



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Four Penn Center
1600 JFK Blvd.
Philadelphia, Pennsylvania 19103-2029

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): 05/15/2024
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Industrial Stormwater CEI
Site/Facility Name: Langhorne Scrap Metal Processing Facility
Permittee(s): Langhorne Scrap Metal Processing Facility
Site/Facility Operator: Nedal Abuhumoud
Site/Facility Address: 2320 Big Oak Road
Langhorne, PA 19047
Latitude: 40.197586 **Longitude:** -74.886987
County/Parish: Bucks County
Permit Number: PAG030090
NAICS Code: 423930 **SIC:** 5093
DSB ID: ECAD-5487

Site/Facility Representative(s):	Point of Contact
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I. Introduction

On May 15, 2024, an inspection team composed of staff from the U.S. Environmental Protection Agency (“EPA”) Region III (hereinafter, “EPA Inspection Team”) conducted an industrial stormwater inspection of the Langhorne Scrap Metal Processing Facility (hereinafter, the “Site” or “Facility”). The purpose of the inspection was to observe compliance with the Clean Water Act (CWA) and to verify compliance with the Facility’s National Pollutant Discharge Elimination System (NPDES) Permit No. PAG030090 (hereinafter, the “Permit”) and applicable State and Federal regulations.

A. Inspection Opening Conference

The EPA Inspection Team arrived at the Facility approximately 9:15 a.m. for the inspection. Inspectors met with the following Facility representatives:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Jeffrey Broudy	USEPA Region 3	(215) 814-2726	Broudy.Jeffrey@epa.gov
Kaitlin McLaughlin	USEPA Region 3	(215) 814-2393	McLaughlin.Kaitlin@epa.gov
Site/Facility Representatives			
Nedal Abuhumoud	Langhorne Scrap Metal President	(215) 750-0800	nedalsinc@aol.com
Kenneth Woodruff	Kenneth L. Woodruff and Associates	(215) 736-2194	kwood@bellatlantic.net

Jeffrey Broudy and Kaitlin McLaughlin displayed their credentials to Mr. Nedal Abuhumoud and Kenneth Woodruff at the onset of the inspection, and explained the purpose of the inspection was to observe compliance with its Permit. A copy of the Permit is provided in Attachment 1. The EPA Inspection Team informed Mr. Abuhumoud that any information that the Facility deemed to be confidential business information (“CBI”) should be identified to EPA representatives during the inspection and it would be handled as CBI according to EPA’s CBI procedures. Mr. Abuhumoud stated that the Facility did not have CBI to identify.

B. Weather and Precipitation Conditions

During the inspection, the weather was mostly cloudy and approximately 60° F, with a chance of rain. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and 5 days prior are provided in the Table 2 below:

Table 2. Precipitation Data

Station Name	Date	Precipitation Amount (inches) ¹
LANGHORNE 2.8 NE, PA US	5/10/2024	0.19
LANGHORNE 2.8 NE, PA US	5/11/2024	0.23
LANGHORNE 2.8 NE, PA US	5/12/2024	0.11
LANGHORNE 2.8 NE, PA US	5/13/2024	0.08
LANGHORNE 2.8 NE, PA US	5/14/2024	0.04
LANGHORNE 2.8 NE, PA US	5/15/2024	0.00

C. Summary of the Facility

The Facility is located at 2320 Big Oak Road, Langhorne, PA 19047. The Permit identifies the permittee as Langhorne Scrap Metal Processing, Inc., which uses the same address.

The Facility has one outfall that discharges to a Pennsylvania Department of Environmental Protection (PADEP) recognized wetland which then flows directly into Mill Creek, which is tributary to the Delaware River.

The facility operates as a scrap metal processing and recycling facility on approximately 4.05 acres of property. The facility employs 14 personnel and operates Monday through Friday from 8:00 AM to 4:30 PM and on Saturday from 8:00 AM to 1:00 PM. The scrap metal is supplied by various companies and the general public. The Facility has multiple areas on-site where different materials are sorted and are recycled or sold and distributed to buyers. After the metal is screened and accepted at the Facility, the metal or metal products are brought to their respective holding pile location to be sorted through at a later time.

The following activities are conducted at the facility: the storage and cutting of scrap, the bailing of scrap, support activities using on-site equipment to mechanically sort and reduce the size of scrap metals for repurposing into new metal, and the preparation of various metals to be shipped or distributed elsewhere. The Facility houses a warehouse, an office area, a shredder, several pieces of heavy equipment, and outdoor storage.

There are no steep slopes at the Facility and, in the majority of the areas that heavy machinery is utilized, the ground is paved with asphalt. Mr. Abuhumoud stated that all Facility run-off flows into one of several stormwater inlets directing stormwater through the one of Facility's two oil/water separators. He stated that the separators are emptied as necessary or at least annually by their contractor, Atlantic Oil.

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

Previously, the Facility had issues with oil leaking off-site and was found in violation of PADEP regulations during three inspections dated February 11, 2020, October 14, 2020, and March 22, 2021 (Attachment 3). Mr. Abuhumoud stated that as of March 2024, the Facility no longer accepts vehicles that contain an engine, transmission, or any other oil containing parts due to the amount of fluid they potentially contain.

II. Facility Activity

During the inspection, the EPA Inspection Team observed: truck entrance and scale, office area, inactive shredder, stormwater inlets that lead to the oil/water separator, Outfall 1, the wetland which discharges to Mill Creek, and each of the scrap metal storage areas. The inspection observations were made pursuant to the requirements of the Permit. The observations from the inspection are described in detail below in the Observations section. Photographs were taken during the inspection by Jeffrey Broudy and Kaitlin McLaughlin and are provided in Attachment 2.

