

INSPECTION REPORT

Inspection Entry Date/Time	May 31, 2024, 12:05 p.m. (CST)	Announced: No
Inspection Exit Date/Time	May 31, 2024, 04:08 p.m. (CST)	Access: Granted
Weather	Sunny	
Media	Water	
Statute(s)/Program(s)	Clean Water Act, National Pollutant Discharge Elimination System (NPDES) permit program	
Type of Inspection	Industrial Stormwater Inspection (ISI)	
Permittee Name	Kinder Morgan	
Facility or Site Name	Limestone Storage Area, Bottom Ash Storage Area, South Salt Domes, Main Terminal, Cargill Salt Pad	
Facility/Site Physical Address	Kinder Morgan Bulk Terminal/1225 S. Carferry Dr, 1235 S Carferry DR, 1601 S Carferry DR, 1900 S. Harbor, 1201 E. Bay Street.	
City, State, Zip Code	Milwaukee, WI 53207	
County/Borough/Parish	Milwaukee	
Facility GPS Coordinates		
Mailing Address (If different)	William_Baines@Kindermorgan.com	
FRS ID		
Permit Number(s) (If Applicable)	WIU000039, WIU000041, WIU000037, WIU000040	
SIC and/or NAICS	4226	
Lead Inspector:		
William Jones	WILLIAM JONES	Digitally signed by WILLIAM JONES Date: 2024.08.07 11:19:16 -05'00'
	EPA REGION 5	Jones.William@epa.gov (312) 886-6058
Supervisor Review:		
Molly Smith	MOLLY SMITH	Digitally signed by MOLLY SMITH Date: 2024.08.07 11:35:20 -05'00'
	EPA REGION 5	Smith.Molly@epa.gov

SECTION I – INTRODUCTION

Site Entry and Inspection Objectives

EPA Region 5 Lead Inspector, William Jones, arrived at Kinder Morgan Bulk Terminals (the “Site” or “Facility”), located at various addresses listed above all of which are located on the Port of Milwaukee in Milwaukee, Wisconsin at 12:05 p.m. (CST) on May 31, 2024, for an unannounced inspection. EPA Region 5 Lead Inspector presented credentials to William Baines and informed him that this was an EPA Region 5 inspection to

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investigate elements as authorized by Clean Water Act (CWA) Section 308 and implementing regulations. This report is based on information supplied by Kinder Morgan representatives, direct observations made by EPA Region 5 inspectors, records and reports maintained by the permittee and other information including: photographs taken by EPA Region 5 inspectors, verbal or written statements made by information supplied by Kinder Morgan representatives during or subsequent to the on-site inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA Region 5 inspectors by Kinder Morgan representatives during or subsequent to the on-site inspection. In addition, information gathered prior to or subsequent to the inspection from a review of US Environmental Protection Agency (EPA), state, and/or public records may be included in this report.

Attendees

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA REGION 5	William Jones	Lead Inspector	Yes	Yes
EPA Region 5	Andi Hodaj	Environmental Engineer	Yes	Yes
Wisconsin DNR	Jamie Lambert	Wastewater Specialist Senior	Yes	Yes
Wisconsin DNR	Elexius Passante		Yes	No
Port of Milwaukee	Brian Kasprzyk	Chief Engineer	Yes	No
Kinder Morgan	William Baines IV	Operations Manager MBT	Yes	Yes

Facility/Site Description

EPA REGION 5 lead inspector confirmed the following facility information:

Facility/Site Information**Location(s)**

Location/Area/Sub-area	Description
Limestone pile/parcel 8	Area where limestone can be loaded onto ships via a conveyor
Bottom ash area/open dock	Area where bottom ash is stored
Salt Dome area/parcel 31	Location of two salt domes
Salt pile adjacent to salt dome area/parcel 32	Area where salt is stored uncovered
Salt pile on parcel 17	Salt pile and ditch on west side of salt pile
Storm drain inlet on S. Harbor Drive, and parcel 1/3 area	This is an inlet on S. Harbor drive and inlets that are in the parcels 1 and 3 area.

