

## MULTI-SECTOR GENERAL PERMIT NON-FILER INSPECTION CHECKLIST

|                                                                            |                                                                                                                                                                                                                                                                                     |                       |
|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|
| <b>Inspection Date(s):</b>                                                 | 2/8/2023                                                                                                                                                                                                                                                                            |                       |
| <b>Time:</b>                                                               | <b>Entry:</b> 10:40 AM                                                                                                                                                                                                                                                              | <b>Exit:</b> 11:45 AM |
| <b>Weather Conditions:</b>                                                 | Sunny with temperatures of approximately 40° F                                                                                                                                                                                                                                      |                       |
| <b>Media/Program:</b>                                                      | Water – CWA § 301, 402 – Industrial SW/NEC                                                                                                                                                                                                                                          |                       |
| <b>Operator Name:</b>                                                      | White Oak Mills                                                                                                                                                                                                                                                                     |                       |
| <b>Facility Name:</b>                                                      | White Oak Mills                                                                                                                                                                                                                                                                     |                       |
| <b>Permit ID or Tracking #:</b>                                            | Unpermitted at the time of the inspection                                                                                                                                                                                                                                           |                       |
| <b>SIC Code:</b>                                                           | 2048 – Prepared Feeds and Feed Ingredients for Animals and Fowls, Except Dogs and Cats<br>The Facility representative was unsure of the Facility's SIC code. The SIC code was inferred by the Inspector based on the industrial activities occurring at the time of the inspection. |                       |
| <b>Facility Address:</b>                                                   | 419 W High Street                                                                                                                                                                                                                                                                   |                       |
| <b>(city, state, zip code)</b>                                             | Elizabethtown, PA 17022                                                                                                                                                                                                                                                             |                       |
| <b>Geographic Coordinates:</b>                                             | 40.1495°, -76.6124°                                                                                                                                                                                                                                                                 |                       |
| <b>Mailing address:</b>                                                    | 419 W High St                                                                                                                                                                                                                                                                       |                       |
| <b>(city, state, zip code)</b>                                             | Elizabethtown, PA 17022                                                                                                                                                                                                                                                             |                       |
| <b>County:</b>                                                             | Lancaster                                                                                                                                                                                                                                                                           |                       |
| <b>Regular Days/Hours of Operation:</b>                                    | Monday – Friday, 7:30 AM – 5:00 PM                                                                                                                                                                                                                                                  |                       |
| <b># of Employees at location:</b>                                         | Approximately 50                                                                                                                                                                                                                                                                    |                       |
| <b>Size of Facility (in acres):</b>                                        | Estimated 10 acres                                                                                                                                                                                                                                                                  |                       |
| <b>Receiving Water(s):</b>                                                 | City of Elizabethtown municipal separate storm sewer system (MS4)                                                                                                                                                                                                                   |                       |
| <b>Date facility est. @ location:</b>                                      | 1979                                                                                                                                                                                                                                                                                |                       |
| <b>Onsite Representatives:</b>                                             |                                                                                                                                                                                                                                                                                     |                       |
| Name: Scott Hoffer                                                         | Title: Meal Manager                                                                                                                                                                                                                                                                 | Phone: (717) 278-7896 |
|                                                                            | Email: <a href="mailto:shoffer@whiteoakmills.com">shoffer@whiteoakmills.com</a>                                                                                                                                                                                                     |                       |
| <b>Authorized Official:</b> →                                              | Contacted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No                                                                                                                                                                                                      |                       |
| Name: Scott Hoffer                                                         | Title: Meal Manager                                                                                                                                                                                                                                                                 | Phone: (717) 278-7896 |
|                                                                            | Email: <a href="mailto:shoffer@whiteoakmills.com">shoffer@whiteoakmills.com</a>                                                                                                                                                                                                     |                       |
| <b>Inspector(s):</b>                                                       |                                                                                                                                                                                                                                                                                     |                       |
| Taylor Fontaine (PG Environmental)                                         | Title: Inspector                                                                                                                                                                                                                                                                    | Phone: (703) 956-1977 |
| Ivy Koberlein (U.S. EPA Headquarters)                                      | Title: Inspector                                                                                                                                                                                                                                                                    | Phone: (202) 564-2549 |
| Heather Dock (Pennsylvania Department of Environmental Protection) (PADEP) | Title: Water Quality Specialist                                                                                                                                                                                                                                                     | Phone: (717) 439-5080 |
| Patrick McGee (PADEP)                                                      | Title: Environmental Trainee (Water Quality Specialist)                                                                                                                                                                                                                             | Phone: (717) 756-5220 |

## MULTI-SECTOR GENERAL PERMIT NON-FILER INSPECTION CHECKLIST

White Oak Mills, Inc.

