INSPECTION REPORT

Inspection Entry Date/Time	03/21/2023 09:10 AM (ET)	Announced: No
Inspection Exit Date/Time	03/22/2023 11:30 AM (ET)	Access: Granted
Weather	Cloudy, dry	
Media	Water	
Statute(s)/Program(s)	Clean Water Act, NPDES, Industrial	
Type of Inspection	CEI - Compliance Evaluation Inspection	
Permittee Name	Ohio Coatings Co.	
Facility or Site Name	Ohio Coatings Co.	
Facility/Site Physical Address	2100 Tin Plate Place	
City, State, Zip Code	Yorkville, OH 43971	
County/Borough/Parish	Belmont	
Facility GPS Coordinates	40.14658, -80.70718	
FRS ID	110000735526	
Permit Number(s) (If Applicable)	OH0120588 (effective December 1, 2022 through November 30, 2027)	
SIC and/or NAICS	3312	
Lead Inspector:		
Megan Zale	MEGAN ZALE Digitally signed by MEGAN ZALE Date: 2023.05.30 09:48:22 -04'00'	
	EPA Region 5	zale.megan@epa.gov (440) 250-1711
Supervisor Review:		
Brooke Furio	Furio, Brooke Digitally signed by Furio, Brooke Date: 2023.05.30 10:56:53 -04'00'	
	EPA Region 5	furio.brooke@epa.gov (440) 250-1705

SECTION I – INTRODUCTION

Site Entry and Inspection Objectives

Dave Emerich, Process Control Manager, was out on medical leave during the inspection.

EPA Region 5 Lead Inspector, Megan Zale, arrived at the Ohio Coatings Co. (the "Site" or "Facility"), located at 2100 Tin Plate Place, Yorkville, OH 43971, at 09:10 AM (ET) on 03/21/2023 for an unannounced inspection. EPA Region 5 Lead Inspector presented credentials to Lori Clark and Doug Crow and informed them that this was an EPA Region 5 inspection to determine compliance as authorized by Clean Water Act (CWA) Section 308 and implementing regulations. This report is based on information supplied by Ohio Coatings Co. representatives, direct observations made by the EPA Region 5 inspector, records and reports maintained by the permittee and other information including: photographs taken by EPA Region 5 inspector(s), physical evidence collected by the EPA Region 5 inspector(s), measurements taken by EPA Region 5 inspector(s), verbal or written statements

made by information supplied by Ohio Coatings Co. representatives during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA Region 5 inspector(s) by Ohio Coatings Co. representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or subsequent to the Inspection from a review of EPA, State, and/or public records may be included in this report.

Attendees

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA Region 5	Megan Zale	Lead Inspector	Yes	Yes
EPA REGION 5	Jonathan Moody	Inspector	Yes	Yes
Ohio Coatings	Lori Clark	VP - Commercial	Yes	Yes
Ohio Coatings	Doug Crow	Senior Quality Technician	Yes	No
Ohio Coatings	Dave Emerich	Process Control Manager	No	Yes
Ohio Coatings	Dave Bechtel	Electrical Manager	No	Yes

Facility/Site Description

The EPA Region 5 lead inspector confirmed the following facility information:

Ohio Coatings purchases light gauge carbon steel cold rolled coils and electrolytically tin plates them. The coils are cleaned with NaOH based cleaner, rinsed with reverse osmosis treated water ("RO water"), pickled/cleaned with sulfuric acid based cleaner, rinsed with RO water, tension-leveled, trimmed, then tin plated and rinsed with RO water again. The plating medium is methyl-sulfonic acid. The coils are then chemically treated with sodium dichromate. All RO water rinses drain directly to the wastewater equalization tank and subsequently flows through the wastewater treatment process of neutralization, flocculation with a polymer, clarification, and then liquid flows over weirs to two sand filters, and solids go to a thickener, filter press, and off-site disposal. Clean water from the sand filters flows over a weir and to the final outfall box. The sand filters are a continuous backwash type and the backwash is directed back to the equalization tank. Sodium dichromate chemical treatment wastewater is directed to a chrome rinse equalization tank and then a chrome reduction tank, where it is treated with sodium bisulfite to reduce hexavalent chromium to trivalent chromium. It then flows to the wastewater treatment equalization tank. All coils are stored indoors. The RO water is treated pumped well water. Municipal water is used in the kitchen and laboratory, which flows through a drain system and then to the equalization tank and through wastewater treatment. Blowdown from the facility's cooling towers and the air scrubber goes to the equalization tank and through wastewater treatment. The facility utilizes a 275-gallon quench tank which has a continuous 8 to 10 gallon per minute (gpm) outflow to wastewater treatment during operation. The facility's design flow is 0.094 million gallons per day.

