UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION 2
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION
MULTIMEDIA PERMITS AND COMPLIANCE BRANCH

NPDES STORMWATER RECONNAISSANCE INSPECTION
Industrial Activities

Owner/Operator

VIRGIN ISLANDS WASTE MANAGEMENT AUTHORITY
6196 Estate Glynn, Frederiksted, St. Croix, Virgin Islands 00850
Telephone Number: (340) 712-4962
http://www.viwma.org

Facility

ANGUILLA MUNICIPAL SOLID WASTE LANDFILL FACILITY
3C Estate Bethlehem Middle Works, St. Croix, USVI 00820
Latitude: 17°41´55.46˝ N; Longitude: 64°46´51.78˝ W
Telephone Number: 340-712-4962

Statute and Regulations

Sections 301(a), 308(a) and 402(p) of the Clean Water Act
NPDES Regulations: 40 C.F.R. §§ 122 and 445

Receiving Waters

Negro Bay and Kings Bay (Caribbean Sea)

NPDES ID: VIU056746

Inspection Date: March 14, 2024

Participating Personnel:

U.S. EPA:	Jim C. Casey, Senior Environmental Engineer Clean Water Act Team

VIDPNR:	George Patrick, Deputy Director of DEP Tel: (340) 773-1082 Email: george.partick@dpnr.vi.gov
VIWMA:	Luis Sylvester, Deputy Executive Director Tel: (340) 514-9866 Email: lsylvester@viwma.org Akima Williams, Compliance Manager Tel: (340) 712-4951 Email: alwilliams@viwma.org Floy Sackey, Director of Solid Waste Tel: (340) 626-7768 Email: alwilliams@viwma.org
VIWMA's CONSULTANT:	Miguel A. García Tel: (787) 243-7788 Email: mgarcia@oasis-cs.com

Inspection Report Prepared by:

Jim C. Casey — April 22, 2024

Jim C. Casey
Date
Senior Environmental Engineer
Clean Water Act Team
Multimedia Permits and Compliance Branch
Telephone Number.: (340) 714-2333
Email: casey.jim@epa.gov

Inspection Report Approving Officer:

JOSE RIVERA — Digitally signed by JOSE RIVERA Date: 2024.04.23 11:30:04 -04'00'

Jose A. Rivera.
Date
Clean Water Act Team, Team Leader
Multimedia Permits and Compliance Branch
Tel.: (787) 977-5842
Email: rivera.jose@epa.gov

1. BACKGROUND

The Anguilla Municipal Solid Waste Landfill facility ("ANGUILLA MSWLF" or the "Facility") is owned and operated by the U.S. Virgin Islands Waste Management Authority ("VIWMA" or "Authority") staged on land parcel 3C Estate Bethlehem Middle Works, St. Croix, U.S. Virgin Islands ("USVI"), in an industrial zone along the south-central coastal section of St. Croix, Virgin Islands, situated less than quarter of a mile southeast of the Henry E. Rolshen International Airport.

Operations of Anguilla began in the early 1960s and continues to be operated today. In about 2002, the Environmental Protection Agency ("EPA" or "Agency") issued Administrative Orders on Consent to bring the VIWMA into compliance with conditions of the Resource Conservation and Recovery Act ("RCRA") found at 40 C.R.F. § 258. EPA subsequently escalated enforcement for long-standing practices of improper management of solid waste disposal and inadequate maintenance of the Facility through a judicial Consent Decree (Docket Number RCRA-02-2001-7302) led by the U.S. Department of Justice on behalf of EPA.

In 1990, EPA developed permitting regulations under the National Pollutant Discharge Elimination system (NPDES)[1] to control stormwater discharges associated with eleven categories of industrial activity. As a result, NPDES permitting authorities, which may be either EPA or a state environmental agency, issue stormwater permits to control runoff from industrial facilities that fall under those categories, which included landfills, land application sites, and open dumps that receive or have received industrial waste, all of which require coverage under an NPDES permit for the discharge of stormwater associated with industrial activities.[2] Also, EPA developed regulation for the Landfill Point Source Category codified in 40 C.F.R. Part 445 regulating discharges of wastewater from landfill units.[3]

On March 14, 2024, Mr. Jim C. Casey, Senior Environmental Engineer (the "EPA Inspector") with the Clean Water Act Team, Multi-media Permits and Compliance Branch ("MPCB"), Caribbean Environmental Protection Division ("CEPD"), conducted a NPDES Stormwater Reconnaissance Inspection ("the 2024 Inspection") at the Facility. The 2024 Inspection was performed pursuant to the inspection authority under Section 308(a) of the Clean Water Act ("CWA"), as amended.

