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

Report Title:	Clean Water Act Compliance Inspection Report
Inspection Date(s):	09/21/2021 _To_ 09/22/2021
Regulatory Program(s):	National Pollutant Discharge Elimination System (NPDES)
Type of Activity:	Compliance Evaluation Inspection
Site/Facility Name:	U.S. Fish and Wildlife Service (USFWS) National Conservation Training Center
Permittee(s):	USFWS
Site/Facility Operator:	Snyder Environmental Services (SES) and Raven Services
Site/Facility Address:	698 Conservation Way Shepherdstown, WV 25443
Latitude:	39.490698 **Longitude:** -77.810817
County/Parish:	Jefferson County
Permit Number:	WV0105112
NAICS Code:	921190 **SIC:** 9199

Site/Facility Representative(s): **Point of Contact**

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Alan Stupleman – Acting Project Manager, Raven Services

Jeff Pippel – Lead Plant Operator, SES

EPA Contractors:

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Report Preparer Signature/Date	Jake Albright/jake.albright@pgenv.com Preparers' address	10/22/2021 Date
Supervisor Signature/Date	JAMES BENNETT Digitally signed by JAMES BENNETT Date: 2021.10.29 12:16:29 -04'00' James Bennett	Date

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I. Introduction

On September 21—22, 2021, an inspection team composed of U.S. Environmental Protection Agency (EPA) contractors (PG Environmental and ERG, hereafter, "Inspectors") conducted a compliance evaluation inspection (CEI) of the USFWS National Conservation Training Center (hereinafter, "the Facility"). The purpose of the inspection was to observe compliance with the Clean Water Act (CWA) and to verify compliance with the Facility's National Pollutant Discharge Elimination System (NPDES) Permit No. WV0105112 (hereinafter, the "Permit"; included as Appendix A) and applicable State and Federal regulations.

A. Inspection Opening Conference

The Inspectors arrived at the Facility at 10:00 a.m. on September 21, 2021, for the inspection. Inspectors met with the following Facility representatives:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Contractors			
Jake Albright	PG Environmental	(703) 956-1957	Jake.albright@pgenv.com
Kelly Davis	ERG	(703) 633-1646	Kelly.davis@erg.com
Site/Facility Representatives			
Paul Wolford	Manager, Facilities Management Branch	(304) 876-7445	Paul_wolford@fws.gov
Alan Stupleman	Acting Project Manager, Raven Services	--	--
Jeff Pippel	Lead Plant Operator, SES	--	--
State or County Representatives			
Mike Kanehl	WVDEP	(304) 549-1733	Michael.k.kanehl@wv.gov

Mr. Jake Albright with PG Environmental displayed his Clean Water Act inspector credential to Mr. Paul Wolford, the primary Facility representative, at the outset of the inspection and explained the purpose of the inspection was to observe compliance with its Permit. A copy of the Permit is provided in Appendix A. Mr. Albright informed Mr. Wolford that any information that the Facility deemed to be confidential business information (CBI) should be identified during the inspection and it would be handled as CBI according to EPA's CBI procedures.

Photographs were taken during the inspection by Jake Albright and Kelly Davis, and are provided in Appendix B, Photograph Log. Supporting documentation is included in Appendix C, Exhibit Log.

B. Weather and Precipitation Conditions

During the inspection, weather was cloudy and overcast, with periods of moderate precipitation. National Oceanic and Atmospheric Administration National Weather Service precipitation data for the dates of the inspection and 5 days prior are provided in the Table 2 below:

Table 2: Precipitation Data

Station Name	Date	Precipitation Amount (inches)[1]
Auburn 8.3 ENE, WV	9/16/2021	0.11
Auburn 8.3 ENE, WV	9/17/2021	Trace
Auburn 8.3 ENE, WV	9/18/2021	Trace
Auburn 8.3 ENE, WV	9/19/2021	Trace
Auburn 8.3 ENE, WV	9/20/2021	0
Auburn 8.3 ENE, WV	9/21/2021	0
Auburn 8.3 ENE, WV	9/22/2021	0.17

C. Summary of the Site/Facility

The USFWS National Conservation Training Center (NCTC) is federally owned and operated conference center encompassing approximately 540 acres. The Facility is supported by a variety of operations including dorms, food service, classrooms, offices, an auditorium, a day care Facility, and a laboratory. The Facility also has Facility maintenance services, including multiple maintenance yard areas. The inspection focused on wastewater treatment and stormwater management at the Facility, both of which are regulated by the Permit.

Wastewater Collection and Treatment

Wastewater at the Facility originates from a variety of sources related the operations and services provided at the NCTC. There are six main lift stations in the collection system that vary in size and capacity. All wastewater on site is eventually directed to Lift Station No. 3, located approximately ¼ mile from the wastewater treatment plant (WWTP), for final conveyance to the plant.

Under normal circumstances, Facility wastewater is primarily a mix of cooling tower blowdown, cafeteria wastewater, laundry service wastewater, and sanitary sewage. At the time of the inspection, the Facility had not been operational for approximately 18 months due to the COVID-19 pandemic. Wastewater during that time was primarily composed of cooling tower blowdown and wastewater from cleaning operations. According to the Lead Plant Operator, influent flow to the WWTP averages about 30,000 gallons per day (gpd). If both of the oxidation ditches were online, the WWTP could provide a treatment capacity of up to 82,000 gpd.

Influent flow to the WWTP enters the headworks microscreen for preliminary solids removal (refer to Appendix B, Photograph 1). The microscreen was out of service at the time of the inspection. The headworks is also equipped with a microscreen bypass channel with manual bar screen. Flow was observed going through the bar screen at the time of the inspection (refer to Appendix B, Photograph 2).

Flow continues to a distribution box that controls flow to two oxidation ditches (refer to Appendix B, Photographs 3 through 7). Oxidation No. 2 was out of service for repair at the time of the inspection (refer to Appendix B, Photograph 7). The Lead Plant Operator explained that the oxidation ditches should have been alternated every 6 months; however, Oxidation Ditch No.

[1] Source: National Oceanic and Atmospheric Administration National Climatic Data Center (http://www.ncdc.noaa.gov/).

2 had been left to run for 18 months without a maintenance interval, until it failed (see Observation 8).

The oxidation ditches are designed to facilitate nitrogen removal. Aeration is provided by a rotating brush. At the time of the inspection, solids levels and biochemical oxygen demand (BOD) concentration in the influent were low because the majority of the influent was cooling tower blowdown. The Lead Plant Operator explained that this was because there have not been patrons onsite since early 2020 due the COVID-19 pandemic. The low solids and BOD had been causing the plant biology to fail and become less effective. The Lead Plant Operator stated operators started adding a biological supplement to the oxidation ditch in August 2021 and were also costing a carbon source at the time of the inspection, likely MicroC®, to help keep the plant biology working more effectively until the conference center begins normal operations and the plant starts receiving normal flows and loading again.

