UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION 2
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION
MULTIMEDIA PERMITS AND COMPLIANCE BRANCH

NPDES Stormwater Inspection
Industrial Site

Owner/Operator

CHITOLIE TRUCKING SERVICE, LLC
P.O. Box 2738, Kingshill,
St. Croix, USVI 00851

Facility

No. 2&4 Casava Gardens, Christiansted, St. Croix, VI 00820
Latitude: 17° 43´ 11.00˝ N; Longitude: 64° 44´ 34.41˝ W
Telephone Number: 340-772-7000
Email: chitolietrucking@yahoo.com

Sections 301(a), 308(a) and 402 of the Clean Water Act
NPDES Regulations: 40 C.F.R. § 122

TPDES Tracking Number: VIU002547(ICIS)
Receiving Water: Fig Tree Ghut and Cane Garden Bay (Caribbean Sea)

Inspection Date: March 30, 2023

Participating Personnel:

U.S. EPA:	Jim C. Casey, Senior Environmental Engineer Clean Water Act Team
DPNR:	Antonio Farchette, Environmental Specialist Water Pollution Control Program Tel.: (340) 718-9749 Email: Antonio.Farchette@dpnr.vi.gov
CHITOLIE:	Uriah Chitolie, Operations Manager Tel: (340) 332-9872 Email: chitolietrucking@yahoo.com
	Allan Chitolie, Owner Tel: (340) 772-7000 Email: chitolietrucking@yahoo.com

Inspection Report Prepared by:

JIM CASEY Digitally signed by JIM CASEY
Date: 2023.05.11 09:39:46 -04'00'

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Jim C. Casey — Date
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Inspection Report Approving Officer:

Rivera, Jose Digitally signed by Rivera, Jose
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José A. Rivera, BSCE — Date
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1. BACKGROUND

Chitolie Trucking Service, LLC ("Chitolie") is a trucking service provider conducting a variety delivery and/or removal of materials operations ranging from fuel delivery to removal of debris from construction sites throughout the District of St. Croix, United States Virgin Islands ("USVI"). Chitolie's facility is located at No. 2&4 Casava Gardens, Christiansted, St. Croix, VI 00802 (the "Facility'). An aerial photograph of the Facility[1,2] is featured as **Figure 1** (below) of this Inspection Report.

Figure 1
Chitolie Trucking Service, Christiansted, St. Croix, VI

On November 2, 2022, Jim C. Casey (the "EPA Inspector") of the United States Environmental Protection Agency ("EPA" or "Agency"), Region 2, and Mr. Courtney Dickenson, Environmental Engineer of the Virgin Islands Department of Planning and Natural Resources ("DPNR" or the "Department") (together, the "Inspectors"), performed a joint-agency National Pollutant Discharge Elimination System ("NPDES") Stormwater Reconnaissance Inspection ("SWI" or "2022 Inspection")[3] at the Facility. The general purpose of the 2022 Inspection was to evaluate the types and scope of industrial operations occuring at the Facility, to identify process wastewater streams generated, the

1 This assigned ICIS tracking number remains a valid for compliance monitoring related to the Facility at the above referenced address until Territorial Pollutant Discharge Elimination System ("TPDES") permit coverage is issued by DPNR.
2 Chitolie's Facility, 2 & 4 Casava, St. Croix, USVI (Google Earth Pro™ Imagery, dated March 29, 2020).
3 This was an EPA led Inspection.

treatment and discharge of these waste streams. In addition, to determine whether Chitolie discharges storm water associated with industrial activities from the Facility and are subject to the regulations implementing the Clean Water Act ("CWA" or "Act"), as amended.

