

**U.S. Environmental Protection Agency
Region 5**

Purpose: Clean Water Act National Pollutant Discharge Elimination System Compliance Evaluation Inspection

Facility: Watco Transloading, LLC
5297 River Road,
Cincinnati, Ohio, 45233

Inspection Date: February 23-24, 2023

EPA Representatives:

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Report Prepared by:

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11:57:16 -04'00'

Approver Name and Title: Brooke Furio, Multimedia Section Supervisor, Water Enforcement and Compliance Assurance Branch

Approver Signature and Date: BROOKE FURIO  Digitally signed by
BROOKE FURIO
Date: 2023.04.18
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PURPOSE OF INSPECTION

This report documents an inspection conducted by the U.S. Environmental Protection Agency (USEPA) at the Watco Transloading, LLC facility 5297 River Road, Cincinnati, Ohio, 45233 (Watco). The purpose of the USEPA inspection is to describe, evaluate, and document compliance with the Clean Water Act (CWA) and their National Pollutant Discharge Elimination System (NPDES) permit. The NPDES permit number is OH0105716 (Permit), the effective date is October 1, 2019 and an expiration date of September 30, 2024.

BACKGROUND

The Watco facility includes liquid side and a dry side bulk material handling where material can be offloaded from barges and transferred to other loading operations on rail or truck. The dry side materials are primarily salt with a small amount of fish meal and a specialty dirt used for baseball diamonds. The liquid side is recycled oil, methanol and an alcohol-based chemical called 245 Fluid. The NPDES permit effective at the time of the inspection lists five NPDES outfalls, 002, 003, 010, 011, and 012, and includes a requirement to develop a Stormwater Pollution Prevention (SWPPP), with benchmark monitoring. Watco provided a map which shows the approximate locations of the permitted outfalls. The map is shown on the next page.



LEGEND

⊕ Stormwater Sampling Location

0 200 400
APPROXIMATE SCALE IN FEET

Drawn by	Project Office	FILE NO.
11N	Watco River T Terminal	11N00169000
Project No.	02/06/2020	DATE
Source	Google Earth Pro Image dated 10/17/2018	SCALE
Project No.	2302-19-1172	see above

WATCO RIVER T TERMINAL
5297 RIVER ROAD
CINCINNATI, OHIO



STORMWATER
SAMPLING LOCATIONS

ENFORCEMENT AND COMPLIANCE HISTORY

Ohio EPA (OEPA) conducted a compliance inspection on February 10, 2021, and another on February 8, 2022. The 2021 inspection report cited 698 violations for missed reporting starting in October 2019 through January 2021.

The February 8, 2022, inspection report included the following findings:

1. The facility is in significant non-compliance (SNC) due to total suspended solids concentrations at Outfall 011.
2. The standard operating procedures (SOPs) in use at the facility for the analysis of pH do not include the minimum information required by the approved method.
3. The facility is collecting the sample used for the analysis of oil and grease in a glass container and transferring said sample to the container used for shipment to a third-party lab for analysis.
4. It was noted that the analytical method currently in use for the analysis of aluminum, lead and zinc appeared to be solid waste analytical methods.
5. The facility was not familiar with the General Lab Criteria (GLC) developed by the OEPA.
6. The facility submitted a NPDES permit modification request to extend the compliance schedule.

INSPECTION

Jonathan Moody and Danny Nguyen of USEPA first arrived at the Administration Building at 12:50 p.m. local time on February 23, 2023. Jonathan Moody and Danny Nguyen presented their credentials and identification to Rusty Smith and Carlton Lawrence.

Opening Conference

USEPA staff explained that the purpose of the inspection was to:

- Review Watco's records, including sample measurements, monitoring activities, and storm water plans, as required by the Permit;
- Conduct a walkthrough of the facility;
- Identify locations where storm water controls had the potential to be insufficient; and
- Inform Watco of areas of concern regarding the records review and facility walkthrough.