The main purposes of the 2024 Inspection were to evaluate the scope of the operations being conducted, the existing conditions as a result of those industrial operations, and the releases of pollutants that have occurred and/or potentially can occur into the surrounding environment of the Facility. During the 2024 Inspection, the EPA Inspector focused on among other things, the following:

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1 Pursuant to authority under the Clean Water Act ("CWA"), 33 U.S.C. § 1251 et seq.

2 **Stormwater discharge associated with industrial activity** means the discharge from any conveyance that is used for collecting and conveying stormwater and that is directly related to manufacturing, processing or raw materials storage areas at an industrial plant, found at 40 C.F.R. § 122.26(b)(14)(v).

3 https://www.ecfr.gov/current/title-40/chapter-I/subchapter-N/part-445.

a. The operations and practices conducted at the Facility regarding receiving, management, and proper disposal of waste materials, which include among others, scrap metal, non-hazardous wastes, household hazardous wastes, universal wastes, used tires in residential wastes, used oil received from residential sources, and landfilling of community (residential) solid wastes on the active working face of the Facility.

b. Management of wastewater streams, including, landfill leachate ("leachate")[4], resulting from operations at the Facility, the appropriate treatment applied, and discharge of these treated wastewater from the Facility into area surface water bodies.

c. Management of stormwater runoff and associated Best Management Practices ("BMPs") implemented at the Facility.

d. Review of records associated with operations conducted, and management of wastewater generated within and being discharged from the Facility.

This Inspection Report ("the 2024 Inspection Report") entails discussion of observations and findings regarding areas of concern and the conditions that existed at the Facility at the time of the 2024 Inspection.

2. GENERAL INFORMATION ABOUT THE INSPECTION CONDITIONS AND ACTIVITIES

The dates and times during which activities of the 2024 Inspection were conducted, and related weather conditions are summarized in **Table 1** (on the next page).

3. GENERAL INFORMATION ABOUT THE OWNER OF THE FACILITY

Anguilla is owned and managed by VIWMA. VIWMA is a public corporation engaged in the management and disposal of waste materials for the purpose of protection of the human health and the environments, and for the enhancement of economic development and the quality of life for residents of the USVI and the wider Caribbean region. As a semi-autonomous instrumentality of the Government of the USVI, VIWMA is mandated to serve all the residents of the USVI.

VIWMA occupy and operates Anguilla on the land parcel situated at the address previously mentioned in Section 1 of this 2024 Inspection Report. Mr. Roger Merritt is the Executive Director of the Authority and can be reached at 6196 Estate Glynn Frederiksted, VI 00850-9887, telephone number (340) 712-4962, or via e-mail: rmerritt@viwma.org.

4 Liquid formed when rainwater filters through wastes placed in a landfill. When this liquid comes in contact with buried wastes, it leaches, or draws out, chemicals or constituents from those wastes.

4. GENERAL INFORMATION ABOUT THE FACILITY AND BUSINESS OPERATIONS

VIWMA is engaged in solid waste management operations, and according to information received from the VIWMA representatives during the 2024 Inspection, the following operations which are occurring at the Facility include, among others:

Table 1

Dates of Facility Visits	Inspection Activity	Time Started & Ended	Weather Condition
3-14-2024	**Entrance on On-Site – The EPA Inspector entered Facility and made preparation for the Inspection.**	**9:00 am**	**Dry, clear skies and sunny, very hot**
	Entrance Interview– Upon arrival of DPNR's personnel, the EPA Inspector and DPNR personnel met with VIWMA's representatives and its Consultant ("VIWMA Team") in the Authority's conference room on-site. The EPA Inspector presented his Credentials. EPA and DPNR stated their purpose for their presence on-site. End of Entrance Interview.	**9:15 am** **9:30 am**	
	EPA Inspector requested a copy of the most recent Facility drawing or topographical map to facilitate conduct of the 2024 Inspection walkthrough. Discussion regarding conduct of operation, management of waste streams, and documentation related to final disposition of materials.		
	End of Discussion regarding conducted operations.	**10:35 am**	
	The EPA Inspector and DPNR personnel accompanied by the VIWMA Team began the walkthrough in the Waste Materials Processing Area (WMPA) immediately across the former Transfer Station Building.	**11:15 am**	

