UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION 2
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION
MULITMEDIA PERMITS AND COMPLAINCE BRANCH

NPDES Stormwater Reconnaissance Inspection
Industrial Site

Owner/Operator

TROPICAL SHIPPING CONSTRUCTION COMPANY LIMITED, LLC
P.O. Box 3003, Kingshill, St. Croix, USVI 00851
William D. Roebuck Industrial Park, Building 1, Suite 104
Frederiksted, St. Croix, USVI 00840
Web Page: www.tropical.com

Facility

TROPICAL'S CONTAINER PORT MARINE CARGO TERMINAL
No. 8 Estate Hope, Christiansted, St. Croix, USVI 00840
Latitude: 17° 41´46.79″ N; Longitude: 64° 45´17.57″ W
Telephone Number: 340-778-8767

Sections 301(a), 308(a) and 402 of the Clean Water Act
NPDES Regulations: 40 C.F.R. § 122

TPDES Tracking Number: VIU009881(ICIS)

Receiving Water: Limetree Bay (Caribbean Sea)

Inspection Date: March 29, 2023

Participating Personnel:

U.S. EPA:	Jim C. Casey, Senior Environmental Engineer Clean Water Act Team
DPNR:	Antonio Farchette, Environmental Specialist Water Pollution Control Program Tel.: (340) 718-9749 Email: Antonio.Farchette@dpnr.vi.gov
TROPICAL:	Karla Yhan, St. Croix Island Manager Tels.: (340) 778-8767; (340) 690-1236 Email: kyhan@tropical.com

Inspection Report Prepared by:

JIM CASEY

Digitally signed by JIM CASEY
Date: 2023.05.30 17:23:22 -04'00'

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Jim C. Casey — Date
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Inspection Report Approving Officer:

Rivera, Jose

Digitally signed by Rivera, Jose
Date: 2023.05.31 12:37:10 -04'00'

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José A. Rivera, BSCE — Date
Lead Environmental Engineer
Clean Water Act Team
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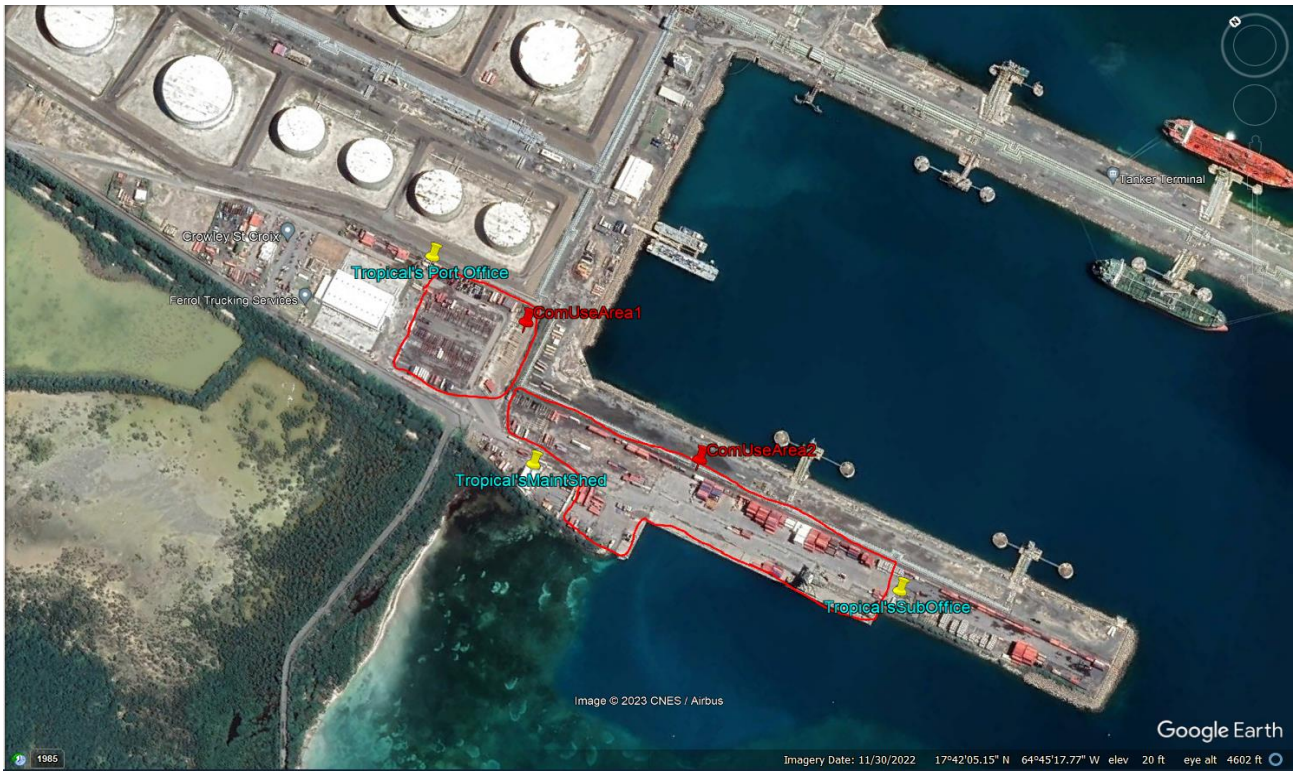
1. BACKGROUND

