey barriers to contain potential contact runoff from the pile into the river. However, there appeared to be gaps in some areas and it is unclear if the berm is utilizing non-contaminated sediment. The facility has submitted photos filling in gaps to the berms in its supplemental information submitted on 11/12/2024 (Attachment 9).

Permit Condition

Part I. of the Industrial User Permit No. 1711 to Balitmore County Sanitary Sewer System displays a picture of the sampling point (Outfall 001).

Observation 7: The EPA Inspection Team observed the pump station and sampling point to the Baltimore County Sanitary Sewer System (Photos R0010170, R0010175 – R0010178). The sampling point manholes appeared to be unmaintained as there was a large amount of vegetation covering access to both manholes (R0010175, R0010177). It is unclear how often facility representatives inspect the collection system to check on issues such as inflow and infiltration. In addition, a manhole appears to contain a gap where inflow/infiltration could enter the sanitary system (R0010190).

Permit Condition

Permit No. MD0001180 Part II.A.2 ("Reporting-Monitoring Results Submitted Quarterly") states, "Monitoring results obtained during each calendar quarter shall be summarized and submitted electronically using NetDMR. For each effluent characteristic monitored at a frequency of less than once per month the results obtained during the reporting period shall be summarized on a single report for each quarter. More frequently monitored effluent characteristics and effluent characteristics limited as a monthly average shall be reported on a separate report for each calendar month of the reporting period. Results shall be submitted to the Department via NetDMR no later than the 28th of the month following the end of the reporting period. Specific requirements regarding submittal of data and reports using NetDMR are described below…"

Observation 8: The EPA Inspection Team did a thorough review of analytical results following the inspection. For Permit No. MD0001180, there have been no effluent limit violations. However, there were two DMR Non-Receipt on 2/28/2023 and 3/31/2023 for free Cyanide as also displayed in Table 3. On 11/12/2024, Facility representatives provided an MDE inspection report dated 08/09/2024. This August inspection report explains that the below violations are due to free Cyanide not having limits until the 37th month of issuance as stated under "Special Conditions A.1 3.". In the August inspection report, facility representatives stated that NetDMR did not accept a submission without applying limits, therefore the facility has posted results of this in the notes section. The full state inspection report can be reviewed in Attachment 10.

Table 3: NPDES Permit No. MD0001180 DMR Non-Receipt Violations

Outfall #	Monitoring Period End Date	Parameter Name	DMR Value	Permit Limit	Units	Limit Type	Violation Severity
23	2/28/2023	Cyanide ,free [amenable to chlorination]	Conditional Monitoring –	0.001	mg/L	DAILY MX	DMR Non-Receipt

Outfall #	Monitoring Period End Date	Parameter Name	DMR Value	Permit Limit	Units	Limit Type	Violation Severity
			Not required this Period				
23	3/31/2023	Cyanide ,free [amenable to chlorination]	Conditional Monitoring – Not required this Period 6	0.001	mg/L	DAILY MX	DMR Non-Receipt

Permit Condition

Permit No. MD0001180 Part II.A.2 ("Reporting-Monitoring Results Submitted Quarterly" states,

> "Monitoring results obtained during each calendar month shall be summarized and submitted electronically using NetDMR… Results shall be submitted to the Department via NetDMR no later than the 28th of the month following the end of the reporting month. Specific requirements regarding submittal of data and reports using NetDMR are described below…"

Observation 9: The EPA Inspection Team utilized EPA's Enforcement and Compliance History Online ("ECHO") webpage to identify 542 DMR Non-Receipt Violations from the monitoring period of 02/28/2023 – 06/30/2024. Attachment 11 lists the DMR Non-Receipt violations within four total outfalls: Outfall 006, Outfall 008, Outfall 014, and Outfall 021. It is unclear why no data has been submitted into NetDMR.

