



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date: 5/2/2024
Regulatory Program: National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Industrial Stormwater
Facility Name: Waste Management Northeast Transfer
Permittee: Waste Management Northeast Transfer
Facility Owner/Operator: Northeast Transfer
Facility Address: 2160 Queen Chapel Road NE
Washington, DC 20018
Latitude and Longitude: 38.920240, -76.973790
Permit No.: DCR050000 (Master General Permit)
Site Specific Permit No.: DCNOE3002 (No Exposure Certification)
NPDES Permit Effective Date: 05/14/2020 (Applied for Coverage)
NPDES Permit Expiration Date: 02/28/2026
SIC code: 4212
Unique Project #: ECAD-5373

Site/Facility Representative(s):

Angelique Vera

Phone: 540-940-3265

Email: avera@wm.com

EPA Inspectors:

Pete Gold, USEPA Region 3-Inspector

Phone: 215-814-5236

Email: gold.peter@epa.gov

Shane McAleer, USEPA Region 3-Inspector

Phone: 215-814-5616

Email: mcaleer.shane@epa.gov

State/Local Inspectors:

Robert Burnett, DC DOEE

Phone: 202-578-6237

Email: robert.burnett@dc.gov

Report Preparer

Signature/Date

Peter Gold (3ED32), NPDES Section 1

Supervisor

Signature/Date

Mike Greenwald (3ED32), Acting Section Chief, NPDES Section 1

TABLE OF CONTENTS

I. INTRODUCTION 3

 A. Inspection Opening Conference..... 3

 B. Weather and Precipitation..... 3

 C. Summary of the Facility 4

II. OBSERVATIONS 5

III. CLOSING CONFERENCE..... 6

List of Attachments:

- Attachment A: 2021 EPA Multi-Sector General Permit (MSGP) for Stormwater Discharges Associated with Industrial Activity
- Attachment B: Photograph Log
- Attachment C: Notice of Intent (NOI) No Exposure Certification (NEC)
- Attachment D: DC DOEE Inspection Report
- Attachment E: May 10, 2024, Post Inspection Photos Provided by Northeast Transfer

I. INTRODUCTION

On May 2, 2024, representatives from EPA Region 3 and representatives of the DC Department of Energy and Environment (“DOEE”) (hereinafter, collectively referred to as “the Inspection Team”) arrived at the Waste Management Northeast Transfer facility (hereinafter, “the Facility”) in Washington, DC. The purpose of the inspection was to verify the Facility’s designation as a “No Exposure” facility under EPA’s Multi-Sector General Permit (MSGP) for Stormwater Discharges Associated with Industrial Activity, “No Exposure Certification” No. DCNOE3002 (hereinafter, the “NEC”) and other applicable regulations.

A. Inspection Opening Conference

The Inspection Team arrived at the Facility at approximately 8:00 a.m. for the inspection. The Inspection Team met with the following Facility representatives:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region 3 Inspectors			
Peter Gold	USEPA Region 3	215 814 -5236	Gold.Peter@epa.gov
Shane McAleer	USEPA Region 3	215-814-5616	McAleer.Shane@epa.gov
Sam Magro	USEPA Region 3	215-814-3158	Magro.Sam@epa.gov
State/Local Inspectors			
Robert Burnett	DC DOEE	202-578-6237	Robert.Burnett@dc.gov
Hokti Shepard	DC DOEE	202-878-0389	Hotki.Shepard@dc.gov
Site/Facility Representatives			
Angelique Vera	Waste Management	540-940-3265	Avera@wm.com
Alfredo Mendoza	Waste Management	202-756-2719	Smendoz2@wm.com

Mr. Pete Gold, Mr. Shane McAleer, Mr. Sam Magro, Ms. Hokti Shepard and Mr. Robert Burnett displayed their credentials to the Facility Representatives at the outset of the inspection, and explained the purpose of the inspection was to evaluate its designation as an NEC facility. A copy of the 2021 Permit is provided in Attachment A. The Inspection Team informed the Facility Representatives 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

At the time of the inspection, the weather was partly cloudy skies. No precipitation was experienced during the inspection. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and 5 days prior are provided in Table 2 below.

