Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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July 19, 2021

Buzz Kleemann, Plant Engineer
Dominion Terminal Associates LLP
600 Harbor Rd – Pier 11
Newport News, VA 23607

Re: Technical Inspection Report, VA0057576

Dear Mr. Kleemann:

Enclosed is a copy of the report for the inspection conducted at the above referenced facility on June 17, 2021. Please note the deficiencies cited in this report and implement appropriate corrective measures in order to ensure continued permit compliance. **Within thirty (30) days of receipt of this report, you are requested to submit documentation illustrating that the necessary corrections have been made.**

If you have any questions regarding this report or associated documents, please contact me at (757) 518-2027 or via email at steven.long@deq.virginia.gov.

Sincerely,

Steven J.E. Long
Environmental Specialist II

Enclosure

cc: DEQ/TRO: File

Facility:	**Dominion Terminal Associates LLP**
County/city:	**Newport News**

VPDES NO.	**VA0057576**

DEPARTMENT OF ENVIRONMENTAL QUALITY
INDIVIDUAL PERMIT
INSPECTION REPORT

Inspection date:	**June 17, 2021**	Date form completed:	**July 1, 2021**
Inspection by:	**Steven J.E. Long**	Time spent:	10 hours
Inspection agency:	**DEQ/TRO**	Reviewed by:	Julie Laferriere 7/13/21
Present at inspection:	**Buzz Kleemann, Plant Engineer**		
Type of Inspection:	(√) Routine; ( ) Re-inspection; ( ) Compliance/assistance/complaint		
Date of previous inspection:	**6/9/16**		
Term:	**01/01/2017 – 12/31/2021 VPDES Permit (9VAC25-31)**		
Copies sent to:	(√) DEQ/TRO; (√) Owner; ( ) Operator; ( ) Other:		

FACILITY TYPE:	FACILITY CLASS:
( ) Municipal	( ) Major
(√) Industrial	(√) Minor
( ) Federal	( ) Small
( ) VPA/NDC	( ) High Priority ( ) Low Priority

2nd Quarter Monitoring 2020:	Flow (MGD)	pH (s.u.)	TSS (mg/l)	3rd Quarter Monitoring 2020:	Flow (MGD)	pH (s.u.)	TSS (mg/l)
Outfall 001	**0.228**	**7.2**	**2.5**	**Outfall 001**	**0.415**	**8.3**	**7.0**
4th Quarter Monitoring 2020:	Flow (MGD)	pH (s.u.)	TSS (mg/l)	1st Quarter Monitoring 2021:	Flow (MGD)	pH (s.u.)	TSS (mg/l)
Outfall 001	**0.359**	**8.0**	**2.6**	**Outfall 001**	**0.456**	**7.5**	**3.1**

Annual Monitoring 2020:	TP (mg/L)	TN (mg/L)	TPH (mg/l)	TKN (mg/L)	NO_3-NO_2 (mg/l)	
Outfall 001	**Samples were not obtained. Reported as NR. Revision needed for eDMR reporting "X"**					

Has there been any new construction or significant changes to the facility?	YES		NO	√
If yes, Department notified? Plans and specifications approved?	YES	**NA**	NO	
DEQ approval date:	**NA**			

X indicates noncompliance; See narrative below for numbered footnotes

	OPERATIONS AND MAINTENANCE MANUAL INCLUDES THE FOLLOWING:	YES	NO
1.	Outfall location, sample collection preservation and analysis.		X[3]
2.	Procedures for measuring, recording the duration and volume of treated wastewater discharged.	√	
3.	Best Management Practices if applicable.	√	
4.	Procedures for handling, storing, disposing of all wastes, fluids, pollutants. Types and quantity listed.	√	
5.	Discussion of treatment works design, operations and preventative maintenance. Inventory of spare part. Record keeping.	√	
6.	Management and disposal of waste solids and residues.	√	
7.	Hours of operation and staffing requirements for effective operations.	√	
8.	List of facility, local and state emergency contacts.	√	
9.	Procedures for reporting and responding to spills, overflows, treatment works and upsets.	√	
COMMENTS:	**The O&M Manual does not include all of the preservation requirements**		