Each oxidation ditch is equipped with a clarifier in the central portion of the tank. As stated previously, Oxidation Ditch No. 2 (including the clarifier) was out of service at the time of the inspection. Solids that settle out during clarification are collected by sludge return or waste pumps and directed back to the oxidation ditch or to the aerated wasted sludge holding tank (refer to Appendix B, Photograph 8), respectively. The Lead Plant Operator stated that the Facility had not been wasting sludge for the majority of the pandemic due to low solids loading in the influent. All sludge from the clarifier was being returned to Oxidation Ditch No. 1 at the time of the inspection.

Clarified effluent flows over the clarifier weirs and is directed to the chlorine contact chamber (refer to Appendix B, Photograph 9). Sodium hypochlorite is injected into the clarified effluent just prior to entering the chamber. After flowing through the chamber, disinfected effluent is dechlorinated with sodium sulfite solution. At the time of the inspection, the Facility had also installed ultraviolet (UV) lamps in the chlorine contact chamber (refer to Appendix B, Photograph 10). The Lead Plant Operator stated that the UV system was being tested to see if it would be effective, however, he believed the effluent was too cloudy for UV to work correctly.

Effluent flow is measured via ultrasonic transducer and v-notch weir prior to entering the discharge pipeline to Outlet No. 001 and into the Potomac River (refer to Appendix B, Photograph 11 through 15). The effluent flow meter was not working properly at the time of the inspection; therefore, the Lead Plant Operator was using water consumption rates at the Facility to estimate effluent flow (see Observation 6).

Facility representatives stated that Outlet No. 002, which was connected to fish tanks in the Facility's laboratory building, used to discharge directly to the Potomac River. However, the Facility modified the discharge from the fish tanks several years prior to the inspection to discharge to the sanitary sewer when in operation. The Inspectors observed that the tanks were not operating at the time of the inspection (refer to Appendix B, Photograph 16).

Stormwater Management

Stormwater runoff is collected by a network of storm drain inlets located throughout the Facility and is discharged into unnamed tributaries to the Potomac River through five outlets (Outlet Nos. 004 through 008) located at various locations throughout the Facility (refer to Appendix B, Photographs 17 through 25).

Facility representatives explained that the Facility plugged Outlet No. 009 about 10 years prior to the inspection; the outlet was not discharging at the time of the inspection (refer to Appendix B, Photographs 26 and 27).

The Facility has four large stormwater ponds that capture all runoff in the drainage areas for Outlet Nos. 004, 005, 006, and 007 (refer to Appendix B, Photographs 28 through 31). Runoff in the Outlet No. 008 drainage area is directed through an oil/grit separator before discharging (refer to Appendix B, Photographs 32 and 33).

II. Site Activity

During the inspection, the Inspectors observed the WWTP and select parts of the wastewater collection system as well as the Facility's Support Services Building, stormwater best management practices (BMPs), and outlets. Inspection observations were made pursuant to the requirements of the Permit. The observations from the inspection are described in detail in Section III of this report.

Wastewater Treatment

The Inspectors started the inspection by visiting the fish tanks in the Facility's laboratory building. The fish tanks did not appear to be in operation.

The Inspectors then visited Lift Station #1 located near the Commons Building. The station appeared to be in good working order.

The Inspectors then visited the WWTP and walked the treatment train from influent to effluent with the Lead Plant Operator. During the walkthrough, the Lead Plant Operator explained that several of the treatment units and associated equipment were out of service for repair (see Section III of this report for observations).

Additionally, the Lead Plant Operator conducted a sludge judge measurement in Clarifier No. 1 for process control as well as took a chlorine residual sample at the Permit-specified effluent monitoring location during the inspection (refer to Appendix B, Photographs 6 and 34 through 36). The result exceeded the Permit limit (see Section III of this report for observations).

Following the walkthrough of the treatment train, the Inspectors observed the operator's onsite laboratory, which is used for process control monitoring and field analyses (i.e., no benchtop compliance testing). The Inspectors also observed the chemical feed room and the pump and blower room (refer to Appendix B, Photographs 37 through 41).

Upon leaving the WWTP site, the Inspectors drove to Outlet No. 001, located approximately 650-700 feet north of the WWTP fence line, and observed the WWTP discharge into the Potomac River. Foam was observed at the outlet (see Section III of this report for observations).

Stormwater Management

During the stormwater management portion of the inspection, the Inspectors observed the Facility's Support Service Building, Wage-Grade Building, stormwater basins, and Outlet Nos. 004 through 009. The Facility performs vehicle maintenance inside the vehicle garage at the Support Services Building (refer to Appendix B, Photograph 42). Drains inside the vehicle garage are routed through oil/water separators and connect to the sanitary sewer system (refer to Appendix B, Photograph 43).

At the Support Services Building, the Inspectors observed a salt and sand pile that was contained and covered; a fueling station; a double-walled fuel tank; two uncovered dumpsters; and vehicle and equipment storage located in the loading dock area (refer to Appendix B, Photographs 44 through 51). A spill kit was observed inside the Support Service Building (refer to Appendix B, Photograph 52). The Inspectors observed aggregates and topsoil stored outdoors at the Wage-Grade Building, located just north of the Support Services Building (refer to Appendix B, Photograph 53). A newly installed stormwater basin was observed on the south side of the Wage-Grade Building (refer to Appendix B, Photographs 54 and 55).

The Inspectors observed Outlet Nos. 004 through 009 and the accompanying BMPs. All stormwater basins appeared to be structurally functional, vegetated, free of trash and debris, and outlets appeared to be structurally functional. Flow was not observed at any of the outlets; there was moderate precipitation at the time of the inspection. No sediment, debris, trash, or other pollutants were observed at or downstream of the outlets.

III. Observations

Wastewater Treatment

Permit Section A.001 (Discharge Limitations and Monitoring Requirements)

Permit Section A.001 defines effluent discharge limits and monitoring requirements for Outlet No. 001. Outlet No. 001 is the point of discharge for the WWTP.

Observation 1. According to the discharge monitoring report (DMR) data in EPA's Integrated Compliance Information System (ICIS) database, the WWTP experienced 63 effluent limit exceedances as well as 24 failures to meet minimum percent removal requirements for BOD and TSS between September 1, 2016, and August 31, 2021 (refer to Appendix C, Exhibit 1 and Table 3 below). EPA's Enforcement and Compliance History Online (ECHO) database indicates the Facility was in a state of significant noncompliance (SNC) between July 1, 2018, and September 30, 2020, as well as between January 1, 2021, and June 30, 2021 (refer to Appendix C, Exhibit 2).

