



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date: 12/5/2023
Regulatory Program: National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Industrial Stormwater
Facility Name: High Steel Structures
Permittee: High Steel Structures LLC
Facility Owner/Operator: High Steel Structures
Facility Address: 1915 Old Philadelphia Pike,
Lancaster, PA 17602
Latitude and Longitude: 40.0421°N, 76.2499°W
Permit No.: PAR203574 (administratively extended)
PAG033838 (pending issuance)
NPDES Permit Effective Date: 09/24/2016
NPDES Permit Expiration Date: 09/23/2021 (administratively extended)
SIC code: 3441

**Report Preparer
Signature/Date**

Peter Gold (3ED32), NPDES Section 1

**Supervisor
Signature/Date**

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List of Attachments:

- Attachment A: 2023 NPDES General Permit for Discharges of Stormwater Associated with Industrial Activity (PAG-03)
- Attachment B: Photograph Log
- Attachment C: Facility PPC (dated December 2023)
- Attachment D: 2016 NPDES General Permit for Discharges of Stormwater Associated with Industrial Activity (PAG-03)

I. INTRODUCTION

On December 5, 2023, representatives from EPA Region 3 and a representative of the Pennsylvania Department of Environmental Protection ("PADEP") (hereinafter, collectively referred to as "the Inspection Team") arrived at the High Steel Structures facility (hereinafter, "the Facility") in Lancaster, PA. The purpose of the inspection was to verify compliance with the Facility's coverage under Pennsylvania's National Pollutant Discharge Elimination System ("NPDES") General Permit for Discharges of Stormwater Associated with Industrial Activity (PAG-03) Permit No. PAR203574 (hereinafter, the "Permit") and applicable State and Federal regulations.

A. Inspection Opening Conference

The Inspection Team arrived at the Facility at approximately 12:50 p.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
Erin DeSandro	USEPA Region 3	215-814-2125	Desandro.Erin@epa.gov
Benjamin Evick	USEPA Region 3	304-234-0272	Evick.Benjamin@epa.gov
State/Local Inspectors			
Pat McGee	PA DEP	717-756-5220	Patrmcgee@pa.gov
Site/Facility Representatives			
Luke Mowrer	High Steel Structures	717-465-5456	Lmowrer@high.net
Kelvin Fermin	High Steel Structures	Not Provided	Kfermin@high.net
Barry Miller	High Steel Structures	717-475-1768	Blmiller@high.net
Scott Werkheiser	High Steel Structures	717-926-4934	swerkheiser@high.net

Mr. Pete Gold, Ms. Erin DeSandro, and Mr. Benjamin Evick displayed their credentials to the Facility Representatives at the outset of the inspection, and explained the purpose of the inspection was to observe compliance with its Permit. A copy of the 2016 Permit is provided in Attachment D, and a copy of the 2023 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
Lancaster Airport, PA US USW00054737	11/30/2023	0.00
Lancaster Airport, PA US USW00054737	12/1/2023	0.18
Lancaster Airport, PA US USW00054737	12/2/2023	0.02
Lancaster Airport, PA US USW00054737	12/3/2023	0.42
Lancaster Airport, PA US USW00054737	12/4/2023	0.00
Lancaster Airport, PA US USW00054737	12/5/2023	0.00

C. Summary of the Facility

In 1931, the High Welding Company was founded in Lancaster, Pennsylvania. High Steel specializes in high-quality fabrication for bridge superstructures, building girders, and other heavy weldments and is one of North America's largest structural steel fabricators. The company provides structural steel for over 150 projects annually with the bulk of the projects occurring in the Mid-Atlantic. Many large parts are assembled on-site and then shipped to the project. High Steel has provided steel structures for many large infrastructure projects such as the Woodrow Wilson Bridge on the Washington D.C. Beltway, the I-495 "Hot Lanes" project in Northern Virginia and the Governor Mario M. Cuomo Bridge in N.Y.

II. OBSERVATIONS

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

The photographs (Appendix - B) for this report have been processed using EPA Region 3 's Photo Management Process. A file name (e.g., 2023-12-05--14.55.41_2023-12-05--14.55.41_PC050006) which incorporates the date and time the photo was taken (e.g., 2023-12-05--14.55.41), as well as the original camera generated file name (e.g., PC050006) is assigned to each photo as part of the process. The file names generated by the camera are used to identify each photo in the Main Narrative and Photo Log of this inspection report. Unused photos are digitally stored and maintained in the inspection file. Unused photos are available upon request.

The following section presents the Inspection Team's observations relative to the Facility's Permit requirements.

Permit Requirement

Part C.II.B.8 of the 2016 Permit and Part C.II.D.9 of the 2023 Permit requires the permittee to "Keep all dumpster lids closed when not in use. For dumpsters and roll off boxes that do not have lids, ensure that

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

discharges have a control (e.g., secondary containment, treatment), or locate them under permanent cover. This General Permit does not authorize dry weather discharges from dumpsters or roll off boxes.”

Part C.IV.A of the 2016 Permit and the 2023 Permit requires the permittee to develop and implement a Preparedness, Prevention, and Contingency (PPC) Plan.

Item 1 of Table 7.3 of the December 2023 Environmental Emergency Response Plan (EERP) High Steel Structures states “Not all plant dumpsters have lids. The dumpsters must all be under cover by September 25, 2017 to be in compliance with the new General Stormwater permit.”