Permit Condition

Permit No. MD0001201 Part I.A.8 states that "…the permittee shall monitor for the following pollutants at the downstream end of the Tin Mill anal prior to discharge into the Humphries Creek WWTP…"

Permit No. MD0001201 Part I.B.1 states, "This permit establishes action levels applicable to the regulated discharge from this site. Action levels are not effluent limitations; an action level exceedance, therefore, is not a permit violation. Action level monitoring data is primarily for the permittee's use to determine the overall effectiveness of control measures and to indicate when additional actions may be necessary."

Observation 10:

Attachment 11 displays data from EPA's ECHO webpage indicating that the facility exceeded its Total Zinc action level during the monitoring period ending 4/30/2023 as part of the monitoring requirements of "Special Condition – A.8" in NPDES Permit #: MD0001201.

Permit Condition

The "Impairments" section of Permit No. MDR003099 state, "Your facility discharges into a watershed which is impaired for the following categories:

- Biological
- Nutrients
- PCBs
- Pesticides
- Sediments

Based on this status you must evaluate your control measures to ensure you are minimizing your facility discharges relating to these impairments during each annual comprehensive site compliance evaluation."

The "Impaired Water Monitoring" section of the Permit No. MDR003099 acceptance letter dated March 11th, 2024 states that, "Per Part III.B.2. you are required to monitor the following pollutants following the procedures set in Part V.B.3"

Parameter	Benchmark	Units	Frequency	Sample Type
Total Zinc	Report	mg/L	1/year	Grab

Parameter	Benchmark	Units	Frequency	Sample Type
TSS	Report	mg/L	1/year	Grab

Observation 11:

The EPA Inspection Team attempted to review analytical data for the Permit No. MDR003099, however no data has been submitted in the last five years according to EPA's Integrated Compliance Information System (ICIS).

Observation 12:

In addition, it is unclear if the facility is performing annual comprehensive site evaluations and updating control measures based on the impairments listed above.

IV. Records Review

EPA requested copies of the following on November 27, 2024:

- Copies of all permit registration letters and permits documents related to the Clean Water Act (including IU permit discharging to Baltimore County Sanitary Sewer System)
- Chemicals utilized on dry dock and surrounding the dry dock
- Most recent SWPPP (for permits that require it) & most recent associated annual training record
- Most updated map of facility noting all active outfalls

Additional information was sent on 11/12/24, this includes photographs of the following:

1. Scrap operation berm – Repaired / re-leveled top of berm
2. Re-labeled drums
3. Area south of the building pad – Debris, stockpiles, and scrap metal removed
4. Maryland Department of the Environment's August 2024 site inspection

All of the above documents were sent to the EPA Inspection Team and received on December 4th and December 5th, 2024. EPA reviewed all information provided by the facility and noted information updates based on the documentation within this report.

A copy of each permit is included within the report's listed attachments. A list of the attachment numbers is available in page 14 of this report.

V. Closing Conference

After the facility walk, the EPA Inspection Team met with the facility representatives for a closing conference. The EPA Inspection Team shared preliminary observations with the facility. The EPA Inspection Team reiterated to the facility representatives that all preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared were subject to further investigation by EPA upon the additional review of records and documentation. Additional observations may be contained in this inspection report that were not identified at the time of the closing conference after EPA reviewed additional materials following the inspection.

The inspection concluded at 1:00PM.

VI. List of Attachments

Attachment 1:	Photo Log
Attachment 2:	Permit No. MD0001180
Attachment 3:	Permit No. MD0001201
Attachment 4:	Baltimore County Industrial User Permit No. 1711
Attachment 5:	Permit No. MDR003099
Attachment 6:	Permit No. MDR003791
Attachment 7:	SWPPP (MDR003099)
Attachment 8:	SWPPP (MDR003791)
Attachment 9:	Supplemental Information from Tradepoint Atlantic submitted to EPA on 11/12/2024
Attachment 10:	August 9, 2024 MDE Inspection Report
Attachment 11:	MD0001201 DMR Violations from ICIS