

INSPECTION REPORT

Inspection Date:	April 23, 2025	Inspection Announced: No
Time:	Entry: 9:35 AM EST	Exit: 12:00 PM EST
Media:	Water	
Statute (s)/Program(s):	Clean Water Act, National Pollutant Discharge Elimination System (NPDES), Industrial	
Type of inspection:	CEI - Compliance Evaluation Inspection	
Access:	Granted	
Permittee Name:	Midwest Terminal Ironville	
Facility or Site Name:	Midwest Terminal Ironville	
Facility/Site Physical Address:	2863 Front Street	
(city, state, zip code)	Toledo, Ohio 43605	
County/Parish:	Lucas	
Permit Number:	OHR000007 (OEPA Facility Permit #: 2GR02035*BG)	

Persons Participating in Inspection:					
Title	Name	Phone	Email	Present at Opening Conference	Present at Closing Conference
Physical Scientist, EPA	Matthew Schulte	(312) 886-2405	schulte.matthew@epa.gov	Yes	Yes
Environmental Engineer	Joseph Forth	(312) 886-7275	<u>Forth.joseph@epa.gov</u>	Yes	Yes
Supervisor	Shawn Partin	--	Shawn.Partin@mwtti.com	Yes	Yes
General Manager	Mark Hall	--	Mark.Hall@mwtti.com	No	Yes
Lead Inspector:					
Matthew Schulte					
		Region 5	schulte.matthew@epa.gov	(312) 886-2405	
Supervisor Review:					
Molly Smith		MOLLY SMITH Digitally signed by MOLLY SMITH Date: 2025.06.27 09:43:34 -05'00'			
		Region 5	smith.molly@epa.gov	(312) 353-8773	

SECTION I – INTRODUCTION

Site Entry and Inspection Objectives

Region 5 Lead Inspector, Matthew Schulte, and inspector Joseph Forth arrived at Midwest Terminal Ironville Facility (the “Site” or “Facility”), located at 2863 Front Street, at 9:35AM on April 23, 2025, for an announced inspection. Inspectors presented their credentials to site supervisor Shawn Partin and informed the Facility that this was an EPA Region 5 inspection to investigate elements of the Clean Water Act (CWA) and the National Pollutant Discharge Elimination System (NPDES) permit program. The inspection was conducted under the authority of the CWA NPDES permit program and Section 308 of the CWA. The table above identifies the attendees that participated in the inspection.

This report is based on information supplied by Facility representatives, observations made by the Region 5 inspectors, and records and reports maintained by the permittee and Region 5. These include the following: direct observations made by the Region 5 inspectors, photographs taken by Region 5 inspectors, physical evidence collected by Region 5 inspectors, measurements taken by Region 5 inspectors, verbal or written statements made or supplied by Facility representatives (the permittee) during or subsequent to the on-site inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the Region 5 inspectors by Facility representatives during or subsequent to the on-site inspection. In addition,

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information gathered prior to or subsequent to the inspection from a review of U.S. EPA, State, and public records may be included in this report.

Facility/Site Description

Region 5 Lead Inspector confirmed the following Facility information with representatives from the Facility:

The Facility is a bulk storage and transloading facility. Raw materials are transported to Facility by barge and truck. Raw materials held onsite include iron pellets as ballast, limestone, mill scale, aluminum, and diced tomatoes. A majority of the material is shipped by truck, with the Facility receiving anywhere from 20-50 trucks per day. Mill scale and iron ore are the only materials that are brought in by barge. On average the Facility will store 300,000 tons of iron during the winter, and 150,000 – 250,000 tons of other material throughout the site.

The Facility has a storm water capture system that spans around the perimeter of the Facility. All of the storm water catch basins around the Facility connect to a containment area for Outfall 002-A. Outfall 002-A discharges to the Maumee River. Storm water captured in the dock area is directed to Outfall 001 which discharges to the Maumee River.

SECTION II – OBSERVATIONS

Observations made by the EPA intersection team during the site tour. Observations may not be in sequential order.

Unique Identifying No.	Observations	Area of Concern?
MS-OB-001	During the site tour, inspectors observed spilled material from unloading vessels stored on piles in the dock area (Photo #5).	Yes
MS-OB-002	During the site tour, inspectors observed storm water drains throughout the facility located near material piles (Photo #7).	Yes
MS-OB-003	During the site tour, inspectors observed some storage areas surrounded by ditches and berms to prevent runoff of materials (Photos: #3 and #4).	No
MS-OB-004	During the site route, inspector observed that only water used onsite appeared to be by water spray trucks for dust control.	No

SECTION III – RECORDS REVIEW

Records reviewed may not be in sequential order.