Observation 01:

The Inspection Team observed several dumpsters handling a wide variety of items without lids or covers and with no apparent secondary containment. The Inspection Team observed a dumpster with dozens of used paint cans without apparent cover or secondary containment (photos PC050007 – PC050010). The paint cans are empty or near empty but do contain remnants of what is believed to be an oil-based paint. The Inspection Team observed in multiple roll-off boxes without lids or covers that held steel waste (photos PC050029 and PC050050); the Inspection Team did not observe any secondary containment around these containers. The Inspection Team observed a roll-off box without any apparent lid or cover holding totes of particulate material (photo PC050059). The totes do not appear to be torn or ripped. The Inspection Team observed two roll-off boxes containing mixed wastes without an apparent cover or lid (Photos PC050053, PC050054 and PC050074). The Inspection Team did not see secondary containment around any of these dumpsters or roll-off boxes.

Permit Requirement

Part C.II.E.1 of the 2016 Permit requires the permittee to “Maintain an organized inventory of materials on-site. Plainly label containers (e.g., “Used Oil,” “Spent Solvents,” “Fertilizers and Pesticides”) that could be susceptible to spillage or leakage to encourage proper handling...” and Part C.II.G.1 of the 2023 Permit requires the permittee to “Maintain an organized inventory on-site. Plainly label containers (e.g. “waste oil”, “Spent Solvents”, “Fertilizers and Pesticides”) that could be susceptible to spillage or leakage to encourage proper handling....”

Observation 02:

The Inspection Team observed a few unlabeled containers holding fluids at the facility. The Inspection Team observed two unlabeled 5-gallon plastic containers that were holding unknown liquids at the time of inspection (Photo PC050025).

Permit Requirement

Part C.II.C.3 of the 2016 Permit and Part C.II.E.3 of the 2023 Permit requires the permittee to “Minimize the potential for waste, garbage and floatable debris to be discharged by keeping exposed areas free of such materials, or by intercepting them before they are discharged.”

Observation 03:

The Inspection Team observed several empty containers and drums around the facility and migrating off the facility as well as some bagged trash. The Inspection Team observed a full trash bag and loose trash on the facility’s grounds (Photo PC050011). The Inspection Team observed a few old containers from the facility located down a hill in the rear of the facility (Photo PC050020). The Inspection Team observed four uncovered containers and an uncovered

drum (Photo PC050026); a few of the containers have collected what is believed to be rainwater. The Inspection Team observed what appeared to be used filter socks on the ground near a roll-off box (Photo PC050061).

Permit Requirement

Part C.IV.A of the 2016 Permit and the 2023 Permit requires the permittee to develop and implement a Preparedness, Prevention, and Contingency (PPC) Plan.

Item 3 of Table 7.2 of the December 2023 Environmental Emergency Response Plan (EERP) High Steel Structures shows that drums stored require secondary containment.

Observation 04:

The Inspection Team observed two drums filled windshield wash without any visible secondary containment (Photo PC050039). The drums were located outside behind the garage.

Permit Requirement

Part C.IV.A of the 2016 Permit and the 2023 Permit requires the permittee to develop and implement a Preparedness, Prevention, and Contingency (PPC) Plan.

Item 9 of Table 7.2 of the December 2023 Environmental Emergency Response Plan (EERP) High Steel Structures shows that steel shot/dust drums and supersacks are supposed to be stored under cover.

Observation 05:

The Inspection Team observed several drums of steel shot, dust and zinc dust stored outside without any visible cover (Photos PC050057, PC050058 and PC050059).

Permit Requirement

Part C.II.D.1 of the 2016 Permit and Part C.II.F.1 of the 2023 Permit requires the permittee to “...minimize erosion and pollutant discharges by stabilizing exposed soils and placing flow velocity dissipation devices at discharge locations to minimize channel and stream bank erosion and scour in the immediate vicinity of stormwater outfalls.”

Observation 06:

The Inspection Team observed potential scouring of the swale leading to Outfall 002. The swale did not appear to line up correctly with a culvert pipe, and it appeared to show erosion in the up-swale and down-swale direction (Photos PC050030, PC050035 and PC050036).

Permit Requirement

Part C.II.B.1 of the 2016 Permit and Part C.II.D.1 of the 2023 Permit requires the permittee to “Use grading, berming, or curbing to prevent runoff of polluted stormwater and divert run-on away from areas that contain or have the potential to generate polluted stormwater.”

Observation 07:

The Inspection Team observed several inlets in the parking lot and near garages that appeared to lack inlet protection. The Inspection Team also observed inlets located near drum storage areas that appeared to lack inlet protection and the drums as noted in observation 4 lacked visible cover. There were also areas where loose material such as “Spent Shot” steel, de-icing

material, and aggregate stone were placed adjacent to inlets without berming or other containment present. (Photos PC050005, PC050006, PC050023, PC050024, PC050052, PC050060, PC050062, PC050063, PC050064, PC050067, PC050068, PC050069 and PC050070)

III. CLOSING CONFERENCE

At the conclusion of the onsite assessment, 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. Additional documentation was received from the Facility on Thursday December 7th, 2023. The Inspection Team reviewed the additional documentation which included the last four facility discharge monitoring reports, quarterly stormwater self-inspection forms, the last three years of training sign in sheets, the 2021 and 2022 stormwater annual report and the most recent Environmental Emergency Response Plan. The 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 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 4:30 PM (EST).