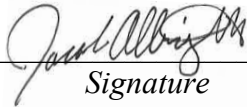




**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION III
CLEAN WATER ACT
COMPLIANCE INSPECTION REPORT**

for

Name of Site: Skyland Holdings
Site Address: 2626 Naylor Road SE, Washington DC, 20020
Mailing Address: 2626 Naylor Road SE, Washington DC, 20020

Report Prepared on: April 28, 2022 By: , PG
Date Signature

Report Final as of: _____ By: _____, EPA
Date Signature

General Information

Type of Inspection: Construction Stormwater
Owner: WC Smith
Operator: L.F. Jennings
Permittee: L.F. Jennings
NOI Submittal Date: 11/04/2020
Date of CGP Coverage: Unknown
NPDES ID: DCR10008H
Project Start Date: 11/14/2020
Estimated Project End Date: 06/01/2027
Area to be Disturbed (acres): 13
Receiving Water and/or MS4: Washington, D.C. MS4

On-Site Inspection Overview

On March 24, 2022, U.S. Environmental Protection Agency (EPA) contractors from PG Environmental and Eastern Research Group, Inc. (ERG) and a representative from EPA Headquarters (hereinafter, EPA Inspection Team) conducted a construction stormwater inspection of the Skyland Holdings construction site at 2626 Naylor Road SE in Washington, DC (hereinafter, site). Staff from the Washington, DC Department of Energy and Environment (DOEE) was present for the inspection.

Inspection Date: March 24, 2022 **Entry Time:** 9:15 AM (EDT) **Exit Time:** 11:35 AM (EDT)

Unique Project Identifier (UPI): 3E22WN014A

I. INTRODUCTION

On March 24, 2022, U.S. Environmental Protection Agency (EPA) contractors from PG Environmental and Eastern Research Group, Inc. (ERG) and a representative from EPA Headquarters (hereinafter, EPA Inspection Team) conducted a construction stormwater inspection of the Skyland Holdings construction site at 2626 Naylor Road SE in Washington, DC (hereinafter, site). Staff from the Washington, DC Department of Energy and Environment (DOEE) was present for the inspection. The primary purpose of the inspection was to observe compliance with EPA's 2017 National Pollutant Discharge Elimination System (NPDES) Construction General Permit (hereinafter, CGP or Permit). A copy of the Permit is provided in Appendix A. Photographs taken during the inspection by Mr. Jake Albright of PG Environmental and Ms. Kelly Davis of ERG are provided in Appendix B, and supporting documentation is provided in Appendix C.

Description of Construction Site

According to the project's Notice of Intent to discharge under the CGP (NOI), the entire development encompasses approximately 13 acres, of which about 8 acres was either actively under construction at the time of the inspection or stabilized within the construction area; the active disturbed area accounted for approximately 3 acres at the time of the inspection. Approximately 5 acres of the development had been completed, which included commercial and apartment buildings and parking lots. The construction activity ongoing at the time of the inspection was for a Lidl grocery store. The site had been graded and vertical construction of the grocery store was taking place.

According to site representatives, the project started in 2018; however, the NOI was not submitted until November 2020. Due to a lack of records available onsite, the EPA Inspection Team was unable to verify the date of groundbreaking. Site representatives forecasted completion of the development by the end of 2022.

The site was accessed by a paved construction entrance on Alabama Avenue SE. An entrance was also located at the northwest corner of the site on Naylor Road SE; however, it was not in use at the time of the inspection. Runoff from the site discharged to the Washington, DC Municipal Separate Storm Sewer System (MS4). Stormwater inlets were observed along the south perimeter of the active site and in the completed parking lot south of the site. Runoff in the eastern and northern areas of the site sheet flowed offsite into natural swales and ravines that appeared to convey runoff to areas with DC MS4 storm drains. Storm drains receiving runoff from the site area were observed north of the development, on 28th Street SE. WC Smith is the owner and developer of the site. LF Jennings is the general contractor and permittee. Strittmatter was responsible for maintaining the stormwater controls. Teel Construction, Inc. was performing the vertical construction of the grocery store and was the only contractor onsite at the time of the inspection. Representatives from Teel Construction stated that the site contractors had not been at the site for multiple weeks prior to the EPA inspection.