The EPA Inspector made observations and findings during the 2022 Inspection, including that:

a. Besides its traditional trucking operation (described above), Chitolie is also a ready-mixed concrete product provider in the District of St. Croix. The company operates a ready-mixed concrete batch plant ("RMCP"), which was in active production at the time of the 2023 Inspection.

b. Operations at the Facility were not in accordance with Best Management Practices ("BMPs") for prevention and control of discharges of pollutants through storm water runoff flows associated with industrial activity.

c. Through a November 15, 2022 e-mail correspondence (featured as **ATTACHMENT 1** of this 2023 Inspection Report), the EPA Inspector requested information from the management of Chitolie, and received a response from Mr. Dion Alibocas, Manager of Chitolie Concrete Operations through e-mail correspondences submitted during the period of November 17-18, 2022. Review of the November 17-18, 2022 response from Chitolie revealed the following:

    i. Chitolie had not submitted an NPDES application, including a signed and dated Notice of Intent and Storm Water Pollution Prevention Plan to the attention of DPNR to secure coverage under an appropriate Territorial Pollutant Discharge Elimination System ("TPDES") Permit[4] for its Facility.

    ii. Confirmed that, at the time of the 2022 Inspection, principals of Chitolie in the USVI were Mr. Allan Chitolie, Owner, Mr. Uriah Chitolie, Trucking Operations Manager, and Mr. Dion Alibocas, Concrete Operations Manager.

    iii. The Facility started its ready-mixed concrete manufacturing operation approximately in November 2021.

The results the 2022 Inspection were summarized in an Inspection Report ("the 2022 Inspection Report")[5] which was issued to Chitolie and is featured as **ATTACHMENT 2** of this 2023 Inspection Report.

On March 30, 2023, Mr. Casey (the "EPA Inspector") and Mr. Antonio Farchette (the "DPNR Inspector"), together as "the Inspectors", performed a follow-up Federal-lead, joint-agency NPDES SWI (the "2023 Inspection") at the Facility to evaluate the entity's

4 TPDES permit represents the types of permits (Individual and General permits) that DPNR is allowed to issue pursuant to the applicable regulations implementing the WPCA.

5The findings of 2022 Inspection were summarized in the 2022 Inspection Report, dated July 12, 2022. A copy of the Inspection Report was transmitted to VIDPNR on or about July 13, 2022.

compliance with the regulations implementing the CWA, the Water Pollution Control Act ("WPCA"), and the appropriate Permit. The purpose of the 2023 Inspection was to carry-out the following actions since after the 2022 Inspection, and follow-up correspondences between Chitolie and EPA. More specifically to:

a. evaluate storm water runoff flow pattern within, and the discharge of storm water associated with identified industrial activities being conducted at Facility;

b. evaluate all current industrial operations and practices being conducted at the Facility that leads to generation of process wastewater streams;

c. evaluate the management, treatment, and discharge of pollutants in the form of treated process wastewaters and stormwater associated with (any identified) industrial activity that are being discharged from the Site directly into nearby waterbodies or through a storm water drainage system; and

d. determine whether Chitolie had effectively taken appropriate actions towards securing an appropriate TPDES permit from DPNR, being authorized to discharge pollutants from the Facility into a water of the USVI and water of the United States ("US").

The 2023 Inspection was performed pursuant to the inspection authority under Section 308(a) of the CWA.

This Inspection Report (the "2023 Inspection Report") entails discussion of observations and findings, comments, and areas of concern regarding conditions that existed at the Facility at the time the 2023 Inspection was conducted. Also included in this 2023 Inspection Report are the EPA Inspector's evaluation of instituted functional provisions of BMPs for control of and prevention of discharges of pollutants through storm water runoff flows leaving the Facility and entering the Fig Tree Ghut storm water drainage system (immediately downstream) and that eventually drains into Cane Garden Bay (the "Caribbean Sea").

2. GENERAL INFORMATION ABOUT THE 2023 INSPECTION ACTIVITIES

The dates and times during which activities of the 2023 Inspection were conducted, and related weather conditions are summarized in **Table 1** (on the next page).

3. GENERAL INFORMATION ABOUT FACILITY AND BUSINESS OPERATIONS

The industrial activities that are conducted by Chitolie at its St. Croix location are characterized as the company's "primary industrial zone" in the USVI, which include:

a. An area along the northwest and western borders of the Facility where the company's fleet of trucks are staged in preparation to be dispatched to client locations, and for parking at the close of business daily. According to Mr. Uriah Chitolie, the company continues to feature up to seven (7) trucks in operation in its trucking operations.

