



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): 09/29/2021
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Industrial Stormwater
Facility Name: Chemalloy Co., Inc.
Permittee(s): Chemalloy Company, LLC
Facility Operator: Chemalloy Company, LLC
Permittee Address: 1301 Conshohocken Road, Conshohocken, PA 19428
Facility Address: 1301 Conshohocken Road, Conshohocken, PA 19428
Facility Latitude: 40.101700
Facility Longitude: -75.316640
County/Parish: Montgomery
Permit No: PAR200003
NAICS Code: 331110
SIC: 3399
Unique Project #: 3E21WN009A

Facility Representative(s):

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Point of Contact



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Date

Unique Project#: 3E21WN009A

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I. Introduction

On September 29, 2021, an inspection team composed of staff from the U.S. Environmental Protection Agency (“EPA”) Region III (hereinafter, “EPA Inspection Team”) conducted an industrial stormwater inspection of the Chemalloy Co., Inc facility (hereinafter, “the facility”. The purpose of the inspection was to observe compliance with the Clean Water Act (CWA) and to verify compliance with the facility’s National Pollutant Discharge Elimination System (NPDES) Permit No. PAR200003 (hereinafter, the “Permit”) and applicable State and Federal regulations.

A. Inspection Opening Conference

The EPA Inspection Team arrived at the site at est. 10:00 AM. Representatives from the Pennsylvania Department of Environmental Protection (PADEP) were not in attendance. The following inspectors and representatives were present for the inspection:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Mike Greenwald	EPA Region III	(215) 814-2398	Greenwald.Michael@epa.gov
Shane McAleer	EPA Region III	(215) 814-5616	Mcaleer.Shane@epa.gov
Facility Representatives			
Luiz Spiezio	Chemalloy Co., Inc.	-	Luiz.spiezio@metalpowdergroup.com

Mike Greenwald and Shane McAleer displayed their credentials to the site 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 Permit is provided in Attachment 1. The EPA Inspection Team informed Mr. Spiezio 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 Conditions

During the inspection, weather was clear. The closest National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and 5 days prior are provided in the Table 2 below.

Table 2. Precipitation Data

Station Name	Date	Precipitation Amount (inches) ¹
CONSHOHOCKEN, PA US USC00361737	9/24/21	3.00
CONSHOHOCKEN, PA US USC00361737	9/25/21	0.00
CONSHOHOCKEN, PA US USC00361737	9/26/21	0.00
CONSHOHOCKEN, PA US USC00361737	9/27/21	0.00
CONSHOHOCKEN, PA US USC00361737	9/28/21	0.00
CONSHOHOCKEN, PA US USC00361737	9/29/21	0.18

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

II. Facility Activity

The facility was approved for permit coverage under the PAG-03 General Permit for Discharges of Stormwater Associated with Industrial Activity, with an effective date of September 1, 2017. The Permit identifies the permittee as Chemalloy Company, Inc. Facility representatives stated that the facility is now affiliated with the Metal Powder Group.

The facility is located at 1301 Conshohocken Road, Conshohocken, PA 19428. Approximately 35 employees operate on-site, and hours of operation are two eight-hour shifts from Monday to Friday.

The facility primarily grinds, sizes, and prepares approximately 300 different raw materials. The facility's Preparedness, Prevention and Contingency Plan ("PPC Plan"), which is dated May 2017 (see Attachment 3 for the PPC Plan) states, "The majority of the facility's raw materials are manufactured into products using a variety of methods such as drying, agglomeration, calcining, mixing and blending, size reduction, classification, and packaging. The small remainder is redistributed in the original containers without physical processing." All grinding and processing of materials occurs indoors. Raw materials are stored both indoors and outdoors. Products produced at the facility are shipped offsite. The facility representatives stated that the facility does not have any processes that generate wastewater.