II. INSPECTION PROCESS

Inspection Opening Conference

Mr. Jake Albright with PG Environmental presented his Clean Water Act inspector credential to the site representative upon arrival at the site. The EPA Inspection Team explained that the purpose of the inspection was to observe compliance with the CGP. The EPA Inspection Team informed the site representatives that any information 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. Table 1 describes the individuals that participated in the inspection.

Table 1. Inspection Participants

Name	Title/Affiliation	Contact Information
Inspectors:		
Jake Albright	Inspector – PG Environmental (U.S. EPA Contractor)	Phone: (703) 956-1957 Email: jake.albright@pgenv.com
Kelly Davis	Inspector – ERG (U.S. EPA Contractor)	Phone: (703) 633-1646 Email: kelly.davis@erg.com
John Kosco	Inspector – U.S. EPA Headquarters	Phone: (202) 564-1858 Email: kosco.john@epa.gov
DOEE Representative:		
Emmanuel Allen	Inspector – DOEE	Phone: (202) 934-3299 Email: Emmanuel.allen1@dc.gov
Izanami Navarro	Inspector – DOEE	Email: izanami.navarro@dc.gov
Site Representative:		
Donny Pratt	Teel Construction, Inc.	Phone: (703) 759-4754 Email: dpratt@teelconstruction.com

Weather and Precipitation:

During the inspection, it was overcast with temperatures averaging approximately 50 degrees Fahrenheit. Periods of heavy rain were experienced during the day prior to the inspection. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and 5 days prior are provided in Table 2.

Table 2. Precipitation Preceding Inspection of Skyland Holdings

Station Name	Date	Precipitation Amount (inches) ¹
WASHINGTON REAGAN NATIONAL AIRPORT, VA US USW00013743	March 19, 2022	Trace
WASHINGTON REAGAN NATIONAL AIRPORT, VA US USW00013743	March 20, 2022	Trace
WASHINGTON REAGAN NATIONAL AIRPORT, VA US USW00013743	March 21, 2022	0.00
WASHINGTON REAGAN NATIONAL AIRPORT, VA US USW00013743	March 22, 2022	0.00
WASHINGTON REAGAN NATIONAL AIRPORT, VA US USW00013743	March 23, 2022	0.49
WASHINGTON REAGAN NATIONAL AIRPORT, VA US USW00013743	March 24, 2022	0.02

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

Records Review

During the inspection, the EPA Inspection Team requested to review documentation regarding compliance with the Permit and implementation of the Permittee's Stormwater Pollution Prevention Plan (SWPPP). The EPA Inspection Team requested to review the SWPPP, the Notice of Intent (NOI), inspection reports, and erosion and sediment control (E&S) plans during the onsite inspection; however, these documents were not available for review onsite. Additionally, the EPA Inspection Team requested the documents from Mr. Brian McLaughlin of WC Smith following the inspection, but they had not been provided at the time this report was written. A copy of the NOI was obtained from EPA's eNOI database (refer to Appendix C, Exhibit 1).

III. PERMIT REQUIREMENTS AND OBSERVATIONS

During the inspection, the EPA Inspection Team observed E&S best management practices (BMPs), areas of disturbance, stormwater discharge points, material handling and storage areas, construction entrances/exits, and stormwater drainage/conveyance areas. The EPA Inspection Team presented its preliminary observations to the site representative at the site during the closing conference. The observations detailed below were made pursuant to provisions of the 2017 CGP.

Inspection Observations

Permit Part 7.3 states that, "You must keep a current copy of your SWPPP at the site or at an easily accessible location so that it can be made available at the time of an on-site inspection or upon request by EPA; a state, tribal, or local agency approving stormwater management plans; the operator of a storm sewer system receiving discharges from the site; or representatives of the U.S. Fish and Wildlife Service (USFWS) or the National Marine Fisheries Service (NMFS)..."

If an on-site location is unavailable to keep the SWPPP when no personnel are present, notice of the plan's location must be posted near the main entrance of your construction site."

Observation 1. The SWPPP, including site inspection reports, NOI, and other related permit documents was not available onsite at the time of the inspection. Site representatives were unsure which contractor was responsible for SWPPP implementation and inspections. Site representatives from Teel reviewed the layout of the site with the EPA Inspection Team using the utility plans for the Lidl part of the project.