Table 3: Summary of WWTP Effluent Exceedances (September 1, 2016, through August 31, 2021)

Permit #	Monitoring Period End Date	Parameter Name	DMR Value	Permit Limit	Units	Limit Type
WV0105112	8/31/2021	TSS	56	20.5	lbs/day	Ave. Monthly
WV0105112	8/31/2021	TSS	98.7	41.1	lbs/day	Max. Daily
WV0105112	8/31/2021	Zinc, total recoverable	0.19	0.075	mg/L	Ave. Monthly
WV0105112	8/31/2021	Copper, total recoverable	0.12	0.012	mg/L	Ave. Monthly
WV0105112	8/31/2021	Copper, total recoverable	0.12	0.023	mg/L	Max. Daily
WV0105112	8/31/2021	% Removal BOD	71	85	%	Ave. Monthly Minimum
WV0105112	8/31/2021	% Removal TSS	14	85	%	Ave. Monthly Minimum

Permit #	Monitoring Period End Date	Parameter Name	DMR Value	Permit Limit	Units	Limit Type
WV0105112	7/31/2021	Copper, total recoverable	0.068	0.012	mg/L	Ave. Monthly
WV0105112	7/31/2021	Copper, total recoverable	0.068	0.023	mg/L	Max. Daily
WV0105112	7/31/2021	Total Residual Chlorine	50	0.028	mg/L	Ave. Monthly
WV0105112	7/31/2021	Total Residual Chlorine	50	0.057	mg/L	Max. Daily
WV0105112	7/31/2021	Flow	0.18	0.082	MGD	Max. Daily
WV0105112	6/30/2021	Copper, total recoverable	0.053	0.012	mg/L	Ave. Monthly
WV0105112	6/30/2021	Copper, total recoverable	0.053	0.023	mg/L	Max. Daily
WV0105112	6/30/2021	% Removal BOD	52	85	%	Ave. Monthly Minimum
WV0105112	6/30/2021	% Removal TSS	25	85	%	Ave. Monthly Minimum
WV0105112	5/31/2021	Zinc, total recoverable	0.084	0.075	mg/L	Ave. Monthly
WV0105112	5/31/2021	Copper, total recoverable	0.057	0.012	mg/L	Ave. Monthly
WV0105112	5/31/2021	Copper, total recoverable	0.057	0.023	mg/L	Max. Daily
WV0105112	5/31/2021	% Removal BOD	0	85	%	Ave. Monthly Minimum
WV0105112	5/31/2021	% Removal TSS	80	85	%	Ave. Monthly Minimum
WV0105112	4/30/2021	Zinc, total recoverable	0.136	0.075	mg/L	Ave. Monthly
WV0105112	4/30/2021	Copper, total recoverable	0.0292	0.012	mg/L	Ave. Monthly
WV0105112	4/30/2021	Copper, total recoverable	0.0292	0.023	mg/L	Max. Daily
WV0105112	4/30/2021	% Removal BOD	69	85	%	Ave. Monthly Minimum
WV0105112	4/30/2021	% Removal TSS	65	85	%	Ave. Monthly Minimum
WV0105112	3/31/2021	Zinc, total recoverable	0.116	0.075	mg/L	Ave. Monthly
WV0105112	3/31/2021	Copper, total recoverable	0.0468	0.012	mg/L	Ave. Monthly
WV0105112	3/31/2021	Copper, total recoverable	0.0468	0.023	mg/L	Max. Daily
WV0105112	3/31/2021	% Removal BOD	19	85	%	Ave. Monthly Minimum
WV0105112	3/31/2021	% Removal TSS	42	85	%	Ave. Monthly Minimum
WV0105112	2/28/2021	Zinc, total recoverable	0.11	0.075	mg/L	Ave. Monthly
WV0105112	2/28/2021	Copper, total recoverable	0.028	0.012	mg/L	Ave. Monthly
WV0105112	2/28/2021	Copper, total recoverable	0.028	0.023	mg/L	Max. Daily
WV0105112	2/28/2021	% Removal BOD	78	85	%	Ave. Monthly Minimum

Permit #	Monitoring Period End Date	Parameter Name	DMR Value	Permit Limit	Units	Limit Type
WV0105112	2/28/2021	% Removal TSS	50	85	%	Ave. Monthly Minimum
WV0105112	1/31/2021	Zinc, total recoverable	0.141	0.075	mg/L	Ave. Monthly
WV0105112	1/31/2021	Copper, total recoverable	0.079	0.012	mg/L	Ave. Monthly
WV0105112	1/31/2021	Copper, total recoverable	0.079	0.023	mg/L	Max. Daily
WV0105112	1/31/2021	% Removal BOD	65	85	%	Ave. Monthly Minimum
WV0105112	1/31/2021	% Removal TSS	64	85	%	Ave. Monthly Minimum
WV0105112	12/31/2020	% Removal TSS	0	85	%	Ave. Monthly Minimum
WV0105112	11/30/2020	% Removal BOD	79	85	%	Ave. Monthly Minimum
WV0105112	11/30/2020	% Removal TSS	36	85	%	Ave. Monthly Minimum
WV0105112	10/31/2020	% Removal BOD	37	85	%	Ave. Monthly Minimum
WV0105112	10/31/2020	% Removal TSS	50	85	%	Ave. Monthly Minimum
WV0105112	9/30/2020	Zinc, total recoverable	0.091	0.075	mg/L	Ave. Monthly
WV0105112	9/30/2020	Copper, total recoverable	0.016	0.012	mg/L	Ave. Monthly
WV0105112	9/30/2020	% Removal BOD	27	85	%	Ave. Monthly Minimum
WV0105112	8/31/2020	% Removal BOD	52	85	%	Ave. Monthly Minimum
WV0105112	8/31/2020	% Removal TSS	53	85	%	Ave. Monthly Minimum
WV0105112	7/31/2020	Copper, total recoverable	0.049	0.012	mg/L	Ave. Monthly
WV0105112	7/31/2020	Copper, total recoverable	0.049	0.023	mg/L	Max. Daily
WV0105112	6/30/2020	TSS	35	30	mg/L	Ave. Monthly
WV0105112	6/30/2020	Copper, total recoverable	0.095	0.012	mg/L	Ave. Monthly
WV0105112	6/30/2020	Copper, total recoverable	0.095	0.023	mg/L	Max. Daily
WV0105112	5/31/2020	Copper, total recoverable	0.033	0.012	mg/L	Ave. Monthly
WV0105112	5/31/2020	Copper, total recoverable	0.033	0.023	mg/L	Max. Daily
WV0105112	4/30/2020	Copper, total recoverable	0.017	0.012	mg/L	Ave. Monthly
WV0105112	3/31/2020	Copper, total recoverable	0.017	0.012	mg/L	Ave. Monthly
WV0105112	2/29/2020	Zinc, total recoverable	0.094	0.075	mg/L	Ave. Monthly
WV0105112	2/29/2020	Copper, total recoverable	0.038	0.012	mg/L	Ave. Monthly
WV0105112	2/29/2020	Copper, total recoverable	0.038	0.023	mg/L	Max. Daily