Table. 2 Precipitation Preceding Inspection¹

Station Name	Date	Precipitation Amount (inches) ²
ALEXANDRIA 5.6 SSW, VA US US1VAFX0063	04/27/2024	0.00
ALEXANDRIA 5.6 SSW, VA US US1VAFX0063	04/28/2024	0.05
ALEXANDRIA 5.6 SSW, VA US US1VAFX0063	04/29/2024	0.00
ALEXANDRIA 5.6 SSW, VA US US1VAFX0063	04/30/2024	0.00
ALEXANDRIA 5.6 SSW, VA US US1VAFX0063	05/01/2024	0.01
ALEXANDRIA 5.6 SSW, VA US US1VAFX0063	05/02/2024	0.00

C. Summary of the Facility

The Northeast Transfer Station facility is a 3.5-acre trash transfer station located at 2160 Queens Chapel Road, Washington, DC. The facility consists of a small office building, the trash transfer building, and a vehicle rack used to place tarps over trucks.

Trash is collected in the city and brought by residential garbage trucks to the facility. Trash is then transferred to larger trucks for trucking out of the city for disposal. Most site activity happens within the trash transfer building. After being weighed on a scale, garbage trucks drive entirely into the building and drop their trash on a ramp that gently slopes towards the west. At the western end of the ramp is a drive through lane where larger trucks pull in and have the trash loaded into them.

Upon loading the trash, the trucks exit the building and enter a rack where the driver gets out and places a tarp over the bed of the truck, this activity is conducted without cover. After this is done the truck is weighed on a scale before departing the site.

Areas exposed to stormwater at the facility include the parking areas for personal vehicles, the truck scales, and the drive area where trucks wait to enter the transfer building and exit onto before departing the site. The site has a large oil-water separator (installed in 2004) in the northwest corner of the property. The site is sloped so that the majority of storm water that falls on the facility flows towards the northwest corner of the property. Storm drains are in the northwest portion of the property, which collect stormwater from the site and direct it through the oil-water separator before it enters the DC municipal separate storm sewer system (MS4). The facility does not contain outdoor fueling, or maintenance operations on site. The facility does not own or maintain a fleet of vehicles which are stored at the facility.

¹ Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

II. OBSERVATIONS

As part of the inspection, the Inspection Team visually observed Facility conditions and documented those conditions through Photographs.

The Photographs (Attachment B) for this report have been processed using EPA Region 3 's Photograph Management Process. A camera generated file name (e.g., PC050006) is assigned to each Photograph as part of the process. The file names generated by the camera are used to identify each Photograph in the Main Narrative and Photograph Log of this inspection report. Unused Photographs are digitally stored and maintained in the inspection file. Unused Photographs are available upon request.

The following section presents the Inspection Team's observations relative to the Facility's Permit requirements and the Facility's No Exposure Certification.

Permit Requirement

Part 1.5 of the 2021 MSGP states "If you are covered by this permit and become eligible for a "no exposure" exclusion from permitting under 40 CFR 122.26(g), you may file a No Exposure Certification (NEC). You are no longer required to have a permit upon submission of a complete and accurate NEC to EPA. If you are no longer required to have permit coverage because of a no exposure exclusion and have submitted a NEC to EPA, you are not required to submit a NOT. You must submit a NEC form to EPA once every five years."

Observation 01:

The Facility in their Notice of Intent (NOI) completed an "Exposure Checklist" that indicated the Facility had no operations, storage or residuals exposed to precipitation. DC DOEE documented in their 2017 Inspection Report (Attachment D) the following: "It is DOEE's determination that the No Exposure certification for the facility as it is currently maintained is not appropriate."

No Exposure Checklist

The Facility's No Exposure Certification contains an Exposure Checklist, which states the following: "For your facility, are any of the following materials or activities exposed to precipitation, now or in the foreseeable future?" The Facility marked "No" for "Using, storing or cleaning industrial machinery equipment, and areas where residuals from using, storing or cleaning industrial machinery or equipment remain and are exposed to stormwater."

Observation 02:

The Inspection Team observed the puddling of odor suppressants outside of the covered trash transfer station. This condition was documented in Photographs 15, 16, 17 and 18 of Attachment B. The odor suppressant was potentially exposed to stormwater and possibly subject to migration.