Records Review

During the inspection, USEPA began reviewing hard copy documents with the Watco staff. The following areas of concern were identified:

Whole Effluent Toxicity (WET) Testing Results

- The permit required five monitoring events during the time period January 1, 2020, through December 31, 2022. The five events were three periods of quarterly monitoring in 2020 and annual monitoring in 2021 and 2022. Quarterly monitoring, as defined in the permit, occurs in the months; March, June, August, and December. Annual monitoring, or yearly, as defined in the permit, occurs in September.
- DMR data for the five monitoring events in the January 1, 2020, through December 31, 2022, period report only one WET result, which occurred during the third quarter 2020. The remaining monitoring events do not show up as missed monitoring since codes for below detection, or conditional monitoring were used.
- During the inspection USEPA reviewed and obtained copies of the laboratory records for the WET testing conducted from January 1, 2020 through December 31, 2022. Table below summarizes the DMR Reporting and the laboratory records

Whole Effluent Toxicity Summary Table

Required Monitoring Period	DMR Reporting from ECHO	Laboratory WET records		
		Date	dubia TUa	Promelas TUa
2020 Q1 (March)	Below Detection	3/19/2020	20	25.2
2020 Q2 (June)	DMR missing	No Records Available	-	-
2020 Q3 (August)	Monitoring not Required – No Violation Identified	7/1/2020	>16	>16
2021 Annual (September)	Toxicity Violations	9/22/21	>16.0	5.1
2022 Annual (September)	Monitoring not Required – No Violation Identified	11/11/22	11.31	5.46

- The November 2022 DMR includes the results of WET analysis for the sample collected on November 11, 2022. However, the WET results shown on the November 2022 DMR do not appear in the effluent data in EPA's Integrated Compliance Information System (ICIS).
- WET testing was required during the third quarter 2020 and annual monitoring in 2022. The DMRs and report 'Monitoring not Required' for those periods. WET test laboratory results were available for those monitoring periods, however the samples were not collected during the month required in the permit.
- The first quarter 2020 monitoring period for WET testing appears as 'Below Detection' in the DMR, however the laboratory report shows detectable toxicity values.

Laboratory Samples, pH monitoring and Specific Conductivity

- Non-WET samples are sent to the ALS Environmental Lab in Cincinnati. The laboratory analysis includes the field parameters for pH and specific conductivity.

- An onsite review of the laboratory records for December 2022 and the DMR showed that Watco used the pH and specific conductivity values from the laboratory results for DMR compliance reporting.
- Watco provided records for periodic calibration of an Oakton 300 used for pH, temperature and specific conductivity measurements. The records document the calibration using either a 3-point calibration with buffers 4, 7 and 10, or a 2-point calibration with buffers 4 and 10. Conductivity is calibrated with a 1,413 uS/cm solution. A review of digital versions of the documents, provided by Carlton Lawrence include monthly calibration records for 2022 except for the months of January, September and October 2022. Per an email from Carlton Lawrence on March 22, 2023, no records could be located for January 2022, and no samples were collected in September and October 2022.
- The laboratory results for specific conductivity at the Outfall 001, for the sample collected on December 14, 2022, was 26 uMhos/cm. The result from the onsite conductivity analysis conducted by Rodney Hamilton using the Oakton 300 was 19.03 mS/cm, or 19,030 uS/cm which is three orders of magnitude higher than the laboratory result. For specific conductivity measurements a siemen (S) is equal to a Mho.
- No lab records were available for the reporting periods listed below. Carlton Lawrence said that samples were not collected those months since the facility was unable to access the outfall and collect the sample within the first 30 minutes of a measurable rainfall event.
 - February 2021
 - May 2021
 - July 2021
 - January 2022
 - March 2022
 - September 2022
 - October 2022
- No records were available for monitoring at outfalls 010 nor 012. Carlton Lawrence said that although the outfalls are listed in the permit, there were no monitoring requirements for those outfalls.

Benchmark Monitoring

- The permit contains stormwater benchmarks values for aluminum, lead and zinc. In a review of a summary document, provided by Watco, showed that the discharge at 011 was above the aluminum benchmark for most of 2022.
- The laboratory report for the August 2022 monitoring at Outfall 002 shows a discharge on August 30, 2022 where aluminum was 2.0 mg/L and above the benchmark value. In an email dated March 28, 2023, Carlton Lawrence confirmed there was no documentation for follow-up of this benchmark exceedance.
- In an email dated March 24, 2023, Carlton Lawrence confirmed that benchmark monitoring for Outfall 003 is not conducted since the benchmark parameters are not included in the online eDMR entry system.

