UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1600 John F Kennedy Boulevard
Four Penn Center
Philadelphia, Pennsylvania 19103

Report Title:	Clean Water Act Compliance Inspection Report
Inspection Date(s):	08/18/2022
Regulatory Program(s):	National Pollutant Discharge Elimination System (NPDES)
Type of Activity:	Pretreatment – Industrial User Inspection
Facility Name:	Clarios Battery Distribution Center
Permittee(s):	Clarios
Facility Operator:	Clarios
Facility Address:	50 Patriot Drive, Middletown, DE, 19709
Lat/Long:	39.43932/-75.74141
County/Parish:	New Castle
Permit Number:	DEP100003
NAICS & SIC Codes:	335911/3691
Unique Project #:	3E22WN027A

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

Kelly Wright – EHS Regional Manager – Clarios ☒
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EPA Inspectors:

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I. Introduction

On August 18, 2022, Aaron Thomson (hereinafter, "Inspector Thomson", "EPA Inspector) an inspector from the U.S. Environmental Protection Agency ("EPA") Region III conducted an on-site inspection of the Clarios Battery Distribution Center's (hereinafter, "Clarios", "the facility") pretreatment program. The facility is a manufacturing plant, producing and distributing lead-acid batteries. The facility is located at 50 Patriot Drive, Middletown, DE, 19709. Clarios' designated control authority is the Environmental Protection Agency (EPA); a letter from the EPA (**Attachment 1**) detailing discharge monitoring and reporting requirements was provided by the facility. It may be noted that the facility was formerly owned by Johnson Controls, but was purchased by Clarios, who continued production at the plant, leaving the permit and process unchanged. The date on the letter sent by EPA (**Attachment 1**) is unreadable, and the date received was not provided by the facility. The purpose of the inspection was to observe the program's compliance with the Clean Water Act (CWA) and the applicable Federal Pretreatment Regulations. The Delaware Department of Natural Resources and Environmental Control (DNREC) was invited, Nicole Smith, DNREC Program Manager I, Resource Protection Section, was present for the inspection.

A. Inspection Opening Conference

The EPA Inspector arrived at the facility at approximately 11:00 AM for the on-site inspection. Inspector Thomson met with the following facility representatives:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Aaron Thomson	EPA - Philadelphia	215-814-2116	Thomson.aaron@epa.gov
Site/Facility Representatives			
Julie Turpening	Clarios – Site EHS Manager	302-437-4538	julie.turpening@clarios.com
Kelly Wright	Clarios	(302) 354-5761	Kelly.M.Wright@clarios.com
Petya Georgieva	Clarios – Regional EHS Manager	(629)267-8698	petya.georgieva@clarios.com
DNREC Representative			
Nicole Smith	DNREC	302-739-9946	nicole.smith@delaware.gov

Inspector Thomson displayed his credentials to Ms. Turpening, Ms. Wright and Ms. Georgieva at the outset of the inspection, and explained the purpose of the inspection was to observe compliance with the Federal Pretreatment Regulations. The EPA Inspector informed Ms. Turpening that any information that the Facility deemed to be confidential business information ("CBI") should be identified to EPA representatives during the inspection and it would be handled as CBI according to EPA's CBI procedures.

B. Weather and Precipitation Conditions

During the inspection, the weather was sunny with a high of 86 degrees Fahrenheit.

II. Facility Activity/Walkthrough

The facility is classified as a "Battery Manufacturing" Categorical Industrial User (CIU), which is subject to the Federal Pretreatment Regulations 40 CFR Part 403 and Categorical Industrial User Regulations 40 CFR Part 461.35. The facility discharges to the Town of Middletown sewage system, leading to the Town of Middletown

publicly owned treatment works (POTW). Because the facility discharges into a POTW without an approved pretreatment program, EPA is designated as the Control Authority, and as such is the authority for inspections per 40 CFR Part 403.3(f).

The facility is a battery manufacturing/distribution plant that fills, forms, washes, decorates, and distributes automotive lead-acid storage batters. According to Ms. Georgieva, The facility employs 347 employees over 3 different 8-hour shifts and 4 different 12-hour shifts, operating 24 hours a day with 2-10 operational engineers monitoring systems including the pretreatment system.