	SAMPLING	YES	NO
1.	Sampling locations provide representative samples.	√	
2.	Sample types correspond to VPDES permit requirements.	√	
3.	Sampling frequencies correspond to VPDES permit requirements.		X[4]
4.	Plant maintains required records of sampling.	√	
5.	Composite samples collected in proportion to flow.	**NA**	
6.	Composite samples refrigerated during collection.	**NA**	
7.	Does the plant run operational control tests?	**NA**	
COMMENTS:	**2020 Annual monitoring was not performed.**		

	TESTING PERFORMED BY:							
1.	Testing performed:	Plant		Central Lab		Commercial Lab		√
	Name: **Universal Laboratories**		VELAP #: 460036					
	IF THE PLANT PERFORMS TESTING, PLEASE COMPLETE QUESTIONS 2-5							
2.	Total residual chlorine method used.		**NA**					
3.	Plant equipment sufficient to perform required tests.				YES	**NA**	NO	
4.	Testing equipment clean and/or operable.				YES	**NA**	NO	
5.	Operational control test run by the plant.				YES	**NA**	NO	
COMMENTS:								

ITEMS OF NONCOMPLIANCE IDENTIFIED IN LAST INSPECTION CORRECTED:	YES	NO
Update the site map to include all of the discharges including those non-stormwater discharges at the facility.		X[6]
Expand the routine site inspections to find and correct issues for the site including those observed during this visit.	√	
Insure that all aspects of permit compliance are reviewed, including sampling, and report non-compliance issues in the comprehensive site compliance evaluation.	√	
Resubmit the Discharge Monitoring Report for the 2nd semi-annual monitoring period eliminating the report of "no discharge" and instead report failure to monitor as required by the permit.	√	
Improve the housekeeping efforts around the north maintenance building; appropriately manage all materials to prevent spills and leakage. If a spill or leak does occur immediately provide for cleanup of the materials.	√	

UNIT PROCESS:	**Industrial Ponds**

		YES	NO	NA
1.	Type: Aerated [ ] Unaerated [ ] Polishing [√]			
2.	Number of cells: **3 ponds**			
3.	Number cells in operation: **3**			
4.	Operation of system			
	Series [√] Parallel [ ] Other: [ ]			
5.	Color: Light Brown [ ]			
	Gray [√] Brown [√] Green [ ] Other: **Colorless**			
6.	*EVIDENCE OF THE FOLLOWING PROBLEMS:*			
	Vegetation in lagoon or dikes?		√	
	Rodents burrowing on dikes?		√	
	Erosion?		√	
	Sludge bars?			√
	Excessive foam?			√
	Floating material?	√		
7.	If aerated, are lagoon contents mixed adequately?			√
8.	If aerated, is aeration system operating properly?			√
9.	Odors: Septic [ ] Earthy [ ] None [√] Other: [ ]			
10.	Fencing intact?	√		
11.	Grass maintained properly?			√
12.	Level control valves working properly?	√		
13.	Effluent discharge elevation? Top [√] Middle [ ] Bottom [ ]			
14.	Freeboard (ft): **>5 feet for all basins**			
15.	Appearance of effluent? GOOD [ ] FAIR [ ] POOR [ ]			√
16.	Are monitoring wells present?			√
	Are wells adequately protected from runoff?			√
	Are caps on and secured?			√

COMMENTS:	**Pond 1 and 3 receive the runoff or pumped discharges from the facility. Flow between the ponds is available. Some floating material observed in Ponds 1 and 3 though none observed in Pond 2 The only discharge is from Pond 2, Outfall 001.**