Permit Application and Request for Modification

- Watco provided a hard copy of an Application for Modification of Ohio NPDES Permit. Per Carlton Lawrence, this document was submitted digitally on January 4, 2023. The document requests a change to the compliance schedule and the TSS limit until construction of the stormwater system is complete. The document states:
*“Watco Transloading, LLC (Watco) respectfully request to modify Permit No. IIN00169*GD to extend the current 27-month full compliance with final effluent limitations for Outfall IIN00196011 to align with the permit expiration date of 9/30/24...
In addition, Watco request to have the Total Suspended Solids (TSS) limits reevaluated while we continue construction of the stormwater system. The current limit is 50 mg/l and we would like to modify the limit to benchmark monitoring until construction is complete and the system is fully functional.”*
- Watco provided a hardcopy of the NPDES permit application, signed July 13, 2018. The permit requested coverage for six outfalls; 002, 003, 005, 009, 006, and 007. Per an email from Carlton Lawrence on March 22, 2023, the Outfalls 002, 003 and 010 are the same as those outfalls in the current permit. Outfalls 005, 006, 007 and 009 were removed during the salt pad improvements in 2018 and were replaced with outfall 011.

Drainage Logs and Stormwater Inspections

- Watco provided hard copies of liquid site containment drainage logs for January 1, 2023, through the date of the inspection, and digital copies of drainage logs for the calendar years 2021 and 2022. The logs are a requirement of the Spill Prevention Containment and Countermeasures (SPCC) Plan. The logs include the dates and times when the containment valves are opened to release accumulated stormwater. The logs include a column for containment area. The midland containment is associated with outfall 003. HVC 1 refers to the valve which controls the flow in the pipe which is monitored as Outfall 002. HVC 2 is the valve which controls the flow to another pipe, located in the same manhole as Outfall 002, but is not monitored as an NPDES outfall.

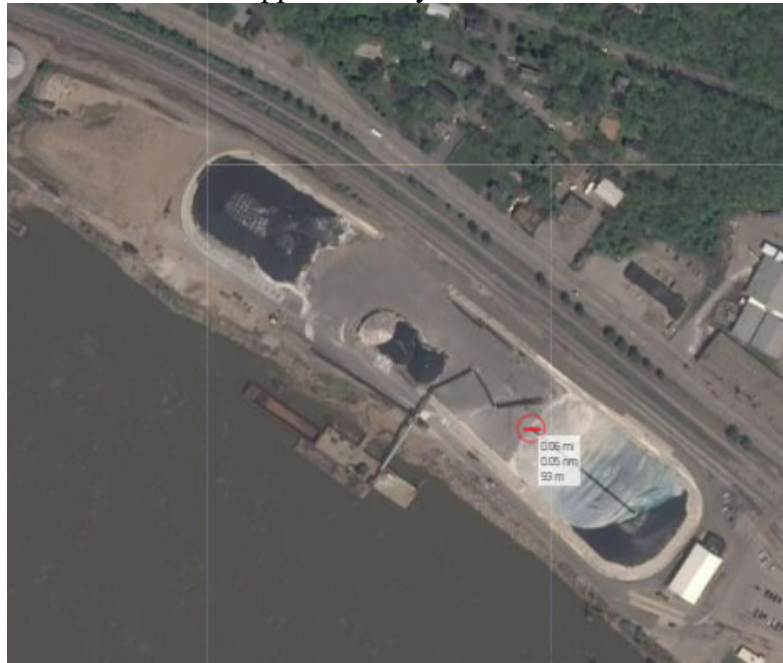
Date of Inspection	Control Measure Is Operating Effectively	Notes
3/30/20	Yes	N/A
6/24/20	Yes	Morton/Compass need repair to tarp due to high wind.
9/25/20	Yes	N/A
12/8/20	Yes	All Salt Piles Covered
3/25/21	Yes	N/A
6/29/21	No	Covers not on due to added salt to piles
9/24/21	Yes	Not all covered but [illegible] terminal agreement
12/20/21	No	Wind and adding salt to pile
3/25/22	No	Not enough salt to cover at this time.
6/23/22	No	Building both piles currently
9/26/22	Yes	Compass salt covered, Morton Salt not covered.

12/14/22	No	Salt companies know wind has blown tarp off.
2/16/23	No	Very little salt on piles, not enough to cover

- Watco provided copies of the quarterly stormwater controls inspections for the January 2020 through to the date of the inspection. In an email dated March 28, 2023, Carlton Lawrence was asked about three specific dates when the inspections noted the piles were uncovered, and the inspection did not include a description of follow-up maintenance activities. The dates are:
 - June 29, 2021 – inspection notes the piles are not covered, no maintenance, repair or replacement documented.
 - December 20, 2021 – inspection notes the piles are not covered, no maintenance, repair or replacement documented.
 - June 23, 2022 – inspection notes the piles are not covered, no maintenance, repair or replacement documented.

