



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

DATE: *November 6, 2024*

SUBJECT: CLEAN WATER ACT INSPECTION REPORT
Heritage Thermal Services, Inc. 1250 St. George Street, East Liverpool, Ohio

FROM: Jonathan Moody, Environmental Engineer
WECAB, Multimedia Section

THRU: Brooke Furio, Section Chief
WECAB, Multimedia Section

BASIC INFORMATION

Facility Name: Heritage Thermal Services, Inc.

Facility Type: Hazardous Waste Treatment and Disposal Facility

NPDES Permit Number: *OH0107298*

Date(s) of Inspection: July 30 through August 1 and August 27, 2024

EPA Inspectors:

1. Jonathan Moody, Lead Inspector
2. Cher Benisek, Multimedia Team Leader

Facility Representatives:

Carrie Beringer, EHS Manager
Johnson Louigene – Environmental Specialist
Dave McPherson – Mechanical Maintenance Manager
Craig Talbot – E&I General Manager
Jon Zoppelt – Senior Engineer

Contact Email Address:

Owner Contact: Heritage Thermal Services, Inc. 1250 St. George Street East Liverpool, OH 43920 330-386-2196	Operator Contact Carrie Beringer EHS Manager 330-386-2196	Physical Facility Address 1250 St. George Street East Liverpool, OH 43920
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Inspection Type: Compliance Evaluation Inspection

Facility Notification:

- ☐ Unannounced Inspection
- ☒ Announced Inspection

Arrival Date and Time: July 30, 2024, 8:30 AM

Departure Date and Time: August 27, 3:15 PM

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet
- ☐ Small Business Resource Information Sheet not provided. Reason:
- ☒ Provided CBI notification to facility

The following information was obtained verbally from Carrie Beringer or Johnson Louigene unless otherwise noted.

Process Description:

Heritage Thermal Services (HTS) is a hazardous waste Transportation, Storage, and Disposal Facility located on the Ohio River in East Liverpool, Ohio. The facility has a single kiln which provides thermal oxidation of hazardous waste. The wastewater generated inside the process areas, used for quenching and emissions control equipment is collected in a sewer system known as Area 'C'.

The facility has four separate sewer systems, and six types of wastewater conveyance areas. Areas 'A', 'B', 'C' and 'D' are described in the NPDES Permit Application, Attachment B.3. Storm water runoff from other areas of industrial activity were not included on the Attachment B.3.

Area 'C' – The description included with the NPDES Permit Application is that Area 'C' is "Active Process Areas", this includes water used in processing areas, including water used in and around the kiln and underroof at the air emissions control, and other areas which the facility has designated "Active Process Areas". All Area 'C' water returns to the C-water tanks. Water from the C-water tanks are consumed in the thermal oxidation process and are not discharged.

Area 'B' – The description included in the NPDES Permit Application is that Area 'B' is "Non-Active Areas, Roadways). The term "Non-Active" is not defined further, but includes roadways and roofs of areas where hazardous waste is managed. It also includes runoff from areas surrounding emissions control equipment and storage of unwashed containers used to storage hazardous waste. Area 'B' sewers collect in sumps located around the facility and are pumped to the three B-water tanks. The water in the B-water tanks can be either discharged through Outfall 602 and subsequent Outfall 003, or it can be sent to the C-water system when there is a need for additional water in the thermal oxidation process.

Area 'A' – The description in the NPDES Permit Application is that Area 'C' is "Roofs and Grassy Areas". Based on a review of the facility sewer drawings and observations made during the inspection, Area 'A' included some pavement and roadway areas, and a cooling water discharge, in addition to the roofs and grassy areas. Area 'A' water drains by gravity to Outfall 003. An automatic valve can shutoff the gravity flow. At the time of the inspection, the valve was not working, and a pneumatic bladder had been located in the sewer upstream of the discharge to act as a shutoff.

Area 'D' – The description in the NPDES Permit Application is that Area 'D' refers to building areas where 'Storm water runoff from roof to collection system 'A' and storm water runoff from under roof to collection system 'C'".

During the inspection, facility personnel referred to the sewer systems as the "dirtiest" water goes to Area 'C', Area 'B' was "cleaner than Area 'C'", and Area 'A' was "clean storm water".

Other areas of industrial activity - Several areas located along the facility's periphery are directly tributary to the Ohio River, these include areas of industrial activity, such as a metal fabrication area, scrap and non-hazardous waste disposal, and haul/access roads for equipment and material storage areas. The locations are further described in the Areas of Concern section.

Sanitary Wastewater – The facility has an authorization from the City of East Liverpool to discharge sanitary and reject water from a softening system and a boiler blowdown. Per the line diagram included with the NPDES Permit Application, the facility has the ability to send the

softener reject water and the boiler blowdown to the B-water tanks. At the time of the inspection, the softener reject and boiler blowdown were discharging to the sanitary sewer.

There is a wastewater treatment system located in a building call the Waste Water Treatment Building. The system has never been used, and was not in use at the time of the inspection.

Staff Interview(s): See the Areas of Concern section for additional comments from facility personnel present during the inspection.

FACILITY WALK-THROUGH OCCURRED:

Yes

Data Collected and Observations:

All observations and collected data are included in Areas of Concern section below.

Photos and/or Videos: were taken during the inspection.
See Appendix B

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

List of Records Reviewed Onsite:

See Appendix C for a list of all documents provided and reviewed for this inspection.

CLOSING CONFERENCE

- ☒ Provided EPA point of contact to the facility.
- ☒ Explained Inspection Report Process
- ☒ Confirm CBI status at end of closing conference. No CBI claimed.
- ☒ Discussed Preliminary Area(s) of Concern

Areas of Concern:

1. **NPDES Permit OH0107298 Part III. 7. Records Retention.** *"The permittee shall retain all of the following records...F. Records of all data used to complete the application for this permit for a period of at least three years, or five years for sewage sludge, from the date of the sample, measurement, report, or application. "*

A complete copy of the final NPDES permit application for the current NPDES permit could not be located. Neither Ohio EPA, nor HTS were able to find a complete copy of the permit application. Multiple versions of the general form and the line diagram (requirement of Form 2C Section II.A.) were provided, and are summarized in Appendix C.

EPA received two versions of the one-diagram. One version, named "PermitAppOnlineSNE_BIZHUBC24072409280.pdf" was provided by Ohio EPA, and was dated August 27, 2014. The other version was a hardcopy provided to EPA during the inspection and dated January 15, 2021. Per Johnson Louigene, the 2021 version was the version included with the 2021 NPDES permit application signed by Christopher Pherson on January 1, 2021. Both diagrams show water from 'B' Water Holding Tanks as Boiler Blowdown, Regeneration of water softeners, Cooling Water and 'Paved Areas'.

2. Locations of industrial activity and storm water catchments were not consistent with the NPDES Permit Application. The "Stormwater Collection Areas" Attachment B.3 to the January 19, 2021, version of the NPDES Permit Application shows the approximate locations of Area 'A', Area 'B' and Area 'C' sewer sheds. A comparison of the Attachment B.3 to the Area 'A' sewers (VonRoll C-01-1-00009/10/11/12) , the Area 'B' Sewers (VonRoll C-03-1-00002/3) noted several inconsistencies:
 - a) Attachment B.3 from the NPDES Permit shows a portion of the roof of the north half of the Truck Holding and Sampling Area, located south of the administrative building, as being tributary to Area 'A' and the south portion, as being tributary to Area 'C'. Per the notes in Attachment B.3, the 'D' designation is *"storm water runoff from roof to collection system 'A' storm water runoff from under roof to collection system 'C'."* The NPDES Permit also shows the open pad immediately south of the Truck holding and Sampling Area, as tributary to an Area 'B' sewer. An excerpt of this portion of the Attachment B.3 drawing is included in Figure 1 below.

The Area 'A' sewer drawing (VonRoll C-01-1-00009 and 11) shows all downspouts from the Truck Holding and Sampling Area are connected to the Area 'A' sewer and the inlet in the paved area south of the Truck Holding and Sampling Area is also connected to the Area 'A' sewer also. An excerpt of that drawing is included in Figure 3 below. Copies of the Area 'C' sewer could not be located. Figure 2 shows an excerpt of the Area 'B' sewer system which shows a roadway collection sump south of the concrete storage pad, but does not show the drainage, nor the inlet in the concrete pad as being connected to the Area 'B' sump. The concrete pad located south of the Truck Holding and Sampling Area is used to store salt for the water softening system.

The NPDES permit application indicates the concrete storage pad is tributary to Area 'B', but the drawings show the pad is connected to an Area 'A' sewer. The permit application drawing also shows that there is a portion of the roof which is tributary to an Area 'C' sewer, but that condition is not consistent with the available drawings, nor the site conditions at the time of the inspection. The figures on the next page show excerpts from Attachment B.3, Area 'A', and Area 'B' sewer drawings. The green square represents the approximate extent of the concrete storage pad. The yellow highlighting shows the locations of the relevant designations and appurtenances.