Permit Part 7.2.4 requires permittees to, "Include a legible map, or series of maps, showing the following features of the site:

- a. Boundaries of the property;
- b. Locations where construction activities will occur, including:
 - i. Locations where earth-disturbing activities will occur (note any phasing), including any demolition activities;
 - ii. Approximate slopes before and after major grading activities (note any steep slopes (as defined in Appendix A));
 - iii. Locations where sediment, soil, or other construction materials will be stockpiled;

- iv. Any water of the U.S. crossings;
 - v. Designated points where vehicles will exit onto paved roads;
 - vi. Locations of structures and other impervious surfaces upon completion of construction; and
 - vii. Locations of on-site and off-site construction support activity areas covered by this permit (see Part 1.2.1c).
- c. Locations of all waters of the U.S. within and one mile downstream of the site's discharge point. Also identify if any are listed as impaired, or are identified as a Tier 2, Tier 2.5, or Tier 3 water;
 - d. Areas of federally listed critical habitat within the site and/or at discharge locations;
 - e. Type and extent of pre-construction cover on the site (e.g., vegetative cover, forest, pasture, pavement, structures);
 - f. Drainage patterns of stormwater and authorized non-stormwater before and after major grading activities;
 - g. Stormwater and authorized non-stormwater discharge locations, including:
 - i. Locations where stormwater and/or authorized non-stormwater will be discharged to storm drain inlets;⁵⁶ and
 - ii. Locations where stormwater or authorized non-stormwater will be discharged directly to waters of the U.S.
 - h. Locations of all potential pollutant-generating activities identified in Part 7.2.3g;
 - i. Locations of stormwater controls, including natural buffer areas and any shared controls utilized to comply with this permit; and
 - j. Locations where polymers, flocculants, or other treatment chemicals will be used and stored.”

56: The requirement to show storm drain inlets in the immediate vicinity of the site on your site map only applies to those inlets that are easily identifiable from your site or from a publicly accessible area immediately adjacent to your site.”

- Observation 2.** The EPA Inspection Team observed the onsite maps did not reflect all Permit requirements. The onsite maps showed post-construction development, site grading, utilities, and other post-construction features (refer to Appendix C, Exhibit 2). However, the site maps did not include the following:
- Boundaries of the development property.
 - Locations where all construction activities would occur.
 - Type and extent of pre-construction cover on the site (e.g., vegetative cover, forest, pasture, pavement, structures).
 - Drainage patterns of stormwater and authorized non-stormwater before and after major grading activities.
 - Stormwater discharge locations. Stormwater inlets were located in the south area of the site (refer to Appendix B, Photographs 1 through 7). DOEE also stated that stormwater inlets were located in the parking lot south of the site. The EPA Inspection Team also observed inlets north of the site that appeared to receive runoff from the site (refer to Appendix B, Photographs 8 through 10). It was unclear if the inlets led to the city storm sewer system or another location.
 - Locations of all potential pollutant-generating activities identified in Part 7.2.3.g. The EPA Inspection Team observed approximately twelve unlabeled and uncovered drums in the northwest area of the site (refer to

Appendix B, Photographs 11 through 16); approximately 24 partially covered buckets labeled to be porcelain on a wooden pallet (refer to Appendix B, Photograph 17); approximately 30 uncovered cement bags in the northwest area of the site, roughly 8 of which were opened (refer to Appendix B, Photograph 18); approximately 15 uncovered buckets and boxes of electronics in the mid-west area of the site (refer to Appendix B, Photograph 19); one uncovered bucket that contained paint residue (refer to Appendix B, Photograph 20); and one uncovered and unlabeled bag on a wood pallet (refer to Appendix B, Photograph 21).

- Locations of stormwater controls. The EPA Inspection Team observed silt fencing along sections of the east, north, and west perimeter (refer to Appendix B, Photographs 22 through 24); filter socks along sections of the west perimeter (refer to Appendix B, Photograph 25); filter fabric at stormwater inlets in the south area (refer to Appendix B, Photographs 1 and 2); silt fencing and filter socks located around curb inlets in the south area (refer to Appendix B, Photographs 3 through 7); and a wash rack at the north construction site entrance (refer to Appendix B, Photograph 26).