The total facility area encompasses approximately 9.5 acres, which includes indoor operations, equipment storage areas, bulk material storage areas, chemical/liquid container storage areas, and stormwater collection areas. The PPC Plan contains a facility map labeled "Site Plan" that identifies these areas. The facility's PPC Plan identifies stormwater management practices to contain stormwater and to minimize exposure to pollutant generating sources. The PPC Plan identifies activities where potential spills and leaks may occur, including: material storage areas, diesel fuel, propylene glycol storage and use, waste oils, hydraulic/gear/motor oils, solvents, caustic soda, waste storage, salt, and oil filled transformers.

The stormwater conveyance system onsite includes various inlets throughout the site that drain to two separate outlets: Outlet 001 and Outlet 002. The system also collects offsite stormwater from an inlet on the southeastern corner of the site. This inlet is labeled only as "inlet" on the facility map. This inlet collect stormwater upstream of their system that may be in contact with another industrial site.

Outlet 001 is located in the parking lot at the southwest corner of the facility. Outlet 001 collects stormwater from inlets along the southern portion of the site, as well as any stormwater that is collected via the upstream inlet at the southeastern corner of the property. Discharges from Outlet 001 leave the site through a pipe that runs under Conshohocken Road. The pipe runs under another industrial site that is west of the facility and ultimately discharges into the Schuylkill River.

Outlet 002 is located in the northwestern corner of the facility. Outlet 002 collects stormwater from inlets along the northern portion of the facility. The area surrounding the Outlet 002 grate is a detention basin, which collects additional stormwater in the area. This area appeared to be heavily vegetated. The EPA Inspection team was not able to observe the grate where sampling is conducted at the time of the inspection due to the heavy vegetation making the area inaccessible. The PPC Plan indicates that the Outlet 002 discharges into a culvert under Conshohocken Road.

The facility is required to conduct sampling at their two outlets on a bi-annual basis to monitor for the parameters listed in Appendix B (Primary Metals) of the Permit. Sampling is conducted twice a year by Ramboll America's Engineering Solutions, Inc. (or "Ramboll"), which was formally O'Brien & Gere Engineers, Inc. Sample analysis is conducted by Eurofins Laboratories. Samples are taken at three locations: Outlet 001 and Outlet 002 are sampled as required by the Permit, and the facility takes additional samples for the upstream inlet located on the southeast side of the property that is tied into their stormwater drainage system. The facility representatives indicated that they sample at this upstream inlet location to ensure that they can monitor if the upstream flows collected at the inlet are contributing to any pollutant discharges at Outlet 001.

III. Observations

The inspection observations below are made pursuant to the requirements of the Permit. Photographs were taken during the inspection by Shane McAleer and are provided in attachment 2.

Preparedness, Prevention, and Contingency (PPC) Plan

The site's stormwater management practices are identified in the PPC Plan. The PPC Plan is attached as Attachment 3.

Part C.IV.A (Preparedness, Prevention and Contingency (PPC) Plan) of the Permit states, "The permittee shall develop and implement a PPC Plan in accordance with 25 Pa. Code Section 91.34 following the guidance contained in DEP's 'Guidelines for the Development and Implementation of Environmental Emergency Response Plans' (DEP ID 400-2200-001), its NPDES-specific addendum and the minimum requirements below."

Part C.IV.B of the Permit states, "The permittee shall review and if necessary update the PPC Plan on an annual basis, at a minimum, and when one or more of the following occur:

- 1. Applicable DEP or federal regulations are revised, or this General Permit is revised.*
- 2. The PPC Plan fails in an emergency.*
- 3. The facility's design, industrial process, operation, maintenance, or other circumstances change in a manner that materially increases the potential for fires, explosions or releases of toxic or hazardous constituents; or which changes the response necessary in an emergency.*
- 4. The list of emergency coordinators or equipment changes.*
- 5. When notified in writing by DEP."*

Observation 1. The EPA Inspection Team observed that the PPC Plan, at the time of the inspection, was dated May 2017. There did appear to be minor updates and corrections made to the PPC Plan, including to the list of emergency coordinators and the facility map, but these did not appear to be dated. Facility representatives noted that the PPC Plan was in the process of being updated and provided correspondence dated July 16, 2021 wherein it is noted that the facility requested assistance from a third-party contractor to update the PPC Plan.