Facility/Site Information

Industrial Sector/Sub-sector	SIC Categories 3312 and 3471
Type of Operation	Electrolytic tin plating of light gauge carbon steel cold rolled coils

Size of Facility	40 acres
Outfalls (and do the numbers and locations match the permit?)	001 and 002. The locations match the permit.
Do you self-monitor and keep monitoring records?	Yes
Do you use in-house or contract out for laboratory analyses? Or both?	Contract out for all permit analyses but do in-house testing for pH and temperature
Have there been or are there plans to make changes in the process(es) that will cause a new, different, or increased discharge?	No

Location(s)

SECTION II – OBSERVATIONS

OHIO COATINGS CO.		
Observation #: MZ2-OB-001	**Date:** 03/21/2023	**Weather:** Cloudy, dry
The designated stormwater effluent pipe outside of the facility had a significant amount of flow on the day of the inspection. Steam could be seen coming from the pipe, which indicated that the flow did not consist entirely of stormwater. It appeared to exit the outfall prior to the diffuser (Photos # 492 through 505). A schematic received from facility representatives showed that a PVC pipe for the facility's wastewater effluent was located within the stormwater pipe and connected to the diffuser.		

OHIO COATINGS CO.		
Observation #: MZ2-OB-002	**Date:** 03/21/2023	**Weather:** Cloudy, dry
There was no wet thermometer in the effluent automatic sampler refrigerator.		

OHIO COATINGS CO.		
Observation #: MZ2-OB-003	**Date:** 03/21/2023	**Weather:** Cloudy, dry
The pH buffers for the effluent sampling probe appeared dirty.		

OHIO COATINGS CO.		
Observation #: MZ2-OB-004	**Date:** 03/21/2023	**Weather:** Cloudy, dry

Some of the wastewater treatment components were located outside. These components were the sludge thickener, clarifier, equalization tank, and cooling towers.

OHIO COATINGS CO.		
Observation #: MZ2-OB-005	**Date:** 03/21/2023	**Weather:** Cloudy, dry
Facility representative Doug Crow stated that a weekly calibration was completed for the effluent pH probe, but the process that was shown to EPA during the inspection was a calibration verification.		

SECTION III – RECORDS REVIEW

EPA requested via email six months of calibration records for the effluent pH probe. The records show that facility personnel record the slope percentage approximately every week. EPA also requested via email the pH probe model and user manual to verify whether the facility was following calibration or verification procedures and did not receive it from the facility representatives.

Water balance numbers shared with EPA by Doug Crow via discussion during the inspection:

Process	Flow rates shared with EPA by facility representative during inspection	Gallons of flow per day (calculated from flow in previous column)
Clean	4 gpm*	5760
Pickel(etch)	5 gpm	7200
plating	6 gpm	8640
Quench	6 gpm	8695
chemtreat	9 gpm	12960
Fume Scrubber	5 gpm	7200
Aux Fume Scrubber	8 gpm	192
cooling towers	4 gpm	5760
RO reject	20000 gal/day	20000
Softeners	100 gal/regeneration**	300
Boilers	125 gal/week	25
	Total	76,732

*gpm = gallons per minute

**gal/regeneration = gallons used per water softener regeneration process

Permit Renewal Application

The facility's most recent NPDES permit renewal application, Ohio EPA form 2C (for the permit effective December 1, 2022 through November 30, 2027), lists the total flow from outfall 001 as 0.091 MGD in Section II. B. It also includes a list of process wastewater to outfall 001. Outfall 002 is not included in the Section II.B. table.

The information contained in Section II does not distinguish the process wastewater volume from the non-contact cooling water and does not include the reject water from the reverse osmosis, softeners, and boilers. Per the information entered in Section II.C. of the form 2C, the 0.091 MGD volume includes the process wastewater and the non-contact cooling water.

The "Fact Sheet Regarding an NPDES Permit To Discharge to Waters of the State of Ohio for Ohio Coatings Company" for the most recent permit (December 1, 2022 through November 30, 2027) includes the statement:

"Non-contact cooling water blowdown contributes 0.005 MGD to outfall 001. As a result of the dilution, NSPS [40 CFR 433.16(c)] require lower limits which are reflected in the calculation for total suspended solids, total cyanide, chromium, and total toxic organics. A ratio of 0.005 MGD to average flow was used: 0.094 MGD yields a 5.3 percent reduction in limits for these parameters."