UNIT PROCESS:	**Outfall 001**

		YES	NO	NA
1.	Type of outfall: Shore Based [√] Submerged [ ]			
2.	*TYPE IF SHORE BASED:*			
	Wingwall [ ] Headwall [ ] Rip Rap [ ] Pipe [√]			
3.	Flapper valve present?		√	
4.	Erosion of bank area?			√
5.	Effluent plume visible?			√
6.	Condition of outfall and the supporting structure?			
	GOOD [√] FAIR [ ] POOR [ ]			
7.	*FINAL EFFLUENT, EVIDENCE OF FOLLOWING PROBLEMS?*			
	Oil sheen?			√
	Grease?			√
	Sludge bar?			√
	Turbid effluent?			√
	Visible foam?			√
	Unusual color?			√

COMMENTS:	**Outfall 001 is a pipe through the bulkhead wall near the south corner of the facility. A discharge was not observed during the inspection.**

	INTRODUCTION
	DEQ arrived at Dominion Terminals Associates LLP (DTA) on June 17, 2021 at 0900 and met with Mr. Buzz Kleemann, Plant Engineer to conduct a scheduled inspection. The inspection was scheduled due to the COVID-19 pandemic. General weather conditions were sunny and warm with temperatures in the mid-70's. The previous rain event totaled 0.45" inches and occurred seven days prior. The site visit ended at approximately 1230. DTA is a 96 acre coal transshipment facility receiving coal by rail and loading on to ships. The facility uses water for dust suppression with all process water and stormwater commingled and conveyed to Ponds 1 and 3 for settling. Sodium hydroxide is added to the ditches and ponds for pH treatment with the coal runoff typically acidic. Water is then transferred to Pond 2 for final settling and discharge at Outfall 001.
	SITE SURVEY
X[1]	The following staff observations were made during the site survey: • The survey started at the south side of the facility from the administrative building to the surge silos, to Ponds 1-3, the south maintenance building and then ended at the north maintenance building. The entire site was not observed with the interior area of coal pile and stacker/reclaimers only viewed from a distance. Travel from the south was along the maintenance road that parallel the drainage ditch on the east site. Several areas were observed with coal fines on the roadway and in the various conveyances to the pond that will need routine cleanup. Cleaning was observed in one area and likely continues as needed at the other areas. The north maintenance area was improved from previous visits though housekeeping can still be implemented for the swales filled with solids and oil spills and stains observed. See photos 2-4, 14, 17-20 for some examples of areas needing cleanup. • No issues were observed for the south maintenance facility. • The north maintenance area did have spills that should be cleaned up. A railway spill pad had some spillage on the pad that could be cleaned up and prevented from reaching the oil water separator associated with the pad. Cleaning eliminates the entrainment of the oil in the stormwater and will extend the time for cleanout of the separator. See photos 14-16. • Spillage was also observed near a locomotive near the maintenance building with free product on a spill pad. The liquid can be removed eliminating the exposure and will prevent runoff to the gravel in the areas. See photos 19 and 20. • Multiple conveyances and buildings were observed at the facility that are not shown on the site map. See photos 1-5, 9, 1117-19, 22 and 23. All conveyances and structures are to be shown on the site map. See below for map requirements and citations. Permit Part I.C.4.b.(6).(b).i requires for the permittee to keep clean all exposed areas of the facility. **Permit Part I.C.4.b.(6).(b).i "Good Housekeeping. The permittee shall keep clean all exposed areas of the facility that are potential sources of pollutants to stormwater discharges."**
	RECORDS
	The following staff observations were made for the records reviewed.
X[2]	**<u>Operations and Maintenance (O&M) Manual</u>** The O&M Manual was provided electronically, has a published date of March 2017 and was signed and certified on 4/5/17 by an employee that retired January 2018. Permit Part I.B.2 states that the O&M manual is to be kept current. Changes in personnel that signed the manual and listed in the emergency contact needed to be updated in the manual. **Permit Part I.B.2 "Operations and Maintenance Manual The permittee shall maintain a current Operations and Maintenance Manual for the treatment works that is in accordance with Virginia Pollution Discharge Elimination System Regulation, 9VAC25-31".**
X[3]	The manual does states that the contract laboratory performs all sample collections for the facility. The only preservation requirements noted in the manual is placement of the samples on ice. Acid preservation and specific analysis methods is not included in the manual as required by Permit Part I.B.2.a. **Permit Part I.B.2.a. "Permitted outfall locations and techniques to be employed in the collection, preservation, and analysis of effluent, storm water and sludge samples;"** For spill responding and reporting, the manual references a Spill Prevention Control and Countermeasure Plan (SPCC) though that manual was not included with the SWPPP. Any manual reference needs to be included as part of the SWPPP for review.