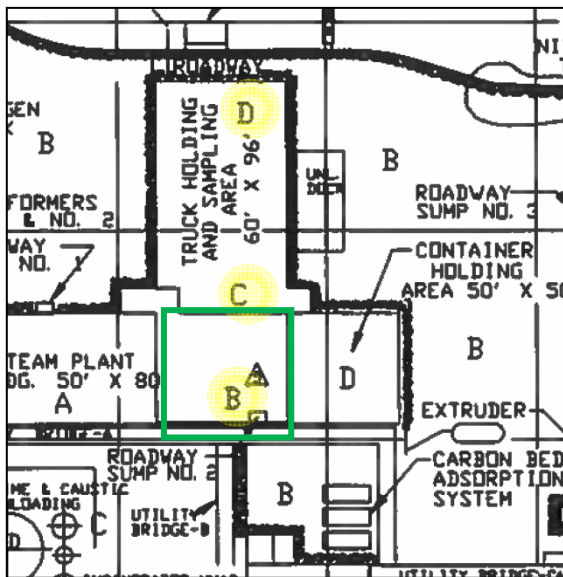


Figure 1: Attachment B.3 from the NPDES Permit Application

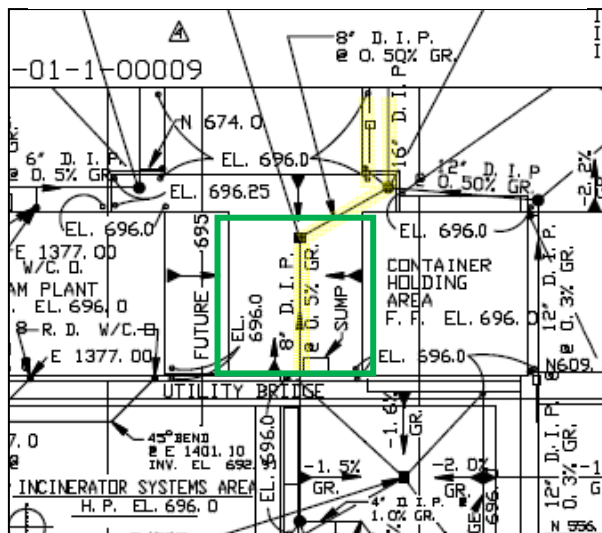


Figure 3: Excerpt from drawing C-01-1-00011 of the Area 'A' sewer. Yellow highlight is Area 'A' sewer

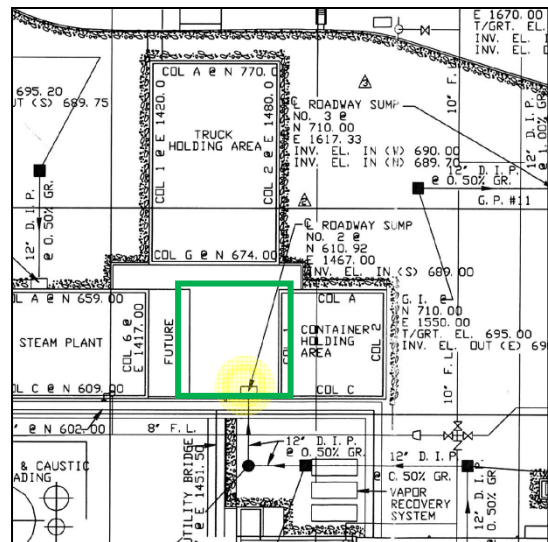


Figure 2: Excerpt from drawing C-03-1-00002, Area 'B' sewers. Yellow highlight is a roadside sump.

- b) Attachment B.3 from the NPDES Permit Application shows a berm located along the southern edge of the facility and between the incinerator and emissions control facilities and the Ohio River.

At the time of the inspection, there was no berm present, nor curb, and the pavement along the southern edge of the facility was pitched toward the Ohio River. The drawing excerpt (Figure 4) below is from the NPDES Application, the arrow shows the approximate location of the photo (Figure 5), included below, taken during the EPA inspection. At the time of the inspection a condensate drain was draining across the pavement, and toward the Ohio River.

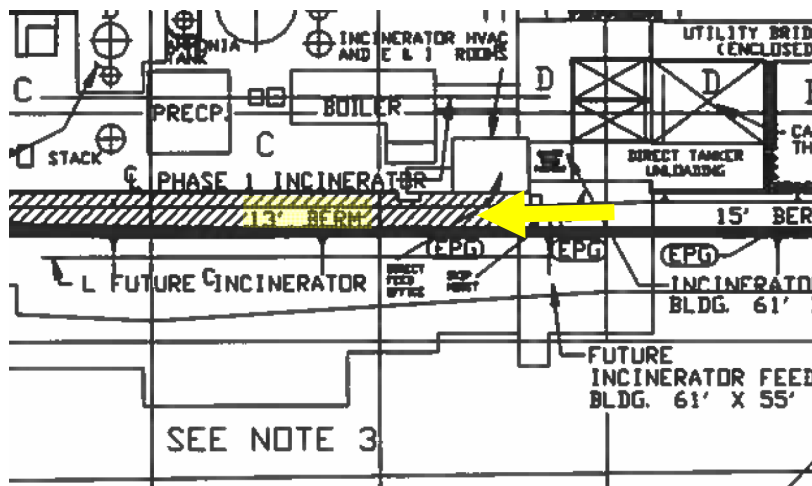


Figure 4: Excerpt from Attachment B.3 from the NPDES Permit Application



Figure 5: Photo from inspection, water was flowing from right to left across the pavement toward the Ohio River seen in the background

- c) Attachment B.3 from the NPDES Permit Application does not show the location of the metal fabrication area known as 'Brass Alley'. The drawing excerpt (Figure 7) below is from the NPDES Application, the yellow rectangle is the approximate location of 'Brass Alley' as shown on a recent aerial (Figure 6), provided below.

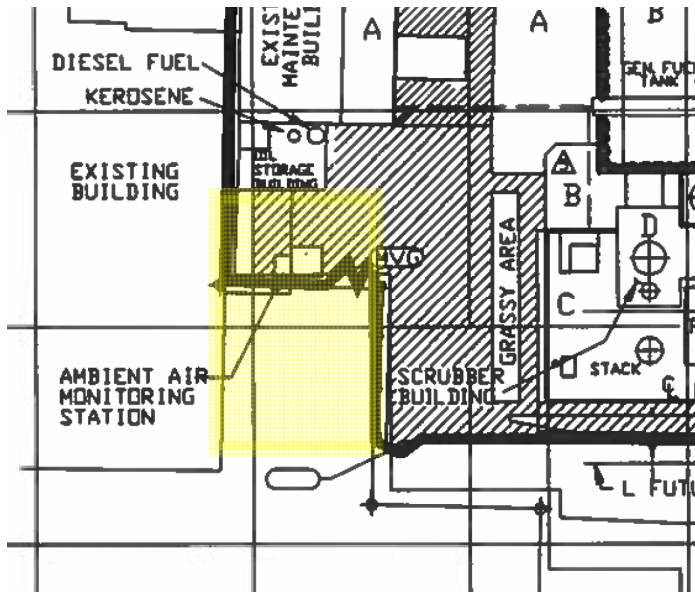


Figure 7: Excerpt from Attachment B.3 of the NPDES permit application. Yellow highlighting is the approximate location of 'Brass Alley'



Figure 6: Aerial of the site, yellow highlighting is the approximate location of 'Brass Alley'

3. **The NPDES Permit Application does not include complete information about operations tributary to Outfall 602 and Outfall 003.** No version of the NPDES Permit Application included complete information about Outfall 003. Both Outfall 003 and 602 are listed in Form 2C, Section I., however only Outfall 602 is listed in section II of General Form 2C, which includes a description of the tributary operations, average flow and treatment.

Section II. B. of the NPDES Permit Application instructions state *“For each outfall, provide a description of: (1) All operations contributing wastewater to the effluent, including process wastewater, sanitary wastewater, cooling water, and storm water runoff; (2) The average flow contributed by each operation; and (3) The treatment received by the wastewater. Continue on additional sheets if necessary.”*

Neither version of the NPDES Permit Application, the 2020 nor 2021 version, includes Outfall 003 in Section II. B. The NPDES Permit Application does not provide a description of any operations contributing flow to Outfall 003.

Both versions of the NPDES Permit Application state the operation contributing flow to Outfall 602 (B Water Tanks) is *“Boiler Blowdown - City water that is passed through the facility and converted to steam for use at the facility”*. Neither version of the NPDES Permit Application include a description of the paved areas. In particular, runoff from two locations, used to store RCRA empty containers which were previously used to store hazardous waste, are not shown on the map in Attachment B.3, nor are they identified on the drawings in the attachments to the NPDES permit applications. These containers have not been washed, and although they are considered empty for RCRA purposes, still contain residual material and are a potential source of pollution.

Neither the permit application, nor the line drawings provide a description of ‘Paved Areas’ nor a description of the materials and industrial activities occurring in Area ‘A’ and Area ‘B’.

Section II.C. of the NPDES Permit Application instructions state *“Except for storm runoff, leaks, or spills, are any of the discharges described in Items II-A or B intermittent or seasonal?”*

Both versions of the NPDES Permit Application, the 2020 and the 2021 version, check ‘No’ under section II. C. indicating that there are no intermittent discharges. The discharge from the B Water Tanks is a batch discharge. The

water in the tanks does come from storm water runoff collected from Area 'B' locations. However, the water from the B Water tanks does not run off the site, it is collected, and pumped to holding tanks prior to an intermittent batch discharge. These batch discharges are each approximately 170,000 gallons and are discharged over an approximate 12-hour period based on the times and flow calculations included in the B Water Tank Discharge Records.

Form 2C, Section II.A. of the NPDES Permit Application requires a *"line drawing showing the water flow through the facility. Indicate sources of intake water, operations contributing wastewater to the effluent, and treatment units labeled to correspond to the more detailed descriptions in Item B."* Both versions of the NPDES application, the version signed in 2020 and the version signed in 2021, do not include Outfall 003 in Section II. For Outfall 602, both versions show an average flow rate of 0.035 MGD, and do not include the information for an intermittent flow for Outfall 602, which is a batch discharge from the B-water storage tanks.

4. NPDES Permit OH0107298 Part IV. J. Contents of SWPPP 2. Description of Potential Pollutant Sources

"You shall document at your facility where industrial materials or activities are exposed to storm water and from which allowable non-storm water discharges are released. Industrial materials or activities include, but are not limited to: material handling equipment or activities; industrial machinery; raw materials; industrial production and processes; and intermediate products, by-products, final product or waste product. For each area identified, the description shall include, at a minimum:

a. Site Description. Your SWPPP shall include:

- i. A description of the industrial activities at your facility;*
- ii. A general location map (e.g. U.S. Geologic Survey (USGS) quadrangle map) with enough detail to identify the location of your facility and all receiving waters for your storm water discharges.*
- iii. A site map showing:*
 - ...*
 - Directions of storm water flow (use arrows);*
 - Locations of potential pollutant sources identified under Part IV J. 2.b;*
 - Locations of storm water inlets and outfalls, with a unique identification code for each outfall (e.g. Outfall 001, Outfall 002, etc), indicating any outfalls that are considered substantially identical to another outfall, and an approximate outline of the areas draining to each outfall;*

b. Inventory of Exposed Materials. This includes a list of industrial activities exposed to storm water (e.g., material storage; equipment fueling, maintenance, and cleaning;

cutting steel beams). This also includes a list of the pollutant(s) or pollutant constituents (e.g, crankcase oil, zinc, sulfuric acid, and cleaning solvents) associated with each identified activity. The pollutant list shall include all significant materials that have been handled, treated, stored, or disposed, and that have been exposed to storm water in the three years prior to the data you prepare of amend your SWPPP.”