SECTION II – OBSERVATIONS

Location: Limestone pile/parcel 8		
Observation #: WJ1-OB-001	Date: May 31, 2024	Weather: Sunny

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EPA observed the pebble limestone pile and conveyor where it is loaded onto ships. EPA observed the limestone piled up to the edge of the Kinnickinnic River under the conveyor.

Photos 1 to 2

Location: Bottom Ash Area/open dock

Observation #: WJ1-OB-002

Date: May 31, 2024

Weather: Sunny

EPA observed Bottom Ash stored in this area along the river. EPA observed that the concrete jersey barriers were not containing the ash, and ash was outside of the barriers nearby the Kinnickinnic River. EPA observed that the inlet protection, by the orange cone, was not completely covering the inlet, and the piles of ash were uncovered/exposed. EPA observed ash mixed into the storm water that was ponded and appeared to have drained to the inlet, by the orange cone, that leads to the Kinnickinnic River, according to the stormwater pollution prevention plan (SWPPP).

Photos 3 to 11

Location: Salt dome area/parcel 31

Observation #: WJ1-OB-003

Date: May 31, 2024

Weather: Sunny

EPA observed two salt domes in this area. EPA observed that some of the salt had spilled outside of the salt dome. EPA observed salt-stained ground, up to the edge of the site, and the Kinnickinnic River.

Photos 12 to 17

Location: Salt pile adjacent to salt pile area/parcel 32

Observation #: WJ1-OB-004

Date: May 31, 2024

Weather: Sunny

EPA observed salt staining on the ground leading to the Kinnickinnic River.

Photos 18 to 20

Location: Salt pile on parcel 17

Observation #: WJ1-OB-005

Date: May 31, 2024

Weather: Sunny

EPA observed a hole in the tarp covering the salt pile, and water appeared to have washed the salt off the pile, in the area below the hole, and it had stained the pavement and street nearby.

Photos 21 to 27

Location: Storm drain inlet on S. Harbor Drive, and parcel 1/3 area		
Observation #: WJ1-OB-006	Date: May 31, 2024	Weather: Sunny
EPA observed that the facility’s best management practices, at the time of the inspection, have not been effective in keeping the salt from entering the inlet on S. Harbor Drive. Also, the salt pile on parcel 3 is nearby two inlets; however, the SWPPP states that these inlets lead to the combined sewer. The SWPPP does not show the blueish green colored plastic pipe with slits cut into the bottom. At the time of the inspection, it was not clear if this also drains to the combined sewer.		
Photos 27 to 32		

SECTION III – RECORDS REVIEW

Records may not be in sequential order

Record: Storm Water Pollution Prevention Plan		AOC: No
Ref #: WJ1-RR-001	Reviewed By: William Jones	Reviewed Date: July 31, 2024
The SWPPP did not identify the blueish green pipe, shown in photograph 32. Additionally, the SWPP did not identify where storm water enters this pipe and where it goes, i.e. storm or combined sewer.		

SECTION IV – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted.

SECTION V - AREAS OF CONCERN

It was unclear at the time of the inspection if the bottom ash storage, identified in Kinder Morgan’s SWPPP as parcel 2 (1235 S. Carferry Drive), is covered by an industrial stormwater permit. During the inspection, the filter fabric was not adequately covering the inlets, and material has piled along the river. Additionally, at the time of the inspection, bottom ash was being used to hold down the fabric on top of the jersey barriers, which does not help to contain the bottom ash.

During the inspection, the inspectors witnessed salt that was not completely covered in several areas, which has led to salt blowouts, salt staining on the roadway, and salt entering the storm sewer on S. Harbor Drive. Salt was also observed outside of the salt storage buildings. EPA observed salt staining the Kinnickinnic River. EPA observed poor housekeeping and a lack of clean-up of the spilled salt.

At the time of the inspection the SWPPP was not updated to show the additional storm drain inlet at the ash storage area. Also, the blueish-green pipe identified by EPA inspectors during the inspection was not investigated to determine if this is an inlet for storm water, where it goes to, nor is it included in the SWPPP.

Terminal 4 and 4a – at the time of the inspection it was unclear if the interior building drains are connected to the storm drain system. The facility was unaware.

See above observations in section II and III related to the areas of concern.