The “Guidelines for the Development and Implementation of Environmental Emergency Response Plans” DEP ID 400-2200-001 (see Attachment 4) identifies the requirements of the PPC Plan. Section II.A (General Instructions) notes the following: “Table 3 outlines the basic elements of a PPC and SPR Plan. Each of these elements is further described in this guidance document. Certain plan elements may not be entirely applicable or appropriate for a specific manufacturing or commercial installation. In these cases the person preparing the plan should act accordingly and should provide a brief explanation as to why the plan element(s) in question is not applicable or appropriate.”

The “Description of Plan Elements” section includes the following requirement: “On a copy of a 7 ½ minute USES map show the following:

- Facility Location
- Facility name
- Facility ID #
- Name of 7 ½ minute USES quadrangle
- County
- Location of facility site and site boundaries
- Location of each storage tank
- Location of surface drainage courses leading away from the site, and major surface streams and tributaries near the site
- Location of any known public and private surface water intakes downstream from the site.”

This section also includes the following requirement: “Include a drawing which shows the following:

- General layout of the site
- Property boundaries
- Areas occupied by manufacturing or commercial activities
- Raw materials and product storage
- Loading and unloading operations
- High risk areas where spills and leaks most likely would occur
- Waste handling, storage, and treatment facilities
- Drains, pipes, and channels which lead away from potential leaks or spill areas
- Outfall pipes which discharge to surface streams or drainage channels
- Secure and open-access areas
- Entrance and exit routes to the site”

The facility has a facility map located in the PPC Plan that is labeled “Site Plan”. This facility map contains the general layout of the facility, stormwater conveyances, material storage areas, and other information that is specified in the “Guidelines for the Development and Implementation of Environmental Emergency Response Plans” document.

Part C.IV.A (Preparedness, Prevention and Contingency (PPC) Plan) of the Permit states, “The permittee shall develop and implement a PPC Plan in accordance with 25 Pa. Code Section 91.34 following the guidance contained in DEP’s ‘Guidelines for the

Development and Implementation of Environmental Emergency Response Plans' (DEP ID 400-2200-001), its NPDES-specific addendum and the minimum requirements below...

Observation 2. The EPA Inspection Team observed that the PPC Plan, at the time of the inspection, contained a facility map that did not appear to be consistent with the current facility layout.

An inlet was observed in proximity to Building No. 7 and Plant No. 6 that did not appear to be on the facility map provided. See Photograph DSCN2277.

An area between Building No. 5a and Warehouse A appeared to be used as empty drum storage. See Photographs DSCN2305 and DSCN2307.

Two inlets were located between Building No. 5a and Warehouse A that did not appear on the facility map. See Photographs DSCN2317, DSCN2319, and DSCN2322.

A manhole was located south of the "Outdoor Storage Area". This manhole did not appear to be on the facility map. See Photograph DSCN2367.

An area on the east side of the facility appeared to be used as material storage. Several open drums appeared to have metals stored inside. This area is labeled "Catch Basin (Covered/Sealed)" on the facility map. See Photographs DSCN2404, DSCN2432, and DSCN2435.

An area east of Plant No. 5 appeared to have palettes and drums stored. This did not appear to be labeled as a storage area on the facility map. See Photograph DSCN2449.

A storage pile of wood chips was being stored in the area east of Plant No. 5. This did not appear to be on the facility map. See Photograph DSCN2452.

The area north east of Building No. 7 did not appear to have an inlet. The facility map shows an inlet located by the north east corner of Building No. 7. See Photographs DSCN2494 and DSCN2495 for the area.

Training

Part C.IV.A.6 (Preparedness, Prevention and Contingency (PPC) Plan) of the Permit states, "The PPC Plan must include a plan for training employees and contractors on pollution prevention, BMPs, and emergency response measures. This training must be conducted in accordance with Part C II.E.3."

Part C.II.E.3 (Spill Prevention and Responses) of the Permit states, "Develop and implement employee and contractor training on the procedures for expeditiously stopping,

containing, and cleaning up leaks, spills, and other releases. The permittee shall conduct periodic training, no less than annually, and document the training on the Annual Report required by Part A III.C.1.”