According to documents provided by the facility detailing their wastewater operations (**Attachment 3**), wastewater directed to the wastewater treatment process will primarily be generated from the formation processes (acid mixing, initial and final fill, and the water baths), battery washers, battery rinses, water bath cooling and conditioning system blowdown and floor/general cleaning. Any spillage in secondary containment areas at initial and final fill, water bath tables, acid mixing, concentrated acid storage, bulk caustic storage and neutralization/washing/rinse stations on the decorating line may also be pumped to the wastewater treatment process. See below for a current flow schematic of processes feeding into the wastewater treatment process:

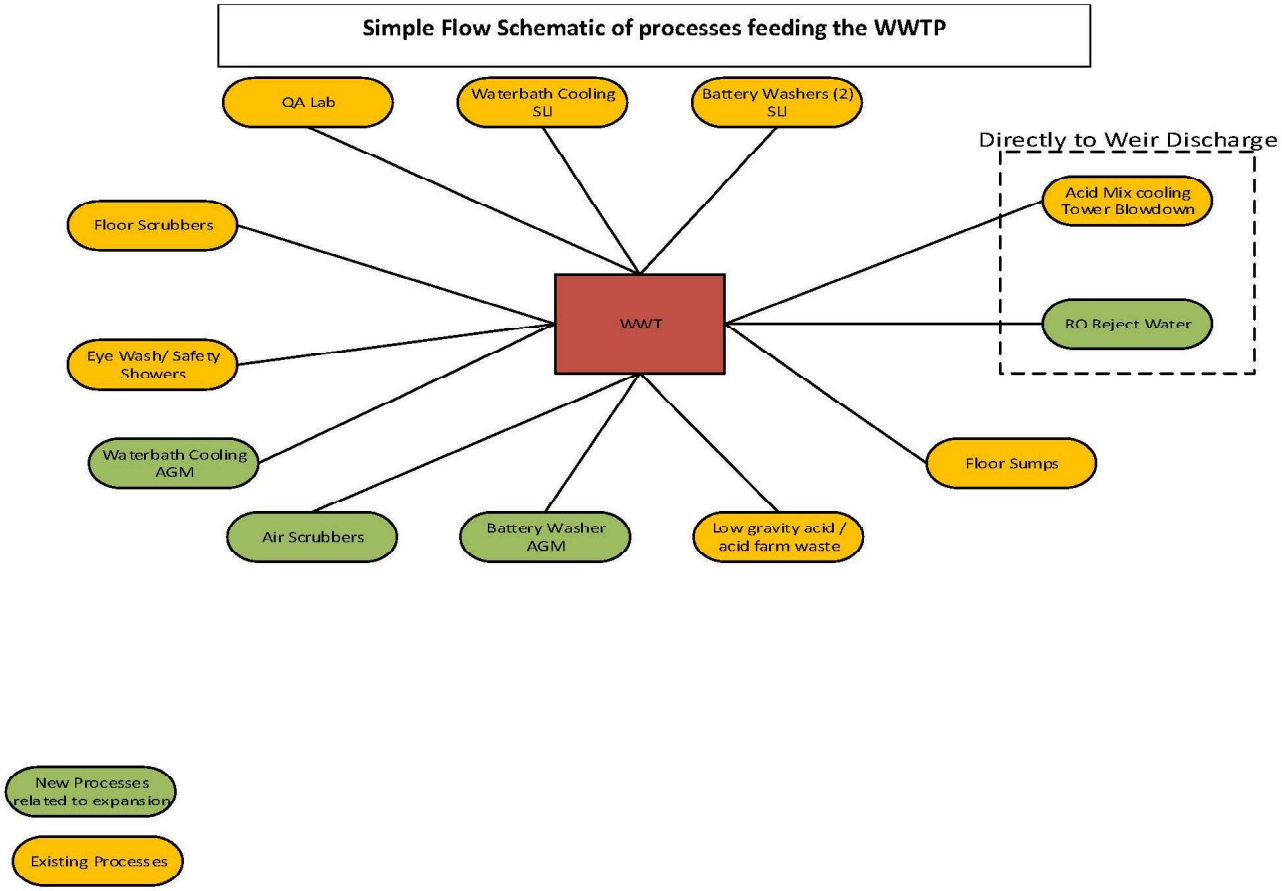

Figure 1: Wastewater Contribution Flowchart

According to documentation provided by the facility (**Attachment** 3), the wastewater treatment process consists of five equalization tanks (T-1 to T-5), a neutralization tank (T-6), reactor tank (T-7), flash mix tank (T-8), flocculation tank (T-9), clarifier (C-1), sludge tank (T-10), filter transfer tank (T-11), tertiary polishing filter (TPF-1), filter press (FP-1), final effluent monitoring tank (T-12) and anionic polymer day tank (T-13).