No Exposure Checklist

The Facility's No Exposure Certification contains an Exposure Checklist, which states the following: "For your facility, are any of the following materials or activities exposed to precipitation, now or in the foreseeable future?" The Facility marked "No" for "Materials or residuals on the ground or in stormwater inlets from spills/leaks".

Observation 03:

The Inspection Team observed what appeared to be a black liquid with floatables covered with a film in the oil water separator. This condition was also observed and documented in DC DOEE's 2017 Inspection Report (Attachment D). The condition at the time of the EPA inspection is documented in Photographs 1, 2 and 3 of Attachment B.

Materials in the oil water separator were discharging to the District's MS4 system where it would discharge to Hickey Run. The oil water separator was covered by a large spare tire and an unfitted grate this could potentially allow sediments to enter the oil water separator. The oil water separator cover is documented in Photograph 7 of Attachment B. On May 10, 2024, the Facility provided the inspection team with a post inspection photo of the oil water separator cover (Attachment E).

Dark sediments and trash were observed throughout the site and accumulating in outdoor areas such as the scales where they could be exposed to stormwater and potentially migrate off-site (Attachment B, Photographs 7, 8, 9 and 11). Dark sediments similar to what were seen on site were observed tracking out on Queen Chapel Road and accumulating along the curb (Attachment B, Photographs 20-23).

No Exposure Checklist

The Facility's No Exposure Certification contains an Exposure Checklist, which states the following: "For your facility, are any of the following materials or activities exposed to precipitation, now or in the foreseeable future?" The Facility marked "No" for "Material handling equipment (except adequately maintained vehicles)".

Observation 04:

The Inspection Team observed at the time of the inspection a broken, temporarily inoperable front end loader awaiting repair on the Facility lot. A drip pan was placed under the loader. There appeared to be a sorbent material under the drip pan. At the time of the inspection this vehicle was potentially exposed to stormwater. The condition at the time of the EPA inspection is documented in Photographs 13 and 14 of Attachment B.

No Exposure Checklist

The Facility's No Exposure Certification contains an Exposure Checklist, which states the following: "For your facility, are any of the following materials or activities exposed to precipitation, now or in

the foreseeable future?" The Facility marked "No" for "Materials or products during loading/unloading or transporting activities".

Observation 05:

The rack where drivers cover their open cargo containers is outdoors and exposed to precipitation. This is documented in Photographs 11 and 12 of Attachment B.

No Exposure Checklist

The Facility's No Exposure Certification contains an Exposure Checklist, which states the following: "For your facility, are any of the following materials or activities exposed to precipitation, now or in the foreseeable future?" The Facility marked "No" for "Waste material (except in covered non-leaking containers [e.g., dumpsters])".

Observation 06:

The Inspection Team observed an uncovered, partially full dumpster by the oil water separator. This is documented in Photographs 4 and 5 of Attachment B. On May 10, 2024, the Facility provided the inspection team with a post inspection photo of the emptied uncovered dumpster (Attachment E).

The Inspection Team observed trash throughout the site. The Facility did have people picking up trash within the site and on the street by hand during the day. This is documented in Photographs 9 and 11 of Attachment B. On May 10, 2024, the Facility provided the inspection team with post inspection photos of the site after it had been swept (Attachment E).

No Exposure Checklist

The Facility's No Exposure Certification contains an Exposure Checklist, which states the following: "For your facility, are any of the following materials or activities exposed to precipitation, now or in the foreseeable future?" The Facility marked "No" for "Materials or products stored outdoors...."

Observation 07:

The Inspection Team observed an uncovered pile of stone aggregate stored outside by the trailers. This is documented in Photographs 6 and 10 of Attachment B.

General Observation

Observation 08:

The Inspection Team observed a manhole near a fuel tank within the transfer station. Site representatives did not know where the manhole went to and there appeared to be previous leaks/spills from the fuel tank. This is documented in Photograph 18 of Attachment B.

III. CLOSING CONFERENCE

At the conclusion of the onsite inspection, the Inspection Team met with the Facility Representatives for a closing conference. The Inspection Team shared preliminary observations with the Facility Representatives and requested additional documentation from the Facility. The Inspection Team reiterated that all preliminary observations discussed were not compliance determinations. All preliminary observations shared were subject to further review 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 approximately 10:00 AM (EST).