Permit #	Monitoring Period End Date	Parameter Name	DMR Value	Permit Limit	Units	Limit Type
WV0105112	1/31/2020	Zinc, total recoverable	0.25	0.075	mg/L	Ave. Monthly
WV0105112	1/31/2020	Zinc, total recoverable	0.25	0.194	mg/L	Max. Daily
WV0105112	1/31/2020	Copper, total recoverable	0.03	0.012	mg/L	Ave. Monthly
WV0105112	1/31/2020	Copper, total recoverable	0.03	0.023	mg/L	Max. Daily
WV0105112	12/31/2019	Copper, total recoverable	0.21	0.012	mg/L	Ave. Monthly
WV0105112	12/31/2019	Fecal Coliform	5,000	200	#/100mL	Monthly Geometric Mean
WV0105112	12/31/2019	Fecal Coliform	5,000	400	#/100mL	Max. Daily
WV0105112	11/30/2019	% Removal TSS	49.5	85	%	Ave. Monthly Minimum
WV0105112	8/31/2019	BOD	64.7	30	mg/L	Ave. Monthly
WV0105112	8/31/2019	BOD	64.7	60	mg/L	Max. Daily
WV0105112	8/31/2019	Fecal Coliform	600	400	#/100mL	Max. Daily
WV0105112	8/31/2019	% Removal BOD	73	85	%	Ave. Monthly Minimum
WV0105112	7/31/2019	Copper, total recoverable	0.039	0.029	mg/L	Ave. Monthly
WV0105112	5/31/2019	Copper, total recoverable	0.038	0.029	mg/L	Ave. Monthly
WV0105112	2/28/2019	Copper, total recoverable	0.031	0.029	mg/L	Ave. Monthly
WV0105112	1/31/2019	Copper, total recoverable	0.034	0.029	mg/L	Ave. Monthly
WV0105112	12/31/2018	Zinc, total recoverable	0.264	0.24	mg/L	Ave. Monthly
WV0105112	3/31/2018	Zinc, total recoverable	0.273	0.24	mg/L	Ave. Monthly
WV0105112	1/31/2018	Zinc, total recoverable	0.344	0.24	mg/L	Ave. Monthly
WV0105112	1/31/2018	Copper, total recoverable	0.03	0.029	mg/L	Ave. Monthly
WV0105112	3/31/2017	Zinc, total recoverable	0.335	0.24	mg/L	Ave. Monthly
WV0105112	11/30/2016	Zinc, total recoverable	0.29	0.24	mg/L	Ave. Monthly
WV0105112	10/31/2016	Copper, total recoverable	0.163	0.029	mg/L	Ave. Monthly
WV0105112	10/31/2016	Copper, total recoverable	0.163	0.067	mg/L	Max. Daily

It should be noted that 20 instances where the WWTP failed to meet percent removal requirements for BOD or TSS from March 2020 through the date of the inspection, the Facility did not exceed effluent loading or concentration limits for those parameters. These instances occurred in months impacted by the COVID-19 pandemic, when influent loadings were low, requiring little to no influent wastewater treatment to meet effluent limits for BOD and TSS.

The WWTP failed to meet the percent removal requirement for TSS and exceeded TSS loading limits in August 2021. This corresponds to the general time period when Oxidation Ditch No. 2 failed and operation switched to

Oxidation Ditch No.1 after 18 months of dormancy (see Observation 8). The Facility was unable to provide the exact timing of this event as it was not documented in the operator log sheets and the previous operator was no longer employed at the WWTP.

Observation 2. The Lead Plant Operator sampled for and measured chlorine residual in the effluent after dechlorination at the time of the inspection. The result was 0.42 parts per million (ppm), which exceeds the maximum daily effluent limit (refer to Appendix B, Photographs 34 through 36). After the Inspectors left the WWTP, the Lead Plant Operator stated that he was able to find and repair a clog in the sodium sulfite line that was preventing proper dechlorination.

Observation 3. The notes in Permit Section A.001 state that "This discharge [i.e., from Outlet No. 001] shall not cause violation of Title 47, Series 2, Section 3, of the West Virginia Legislative Rules." Title 47, Series 2, Section 3, Part 3.2 of the West Virginia Legislative Rules states that no sewage, industrial wastes, or other wastes present in any of the waters of the State shall cause distinctly visible floating or settleable solids, suspended solids, scum, foam, or oily slicks.

At the time of the inspection, the Inspectors observed foaming in the effluent discharge chamber and at Outlet No. 001 in the Potomac River (refer to Appendix B, Photographs 12 through 15).

Permit Section B (Schedule of Compliance)

The Permittee was required to submit and implement a Plan of Action on obtaining compliance for copper and zinc at Outlet No. 001 according to the schedule in Figure 1.

Mar 01, 2018:	The permittee shall submit a Plan of Action on obtaining compliance for copper and zinc at Outlet No. 001 (final effluent limitations).
Jun 01, 2018:	The permittee shall submit a Quarterly Progress Report which summarizes the actions taken and any additional actions to be taken in the future to achieve the Final Effluent Limitations for copper and zinc at Outlet No. 001.
Sep 01, 2018:	The permittee shall submit a Quarterly Progress Report which summarizes the actions taken and any additional actions to be taken in the future to achieve the Final Effluent Limitations for copper and zinc at Outlet No. 001.
Dec 01, 2018:	The permittee shall submit a Quarterly Progress Report which summarizes the actions taken and any additional actions to be taken in the future to achieve the Final Effluent Limitations for copper and zinc at Outlet No. 001.
Mar 01, 2019:	The permittee shall submit a Quarterly Progress Report which summarizes the actions taken and any additional actions to be taken in the future to achieve the Final Effluent Limitations for copper and zinc at Outlet No. 001.
Jun 01, 2019:	The permittee shall submit a Quarterly Progress Report which summarizes the actions taken and any additional actions to be taken in the future to achieve the Final Effluent Limitations for copper and zinc at Outlet No. 001.
Sep 01, 2019:	The permittee shall submit a Quarterly Progress Report which summarizes the actions taken and any additional actions to be taken in the future to achieve the Final Effluent Limitations for copper and zinc at Outlet No. 001.
Dec 01, 2019:	The permittee shall achieve final permit limitations for copper and zinc at Outlet No. 001.

Figure 1. Outlet No. 1 zinc and copper compliance schedule (Permit Part B).

Observation 4. At the time of the inspection, the Permittee had not submitted a Plan of Action for obtaining compliance for copper and zinc at Outlet No. 001. The Facilities Management Branch Manager stated that USFWS had hired an engineer to develop the plan, and the project was in a feasibility planning phase at the time of the inspection. As shown in Table 3, the Facility has routinely exceeded copper and zinc effluent concentration limits over the five years preceding the inspection (52 total copper and zinc exceedances in five years).

Observation 5. While reviewing the Facility's DMR data in ICIS, Inspectors observed that data were not submitted for Outlet No. 002 for the months of January, March, April, May, and June of 2017.

The Permit states that effluent at Outlet No. 002 (laboratory fish tank discharge) must be monitored once per month and effluent at Outlet Nos. 004 through 009 must be monitored once every six months.