The Container Port Seaport ("Container Port") consists of the entire left section of the dock bulkhead under the ownership of the Virgin Islands Port Authority ("VIPA"). Entities engaged in commercial marine cargo shipping and management activities use the dock space through tenant occupancy and common-use agreements entered with VIPA. Records revealed that the Container Port is situated on land parcel No. 8 Estate Hope, Christiansted, St. Croix, United States Virgin Islands ("USVI").

Tropical Shipping Construction Company Limited, LLC[1,2] ("Tropical") through a tenant occupancy agreement conducts maritime shipping operations involving loading and unloading of commercial cargo containers with goods and other bulk items at the Container Port. The dock spaces under the specific operational control of Tropical comprises the area of focus (the "Facility") for purpose of this inspection. An aerial photograph of the Facility[3] is featured as **Figure 1** of this Inspection Report.

Figure 1
Tropical's Container Port Marine Cargo Terminal,
Christiansted, St. Croix, VI



On March 29, 2023, Jim C. Casey ("EPA Inspector") of the United States Environmental

[1]The assigned TPDES tracking number remains a valid reference for compliance monitoring activities related to the Tropical Shipping Construction Company Limited, LLC's Facility ("Tropical") at the above referenced address.
[2]Tropical is a USVI-based subsidiary of Tropical Shipping Corporation based out of Rivera Beach, FL. Tropical features port operations in the islands of St. Thomas and St. Croix, respectively.
[3] For this NPDES Stormwater Reconnaissance Inspection, the Facility comprises the marked areas and part of ComUseArea 1 at Container Port Seaport, St. Croix, USVI (Google Earth Pro Imagery, dated November 30, 2022).

Protection Agency (“EPA” or “Agency”) and Mr. Antonio Farchette of the Virgin Islands Department of Planning and Natural Resources (the “DPNR Inspector”; and together “the Inspectors”) performed a Federal-lead, joint-agency National Pollutant Discharge Elimination System (“NPDES”) Stormwater Reconnaissance Inspection (“RI” or the “2023 Inspection”) at the Facility. The purpose of the 2023 Inspection was to determine whether the industrial activities conducted by Tropical at the Facility and resulting discharges of process waste streams and storm water associated with those activities are subject to the regulations implementing the Clean Water Act (“CWA” or “Act”), as amended. The 2023 Inspection was performed pursuant to the inspection authority under Section 308(a) of the CWA.

The focus of the 2023 Inspection included among others:

a. Evaluation of existing industrial operations being conducted within the Facility at the time of the 2023 Inspection.

b. Evaluation of operations and practices conducted at the Facility which may potentially result in generated industrial process waste streams, associated treatment, and discharge of those waste streams into Lime Tree Bay (Caribbean Sea).

c. Evaluation of stormwater runoff flow pattern within the Facility, and associated with industrial activities being conducted on-site, the management of and discharge of such discharges out of the Facility into an area stormwater drainage system or into nearby waterbodies.

d. Evaluation of any Best Management Practices (“BMPs”) in place associated with proper management and prevention of pollutants being discharged from the Facility into Lime Tree Bay.

e. Review of any records associated with industrial operations and management of discharge of pollutants from the Facility into Lime Tree Bay.