Inspection Date: February 8, 2023

|                                  |                                                            |                       |
|----------------------------------|------------------------------------------------------------|-----------------------|
| Shawn Lesitsky (PADEP)           | Title: Environmental Trainee<br>(Water Quality Specialist) | Phone: (717) 705-4700 |
| <b>Inspection Report Author:</b> |                                                            |                       |
| Name: Taylor Fontaine            | Signature: <i>Taylor Fontaine</i>                          | Date: 5/4/2023        |
| <b>Supervisor Review:</b>        |                                                            |                       |
| Name: Jessica Duffy              | Signature:                                                 | Date:                 |

**SECTION I – INTRODUCTION****Purpose of the Inspection**

The purpose of the inspection was to determine compliance with the industrial stormwater requirements under §§ 301 and 402(p) of the CWA and its implementing regulations found at 40 CFR Part 122.26. The inspection was unannounced and consisted of interviewing facility representatives, recording field observations, and taking photographs to document Facility conditions during the inspection. Accompanying this report is Appendix A, Aerial Map and Appendix B, Photograph Log.

**Opening Conference**

- 1) On February 8, 2023, U.S. Environmental Protection Agency (EPA) contractor, PG Environmental, conducted an unpermitted industrial facility stormwater inspection at White Oak Mills located in Elizabethtown, Pennsylvania (Facility). Taylor Fontaine of PG Environmental, Ivy Koberlein of U.S. EPA (EPA) Headquarters, Heather Dock, Shawn Lesitsky, and Patrick McGee of PADEP (EPA Inspection Team) met with the Facility representative. Taylor Fontaine displayed his Clean Water Act (CWA) credentials, and the EPA Inspection Team conducted an opening conference. The EPA Inspection Team explained the purpose of the inspection was to assess the Facility's compliance status with respect to the PAG-03 National Pollutant Discharge Elimination System (NPDES General Permit For Discharges of Stormwater Associated With Industrial Activity (Permit). At the time of the inspection, the Facility did not have coverage under the Permit.

Weather conditions at the time of the inspection were sunny with temperatures of approximately 40° F. There was no precipitation during the inspection. According to precipitation data from the National Oceanic and Atmospheric Administration (NOAA)<sup>1</sup>, the Elizabethtown, Pennsylvania area received no rain the day before the inspection.

- 2) Credentials presented to: Scott Hoffer – Meal Manager
- 3) Facility acknowledged receiving previous outreach materials or correspondence on Permit requirements? ☐ Yes ☒ No Describe:

<sup>1</sup>Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

MULTI-SECTOR GENERAL PERMIT NON-FILER INSPECTION CHECKLIST

White Oak Mills, Inc.

Inspection Date: February 8, 2023

- 4) Facility has been individually notified by permit authority or EPA that it is subject to stormwater requirements? ☐ Yes ☒ No Describe:

| FACILITY'S OPERATION & PRODUCT DESCRIPTION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>The Facility comprises an estimated 10 acres located on West High Street in the Borough of Elizabethtown, Pennsylvania. The Facility is bordered by West High Street to the south, private businesses to the west, Conoy Creek to the east, and private land to the north. The Facility includes one (1) building used as an office, several small buildings used for materials storage, one (1) large warehouse used for feed manufacturing, and three (3) large silos used for feed materials storage.</p> <p>According to the Facility representative, the Facility serves as a feed mill, manufacturing agricultural feed products for poultry, swine, and cattle. The Facility receives wheat, grain, corn etc. and processes the materials into a final product. Outdoor industrial activities exposed to stormwater include equipment parking, washing, and loading and unloading.</p> <p>Other industrial facilities owned/operated by same business entity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Describe:</p> |