Facility representatives stated that Outlet No. 002 effluent had been routed to the sanitary sewer and has not discharged directly to the Potomac River since before the current Permit term; however, Facility representatives did not know the exact date Outlet No. 002 was disconnected.

Permit Section C.7 (Other Requirements)

The required DMRs shall be received by the agency no later than 20 days following the end of the reporting period in accordance with the following requirements.

Observation 6. While reviewing the Facility's DMR data in ICIS, the Inspectors observed 55 occurrences between all eight outlets of DMRs that were submitted after 20 days following the end of the reporting period (see Table 4). This observation was made during records review following the inspection and was not discussed onsite with Facility representatives.

It is worth noting that the effluent characteristics that are required to be monitored that are not listed in Table 4 during the listed corresponding monitoring periods were not included in the ICIS database. Data that were included in the ICIS database that had not been submitted by the Permittee are described in Observation 5.

Table 4: Late DMR Submittal Summary

Outlet No.	Parameters	DMR Due Date	DMR Received Date	Number of days late
001	BOD, 5-day, 20 deg. C/ pH/ Solids, total suspended/ Nitrogen, total [as N]/ Nitrogen, Kjeldahl, total [as N]/ Phosphorus, total [as P]/ Zinc, total recoverable/ Copper, total recoverable/ Flow, in conduit or thru treatment plant/ Chlorine, total residual/ Coliform, fecal general/ BOD, 5-day, percent removal/ Solids, suspended percent removal	January 31, 2017	February 21, 2017	1
002	BOD, 5-day, 20 deg. C/ pH/ Solids, total suspended/ Nitrogen, total [as N]/ Nitrogen, Kjeldahl, total [as N]/ Phosphorus, total [as P]/ Flow, in conduit or thru treatment plant/ Coliform, fecal general	February 28, 2017	April 14, 2017	25
005/ 006/ 008	pH/ Solids, total suspended/ Oil and grease, hexane extr method/ Flow, in conduit or thru treatment plant	February 28, 2017	May 17, 2017	58
002	BOD, 5-day, 20 deg. C/ pH/ Solids, total suspended/ Nitrogen, total [as N]/ Nitrogen, Kjeldahl, total [as N]/ Phosphorus, total [as P]/ Flow, in conduit or thru treatment plant/ Coliform, fecal general	July 31, 2017	July 19, 2019	698

Outlet No.	Parameters	DMR Due Date	DMR Received Date	Number of days late
002	BOD, 5-day, 20 deg. C/ pH/ Solids, total suspended/ Nitrogen, total [as N]/ Nitrogen, Kjeldahl, total [as N]/ Phosphorus, total [as P]/ Flow, in conduit or thru treatment plant/ Coliform, fecal general	August 31, 2017	July 19, 2019	667
004/ 006/ 007/ 008/ 009	pH/ Solids, total suspended/ Oil and grease, hexane extr method/ Flow, in conduit or thru treatment plant	August 31, 2017	July 19, 2019	667
005	pH/ Solids, total suspended/ Oil and grease, hexane extr method/ Flow, in conduit or thru treatment plant	August 31, 2017	May 3, 2018	225
001	BOD, 5-day, 20 deg. C/ pH/ Solids, total suspended/ Nitrogen, total [as N]/ Nitrogen, Kjeldahl, total [as N]/ Phosphorus, total [as P]/ Zinc, total recoverable/ Copper, total recoverable/ Flow, in conduit or thru treatment plant/ Chlorine, total residual/ Coliform, fecal general/ BOD, 5-day, percent removal/ Solids, suspended percent removal	August 31, 2017	November 16, 2017	57
002	BOD, 5-day, 20 deg. C/ pH/ Solids, total suspended/ Nitrogen, total [as N]/ Nitrogen, Kjeldahl, total [as N]/ Phosphorus, total [as P]/ Flow, in conduit or thru treatment plant/ Coliform, fecal general	September 30, 2017	July 19, 2019	637
002	BOD, 5-day, 20 deg. C/ pH/ Solids, total suspended/ Nitrogen, total [as N]/ Nitrogen, Kjeldahl, total [as N]/ Phosphorus, total [as P]/ Flow, in conduit or thru treatment plant/ Coliform, fecal general	October 31, 2017	July 19, 2019	606
002	BOD, 5-day, 20 deg. C/ pH/ Solids, total suspended/ Nitrogen, total [as N]/ Nitrogen, Kjeldahl, total [as N]/ Phosphorus, total [as P]/ Flow, in conduit or thru treatment plant/ Coliform, fecal general	November 30, 2017	July 19, 2019	576
004/ 005/ 006/ 007/ 008/ 009	pH/ Solids, total suspended/ Oil and grease, hexane extr method/ Iron, total recoverable/ Flow, in conduit or thru treatment plant	November 30, 2019	January 23, 2020	34
004/ 005/ 006/ 007/ 008/ 009	pH/ Solids, total suspended/ Oil and grease, hexane extr method/ Iron, total recoverable/ Flow, in conduit or thru treatment plant	May 31, 2020	August 19, 2020	60
002	BOD, 5-day, 20 deg. C/ pH/ Solids, total suspended/ Nitrogen, total [as N]/ Nitrogen, Kjeldahl, total [as N]/ Phosphorus, total [as P]/ Flow, in conduit or thru treatment plant/ Coliform, fecal general	October 31, 2020	November 22, 2020	2
001	Temperature, water deg. Fahrenheit (all three characteristics)/ BOD, 5-day, 20 deg. C/ pH/ Solids, total suspended/ Nitrogen, total [as N]/ Nitrogen, Kjeldahl, total [as N]/ Phosphorus, total [as P]/ Zinc, total recoverable/ Copper, total recoverable/ Flow, in conduit or thru treatment plant/ Chlorine, total residual/ Coliform, fecal general/ BOD, 5-day, percent removal/ Solids, suspended percent removal	October 31, 2020	November 27, 2020	7
002	BOD, 5-day, 20 deg. C/ pH/ Solids, total suspended/ Nitrogen, total [as N]/ Nitrogen, Kjeldahl, total [as N]/ Phosphorus, total [as P]/ Flow, in conduit or thru treatment plant/ Coliform, fecal general	November 30, 2020	December 23, 2020	3
004/ 005/ 006/ 007/ 008/ 009	pH/ Solids, total suspended/ Oil and grease, hexane extr method/ Iron, total recoverable/ Flow, in conduit or thru treatment plant	November 30, 2020	January 4, 2021	15
001	Temperature, water deg. Fahrenheit (all three characteristics)/ BOD, 5-day, 20 deg. C/ pH/ Solids, total suspended/ Nitrogen, total [as N]/ Nitrogen, Kjeldahl, total [as N]/ Phosphorus, total [as P]/ Zinc, total recoverable/ Copper, total recoverable/ Flow, in conduit or thru treatment plant/ Chlorine, total residual/ Coliform, fecal general/ BOD, 5-day, percent removal/ Solids, suspended percent removal	November 30, 2020	December 23, 2020	3
002	BOD, 5-day, 20 deg. C/ pH/ Solids, total suspended/ Nitrogen, total [as N]/ Nitrogen, Kjeldahl, total [as N]/ Phosphorus, total [as P]/ Flow, in conduit or thru treatment plant/ Coliform, fecal general	January 31, 2021	February 22, 2021	2
001	Temperature, water deg. Fahrenheit (all three characteristics)/ BOD, 5-day, 20 deg. C/ pH/ Solids, total suspended/ Nitrogen, total [as N]/ Nitrogen, Kjeldahl, total [as N]/ Phosphorus, total [as P]/ Zinc, total recoverable/ Copper, total recoverable/ Flow, in conduit or thru treatment plant/ Chlorine, total residual/ Coliform, fecal general/ BOD, 5-day, percent removal/ Solids, suspended percent removal	January 31, 2021	February 22, 2021	2