No control measures/Best Management Practices (BMPs) are included in the SWPPP, nor were they visible at the time of the inspection. Additionally the Site Map on page 11 of the SWPPP does not show the locations of all exposed materials present during the EPA inspection.

An annotated copy of the SWPPP Site Map is included in Figure # below. The yellow circles note the locations of potential sources of pollutants which were not included in either the SWPPP Site Map, nor in the NPDES Permit Applications. These locations are:

a) Metal Fabrication “Brass Alley” which is tributary to the Ohio River. Jonathan Moody observed metal cutting equipment (Photo 28), and a dumpster (Photo 24) present in this area, as well as staining on the concrete (Photos 27-29) and a residual amount of water on the river side of the dumpster with a flow pattern toward the Ohio River (Photo 30). The refueling area associated with “Brass Alley” appears in the SWPPP which appears to be tributary to the Area ‘A’ sewers. The majority of “Brass Alley” including the metal fabrication (Photo 28), laydown (Photo 26), and dumpster (Photos 25) were not included in the SWPPP, nor the NPDES permit application.

b) Paved access road, adjacent and to the south of the open sided hazardous waste management building. This access road is tributary to the Ohio River. Jonathan Moody observed a condensate drain flowing across this roadway toward the Ohio River, the concrete in this location was stained with a wheel pattern (Photo 1). The pavement was adjacent to a portion of the building housing the incinerator and an open-sided construction housing emissions control equipment and the emissions stack. The drawings included with the NPDES permit applications and the drawings of the original facility grading plan (VonRoll C-01-1-00011 Rev 4) show a large earthen berm constructed in the location of this access road. The berm, nor curbing, was present at the time of the inspection.

c) Material and equipment storage, open sided storage areas and access road, outside of Area ‘A’ and Area ‘B’ Tributary. These structures contained kiln materials and process equipment as shown in Photos 6-10. Some material was stored in front of the structure and outside of the roofline (Photo 7). This area was not in the sewer shed for Area ‘A’(VonRoll C-01-1-00009/10/11/12), nor

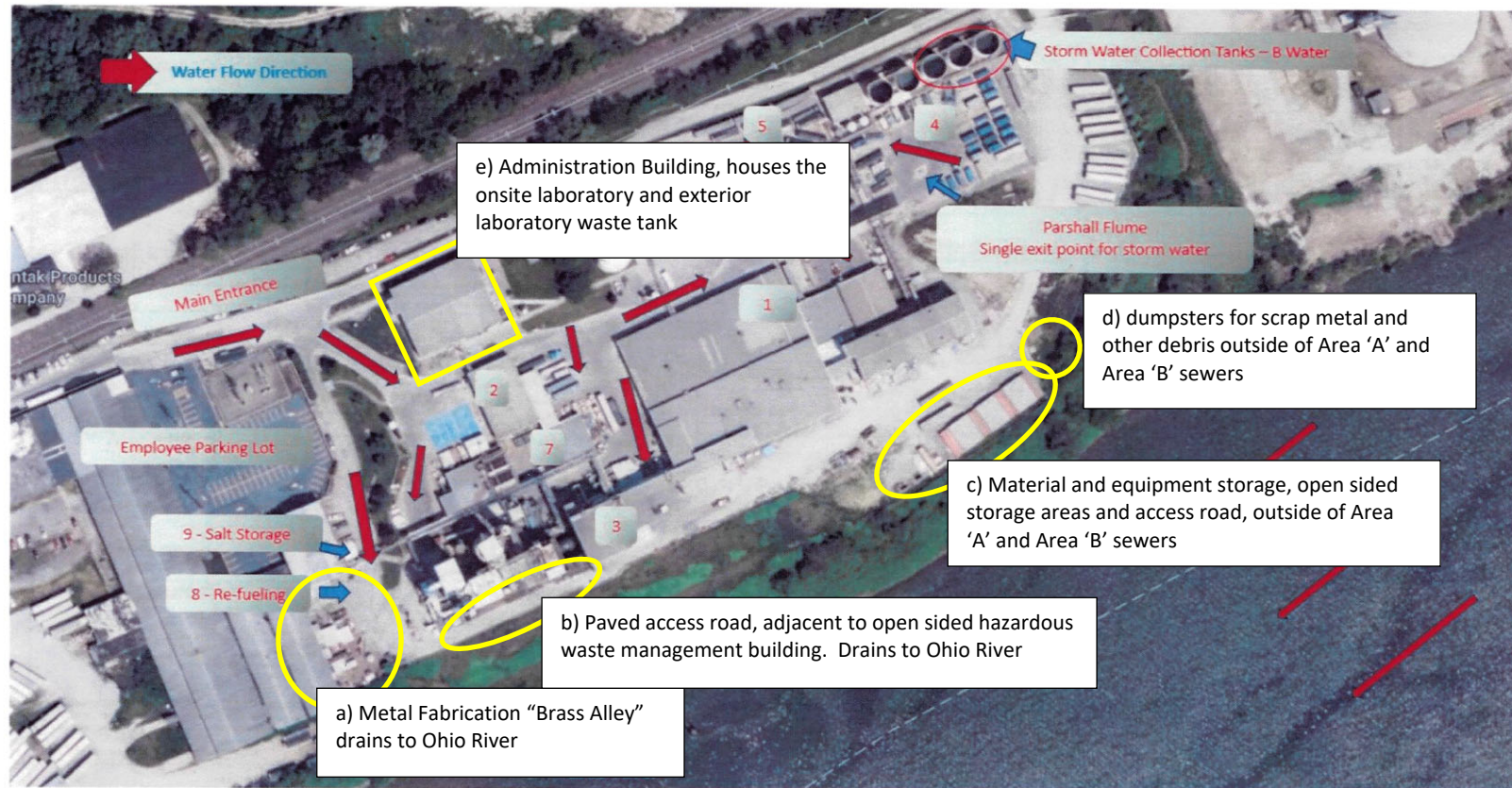
Area 'B' (VonRoll C-03-1-00002/3) as shown on the sewer drawings provided by HTS. These structures and material storage were not shown on the SWPPP and were not included in the NPDES permit application.

d) Dumpsters for scrap metal and other debris outside of Area 'A' and Area 'B' sewer sheds. Per Jon Zoppelt, at the time of the inspection these dumpsters were being used for both facility related debris and construction debris. See Photos 11-13.

e) Administration Building has offices for the HTS staff. The laboratory, used for analyzing wastewater and process materials, is also located in the Administrative Building along with an exterior wastewater holding tank used for wastewater from the laboratory.

The aerial on the next page, labeled "Figure 3 – Site Map /Exposed Activity Locations" is annotated in yellow showing the locations described above.

Figure 3- Site Map/Exposed Activity Locations



See descriptions below.

This is Figure 3 the Site Map from the SWPPP – Yellow annotations are EPA’s observations made during the August 2024 Inspection

5. NPDES Permit OH0107298 Part IV. E. Inspections 1. Routine Facility Inspections.

“Conduct routine facility inspections of all areas of the facility where industrial materials or activities are exposed to storm water, and of all storm water control measures used to comply with Part IV. Items A-C conditions contained in this permit. Routine facility inspections shall be conducted at least quarterly.”

The SWPPP did not contain copies of Routine Facility Inspections. Page 8 in the SWPPP refers to Section F, which contains “Procedures to Prevent Hazards”. The version of SWPPP provided at the time of the inspection did not contain a “Section F” and did discuss a procedure or schedule for routine facility storm water inspections and did not contain copies of previous routine facility inspections.

6. NPDES Permit OH0107298 Part IV. E. Inspections 2 Quarterly Visual Assessment of Storm Water Discharges. a. Quarterly Visual Assessment Procedures

“Once each calendar quarter for the entire permit term you shall collect a storm water sample from Outfall 3IN00170003 and conduct a visual assessment of each of these samples...”

- *On samples collected within the first 30 minutes of an actual discharge from a storm event. If it is not possible to collect the sample within the first 30 minutes of discharge, the sample shall be collected as soon as practicable after the first 30 minutes and you shall document why it was not possible to take samples within the first 30 minutes. In the case of snowmelt, samples shall be taken during a period with a measurable discharge from your site; and*
- *For storm events, on discharges that occur at least 72 hours (3 days) from the previous discharge. The 72-hour (3-day) storm interval does not apply if you document that less than a 72-hour (3-day) interval is representative for local storm events during the sampling period. If it is not possible to collect the sample on discharges that occur at least 72 hours (3 days) from the previous discharge, the sample shall be collected as close to this storm interval as practicable and you shall document why it was not possible to take samples from a 72-hour (3 day) storm interval.”*

Section 5.0 from the SWPPP, under the “Quarterly Visual Assessment” section states *“Storm water B is not discharged directly to the outfall. All storm water B is collected and stored in tanks until it can be tested for requirement in accordance with the NPDES permit.”* Under the “Storm Water Monitoring” Section, the SWPPP states *“Outfall OIN00170003 will be monitored for numeric effluent limit as identified in Part I of the NPDES permit.”* No Quarterly Visual Assessments were included for Outfall 003, nor any of the other areas of potential storm water runoff, such as ‘Brass Alley’. The pH is monitored daily

and there is a permit effluent limit applicable to the pH parameter at Outfall 003. Copies of the daily measurements were provided during the inspection. In addition to pH, several additional parameters are monitored daily at Outfall 003, but there no permit limits associated with these parameters, and the SWPPP does not include criteria for these additional parameters. These parameters include COD, Color, Turbidity, Odor, and TOC.