Wastewater from process operations is collected in Equalization Tank T-1 or T-2. T-1 is a 11,941- gallon, flat-bottom, open-top fiberglass tank equipped with mixer baffles, mixer rail, variable speed electric mixer, high level float switch, ultrasonic level sensor and transmitter, pneumatic control valve, 4-inch flanged overflow, 4-inch flanged equalizer, 3-inch flanged discharge, 2-inch flanged drain, duplex variable speed centrifugal pumps equipped with a basket strainer, pneumatic control valves, pH adjustment loop that includes an in-line pH sensor and a pH analyzer/controller, magnetic flow meter, manual bypass and pneumatically actuated positioning valve.

Treatment consists of the addition of sodium hydroxide as needed to increase the pH. When sufficient volume has accumulated in Tank T-1, the pH is above the caustic target setpoint and a pumpdown cycle is not already active for Equalization Tank T-2, wastewater is transferred to the Neutralization Tank (T-6) for further treatment when a pumpdown cycle is initiated by the PAC or operator. Equalization Tank T-1 overflows into Equalization Tank T-2 when the level in the tank is greater than the invert elevation of the 4-inch overflow. Similarly, overflow from T-2 will be directed to T-3, from T3 to T-4 and from T-4 to T-5. Tanks 1 through 5 have similar dimensions, specifications and monitoring equipment and addition of sodium hydroxide to increase the pH occurs in each equalization tank.

Neutralization Tank T-6 is a 2,862 gallon, flat-bottom, open-top fiberglass tank equipped with an air mixer, mixer rail, variable speed electric mixer, pH sensor and pH analyzer/controller, 6-inch flanged overflow and 2-inch flanged drain. Treatment consists of the addition of sodium hydroxide or sulfuric acid as needed to adjust pH. From Neutralization Tank T-6, the pH adjusted wastewater flows by gravity through a 6-inch overflow into Reactor Tank T-7.

Reactor Tank T-7 is a 2,862 gallon, flat-bottom, open-top fiberglass tank equipped with an air mixer, mixer rail, variable speed electric mixer, pH sensor and pH analyzer/controller, 6-inch flanged inlet, 6-inch flanged overflow and 2-inch flanged drain. Treatment consists of the addition of ferric chloride, sodium hydroxide and cationic polymer (when required). From Reactor Tank T-7, the chemically conditioned wastewater flows by gravity into Flash Mix Tank T-8, via the 6-inch overflow.

Chemically conditioned wastewater flows into the Flash Mix Tank T-8 that is equipped with a variable speed electric mixer, mixer mounting bracket, 6-inch flanged inlet, underflow baffle, overflow baffle and 2-inch flanged drain. Treatment consists of the addition of anionic polymer as a flocculating aid, and rapid mixing. From Flash Mix Tank T-8 chemically conditioned wastewater flows by gravity into Flocculation Tank T-9 that is equipped with a variable speed electric mixer, mixer mounting bracket, 6-inch flanged outlet, underflow baffle, overflow baffle and 2-inch flanged drain. Treatment consists of slow mixing to allow for flocculation of precipitated metals to occur prior to clarification.

From Flocculation Tank T-9 chemically conditioned wastewater flows by gravity through a 6-inch overflow into Clarifier C-1, which is an incline plate clarifier with a projected surface area of 330 square feet, design flow of 60 gpm and a maximum surface overflow rate of 0.18 gpm per square foot. Clarifier C-1 is equipped with a 6-inch flanged inlet, 6-inch flanged outlet, 4-inch flanged sludge outlet, sludge chamber with sludge auger and an air operated diaphragm (AOD) pump. Clarified effluent is discharged by gravity, via the 6-inch overflow, into the Filter Transfer Tank T-11. Settled solids are pumped from the bottom of the Clarifier C-1 through the 4-inch sludge outlet to Sludge Tank T-10 or Reactor Tank T-7 for seeding.