Based on the information provided by the facility during the inspection, the percentage of the dilutional flow would be the combination of the cooling towers and blowdowns, 26,085 gallon/day (5,760 + 20,000 + 300 + 25) and divided by the total flow, 76,732 gallon/day which is approximately 34%. This is different than the approximate 5% dilutional flow reported in the most recent permit application.

Schematic showing that a PVC pipe for the facility's wastewater effluent was located within the stormwater pipe and connected to the diffuser.

SECTION IV – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

USEPA staff conducted field monitoring using an AT-600 manufactured by In-Situ Inc with serial number 689929. The AT-600 included a pH probe, and a temperature/specific conductivity probe. A calibration was conducted in the afternoon on March 20, 2023, with an In-Situ QuickCal solution for specific conductivity and ORP. A three-point pH calibration was conducted in the morning on March 22, 2023, with 4.00, 7.00 and 10.00 buffer standards. All measurements were taken on March 22, 2023.

Time	Description	Lat	Long	Temp (F)	Sp. Cond. (uS/cm)	pH	ORP (mV)
9:27 AM	Discharge effluent box inside facility, shown in photo DSCN0488.JPG and DSCN0489.JPG.	40.1469617	-80.7103217	79.5	6,359	7.90	-108
9:52 AM	Stormwater outfall (002) shown in photo DSCN0497.JPG	40.1465900	-80.707335	67.5	4,610	8.00	114
9:54 AM	Edge of the Ohio River upstream of the confluence of the conveyance shown in photo DSCN0497.JPG	40.1466483	-80.707090	46.0	300	8.02	152
9:55 AM	Edge of the Ohio River downstream of the confluence of the conveyance shown in photo DSCN0497.JPG	40.1465333	-80.707055	45.1	453	7.79	174

SECTION V - AREA OF CONCERN

Area(s) of Concern may not be in sequential order.

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

AOC Reference #: MZ2-OB-001	

Regulation and/or Permit Requirement

Page 9 of the "Fact Sheet" for the facility's current NPDES permit states: "Outfall 001 discharges treated process wastewaters via a 3-port diffuser (installed in July 2015) to the Ohio River. Outfall 002 discharges only stormwater. The diffuser extends from the final outfall pipe separated from the storm water at outfall 002." Page 14 of the "Fact Sheet" states that the diffuser is used to meet whole effluent toxicity limits.

AOC: At the time of the inspection, there was a significant quantity of flow coming from outfall 002 which is supposed to be the stormwater only outfall. It was not raining at the time of the inspection. Based on field monitoring conducted during the inspection, the temperature and specific conductivity of the water at outfall 002 was similar to the field monitoring parameters at outfall 001. The temperature at 001 was 79.5 fahrenheit and the temperature at 002 was 67.5 fahrenheit which was warmer than the ambient air temperature and the temperature of the river which was approximately 46 degrees fahrenheit. The specific conductivity at outfall 001 was 6,359 uS/cm, the specific conductivity at 002 was 4,610 uS/cm, the specific conductivity in the Ohio River upstream of the confluence was 300 uS/cm.

The designated stormwater effluent pipe outside of the facility had a significant amount of flow on the day of the inspection. Steam could be seen coming from the pipe. It appeared to exit the outfall prior to the diffuser. A schematic received from facility representatives showed that a PVC pipe for the facility's wastewater effluent was located within the stormwater pipe and connected to the diffuser.

AOC Reference #: MZ2-OB-005	

Regulation and/or Permit Requirement

Page 16 of the facility's current NPDES permit: "3. FACILITY OPERATION AND QUALITY CONTROL
All wastewater treatment works shall be operated in a manner consistent with the following:
A. At all times, the permittee shall maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee necessary to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with conditions of the permit.
B. The permittee shall effectively monitor the operation and efficiency of treatment and control facilities and the quantity and quality of the treated discharge."

AOC: Facility representative Doug Crow stated that a weekly calibration was completed for the effluent pH probe, but the process that was shown to EPA during the inspection appeared to be a calibration verification. EPA was unable to determine the manufacturers recommendations for the calibration and verification schedule for the pH probe. EPA requested the probe model number and manual after the inspection from the facility but did not receive it.

AOC Reference #: MZ2-OB-005	
Regulation and/or Permit Requirement: Page 9 of the fact sheet for the facility's current NPDES permit: "Non-contact cooling water blowdown contributes 0.005 MGD to outfall 001. As a result of the dilution, NSPS [40 CFR 433.16(c)] require lower limits which are reflected in the calculation for total suspended solids, total cyanide, chromium, and total toxic organics. A ratio of 0.005 MGD to average flow was used: 0.094 MGD yields a 5.3 percent reduction in limits for these parameters."	
AOC: RO reject is not included in the dilutional flow calculation in the facility's most recent permit renewal application, which created an incorrect water balance. It is also not included as a contributing flow source in section II B of the most recent permit renewal application.	