Carlton Lawrence confirmed in the March 28, 2023 email that documentation is not available for the maintenance activities taken to address the uncovered salt pile on these three dates.
- A review of aerial images from the DigitalGlobe service showed three dates when the uncovered portion of the salt pile exceeded 150 feet. Screenshots of those three dates are included with measured estimates of salt pile storage on the following dates
 - April 22, 2020
 - November 3, 2020
 - July 5, 2021

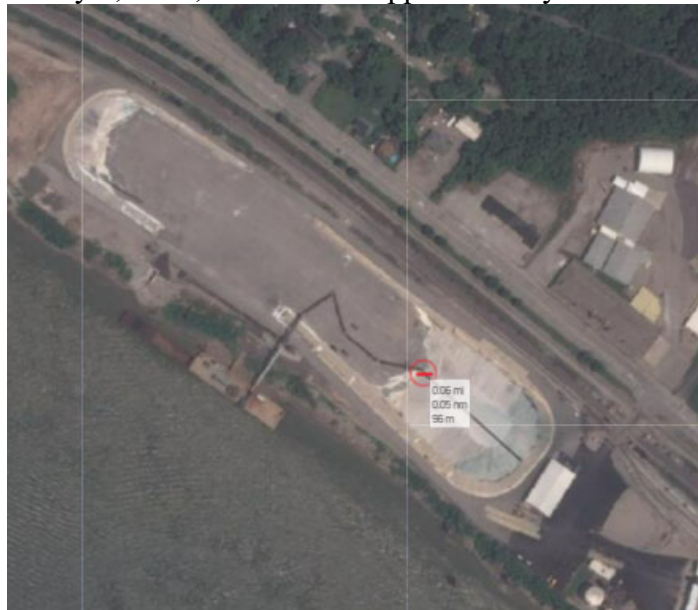
April 22, 2020 – 93 Meters is approximately 305 feet.



November 3, 2020, 76 meters is approximately 250 feet.



July 5, 2021, 96 meters is approximately 315 feet.



- In an email dated March 28, 2023, Carlton Lawrence confirmed that the conditions shown in the July 5, 2021 aerial were caused by high winds on July 5, 2021, and were corrected on July 15, 2021. He also confirmed that Watco does not have the ability to place or replace covers or tarps on the salt piles. The salt pile covers are the responsibility of Watco's customers.

Facility Walkthrough

USEPA staff made the following observations during the Facility walkthroughs, further documented in the Photograph Log (attached):

- EPA observed a roll off container stored outside of containment and in an area where runoff is tributary to the Ohio River. The roll off container was located southeast of the truck wash. Photos 8 through 12 show the contents of that dumpster which included crushed drums used to store oil. Before the end of the inspection, the facility relocated the roll off container to inside the truck wash containment, which is tributary to a blind tank with no outlet. The relocated container location is shown in photo 35.
- Monitoring for Outfall 002 occurs inside a manhole located between the loading rack and the liquid storage tanks. The inside of the manhole is shown in photo 7, with north shown up in the photo. There are two white plastic pipes, one on the north side of the manhole and a second on the south side. Per Carlton Lawrence and Rodney Hamilton, the white pipe on the north side of the manhole comes from the northeast side of the liquid storage area, also known as HVC 1. The north white pipe is the pipe sampled for compliance for Outfall 002. The white pipe on the south side of the manhole is for drainage of the southwest half of the liquid storage area, also known as HVC 2, and is not monitored for NPDES compliance purposes. The clay-colored pipe on the east side of the manhole is no longer used and, per Rodney Hamilton, does not flow.

At the bottom of the manhole there was water flowing from the north to the south. Carlton Lawrence thought that this was offsite flow from a storm sewer which was associated with the rail road property located north of the Watco facility. Per Rodney Hamilton, this water is not sampled.

- The inlet shown in photo 18 goes to an onsite sewer system tributary to outfall 011. At the time of the inspection there was filtersock surrounding the inlet, and a filter hat inside the inlet. There was a small rip forming along the upper edge of the hat.
- There were straw bales at locations of concentrated storm water flow. At one location shown in photo 22 the bale was loose, and another location shown in photo 24 the bale had begun disintegrating with loose straw visible on the surrounding pavement as shown in photo 25.
- A small pile of sand was present adjacent to the slope leading down to the river, and shown in photo 26. At the time of the inspection there was a filter sock surrounding the pile, but sand could be seen on the pavement downstream of the filter sock. Per Mike

Beatty this pile is wash sand and is used under a tank floor when the floor is repaired or replaced.