Filter Transfer Tank T-11 is a 1,500-gallon flat-bottom, dome-top, polyethylene tank equipped with low level float switch, high level float switch, ultrasonic level sensor and transmitter, 4-inch overflow, 3-inch discharge and duplex variable speed centrifugal pumps equipped with pneumatic control valves. The 4-inch overflow from Tank T-11 is directed to Final Effluent Monitoring Tank T-12. When sufficient volume has accumulated in Filter Transfer Tank T-11, the treated effluent is automatically transferred to Tertiary Polishing Filter TPF-1 for filtration.

The treated effluent transferred from Filter Transfer Tank T-11 will be filtered through one of three (3) multi-media filter vessels of triple cell Tertiary Polishing Filter TPF-1, prior to discharge to Final Effluent Monitoring Tank T-12. Each fiberglass filter vessel is 36-inch diameter by approximately 84-inch overall height and is

equipped with pneumatic control valves, magnetic flow meter (backwash), pressure transmitters and multimedia filter bed consisting of gravels, sands, garnet and anthracite. The treated effluent is filtered down to 10 to 15 microns before it is discharged to Final Effluent Monitoring Tank T-12. Backwash from the Tertiary Polishing Filter TPF-1 is directed into either Equalization Tank T-1 or T-2, via manual valves set by the operator. A backwash cycle is initiated manually by the operator, or automatically by the PAC based on time or differential pressure. The Final Effluent Monitoring Tank T-12 is a rectangular welded polypropylene tank equipped with a 22.5 degree v-notch weir, 6-inch flanged outlet, 2-inch drain, bubbler flow meter, automatic sampler and a pH sensor and pH analyzer/controller. Prior to being discharged to the hub drain connected to the Town of Middletown sanitary sewer system, the final effluent is monitored for pH, temperature and flow and sampled (as required).

Sludge Tank T-10 is a 3,010-gallon skirted, conical bottom, open-top, and fiberglass tank equipped with ultrasonic level sensor and transmitter, 3-inch flanged outlet, three (3) 2-inch flanged decant ports, fiberglass tank access platform and an AOD pump with an electropneumatic regulator and pulsation dampener. Sludge from Tank T-10 is pumped to a plate and frame filter press, Filter Press FP-1, for dewatering.

Filter Press FP-1, is a 12-ft3 gasketed plate and frame filter press equipped with splash curtain, semi-automatic plate shifter, drum chute and fiberglass access platform. Suspended solids are filtered through the press producing a dry cake ready for proper recycling. Filtrate is discharged to Filter Transfer Tank T-11 during a press run, and blowdown drains via the floor trench drain to Sump S-1 and is pumped to Equalization Tank T-1 for reprocessing through the WPS.

Anionic Polymer Day Tank T-13 is a100-gallon, open-top, polyethylene tank equipped with cover, mixer stand, electric mixer, chemical feed pump and city water make-up. Anionic polymer solution is mixed manually and stored in the 100-gallon tank. Anionic Polymer Feed Pump CF-13 feeds anionic polymer solution to Flash Mix Tank T-8.

Overflow from Equalization Tank T-4, Sludge Tank T-10, Filter Press FP-1 blowdown, floor wash down and occasional leaks and spills are directed to the floor trench drain that drains to Sump S-1. Sump S-1 is equipped with high level float switch, pump on level float switch, pump off level float switch, AOD pump with pulsation dampener and basket strainer. The discharge from Sump S-1 is directed to Equalization Tank T-1.

The wastewater treatment process is controlled by an Allen-Bradley Programmable Automation Controller (PAC) located in the PAC Control Panel. A PanelView touch screen operator interface (PanelView) provides for system monitoring and automatic and manual control of process pumps, mixers and chemical feed pumps.

See **Attachment 3, Section 7** for detailed schematics of the facility's processes.