SECTION VI – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

The EPA Region 5 Lead Inspector held a closing conference with Facility personnel at 11:30 AM (ET) on 03/22/2023 for the inspection. During the closing conference, EPA Region 5 Lead Inspector discussed the observations and Area(s) of Concern identified during the inspection. Observations and Area(s) of Concern have not yet been evaluated for a formal compliance determination.

EPA conducted the closing conference on 3/22/2023 at 10:30 AM. Dave Emerich joined via phone call. EPA stated that there should be a wet thermometer in the automatic sampler fridge where the effluent leaves the plant. EPA also mentioned that the pH buffers for the outfall sampling that were stored near the effluent automatic sampler looked dirty. EPA asked for information about the blue liquid in the floor drain next to the effluent location in the facility and Dave Emerich responded that it was precipitation from chemical testing in lab and that the chemicals from the laboratory go through the drain and to treatment. EPA asked if a pH calibration versus a pH verification is done at the effluent location regularly. Dave Emerich answered that pH is calibrated weekly. EPA asked if drawings were available for the effluent piping to the outfall diffuser system and asked about the apparent effluent flow in the stormwater pipe outside of the black effluent pipe. Dave Emerich verified that the black pipe should be effluent. He said it begins inside the facility. He confirmed that the 3-foot diameter pipe is the stormwater pipe. He said drawings were with the PTI for the installation of the outfall diffuser. He also said both the diffuser and the black stormwater pipe were installed in June 2014. He also said he does not know where the current flow in the stormwater pipe is coming from. He said there is normally no flow in the stormwater pipe on dry days like the day of the inspection.

Follow Up

EPA received an email from Dave Emerich on May 9th, 2023 containing a schematic showing that a PVC pipe for the facility's wastewater effluent was located within the stormwater pipe and connected to the diffuser. The email also stated that the PVC pipe was found dislodged from its position and allowing water to bypass, and that repairs were planned for May 13th, 2023.

EPA received an additional email from Dave Emerich on May 26th, 2023 which contained photos showing repairs made to the diffuser line.

SECTION VII – LIST OF APPENDICES

1. Photo Log

APPENDIX 1: PHOTO LOG

Cleaning process	DSCN0457.JPG	
03/21/2023 10:25 AM	Photographer: Megan Zale	
Facility processing area	No CBI	No PII
Cleaning process. Fume collection is through white pipe or duct, above process		

Cleaning process fume water	DSCN0458.JPG	
03/21/2023 10:25 AM	Photographer: Megan Zale	
Facility processing area	No CBI	No PII
Cleaning process fume water flows here and is then pumped to wastewater treatment		

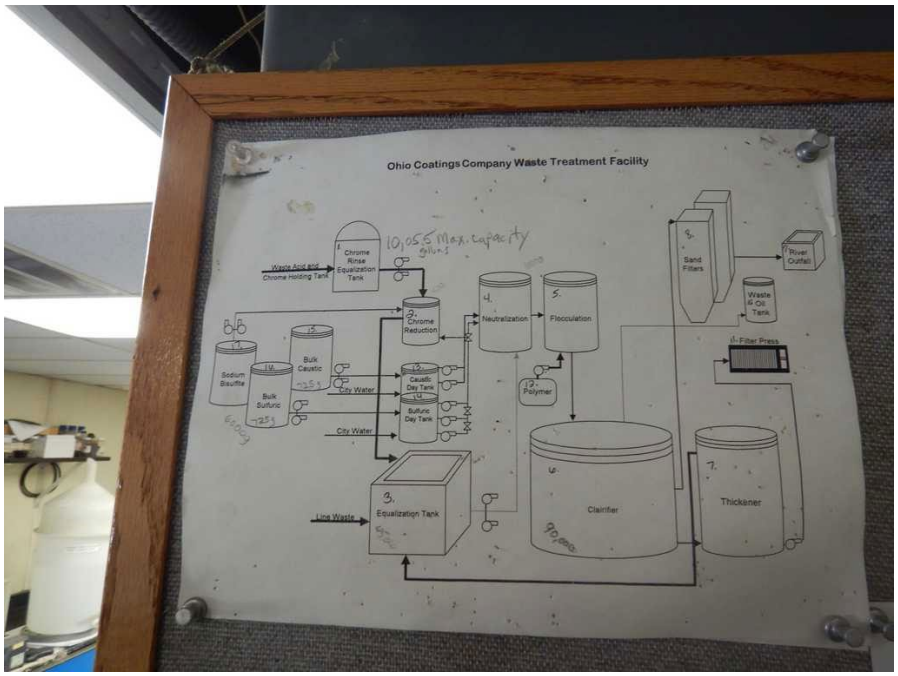
Main fume exhaust	DSCN0459.JPG	
03/21/2023 10:31 AM	Photographer: Megan Zale	
Facility processing area	No CBI	No PII
Main fume exhaust - reverse osmosis treatment occurs where screen is. Wastewater flows out through pipe in bottom left of photo via sump pump (blue) to equalization tank.		