- Northwest of the salt pile pad is a soil pile which is part of an ongoing project to install a tank for managing the wastewater discharge at outfall 011. At the time of the inspection, a portion of the soil pile was sparsely vegetated, and portion of it was not vegetated as shown in photo 29. There was also a filter sock surrounding the toe of the pile adjacent to the river.
- The approximate location of Outfall 012 is shown in photo 30. This is a location where stormwater flows off the north end of the site and into the river. At the time of the inspection there were no BMPs visible at this location and sediment was visible on the pavement leading to the bank to the river.
- There is a small area of pavement tributary to a black corrugated pipe leading to the river. The area is located beneath the salt conveyor used for unloading barges. This pipe is shown in photo 31 and 34. There were no visible BMPs present at this location at the time of the inspection, and this pipe and drainage area is not shown on the maps associated with the SWPPP.

Field Monitoring

USEPA staff conducted field monitoring using an AT-600 manufactured by In-Situ Inc serial number 692432. The AT-600 included a pH probe, and a temperature/specific conductivity probe. A calibration was conducted in the morning on February 22, 2022. A three point pH calibration with 4.00, 7.00 and 10.00 standards, a specific conductivity calibration with a 12,880 uS/cm. Two measurements were taken on February 24, 2023 with the meter, the first at a manhole immediately upstream of Outfall 011, and the second in a pool of water located immediately below Outfall 011. Time stamps are in the central timezone.

Time	Description	Lat	Long	Sp. Cond. (uS/cm)	pH
9:26 a.m.±	Manhole immediately upstream of outfall 011	39.095673	-84.6554017	30,646.83	7.74
9:29 a.m.	Small pool immediately below outfall 011.	39.09530	-84.655647	30,424.94	7.79

Closing Conference

A closing conference was held on February 24, 2023, USEPA staff relayed preliminary areas of concern to Watco's environmental staff.

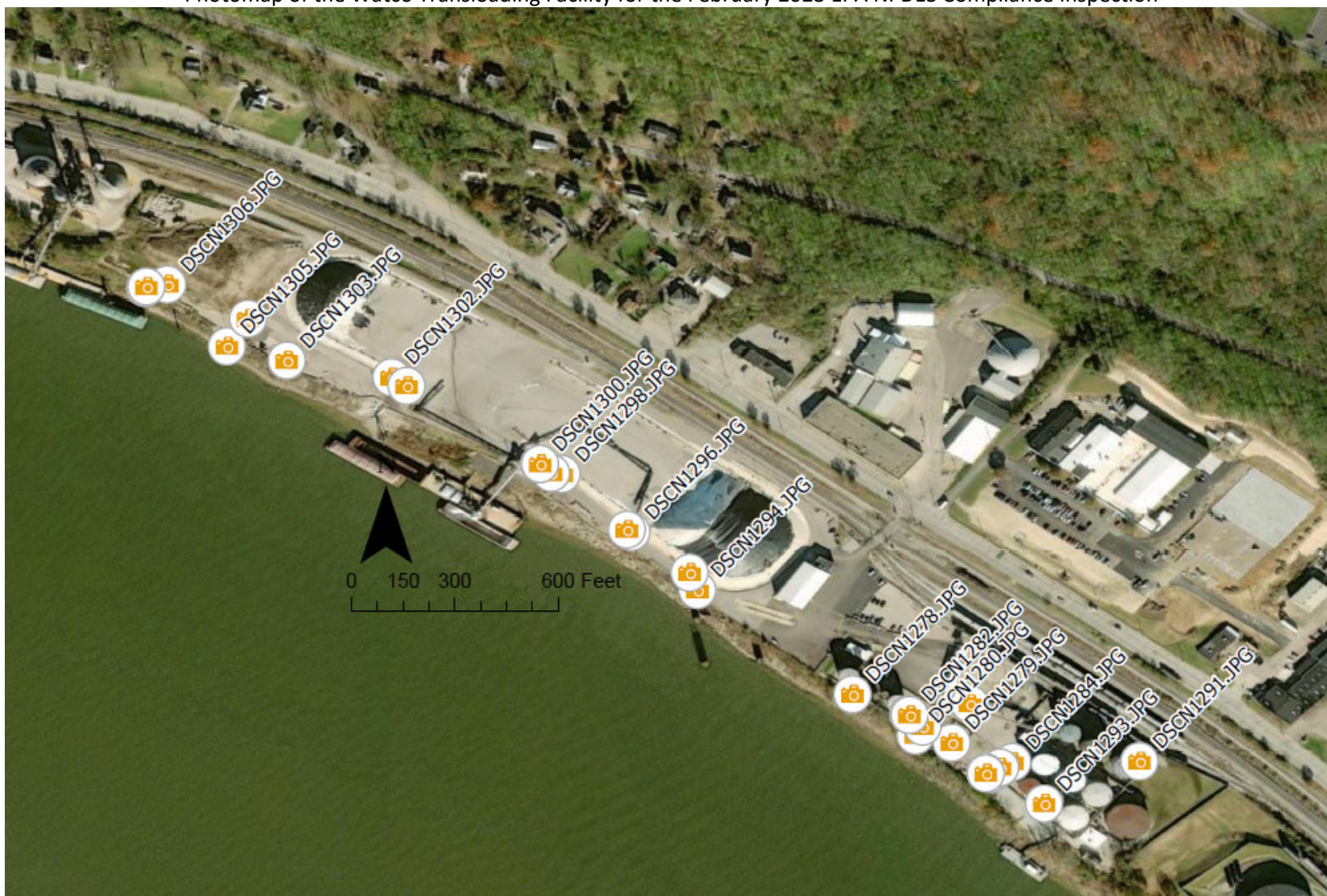
USEPA concluded the inspection and left the Facility on February 24, 2023. Carlton Lawrence provided copies of digital records via emails on the following dates:

- February 23, 2023,

- February 24, 2023,
- February 27, 2023,
- March 3, 2023,
- March 20, 2023,
- March 22, 2023,
- March 27, 2023, and
- March 28, 2023.

Watco Transloading, LLC. Facility In Cincinnati, Ohio
EPA Inspection 2/23/2023 to 2/24/2023.
All photos taken by Jonathan Moody, Environmental Engineer, U.S. EPA
Camera: Nikon Coolpix W300
Timestamp is in the Central timezone
Photos

Photomap of the Watco Transloading Facility for the February 2023 EPA NPDES Compliance Inspection





1: DSCN1278.JPG

Location: Watco Transloading
 Photographer: Jonathan Moody
 Date/Time: 2/23/2023 1:00 PM
 Description: Looking at the valve controlling the discharge at Outfall 003. This is the downstream end of Photo 6.



2: DSCN1279.JPG

Location: Watco Transloading
 Photographer: Jonathan Moody
 Date/Time: 2/23/2023 1:04 PM
 Description: Truck washing pad. There is a drain under the black rubber sheet in this photo. The drain is connected to the plastic tank shown in Photo 3.



3: DSCN1280.JPG

Location: Watco Transloading
 Photographer: Jonathan Moody
 Date/Time: 2/23/2023 1:06 PM
 Description: Tote used to hold the water from the wash rack shown in Photo 2.



4: DSCN1281.JPG

Location: Watco Transloading
 Photographer: Jonathan Moody
 Date/Time: 2/23/2023 1:06 PM
 Description: Tote used to hold the water from the wash rack shown in Photo 2.



5: DSCN1282.JPG

Location: Watco Transloading
 Photographer: Jonathan Moody
 Date/Time: 2/23/2023 1:07 PM
 Description: Sewer in the Midland Containment. Runoff from the loading rack goes into a storm sewer and flows up and out the structure shown in this photo. This area is tributary to Outfall 003.



6: DSCN1283.JPG

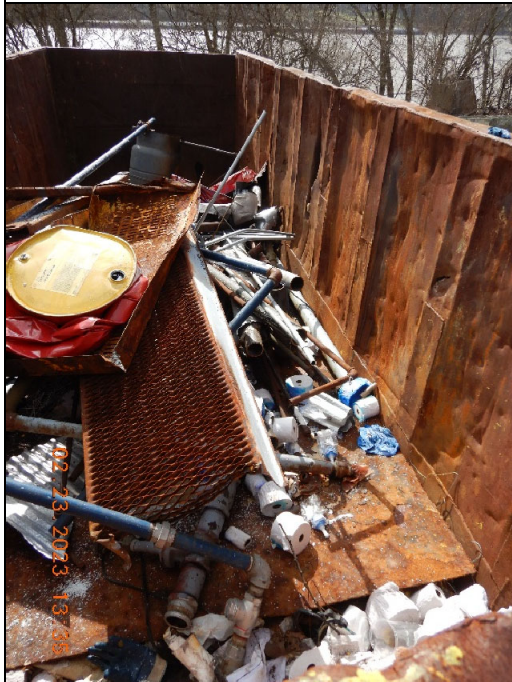
Location: Watco Transloading
 Photographer: Jonathan Moody
 Date/Time: 2/23/2023 1:09 PM
 Description: Water impounded inside the Midland Containment. This is upstream of the valve shown in Photo 1.