After the opening conference, the facility's staff led a tour of their pre-treatment process. First, Inspector Thomson was led to the facility's battery production line (**Attachment 2 Photograph 1**), equipped with troughs to collect any spillage (**Attachment 2 Photograph 2)**. Next, Inspector Thomson was led to the pretreatment process line, visiting the equalization tanks (**Attachment 2 Photograph 3**), filter transfer tank t-11 (**Attachment 2 Photograph 4**), and tertiary polishing filter (**Attachment 2 Photograph 5**). The Inspector observed the final effluent monitoring station and composite sampler (**Attachment 2 Photographs 6 and 7**). Inspector Thomson was then led to the facility's neutralization tank (**Attachment 2 Photograph 8**) clarifier (**Attachment 2 Photograph 9**), the flocculation tank (**Attachment 2 Photograph 10**) and the flash mix tank

(**Attachment 2 Photograph 11**). Inspector Thomson then returned to the final effluent monitoring station (**Attachment 2 Photograph 12**), observing the ISCO GLS Sampler (**Attachment 2 Photograph 13**), the ISCO 4210 flow meter (**Attachment 2 Photograph 14**) and pH probe monitor (**Attachment 2 Photograph 15**). Finally, the Inspector was led to the pH buffer solutions (**Attachment 2 Photograph 16**) used to calibrate the pH meter, stored close to the final effluent monitoring station, and all were found to not be expired. This concluded the site tour.

III. Observations

A checklist was utilized during the review and is provided below. The checklist is divided into sections, with Observations listed under each section. Photographs were taken during the inspection by Inspector Aaron Thomson, and are provided in **Attachment 2.** Not all photographs taken during the inspection are included in this report.

Visual Observations pertaining to each section are listed at the end of each section.

Section 1.				
General Information				
	Yes	**No**	**N/A**	**Comments**
General Description of Processes and Products	Battery Production - General pretreatment of process water via chemical balancing.			
Are there any alternates to effluent monitoring conducted? (e.g., TTO/TOMP, Waiver requirements?) Describe in comments if "yes"	☐	☐	☒	
Provide production rates for all processes subject to production based standards and include:	"-WWT Design Flow: 0.0864 MGD -WWT Avg Daily Flow: 0.0252 MGD -Production Avg Daily Rate (Aug 21-Jul 22): 25,767 Batteries/Day -Production (Aug 21-Jul 22): 309,204 Batteries"			
1) Process				
2) production rate used for calculating limits				
3) production rate for last 12 months				
Any anticipated changes in processes or production rates?	☐	☒	☐	
List the production rate listed on the approval letter	NA			
Shift information, list	Continuous Operation (3-2 schedule): # Employees: 347 Shifts: 1,2,3 (8-hr shifts); A-D (12-hr shifts)			
1) Shift #				
2) No. of Employees				
3) Hours				
4) Work Days				
Is production seasonal? If yes, describe	☐	☒	☐	24/7 operation, but do experience peak and low times seasonally
List all visual observations pertaining to this section				

Section 2.
Categorical Industry

	Yes	No	N/A	Comments
Categorical Industry?	☒	☐	☐	
Category(s):	40 CFR Part 461.35,			
Subcategory(s):	Battery Manufacturing			
Regulatory New Source Date:	2011			
New source?	☐	☒	☐	
List of categorical processes	Open Formation - WET			
List of other operations producing wastewater	See **figure 1**			
List all visual observations pertaining to this section				

Section 3.				
Characterization of Wastewater Discharges (CFR ##.##.##)				
	Yes	**No**	**N/A**	**Comments**
Describe the time of day discharge to sewer occurs	Continuously, predominantly 6 am- 2pm			
Are discharges seasonal (if yes, describe)	☐	☒	☐	
Attach a block flow diagram of manufacturing process in the Facility Activity section of the inspection report, including: chemical storage area, and wastewater generated. Identify all regulated, unregulated and dillution wastewater discharges. Include sample location, discharge flow rates and method of disposal*. Note any recent changes. *disposal method CD - Continuous discharge to sanitary ND - Not discharged or disposed BD - Batch discharge to sanitary sewer HH - Hauled as hazardous waste OD - Other disposal - not to sanitary sewer HW - Hauled as nonhazardous waste				
List all visual observations pertaining to this section				