Observation 3. The EPA Inspection Team observed that the PPC plan indicated that annual training is conducted for employees. At the time of the inspection, the PPC plan did not appear to have records of when the training occurred. The facility representative stated that they were unaware of the last date that the training occurred.

Operation and Maintenance

Part B.I.D (Proper Operation and Maintenance) of the Permit states, “The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances), including BMPs, which are installed or used by the permittee to achieve compliance with the terms and conditions of this General Permit. Proper operation and maintenance includes, but is not limited to, adequate laboratory controls such as appropriate quality assurance procedures. The permittee shall properly operate and maintain backup or auxiliary facilities or similar systems installed by the permittee, as necessary to achieve compliance with the terms and conditions of this General Permit. (25 Pa. Code §§ 92a.3(c), 92a.41(a) and 40 CFR § 122.41(e))”

Observation 4. The EPA Inspection Team observed various stormwater inlet grates that appeared to be in need of maintenance.

The grates to two inlets east of Plant No. 4 appeared to be covered in foliage and weeds. See Photographs DSCN2437, DSCN2438, and DSCN2441.

The grate to an inlet appeared to be covered in debris and pallets in an area east of Plant No. 5. See Photographs DSCN2450 and DSCN2451.

A grate to an inlet appeared covered in materials in the area south of Plant No. 5. See Photographs DSCN2489 and DSCN2491.

Observation 5. The EPA Inspection Team observed the area labeled “Detention Basin” on the facility map. The facility representatives indicated that this area contained a grate where Outlet 002 was located. The EPA Inspection team was not able to observe the outlet grate at the time of the inspection due to heavy vegetation making the area inaccessible. See Photograph DSCN2465.

Appendix B.III (Sector-Specific BMPs) of the Permit states, “In addition to the BMPs contained in Part.C.II of the General Permit, the permittee shall implement, at a minimum, all of the following BMPs that are applicable to the processes in place at the facility for which coverage under this General Permit is approved... D. Provide for reclamation of/ or erosion control on historic waste piles.”

Observation 6. The EPA Inspection Team observed a storage pile of wood chips that was being stored in the area east of Plant No. 5. There did not appear to be erosion controls present. See Photograph DSCN2452.

Pollution Prevention and Exposure Minimization

Part C.II.B (Pollution Prevention and Exposure Minimization) of the Permit states, "The Permittee shall minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff in order to minimize pollutant discharges by either locating industrial materials and activities inside or protecting them with storm resistant coverings wherever feasible. The permittee shall implement and maintain the following measures, at a minimum:..."

Part C.II.B (Pollution Prevention and Exposure Minimization) of the Permit states, "1. Use grading, berming or curbing to prevent runoff of polluted stormwater and divert runoff away from areas that contain polluted stormwater."

Observation 7. The EPA Inspection Team observed a pipe leading from Warehouse A to the parking lot of the facility in proximity to Outlet 001. See Photograph DSCN2215. The EPA Inspection Team observed that this was an indoor garage where vehicles were stored. The facility representatives stated that flows would enter the area from a garage door opening due to the sloped impervious pavements south of this area. See Photograph DSCN2346 for the garage opening. A pump and floor drains were installed in the garage to pump stormwater into the parking lot in proximity to Outlet 001.

Part C.II.B (Pollution Prevention and Exposure Minimization) of the Permit states, "2. Locate materials, equipment, and activities so that potential leaks and spills are contained or able to be contained or diverted before discharge to surface waters."

Observation 8. The EPA Inspection Team observed a tank at the entrance of Plant No. 4b. There appeared to be liquid that had spilled or leaked from this tank that was present on the ground, which was being collected in a stormwater drain. The facility representative stated that this is a water tank, and the water is used in the process of dust collection. See Photograph DSCN2394.