Table 1

Dates of Facility Visits	Inspection Activity	Time Started & Ended	Weather Condition
3-30-2023	**Entrance Interview On-Site – The Inspectors entered the Facility and requested to speak with Mr. Uriah Chitolie, General Manager, who was available. Mr. Uriah Chitolie advised the Inspectors that Mr. Dion Alibocas was no longer in any management capacity with Chitolie. The EPA Inspector stated the purpose for their presence and the EPA Inspector presented his EPA-issued Inspector Credentials.**	**9:30 am**	**Dry, clear skies, sunny, (mid-morning)**
	End of Entrance Interview.		
	The EPA Inspector requested access to the Facility records associated with activities that are conducted on-site, including efforts implemented to come into compliance the CWA. As was the case during the 2022 Inspection, the requested records were not readily available on-site.	**10:00 am**	
	The EPA Inspector requested a copy of the most recent representative Site Plan for the Facility to facilitate the walkthrough. A Site Plan was not readily available. The Inspectors began the walkthrough in the vicinity of the northeast corner of the Facility, and evaluated all operations observed while on-site.	**10:10 am**	
	End of walkthrough.		
	The EPA Inspector conducted an Exit Meeting in Facility's Administrative Office Building with Mr. Uriah Chitolie.	**11:15 am**	
	Ended Exit Meeting. The EPA Inspector left Facility premises.		
	Exited Facility	**11:30 am**	

b. The ready-mix concrete batch plant continues to be in product manufacturing operation daily according to Chitolie. That operation includes staged large quantities of aggregate (construction grade sands and gravel), stored bulk-bags of cement, and several totes of chemical additives, all situated in the central section of the Facility. As was identified during the 2022 Inspection, the company's support operations include:

   i. A large maintenance shop in which multiple vehicles and heavy equipment can be serviced at a given time. The maintenance shop is situated along the southern border.

   ii. A fueling terminal for servicing the company's fleet of vehicles and heavy

equipment.

c. An administrative office and control room for the manufacturing operations.

d. Storage of bulk quantities of lubricants and waste oils.

e. Administrative offices and an employee parking lot.

The business operations of the Facility are best described by the primary Standard Industrial Classification ("SIC") Code 3273 (Ready-Mixed Concrete) and a secondary code of 4212 (Local Trucking Without Storage)[6].

4. GENERAL INFORMATION ABOUT CHITOLIE'S OWNERS

Chitolie is a corporation authorized to do business in the USVI. The relevant principals of the corporation identified at the time of the 2023 Inspection were Mr. Allan Chitolie, Owner, and Uriah Chitolie, Operations Manager. According to Uriah Chitolie Mr. Dion Alibocas, who was identified as General Manager at the time of the 2022 Inspection was no longer in management capacity at Chitolie, and that he has assumed the responsibility vacated.

5. APPLICABLE REGULATIONS AND PERMITS

Discharges of Industrial Waste Streams into Waters of the United States

Section 301(a) of the CWA, 33 U.S.C. § 1311(a), provides in part that "[e]xcept as in compliance with [CWA § 402], the discharge of any pollutant by any person shall be unlawful." Pursuant to the NPDES regulation at 40 C.F.R. § 122.1(b), a NPDES permit is required for the discharge of any pollutant from any point source into waters of the United States. Section 402(a)(1) of the Act, 33 U.S.C. § 1342(a)(1), provides that "the Administrator may, after opportunity for public hearing, issue a permit for the discharge of any pollutant…. upon condition that such discharge will meet…. such requirements as the Administrator determines are necessary to carry out the provisions of the [CWA]."

The USVI statute at 12 V.I.C. § 185(a), states in part, that except as provided in this chapter and any rule and regulations promulgated hereto, the discharge of pollutants into waters of the USVI by any person, shall be unlawful.