Pumps that spray reverse osmosis water for cleaning	DSCN0461.JPG	
03/21/2023 10:35 AM	Photographer: Megan Zale	
Facility processing area	No CBI	No PII
Pumps that spray reverse osmosis water for cleaning. Drains to sump 1		

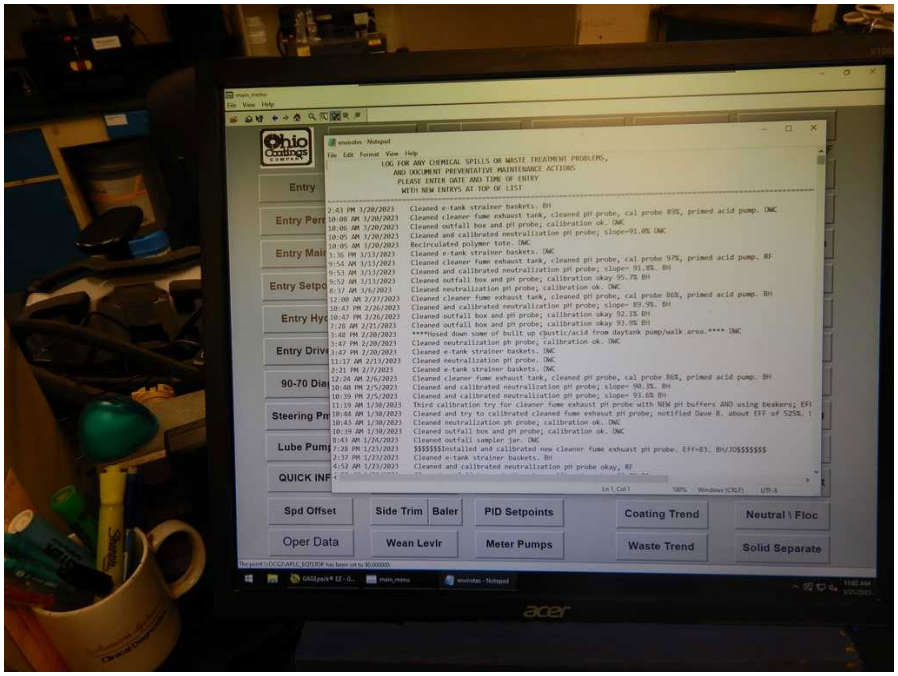
RO Water Pumps After Pickling Station	DSCN0463.JPG	
03/21/2023 10:41 AM	Photographer: Megan Zale	
Facility processing area	No CBI	No PII
Reverse osmosis water pumps after pickling station		

Reverse osmosis rinse after electro-plating	DSCN0465.JPG	
03/21/2023 10:46 AM	Photographer: Megan Zale	
Facility processing area	No CBI	No PII
Reverse osmosis rinse after electro-plating		