Dates of Facility Visits	Inspection Activity	Time Started & Ended	Weather Condition
	The EPA Inspector and accompanying parties proceeded to visit various operations locations at the Facility, including the working face of the landfill, scrap metal management, vegetative waste management, and leachate and stormwater management. End of walkthrough.	**1:15 pm** **1:15 pm**	
	Returned to conference room and conducted an Exit Meeting with the VIWMA Team and Consultant. End of Exit Meeting.	**1:25 pm** **2:20 pm**	
	The EPA Inspectors left Facility premises.	**2:30 pm**	

a. landfilling of community (residential) solid wastes on the active working face of Facility;

b. receiving and process of scrap metal;

c. receiving, management and storage of non-hazardous and universal wastes;

d. receiving, management of household hazardous wastes;

e. management of used tires received in residential wastes;

f. management of used oil received from residential sources; and

g. grinding collected vegetation wastes and processing into mulch products.

The industrial activities that are conducted by VIWMA at ANGUILLA MSWLF, include:

a. Received wastes trucked into the Facility through the weigh scale unit, where the weight of waste transported into the Facility is determined before the material-loaded trucks proceed to the tipping floor of the waste transfer station, or to another operational section of the Facility, such as the Waste Materials Processing Area (WMPA)[5].

5 Large open yard area in the section of the Facility where the former Waste Transfer Station is situated, and that VIWMA currently uses as its staging location for receiving containerized liquid and other special wastes. For purposes of this 2024 Inspection, EPA has identified this area as the WMPA. The WMPA is exposed to all environmental conditions, including rain and stormwater runoff.

b. Waste streams diverted from the influent bulk waste are further processed by being landfilled or storage for subsequent disposal through shipment off-island.

Satellite Imagery of the Facility[6] is presented as **Figure 1** (immediately below) of this Inspection Report. The date of the satellite imagery is November 30, 2022.

Figure 1

VIWMA's Anguilla Municipal Solid Waste Landfill Facility, St. Croix, VI

5. NPDES PERMITTING FOR THE FACILITY

Discharges of Stormwater Associated with Industrial Activity into Waters of the United States

Section 402(p)(2)(B) of the CWA authorizes the Administrator of EPA to issue NPDES permits to stormwater discharges associated with industrial activity. EPA promulgated NPDES regulations defining the term stormwater associated with industrial activity. Those regulations are codified in 40 C.F.R. § 122.26(b). The industrial activity carried out at landfills, land application sites, and open dumps that receive or have received any industrial wastes (waste that is received from any

6 VIWMA's Anguilla MSWLF, 3C Estate Bethlehem Middle Works, St. Croix, USVI (Source: Google Earth Pro Imagery, dated November 30, 2022).

of the facilities described under this subsection) including those that are subject to regulation under Subtitle D of RCRA are included in the definition of stormwater discharges associated with industrial activity at 40 C.F.R. § 122.26(b)(14)(v).

On June 20, 2007, the Virgin Islands Department of Planning and Natural Resources ("DPNR") promulgated regulations pursuant to USVI Statute at 12 V.I.C. Chapter 7, Subchapter 184-45, which require owners/operators of facilities with stormwater discharges associated with industrial activities to apply for and obtain coverage under a Territorial Pollutant Discharge Elimination System ("TPDES") permit.

Pursuant to Section 402(p) of the CWA, 33 U.S.C. § 1342(p), and 40 C.F.R. §§ 122.21 and 122.26(e)(1), and USVI's Statute at 12 V.I.C. Chapter 7, Subchapter 184-45, **if evidence reveals that VIMWA's stormwater associated with industrial activity, and discharged from its Facility met the industrial activity definition described immediately above in Section 5, then the Authority was (and continues to be) required to apply for and obtain TPDES permit coverage.**

TPDES Permitting

DPNR issued the TPDES Multi-Sector General Permit ("2012 MSGP") for Stormwater Discharges from Industrial Activity pursuant to Subsection 184-46(a)(2)(i) of the TPDES regulations. The 2012 MSGP became effective on January 1, 2012 and expired on December 31, 2016. Since then, a new MSGP was issued on March 1, 2017 ("2017 MSGP" or the "Permit"), which expired on February 28, 2022.