Discharges of Storm Water Associated with Industrial Activity into Waters of the United States

Section 402(p)(2)(B) of the CWA authorizes the Administrator of EPA to issue NPDES

[6] Refer to 40 C.F.R. § 122.26(b)(14)(viii) for transportation facilities classified as Standard Industrial Classifications 40, 41, 42 (except 4221-25), 43, 44, 45, and 5171, which have vehicle maintenance shops, equipment cleaning operations, ect.

permits to storm water discharges associated with industrial activity. EPA promulgated NPDES regulations defining the term storm water associated with industrial activity. Those regulations are codified in 40 C.F.R. § 122.26(b). The industrial activity classified under SIC Codes 3273 (Ready-Mixed Concrete) and 4212 (Local Trucking Without Storage) are included in the definition of storm water discharges associated with industrial activity. See 40 C.F.R. §§ 122.26(b)(14)(ii) and (viii), respectively.

On June 20, 2007, DPNR promulgated regulations pursuant to USVI Statute at 12 V.I.C. Chapter 7, Subchapter 184-45, which require owners/operators of facilities with storm water discharges associated with industrial activities to apply for and obtain coverage under an appropriate TPDES permit.

Evidence obtained during the 2023 Inspection revealed that both dry-weather wastewater streams and storm water discharges associated with the Ready-Mixed Concrete and a Local Trucking Service operations at the Facility confirmed that Chitolie is subject to Sections 301(a) and 402(p) of the CWA, 33 U.S.C. §§ 1311(a) and 1342(p), codified at 40 C.F.R. §§ 122.21 and 122.26(e), and USVI's Statute at 12 V.I.C. Chapter 7, Subchapter 184-45, and therefore, is required to apply for and secure appropriate TPDES permit coverage to be authorized to discharge pollutants into a water of the US and water of the USVI.

TPDES Permitting

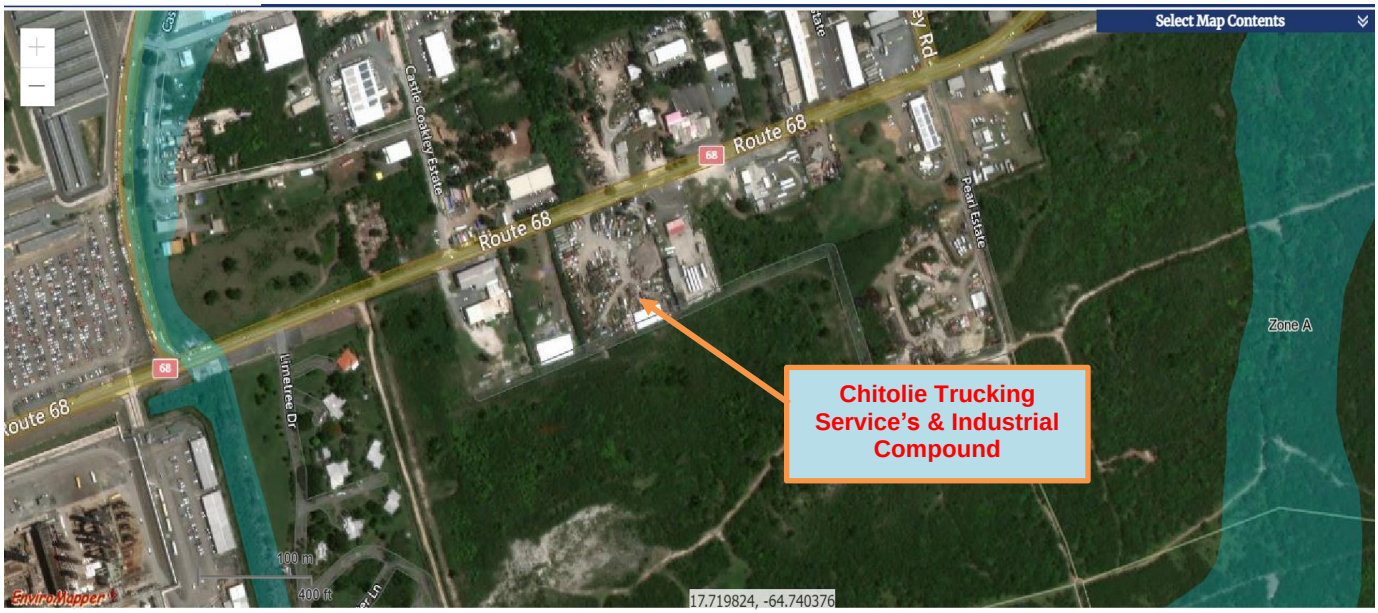
DPNR issued the TPDES Multi-Sector General Permit ("MSGP") pursuant to Subsection 184-46(a)(2)(i) of the TPDES regulations. The MSGP became effective on January 1, 2012 and expired on December 31, 2016. Since then, the MSGP was reissued on March 1, 2017 ("2017 MSGP" or the "Permit"), which expired on February 28, 2022. The MSGP has not been re-issued.