7: DSCN1284.JPG

Location: Watco Transloading
 Photographer: Jonathan Moody
 Date/Time: 2/23/2023 1:20 PM
 Description: Looking down, up is north. Location where the samples are collected from Outfall 002. Outfall 002 is plastic white pipe at the north end of the manhole. The clay pipe entering from the east side of the manhole was connected to a valve and drained a portion of the containment located east of the manhole. The second white pipe under the ladder was connected

to another valve which drained a large portion of the containment located to the east of the manhole. This second white pipe is not sampled per the facility representative. At the time of the inspection, water was flowing from the north to the south through the manhole.



8: DSCN1285.JPG

Location: Watco Transloading
 Photographer: Jonathan Moody
 Date/Time: 2/23/2023 1:35 PM
 Description: Looking inside a dumpster stored outside of the containment structures. At the time of the inspection there were two crushed oil drums.



9: DSCN1286.JPG

Location: Watco Transloading

Photographer: Jonathan Moody

Date/Time: 2/23/2023 1:35 PM

Description: Looking inside a dumpster stored outside of the containment structures. At the time of the inspection there were two crushed oil drums.



10: DSCN1287.JPG

Location: Watco Transloading

Photographer: Jonathan Moody

Date/Time: 2/23/2023 1:35 PM

Description: Photo taken by mistake.



11: DSCN1288.JPG

Location: Watco Transloading

Photographer: Jonathan Moody

Date/Time: 2/23/2023 1:35 PM

Description: Close-up of a label on one of the oil drums inside the dumpster stored outside the containment.



12: DSCN1289.JPG

Location: Watco Transloading
Photographer: Jonathan Moody
Date/Time: 2/23/2023 1:37 PM
Description: Close-up of a label on an other oil drum inside the dumpster stored outside the containment. Photo taken through a hole in the sidewall of the dumpster.



13: DSCN1290.JPG

Location: Watco Transloading
Photographer: Jonathan Moody
Date/Time: 2/23/2023 1:41 PM
Description: Looking at the dock on the liquid (south side) of the property.



14: DSCN1291.JPG

Location: Watco Transloading
Photographer: Jonathan Moody
Date/Time: 2/23/2023 1:46 PM
Description: Sump in the southern most containment. The sump pumps stormwater into one of the neighboring containment area.



15: DSCN1292.JPG

Location: Watco Transloading

Photographer: Jonathan Moody

Date/Time: 2/23/2023 1:48 PM

Description: Looking inside the northern liquids containment area. Per Carlton Lawrence, the drain shown in this area leads to the manhole shown in photo 7, where outfall 002 is monitored. Camera is facing east looking along the southside of the northernmost containment wall for the liquids area containment.



16: DSCN1293.JPG

Location: Watco Transloading

Photographer: Jonathan Moody

Date/Time: 2/23/2023 1:55 PM

Description: Camera looking west along the north side of the southernmost containment wall for the liquid area containment. Per Carlton Lawrence, this inlet is tributary to the same manhole in photo 7 where monitoring for outfall 002 is conducted, however, this is likely connected to the white plastic pipe which is not monitored for NPDES compliance.



17: DSCN1294.JPG

Location: Watco Transloading
 Photographer: Jonathan Moody
 Date/Time: 2/23/2023 2:03 PM
 Description: Camera facing northwest, looking along the riverside edge of the salt pile pad.



18: DSCN1295.JPG

Location: Watco Transloading
 Photographer: Jonathan Moody
 Date/Time: 2/23/2023 2:04 PM
 Description: Closeup of the drainage structure visible in photo 17. At the time of the inspection the inlet was surrounded by filter sock and there was a filter 'hat' inside the manhole. The fabric on the hat had a small rip forming near the top.



19: DSCN1296.JPG

Location: Watco Transloading
 Photographer: Jonathan Moody
 Date/Time: 2/23/2023 2:05 PM
 Description: Camera is facing north, at a location along the riverside edge of the salt pile pad. A cut in the concrete berm surrounding the pad allows stormwater to flow from the pad into the collection ditch surrounding the pad. At the time of the inspection, straw bales were placed on the upstream side of the cut.



20: DSCN1297.JPG

Location: Watco Transloading
 Photographer: Jonathan Moody
 Date/Time: 2/23/2023 2:05 PM
 Description: Camera facing east, looking along the riverside edge of the salt pile pad.