This Inspection Report (the “2023 Inspection Report”) entails discussion of observations and findings, comments, and description of areas of concern regarding the conditions that existed at the Facility at the time of the RI. Also included in this 2023 Inspection Report are the EPA Inspector’s evaluation of BMPs instituted by Tropical for control and prevention of discharges of pollutants through storm water associated with industrial activity conducted at the Facility and flows into Lime Tree Bay.

2. GENERAL INFORMATION ABOUT THE RI ACTIVITIES

The dates and times during which activities of the 2023 Inspection were conducted, and related weather conditions are summarized in **Table 1** (on the next page).

3. GENERAL INFORMATION ABOUT FACILITY AND BUSINESS OPERATIONS

The industrial activities that are conducted by Tropical at its Container Port Marine Cargo Terminal are characterized as the company's "primary industrial zone" in the District of St. Croix, which include:

Table 1

Dates of Facility Visits	Inspection Activity	Time Started & Ended	Weather Condition
3-29-2023	**Entrance Interview On-Site – Upon entry, the EPA Inspector met with Mr. Lauriel Francis, Warehouse/Equipment Control Supervisor, and asked to speak with Ms. Karla Yhan, St. Croix Port Island Manager. Ms. Yhan was not immediately on-site and was contacted on the telephone. She arrived on-site. The EPA Inspector stated the purpose of the Inspection and presented his EPA Inspector's Credentials.**	**9:45 am** **10:10 am**	**Dry, clear skies, sunny, (mid-morning)**
	End of Entrance Interview.	**10:30 am**	
	The EPA Inspector requested access to the Facility's records associated with activities that are conducted on-site. The EPA Inspector requested a copy of the most recent representative stormwater drainage drawing for the Facility to facilitate the walkthrough. The records and drawing of stormwater drainage were also not readily available. **The Inspector began the walkthrough in the vicinity of the container staging area situated immediately on the right-side of the road upon entry into the Container Port compound.**		
	End of walkthrough, and left Facility.	**12:20 pm**	
	Convened Exit Meeting at Tropical's St. Croix administrative office located at the St. Croix Industrial Complex.	**12:35 pm**	
	Ended Exit Meeting. The EPA Inspector left Tropical's St. Croix administrative office.	**1:00 pm**	
	Exited Facility.	**1:10 pm**	

a. one central area under common use by the tenants for loading and unloading of commercial cargo containers and bulk items for different grades of freight transport ships;

b. separate areas where both, inbound and outbound cargo containers and related accessories for transportation of the containers over land are staged, stored and managed;

c. associated support activities, including a maintenance shed for servicing vehicles and equipment, a fueling terminal; and

d. administrative trailer offices.

The business operations of the Facility are best described by the primary Standard Industrial Classification ("SIC") Code 4491 (Marine Cargo Handling)[4].

4. GENERAL INFORMATION ABOUT TROPICAL

Tropical is a corporation authorized to do business in the USVI. The relevant principals of the corporation identified at the time of the 2023 Inspection were Mr. Dean Beitler, Assistance Vice President of Human Resources and Ms. Karla Yhan, Island Manager for St. Croix, Cargo Operations of Tropical, and whose corporate office is located at the address referenced in Section 1 above.

5. APPLICABLE REGULATIONS AND PERMITS

Discharges of Industrial Waste Streams into Waters of the United States

Section 301(a) of the CWA, 33 U.S.C. § 1311(a), provides in part that "[e]xcept as in compliance with [CWA § 402], the discharge of any pollutant by any person shall be unlawful." Pursuant to the NPDES regulation at 40 C.F.R. § 122.1(b), a NPDES permit is required for the discharge of any pollutant from any point source into waters of the United States. Section 402(a)(1) of the Act, 33 U.S.C. § 1342(a)(1), provides that "the Administrator may, after opportunity for public hearing, issue a permit for the discharge of any pollutant…. upon condition that such discharge will meet…. such requirements as the Administrator determines are necessary to carry out the provisions of the [CWA]."