Outlet No.	Parameters	DMR Due Date	DMR Received Date	Number of days late
002	BOD, 5-day, 20 deg. C/ pH/ Solids, total suspended/ Nitrogen, total [as N]/ Nitrogen, Kjeldahl, total [as N]/ Phosphorus, total [as P]/ Flow, in conduit or thru treatment plant/ Coliform, fecal general	February 28, 2021	March 24, 2021	4
001	Temperature, water deg. Fahrenheit (all three characteristics)/ BOD, 5-day, 20 deg. C/ pH/ Solids, total suspended/ Nitrogen, total [as N]/ Nitrogen, Kjeldahl, total [as N]/ Phosphorus, total [as P]/ Zinc, total recoverable/ Copper, total recoverable/ Flow, in conduit or thru treatment plant/ Chlorine, total residual/ Coliform, fecal general/ BOD, 5-day, percent removal/ Solids, suspended percent removal	February 28, 2021	March 24, 2021	4
001	Temperature, water deg. Fahrenheit (all three characteristics)/ BOD, 5-day, 20 deg. C/ pH/ Solids, total suspended/ Nitrogen, total [as N]/ Nitrogen, Kjeldahl, total [as N]/ Phosphorus, total [as P]/ Zinc, total recoverable/ Copper, total recoverable/ Flow, in conduit or thru treatment plant/ Chlorine, total residual/ Coliform, fecal general/ BOD, 5-day, percent removal/ Solids, suspended percent removal/ Lead, total recoverable	March 31, 2021	April 21, 2021	1
002	BOD, 5-day, 20 deg. C/ pH/ Solids, total suspended/ Nitrogen, total [as N]/ Nitrogen, Kjeldahl, total [as N]/ Phosphorus, total [as P]/ Flow, in conduit or thru treatment plant/ Coliform, fecal general	May 31, 2021	June 23, 2021	3
004/ 005/ 006/ 007/ 008/ 009	pH/ Solids, total suspended/ Oil and grease, hexane extr method/ Iron, total recoverable/ Flow, in conduit or thru treatment plant	May 31, 2021	September 15, 2021	87
001	Temperature, water deg. Fahrenheit (all three characteristics)/ BOD, 5-day, 20 deg. C/ pH/ Solids, total suspended/ Nitrogen, total [as N]/ Nitrogen, Kjeldahl, total [as N]/ Phosphorus, total [as P]/ Zinc, total recoverable/ Copper, total recoverable/ Flow, in conduit or thru treatment plant/ Chlorine, total residual/ Coliform, fecal general/ BOD, 5-day, percent removal/ Solids, suspended percent removal	May 31, 2021	June 23, 2021	3
002	BOD, 5-day, 20 deg. C/ pH/ Solids, total suspended/ Nitrogen, total [as N]/ Nitrogen, Kjeldahl, total [as N]/ Phosphorus, total [as P]/ Flow, in conduit or thru treatment plant/ Coliform, fecal general	July 31, 2021	August 30, 2021	10
001	Temperature, water deg. Fahrenheit (all three characteristics)/ BOD, 5-day, 20 deg. C/ pH/ Solids, total suspended/ Nitrogen, total [as N]/ Nitrogen, Kjeldahl, total [as N]/ Phosphorus, total [as P]/ Zinc, total recoverable/ Copper, total recoverable/ Flow, in conduit or thru treatment plant/ Chlorine, total residual/ Coliform, fecal general/ BOD, 5-day, percent removal/ Solids, suspended percent removal	July 31, 2021	August 24, 2021	4
001	Temperature, water deg. Fahrenheit (all three characteristics)/ BOD, 5-day, 20 deg. C/ pH/ Solids, total suspended/ Nitrogen, total [as N]/ Nitrogen, Kjeldahl, total [as N]/ Phosphorus, total [as P]/ Zinc, total recoverable/ Copper, total recoverable/ Flow, in conduit or thru treatment plant/ Chlorine, total residual/ Coliform, fecal general/ BOD, 5-day, percent removal/ Solids, suspended percent removal	August 31, 2021	September 23, 2021	3

Appendix A, Part II.1 (Proper Operation and Maintenance)

The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls, and appropriate quality assurance procedures. Unless otherwise required by Federal or State law, this provision requires the operation of back-up auxiliary facilities or similar systems which are installed by the permittee only when the operation is necessary to achieve compliance with the conditions of the permit. For domestic waste treatment facilities, waste treatment operators as classified by the WV Bureau of Public Health Laws, W. Va. Code Chapter 16-1, will be required except that in circumstances where the

domestic waste treatment facility is receiving any type of industrial waste, the Director may require a more highly skilled operator.

Observation 7. The Lead Plant Operator stated that the influent and effluent flow meters were not functioning properly at the time of the inspection. He stated that a calibration contractor had visited the WWTP in the month prior to the inspection and the meters failed calibration/certification. He stated that during August and September 2021, he was using potable water usage rates to estimate flows through the WWTP. Snyder Environmental Services (SES) had only been operating the WWTP since early August 2021, and the Lead Plant Operator was unsure how the previous operator was determining flow or how long the meters had been malfunctioning.

While reviewing the Facility's DMR data in ICIS, the Inspectors observed that for 37 of 38 months between May 2018 and June 2021, the Permittee reported the same value for average monthly and maximum daily flows for each reporting period (see Table 5). This scenario is unlikely due to the changing number of people onsite each day and the dynamic nature of daily flows in the sewer system. This is more likely due to a reporting error or instrument malfunction. This observation was made during records review following the inspection and not discussed onsite with Facility representatives.