6. GENERAL INFORMATION ABOUT THE RECEIVING WATERS

The Facility is situated along the south-central shoreline of St. Croix, and specifically, within the southeastern section of the watershed that drains into Negro Bay and Kings Bay (Caribbean Sea). An aerial view of the location of the Facility and immediate surroundings are depicted in a satellite imagery of the referenced Watershed featured in **Figure 2**, on the next page (Source: https://nepassisttool.epa.gov/nepassist/nepamap.aspx).

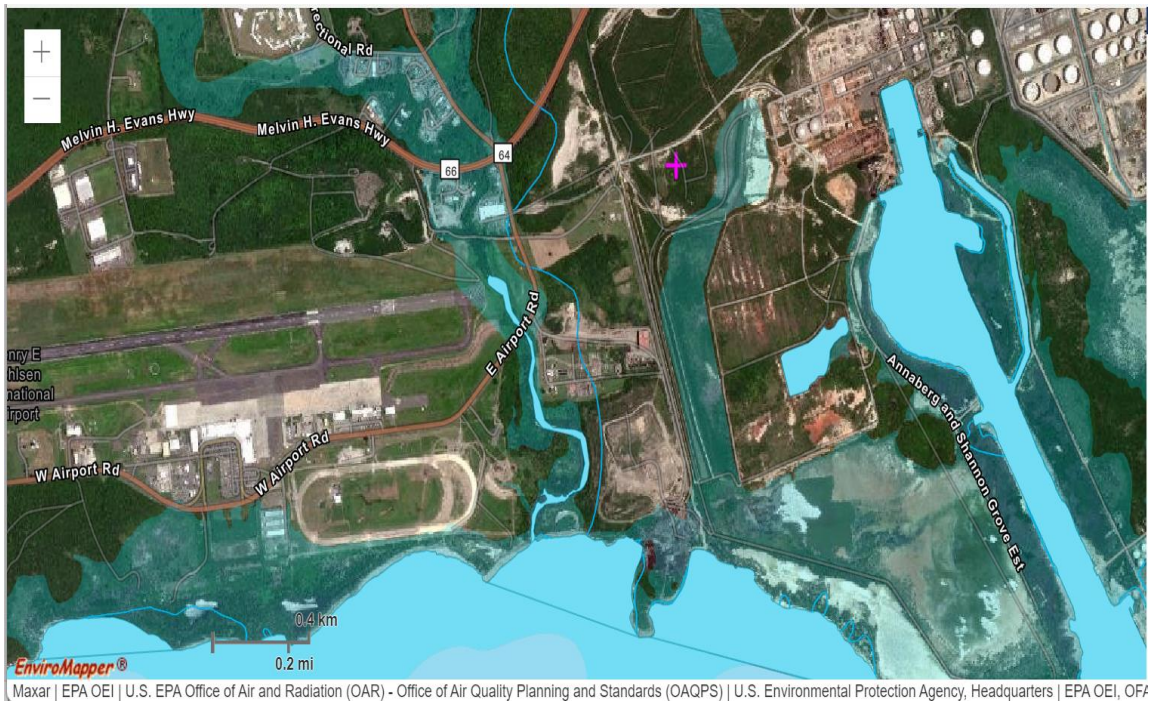
7. PRE – INSPECTION FILES REVIEW

a. Review of EPA's case files and Information databases

During the period from March 6 thru 12, 2024, the EPA Inspector conducted review of documents in the case files for VIWMA maintained at the Agency's Office in the USVI and searched EPA's Integrated Compliance Information System ("ICIS") and the Enforcement and Compliance History Online ("ECHO") databases to determine the TPDES permitting status for the Facility, and the recent compliance history. The review revealed that:

Figure 2

VIWMA's Anguilla MSWLF situated within the southeastern section the watershed



i. DPNR has not issued a TPDES individual permit to VIWMA for the Facility.

ii. DPNR has not performed a TPDES Inspection at the Facility since issuance of the 2012 MSGP on January 1, 2012.

b. Access and review of DPNR's case file

The EPA Inspector made arrangement with DPNR personnel and on March 13, 2024, accessed relevant case information on the Facility maintained at the Department's Regional Office at 45 Mars Hill, Frederiksted, St. Croix, VI 00845. EPA's review of DPNR's file associated with the Facility confirmed that the Department has not issued any TPDES permit to VIWMA authorizing the discharge of pollutants from Anguilla, and that available records did not show that a TPDES Compliance Evaluation Inspection has been performed at the Facility.