The USVI statute at 12 V.I.C. § 185(a), states in part, that except as provided in this chapter and any rule and regulations promulgated hereto, the discharge of pollutants into waters of the USVI by any person, shall be unlawful.

Discharges of Storm Water Associated with Industrial Activity into Waters of the United States

Section 402(p)(2)(B) of the CWA authorizes the Administrator of EPA to issue NPDES permits to storm water discharges associated with industrial activity. EPA promulgated NPDES regulations defining the term storm water associated with industrial activity. Those regulations are codified in 40 C.F.R. § 122.26(b). The industrial activity classified under SIC Codes 4491 (Marine Cargo Handling) and 4424 (Deep Sea Domestic Transportation of Freight) are included in the definition of storm water discharges

[4]Refer to Sector Q: Water Transportation Facilities with Vehicle Maintenance Shops and/or Equipment Cleaning Operations, in the MSGP.

associated with industrial activity. See 40 C.F.R. § 122.26(b)(14)(viii).

On June 20, 2007, DPNR promulgated regulations pursuant to USVI Statute at 12 V.I.C. Chapter 7, Subchapter 184-45, which require owners/operators of facilities with storm water discharges associated with industrial activities to apply for and obtain coverage under a TPDES permit.

Pursuant to Section 301(a) and 402(p) of the CWA, 33 U.S.C. §§ 1311(a) and 1342(p), and 40 C.F.R. §§ 122.21 and 122.26(e), and USVI's Statute at 12 V.I.C. Chapter 7, Subchapter 184-45, if evidence reveals **that Tropical's stormwater discharges associated with industrial activity from its Facility meet the industrial classifications of a Marine Cargo Handling and/or a Deep Sea Domestic Transportation of Freight industry, then Tropical is required to apply for and obtain TPDES permit coverage.**

TPDES Permitting

DPNR issued the Territorial Pollutant Discharge Elimination System ("TPDES"") Multi-Sector General Permit for Storm Water Discharges from Industrial Activity ("2012 MSGP") pursuant to Subsection 184-46(a)(2)(i) of the TPDES regulations. The 2012 MSGP became effective on January 1, 2012 and expired on December 31, 2016. Since then, the MSGP was reissued on March 1, 2017 ("2017 MSGP" or the "Permit"), which expired on February 28, 2022.

6. GENERAL INFORMATION ABOUT THE RECEIVING WATERS

The Facility is situated along the southcentral shoreline of St. Croix's Lime Tree Bay (Caribbean Sea). An aerial view of location of the Facility and immediate surroundings are depicted in satellite imagery in **Figure 2** (Source: https://nepassisttool.epa.gov/nepassist/nepamap.aspx), on the next page.

7. PRE – 2023 INSPECTION FILES REVIEW

On March 21, 2023, the EPA Inspector conducted review of documents in the case file for Tropical maintained at EPA's office in the USVI and searched EPA's Integrated Compliance Information System ("ICIS") and the Enforcement and Compliance History Online ("ECHO") databases to determine the TPDES permitting status, and recent compliance history, respectively.

The records review revealed the following, among others, that:

a. EPA issued Request for Information ("RFI") letters to Tropical on March 23, 2021 and June 17, 2021[5], respectively, seeking information to evaluate and determine whether

[5] The EPA issued RFIs covered both Tropical's Crown Bay Marine Cargo (CEPD-CWA-02-IR-2021-002) and Container Port Marine Cargo (CEPD-CWA-02-IR-2021-003) Facilities.

the Facility may be subject to requirements of the regulations implementing the CWA and the WPCA.