Table 5: WWTP Effluent Data Showing Matching Monthly Average and Maximum Daily Flows (September 1, 2016, through August 31, 2021)

Permit No.	Monitoring Period End Date	Outlet No.	Parameter	Ave. Monthly	Max. Daily	Units
WV0105112	06/30/2021	001	Flow	.0051	.0051	MGD
WV0105112	05/31/2021	001	Flow	.0054	.0054	MGD
WV0105112	04/30/2021	001	Flow	.0048	.0048	MGD
WV0105112	03/31/2021	001	Flow	.003	.003	MGD
WV0105112	02/28/2021	001	Flow	.0042	.0042	MGD
WV0105112	01/31/2021	001	Flow	.0033	.0033	MGD
WV0105112	12/31/2020	001	Flow	.005	.005	MGD
WV0105112	11/30/2020	001	Flow	.0058	.0058	MGD
WV0105112	10/31/2020	001	Flow	.0103	.0103	MGD
WV0105112	09/30/2020	001	Flow	.02	.02	MGD
WV0105112	08/31/2020	001	Flow	.0092	.0092	MGD
WV0105112	07/31/2020	001	Flow	.0169	.0169	MGD
WV0105112	06/30/2020	001	Flow	.0179	.0179	MGD
WV0105112	05/31/2020	001	Flow	.004	.004	MGD
WV0105112	04/30/2020	001	Flow	.0028	.0028	MGD
WV0105112	03/31/2020	001	Flow	.0102	.0102	MGD
WV0105112	02/29/2020	001	Flow	.009	.009	MGD
WV0105112	01/31/2020	001	Flow	.0142	.0142	MGD
WV0105112	12/31/2019	001	Flow	.014	.014	MGD
WV0105112	11/30/2019	001	Flow	.0183	.0183	MGD
WV0105112	10/31/2019	001	Flow	.0258	.0258	MGD
WV0105112	09/30/2019	001	Flow	.0244	.0244	MGD
WV0105112	08/31/2019	001	Flow	.0178	.0178	MGD
WV0105112	07/31/2019	001	Flow	.021	.021	MGD
WV0105112	06/30/2019	001	Flow	.0141	.0141	MGD

Permit No.	Monitoring Period End Date	Outlet No.	Parameter	Ave. Monthly	Max. Daily	Units
WV0105112	05/31/2019	001	Flow	.0182	.0182	MGD
WV0105112	04/30/2019	001	Flow	.016	.016	MGD
WV0105112	03/31/2019	001	Flow	.0144	.0144	MGD
WV0105112	02/28/2019	001	Flow	.0104	.0104	MGD
WV0105112	01/31/2019	001	Flow	.0073	.0073	MGD
WV0105112	12/31/2018	001	Flow	.0137	.0137	MGD
WV0105112	11/30/2018	001	Flow	.0106	.0121	MGD
WV0105112	10/31/2018	001	Flow	.0299	.0299	MGD
WV0105112	09/30/2018	001	Flow	.0234	.0234	MGD
WV0105112	08/31/2018	001	Flow	.0392	.0392	MGD
WV0105112	07/31/2018	001	Flow	.0364	.0364	MGD
WV0105112	05/31/2018	001	Flow	.019	.019	MGD

Observation 8. The Inspectors observed several issues related to proper operation and maintenance (O&M) at the WWTP, including:

- The Lead Plant Operator stated that WWTP O&M manual was not located at the WWTP and he was unsure where it was.
- Operator certifications were not kept onsite. Facility representatives provided this documentation following the inspection (refer to Appendix C, Exhibit 3).
- The influent and effluent flow meters were not working at the time of the inspection. The Lead Plant Operator stated that the Permittee estimates flow based on water use on campus.
- Due to the COVID-19 pandemic, the majority of the influent to the WWTP was cooling tower blow down and cleaning product waste from janitorial operations. The Lead Plant Operator stated that this has resulted in low BOD, low sludge volumes, and failing biology in the plant. The operators started adding a biological supplement to the oxidation ditch in August and are costing a carbon source, likely MicroC®, to help keep the plant biology working more effectively until the conference center begins normal operations and the plant starts receiving normal flows again.
- The Lead Plant Operator took a clarifier sludge judge measurement of 8 inches at the time of the inspection (refer to Appendix B, Photograph 6). He stated, ideally, there would be a 12-inch sludge blanket. He also stated he had recently observed measurements lower than the 8 inches observed on the day of the inspection.
- The Lead Plant Operator stated that the Facility had not been wasting solids for most of the pandemic due to low solids loadings; however, he was unsure for exactly how long.

- RAS Pump No. 1 was out of service at the time of the inspection (refer to Appendix B, Photograph 38).
- The Facility's influent rotary screen was out of service, and according to Facility representatives, had been for years (refer to Appendix B, Photograph 1).
- Oxidation Ditch No. 2 was out of service at the time of the inspection. Facility representatives explained that the bearings in the clarifier drive had failed and the rake apparatus broke. They explained that the oxidation ditches should have been alternated every 6 months; however, Oxidation Ditch No. 2 had been left to run for 18 months without a maintenance interval, until it failed.
- As stated previously, after determining disinfection was not working in the chlorine contact chamber, the Lead Plant Operator discovered a clog in the sodium sulfite line that was preventing the solution from injecting into the effluent.
- Lock-out tags were not used on the Facility's motor control center (MCC) for the out-of-service Oxidation Ditch No. 2 and associated equipment (e.g., clarifier components; refer to Appendix B, Photographs 39 through 41). Additionally, lock-out tags and locks installed for the waste pumps were not dated or initialed (refer to Appendix B, Photograph 41). It was unclear how long the pumps had been turned off.
- At the time of the inspection, the operators were utilizing both chlorine and UV light disinfection in the chlorine contact chamber (refer to Appendix B, Photograph 9). The Lead Plant Operator stated that the UV system was being tested to see if it would be effective; however, he believed the effluent was too cloudy for UV to work correctly.

Observation 9. The WWTP had undergone recent operational staff changes at the time of the inspection. The contract operator at the WWTP, Raven, had brought on a new subcontract operator, SES, on August 3, 2021, due to an unexpected staff departure. Additionally, a new contract operator (CMI) was scheduled to be taking over on October 1, 2021. It was unclear at the time of the inspection whether CMI would be retaining SES as the operational subcontractor.

Stormwater Management

A.002 through 009 (Discharge Limitations and Monitoring Requirements)

Samples taken: In compliance with the monitoring requirements specified above shall be taken at the following location(s):

[Stormwater Discharge] Effluent samples shall be collected at, or as near as possible to the point of discharge.

Permit Section C.14.d (Other Requirements)

When the concentration results from a minimum of four consecutive samples of a pollutant are all less than the corresponding benchmark value for the pollutant, additional monitoring for the pollutant is not required (all pH values of the samples must be within the range 6.0 to 9.0 S.U.). The facility shall submit, each year, to the Division of Water and Waste Management, in lieu of the monitoring data, a certification (form will be provided upon request) that there has not been a significant change in the industrial activity or the pollution prevention measures in the area of the facility that drains to the outlet for which sampling is to be waived.

Observation 10. Based on a review of the ICIS database, DMRs were not submitted for Outlet Nos. 004, 007, and 009 for the first six months of 2017. The Permit states that effluent at Outlet Nos. 004 through 009 must be monitored once every six months.