Permit Part 1.5 requires the permittee to, “post a sign or other notice of your permit coverage at a safe, publicly accessible location in close proximity to the construction site... At a minimum, the notice must include:

- a. The NPDES ID (i.e., permit tracking number assigned to your NOI);
- b. A contact name and phone number for obtaining additional construction site information;
- c. The Uniform Resource Locator (URL) for the SWPPP (if available), or the following statement: “If you would like to obtain a copy of the Stormwater Pollution Prevention Plan (SWPPP) for this site, contact the EPA Regional Office at [include the appropriate CGP Regional Office contact information found at <https://www.epa.gov/npdes/contact-us-stormwater#regional>];” and
- d. The following statement ‘If you observe indicators of stormwater pollutants in the discharge or in the receiving waterbody, contact the EPA through the following website: <https://www.epa.gov/enforcement/report-environmental-violations>.’”

Observation 3. The EPA Inspection Team observed the following Permit-required elements were not posted on a sign or other notice of permit coverage at the site:

- The NPDES ID.
- A URL for the SWPPP or a statement to request a copy of the SWPPP from the EPA Regional Office if desired.
- A statement to contact EPA if indicators of stormwater pollutants in the discharge or receiving waterbody are observed.

The EPA Inspection Team observed a Teel Construction, Inc. sign on the south perimeter that did not provide the Permit-required elements (refer to Appendix B, Photograph 27). The EPA Inspection Team did not observe a sign at the northwest construction entrance (refer to Appendix B, Photograph 28).

Permit Part 2.2.4 requires permittees to,

- a. “Use appropriate stabilization techniques¹⁵ at all points that exit onto paved roads...
- b. Implement additional track-out controls¹⁷ as necessary to ensure that sediment removal occurs prior to vehicle exit; and
- c. Where sediment has been tracked-out from your site onto paved roads, sidewalks, or other paved areas outside of your site, remove the deposited sediment by the end of the same business day in which the track-out occurs or by the end of the next business day if track-out occurs on a non-business day. Remove the track-out by sweeping, shoveling, or vacuuming these surfaces, or by using other similarly effective means of sediment removal...

15: Examples of appropriate stabilization techniques include the use of aggregate stone with an underlying geotextile or non-woven filter fabric, and turf mats.

17: Examples of additional track-out controls include the use of wheel washing, rumble strips, and rattle plates.”

Observation 4. The EPA Inspection Team observed sediment track-out along the paved entrance that led to the disturbed area of the site (refer to Appendix B, Photograph 29). Storm drains that were connected to the DC MS4 were observed in the area, protected by filter logs and filter fabric (refer to Appendix B, Photographs 1 through 7). The access location to disturbed area of the site was not protected with a stabilized construction entrance.

Permit Part 2.2.10 requires the permittee to,

- a. “Install inlet protection measures that remove sediment from discharges prior to entry into any storm drain inlet that carries stormwater flow from your site to a water of the U.S., provided you have authority to access the storm drain inlet;²³ and
- b. Clean, or remove and replace, the protection measures as sediment accumulates, the filter becomes clogged, and/or performance is compromised. Where there is evidence of sediment accumulation adjacent to the inlet protection measure, remove the deposited sediment by the end of the same business day in which it is found or by the end of the following business day if removal by the same business day is not feasible.”

Observation 5. The EPA Inspection Team observed filter fabric covering stormwater inlets in the south area of the site that needed maintenance (refer to Appendix B, Photographs 1 and 2). Specifically, sediment had accumulated inside the filter fabric.

The EPA Inspection Team also observed filter socks covering curb inlets in the south area of the site that needed maintenance (refer to Appendix B, Photographs 5 and 7). Specifically, the socks appeared to be worn and full of sediment at the time of the inspection. Additionally, silt fences surrounding the curb inlets had collapsed (refer to Appendix B, Photographs 3 through 7). The surrounding soil was disturbed.

Permit Part 2.2.3 requires the permittee to, “Install sediment controls along any perimeter areas of the site that will receive pollutant discharges.¹⁴

- a. Remove sediment before it has accumulated to one-half of the above-ground height of any perimeter control.

14: Examples of perimeter controls include filter berms, silt fences, vegetative strips, and temporary diversion dikes.”