Part C.II.B (Pollution Prevention and Exposure Minimization) of the Permit states, "8. Keep all dumpster lids closed when not in use. For dumpsters and roll off boxes that do not have lids, ensure that discharges have a control (e.g. secondary containment, treatment). This General Permit does not authorize dry weather discharges from dumpsters or roll off boxes."

Part C.II.B (Pollution Prevention and Exposure Minimization) of the Permit states, "3. Clean up spills and leaks promptly using dry methods (e.g. absorbents) to prevent the discharge of pollutants to surface waters."

Observation 9. The EPA Inspection Team observed various onsite dumpsters that did not appear to have a lid or cover. Various dumpsters appeared to have liquid leaking from the bottom.

A dumpster was observed in the southwest area of the facility in proximity to Maintenance Shop Building No. B. This dumpster was labeled “Metal Only”. The dumpster appeared to have scrap material and various chemical containers. See Photographs DSCN2250 and DSCN2251. There also appeared to be a liquid on the ground that had leaked from the corner of the dumpster. See Photographs DSCN2252 and DSCN2253.

A dumpster south of the “Outdoor Storage Area” labeled on the facility map appeared not to have a lid or cover. See Photograph DSCN2364.

A dumpster in proximity to Plant No. 5 appeared to not have a lid or cover. See Photograph DSCN2391.

A dumpster west of the “Outdoor Storage Area” appeared to be uncovered. See Photograph DSCN2368 and DSCN2375. There appeared to be a liquid on the ground that had leaked from the bottom. See Photographs DSCN2371 and DSCN2372.

Spill Prevention and Responses

Part C.II.E (Spill Prevention and Responses) of the Permit states, “The permittee shall minimize the potential for leaks, spills and other releases that may be exposed to stormwater and develop a plan consistent with Part.C.IV for effective responses to such releases. The permittee shall conduct the following spill prevention and response measures, at a minimum: ... 2. Implement procedures for material storage and handling, including the use of secondary containment and barriers between material storage and traffic areas, or a similarly effective means designed to prevent the discharge of pollutants from these areas.”

Observation 10. The EPA Inspection Team observed various drums, containers, and barrels with liquids and materials throughout the site. These barrels appeared to lack secondary containment.

Empty drums were stored at the west side of Maintenance Shop Building No. B. See Photographs DSCN2226 and DSCN2227. A drum labeled “waste antifreeze” was observed in this area and did not appear to have secondary containment. See Photograph DSCN2234. A container labeled sulfuric acid was observed in this area and did not appear to have secondary containment. See Photograph DSCN2246.

Drums of antifreeze appeared to lack secondary containment south of Plant No. 6. See Photographs DSCN2267, DSCN2268, and DSCN2269.

Drums outside of Building No. 6a. did not appear to have secondary containment. See Photograph DSCN2351.

A drum storage area was observed in the “Bulk and Containerized Raw Material – Outdoor Storage” area of the facility. There did not appear to be secondary containment present for the drums in this area. See Photographs DSCN2361 and DSCN2362.

Drums did not appear to have secondary containment on the east side of the “Outdoor Storage Area”. See Photographs DSCN2400 and DSCN2401.

Drums were being stored in the “Recyclable Raw Material Storage (Drums)” area. These drums did not appear to have secondary containment. Various drums were labeled “Ethylene Glycol” and appeared to contain liquid. See Photograph DSCN2420. There also appeared to be drums labeled “corrosives” in this area without secondary containment. See Photograph DSCN2422.

Drums did not appear to have secondary containment in the area east of Plant No. 5. See Photograph DSCN2449.

Drums did not appear to have secondary containment in an area by Plant No. 2a labeled "Bulk and Containerized Raw Ore Outdoor Storage". See Photograph DSCN2458.

Good Housekeeping

Part C.II.C (Good Housekeeping) of the Permit states, “The permittee shall perform good housekeeping measures in order to minimize pollutant discharges including the routine implementation of the following measures, at a minimum: ...4. Eliminate floor drain connections to storm sewers.”

Observation 11. The EPA Inspection Team observed a floor drain in Warehouse A. The facility representative lifted the top of the drain and demonstrated that an inflatable plug was being used to prevent liquids from entering the drain. See Photographs DSCN2328 and DSCN2332.