7. **Ohio Administrative Code. Rule 3745-39-04 (A)(7)(a)** *“For discharges composed entirely of storm water, that are not required by paragraph (A)(1) of this rule to obtain a permit, operators shall be required to obtain an Ohio NPDES permit if any of the following apply:*
...
(ii) The discharge is a storm water discharge associated with small construction activity pursuant to paragraph (B)(14) of this rule.”

The area of disturbance for the construction project for the new shredder building was larger than 1 acre and the facility did not obtain coverage for an Ohio Construction Storm Water Permit. The construction plans show the area of disturbance as 0.95 acres, but the plans limit the area of disturbance to the edge of the proposed pavement, which does not include disturbances from grading activities, material staging, vehicle access, stabilized construction entrance, concrete washout nor the dumpsters used for debris disposal. An estimate of the area of disturbance based on aerial photography available at the time of the inspection shows an area of disturbance of approximately 1.6 acres. See the aerial in Appendix A and photos 4 through 19, and 59.

8. At the time of the inspection, the construction site did not have the sediment and erosion control practices specified on the Erosion and Sediment Control Plan, Sheet LD-3, undated from the undated Land Development Plan set available onsite during the inspection. Specifically, the plan included 12” high silt sock surrounding the limits of disturbance. This silt sock was not in place at the time of the inspection. Per Jon Zoppelt a silt fence was present during an earlier phase of the construction but was recently removed because it interfered with concrete pours. At the time of the inspection, silt fence was present at two locations where concentrated flow collected prior to leaving the site. Best practices for storm water BMPs are to limit the use of silt fence to situations where diffuse sheet flow is expected.
9. Flow measurement at Outfall 003 is not consistent with the manufacturer’s recommendations nor with EPA guidance standards. Per the facility representatives, the system uses an ISCO 3010 Ultrasonic Flow Meter recording device. The device is programmed for a secondary measuring device placed on an 18” parshall flume (Primary Measuring Device). The flume itself and the location of depth measurement are not

consistent with the ISCO Open Channel Flow Measurement Handbook, third edition 1989 (ISCO Manual).

A visual observation of the flume, from a distance, showed the construction of a small weir structure upstream of the flume throat, this structure does not appear in the ISCO Manual description of a standard parshall flume, and appeared to be a retrofit. The weir structure will change the depth and flow relationship such that the preprogrammed 18" parshall flume table, used by the ISCO 3010, would not be accurate. See photos 51 through 53.

The depth sensor itself is hanging from the cable, and a mounting bracket is not used. Per the ISCO 3010 Flow Transmitter Installation and Operation Guide, Section 1.3 Ultra Sonic Level Sensor states *"This cable lets you suspend the level sensor by the cable alone over a flow stream in temporary installations. For more permanent installations, a mounting bracket is available to attach the ultrasonic level sensor securely to the mounting surface."* Suspending the sensor by the cable is intended for temporary installations. A permanent installation should use one of the fixing mounting brackets compatible with the level sensor.

Per the ISCO Manual, chapter 4, the flow measurement needs to occur at 3'-2" from the start of the throat, or 2/3 the distance of the converging section, as measured along the lateral slope of the converging section. The total length of the converging section of a standard 18" parshall flume is 4' 9". The flume is located inside of a 4' diameter manhole, and the start of the throat section can either not be seen or is located just outside of the manhole. The depth sensor is located within 1 foot of the inside wall of the manhole, which seems to be located less than 3' from the start of the throat. See Photo 49. The facility was unable to provide drawings of the flume construction to verify the correct placement of the secondary device.

Table 4-2 from the ISCO Manual, has minimum and maximum recommended flow rates for free flow through parshall flumes. The table recommends a minimum flow rate of 112,000 gallons per day for an 18" parshall flume. The flows show in the DMRs for 2024 are regularly less than 112,000 gallons a day, and the average flow from the NPDES permit application is either 31,000 or 49,000 gallons per day, which is less than the minimum recommended flow. A review of the daily flow measurement data provided in the document "DailyFlumeFlowTempmeasurements_2021toInsp.pdf" shows discharges every day in June and July 2024. During those 61 days the volume through the flume was less than 112,000 gallons per day on 47 of those days.

The facility is not conducting calibration on the secondary device (depth sensor). The EPA guidance, from the NPDES Compliance Inspection Manual. 2017 Chapter 6, states that the secondary device needs to be within 10 percent of the primary flow

measurement system. The calibration conducted for 003 (Calibration-PM -003.pdf) and sent in an email to EPA after the inspection, appears to be a system verification check conducted under a zero-flow condition, and is not a calibration on the secondary device. The secondary device is the level sensor itself.

10. NPDES Permit OH0107298 Part II, M. Best Management Practices Plan

“The permittee shall maintain a best management practices (BMP) plan for the control of toxic pollutants, oils , and other unauthorized pollutants that may be discharged from outfall 3IN000170003 and internal monitoring station 3IN00170602.

...

The BMP plan shall be maintained in accordance with good engineering practices and shall:

...

d) include monitoring of internal wastewater streams and noncontact cooling waters as necessary to isolate sources of toxic and hazardous pollutants.”

The BMP Plan is separate and distinct from the SWPPP. A review of the three most recent semi-annual monitoring periods in June 2024, and December and June 2023 showed detectable concentrations of organic chemicals, pesticides and metals in both Outfall 003 and 604 discharges.

Date		6/12/24	6/12/24	12/14/23	12/14/23	6/13/23	6/13/23
Lab ID		180-175426-1	180-175426-2	180-166944-1	180-166944-2	180-157887-1	180-157887-2
Location		Outfall 003	IMS-602	Outfall 003	IMS-602	Outfall 003	IMS-602
Parameter ug/L unless noted otherwise	Bromodichloromethane	3.8	3.3	6.9	9.1	7.3	7.9
	Bromoform	ND	ND	2.6	2.5	3.6	1.6
	Chloroform	6.5	7.0	9.4	13	8.8	9.7
	Dibromochloromethane	2.1	2.1	4.8	5.7	13	6.6
	Alpha-BHC	ND	ND	0.0025	0.0051	ND	ND
	4-4'-DDT	ND	ND	0.0010	ND	ND	ND
	Endosulfan I	0.0027	0.013	ND	ND	ND	ND
	Endosulfan Sulfate	ND	ND	0.0021	ND	ND	ND
	Endrin aldehyde	ND	ND	ND	ND	ND	0.0035
	Mercury	7.4 ng/L	4.4 ng/L	18 ng/L	18 ng/L	6.8 ng/L	6.4 ng/L
	Antimony	1.1 J	0.99 J	1.1	1.1	1.9	1.6
	Arsenic	1.4 J	1.4 J	1.3	0.99	2.0	1.4
	Chromium	2.3 J	ND	3.1	2.3	1.8	1.5
	Copper	4.6	2.9	9.2	9.2	5.9	5.4
	Lead	2.8	1.6	5.0	4.8	3.0	2.7
	Nickel	3.5	1.6 J	2.6	2.7	ND	ND
	Zinc	36	30	52	52	41	35
	Ammonia	0.16	Not Tested	ND	Not Tested	ND	Not Tested

EPA asked to review a current copy of the BMP plan during the inspection and was given a copy of a plan which contained only the RCRA Contingency Plan as the BMP Plan. That document did not appear to contain all requirements of the BMP Plan, contained in Part II, paragraph M, of the NPDES permit. Specifically, the plan did not include monitoring for internal wastewater streams and noncontact cooling waters to isolate sources of toxic and hazardous pollutants observed during the semi-annual priority pollutant monitoring. Jonathan Moody asked about the organic chemicals and pesticides which were observed during the semiannual monitoring, and if there was additional sampling of wastewater streams and/or additional investigations to determine the source of that contamination. HTS representatives were not able to provide records of additional monitoring nor investigations.

11. HTS is incorrectly applying the eDMR substitution code for below detectable limit for some required monitoring parameters. The facility uses a contract laboratory, Eurofins, to conduct some laboratory analysis services, and Eurofins reports both a Method Detection Limit (MDL) and a Reporting Limit (RL). When laboratory results are greater than the MDL, but less than the RL, HTS personnel will report “below detectable limit”, using the ‘AA code’ on the DMR. The chart below summarizes two recent monitoring periods:

	Outfall	Parameter	eDMR	Laboratory Report Job Number 180- 157887-1*
<i>June 12, 2024</i>	003	<i>Arsenic</i>	AA 0.75	2.0 J
	003	<i>Selenium</i>	AA 0.89	0.89 J
	003	<i>Silver</i>	AA 0.053	0.079 J
	003	<i>Cadmium</i>	AA 0.20	0.32 J
	003	<i>Chromium</i>	AA 1.2	1.8 J
	003	<i>Cyanide</i>	AA 0.79	1.1 J
	602	<i>Arsenic</i>	AA 0.75	1.4 J
	602	<i>Chromium</i>	AA 1.2	1.5 J
<i>December 14, 2023</i>	003	<i>Arsenic</i>	AA 0.75	1.3 J
	003	<i>Cadmium</i>	AA 0.20	0.26 J
	003	<i>Chromium</i>	AA 1.2	3.1 J
	602	<i>Arsenic</i>	AA 0.75	0.99 J
	602	<i>Chromium</i>	AA 1.2	2.3 J

**The Laboratory Report from Eurofins states the samples were collected on June 13, 2024. The eDMR reports the samples on June 12, 2024.*

Per the “Ohio EPA e-DMR Data Substitution Codes (A Codes)” factsheet. The AA code is for Below Detectable Limit. The factsheet states: “Use this code when the quantitative analysis for a substance is done according to an approved analytical method and either does not detect the substance or detects it at a level below the Method Detection Limit

(MDL). Enter the MDL value after the AA code separated by a single space (ex. AA 5.0). No comment is required."