6. GENERAL INFORMATION ABOUT THE RECEIVING WATERS

The Facility is situated in an industrial zone along the south-central coastal region of St. Croix watershed that drains into the Cane Garden Bay (Caribbean Sea). An aerial view of location of the Facility and immediate surroundings are depicted in satellite imagery of the reference watershed area featured in **Figure 2**, (Source: https://nepassisttool.epa.gov/nepassist/nepamap.aspx) on the next page.

Figure 2

Chitolie Trucking Service's Facility situated within the south-central section of the St. Croix Watershed



7. PRE – 2023 INSPECTION FILES REVIEW

On March 24, 2023, the EPA Inspector conducted a review of documents in the case file for Chitolie maintained at EPA's office in the USVI and searched EPA's Integrated Compliance Information System ("ICIS") and the Enforcement and Compliance History Online ("ECHO") databases to determine the TPDES permitting status, and recent compliance history, respectively.

These records review revealed the following, among others, that:

a. As was determined during the 2022 Inspection, at the present, Chitolie continues to conduct multiple industrial operations at its Facility that has led to the generation of dry-weather wastewater streams and releases of such wastes off-site. In addition, there is discharge of pollutants through storm water associated with the industrial activity from the Facility and into the surrounding environment.

b. The Facility was last inspected by EPA and DPNR through a documented joint-agency SWI on November 2, 2022.

8. ENTRY, REVIEW OF RECORDS, AND WALKTHROUGH IN THE FACILITY

a. Entry into the Facility

On March 30, 2023, the Inspectors entered the Facility at approximately 9:30 a.m., and initially met with Mr. Uriah Chitolie in the Facility's employee parking lot, then were invited to proceed to the company's administrative office by Mr. Chitolie. The EPA Inspector established the purpose for their presence onsite and presented his EPA-issued Inspector Credentials.

The EPA Inspector was informed by Mr. Chitolie that the company had experienced a loss of personnel leading to a reduction of their workforce; however, the company has maintained its ready-mix concrete production at the level as was occurring at the time of the 2022 Inspection.

b. Review of records maintained on-site at time of the 2023 Inspection

Immediately following the entry meeting, the EPA Inspector requested that Mr. Chitolie provide access to documents associated with Chitolie's implementation of corrective actions had carried out to come into compliance with the CWA, WPCA and their implementing regulations, and which are maintained at the Facility (as was referenced in the company's November 17-18, 2022 response to EPA's November 15, 2022 e-mail correspondence), including among other records:

i. a prepared Stormwater Drainage Site Plan for the Facility;

ii. copies of aerial photographs of the Facility reflecting physical changes that have occurred and documented by the company; and

iii. copy of an application seeking an appropriate TPDES permit by Chitolie to DPNR.

Mr. Chitolie could not readily provide the Inspectors access to any relevant documents or other records associated with the above referenced efforts carried out by Chitolie.