SECTION VI – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

The EPA REGION 5 Lead Inspector held a closing conference with Facility personnel at 03:10 p.m. on May 31, 2024, for the inspection. During the closing conference, EPA REGION 5 Lead Inspector discussed the observations and Areas of Concern identified during the inspection. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination.

William Jones, along with Andi Hodaj, Jamie Lambert and Will Baines, were present for the closing conference. Mr. Jones shared that the observations and Areas of Concern were preliminary. Mr. Jones confirmed that no information gathered was considered Confidential Business Information. Mr. Jones then relayed the following preliminary observations to the facility representatives:

- Lime storage area – the unloading of material appears to have spilled material at the edge of the river.
- Plumbing for Terminal 4a and 4 (1500 S. Lincoln Memorial Drive) - Unknown if the indoor plumbing is connected to the storm water system.
- Inlet by the cruise ship/ash storage area - Unknown if the inlet is connected to the storm sewer system. The inlet is not being inspected. Also, material was observed along the edge of the river.
- Ash storage area - The berm around the ash storage pile is not adequate to keep the ash from entering the drain and being transported to the river. EPA inspectors observed an inlet in the bottom ash storage pile area, identified with a cone, that is not on the SWPPP maps, nor was it clear at the time of the inspection where this goes to. During the inspection, EPA inspectors observed salt leading to the river and corroding the metal pilings in the area south of the salt domes. At the time of the inspection, inspectors observed salt staining that had created a trail to the river, at the Compass site. At parcel 17, inspectors observed a salt blowout that led to salt reaching the roadway. Inspectors observed the storm inlet along S. Harbor Drive (see photos), which had a salt-stained trail leading to it and was heavily corroded during the inspection. EPA inspectors noted that the scale at 1900 S. Harbor has an inlet by it that receives storm water with salt, but it is unclear at the time of the inspection where the bluish green inlet pipe connects to. Additionally, inspectors noted the salt pile was uncovered nearby. EPA inspectors noted an insufficient berm around the salt pile on parcel 5 and 6.

Follow Up

No information was requested by the inspector to be shared after the inspection.

SECTION VII – LIST OF APPENDICES

1. Photo Log
2. Document Log
3. Port of Milwaukee Parcel map

APPENDIX 1: PHOTO LOG



Photograph 1. Small pile of limestone and conveyor at parcel 8.			IMGP0001.JPG
May 31, 2024/1:00 p.m.		No PII	Photographer: William Jones
Port of Milwaukee Parcel 8.			
North-west			



Photograph 2. Limestone material at edge of parcel 8 under the conveyor. The material is piled up to the top edge of the pilings along the Kinnickinnic river.			IMGP0002.JPG
May 31, 2024/1:02 p.m.		No PII	Photographer: William Jones
Port of Milwaukee Parcel 8			
Camera Direction: West			



Area just north of the bottom ash pad. The inlet has a cloth filter and sediment has accumulated around the inlet.			IMGP0003.JPG
May 31, 2024/1:19 p.m.		No PII	Photographer: William Jones
Port of Milwaukee parcel A open dock area			
Camera Direction: North			

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Photograph 4. Area just north of the bottom ash pad. The inlet has a cloth filter and sediment has accumulated around the inlet. This is also shown in photograph 3.			IMGP0004.JPG
May 31, 2024/1:19 p.m.		No PII	Photographer: William Jones
Port of Milwaukee parcel A open dock area			
Camera Direction: Down			



Photo 5. Bottom ash stored next to Kinnickinnic River. Ash is not contained within the barriers and is located on the edge of the river.			IMGP0005.JPG
May 31, 2024/1:25 p.m.		No PII	Photographer: William Jones
Port of Milwaukee Parcel A open dock area			
View looking South			



Photograph 6. Bottom Ash pile along the river. The orange cone sits on top of a catch basin. It appears that rain water ponds in the area as can be seen by the water marks on the ash piles. The piles are uncovered.			IMGP0006.JPG
May 31, 2024/1:35 p.m.		No PII	Photographer: William Jones
Port of Milwaukee parcel A open dock area.			
View looking North			