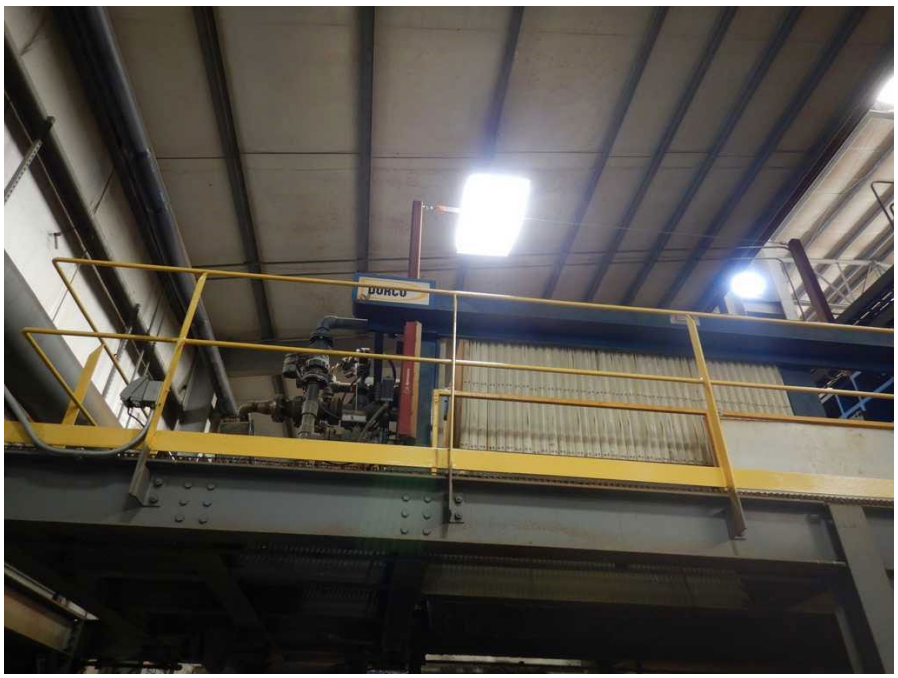
RO rinse after sodium dichromate deposition	DSCN0466.JPG	
03/21/2023 10:51 AM	Photographer: Megan Zale	
Facility processing area	No CBI	No PII
RO rinse after sodium dichromate deposition		



Wastewater treatment process diagram	DSCN0467.JPG	
03/21/2023 10:56 AM	Photographer: Megan Zale	
Laboratory	No CBI	No PII
Wastewater treatment process diagram		



SCADA Log for chemical spills or wastewater treatment issues	DSCN0468.JPG	
03/21/2023 11:00 AM	Photographer: Megan Zale	
Laboratory	No CBI	No PII
SCADA log for chemical spills or wastewater treatment issues		



Sludge Press	DSCN0469.JPG	
03/21/2023 11:11 AM	Photographer: Megan Zale	
Wastewater Treatment Area	No CBI	No PII
Sludge press		

Effluent sampler	DSCN0470.JPG	
03/21/2023 11:12 AM	Photographer: Megan Zale	
Wastewater Treatment Area	No CBI	No PII
Effluent sampler		

Effluent sampler refrigerator	DSCN0471.JPG	
03/21/2023 11:13 AM	Photographer: Megan Zale	
Wastewater Treatment Area	No CBI	No PII
Effluent sampler refrigerator		

Thickener (foreground) and clarifier (background)	DSCN0472.JPG	
03/21/2023 11:17 AM	Photographer: Megan Zale	
Wastewater Treatment Area	No CBI	No PII
Thickener (foreground) and clarifier (background)		

EQ tank on right, cooling towers on left	DSCN0473.JPG	
03/21/2023 11:18 AM	Photographer: Megan Zale	
Wastewater Treatment Area	No CBI	No PII
Equalization tank on right, cooling towers on left		

Clarifier with center well	DSCN0474.JPG	
03/21/2023 11:21 AM	Photographer: Megan Zale	
Wastewater Treatment Area	No CBI	No PII
Clarifier with center well		

Thickener	DSCN0475.JPG	
03/21/2023 11:21 AM	Photographer: Megan Zale	
Wastewater Treatment Area	No CBI	No PII
Thickener (sludge from bottom of clarifier is pumped here)		

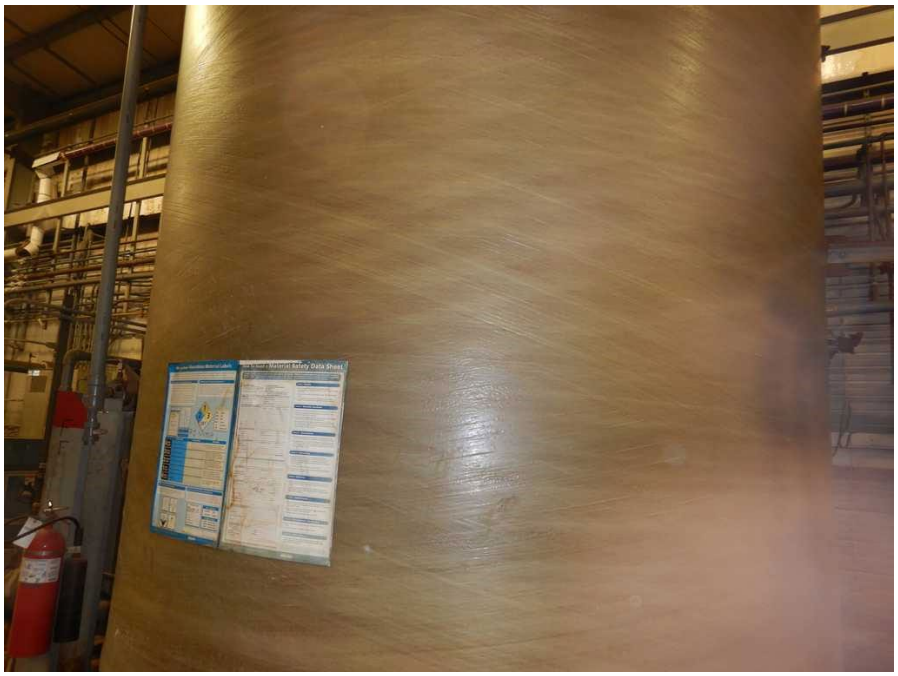
Sand Filters	DSCN0476.JPG	
03/21/2023 11:22 AM	Photographer: Megan Zale	
Wastewater Treatment Area	No CBI	No PII
Sand filters		