Routine Inspections

The facility’s Environmental Health and Safety Manager conducts the facility’s semiannual inspections.

Part C.III.A (Routine Inspections) of the Permit states, “The permittee shall visually inspect the following areas and BMPs on a semi annual basis (calendar periods), at a minimum: ...

- 1. Areas where industrial materials or activities are exposed to stormwater.*
- 2. Areas identified in the Preparedness, Prevention and Contingency (PPC) Plan required in Part C IV as potential pollutant sources.*
- 3. Areas where spills or leaks have occurred in the past three years.*

4. *Stormwater outfalls and locations where authorized non-stormwater discharges may commingle.*
5. *Physical BMPs used to comply with this General Permit.*
At least once each calendar year, the routine inspection must be conducted during a period when a stormwater discharge is occurring. ”

Observation 12. The EPA Inspection Team reviewed the inspection records for the semiannual inspections that the facility conducted from 2019 to 2021 (see Attachment 5).

The Permit requires that the routine inspections occur at least once during a calendar year when a stormwater discharge is occurring. The inspection records did not have a section to include the weather and precipitation conditions at the time of the inspections. It was also indicated on the forms that there was “no flow” at Stormwater Outfalls (i.e. Outlets) 001 and 002 during all of the inspections conducted from 2019 to 2021.

The “areas where industrial materials and activities are exposed to stormwater” include locations such as the: Waste Oil Storage Area, Raw Material Storage Bays, Residual Waste Area, and Diesel Fuel Tank Area. It was unclear if these included other areas noted on the facility map, including the Outdoor Storage Area, Bulk and Containerized Raw Ore Outdoor Storage, Catch Basin, and the Equipment Storage Area.

The inspection forms were blank for the section labeled “Physical BMPs used to comply with NPDES Permit”. It was unclear what BMPs were inspected during the inspections and the condition of those BMPs.

Reporting Requirements

Part A.III.C (Reporting Requirements and NOI FEE) of the Permit states, “Annual Report – The permittee shall submit a complete Annual Report to the DEP office that issued the approval of General Permit coverage by May 1 each year using DEP’s PAG-03 Annual Report template, 3850-PM-BCW0083h. The Annual Report shall address activities under the General Permit for the previous calendar year. The permittee shall submit the Annual Report electronically if notified by DEP in writing. If the permittee discharges to a municipal separate storm sewer system (MS4), a copy of the Annual Report shall be submitted to the operator of the MS4. (25 Pa. Code § 92a.61(g))”

Observation 13. The EPA Inspection Team requested annual reports submitted in 2019, 2020, and 2021. The facility representatives stated that these reports were not completed for the time periods requested.

IV. Records Review

EPA requested and reviewed the following documents:

1. Notice of Intent (NOI)
2. Signed General Permit
3. The site map from the PPC plan that was current during the inspection.
4. Annual reports submitted in 2019, 2020, and 2021.
5. Routine Inspections conducted for 2019, 2020, and 2021
6. The PPC plan we reviewed during the inspection.
7. Chain of Custodies and Lab Analyses for 2019, 2020, and 2021 with the sampling/analysis for the Benchmark Monitoring required by the Permit.
8. Letter dated July 16, 2021 regarding updates to the PPC plan.

Records pertaining to the inspection report are attached, with additional records being kept on file.

V. Closing Conference

After the site walk, the EPA Inspection Team met with the site representatives for a closing conference. The EPA Inspection Team shared preliminary observations with the site representatives. The EPA Inspection Team reiterated to the site representatives that all preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared were subject to further investigation 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 1:30 PM.

V. List of Attachments

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|---------------|---|
| Attachment 1. | NPDES Permit |
| Attachment 2. | Photograph Log |
| Attachment 3. | PPC Plan dated May 2017 |
| Attachment 4. | Guidelines for the Development and Implementation of Environmental
Emergency Response Plans” DEP ID 400-2200-001 |
| Attachment 5. | Site Self Inspections 2019-2021 |