The Eurofins Definitions/Glossary under the Qualifier Description for the 'J' qualifier states: *"Result is less than the RL [Reporting Limit] but greater than or equal to the MDL [Method Detection Limit] and the concentration is an approximate value."*

EPA asked if HTS had been directed by Ohio EPA to use the 'AA Code' when results were above the MDL but below the RL. HTS staff said they were not aware of communication with Ohio EPA on the use of the 'AA Code'.

Appendices and Attachments

- A. Aerial Image
- B. Digital Image Log
- C. Received Documents

DIGITAL SIGNATURES

Report Author Name and Title

JONATHAN

Report Author Signature: MOODY

Digitally signed by JONATHAN
MOODY
Date: 2024.11.06 10:25:07 -05'00'

Section Supervisor Name and Title

BROOKE FURIO

Section Supervisor Signature: _____

Digitally signed by BROOKE
FURIO
Date: 2024.11.06 11:02:15 -05'00'

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024

APPENDIX A: AERIAL IMAGE

AERIAL FROM GOOGLE ON 10/8/2024

APPROXIMATE AREA OF DISTURBANCE OBSERVED DURING THE INSPECTION: 68,971 SQFT OR 1.58 ACRES



Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024

APPENDIX B: DIGITAL IMAGE LOG

Photographer Name: Jonathan Moody

Camera Model, S/N: Nikon CoolPixW300, 31034420

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



1: DSCN2198.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/30/2024 11:54 AM

Camera Direction: Southwest

Description: Located south of the incinerator building. At the time of the inspection a condensate drip from an air conditioning unit was flowing across the pavement, from north to south, towards the Ohio River. The map in the NPDES permit application indicates there is a berm present at this location. No berm was visible at the time of the inspection.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



2: DSCN2199.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 11:18 AM

Camera Direction: Southeast

Description: At the truck holding/tanker unloading area immediately south of the Administration Building. Two downspouts are visible in this area, and are marked with red arrows. The front downspout is connected to an underground sewer, and per the map included with the NPDES permit application, this downspout is connected to an Area 'A' sewer. The back downspout outlets to the pavement and is tributary to the Area 'B' sewers.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



3: DSCN2200.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 11:24 AM

Camera Direction: Southwest

Description: Pavement south of the incinerator building. At the time of the inspection, forklifts with containers were operating on this roadway which runs along the south side of the incinerator building.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



4: DSCN2201.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 11:29 AM

Camera Direction: South east

Description: Southwestern corner of the new shredder building construction site. Camera is looking toward the Ohio River, at the time of this photo, there was no silt fence visible. Some silt fence was located at a low spot near the southwest corner of the new building.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



5: DSCN2202.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 11:34 AM

Camera Direction: Inside, Down

Description: Erosion and Sediment Control Plan onsite at the time of the inspection.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



6: DSCN2203.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 11:40 AM

Camera Direction: South

Description: At the time of the inspection there were four, open-sided storage structures located south of the Organic Waste Tank Farm building. These storage structures are adjacent to the slope to the Ohio River and were used to store kiln materials and unused processing equipment. This photo shows the western most storage structure. This storage structure and the vehicle access to the storage structures were not shown on the map included in the attachment to the NPDES permit, nor in the SWPPP.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



7: DSCN2204.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 11:41 AM

Camera Direction: Northeast

Description: Looking through the construction site for the new shredder building and at the open faces of the storage structures located adjacent the Ohio River. At the time of the inspection, some materials and equipment were not covered by the roofs on the open-sided storage structures.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



8: DSCN2205.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 11:42 AM

Camera Direction: South

Description: At the time of the inspection there were four, open-sided storage structures located south of the Organic Waste Tank Farm building. These storage structures are adjacent to the slope to the Ohio River and were used to store kiln materials and unused processing equipment. This photo shows the second from the west storage structure. This storage structure and the vehicle access to the storage structures were not shown on the map included in the attachment to the NPDES permit, nor in the SWPPP.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



9: DSCN2206.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 11:44 AM

Camera Direction: South

Description: At the time of the inspection there were four, open-sided storage structures located south of the Organic Waste Tank Farm building. These storage structures are adjacent to the slope to the Ohio River, and were used to store kiln materials, and unused processing equipment. This photo shows the second from the west storage structure. This storage structure and the vehicle access to the storage structures were not shown on the map included in the attachment to the NPDES permit, nor in the SWPPP.

The bricks shown in this area had a black material stuck to them.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



10: DSCN2207.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 11:45 AM

Camera Direction: South

Description: At the time of the inspection there were four, open-sided storage structures located south of the Organic Waste Tank Farm building. These storage structures are adjacent to the slope to the Ohio River, and were used to store kiln materials and unused processing equipment. This photo shows the third from the west storage structure. This

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024

storage structure and the vehicle access to the storage structures were not shown on the map included in the attachment to the NPDES permit, nor in the SWPPP.



11: DSCN2208.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 11:47 AM

Camera Direction: Southeast

Description: Dumpsters located adjacent and to the east of the open-sided storage structures, and adjacent to the Ohio River. At the time of the inspection, Jon Zoppelt said that these dumpsters were being used for both facility operations and construction activities, but no hazardous materials were placed in these dumpsters.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



12: DSCN2209.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 11:47 AM

Camera Direction: Down

Description: Dumpsters located adjacent and to the east of the open-sided storage structures, and adjacent to the Ohio River. At the time of the inspection, Jon Zoppelt said that these dumpsters were being used for both facility operations and construction activities, but no hazardous materials were placed in these dumpsters.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



13: DSCN2210.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 11:48 AM

Camera Direction: Southeast

Description: Dumpsters located adjacent and to the east of the open-sided storage structures, and adjacent to the Ohio River. At the time of the inspection, Jon Zoppelt said that these dumpsters were being used for both facility operations and construction activities, but no hazardous materials were placed in these dumpsters.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



14: DSCN2211.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 11:49 AM

Camera Direction: Northwest

Description: Standing next to the open-sided storage structures and looking north through the construction site for the new shredder building. No silt fence nor erosion control measures are visible in this photo.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



15: DSCN2212.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 11:49 AM

Camera Direction: North

Description: Standing next to the open-sided storage structures and looking north through the construction site for the new shredder building. No erosion control measures, including silt fence, are visible in this photo.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



16: DSCN2213.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 11:52 AM

Camera Direction:

Description: At the eastern edge of the construction site for the new shredder building. Looking toward the gate that leads to the Ohio River. A section of silt fence was present in this low spot.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



17: DSCN2214.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 11:53 AM

Camera Direction: North

Description: At the northeast corner of the construction site for the shredder building. This gate was used for construction traffic, and the concrete washout was constructed here. Neither the vehicle access, nor concrete washout were shown on the Soil Erosion and Sedimentation Control plan available onsite (Photo 5). This area of disturbance was not included in the limit of disturbance boundary on the Soil Erosion and Sedimentation Control Plan.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



18: DSCN2215.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 11:53 AM

Camera Direction: Northeast

Description: At the northeast corner of the construction site for the shredder building. This gate was used for construction traffic, and the concrete washout was constructed here. Neither the vehicle access, nor concrete washout were shown on the Soil Erosion and Sedimentation Control plan available onsite (Photo 5). This area of disturbance was not included in the limit of disturbance boundary on the Soil Erosion and Sedimentation Control Plan.

Facility Name: Heritage Thermal Services, Inc.

Facility Location: 1250 St. George Street, East Liverpool, Ohio

Date of Inspection: August 27, 2024



19: DSCN2216.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 12:02 PM

Camera Direction: Down

Description: Cover page for the construction plan set. This was a the set that contained the Soil Erosion and Sedimentation Control Plan (Photo 5).

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



20: DSCN2217.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 12:08 PM

Camera Direction: Southwest

Description: Carbon bed absorption system, runoff from this area is tributary to an Area 'B' sewer.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



21: DSCN2218.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 12:22 PM

Camera Direction: West

Description: Empty totes stored in the area adjacent to the carbon bed absorption system.

Per Carrie Beringer these totes are RCRA empty and have not been washed.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



22: DSCN2219.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 12:26 PM

Camera Direction: Inside

Description: Looking inside the room with the water softener system. At the time of the inspection there was an ongoing maintenance activity in this room and EPA inspectors could not enter the space.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



23: DSCN2220.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 12:30 PM

Camera Direction: North

Description: South of the Truck Holding and Sampling Area. The contents and purpose of the overturned bucket could not be determined at the time of the inspection. This concrete pad is used to store salt and water softening materials. Per the drawing attached to the NPDES

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024

permit application, this area is an Area 'B' drainage, however the VonRoll drawing, and the Area 'B' sewer map show the drainage in this area is tributary to Area 'A'.



24: DSCN2221.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 1:03 PM

Camera Direction: Southeast

Description: Near the southwest corner of the facility, in an area adjacent to and tributary to the Ohio River. This area is known as 'Brass Alley'. There was a dumpster here. This activity/area was not included in the NPDES permit application, nor the SWPPP.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



25: DSCN2222.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 1:03 PM

Camera Direction: Southeast

Description: Near the southwest corner of the facility, in an area adjacent to and tributary to the Ohio River. This area is known as 'Brass Alley'. There was a dumpster here. This activity/area was not included in the NPDES permit application, nor the SWPPP.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



26: DSCN2223.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 1:03 PM

Camera Direction: West

Description: Near the southwest corner of the facility, in an area adjacent to and tributary to the Ohio River. This area is known as 'Brass Alley'. There was a dumpster here. This activity/area was not included in the NPDES permit application, nor the SWPPP.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



27: DSCN2224.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 1:04 PM

Camera Direction: South

Description: Near the southwest corner of the facility, in an area adjacent to and tributary to the Ohio River. This area is known as 'Brass Alley'. There was a dumpster here, the pavement around the dumpster was stained and discolored, and there was standing water near the dumpster.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024

There was a dumpster here. This activity/area was not included in the NPDES permit application, nor the SWPPP.