- Observation 6.** Perimeter controls were not observed along the following locations that appeared would receive pollutant discharges (e.g., sediment-laden runoff):
- Along the east perimeter downgradient of unstabilized soil (refer to Appendix B, Photographs 22, 30, and 31). The EPA Inspection Team observed sediment-laden water, trash, and debris collected at the southeast corner of the site and upgradient of the corner (refer to Appendix B, Photographs 32 through 36).
 - Along the west perimeter adjacent to unstabilized soil (refer to Appendix B, Photographs 37 through 45). The EPA Inspection Team observed sediment offsite adjacent to these locations on the other side of a wood fence that ran along the west perimeter (refer to Appendix B, Photographs 38, 42, 44, and 45).
 - Along the middle of the west perimeter, in the north area of the site, downgradient of a large pond of water that contained construction debris and trash (refer to Appendix B, Photographs 46 through 49). The EPA Inspection Team observed a collapsed silt fence in the pooled water (refer to Appendix B, Photograph 50) and a portable toilet located adjacent to the perimeter (refer to Appendix B, Photograph 51). The portable toilet did not have a containment pan or have any other observable secondary containment. The EPA Inspection Team observed sediment off-site adjacent to this location on the other side of a wood fence that ran along the west perimeter (refer to Appendix B, Photograph 52).
 - Along the southwest and south perimeters downgradient of loose sediment on pavement (refer to Appendix B, Photographs 53 and 54).
- Observation 7.** The EPA Inspection Team observed accumulated sediment above one-half the height of the filter socks along the western perimeter (refer to Appendix B, Photograph 55).
- Observation 8.** The EPA Inspection Team observed sediment, debris, erosion and collapsed silt fence at a location along the eastern perimeter (refer to Appendix B, Photographs 56 through 60). The location was downgradient of a stabilized stockpile that showed evidence of erosion (refer to Appendix B, Photograph 57). The EPA Inspection Team observed collapsed silt fences located along the stabilized stockpile upgradient of the erosion (refer to Appendix B, Photograph 58). A large gully was observed offsite and adjacent to the location (refer to Appendix B, Photograph 61).
- Observation 9.** The EPA Inspection Team observed collapsed silt fencing along the east perimeter of the site (refer to Appendix B, Photographs 62, 63, and 66).

Permit Part 2.3.3.e states that the permittee must, “For construction and domestic wastes:⁴¹

- i. Provide waste containers (e.g., dumpster, trash receptacle) of sufficient size and number to contain construction and domestic wastes;
- ii. Keep waste container lids closed when not in use and close lids at the end of the business day for those containers that are actively used throughout the day. For waste containers that do not have lids, provide either (1) cover (e.g., a tarp, plastic sheeting, temporary roof) to minimize exposure of wastes to precipitation, or (2) a similarly effective means designed to minimize the discharge of pollutants (e.g., secondary containment);
- iii. On business days, clean up and dispose of waste in designated waste containers; and
- iv. Clean up immediately if containers overflow.
- v. For sanitary waste, position portable toilets so that they are secure and will not be tipped or knocked over, and located away from waters of the U.S. and stormwater inlets or conveyances.

41: Examples of construction and domestic waste include packaging materials, scrap construction materials, masonry products, timber, pipe and electrical cuttings, plastics, styrofoam, concrete, demolition debris; and other trash or building materials.”

Observation 10. The EPA Inspection Team observed a portable toilet located on the west perimeter in the north area of the site (refer to [Appendix B, Photograph 51](#)). The portable toilet did not have a containment pan or have any other observable secondary containment. The portable toilet was located adjacent to a large pond of water that contained construction debris and trash (refer to [Appendix B, Photographs 46 through 50](#)). Perimeter controls were not located downgradient of the portable toilet (refer to [Appendix B, Photograph 49](#)). Refer to Observation 6 for more information.

Observation 11. The EPA Inspection Team observed an uncovered overflowing dumpster located in the northern area of the site, and construction waste next to the dumpster (refer to [Appendix B, Photographs 64 and 65](#)).