**SECTION II – OBSERVATIONS**

| FACILITY OBSERVATIONS                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Pollutant Sources                                         | Observations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Loading/Unloading Operations</b>                       | The Facility has one (1) entrance off West High Street where materials are received (refer to Appendix B, Photograph DSCN5364). The Facility has one (1) covered feed loading area in the north of the Facility. A grate was observed in the floor of the feed loading area. The Facility representative indicated the grate is connected to an underground storage area accessible by Facility staff (refer to Appendix B, Photographs DSCN5410 and DSCN5411).                                                                                                                                                                                                                                                             |
| <b>Industrial Manufacturing/Processing Operations</b>     | According to the Facility representative, the Facility conducts all processing operations inside the warehouse, and they have a dust collection system to mitigate fugitive dust.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Industrial Machinery &amp; Equipment Storage</b>       | The EPA Inspection Team observed industrial machinery and equipment that was covered or confined indoors.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Storage of Industrial Materials or Products</b>        | The EPA Inspection Team observed covered and uncovered storage areas for Facility materials (refer to Appendix B, Photographs DSCN5365, DSCN5406, DSCN5410 - DSCN5413). The EPA Inspection Team observed spilled feed products on impervious surfaces in the south portion of the Facility. During the inspection, Facility staff were observed actively sweeping feed product away from a trench drain located adjacent to the loading area near the entrance off West High Street where materials are received (refer to Appendix B, Photographs DSCN5367 - DSCN5368). The trench drain did not have inlet protection around the drain and Facility representatives did not know where the drain connected or discharged. |
| <b>Liquid Storage (e.g., Tanks, Liquid Storage Drums)</b> | <p>The EPA Inspection Team observed a 12,000-gallon, double-walled diesel fuel tank in the north of the Facility (refer to Appendix B, Photographs DSCN5407 - DSCN5409).</p> <p>In the north portion of the property, a tote receiving vehicle wash water from a drain in the vehicle wash area was located on top of riprap leading into a stormwater detention basin. The tote did not have secondary containment and featured a flexible drain hose attached to the bottom of the tote, leading in the direction of the basin (refer to Appendix B, Photographs DSCN5383, DSCN5387 - DSCN5388, &amp; DSCN5392). The Facility representative did not know how the tote is emptied/serviced.</p>                           |

MULTI-SECTOR GENERAL PERMIT NON-FILER INSPECTION CHECKLIST

White Oak Mills, Inc.

Inspection Date: February 8, 2023

| FACILITY OBSERVATIONS                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Waste Storage/Disposal Areas (solid and/or hazardous)</b>                              | <p>The EPA Inspection Team observed an uncovered roll-off dumpster used for scrap metal and waste disposal (refer to <u>Appendix B, Photographs DSCN5379 and DSCN5380</u>). An unidentified white, grainy substance was observed below and appeared to be leaking from the dumpster (refer to <u>Appendix B, Photograph DSCN5381</u>).</p> <p>The EPA Inspection Team observed two (2) converted tanks used to burn waste products (e.g., burlap sacks) in the far north of the Facility (refer to Appendix B, Photograph DSCN5399- DSCN5400).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Waste Treatment Facilities (e.g., Pretreatment Systems)</b>                            | There were no observed waste treatment facilities at the Facility.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Fueling Stations/Equipment Maintenance Areas &amp; Cleaning Areas</b>                  | The EPA Inspection Team observed a 12,000-gallon, double-walled diesel fuel tank in the north portion of the Facility. A small amount of petroleum staining was observed on the pavement in front of the tank (refer to <u>Appendix B, Photographs DSCN5407 - DSCN5409</u> ).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Sediment &amp; Erosion Controls</b>                                                    | The EPA Inspection Team observed a stormwater detention basin in the north end of the property, adjacent to a paved vehicle wash area, which contained riprap erosion control, a headwall outlet structure, and an outlet pipe to the wooded area to the east of the Facility property (refer to Appendix B, Photographs DSCN5383, DSCN5386, DSCN5389, DSCN5393 - DSCN5396, DSCN5398, & DSCN5401 - DSCN5404).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Spills/Leaks Handling</b>                                                              | The EPA Inspection Team observed a spill kit adjacent to the 12,000-gallon diesel tank (refer to <u>Appendix B, Photograph DSCN5407</u> ).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Outside Shelters</b>                                                                   | <p><input type="checkbox"/> Temporary (Date Established _____) <input type="checkbox"/> Permanent</p> <p>None observed.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Evidence of non-stormwater sources/discharges (allowable if permitted under MSGP)?</b> | <p>The EPA Inspection Team observed a truck tire disinfection station on a paved area in the middle of the Facility where incoming truck tires are washed with disinfectants due to avian flu concerns. The wash water containing the disinfectants and tire wash-off was observed to flow across the paved area to the east towards riprap located on the side of a hill at the Facility's eastern boundary, beyond which was located a catch basin on the adjacent property. Facility representative stated the catch basin connects to a municipal storm sewer system. The catch basin appears to receive runoff from the Facility's truck tire disinfection station and general stormwater runoff from the Facility (refer to <u>Appendix B, Photographs DSCN5369 &amp; DSCN5371 - DSCN5375</u>). Note the discoloration of the grass/ground around the catch basin</p> <p>The EPA Inspection Team observed a tote which receives vehicle wash water from a drain in the vehicle wash area in the north portion of the Facility. The tote was located on top of riprap leading into an adjacent stormwater detention basin. The tote did not have secondary containment and featured a flexible drain hose attached to the bottom of the tote, leading in the direction of basin (refer to Appendix B, Photographs DSCN5383 &amp; DSCN5387 - DSCN5388, &amp; DSCN5392). The Facility representative did not know how the tote is emptied/serviced.</p> <p>The EPA Inspection Team observed several areas of white / gray discoloration on the grassed and/or soil ground surface in wooded areas just east of the stormwater detention basin, including one area adjacent to the basin outlet pipe. It was unclear what caused the discoloration (refer to Appendix B, Photographs (refer to Appendix B, Photographs DSCN5390- DSCN5391, DSCN5393, &amp; DSCN5397).</p> |