Flocculation tank	DSCN0477.JPG	
03/21/2023 11:31 AM	Photographer: Megan Zale	
Wastewater Treatment Area	No CBI	No PII
Flocculation tank		

Neutralization tank	DSCN0478.JPG	
03/21/2023 11:32 AM	Photographer: Megan Zale	
Wastewater Treatment Area	No CBI	No PII
Neutralization tank (NaOH or dilute sulfuric acid added here)		

Chrome reduction tank	DSCN0479.JPG	
03/21/2023 11:36 AM	Photographer: Megan Zale	
Wastewater Treatment Area	No CBI	No PII
Chrome reduction tank (sodium bisulfite used to reduce hexavalent chromium to trivalent chromium)		

Additives	DSCN0481.JPG	
03/21/2023 11:42 AM	Photographer: Megan Zale	
Wastewater Treatment Area	No CBI	No PII
Additives. Contained spill would go to equalization tank.		

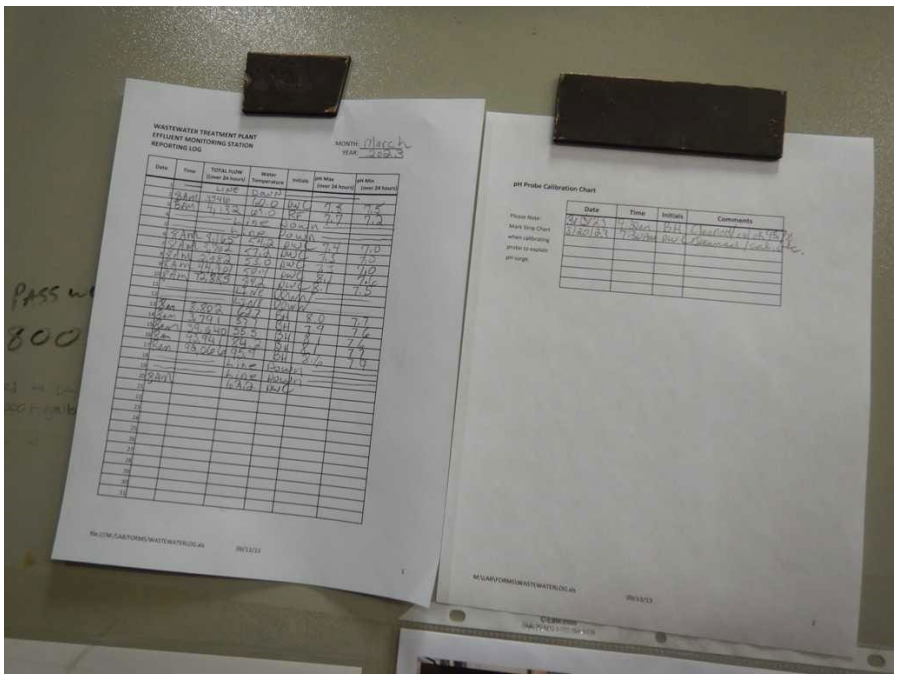


RO tank	DSCN0482.JPG	
03/21/2023 11:43 AM	Photographer: Megan Zale	
Wastewater Treatment Area	No CBI	No PII
Reverse osmosis tank (10,000 gallons)		

Well water tank	DSCN0483.JPG	
03/21/2023 11:43 AM	Photographer: Megan Zale	
Wastewater Treatment Area	No CBI	No PII
Well water tank (10,000 gallons)		

Water softener tanks	DSCN0484.JPG	
03/21/2023 11:44 AM	Photographer: Megan Zale	
Wastewater Treatment Area	No CBI	No PII
Water softener tanks		