The Inspectors observed Outlet No. 009 to be plugged at the time of the inspection (refer to Appendix B, Photographs 26 and 27). Facility representatives stated that the outlet pipe was plugged about 10 years prior to the inspection. The Permittee provided a document titled, "Groundwater Protection Plan and Best Management Practices," which Facility representatives explained functions as both the Facility's storm water pollution prevention plan (SWPPP) and the Groundwater Protection Plan (GPP) (hereinafter referred to as the GPP/SWPPP document; refer to Appendix C, Exhibit 4). The GPP/SWPPP document states that the Outlet No. 009 pond was originally installed with a sand/peat filter at the southern end of the BMP. The pond receives runoff from surrounding roads, parking lots, and the Ding Darling Lodge; however, at the time of the inspection, all runoff that was captured by the pond infiltrated and did not discharge.

Moderate precipitation was experienced during the inspection, and no flow was observed from any of the outlets. No Discharge was reported during the entirety of the Permit term for Outlet Nos. 004, 007, and 009. Discharge was reported for Outlet Nos. 005, 006, and 008.

At the time of the inspection, the Permittee had not submitted any request or documentation to WVDEP pursuing a waiver for monitoring at Outlet No. 009.

Permit Section C.01 (Other Requirements)

The permittee shall practice good housekeeping including maintaining the facility grounds. There shall be no scattered parts, equipment, debris, etc. Any and all drums shall be either stored in a covered area or kept upon pallets and properly sealed.

Observation 11. Two uncovered dumpsters were observed in the Support Services Building yard. One dumpster was filled to capacity with trash (refer to Appendix B, Photograph 47). Facility representatives stated that a pick-up had been scheduled for earlier in the week, but a miscommunication led to a cancellation. The other dumpster contained scrap metal; rust stains were observed next to the scrap metal dumpster (refer to Appendix B, Photographs

48 and 49). Facility representatives stated that they could request covers for the dumpsters from their hauler.

Observation 12. Uncovered material was observed at the Support Services Building on the southern perimeter of the loading dock (refer to Appendix B, Photograph 50).

Permit Section C.13 (Other Requirements)

The permittee shall maintain and implement the storm water pollution prevention plan (SWPPP) for the site. The SWPPP shall be prepared in accordance with good engineering practices. The SWPPP shall identify potential sources of pollution which may reasonably be expected to affect the quality of storm water discharges associated with the industrial activity. In addition, the plan shall describe and ensure the implementation of practices which are to be used to reduce the pollutants in storm water discharges associated with the industrial activity at the facility and to assure compliance with the terms and conditions of this permit.

Observation 13. The GPP/SWPPP document does not include detailed information on O&M requirements and frequency of maintenance for stormwater infrastructure and BMPs. Specifically, the GPP/SWPPP document does not include a description of the maintenance activities or frequency of maintenance to be performed on the oil/water separators and associated equipment at the Support Services Building, the Wage-Grade Building oil water separator and stormwater basin, the centralized stormwater ponds/BMPs, or at the outlets.

Section 4.1 of the Facility's GPP states, "Runoff control structure maintenance (e.g., cleaning oil-water separators) and regular inspections of runoff management structures (e.g., inspecting condition of swales) are important aspects of stormwater pollution prevention."

The Inspectors observed the following regarding maintenance of stormwater control and pollution prevention practices at the Facility:

- The Permittee was able to provide work order documentation showing that Facility representatives conducted quarterly inspections of outlets and ponds in November 2020, February 2021, May 2021, and July 2021, as well as a comprehensive annual inspection in September 2021 (refer to Appendix C, Exhibit 5). Inspection reports and observations from these activities were not provided.

- A sand interceptor was observed outside of the Support Services Building garage (refer to Appendix B, Photograph 56). Facility representatives were initially unsure of the structure's function. Upon review of the site plans, it was determined the sand interceptor collected liquids from floor drains inside the garage then discharged into an oil/water separator and ultimately into the sanitary sewer. Facility representatives opened the access manholes for the structure, and the Inspectors observed that the access riser space was flooded. Facility representatives initially started pumping out the riser onto the impervious surface of the yard but observed some sheen on the water surface; the pump was then directed into the downstream manhole of the separator structure (refer to Appendix B, Photographs 57 through

59). Facility representatives stated they did not believe the sand separator or the two oil/water separators in the vehicle garages had ever been maintained (i.e., inspected or pumped out).

- Erosion and scouring were observed on the embankments and filter bed of the newly installed stormwater basin at the entrance of the new Wage-Grade Building. The filter bed also lacked vegetation (refer to Appendix B, Photograph 54). Sediment was observed at the outlet south of the basin that discharges into a grass swale (refer to Appendix B, Photograph 55).

- According to Facility representatives, the oil/grit separator that discharges to Outlet No. 008 had not been maintained in at least 18 years. A layer of sediment was observed in the bottom of the influent chamber (refer to Appendix B, Photograph 33). Based on engineering drawings of the structure provided after the inspection, the depth of the sediment layer in the initial chamber was approximately 5 to 6 feet (refer to Appendix C, Exhibit 6).

Observation 14. The GPP/SWPPP document lists personnel as team members that were no longer employed at the Facility or no longer served in the specified role. Facility representatives provided an updated document after the inspection with an updated list of personnel (refer to Appendix C, Exhibit 7).

Observation 15. Section 4.1 of the GPP/SWPPP document states. "Many techniques used to reduce stormwater pollution require continuous efforts by on-site personnel. Personnel given responsibilities such as inspections, PM, scheduled maintenance, and emergency response are required to receive specific training in order to effectively accomplish their assignments."

The Facilities Management Branch Manager stated that the Permittee does not conduct routine formalized stormwater pollution prevention and good housekeeping training and that training primarily occurs on the job.

IV. Records Review

As part of the inspection process, the Inspectors reviewed records, which included the following documents:

- EPA ECHO Detailed Facility Report
- DMR data from EPA's ICIS database (September 1, 2016, through date of inspection)
- Operator log sheets (July 1, 2021, through date of inspection)
- Contract laboratory results and chain of custody forms (March 2021 through August 2021)
- Facility site maps and engineering drawings
- Written descriptions of WWTP flow and sewage collection system
- Previous WWTP inspection reports from WVDEP (November 2019 and April 2020)
- WWTP operator certifications (for SES)
- Facility work orders for WWTP maintenance/repairs and stormwater inspections
- GPP/SWPPP document (undated)

- Spill Prevention Control and Countermeasure (SPCC) Plan (dated February 2020)

V. Closing Conference

After the Facility walkthrough, the Inspectors met with the Facility representatives for a closing conference and shared preliminary observations. The Inspectors reiterated to the Facility representatives that all preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared were subject to further investigation by EPA upon the additional review of records and documentation. Additional observations may be contained in this inspection report that were not identified at the time of the closing conference after EPA reviewed additional materials following the inspection.

The inspection concluded at 11:20 a.m. on September 22, 2021.