8. ENTRY, REVIEW OF RECORDS AND FACILITY WALKTHROUGH

a. Entry and Entry Interview

On March 14, 2024, the EPA Inspector entered the Facility at about 9:00 AM, and met with representatives of the VIWMA and its technical consultant ("the VIWMA Team") outside the Authority's trailer-office situated across the yard from the Facility's Weigh Scale operation. Representatives from DPNR's Division of Environmental Protection (DEP)[7] arrived on-site at about 9:15 AM, at which time, all parties proceeded to a conference room in the building where the Weigh Scale operation is housed. The EPA Inspector presented his EPA-issued Inspector Credentials, indicated the purpose for his presence at the Facility, and requested a copy of the most current topographical map of the Facility, in which the various operational sections are featured.

The names and contact information of the persons who participated in the 2024 Inspection activities were documented and is found in **ATTACHMENT 1** of this Inspection Report.

b. Review of Records

The EPA Inspector requested access to Facility records regarding operations conducted, generation, management and final disposition of waste streams and associated pollutants being discharged from the Facility into surface waters during the past three (3) years. The EPA Inspector identified some of the documents that the Agency was requesting, including:

- copies of any CWA program permits (e.g., NPDES, TPDES) and related permit applications, and materials manifests;
- copies of contracts entered by VIWMA with service providers for waste management;
- copy of the existing stormwater management system plan for the Facility;
- copy of a property lease agreement for land parcels on which the Anguilla MSWLF operations are conducted; and
- management structure (which feature position description) for the VIWMA's Division of Solid Waste Management.

Ms. Akima Williams, Compliance Manager, indicated that the requested documents were not readily accessible at the Facility location, and that the Authority was in turn requesting time to find and compile the list of records that the EPA Inspector requested. The EPA Inspector informed the VIWMA Team that the requested records on the Facility, along

[7] The DPNR Team consisted of Mr. George Patrick, Deputy Director of DPNR-DEP, and Ms. Clanicia Pelle, Solid Waste Program Manager for DEP. These officials present during the 2024 Inspection were not certified CWA-NPDES Inspectors, and therefore participated in the proceedings as observants and in a support capacity to EPA. In addition, DPNR used the opportunity to receive a status report from VIWMA regarding its RCRA Subtitle D program matters.

with a reasonable date by which the information must be submitted will be issued by EPA through an email correspondence on the day following the 2024 Inspection. The referenced email correspondence, entitled "Follow-up to a joint EPA-DPNR NPDES Stormwater Reconnaissance Inspection at VIWMA's Anguilla Landfill Facility on March 14, 2024", dated March 15, 2024, was transmitted that same day to attention of VIWMA, and is featured in **ATTACHMENT 2** of this Inspection Report.

c. Facility Walkthrough

The EPA Inspector conducted the walkthrough, accompanied by personnel from DPNR and the VIWMA Team, and evaluated sections of the Facility where the following operations described below were conducted. The EPA Inspector made observations and preliminary findings, and also documented them through pictures, which are featured in **ATTACHMENT 3** – **ANGUILLA MSWLF Photo Album, March 14, 2024 NPDES Stormwater Reconnaissance Inspection**.

i. **Weigh Scale Operation** – The Weigh Scale unit and related activities are housed in a building situated at the northwestern corner of section of the compound associated with the Waste Transfer Station. Evaluation of the referenced operational area revealed that stormwater runoff flows will come into contact with the operations in the WMPA, which in turn will drain towards and underneath the Weigh Scale unit. See **IMGs 1021** and **1022** of **ANGUILLA MSWLF Photo Album, March 14, 2024 RI, ATTACHMENT 3** of this 2024 Inspection Report.

ii. **The WMPA** – The WMPA is the large open unpaved area of the yard immediately in front and along the south side of the former Waste Transfer Station where VIWMA currently uses as its staging location for receiving and processing of waste materials, including; containerized liquid wastes, such as spent automotive oil and other engine fluids, used cooking oils, and other special waste materials, household hazardous wastes, electronic wastes, and universal wastes, all accumulated without proper segregation of the materials. As already referenced in Section 4 of this 2024 Inspection Report, the WMPA is exposed to all environmental conditions. Observations made in the WMPA revealed the following:

1. *Improper storage of potentially incompatible materials* – Chemical reactivity in the accumulated waste materials could lead to an explosion, and combustion of flammable waste materials staged in the area.