Quarterly Visual Monitoring (QVM):
The facility does not have a stormwater only discharge. Visual observation for the commingle valve control discharges are documented on the discharge logs. It is suggested that information be included in the SWPPP noting that the facility does not include stormwater only discharges and that the QVM is not performed as stated in the permit. Additional information for the discharge log visual observation can be included.

Effluent Limitation Monitoring
Quarterly and annual effluent limitation monitoring is required by the permit. Quarterly eDMR submissions with the Chain of Custody and laboratory records were available in the eDMR system. One item was noted for the reporting of the estimated flow. All discharges are logged and include the estimated flow for the discharge. Different estimated flow averages and maximums are reported for each of the quarters indicating that the frequency of monitoring is more than the minimum 1/3M. The correct frequency of monitoring for the flow should be reported. For the 1st quarter of 2021 there were 12 days with discharges reported. The correct frequency should be 12/3M. For all future eDMR submissions, enter the actual frequency of monitoring for the flow for the quarter. Please note that if eDMR prevents entering the actual frequency, report "Other" with the actual frequency reported in the comment section.

X[4] A review of the 2020 annual eDMR submission found all of the results reported as NR (not reported) with the comments stating that an annual sample was not taken during the calendar 2020 year. Permit Part I.A.1 requires 1/Year monitoring for TN, TPH, TKN and Nitrite + Nitrate.

> **Permit Part I.A.1 During the period beginning with the permit's effective date and lasting until the permit's expiration date, the permittee is authorized to discharge from outfall(s): 001.**

EFFLUENT CHARACTERISTICS	MONITORING REQUIREMENTS	
	Frequency	Sample Type
Total Phosphorus (mg/l)	1/Year	Grab
Total Nitrogen (mg/l)	1/Year	Calc
Total Petroleum Hydrocarbons (mg/l)	1/Year	Grab
Total Kjeldahl Nitrogen (mg/l)	1/Year	Grab
Nitrite + Nitrate (mg/l)	1/Year	Grab

1/Year = Between January 1st and December 31st.

Instructions to revise the eDMR submission replacing the NR with "X" have been provided with the revision still pending.

Stormwater Pollution Prevention Plan (SWPPP):
X[5] The SWPPP was provided electronically, has a published date of March 2017 and was signed and certified on 4/5/17 by an employee that retired January 2018. Changes to the SWPPP team eliminating the Superintendent Engineering and adding the Plant Engineer should have occurred that include a revision date and new certification and signature. SWPPP modification is required by Permit Part I.C.4.f.(2) within 30 days of an event that requires SWPPP modification.

> **Permit Part I.C.4.f.(2) "SWPPP modifications shall be made within 30 calendar days after discovery, observation or event requiring a SWPPP modification."**

Site Map:
Three site maps were provided for review, Figure 1 is an aerial of the facility; Figure 2 is the Drainage Plan with a revision date of January 2020; the third map is titled Containment Dikes, dated March 3, 2021 and shows the secondary containment areas and several storage tanks. The SWPPP includes a vicinity map (no date), a site map and a separate drainage plan both with revision time given as March 2017. The SWPPP notes that the facility is 96 acres with 72 acres impervious. Section 4.1 reports that the railway tracks and the open areas on the north portion of the facility are pervious. All of the rail beds and open area on the north are covered with rock or are hard pack dirt and should be considered impervious. The areas should be re-evaluated.