MULTI-SECTOR GENERAL PERMIT NON-FILER INSPECTION CHECKLIST

White Oak Mills, Inc.

Inspection Date: February 8, 2023

| FACILITY OBSERVATIONS                              |                |
|----------------------------------------------------|----------------|
| Evidence of process wastewater sources/discharges? | None observed. |

| OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Number and description of each potential Stormwater Discharge Point from the Facility                                                                                                                                  | The EPA Inspection Team observed one discharge point from a stormwater detention basin in the north portion of the property, and two (2) potential stormwater discharge points from the property over land along the east border of the Facility. Refer to Appendix A for an aerial view of the Facility and identified stormwater discharge points                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Evidence of pollutants migrating off the Facility property (stains, deposits, ponding) at discharge points, into Receiving Waters or in MS4                                                                            | The EPA Inspection team observed wash water from a truck tire washing station containing disinfectants and tire wash-off migrating towards a catch basin located off the Facility property to the east. The Facility representative stated the catch basin connects to a municipal storm sewer system (refer to <u>Appendix B, Photographs DSCN5369 &amp; DSCN5371 - DSCN5375</u> ).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Evidence of Non-stormwater Discharges leaving the Facility (authorized or unauthorized)                                                                                                                                | The EPA Inspection Team observed an unauthorized non-stormwater discharge from a truck tire washing station containing disinfectants and tire wash-off migrating towards a catch basin located off the Facility property to the east. The Facility representative stated the catch basin connects to a municipal storm sewer system (refer to <u>Appendix B, Photographs DSCN5369 &amp; DSCN5371 - DSCN5375</u> ).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Description of general gradients/slopes at the Facility, all apparent discharge points, and discharge pathway from Facility to Receiving Water or MS4 (storm drains, channel, swale, ditches, driveway, pipes, & etc.) | <p>Stormwater from the Facility appears to generally drain to the east overland. Conoy Creek is located approximately 100 yards to the east of the Facility. The EPA Inspection Team did not observe a direct stormwater conveyance (e.g. a drainage pipe or swale) between the Facility and Conoy Creek. The Facility did not have any perimeter fencing or walls.</p> <p>Stormwater from the very southern portion of the Facility appears to drain north across a paved area towards the Facility, away from West High Street (refer to <u>Appendix B, Photograph DSCN5366</u>).</p> <p>Stormwater in the middle to southern portion of the Facility either sheet flows off the Facility property to the east or, according to the Facility representative, is conveyed through several catch basins/drains and discharges to the MS4 (refer to <u>Appendix B, Photographs DSCN5369, DSCN5371 - DSCN5373, DSCN5375, DSCN5416, DSCN5418, and DSCN5419</u>).</p> <p>Stormwater drainage from the north portion of the Facility is conveyed into a stormwater detention basin that discharges off the Facility property into a wooded area (refer to <u>Appendix B, Photographs DSCN5383, DSCN5386, DSCN5389, DSCN5393 - DSCN5396, DSCN5398, &amp; DSCN5401 - DSCN5404</u>).</p> <p>Refer to <u>Appendix A</u> for an aerial view of the Facility and identified stormwater flow paths / discharge points.</p> |

### SECTION III – AREAS OF CONCERN

- 1) The EPA Inspection Team observed Facility processing feed products, an industrial activity classified under SIC Code 2048 – Prepared Feeds and Feed Ingredients for Animals and Fowls, Except Dogs and Cats.
  - a. Businesses classified under SIC Code 2048 are regulated under 40 C.F.R. § 122.26 for stormwater discharges associated with industrial activity.