28: [DSCN2225.JPG](#)

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 1:05 PM

Camera Direction: West

Description: Near the southwest corner of the facility, in an area adjacent to and tributary to the Ohio River. This area is known as 'Brass Alley'. Metal fabrication activities occur in this area. The pavement in this area was discolored and stained. This activity/area was not included in the NPDES permit application, nor in the SWPPP.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



29: DSCN2226.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 1:11 PM

Camera Direction: South

Description: Near the southwest corner of the facility, in an area adjacent to and tributary to the Ohio River. This area is known as 'Brass Alley'. Metal fabrication activities occur in this area. The pavement in this area was discolored and stained. This activity/area was not included in the NPDES permit application, nor in the SWPPP.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



30: DSCN2227.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 1:12 PM

Camera Direction:

Description: Near the southwest corner of the facility, in an area adjacent to and tributary to the Ohio River. This area is known as 'Brass Alley'. Looking behind the dumpster shown in Photos 24, 25 and 27. The Ohio River is the left of the camera. The gravel off the edge of the pavement was discolored and stained.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



31: DSCN2228.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 1:25 PM

Camera Direction: Down

Description: Looking into the manhole with the flume for monitoring flow at Outfall 003. The direction of flow is up.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



32: DSCN2229.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 1:29 PM

Camera Direction: South

Description: pH probe readout at the location of the shutoff of flow at the flume at Outfall 003.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



33: DSCN2230.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 1:34 PM

Camera Direction: South

Description: Tank level readout at the Area 'B' water storage tanks. At the time of the inspection, The eastern tank was approximately 85%, the middle tank was approximately 65 % and the western tank was empty.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



34: DSCN2231.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 1:37 PM

Camera Direction: Southwest

Description: The west Area 'B' water tank outlet. This is the location where samples are

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024

collected prior to discharge.



35: DSCN2232.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 1:44 PM

Camera Direction: East

Description: The east Area 'B' water tank outlet. This is the location where samples are collected prior to discharge.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



36: DSCN2233.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 1:45 PM

Camera Direction: Southwest

Description: The middle Area 'B' water tank outlet.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



37: DSCN2234.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 1:49 PM

Camera Direction: South

Description: At the middle Area 'B' water tank outlet. This positioner shows the position of the pneumatically controlled valves.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



38: DSCN2235.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 1:51 PM

Camera Direction: Up

Description: Flow meter on the combined header from the Area B water tanks. The red light indicates a fault. This flow meter sends data to the SCADA system, but is not used for NPDES compliance purposes.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



39: DSCN2236.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 1:51 PM

Camera Direction:

Description: Flow meter on the combined header from the Area B water tanks. This flow meter sends data to the SCADA system, but is not used for NPDES compliance purposes.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



40: DSCN2237.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 7/31/2024 1:57 PM

Camera Direction: Northwest

Description: Empty containers stored in an area south of the North Storage Area. Runoff from the area shown in this photo is tributary to an Area 'B' sewer. Per Carrie Beringer, these containers had held sacks filled with material which was disposed of and the containers are now empty. The DOT placards are for a flammable solids material.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



41: DSCN2238.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 8/1/2024 10:43 AM

Camera Direction: Down

Description: Sewer structure north of the unused water treatment building. At the time of the inspection there was a small diameter pipe with flowing water inside this structure. The water was from a compressor system located inside the water treatment building and was Area 'A' water tributary to Outfall 003.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



42: DSCN2239.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 8/1/2024 10:44 AM

Camera Direction: South

Description: Sewer structure north of the unused water treatment building. At the time of the inspection there was a small diameter pipe with flowing water inside this structure. The water was from a compressor system located inside the water treatment building and was Area 'A' water tributary to Outfall 003.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



43: DSCN2240.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 8/1/2024 10:48 AM

Camera Direction: Closeup

Description: Flow meter at the Area 'B' water combined outlet header.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



[44: DSCN2241.JPG](#)

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 8/1/2024 10:48 AM

Camera Direction: Closeup

Description: Flow meter at the Area 'B' water combined outlet header.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



45: DSCN2242.JPG

Location: Heritage Thermal Services, Inc.

Photographer: Jonathan Moody

Date/Time: 8/1/2024 10:48 AM

Camera Direction: Closeup

Description: Flow meter at the Area 'B' water combined outlet header.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: *August 27, 2024*

Heritage Thermal Services
WF-200 FORM 1
Revision 5

B WATER TANK DISCHARGE RECORD

Storm Water Storage Tank Number to Discharge 1 2 3	Discharge Number (EHS Dept)	Tank Labelled (Operator Initials)	Date of Sample 7-25-24
Tank Local Level Indication Start (Percent and Feet)* 91% 21.2 ft		Tank Local Level Indication Stop (Percent and Feet)*	

Lab Sample Analyses Results

Sample Number *W5A1008*

pH *7.3* (must be between 6.5 and 9.0 before release) TOC *3.1* (must be less than 59 ppm prior to release)

COD *39*

Turbidity (seventy description, 0 to 4) *0*

Odor (seventy description, 0 to 4) *0*

Color (seventy description, 0 to 4) *0* (if 2 or greater, then notify the EHS Department)

Lab Results By: (Print Name) *Jonathan Parry* (Signature) *[Signature]* Date *7/24/24* Time *2:32.8*

Approval Signatures for Release

Group Manager By: (Print Name) *Bryan Blythe* (Signature) *[Signature]* Date *7-25-24* Time *8:57.49*

Environmental By: (Print Name) *Carris Brown* (Signature) *[Signature]* Date *7/25/24* Time *8:53 AM*

REMEMBER TO TAKE A SAMPLE AT THE PARSHALL FLUME DURING TANK DISCHARGE

Control Room Release Data			
Release	Date	Time	Tank Level, Feet
Start	<i>7-25-24</i>	<i>0904</i>	<i>29.3</i>
Stop	<i>7-26-24</i>	<i>0322</i>	<i>1.2</i>
			Volume Gallons** <i>183,125</i>
			Volume Released*** <i>175,625</i>

* Local Feet = Local Percent * 0.31 (feet per %)
** Volume Gallons = Tank Level, Feet * 6.250 (Gallons/Feet)
*** Volume Released = Start Volume - Stop Volume

Remarks *Lost Flow discharge complete*

Control Room By: (Print Name) *Jimmy Lisk* (Signature) *[Signature]* Date *7-26-24* Time *3:25.44*

Uncontrolled copy when printed

46: DSCN2243.JPG

Location: *Heritage Thermal Services, Inc.*

Photographer: *Jonathan Moody*

Date/Time: *8/1/2024 11:35 AM*

Camera Direction: *Down*

Description: *Example of the Area 'B' water tank discharge records.*

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



47: DSCN4215.JPG

Location: Heritage Thermal Services

Photographer: Jonathan Moody

Date/Time: 8/27/2024 11:58 AM

Camera Direction: Down

Description: Flume, photo is zoomed, direction of flow is top of photo to bottom. Per Craig Talbot, the depth sensor is the device at the location indicated by the arrow. The transducer was free hanging from the cable.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



48: DSCN4216.JPG

Location: Heritage Thermal Services

Photographer: Jonathan Moody

Date/Time: 8/27/2024 11:58 AM

Camera Direction:

Description: Zoom photo into the flume manhole.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



49: DSCN4217.JPG

Location: Heritage Thermal Services

Photographer: Jonathan Moody

Date/Time: 8/27/2024 11:59 AM

Camera Direction: Down

Description: Flume, photo is zoomed, direction of flow is top of photo to bottom. Per Craig Talbot, the depth sensor is the device at the location indicated by the arrow. The transducer was free hanging from the cable.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



50: DSCN4219.JPG

Location: Heritage Thermal Services

Photographer: Jonathan Moody

Date/Time: 8/27/2024 12:02 PM

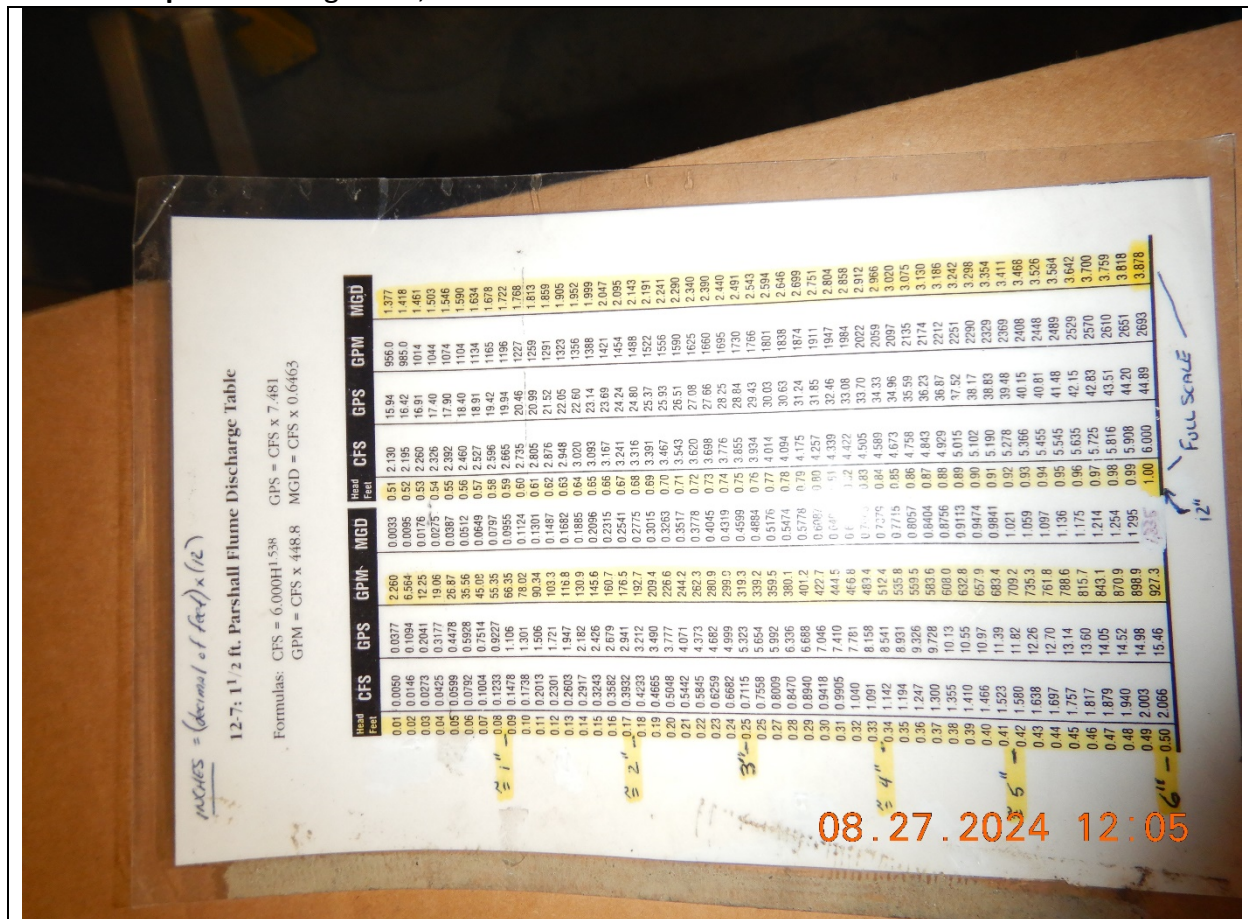
Camera Direction: Southeast

Description: Flume manhole and containers inside the Bulk Solids Storage Area south of the B water tanks.