X[6] The maps do not include all of the items specified by Permit Part I.C.4.b.(2).(c). Not all of the buildings and covered storages locations are shown; the location of all of the stormwater conveyance, ditches, pipes, swales, and inlets are not shown; the pump station connections and discharge are not shown; the location of structural and source control measure are not shown; the spill area near Reclaimer #3 is not provided; the location of fueling stations, cleaning areas, liquid storage tanks, location of all nonstormwater discharges is not included.

The attached photos show several items that are not included on the site map.

Buildings and covered storage areas are not shown on the north side of the site, see photos 13, 15-19 and 24. Conveyances, pipes and ditches not shown: See photos 1-5, 9, 11, 13, 17-19, 22, and 23. Spill pads, oil water separators and rail car dust suppression are not shown, see photos 14-17. Fueling from ST-31 is not shown, see photos 15 and 16. Two truck washing/rinsing areas were observed at the maintenance buildings, the north facility is shown in photos 21 and 22. The sodium hydroxide storage tanks at the ponds or at various locations for chemical addition is not provided, see photos 8 and 11. The dust suppression systems is not shown on any of the maps.

Permit Part I.C.4.b.(2).(c) "Site Map A site map identifying the following:
(ii) The location and extent of significant structures and impervious surfaces (roofs, paved areas and other impervious areas);
(iii) Locations of all stormwater conveyances including ditches, pipes, swales, and inlets, and the directions of stormwater flow (use arrows to show which ways stormwater will flow);
(iv) Locations of all existing structural and source control measures, including BMPs;
(vi) Locations of potential pollutant sources;
(vii) Locations where significant spills or leaks identified under Part I.C.4.b(4) have occurred;
(viii) Locations of the following activities where such activities are exposed to precipitation: fueling stations; vehicle and equipment maintenance and cleaning areas; loading and unloading areas; locations used for the treatment, storage or disposal of wastes; liquid storage tanks; processing and storage areas; access roads, rail cars and tracks; transfer areas for substances in bulk; and machinery;
(x) Location and description of all non-stormwater discharges;

Employee Training:
The SWPPP states that employee training is performed annually with the most recent training occurring on February 24, 26, and 28, 2021. The employee training includes all requirements of Permit Part I.C.4.b.(6).(vi).

Routine Facility Inspections:
The SWPPP states that routine facility inspections are performed quarterly and are done as PMs. Inspection records for 2020 and 2021 were requested with only records for 2021 provided for review. The inspection records included monthly storage tanks, dikes and potable tanks inspections and quarterly inspections of the coal storage piles, maintenance areas and ponds. The quarterly inspections were performed on 2/5/21 and 6/8/21. It was reported that none of the inspections were performed during a rain event or during a discharge as required by Permit Part I.C.4.b.(6).(v).

X[7] Discussed during the visit, the intent of the inspection during a discharge event was to observe the facility during a rain event and discharge. With Outfall 001 discharge manually control, the inspection should be performed during rainfall with discharges to the ponds.

The routine inspections reviewed do not include all of the information required by Permit Part Permit Part I.C.4.b.(6).(v). The weather information, description of discharges if occurring, previously unidentified discharges of pollutants, control measures needing maintenance or repairs, failed controls measures in need of replacement, incidence(s) of noncompliance, or if additional control measures are needed are not documented.

Permit Part Permit Part I.C.4.b.(6).(v) "At least once each calendar year, the routine facility inspection must be conducted during a period when a stormwater discharge is occurring.