Photograph 7. Close up of orange cone shown in photograph 6 and area surrounding it. The catch basin inlet can be seen below the orange cone. Filter fabric does not completely cover the inlet.			IMGP0007.JPG
May 31, 2024/1:36 p.m.		No PII	Photographer: William Jones
Port of Milwaukee parcel A open dock area.			
View looking down			



Photograph 8. Close up of catch basin inlet shown in photograph 7 and area surrounding it. Filter fabric does not completely cover the inlet.			IMGP0008.JPG
May 31, 2024/1:36 p.m.		No PII	Photographer: William Jones
Port of Milwaukee Parcel A open dock area			
View looking down			



Photograph 9. Bottom Ash pile along the river. The orange cone sits on top of a catch basin. It appears that rain water ponds in the area as can be seen by the water marks on the ash piles. This area is also shown in photographs 6-8.			IMGP009.JPG
May 31, 2024/1:37 p.m.		No PII	Photographer: William Jones
Port of Milwaukee parcel A open dock area			
View looking north			



Photograph 10. Area showing pooled storm water with ash piles shown at top of photograph. These same ash piles are shown in photographs 6 and 9. It appears that water has flowed from the pooled water to the location of the orange cone in the past.			IMG0010.JPG
May 31, 2024/1:41 p.m.		No PII	Photographer: William Jones
Port of Milwaukee parcel A open dock area			
View looking north			



Photograph 11. Close up of ponded water in photo 10 in ash storage area.			IMGP0011.JPG
May 31, 2024/1:42 p.m.		No PII	Photographer: William Jones
Port of Milwaukee parcel A open dock area			
View looking down			

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Photograph 12. Salt on the ground between the salt domes and salt stored outside of the dome at the entrance to the dome.			IMGP0012.JPG
May 31, 2024/1:47 p.m.		No PII	Photographer: William Jones
Salt domes at Parcel 31			[Geographic Coordinates]
Looking Westerly			



Photograph 13. Salt on the ground between the salt domes. This area is also shown in photograph 12.			IMGP0013.JPG
May 31, 2024/1:50 p.m.		No PII	Photographer: William Jones
Port of Milwaukee Parcel 31 salt domes			
View looking Westerly			



Photograph 14. Area west of the salt domes by the Kinnickinnic River. The grayish coloring on the pavement/ground appears to be salt. Holes were observed in the sheet pilings along the edge of the river.			IMGP0014.JPG
May 31, 2024/1:52 p.m.		No PII	Photographer: William Jones
Port of Milwaukee parcel 31 area			
View looking westerly			



Photograph 15. Area along the Kinnickinnick River show in photograph 14. The metal sheet pilings appear corroded and have holes in them.			IMGP0015.JPG
May 31, 2024/1:53 p.m.		No PII	Photographer: William Jones
Port of Milwaukee parcel 31 along the waterfront.			
View looking Southerly			

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Photograph 16. View of sheet pilings shown in photograph 15 showing the holes and corrosion.			IMGP0016.JPG
May 31, 2024/1:53 p.m.		No PII	Photographer: William Jones
Port of Milwaukee lot 31 area along the Kinnickinnick River			
View looking westerly			



Photograph 17. Closeup of area adjacent to salt domes showing ponded salt water			IMGP0017.JPG
May 31, 2024/1:58 p.m.		No PII	Photographer: William Jones
Port of Milwaukee parcel 31 area			
View looking easterly			



Photo 18. Shows a salt pile on the right side of the photograph and grayish white salt staining on the ground on the left side of the photograph leading to the river.			IMGP0018.JPG
May 31, 2024/2:03 p.m.		No PII	Photographer: William Jones
Port of Milwaukee view of lot 32			
View looking Northwest			



Photo 19. Close up of salt staining in photograph 18 leading towards the river.			IMGP0019.JPG
Date/Time: May 31, 2024/2:04 p.m.		No PII	Photographer: William Jones
Port of Milwaukee view of parcel 32 with Kinnickinnic River in the background.			
View looking Northwesterly			



Photograph 20. Closeup of the wall along the Kinnickinnic River showing erosion and holes in the wall leading to the river. This area is shown in photograph 19.			IMGP0020.JPG
May 31, 2024/2:05 p.m.		No PII	Photographer: William Jones
Port of Milwaukee area along open dock near parcel 32.			
View looking westerly			