Figure 2
Tropical's Facility situated within the watershed that along the south-central coastline (Lime Tree Bay) of St. Croix

b. Through its technical consultant, Tropical performed ~~a due diligence investigation~~ an assessment of the stormwater management infrastructure at the Facility on October 14, 2021, which revealed the potentially for discharges of stormwater associated with industrial activity from its Facility into Lime Tree Bay.

c. Tropical is not permitted to discharge pollutants through the discharge of storm water associated with industrial activities from its Container Port Marine Cargo Terminal into Lime Tree Bay.

d. A formal NPDES compliance Inspection at the Facility had not been performed by DPNR or EPA prior to this 2023 Inspection.

e. Through a March 24, 2023 email correspondence, EPA issued an advisement to Tropical regarding the Agency's planned Stormwater Reconnaissance Inspection at Tropical's Container Port Marine Cargo Terminal for March 29, 2023, and requested that the company make available relevant records associated with management process wastewater and stormwater, and to secure the arrangements to facilitate and accommodate the site visit. The EPA March 24, 2023 email correspondence is featured in **ATTACHMENT 2** of the 2023 Inspection Report.

8. ENTRY, REVIEW OF RECORDS, AND WALKTHROUGH IN THE FACILITY

a. Entry into the Facility

On March 29, 2023, the Inspectors entered the Facility at approximately 9:45 a.m. but was advised that Ms. Karla Yhan, Port Island Manager for St. Croix was not readily available on-site. The EPA Inspector reached Ms. Yhan by telephone and advised her of the Agency's arrangement with Tropical's corporate office to initially convene at location of the Container Port Marine Cargo Terminal.

Ms. Yhan arrived at Container Port Marine Cargo Terminal at about 10:15 a.m.

The EPA Inspector met with Ms. Yhan in front of Tropical's administrative trailer office at the Facility and established the purpose for his presence on-site and presented his Inspector's Credentials issued by the Agency. Ms. Yhan provided a general description of the typical daily industrial operations that are conducted at their Facility. The EPA Inspector was informed that at the time of the 2023 Inspection, Tropical featured a work force of about forty-four (44) employees combined at their Container Port Facility and the company's administrative office situated at William D. Roebuck Industrial Park, Building 1, Suite 104, Frederiksted, St. Croix, USVI 00840. According to Ms. Yhan, the cargo shipping operations by Tropical at the Facility largely occurs during the later days of the week into the weekend.

b. Review of records maintained at the Facility at time of the 2023 Inspection

Immediately following the entry meeting, the EPA Inspector inquired of Ms. Yhan the following:

- Whether Tropical have in place a program for monitoring discharges of stormwater or process waste streams associated with the company's industrial operations at the Facility and associated records?

- Whether Tropical operates Oil-Water Separators at the Facility?

- Have in file a drawing or schematic describing the layout of the Stormwater Management System for the Facility?

Ms. Yhan indicated that she was not aware of any such monitoring activities being conducted by the company nor is she aware of the existence and operation of infrastructure systems such as an oil-water separator, and that access to a drawing of schematic the Stormwater Management System for the Facility would be more readily obtained through VIPA.

Considering the unavailability of the above referenced documents on-site, the EPA Inspector could not carry-out the records review component of this 2023 Inspection. Further, the EPA Inspector informed Ms. Yhan that if additional information is

determined as required to assist EPA in completing this 2023 Inspection Report, such requests to Tropical will be issued through an electronic mail ("e-mail") correspondence following the date of the 2023 Inspection.

c. **Conduct of the Walkthrough of the Facility**

The Inspectors conducted the walkthrough, accompanied by Ms. Yhan, and evaluated the following sections of the Facility described below. The EPA Inspector made observations and preliminary findings, and also documented them through pictures, which are featured in **ATTACHMENT 1** – **TROPICAL'S March 29, 2023 NPDES Stormwater RI Photo Album**.

The walkthrough began in the very eastern section of the Facility.