Considering the immediate unavailability of the requested relevant records that were maintained on-site, the intended review of records by the EPA Inspector for this 2023 Inspection could not be carried out.

c. Conduct of the walkthrough of the Facility

The Inspectors began the walkthrough in the northeastern section of the Facility accompanied by Mr. Chitolie. The EPA Inspector evaluated the following sections and operations being conducted at the Facility and made observations and preliminary findings as described below. These observations and preliminary findings were also documented through pictures, which are featured in **ATTACHMENT 3** – **CHITOLIE'S March 30, 2023 NPDES SWI Photo Album**.

i. Vicinity of the Ready-Mixed Concrete Operation

1. ***Potential for Transport of Sediment from Accumulated Residues on Materials Loading Ramp of the Ready-mixed Concrete Plant*** – Observed an accumulation of raw materials (sand, gravel, and cement) on the loading ramp, which is situated where the accumulated material residues on and off the loading ramp are in the flow path of storm water draining resulting in wash-off the residual materials off-site. See **IMGs 1571 and 6838 of CHITOLIE'S March 30, 2023 NPDES SWI Photo Album, ATTACHMENT 3,** of the 2023 Inspection Report.

2. ***Discharge of Pollutants from Ready-Mixed Concrete Residues Spills in the Product Loading Bay*** – Observed residue of ready-mixed concrete and wastewater that flow through the product loading bay and that drains-off beyond a concrete berm, and eventually into the nearby road. See **IMGs 6690, 2419 and 6311 of CHITOLIE'S March 30, 2023 NPDES SWI Photo Album, ATTACHMENT 3,** of the 2023 Inspection Report.

3. ***Dry-weather flow discharged out of the Facility –*** Observed evidence a dry-weather flow of wastewater from the retention pond was occurring at the time of the walkthrough, which flowed out of the Facility, and into the public road. See **IMGs 6690 and 2968 of CHITOLIE'S March 30, 2023 NPDES SWI Photo Album, ATTACHMENT 3,** of the 2023 Inspection.

ii. Vicinity of the Maintenance Shed

1. ***Failure to Minimize the Potential for Release of Spilled Used-oil*** – As was observed at the time of the 2022 Inspection, similar concerns were observed on this occasion regarding a large metal tank in which Chitolie stores used oil generated from maintenance servicing of its fleet of trucks, other vehicles, and heavy equipments. The used oil storage tank was still not within a containment. In addition, the EPA Inspector observed that the tank was situated in different location on this occasion of the Facility, and that, the ground area around the tank appeared heavily saturated from spilled oil residues.

2. ***Failure to Minimize the Potential for Release of Improper Stored Auto-Engine Fluids*** – Observed several smaller containers (5-gallons plastic buckets, metal drums and drip-pans) with what appeared to be spent solvents, spent hydraulic or other fluids generated during maintenance of vehicles and heavy equipments. The containers were staged in an area in front of the maintenance shed and close to the southeastern corner of the Facility.

   Failure to situate the containers of wastes described in sub-paragraphs c.ii.*1* and *2*, immediately above within an appropriate containment, increases the potential for releases of the pollutants in the event of accidental spills caused by traffic in and out of the shed. This concern is supported by **IMGs 0229, 5353, 0136, 1437 and 5926 of CHITOLIE'S March 30, 2023 NPDES SWI Photo**

Album, ATTACHMENT 3, of the 2023 Inspection Report.

3. ***Improper management of regulated hazardous wastes*** – As was observed during the 2022 Inspection, similarly, on this occasion of the 2023 Inspection, the EPA Inspector observed an accumulation of spent automobile batteries staged on the floor of the maintenance shed where the Facility's vehicle fleet and heavy equipments are serviced. Some of the spent batteries were situated in a manner that could be impacted by traffic in and out of the maintenance stalls, leading to accidently releases of waste from impacted battery units. See **IMG 3264 of CHITOLIE'S March 30, 2023 NPDES SWI Photo Album, ATTACHMENT 3,** of the 2023 Inspection Report.