Facility Name: Heritage Thermal Services, Inc.

Facility Location: 1250 St. George Street, East Liverpool, Ohio

Date of Inspection: August 27, 2024



51: DSCN4220.JPG

Location: Heritage Thermal Services

Photographer: Jonathan Moody

Date/Time: 8/27/2024 12:05 PM

Camera Direction: Down

Description: Depth/flow relationship table for the 18" parshall flume.

Facility Name: Heritage Thermal Services, Inc.

Facility Location: 1250 St. George Street, East Liverpool, Ohio

Date of Inspection: August 27, 2024



52: DSCN4221.JPG

Location: Heritage Thermal Services

Photographer: Jonathan Moody

Date/Time: 8/27/2024 12:05 PM

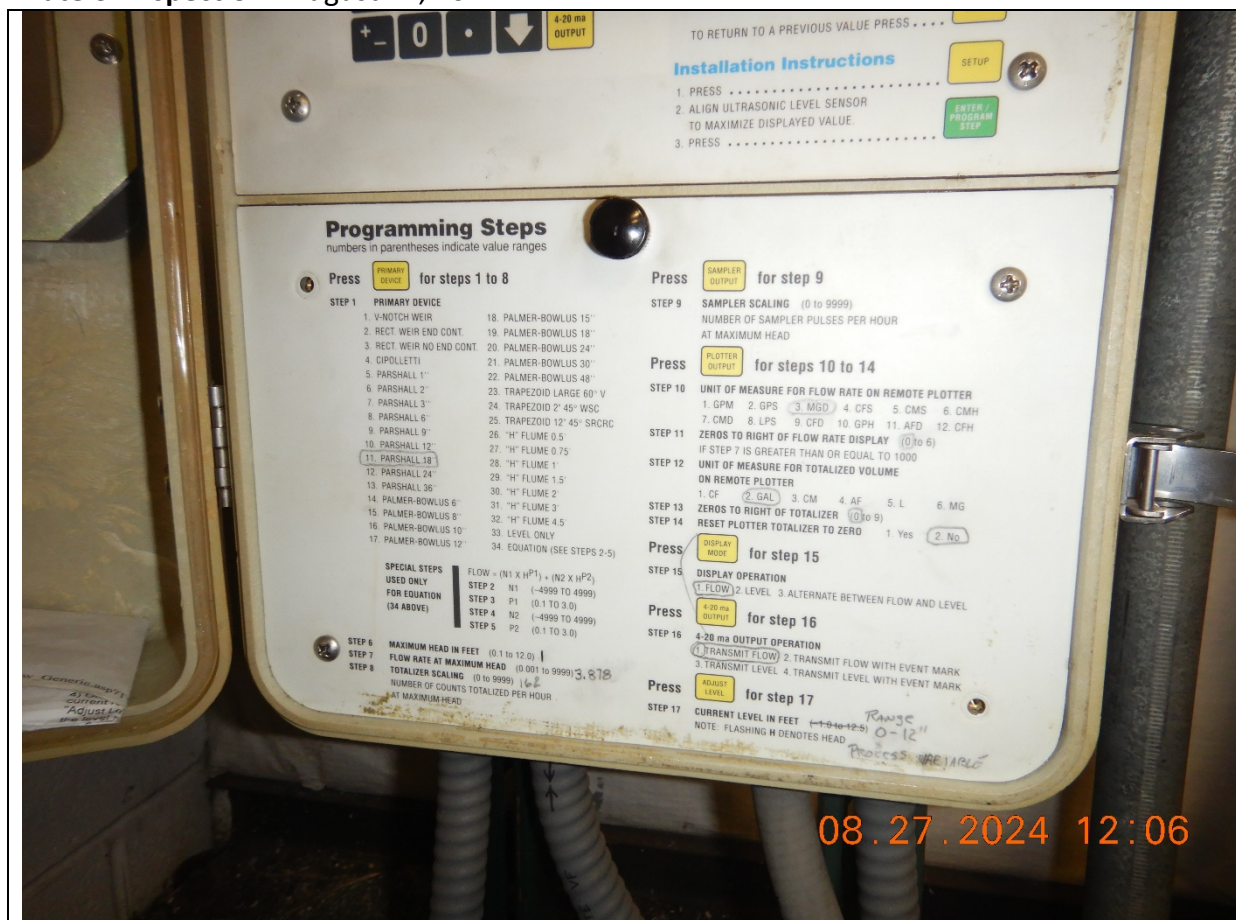
Camera Direction: Inside

Description: ISCO 3010 flow meter transmitter for the outfall 003 flow monitoring. The H on the left hand side of the display indicates depth or head. At the time of the photograph, the meter was showing 0.13 feet of water.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: *August 27, 2024*



53: DSCN4222.JPG

Location: *Heritage Thermal Services*

Photographer: *Jonathan Moody*

Date/Time: *8/27/2024 12:06 PM*

Camera Direction: *Inside*

Description: *Programming steps printed on the ISCO 3010.*

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



54: DSCN4223.JPG

Location: Heritage Thermal Services

Photographer: Jonathan Moody

Date/Time: 8/27/2024 12:10 PM

Camera Direction: Closeup

Description: Flow meter on the discharge from the Area 'B' water tanks. Not used for NPDES compliance purposes.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



55: [DSCN4224.JPG](#)

Location: Heritage Thermal Services

Photographer: Jonathan Moody

Date/Time: 8/27/2024 12:12 PM

Camera Direction: Down

Description: Flow meter on the discharge from the Area 'B' water tanks. Not used for NPDES compliance purposes.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



56: [DSCN4225.JPG](#)

Location: Heritage Thermal Services

Photographer: Jonathan Moody

Date/Time: 8/27/2024 12:17 PM

Camera Direction: Down

Description: Outlet of the storm sewer conveying Outfall 003 to the Ohio River.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



57: DSCN4226.JPG

Location: Heritage Thermal Services

Photographer: Jonathan Moody

Date/Time: 8/27/2024 12:17 PM

Camera Direction: Down

Description: Outlet of the storm sewer conveying Outfall 003 to the Ohio River.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



58: DSCN4227.JPG

Location: Heritage Thermal Services

Photographer: Jonathan Moody

Date/Time: 8/27/2024 12:18 PM

Camera Direction: Down, Southeast

Description: Outlet of the storm sewer conveying Outfall 003 to the Ohio River.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024



59: DSCN4228.JPG

Location: Heritage Thermal Services

Photographer: Jonathan Moody

Date/Time: 8/27/2024 12:20 PM

Camera Direction:

Description: Material staging area for the construction of the new shredder building.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024

APPENDIX C: RECEIVED DOCUMENTS

File Name	Received	Notes
003_CODColorOdorpHTOCTurbidity_2021toInsp.pdf	Received During Inspection	Table with the daily COD, Color, Odor, pH, TOC and Turbidity measurements taken at the Parshall Flume, Outfall 003. For 2021
DailyFlumeFlowTempmeasurements_2021toInsp.pdf	Received During Inspection	Table with the daily maximum temperature and total flow (MGal) at Outfall 003 (Flume) and Daily total flow from B-Water.
Erosion and Sediment Control Plan for Shredder Building_20240116.pdf	Received During Inspection	Drawing LD-3 from the new shredder building design set. This is the Erosion and Sediment Control Plan, plan date 1.16.2024
HeritageSWPPP Site Map.pdf	Received During Inspection	Excerpt (figure 3 only) from the SWPPP, dated July 24, 2024.
NPDES Permit OneLine Diagram Rev 1_ 20210115.pdf	Received During Inspection	Provided by HTS, during the inspection. Per the facility representatives, this diagram was included with the version of the NPDES permit application signed by Christopher Pherson, dated 1/19/2021. This version of the diagram differs from the version Ohio EPA provided prior to the inspection. This version has average flows, and shows the average flow from the 'B' Water is 0.035 MGD and the average flow at Outfall 003 is 0.049.
StormsewerLayoutSystemB.pdf	Received During Inspection	VonRoll drawings C-03-1-0002 Rev 3 and C-03-1-0003, Rev 4 showing the locations of the Area 'B' sewers. Noted that this version does not show the extents of the current facility, which includes the pad used for the Bulk Solids Holding area south of the Area 'B' water storage tanks.
StormWaterPollutionPrevPlan_.pdf	Received During Inspection	The SWPPP provided by the facility during the inspection. Dated July 24, 2024.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024