2. *Improper disposal of waste materials on-site* – Many of the containers were observed leaning on their side with contents spilled out onto the ground, and the ground area appeared super-saturated from the spilled liquid wastes, revealing that the waste materials accumulated were discarded by VIMWA.

3. *Improper housekeeping practices* – The containerized wastes staged in the WMPA were very disorganized, and without any evidence of BMPs employed.

The evidence of the concerns described in sub-paragraphs 8.c.ii.1 thru 3 documented during the 2024 Inspection is supported through **IMGs 1027, 1028, 1031** thru **1033** of **ANGUILLA MSWLF Photo Album, March 14, 2024 RI, ATTACHMENT 3** of this Inspection Report.

4. *Strong potential for release of pollutants through stormwater runoff discharges* – Observed evidence that stormwater runoff which comes into contact with waste materials staged in the WMPA will flow along stormwater runoff patterns through the compound, and off-site through identified discrete conveyances into the area stormwater management system, and which eventually drains into nearby Negro Bay and Kings Bay (Caribbean Sea). See **IMGs 1029, 1026, 1025, 1034** and **1051** of **ANGUILLA MSWLF Photo Album, March 14, 2024 RI, ATTACHMENT 3** of this Inspection Report.

iii. **Working Face of the Landfill** – Section of the Facility where active landfilling of community (residential) solid wastes was being carried out. During the 2024 Inspection, evidence revealed that the landfilling operation was situated in the southeastern quadrant of the landfilling section. Observations made on the working face of the landfill revealed the following:

1. *Improper management of leachate* – An earthen swale carved along the northeastern edge of the working face is used for capture and collection[8] of leachate into a pit at the end of the swale. Evidence revealed that the pit was filled with leachate and almost ready to overflow. Closer examination of the earthen walls of the pit revealed that the leachate had saturated through the walls, increasing the chances of a structural breach of the pit, and release of the waste.

2. *Improper disposal of leachate on-site* - A large pit with leachate situated at the very southeastern corner (toe of landfill cell) of the landfilling operations area was observed. According to Mr. Floy, Director of Solid Waste for the VIWMA, the large pit is in place to collect leachate from other sections of Anguilla. He further indicated that accumulated leachate in the large pit is periodically transferred through pumping of the leachate and spread over the surface of the working face of the landfill.

There is a strong potential for release of pollutants through stormwater runoff based on the management practices and system employed by VIWMA, as described in sub-

[8] The leachate collection system's job is to direct the leachate to collection sumps so it can be properly removed from the landfill.

paragraphs 8.c.iii.1 and 2, immediately above, and supported by evidence documents through **IMGs 1078** thru **1080,** and **1082, 1063,** and **1067** of **ANGUILLA MSWLF Photo Album, March 14, 2024 RI, ATTACHMENT 3** of this Inspection Report.

iv. **The Scrap Metal Management Operation** – The section of the Facility where the active receiving and processing of various metallic waste materials removed from the community's solid waste streams. The referenced operation is situated on a land parcel immediately southeast of the landfilling operation. Observations revealed that the activity associated with the scrap metal management could potentially lead to release of pollutants through stormwater runoff flow leaving the specific section of the Facility, including:

1. *Improper management of petroleum-based materials* – Evidence revealed that several 55-gallon drums that contained virgin and spent lubricants and other fluids used in support of the referenced operation, staged on palettes, were situated on the ground along a trafficked access road and exposed to all environmental conditions. The drums of materials were not secured within a secondary containment to prevent releases of the contents of the drums in the event of an accidental spill of the materials. The drums of materials were situated just up-stream from what appeared to be a stormwater runoff drainage path. Evidence observed were documented by the EPA Inspector through **IMGs 1077** and **1076** of **ANGUILLA MSWLF Photo Album, March 14, 2024 RI, ATTACHMENT 3** of this Inspection Report.

v. **Improper management of used tires (received in residential wastes)** – The section of the Facility where the referenced active of receiving and processing used tires is removed from community solid waste streams. The referenced operation is situated on land parcel immediately south of the landfilling operation section. Observed a large accumulation of loose used tires with vegetation growth surrounding several piles of the used tires. The EPA Inspector did observe any activity or evidence which would indicate that WMA has been engaged in processing the used tires for removal from the Facility. See **IMGs 1073** and **1074** of **ANGUILLA MSWLF Photo Album, March 14, 2024 RI, ATTACHMENT 3** of this Inspection Report.