1. Common Use Area 1

According to Ms. Yhan, a large area immediately on the right side upon entry into the Container Port serves as a staging lot for parked cargo containers, container chasses and iso-tanks owned by the tenants doing business at the seaport compound. It was the Inspectors' understanding that Tropical owned several of the cargo management items present at the staging lot on the date the 2023 Inspection. For purposes of this 2023 Inspection Report, the referenced section is designated as "Common Use Area 1".

i. *Potential impact to the structural integrity of Stormwater Catchment Basins*

The road surface around several of the stormwater catchment basins in this section in question appeared deteriorated and gutted-out. The existing condition could potentially lead to compromise of the structural integrity of the stormwater catchment basins. See **IMGs 6032, 6258, and 2816 of TROPICAL'S March 29, 2023 NPDES Stormwater RI Photo Album, ATTACHMENT 1,** of the 2023 Inspection Report.

ii. *Lack of Protection of Inlets of Stormwater Catchment Basins*

Identified a series of stormwater catchment basins which appeared to be inter-connected as part of the stormwater management system that drains that section of the Container Port into nearby Lime Tree Bay. Inlets of the series of stormwater catchment basins observed in the Common Use Area 1 were not outfitted with a provision to prevent or minimize the transport of sediments, gravel, and other pollutants such as residual oils and grease. See **IMGs 8864, 2954, 8118 and 3660 of TROPICAL'S March 29, 2023 NPDES Stormwater RI Photo Album, ATTACHMENT 1,** of the 2023 Inspection Report.

2. Maintenance Operations Area

Evaluation of the Facility's maintenance operations area where Tropical's fleet of vehicles and equipment are serviced revealed the following features and

concerns associated with the Facility support activity, including:

i. *Fueling terminal for servicing of company vehicles and heavy equipment*

Based on the existing set-up and positioning of two (2) fueling stations (hoses and dispensing nozzles), any accidental releases of fuel from spills and leaks that may occur during fueling operation of the fueling stations will not be readily contained. Releases of petroleum product from a diesel-fuel station will drain into and/or during wet weather events will be transported by stormwater runoff flow into a "large catchment basin"[6] covered by a metal grill situated about 10 feet slightly down gradient from the diesel-fuel station.

A gasoline fuel-station was situated uphill along the western side of the Maintenance Operations Area. Likewise, releases of petroleum product from the gasoline-fuel station will readily drain downhill along the paved surface towards the large catchment basin during both dry and wet weather conditions. See **IMGs 5366 and 5320 of TROPICAL'S March 29, 2023 NPDES Stormwater RI Photo Album, ATTACHMENT 1,** of the 2023 Inspection Report.

ii. *Potential release of pollutants from the maintenance operations area (front yard)*

Evidence revealed that stormwater runoff flow from the vicinity of the service platform in the front yard of the maintenance operations will come in contact with pollutants release on the yard surface and transported downhill towards the large catchment basin along a defined flow path into the large catchment basin during dry or wet weather events. See **IMGs 1616, 2768 and 8118** of **TROPICAL'S March 29, 2023 NPDES Stormwater RI Photo Album, ATTACHMENT 1** of this 2023 Inspection Report.

iii. *Potential release of pollutants from the maintenance service platform (rear yard)*

Evidence revealed that stormwater runoff flow from the vicinity of the service platform in the rear yard section of the maintenance operations will readily drain along the paved surface and eventually towards the western edge of the Facility and then into the shoreline of Lime Tree Bay. See **IMGs 0111, 6966 and 1793** of **TROPICAL'S March 29, 2023 NPDES Stormwater RI Photo Album, ATTACHMENT 1** of this 2023 Inspection Report.

6 A rectangular concrete catchment structure is situated below the surface grade. The catchment box is covered by a metal grill at the top of the box and is aligned with the stormwater runoff flow path. The EPA Inspector was not able to examine the referenced catchment basin.

iv. Improper disposal of potentially regulated wastes

Identified oil-soaked rags and gloves, chemical and paint residues mixed with generated refuse in a 55-gallon drums used as garbage bins staged along the front yard of the maintenance operations area. According to personnel stationed in the maintenance operations arear, accumulation refuse in the 55-gallon containers are disposed along with regular garbage. See **IMG 4022 of TROPICAL'S March 29, 2023 NPDES Stormwater RI Photo Album, ATTACHMENT 1** of this 2023 Inspection Report.