The results of the inspections shall be documented in the SWPPP, and shall include at a minimum:
(A) The inspection date and time;
(B) The name and signature of the inspector(s);
(C) Weather information and a description of any discharges occurring at the time of the inspection;
(D) Any previously unidentified discharges of pollutants from the site;
(E) Any control measures needing maintenance or repairs;
(F) Any failed control measures that need replacement;
(G) Any incidents of noncompliance observed; and
(H) Any additional control measures needed to comply with the permit requirements."

Comprehensive Site Compliance Evaluation:
The 2019 comprehensive site compliance evaluation was performed 11/12/19 and signed with appropriate certifications on 11/15/19. The scope and summary report meet the permit requirements.

X[8] The 2020 comprehensive site compliance evaluation was performed on 1/15/21 and 1/24/21 reviewing the previous year. Permit Part I.C.4.d requires the comprehensive site compliance evaluation at least once each calendar year.

Permit Part I.C.4.d Comprehensive Site Compliance Evaluation

	The permittee shall conduct comprehensive site compliance evaluations at least once each calendar year.
X[9]	The evaluation for 2020 did report that the annual monitoring for 2020 was not performed and was noted as an incident of noncompliance. The document has the two certifications, one for signing in accordance with Permit Part II.K and the other certification for compliance with the SWPPP and the permit both required by Part I.C.4.d.(3) The Part II.K certification was not signed and the certification of compliance with the SWPPP and the permit was signed though there were reports of noncompliance. **Permit Part I.C.4.d.(3) "Compliance Evaluation Report** **The report shall identify any incidents of noncompliance that were observed. Where a report does not identify any incidents of noncompliance, the report shall contain a certification that the facility is in compliance with the SWPPP and this permit. The report shall be signed in accordance with Part II.K and maintained with the SWPPP."**

ITEMS OF NONCOMPLIANCE	
X[1]	**Areas of the facility were observed that were not kept clean as required by Permit Part I.C.4.b.(6).(b).i.**
X[2]	**The O&M Manual was not updated with changes to personnel signing the manual retired. Permit Part I.B.2 requires that the permittee maintain a current O&M Manual.**
X[3]	**The O&M Manual does not include all techniques for preservation and analysis of the samples as required by Permit Part I.B.2.a.**
X[4]	**Annual monitoring, required by Permit Part I.A.1 was not conducted as required for 2020. The eDMR needs revision to properly reflect the missed sampling.**
X[5]	**The SWPPP was not updated with changes to the personnel signing the plan retired. Permit Part I.C.4.f.(2) requires SWPPP modification within 30 days of an event requiring SWPPP modification.**
X[6]	**The SWPPP site map does not include all of the required items specified by Permit Part I.C.4.b.(2).(c).**
X[7]	**A routine site inspection performed during a discharge event was not documented; the routine inspection documented do not include all of the required information all required by Permit Part I.C.4.b.(6).(v).**
X[8]	**A comprehensive site compliance evaluation was not performed in the calendar year of 2020 as required by Permit Part I.C.4.d.**
X[9]	**The comprehensive site compliance evaluation that was documented reviewing 2020 was not signed and certified as required by Permit Part I.C.4.d.(3).**

1) South side of Harbor Road, east of the administration building and west of pump station (PS) #2 with a conveyance not show on the site map.

2) Drop inlet and (foreground) and trench drain (arrow) leading to PS #2. The inlet and the pump station is shown on the map, the trench drain is not shown on the map. Sweeping of the area is needed. Cleanup of solids was observed at another location.

3) View to the north, southeast of the surge silos with coal fines collecting in the concrete swale with discharge to the catch basin shown in photo 4. Cleanup is needed in this area too.

4) Catch basin near pier 11. This and the swale that this drains to is not shown on the map. The water in the photo is the James River.

5) Swale along the bulkhead with pier 11 in the background. This drains to PS #3 that then pumps to PS #4 with discharge to Pond 1 or 3.