Photograph 21. Showing a structure with water flowing into it from a ditch on the east side of the salt pile located on parcel 17. The SWPPP indicates that this leads to the combined sewer.			IMG0021.JPG
May 31, 2024/2:25 p.m.		No PII	Photographer: William Jones
Port of Milwaukee parcel 17.			
View looking southerly and down			

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Photograph 22. View of top of structure shown in photograph 21 and ditch on east side of salt pile.			IMGP0022.JPG
May 31, 2024/2:25 p.m.		No PII	Photographer: William Jones
Port of Milwaukee parcel 17			
View looking south-west			



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Photograph 23. View of concrete structure shown in photograph 22 and 21. Salt staining can be seen on the ground in the center of the photograph			IMG0023.JPG
May 31, 2024/2:28 p.m.		No PII	Photographer: William Jones
Port of Milwaukee parcel 17, north-west side of salt pile			
View looking south-west			



Photograph 24. Salt water can be seen ponded on the north side of the salt pile with staining leading out towards the gate and onto the roadway.			IMG0024.JPG
May 31, 2024/2:29 p.m.		No PII	Photographer: William Jones
Port of Milwaukee parcel 17			
View looking westerly			

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Photograph 25. Salt water can be seen ponded on the north side of the salt pile with staining leading out towards the gate. This area is also shown in photograph 24.			IMGP0025.JPG
May 31, 2024/2:29 p.m.		No PII	Photographer: William Jones
Port of Milwaukee parcel 17			
View looking westerly			



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Photograph 26. North side of the salt pile with staining shown in the gutter outside of the fenceline. Also see photograph 25.			IMGP0026.JPG
May 31, 2024/2:29 p.m.		No PII	Photographer: William Jones
Port of Milwaukee parcel 17			
View looking northerly			



Photograph 27. North side of salt pile showing area that has lost salt. The black plastic cover is also ripped open in the top right-hand side of the photograph. This appears to have allowed rainwater to go under the tarp and to wash salt off the pile and onto the pavement.			IMGP0027.JPG
May 31, 2024/2:34 p.m.		No PII	Photographer: William Jones
Port of Milwaukee parcel 17			
View looking southerly			



Photograph 28. Photograph of storm drain inlet between parcel 9 and S. Harbor Drive showing a salt trail leading to the storm drain inlet. The salt pile in the top middle of the photograph is uncovered along parcel 5.			IMG0028.JPG
May 31, 2024/2:41 p.m.		No PII	Photographer: William Jones
Port of Milwaukee along S. Harbor Drive along parcel 9			
View looking southerly			

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Photograph 29. Close-up of the storm drain inlet shown in photograph 28 showing the salt staining around the inlet and the corrosion.			IMGP0029.JPG
May 31, 2024/2:41 p.m.		No PII	Photographer: William Jones
Port of Milwaukee along S. Harbor Drive along parcel 9			
View looking down			



Photograph 30. Storm drain inlet near the scale and just north of salt pile on parcel 1. This is also shown in photograph 31.			IMGP0030.JPG
May 31, 2024/3:00 p.m.		No PII	Photographer: William Jones

Port of Milwaukee parcel 1 and 3	
View looking down	



Photograph 31. Storm drain inlet near scale just north of salt pile on parcel 3. The salt pile can been seen at the top of the photograph. Salt has stained the pavement and leads to the storm drain inlet. This is also shown in photograph 30. The SWPPP indicates that this drains to the combined sewer.			IMGP0031.JPG
May 31, 2024/3:00 p.m.		No PII	Photographer: William Jones
Port of Milwaukee parcels 1 and 3			
View looking west			



Photograph 32. Riser pipe with slits at the bottom. The salt pile is uncovered next to the pipe. It is unknown where the pipe drains to.			IMGP0032.JPG
May 31, 2024/3:04 p.m.		No PII	Photographer: William Jones
Port of Milwaukee parcel 1 and 3			
View looking westerly			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
SWPPP	Storm Water Pollution Prevention Plan, Milwaukee Bulk Terminal, August 2022	No	No		5-31-2024

APPENDIX 3: Port of Milwaukee parcel map