	Email 8/9/2024	
heritagewti-K7dk-application-241027846.pdf"	Email 8/9/2024	Version of the NPDES application provided by HTS during the inspection. This version was signed by Vince Waggle on July 29, 2020, does not include any sampling data, nor the Line Drawing, and does not include Outfall 003 in Section II. The application lists Outfall 602 as having an average flow of 0.035 MGD.
HTS Quarterly POTW 10-23.pdf"	Email 8/9/2024	October 2023 pretreatment monitoring report submitted to the City of East Liverpool
HTS Survey Report 2019.pdf"	Email 8/9/2024	Copy of a periodic survey conducted to determine changes in elevation throughout the facility. This report was from December 2019, and was provided to show information regarding the access road pitch toward the Ohio River observed along the southern edge of the facility. The relevant monitoring locations, Mon-10 through Mon-14 have been obliterated and are no longer useful for determining elevation changes on the access road located along the bank of the Ohio River.
Land Development Plan Set - Heritage Thermal (2.28.2024).pdf"	Email 8/9/2024	Design drawings for the access road and construction of the new Shredder Building. The site includes the Erosion and Sedimentation Control plan and the proposed storm sewer. The new sewer, including all runoff from the new access roadway and building structure will connect with an existing Area 'A' sewer.
NPDES Sampling-Lab SOPs.pdf"	Email 8/9/2024	Laboratory SOPs for the onsite laboratory analysis for Physical State, pH, TOC, COD, and Total Dissolved Solids. Dated 12/12/2023.
Shredder Building - Heritage Thermal Services - East Liverpool, OH (02.23.24)A&F.pdf"	Email 8/9/2024	Architectural series for the new Shredder Building
Shredder Building - Heritage Thermal Services - East Liverpool, OH (02.23.24)MEP.pdf"	Email 8/9/2024	Mechanical and Plumbing drawings for the new Shredder Building. Drawings show that the interior

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024

		drains for the Shredder Building will terminate at a sump on the north wall of the structure, and that the HTS will provide the connection to the 'C' water system.
Weekly pH Calibrations.PDF"	Email 8/9/2024	Preventative Maintenance record for the pH meters in August 2024.
Weekly Sanitary Discharge Meter Reading.PDF"	Email 8/9/2024	Preventative Maintenance record for the pretreatment discharge flow meter
Weekly Sanitary Discharge pH Calibration.PDF"	Email 8/9/2024	Preventative Maintenance record for the pH meter at the steam plant with the pretreatment discharge
003 Parshall Flume.PDF"	Email 8/9/2024	Preventative Maintenance record for the flume at Outfall 003. The PM details a flow verification procedure using a no flow condition.
2021 B-Discharge.pdf"	Email 8/9/2024	B Water Tank Discharge Record with the pH, TOC, COD, TDS, Turbidity, Odor and Color results and volume discharged for each discharge event in 2021.
2021 eDMR.pdf"	Email 8/9/2024	2021 DMRs
2022 B-Discharges.pdf"	Email 8/9/2024	B Water Tank Discharge Record with the pH, TOC, COD, TDS, Turbidity, Odor and Color results and volume discharged for each discharge event in 2022.
2022 eDMRs.pdf"	Email 8/9/2024	2022 DMRs
2023 B-Discharge.pdf"	Email 8/9/2024	B Water Tank Discharge Record with the pH, TOC, COD, TDS, Turbidity, Odor and Color results and volume discharged for each discharge event in 2023.
2023 eDMRs.pdf"	Email 8/9/2024	2023 DMRs
2024 B-Discharge.pdf"	Email 8/9/2024	B Water Tank Discharge Record with the pH, TOC, COD, TDS, Turbidity, Odor and Color results and volume discharged for each discharge event in 2024.
2024 eDMRs.pdf"	Email 8/9/2024	2024 DMRs
All Water Line Drawing Rev 1.pdf"	Email 8/9/2024	Provided by HTS, during the inspection. Per the facility representatives, this diagram was included with the version of the NPDES permit application signed by

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024

		Christopher Pherson, dated 1/19/2021. This version of the diagram differs from the version Ohio EPA provided prior to the inspection. This version has average flows, and shows the average flow from the 'B' Water is 0.035 MGD and the average flow at Outfall 003 is 0.049. This appears to be the same document as the hard copy "NPDES Permit OneLine Diagram Rev 1_ 20210115.pdf"
Annual FT8831 Calibration for 602.PDF"	Email 8/9/2024	Preventative Maintenance record for a Rosemount pressure differential meter for Outfall 602. This meter is not used for compliance purposes.
B Water Tank Levels 2021.xlsx"	Email 8/9/2024	Excel document of the B Water Tank levels for 2021
B Water Tank Levels 2022.xlsx"	Email 8/9/2024	Excel document of the B Water Tank levels for 2022
B Water Tank Levels 2023.xlsx"	Email 8/9/2024	Excel document of the B Water Tank levels for 2023
B Water Tank Levels 2024.xlsx"	Email 8/9/2024	Excel document of the B Water Tank levels for 2024 to the date of the inspection
c0100001rev23.pdf"	Email 8/9/2024	VonRoll drawing
c0100002 Model (1).pdf"	Email 8/9/2024	VonRoll drawing
c0100003 Model (1).pdf"	Email 8/9/2024	VonRoll drawing
c0100004 Model (1).pdf"	Email 8/9/2024	VonRoll drawing
c0100005 Model (1).pdf"	Email 8/9/2024	VonRoll drawing
c0100006 Model (1).pdf"	Email 8/9/2024	VonRoll drawing
c0100007 Model (1).pdf"	Email 8/9/2024	VonRoll drawing
c0100008 Model (1).pdf"	Email 8/9/2024	VonRoll drawing
c0100009 Model (1).pdf"	Email 8/9/2024	VonRoll drawing
c0100010 Model (1).pdf"	Email 8/9/2024	VonRoll drawing
c0100011 Model (1).pdf"	Email 8/9/2024	VonRoll drawing
c0100012 Model (1).pdf"	Email 8/9/2024	VonRoll drawing
c0100013 Model (1).pdf"	Email 8/9/2024	VonRoll drawing
c0100014 Model (1).pdf"	Email 8/9/2024	VonRoll drawing
c0100015 Model (1).pdf"	Email 8/9/2024	VonRoll drawing
c0100016 Model (1).pdf"	Email 8/9/2024	VonRoll drawing

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024

c0100017 Model (1).pdf"	Email 8/9/2024	VonRoll drawing
c0100018 Model (1).pdf"	Email 8/9/2024	VonRoll drawing
c0100019 Model (1).pdf"	Email 8/9/2024	VonRoll drawing
c0100020 Model (1).pdf"	Email 8/9/2024	VonRoll drawing
c0100021 Model (1).pdf"	Email 8/9/2024	VonRoll drawing
c0100022 Model (1).pdf"	Email 8/9/2024	VonRoll drawing
c0300001rev15.pdf"	Email 8/9/2024	VonRoll drawing
c0300002 Model (1).pdf"	Email 8/9/2024	VonRoll drawing
c0300003 Model (1).pdf"	Email 8/9/2024	VonRoll drawing
c0300004 Model (1).pdf"	Email 8/9/2024	VonRoll drawing
c0300005 Model (1).pdf"	Email 8/9/2024	VonRoll drawing
ComTech SDS BLR-430D.pdf"	Email 8/9/2024	Per Johnson Louigene this is a softener chemical for the steam plant
Comtech SDS_BLR-330A.pdf"	Email 8/9/2024	Per Johnson Louigene this is a softener chemical for the steam plant
Comtech SDS_BLR-400.pdf"	Email 8/9/2024	Per Johnson Louigene this is a softener chemical for the steam plant
Comtech SDS_BLR-578.pdf	Email 8/9/2024	Per Johnson Louigene this is a softener chemical for the steam plant
Comtech SDS_BLR-620.pdf	Email 8/9/2024	Per Johnson Louigene this is a softener chemical for the steam plant, Caustic Soda Solution
Calibration-PM -003.pdf"	Email 9/17/2024	Description of a flow measurement verification procedure. This does not appear to be a calibration procedure for secondary measurement device at the flume/Outfall 003.
Ultra sonic sensor-003.jpg"	Email 9/17/2024	Photo of the label on a spare level sensor used in the flume at Outfall 003.
3010 ultrasonic flow meter-003.jpg"	Email 9/17/2024	Photograph of the ISCO 3010 integrator used for reading and interpreting the level sensor reading for the flume at Outfall 003.
3010 Ultrasonic Flow Transmitter User Manual.pdf"	Email 9/17/2024	3010 Flow Transmitter Installation and Operation Guide.

Facility Name: *Heritage Thermal Services, Inc.*

Facility Location: *1250 St. George Street, East Liverpool, Ohio*

Date of Inspection: August 27, 2024

		This is the device used to read and interpret the signal from the level sensor device in the manhole with the flume at Outfall 003.
11536_C2_0.pdf"	Email 9/17/2024	Drawing from a plan set for the construction of the pad south of the B Water tanks. Shows an existing sewer connection for offsite storm water connecting at a point downstream of the flume at Outfall 003.
3IN00170-2021 App.pdf	From Patricia Vanah, Ohio EPA 7/16/24	Version of the NPDES application provided by Ohio EPA prior to the inspection. This version was signed by Christopher Pherson on January 19, 2021, does not include the Line Drawing, and does not include Outfall 003 in Section II. The application lists Outfall 602 as having an average flow of 0.035 MGD.
20150423_OhioComplianceReport.pdf	Ohio EPA eDocument	Ohio EPA compliance inspection conducted on March 17, 2015.
20210311_OhioComplianceReport.pdf	Ohio EPA eDocument	Ohio EPA compliance inspection conducted on February 23, 2021
PermitAppOnlineSNE_BIZHUBC24072409280.pdf	From Patricia Vanah, Ohio EPA 7/24/24	Version of the Line Drawing provided by Ohio EPA. Per Ohio EPA, this was the version of the line drawing included with the NPDES permit application signed in 2021 by Christopher Pherson. This line drawing is Revision 0, is dated August 27, 2014. The average flow for 602 is 0.015 MGD and the average flow for 0.031 MGD.