Section 4.				
Pretreatment Facility				
	Yes	**No**	**N/A**	**Comments**
Pretreatment installed?	☒	☐	☐	
Attach a schematic of the pretreatment facility in the Facility Activity section of the inspection report (include all units and sludge storage)				
Briefly describe treatment processes and operation.	pH balancing and flocculation			
Describe sludge storage and disposal method	On-site storage in lined drums. Sent out as hazmat (scrap) to smelter.			
Describe appearance of effluent at time of inspection.				
List all visual observations pertaining to this section				

Section 5.				
Self Monitoring				
	Yes	**No**	**N/A**	**Comments**
Does facility have a sampling plan or protocol including use of 40 C.F.R. Part 136 techniques (obtain copy)?	☒	☐	☐	Mr. Georgivia stated they had a sampling plan (not provided), and sampling bottles prepared by Eurofins
Is sampling location (identified on block flow diagram) the same as in control mechanism? If no, explain.	☐	☐	☒	Sampling location not specified in control mechanism provided (**Attachment 1**)
Is this sampling location permanently identified by a sign, painted number, or other means?	☒	☐	☐	**Attachment 2 Photograph 6**
Is this sampling location appropriate? If no, explain…	☒	☐	☐	
Is this sampling location shown on the chain of custody form?	☒	☐	☐	Chain of Custody (CoC) is in lab reports (**Attachment 5-7**)
Are any parameters monitored by approved methods more frequently than required at permitted sampling location?.	☒	☐	☐	
If yes to previous question, are all results submitted to the control authority?	☒	☐	☐	**Atachments 4-7 show data submission to EPA**
Does facility resample and report within 30 days of discovering a violation?	☒	☐	☐	
Are sampling records maintained on site? Describe for how long.	☒	☐	☐	Since 2015
Is flow determined as required by permit?	☒	☐	☐	
How is flow determined (i.e., estimated or measured)?	Measured continuously (meter)			
Is flow measurement appropriate?	☒	☐	☐	
Is flow measurement device calibrated?	☒	☐	☐	Annual – Flow Controls
Does the facility have an operator's manual for its pH meters?	☒	☐	☐	
Does the facility do a proper 2-point calibration of its pH meter in accordance with the operator's manual?	☒	☐	☐	
Is other monitoring equipment (e.g. DO meter) calibrated? Describe how often if yes.	☒	☐	☐	pH meters, at least weekly
Is sampling and analysis done in-house or by contract? If by contract, list company.	☐	☐	☐	Contract, Eurofins Environmental testing Philadelphia, LLC
Is QA/QC program for sampling and analysis adequate? Obtain copy of plan if available.	☐	☐	☒	Eurofins
List all visual observations pertaining to this section				

Section 6.				
Hazardous Waste Management				
	Yes	**No**	**N/A**	**Comments**
Is IU aware of RCRA regulations?	☒	☐	☐	
Does facility generate any hazardous waste? If yes, indicate type of waste, method of management on site and means of disposal on a separate sheet. Describe any spillage problems or any other releases that are observed.	☒	☐	☐	"-Lead-contaminated post polishers; lead-contaminated gloves -Stored <180 days on-site; moved and treated via TSDF"
Has facility notified POTW and EPA of any hazardous waste discharges to the sewer?	☐	☐	☒	
List all visual observations pertaining to this section				

Section 7.				
Spill Prevention				
	Yes	**No**	**N/A**	**Comments**
Has the facility had any spills or been responsible for slug loads? List dates of events in comments.	☒	☐	☐	7/23 Fire (Fire water slug)
If yes to previous question, was POTW notified?	☒	☐	☐	
Does the facility have spill notification procedures posted?	☒	☐	☐	
Has the facility evaluated its need for a spill prevention plan at least every two years?	☒	☐	☐	
If yes to previous question, was it determined that they needed one?	☒	☐	☐	**Attachment 8**
Does the IU have a spill prevention (SP) plan to address spills to the POTW?	☒	☐	☐	
If spills occurred- Did the IU follow procedures outlined in the spill plan at the time of spills?	☒	☐	☐	
If spills occurred- Were procedures effective in containing the spill?	☒	☐	☐	
Is the facility keeping records of spill events?	☒	☐	☐	
Have there been any changes in spill procedures recently. Describe if yes.	☐	☒	☐	
List all visual observations pertaining to this section				