No.	Record
MS5-RR-001	Documents requested during inspection were supplied to EPA by email on April 25, 2025. Documents received included: • Storm Water Pollution Prevention Plan (SWPP) with Attachments

No.	Record
	- Coverage under State General Storm Water Permit - Stormwater Sample Results - Benchmark monitoring results and verification of completion

SECTION V - AREAS OF CONCERN

The presentation of areas of concern does not constitute a formal compliance determination or violation.

No.	
MS-OB-001	Spilled material from unloading vessels is stored on piles in the dock area (Photo #5). Facility's SWPPP: Section 3.2 – Good Housekeeping Maintaining clean area at the dock face area using brooms and/or shovels, cleaning fines and spillage from conveyor bents. EPA observed that the Facility's dock does not contain any berms or other barriers to prevent the piles of material from entering water runoff during rain events. Facility has stated that the spilled material is moved off the dock within a day or two.
MS-OB-002	Some storm water drains throughout the facility are located near material piles (Photo #7). Facility's SWPPP: Section 3.2 – Good Housekeeping Cleaning catch basins when the depth of debris reaches 60% of the sump depth. Debris should be prevented where possible from entering the catch basins, and cleaning may be required for routine operation and maintenance.
MS-RR-001	The Facility's SWPPP, provided to EPA on April 25, 2025, is dated November 2022. Some information within SWPPP, such as staff and contact names, is out of date. SWPPP should be evaluated on an annual basis and updated regularly to ensure correct employee training. Facility's SWPPP: Section 3.9 – Employee Training The Facility conducts SWPP plan and spill discharge prevention training for affected employees the Ironville Facility at least once per year to ensure ongoing adequate understanding of the SWPP Plan and response actions for the facility. In addition, all new employees will have initial SWPP training as part of employee orientation.

SECTION VI – CLOSING CONFERENCE AND FOLLOW UP**Closing Conference**

The Lead Inspector held a closing conference with Facility personnel on April 23, 2025, for the inspection. During the closing conference, the Lead Inspector discussed the observations and Areas of Concern identified

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during the inspection. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination.

SECTION VII – LIST OF APPENDICES

Appendix 1 – Photo Log [times listed on images are incorrect. Correct times for photos are in Eastern Standard Time (EST) to left of photo log.]

Facility Name & Location: Midwest Terminal Ironville 2863 Front Street, Toledo, Ohio 43605		Photographer: Matthew Schulte	Camera: Olympus Tough TG-6 (S/N #BJ5B21169)
Date Photograph Was Taken: April 23, 2025			
Photo No.: 1	Time: 10:54AM		
Direction Photo Taken: West			
Photo Description: Outfall 002-A into the Maumee River.			
		File: MTI_01.jpg	

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Date Photograph Was Taken: April 23, 2025			
Photo No.: 2	Time: 10:51AM		
Direction Photo Taken: South			
Photo Description: Containment Area prior to Outfall 002-A.			
		File: MTI_02.jpg	

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Date Photograph Was Taken: April 23, 2025			
Photo No.: 3	Time: 10:47AM		
Direction Photo Taken: Southwest			
Photo Description: Aluminum storage pile surrounded by ditch and berm.			
		File: MTI_03.jpg	

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Date Photograph Was Taken: April 23, 2025			
Photo No.: 4	Time: 11:14AM		
Direction Photo Taken: North			
Photo Description: Train tracks and berm to west of storage piles.			
		File: MTI_04.jpg	

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Date Photograph Was Taken: April 23, 2025			
Photo No.: 5	Time: 11:05AM		
Direction Photo Taken: Northeast			
Photo Description: Vessel unloading area and pile of spilled material.			
		File: MTI_05.jpg	

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Date Photograph Was Taken: April 23, 2025			
Photo No.: 6	Time: 11:14AM		
Direction Photo Taken: North			
Photo Description: Storage piles and track from vessel dock.			
		File: MTI_06.jpg	

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Date Photograph Was Taken: April 23, 2025			
Photo No.: 7	Time: 11:10AM		
Direction Photo Taken: South			
Photo Description: Drain leading to containment area for Outfall 002A			
		File: MTI_07.jpg	