Observation 12. The EPA Inspection Team observed pooled stormwater, trash, and debris offsite downgradient of a steep slope in the north area (refer to [Appendix B, Photographs 66 through 74](#)). A silt fence was installed downgradient of the steep slope along the northern perimeter (refer to [Appendix B, Photographs 23 and 67](#)). During the inspection, the EPA Inspection Team observed the pooled stormwater flowing through the trash and debris downgradient into a curb inlet (refer to [Appendix B, Photographs 10 and 68 through 74](#)). Another unidentifiable inlet was located underneath debris and downgradient of the silt fence steep slope (refer to [Appendix B, Photograph 8 and 9](#)). It also appeared to receive discharge from the site. It was unclear whether the inlet connected to the DC MS4.

Permit Part 2.3.3.a states that the permittee must, “For building materials and building products³⁹, provide either (1) cover (e.g., plastic sheeting, temporary roofs) to minimize the exposure of these products to precipitation and to stormwater, or (2) a similarly effective means designed to minimize the discharge of pollutants from these areas.

39: Examples of building materials and building products typically present at construction sites include asphalt sealants, copper flashing, roofing materials, adhesives, concrete admixtures, and gravel and mulch stockpiles.”

Observation 13. The EPA Inspection Team observed approximately twelve uncovered and unlabeled drums in the northern area of the site (refer to Appendix B, Photographs 11 through 16). The lids were on the drums; however, they were not located within secondary containment and appeared to be full. One of the drums revealed through a rusted hole to be filled with soil (refer to Appendix B, Photograph 12).

Observation 14. The EPA Inspection Team observed the following building materials and products not located in secondary containment in the north area of the site:

- Approximately 24 partially covered buckets labeled to be porcelain on a wooden pallet (refer to Appendix B, Photograph 17).
- Approximately 30 uncovered bags of cement in the north area of the site (refer to Appendix B, Photograph 18). Approximately 8 of those bags were opened.
- Approximately 15 uncovered boxes and buckets of electronics (refer to Appendix B, Photograph 19). Stormwater was pooled in some of the buckets.
- An uncovered bucket that contained paint residue (refer to Appendix B, Photograph 20).
- One uncovered and unlabeled bag on a wood pallet (refer to Appendix B, Photograph 21).

Permit Part 1.3.1 through 1.3.5 states that prohibited discharges include:

“Wastewater from washout of concrete, unless managed by an appropriate control as described in Part 2.3.4.”

“Wastewater from washout and cleanout of stucco, paint, form release oils, curing compounds, and other construction materials.”

“Fuels, oils, or other pollutants used in vehicle and equipment operation and maintenance.”

“Soaps, solvents, or detergents used in vehicle and equipment washing or external building washdown.”

“Toxic or hazardous substances from a spill or other release.”

Permit Part 1.3 states, “To prevent the above-listed prohibited non-stormwater discharges, operators must comply with the applicable pollution prevention requirements in Part 2.3.”

Observation 15. The EPA Inspection Team observed an unlabeled dripping pipe that ran underneath the stabilized construction entrance at the northwest corner of the site (refer to Appendix B, Photographs 75 and 76). The pipe faced the north perimeter of the site. It was unclear where the pipe connected and the origin of the flow.

Permit Part 2.2.5 states that the permittee must, “Manage stockpiles or land clearing debris piles composed, in whole or in part, of sediment and/or soil:

- a. Locate the piles outside of any natural buffers established under Part 2.2.1 and away from any stormwater conveyances, drain inlets, and areas where stormwater flow is concentrated;
- b. Install a sediment barrier along all downgradient perimeter areas;¹⁹
- c. For piles that will be unused for 14 or more days, provide cover²⁰ or appropriate temporary stabilization (consistent with Part 2.2.14);”

19: Examples of sediment barriers include berms, dikes, fiber rolls, silt fences, sandbags, gravel bags, or straw bale.

20: Examples of cover include tarps, blown straw and hydroseeding.

Observation 16. The EPA Inspection Team observed four unstabilized and uncovered stockpiles in the area north of active construction (refer to [Appendix B, Photographs 77 through 82](#)). The site representative stated that Teel was not using three of the four stockpiles, and only add (i.e., do not take soil from) to one minimally when soil needs to be removed from the building footprint (refer to [Appendix B, Photograph 82](#)).

Closing Conference

After the site walk, the EPA Inspection Team met with the site representative from Teel 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 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 the additional review of materials following the inspection.

The inspection concluded at approximately 11:35 AM (EDT).