III. Observations

After the inspection opening conference, the Inspection Team performed a Facility walkthrough. As part of the inspection, the Inspection Team visually observed Facility conditions and documented those conditions through photographs. The following section presents the Inspection Team's observations relative to the Facility's Permit requirements.

Section 3.4.A of the Permit requires:

The permittee shall develop and implement a PPC Plan in accordance with 25 Pa. Code § 91.34 following the guidance contained in DEP's "Guidelines for the Development and Implementation of Environmental Emergency Response Plans" (DEP ID 400-2200-001), its NPDES-specific addendum, and the minimum requirements...

PPC Plan – Best Management Practices – Scrap Metal Processing – Item 7:

Filter inserts including oil absorbing media are to be installed and maintained in all catch basins. They shall be inspected monthly and cleaned or replaced as needed.

Observation 01:

The inspection team observed a stormwater inlet that had filters which were not fully intact and was letting sediment into the storm drain (Attachment 2, Photographs P5150004, P5150005, P5150006).

Observation 02:

The inspection team observed the stormwater inlet prior to Outfall 1 that had an elevated water level. The surface water had a slight but visible oil sheen (Attachment 2, Photograph P5150014).

Section I.C.2 of the Permit requires: *The permittee may not discharge oil and grease in amounts that cause a film or sheen upon or discoloration of the waters of this Commonwealth or adjoining shoreline. (25 Pa. Code §§ 92a.48(a)(2), 95.2(2))*

Observation 03:

The inspection team observed a puddle along the side of Big Oak Road down gradient from the Facility which had a visible oil sheen on top (Attachment 2, Photograph P5150030).

Observation 04:

The inspection team observed an oil sheen behind the office building near one of the oil/water separators (Attachment 2, Photograph P5150037).

Section 3.4.A of the Permit requires: *The permittee shall develop and implement a PPC Plan in accordance with 25 Pa. Code § 91.34 following the guidance contained in DEP's "Guidelines for the Development and Implementation of Environmental Emergency Response Plans" (DEP ID 400-2200-001), its NPDES-specific addendum, and the minimum requirements...*

PPC Plan – Best Management Practices – 3.7 Housekeeping: *Maintain organized work areas both inside and outside.*

Observation 05:

The inspection team observed outdoor areas that had poor housekeeping (Attachment 2, Photographs P5150056 and P5150060).

Section IV.A.4 of the Permit requires: *Minimize contact of residual liquids and particulate matter from materials stored indoors or under cover with surface runoff through implementation of control measures.*

Observation 06:

Multiple piles of various materials (metal, tires, etc) were placed outside without cover (Attachment 2 Photographs P5150033, P5150046, P5150050, P5150052, P5150054, and P5150066)

IV. Records Review

During the opening conference, the EPA Inspection Team reviewed documentation including: NPDES Permit PAG030090 (Attachment 1), DMRs, PPC Plan (Attachment 4), Facility SOPs, previous PADEP inspections, previous violations, previous improvement plans, training documentation, lab reports (Attachments 5 and 6), and an annual report (Attachment 7). All documents reviewed at the time of the inspection were requested to be sent to the EPA Inspection Team in an electronic format. Each of the documents were received via secure file transfer on May 27, 2024.

According to EPA's Integrated Compliance Information System (ICIS) database, the Facility did not experience any Permit effluent limit exceedances from Outfall 001 from the previous five-year period (1/2019 – 5/2024).

Facility representatives stated that they planned to pave the area located behind the office building at some point if funding becomes available.

Appendix P.III of the Permit requires: *The permittee must monitor and report analytical results for the pollutants listed below on Discharge Monitoring Reports (DMRs) for representative outfalls.*

Observation 07:

The inspection team observed detections of contaminants found by Eurofins Lab from a report dated 7/20/2023. Specifically, aluminum, copper, iron, lead, zinc, total suspended solids, and chemical oxygen demand all had results above their respective reporting limits that were in ICIS, but not visible due to the data not properly syncing (Attachment 5). Although each of those analytes were found, the only one above the benchmark value shown in the Permit was chemical oxygen demand with a result of 256 mg/l with a benchmark of 120 mg/l.

Additionally, a lab report from 1/12/2024 showed detections of nitrate, aluminum, copper, iron, lead, zinc, total nitrogen, total suspended solids, phosphorus, chemical oxygen demand, and nitrogen (Attachment 6). None of the contaminants were over the benchmark values listed in the Permit.

The permit also states: if the permittee's sampling demonstrates exceedances of benchmark values for two or more consecutive monitoring periods, the permittee shall take action in accordance with Part C V.I of this General Permit. Due to only one lab report showing a benchmark exceedance, an action is not required at this time.

V. Closing Conference

After the facility walk, the EPA Inspection Team met with the Facility representatives for a closing conference. The EPA Inspection Team shared preliminary observations with the Facility. The EPA Inspection Team reiterated to the Facility representatives that all preliminary observations

discussed were not compliance determinations. Any and all preliminary observations shared were subject to further investigation by EPA upon the additional review of records and documentation. Additional observations may be contained in this inspection report that were not identified at the time of the closing conference after EPA reviewed additional materials following the inspection.

The inspection concluded at approximately 11:35 a.m.

VI. List of Attachments

- Attachment 1: NPDES Permit PAG030090
- Attachment 2: Photograph Log
- Attachment 3: PADEP Penalty Assessment Agreement
- Attachment 4: PPC Plan
- Attachment 5: Eurofins Lab Report (7/20/2023)
- Attachment 6: Eurofins Lab Report (1/12/2024)
- Attachment 7: Annual Report (9/26/2023)