4. ***Improper disposal of potentially regulated wastes*** – Observed oily-soaked rags, gloves, and paint residues mixed with generated refuse and discarded into a 55-gallon metal drums staged just outside of the maintenance shed. According to Mr. Chitolie, wastes collected in the metal drums in question are disposal as regular garbage. See **IMG 8603 of CHITOLIE'S March 30, 2023 NPDES SWI Photo Album, ATTACHMENT 3,** of the 2023 Inspection Report.

iii. <u>Identified Stormwater Flow Paths through the Facility</u>

1. ***Improper housekeeping practices at the Facility*** – Observed spilled residues of used oil, other engine fluids and wastes on the ground in various locations generally along the identified stormwater flow patterns through the compound. Absence of lack of general BMPs for proper housekeeping at the Facility. This general concern is supported by conditions captured in **IMGs 0136, 5926 and 6838 of CHITOLIE'S March 30, 2023 NPDES SWI Photo Album, ATTACHMENT 3,** of the 2023 Inspection Report.

2. ***Dry-weather flow discharged out of the Facility –*** Dry-weather flow event of wastewater from the retention pond was occurring at the time of the walkthrough, which flowed out of the Facility, and into the public road. See **IMGs 0136, 5926 and 6838 of CHITOLIE'S March 30, 2023 NPDES SWI Photo Album, ATTACHMENT 3,** of the 2023 Inspection Report.

d. **Conveyances through which Chitolie Discharged Storm Water Associated with Industrial Activity**

During the 2023 Inspection, evidence observed revealed confirmation that the entrances/exits situated along the northern border, serve as discrete points through which Chitolie discharges storm water associated with industrial activities from the Facility that flow along the left side of the public road drains into the Fig Tree Ghut located about 200 yards downhill, and which eventually discharges into Cane Garden Bay along the south-central coastline of St. Croix. The evidence for both outfalls revealed that:

- **Outfall 1** – Storm water runoff flow from areas around the administrative office building and the RMCP through the upper entrance/exit used to access the RMCP product loading bay. Outfall 1 is featured in **IMG 6607 in Part B of CHITOLIE'S March 30, 2023 NPDES SWI Photo Album, ATTACHMENT 3,** of the 2023 Inspection Report.

- **Outfall 2** – Storm water runoff flow through the central section of Facility and through the lower entrance/exit. Also observed that a dry-weather discharge was occuring and draining towards the entrance/exit. Outfall 2 is featured in **IMG 3694 in Part B of CHITOLIE'S March 30, 2023 NPDES SWI Photo Album, ATTACHMENT 3,** of the 2023 Inspection Report.

Beside confirmation of the above-described storm water outfalls, the EPA Inspector observed evidence that a third discrete conveyance through which both process wastewater and storm water associated with industrial activity was identified. This newly identified discrete conveyance is situated approximately at a point along the northwest corner of the Facility shown in **Figure 1** of this 2023 Inspection Report. During the walkthrough, Mr. Chitolie indicated that he is aware that the discharge of pollutants from the Facility at point in question, designated as Outfall 3 for purpose of this 2023 Inspection Report, has occurred and continues.

- **Outfall 3** – Stormwater runoff flow from the central section of the through the chain-link fence along the northwestern corner boundary of the Facility. Outfall 3 is featured in **IMG 8205 in Part B of CHITOLIE'S March 30, 2023 NPDES SWI Photo Album, ATTACHMENT 3,** of the 2023 Inspection Report.

9. EXIT MEETING

At the conclusion of the walkthrough, the Inspectors met with Mr. Chitolie in the Facility's parking lot. The EPA Inspectors summarized their observations and findings made during the walkthrough of the 2023 Inspection and advised that the Agency would be issuing a formal written report reflecting all relevant concerns and observations made for the information of Chitolie's management, and its advisement of corrective actions required to come into compliance with the CWA, the WPCA, and their respective implementing regulations. The EPA Inspector also advised Mr. Chitolie that some of the records requested were not readily available for the Agency's review during the 2023 Inspection, in addition to other information determined as required for completion of the 2023 Inspection Report, may be requested by EPA through electronic correspondences following the date of the 2023 Inspection.

End of Report

ATTACHMENT 1 – EPA's November 15, 2022 request for documents identified during the 2022 Inspection for the Agency's review.