21: DSCN1298.JPG

Location: Watco Transloading
 Photographer: Jonathan Moody
 Date/Time: 2/23/2023 2:07 PM
 Description: Looking toward the dock barge on the dry side of the facility. This is the barge used to unload the salt and other dry products.



22: DSCN1299.JPG

Location: Watco Transloading
 Photographer: Jonathan Moody
 Date/Time: 2/23/2023 2:09 PM
 Description: Along the riverside edge of the salt pile pad, straw bales were being used for stormwater BMPs. At the time of the inspection, the twine on the bale had failed and the bale was loose.



23: DSCN1300.JPG

Location: Watco Transloading
 Photographer: Jonathan Moody
 Date/Time: 2/23/2023 2:09 PM
 Description: At a location along the river side of the salt pile pad near the conveyor used to move material from the barge. A rubber sheet is moved over the inlet to prevent salt from entering the onsite collection system.



24: DSCN1301.JPG

Location: Watco Transloading
 Photographer: Jonathan Moody
 Date/Time: 2/23/2023 2:14 PM
 Description: On the salt pile pad, near the northwest corner, straw bales were used as a stormwater BMP. At the time of the inspection, some of the straw bales had come loose and were shedding material.



25: DSCN1302.JPG

Location: Watco Transloading
 Photographer: Jonathan Moody
 Date/Time: 2/23/2023 2:15 PM
 Description: On the salt pile pad, near the northwest corner, straw bales were used as a stormwater BMP. At the time of the inspection, some of the straw bales had come loose and were shedding material. Loose straw was seen around the straw bales.



26: DSCN1303.JPG

Location: Watco Transloading
 Photographer: Jonathan Moody
 Date/Time: 2/23/2023 2:17 PM
 Description: At a location west of the salt pile pad and near the river. This sand was wash sand used under a tank floor when the floor is repaired or replaced. This sand was in an area that was tributary to the river. At the time of the inspection a filter sock was present, but solids were visible downstream of the filter sock.



27: DSCN1304.JPG

Location: Watco Transloading
 Photographer: Jonathan Moody
 Date/Time: 2/23/2023 2:21 PM
 Description: At the monitoring location for Outfall 011. This is the location where compliance monitoring samples are collected.



28: DSCN1305.JPG

Location: Watco Transloading
 Photographer: Jonathan Moody
 Date/Time: 2/23/2023 2:21 PM
 Description: At outfall 011 looking toward the location where the diffuser for 011 has been installed.



29: DSCN1306.JPG

Location: Watco Transloading
 Photographer: Jonathan Moody
 Date/Time: 2/23/2023 2:23 PM
 Description: At the soil pile located west of the salt pile pad. At the time of the inspection, a portion of the pile was sparsely vegetated, there were remnants of a silt fence and an intact filter sock.



30: DSCN1307.JPG

Location: Watco Transloading
 Photographer: Jonathan Moody
 Date/Time: 2/23/2023 2:25 PM
 Description: At the location known as outfall 012. At the time of the inspection, no BMPs were visible at this location, sediment was visible on the pavement. Carlton Lawrence said that monitoring for 012 is not monitored since there is no industrial activity occurring in the area tributary to this outfall.



31: DSCN1308.JPG

Location: Watco Transloading
 Photographer: Jonathan Moody
 Date/Time: 2/23/2023 2:33 PM
 Description: Under the conveyor used to offload dry material, runoff from a small portion of pavement is conveyed toward the river through the pipe shown in this photo. See photo 34 for an overview of the area near this pipe.



32: DSCN1309.JPG

Location: Watco Transloading
 Photographer: Jonathan Moody
 Date/Time: 2/24/2023 9:17 AM
 Description: Closeup of the hat inside the structure shown in photo 18.



33: DSCN1310.JPG

Location: Watco Transloading
 Photographer: Jonathan Moody
 Date/Time: 2/24/2023 9:25 AM
 Description: Looking into the manhole immediately upstream of outfall 011. This is the location of the field monitoring point 01.



34: DSCN1311.JPG

Location: Watco Transloading
 Photographer: Jonathan Moody
 Date/Time: 2/24/2023 9:32 AM
 Description: Looking at the area underneath the conveyor used to offload dry material. The location of the pipe shown in photo 31 is indicated with the red arrow.



35: DSCN1312.JPG

Location: Watco Transloading

Photographer: Jonathan Moody

Date/Time: 2/24/2023 9:37 AM

Description: During the inspection, the dumpster shown in photo 9 was relocated to be inside the truck was pad, which is tributary to the poly tank shown in photo 3.