3. Other Areas of Use by Tropical at the Facility

i. Lack of Protection of Inlets of Stormwater Catchment Basins

During the walkthrough of Facility of the 2023 Inspection, the EPA Inspector did not observe any provisions that could serve as protection of the inlets of stormwater catchment basins anywhere in the Facility. In addition, evidence revealed that the inlets of stormwater catchment basins in the Facility were not properly maintained. See **IMGs 6541, 6258, 5058 and 2816 of March 29, 2023 NPDES Stormwater RI Photo Album, ATTACHMENT 1,** of the 2023 Inspection Report.

***4.* Conveyances through which Tropical Discharge Storm Water Associated with Industrial Activity[7]**

During the 2023 Inspection, the EPA Inspector identified at least **one** (1) discrete discharge point along the western fence line in the immediate vicinity of the Facility's maintenance operations area, through which stormwater associated with industrial activities that leaves the Facility eventually reaches the shoreline of Lime Tree Bay. See below for description of the discrete discharge point:

Outfall A *– A discrete stormwater conveyance through which stormwater runoff flows out of the rear yard of Maintenance Operations Area is conveyed and eventually discharged at the western fence line into Lime Tree Bay. Outfall 1 is featured in* ***IMG 1793 of Part B of TROPICAL'S March 29, 2023 NPDES Stormwater RI Photo Album, ATTACHMENT 1,*** *of the 2023 Inspection Report.*

d. **General Findings**

Based on review of information submitted by Tropical in responses to EPA's March 23, 2021, and June 17, 2022 Requests for Information letters (referenced in Section 7 above), and findings and observations made and documented during the 2023 Inspection reveal that:

[7] The EPA Inspector is numbering each outfall for identification purposes.

1. Industrial activity conducted by Tropical at its Facility meets the industrial classifications of **Marine Cargo Handling** (SIC Code 4491) **and/or a Deep Sea Domestic Transportation of Freight industry** (SIC Code 4424)**,** and that the Facility collects, conveys and discharge stormwater associated with the identified industrial activity into Lime Tree Bay (Caribbean Sea).

2. Tropical's operations at the Facility subject to the TPDES Rules and permit, and applicable regulations implementing the CWA for the discharge of stormwater associated with industrial activity into the Lime Tree Bay.

9. OTHER

All photographs featured in this 2023 Inspection Report were taken by the EPA Inspector using a Motorola cellular smartphone (Moto g Stylus 5G model) to digitally document observations and findings made. The **Tropical's March 31, 2023 NPDES SWI Photo Album** (**ATTACHMENT 1**) represents only a part of a catalog of the photographs that were taken during the 2023 Inspection using the referenced camera. The full log of photographs documented during the 2023 Inspection is recorded and available in an electronic file at EPA's USVI Office, located at 1336 Beltjen Road, St. Thomas, USVI 00802.

10. EXIT MEETING

At the conclusion of the walkthrough, the Inspectors left the Facility, and proceeded to meet with Ms. Yhan at Tropical's administrative office located at the St. Croix Industrial Complex. Ms. María Del Mar Rodríguez, AVP Hispaniola & USVI and Mr. Matthew King, Health & Safety Manager of Tropical also participated in the Exit Meeting. The EPA Inspector summarized his observations and findings made during the walkthrough of the 2023 Inspection and advised that the Agency would be issuing a formal written report reflecting all relevant concerns and observations made for the information of Tropical's management, and its advisement of corrective actions required to come into compliance with the CWA, the WPCA, and their respective implementing regulations. The EPA Inspector also advised Tropical's representatives that the documents requested but not readily available for the Agency's review during the 2023 Inspection, in addition to other information determined as required for completion of the 2023 Inspection Report, will consider the request through electronic correspondences following the date of the 2023 Inspection.

End of Report

ATTACHMENT 1 – TROPICAL'S March 29, 2023 NPDES Stormwater RI Photo Album
ATTACHMENT 2 – EPA March 24, 2023 email correspondence to Tropical

ATTACHMENT 1: TROPICAL'S March 29, 2023 NPDES Stormwater RI Photo Album

ATTACHMENT 2 – EPA March 24, 2023 email correspondence to Tropical

TROPICAL SHIPPING-CONTAINER PORT, NPDES Stormwater Reconnaissance Inspection (RI) Photo Album; 3-29-2023 Walkthrough

A. Observations that revealed potential non-compliance with regulations implementing the CWA and TPDES Stormwater Rules during the RI

IMG 8864-Storm inlet in north of CommUseArea 1. The storm inlet is not protected from the influent of gravel, sediment and trash carried by stormwater runoff flows.