ATTACHMENT 2 – The 2022 Inspection Report

ATTACHMENT 3 – CHITOLIE'S March 30, 2023 NPDES SWI Photo Album

ATTACHMENT 1: EPA's November 15, 2022 request for documents identified during the 2022 Inspection for the Agency's review.

ATTACHMENT 2: The 2022 Inspection Report

ATTACHMENT 3: CHITOLIE'S March 30, 2023 NPDES SWI Photo Album

CHITOLIE TRUCKING SERVICE, LLC NPDES Stormwater Inspection (SWI) Photo Album; 3-30-2023 Walkthrough

A. Observations that revealed potential non-compliance with regulations implementing the CWA and TPDES Stormwater Rules during the 2023 Inspection Walkthrough

IMG 1571-Materials build-up on and off-loading ramp of the RMCP and in path of stormwater flow.

IMG 6838-Dry-weather flow from area of RMCP towards central area of Facility carrying pollutants.

IMG 6352-Dry-weather flow through central area of Facility.

IMG 9313-Continuation of dry-weather flow going into central section of the Facility, before draining to towards the lower entrance and into the road.

IMG 5839-Continuation of stormwater flow path through the central section of the Facility.

IMG 9755-Evidence of dry-weather flow draining to the lower entrance (Outfall 2) captured during the 2023 Inspection.

IMG 6346-Dry-weather flow draining from central Section and towards northwest corner of Facility.

IMG 6639-Dry-weather flow draining along the ground towards the northwestern corner of the Facility.

IMG 6958-Evidence that process wastewater flows from mid-section of Facility reaches the northwest corner.

IMG 8205-Point at the fence line in the northwest of Facility where wastewater stream is discharged off-site.

IMG 0229-Containers with engine fluids from auto and equipment maintenance on-site. Containers were exposed to all environmental conditions.

IMG 5353-Close-up of container with wastes and exposed to all environmental conditions.

IMG 0136-Close-up view of equipment repair occur -ing in the open. Spilled oil-based fluid onto ground.

IMG 1437-View of oil-based fluid removed from engines and equipments under maintenance on-site.

IMG 5926-View of Facility's used-oil storage tank. The ground beneath the tank appeared very saturated from used oil spilled.

IMG 3264-Collection of spent batteries staged at front of the maintenance shed.

IMG 8603-Close-up view of oil-soaked rags. Paint residues discarded among regular garbage.

IMG 6690-Product loading bay and flow path into Outfall 1. Ready-mixed concrete residues, exposed to storm water runoff.

IMG 2968-Close-up view of drainage point where ready-mixed concrete, wash water and stormwater runoff flow drains-off at end of installed berm.

IMG 2419-Entrance/exit into product loading bay. Ready-mixed concrete residues cover the pavement, and exposed to all environmental conditions.

IMG 6311-Truck in product bay being loaded with Ready-mixed concrete to be delivered to client construction site in the field.

B. Identified outfalls through which Facility discharges storm water associated with industrial activity, as observed during 2023 Inspection.

Outfall 1

Outfall 1 – Discharge of stormwater flow from the upper driveway into area storm water drainage system, then into Cane Garden Bay.

IMG 6607-Upper exit from Facility. Location where trucks loaded with Ready-mixed concrete leave Facility to deliver product to field sites. Point where dry-weather flows observed occuring and evidence of industrial storm water discharges.

Outfall 2

Outfall 2 – Discharge of storm water flow from the upper driveway into area stormwater drainage system, then into Cane Garden Bay.

IMG 3694-Lower entrance/exit of the Facility. Location where most of traffic into and out of the Facility occur. Point where dry-weather flows observed occuring and evidence of industrial storm water discharges.

Outfall 3

Outfall 3 – Discharge of storm water flow at a point along the northwestern corner into an adjacent lot. Stormwater runoff drains towards Cane Garden Bay.

IMG 8205-Truck in product bay being loaded with ready-mixed concrete to be delivered to client construction site in the field.