Section 8.				
Recordkeeping Review.				
	Yes	**No**	**N/A**	**Comments**
Current IU control mechanism (through EPA, not a permit)	**Attachment 1**			
Notices and correspondence with control authority including:				

a. Self monitoring report transmittals?	☒	☐	☐	
b. BMR if required?	☐	☐	☒	
c. Other?	☐	☐	☒	
Do sampling records include:				
a. Date of sampling event?	☒	☐	☐	CoC is in lab reports (**Attachment 5-7)**
b. Time of sampling event?	☒	☐	☐	CoC **5-7**
c. Name of sampling person and affiliation?	☒	☐	☐	CoC **5-7**
d. Sample collection method?	☒	☐	☐	CoC **5-7**
e. Method of sample preservation?	☒	☐	☐	CoC **5-7**
f. Description of sample location?	☒	☐	☐	CoC **5-7**
g. Name of person conduction analysis?	☒	☐	☐	CoC **5-7**
h. Date of analysis?	☒	☐	☐	CoC **5-7**
i. Time of analysis, if applicable (i.e., BOD, Cr?)	☒	☐	☐	CoC **5-7**
j. Sample analyses method?	☒	☐	☐	CoC shows requested method, analysis results (**Attachment 5-7**) show method used
Is type of sample specified in control mechanism?	☒	☐	☐	CoC 5-7
Are all parameters monitored at the required frequency? Note any discrepancies in comments.	☒	☐	☐	
Analytical results?	☒	☐	☐	Lab reports provided (**Attachment 5-7**)
Are all monitoring results sent to the Control Authority?	☒	☐	☐	
Are copies sent to the POTW?	☒	☐	☐	Ms. Georgieva stated that they do, shows "CC to middletown.." on **Attachments 4-7**
Appropriate production records for production based standards?	☐	☐	☒	
Documentation of flow rates and volumes?	☒	☐	☐	
Are records maintained at least 3 years?	☒	☐	☐	
List all visual observations pertaining to this section				

Section 9.				
EPA Sampling				
	Yes	**No**	**N/A**	**Comments**
Were samples taken?	☐	☒	☐	
Describe sampling location, method, and time:				
List all visual observations pertaining to this section				

Section 10.

Stormwater				
	Yes	**No**	**N/A**	**Comments**
Does facility have a stormwater permit?	☐	☒	☐	
If yes, describe what type of permit along with issuance and expiration dates	No exposure certification in place			
Does facility have a stormwater pollution prevention plan?	☒	☐	☐	
Describe any BMPs that the facility is currently implementing.	Ms. Georgieva said included in SPCC plan, periodic SW inspections as needed, bulk chemical unload is under cover			
List all visual observations pertaining to this section				

Section 11.				
Current Compliance Status				
	Yes	**No**	**N/A**	**Comments**
Indicate compliance with:				
a. effluent limits (indicate in comments the date range reviewed)	☒	☐	☐	
b. monitoring (indicate in comments the date range reviewed)	☒	☐	☐	
c. recordkeeping/reporting (indicate in comments the date range and records reviewed)	☒	☐	☐	
List all visual observations pertaining to this section				

IV. Records Review

As part of the inspection, Inspector Thomson requested the following documentation be sent via email up to two weeks after the inspection: Control mechanism, categorical status, 2 years-worth of monitoring reports, slug/spill prevention plan and process flow diagrams relating to the pretreatment system. Ms. Wright sent requested documents via email on September 30, 2022.

V. Closing Conference

After the facility inspection, the EPA Inspector met with the facility representatives for a closing conference. The EPA Inspector shared preliminary observations with the facility. The EPA Inspector 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 1:30 PM

VI. List of Attachments

Attachment 1. MDC waste water treatment permit
Attachment 2. Photo Log

Attachment 3. 11-374-10 JCPS MDC Wastewater Pretreatment System OM Manual
Attachment 4. 2020-1-21 MDC WW Report to EPA - Email Submittal
Attachment 5. 2022-1-30 Report Submission MDC
Attachment 6. 2021-7-27 MDC WWT Report Submission (Jan-Jun)
Attachment 7. 2022-7-28 Report Submission MDC
Attachment 8. ERP Appendix - Slug Discharge Plan