vi. **Vegetative waste management** – Evidence reveals that WMA embarked on an initiative to grind accumulated vegetative waste with the intension to turn the processed materials into secondary useable products, such as mulch. The entire processing and resultant product are exposed to all environmental conditions, and that stormwater runoff that drains from the mulch windrows has led to condition that appears to be algal bloom. Stormwater runoff flow associated with the algae growth drains-off into the area stormwater drainage system, which eventually reaches the nearby shoreline of the Caribbean Sea. See **IMGs 1086** thru **1088** of **ANGUILLA MSWLF Photo Album, March 14, 2024 RI, ATTACHMENT 3** of this

Inspection Report.

vii. **Identification and Evaluation of Discrete Conveyances through which pollutants leave the Facility**

During the 2024 Inspection, the EPA Inspector observed evidence that several discrete conveyances through which stormwater associated with industrial activity are discharged out at the Facility. A more detailed description of the EPA Inspector's observations of the identified stormwater conveyances and their approximate locations within the Facility are documented in **Part B** of **ATTACHMENT 3 - ANGUILLA MSWLF Photo Album, March 14, 2024 RI** of this Inspection Report, and identified specifically as **IMGs 1020, 1051, 1053, 1044** and **1097**, respectively**.**

9. OTHER

All pictures taken during the 2024 Inspection were taken by the EPA Inspector using an EPA owned Canon (model number SX530 HS) camera to digitally document observations and findings made. The pictures presented in the **ANGUILLA MSWLF Photo Album, March 14, 2024 RI** (**ATTACHMENT 3**) feature only a part of a catalog of the pictures that were taken during the 2024 Inspection using the referenced camera. A full log of pictures documented is recorded and available in an electronic file at EPA's USVI Office, located at 1336 Beltjen Road, St. Thomas, USVI 00802.

10. POST INSPECTION RECORDS REVIEW

On March 25, 2024, the EPA Inspector received, through a series of electronic transmissions, VIWMA's submittal of documents that EPA requested in its March 15, 2024 correspondence. The EPA Inspector reviewed the information submitted by VIWMA and determined the following:

a. The address of the land parcel on which WMA operates the Anguilla MWSLF is 3C Estate Bethlehem Middle Works, St. Croix, VI. The area of the parcel was estimated to be 9.042 acres.

b. WMA entered a lease agreement with the Virgin Islands Port Authority for use of the referenced property, which became effective on or about July 14, 2011.

c. According to Ms. Williams, the referenced property lease agreement has expired; however, the EPA Inspector could not determine an expiration date of the lease agreement.

d. WMA did not submit a copy of its Standard Operating Procedures (SOP) for the various

operations conducted at the Facility.

e. VIWMA submitted a Stormwater Flow Diagram for the Facility in which a series of 4 sampling locations is identified for monitoring the quality of stormwater associated with industrial activity being discharged from the Facility into the environment surrounding ANGUILLA MSWLF. The Stormwater Flow Diagram was developed from a topographical survey conducted on November 7, 2023. The Stormwater Flow Diagram is featured in **ATTACHMENT 4** of this 2024 Inspection Report.

End of Report

ATTACHMENT 1 – **Names and contact information of the persons who participated in the 2024 Inspection activities**

ATTACHMENT 2 – **March 15, 2024 email correspondence documenting the EPA's request for records on March 14, 2024 related to WMA's operations at the Anguilla MSWLF**

ATTACHMENT 3 – **ANGUILLA MSWLF Photo Album, March 14, 2024 NPDES Stormwater RI**

ATTACHMENT 4 – **Stormwater Flow Diagram for ANGUILLA MSWLF, based on November 7, 2023 Topographical Survey**

ATTACHMENT 1

Names and contact information of the persons who participated in the 2024 Inspection activities

ATTACHMENT 2

March 15, 2024 email correspondence documenting EPA's request for records on March 14, 2024 related to WMA's operations at the Anguilla MSWLF

ATTACHMENT 3

ANGUILLA MSWLF Photo Album, March 14, 2024 NPDES Stormwater RI

ATTACHMENT 4

Stormwater Flow Diagram for ANGUILLA MSWLF, based on November 7, 2023 Topographical Survey