IMG 6541-Storm inlet midway in CommUseArea 1. The stormwater basins are aligned in series from east to west across the referenced area.

IMG 6032-Storm inlet and concrete base in which it sits situated in mid-section of the CommUseArea 1.

IMG 2954-View of storm inlet along eastern side of CommUseArea 1.

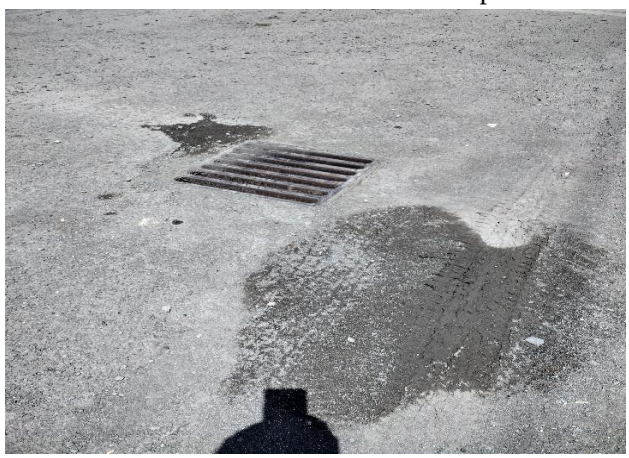
IMG 6258-Storm inlet and road surface about inlet is deteriorated, and unmaintained. Debris clogging metal grate.

IMG 5595-Unpaved south area of CommUserArea 1. Grade allows stormwater flow from east to west.

IMG 5058-Partially clogged storm inlet midway of unpaved south section of CommUserArea 1.

IMG 2816-Retention area where stormwater runoff from the unpaved south section of CommUserArea 1 is collected and drained-off. Inlets are unprotected.

IMG 0179-Sloped entrance into maintenance shed, where Tropical's vehicle fleet and equipment are regularly serviced. Potential for transport of sediments and gravel into stormwater catch basin.



IMG 3660-Accumulated sediment at base of sloped entrance into the Facility's maintenance shed area. Storm inlet unprotected from transport of sediment by stormwater runoff into stormwater catch basin.

IMG 5366-Fueling terminal unit within fenced area of Tropical's maintenance shed. Yard surface slopes toward large stormwater catch basin.

IMG 5320-Sloped yard surface towards large storm-water catch basin within the fenced area of the maintenance shed. Basin not within a containment.

IMG 1616-Stormwater runoff path observed from front of the shed flowing downhill towards a large stormwater catch basin at the low-point in the yard.

IMG 2768-Close-up of stormwater runoff path that appeared saturated with oil patches along the storm-water path towards the stormwater catch basin.

IMG 8118-View of the large stormwater catch at low point in the yard of the maintenance shed. Oil spills patches next to the puddles observed.

IMG 0111-Evidence of stormwater runoff flow path from rear side of the maintenance shed, that runs across paved yard area.

IMG 6966-Flow path of stormwater flow in the rear yard area of the maintenance shed.

IMG 1793-Evidence observed that stormwater flow within the rear yard area drains off at the western fence line of the Facility.

IMG 4022-View of oil-soaked rags, crushed tube casing of chemical materials and paint residues discarded among regular garbage.

IMG 9911-Closeup of fueling terminal unit with no containment around the system. Oil-soaked spot next to the tank, and exposed to stormwater runoff.

B. Identified outfalls for the discharge storm water associated with industrial activity from the Facility, as observed during walkthrough on March 29, 2023.

Outfall 1

IMG 1793-Discharge point where storm water from the rear yard area of the maintenance shed reaches the a point along the western fence line of the Facility, and drains into Lime Tree Bay.