Buffers for pH probe calibration at effluent sampler	DSCN0485.JPG	
03/21/2023 11:47 AM	Photographer: Megan Zale	
Wastewater Treatment Area	No CBI	No PII
Buffers for pH probe calibration at effluent sampler		



Log at effluent auto-sampler	DSCN0486.JPG	
03/21/2023 11:48 AM	Photographer: Megan Zale	
Wastewater Treatment Area	No CBI	No PII
Log at effluent auto-sampler		

Effluent flow sensor and temp sensor	DSCN0487.JPG	
03/21/2023 11:59 AM	Photographer: Megan Zale	
Wastewater Treatment Area	No CBI	No PII
Effluent flow sensor (large sensor) and temperature sensor (small sensor)		

Weir for effluent flow monitor	DSCN0488.JPG	
03/21/2023 12:00 PM	Photographer: Megan Zale	
Wastewater Treatment Area	No CBI	No PII
Weir for effluent flow monitor		

Effluent during plant operation	DSCN0489.JPG	
03/22/2023 09:24 AM	Photographer: Megan Zale	
Wastewater Treatment Area	No CBI	No PII
Effluent during plant operation		

Blue liquid in floor drain system near effluent	DSCN0490.JPG	
03/22/2023 09:27 AM	Photographer: Megan Zale	
Wastewater Treatment Area	No CBI	No PII
Blue liquid in floor drain system near effluent		

Blue liquid in floor drain system near effluent	DSCN0491.JPG	
03/22/2023 09:27 AM	Photographer: Megan Zale	
Wastewater Treatment Area	No CBI	No PII
Blue liquid in floor drain system near effluent		

Stormwater outfall on facility grounds	DSCN0492.JPG	
03/22/2023 09:36 AM	Photographer: Megan Zale	
Facility grounds	No CBI	No PII
Stormwater outfall on facility grounds		

Flowing liquid in stormwater pipe	DSCN0493.JPG	
03/22/2023 09:38 AM	Photographer: Megan Zale	
Facility grounds	No CBI	No PII
Flowing liquid in stormwater pipe		

Manhole downstream of first stormwater outfall. Per Dave Bechtel, the black pipe is the water from outfall 001 and goes to the diffuser.	DSCN0495.JPG	
03/22/2023 09:45 AM	Photographer: Megan Zale	
Facility grounds	No CBI	No PII
Manhole downstream of first stormwater outfall		

Significant flow from stormwater outfall pipe. Per Dave Bechtel, the black pipe is wastewater from facility effluent and goes to the diffuser in the Ohio River.	DSCN0497.JPG	
03/22/2023 09:48 AM	Photographer: Megan Zale	
Outfall 001	No CBI	No PII
Significant flow from stormwater outfall pipe		

Significant flow from stormwater outfall (002). Per Dave Bechtel, the black pipe is the wastewater from facility effluent and goes to the diffuser in the Ohio River.	DSCN0498.JPG	
03/22/2023 09:49 AM	Photographer: Megan Zale	
Outfall 001	No CBI	No PII
Significant flow from stormwater outfall		

Effluent from stormwater outfall flowing toward river. Per Dave Bechtel, the black pipe is the water from facility effluent and goes to the diffuser in the Ohio River.	DSCN0500.JPG	
03/22/2023 09:56 AM	Photographer: Megan Zale	
Outfall 001	No CBI	No PII
Effluent from stormwater outfall flowing toward river		

Facing stormwater outfall from river. Outfall 002.	DSCN0501.JPG	
03/22/2023 09:58 AM	Photographer: Megan Zale	
Outfall 001	No CBI	No PII
Facing stormwater outfall from river		

Facing stormwater outfall from river. Outfall 002.	DSCN0502.JPG	
03/22/2023 09:58 AM	Photographer: Megan Zale	
Outfall 001	No CBI	No PII
Facing stormwater outfall from river		

Manhole upstream of stormwater outfall	DSCN0503.JPG	
03/22/2023 10:06 AM	Photographer: Megan Zale	
Facility grounds	No CBI	No PII
Manhole upstream of stormwater outfall		

Stormwater outfall integrator readout	DSCN0504.JPG	
03/22/2023 10:11 AM	Photographer: Megan Zale	
Facility grounds	No CBI	No PII
Stormwater outfall integrator readout		

Stormwater outfall integrator readout	DSCN0505.JPG	
03/22/2023 10:11 AM	Photographer: Megan Zale	
Facility grounds	No CBI	No PII
Stormwater outfall integrator readout - says 0.22 feet per second		