6) Pond 2 effluent piping with discharge to the outfall, shown in photo 7.

7) Outfall 001 to the James River.

8) Pond 3, looking to the northeast. The containers have NaOH for neutralizing the pH.

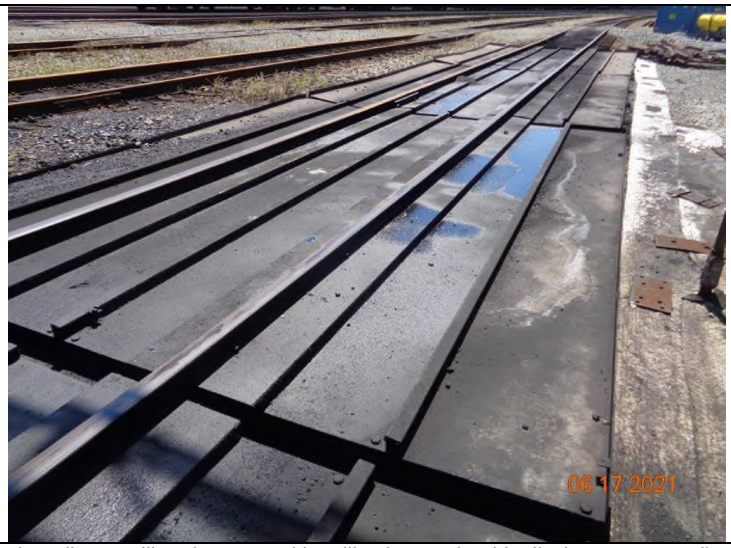
9) View to the southwest showing Pond1. A pipe, circled, was observed near the southeast corner of the pond. This conveyance is not shown on the site map. Coal fines have been pushed together for eventual collection.

10) View of Pond 1 looking to the north. The culvert connection between Ponds 1 and 3 is in the foreground.

11) One of several NaOH containers placed in the facility for pH control. The circle shows two pipes that are not shown on the map. Multiple pipes are located in the ditch line that are not shown on the map.

12) Dust control system working on the east side of the yard.

13) North maintenance area. The locomotive and the drip pads in the rail bed are also shown in photos 17-20. The maintenance building is in the background with covered storage and Quonset style building not on the map.



14) Railway spill pad system with spills observed. This discharges to an oil water separator. This is adjacent to CD-2 (containment dike) shown in the next 2 photos on the north end of the facility.

15) Oil water separator access. The blue building is CD-2 and contains ST (storage tank) -7. The storage tank shown above is ST-31. CD-2 is shown on the containment dikes map. ST-7 is not shown on either map.

16) The building is CD 2 and the tank is ST 31. The spill pad shown in photo 14 is to the right. The iron support is the railcar dust suppression system that is not shown on the maps. The suppression system is shown in photo 18 too.

17) View to the south with the maintenance building in the background. The concrete swale and the Quonset style building are not shown on the map. This will connect to the main ditch system south of the maintenance building. The locomotive shown in 13 and 19-20 is circled.

18) View to the north with the same Quonset style building shown in 17 and the locomotive just to the left. This is the continuation of the concrete swale shown in 17. The railcar dust suppression is circled.

19) Close up of the rail bed shown in photo 13 with oil on the white spill pads. The same Quonset building and concrete swale can also be seen.

20) The circle shows areas where oil has either been spilled or seeped through the ballast.

21) Maintenance building looking to the north. A drop inlet, included on the map is in the foreground. The area circled is a truck washing/rinsing area

22) End of the concrete swale that started near CD-2 covered storage (See photos 17-19) The same truck circled in photo 21 is shown in this photos with that area a wash/rinse location.

23) Maintenance building looking to the north. Concrete swale shown in 17-19 and 22 is in the foreground. An additional pipe from the northeast side of the building to the concrete swale is shown that is not included on the map.

24) North corner of the maintenance building with covered storage and Quonset building observed that is not on the site map.