- b. The EPA Inspection Team observed that the Facility discharges stormwater from areas with industrial activity to drop inlets connected to the MS4.
  - c. The EPA Inspection Team did not observe a stormwater flow path or direct connection between the Facility and the Conoy Creek, the closest surface water to the Facility.
  - d. The Facility did not have coverage under the Permit at the time of the inspection.
- 2) The EPA Inspection Team observed spilled feed products on impervious surfaces in the south portion of the Facility. During the inspection, Facility staff were observed actively sweeping feed product away from a trench drain located adjacent to the loading area near the entrance off West High Street where materials are received (refer to Appendix B, Photographs DSCN5367 - DSCN5368). The trench drain did not have inlet protection around the drain and Facility representatives did not know where the drain connected or discharged.
- 3) In the north portion of the property, a tote receiving vehicle wash water from a drain in a vehicle wash area was located on top of riprap leading into a stormwater detention basin. The tote did not have secondary containment and featured a flexible drain hose attached to the bottom of the tote, leading in the direction of basin (refer to Appendix B, Photographs DSCN5383 & DSCN5387 - DSCN5388, & DSCN5392). The Facility representative did not know how the tote is emptied/serviced.
- 4) The EPA Inspection Team observed an uncovered roll-off dumpster used for scrap metal and waste disposal (refer to Appendix B, Photographs DSCN5379 and DSCN5380). An unidentified white, grainy substance was observed below and appeared to be leaking from the dumpster (refer to Appendix B, Photograph DSCN5381).
- 5) The EPA Inspection Team observed a 12,000-gallon, double-walled diesel fuel tank in the north portion of the Facility. A small amount of petroleum staining was observed on the pavement in front of the tank (refer to Appendix B, Photographs DSCN5407 - DSCN5409).
- 6) During the inspection, the EPA Inspection Team observed an unauthorized non-stormwater discharge from a truck tire washing station containing disinfectants and tire wash-off migrating towards a catch basin located off the Facility property to the east. The Facility representative stated the catch basin connects to a municipal storm sewer system (refer to Appendix B, Photographs DSCN5369 & DSCN5371 - DSCN5375).
- 7) The EPA Inspection Team observed a tote which receives vehicle wash water from a drain in the vehicle wash area in the north portion of the Facility. The tote was located on top of riprap leading into an adjacent stormwater detention basin. The tote did not have secondary containment and featured a flexible drain hose attached to the bottom of the tote, leading in the direction of basin (refer to Appendix B, Photographs DSCN5383 & DSCN5387 - DSCN5388, & DSCN5392). The Facility representative did not know how the tote is emptied/serviced.

- 8) The EPA Inspection Team observed several areas of white / gray discoloration on the grassed and/or soil ground surface in wooded areas just east of the stormwater detention basin, including one area adjacent to the basin outlet pipe. It was unclear what caused the discoloration (refer to Appendix B, Photographs DSCN5390- DSCN5391, DSCN5393, & DSCN5397).
- 9) The EPA Inspection Team observed several drains/inlets without protection to help mitigate the discharge of pollutants off the Facility property (refer to Appendix B, Photographs DSCN5367, DSCN5371, DSCN5373, DSCN5375, DSCN5382, DSCN5385, DSCN5416, DSCN5418, and DSCN5419).

#### **SECTION IV – CLOSING CONFERENCE**

After the Facility walk, the EPA Inspection Team met with the Facility representative from White Oak Mills, Inc. for a closing conference and shared preliminary observations. The EPA Inspection Team reiterated that all preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared were subject to further investigation by the EPA Inspection Team. Additional observations may be contained in this inspection report that were not identified at the time of the closing conference.

The inspection concluded at approximately 11:45 AM (EST).

#### **SECTION V – LIST OF APPENDICES**

*Appendix A – Aerial Map*

*Appendix B – Photograph Log*