



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1600 JFK Boulevard
Philadelphia, Pennsylvania 19103-2029

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): 05/03/2023
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Industrial Stormwater
Site/Facility Name: AIM Recycling Erie East Avenue Facility
Permittee(s): AIM Recycling Erie LLC
Site/Facility Operator: AIM Recycling Erie, LLC
Site/Facility Address: 1515 East Ave
Erie, PA 16503
Latitude: 42.12866 **Longitude:** -80.0571
County/Parish: Erie
Permit Number: PAR608311 A-2
NAICS Code: 423930 **SIC:** 5093
Unique Project #: 3E23WN078A

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

On May 3, 2023, 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 AIM Recycling, Erie LLC facility (hereinafter, “the facility”) located at 1515 East Ave and 1431 East Ave, Erie PA 16503. 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. PAR608311 A-2 (hereinafter, the “Permit”) and applicable State and Federal regulations.

A. Inspection Opening Conference

The EPA Inspection Team arrived at the facility at est. 8:30 AM 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			
Angela Weisel	Lead EPA Inspector	215-814-2124	Weisel.angela@epa.gov
Ingrid Hopkins	EPA Inspector	215-814-5437	Hopkins.ingrid@epa.gov
Dominic Cotton	EPA Inspector	215-814-2046	Cotton.dominic@epa.gov
Site/Facility Representatives			
Geoffrey Heitzenrater	AIM Recycling, Erie LLC	716-909-7962	gheitzenrater@aim-recycling.com
Joseph Immorino	AIM Recycling, Erie LLC	216-973-2426	jimmorino@aim-recycling.com
State or County Representatives			
Shane Krause	Erie County Department of Health	814-460-0351	skrause@eriecountypa.gov
Jesse Stiles	Erie County Department of Health	814-451-6778	jstiles@eriecountypa.gov

Angela Weisel displayed her credentials to facility representatives 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 A. The EPA Inspection Team informed facility representatives 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.

B. Weather and Precipitation Conditions

During the inspection, it rained slightly, growing heavier throughout 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 the Table 2 below:

Table 2. Precipitation Data

Station Name	Date	Precipitation Amount (inches)
ERIE INTERNATIONAL AIRPORT, PA US USW00014860	04/28/23	0.07
ERIE INTERNATIONAL AIRPORT, PA US USW00014860	04/29/23	0.09
ERIE INTERNATIONAL AIRPORT, PA US USW00014860	04/30/23	0.01
ERIE INTERNATIONAL AIRPORT, PA US USW00014860	05/01/23	0.19
ERIE INTERNATIONAL AIRPORT, PA US USW00014860	05/02/23	0.50
ERIE INTERNATIONAL AIRPORT, PA US USW00014860	05/03/23	0.32

C. Summary of the Facility

AIM Recycling Erie, LLC is located in Erie, PA. The facility operates as a metal scrap processing and recycling facility on approximately 20.32 acres of land. The facility employs approximately 35 employees and operates Monday through Friday from 7:30 AM to 3:30 PM. The facility is divided into a northern and southern facility by an active rail line running East to West. The scrap metal is supplied by various companies and the general public. Upon entrance, trucks are weighed, screened for radiation, and inspected by camera according to the facility's Inbound Material Inspection Form (Attachment C, Exhibit 3). Metal is then accepted or denied based on the facility's Scrap Acceptance Agreement (Attachment C, Exhibit 2) that outlines what is prohibited. After acceptance, metal is sorted into different piles for storage. The following activities are conducted at the facility: the storage and cutting of scrap, the bailing of scrap; and support activities using on-site equipment to mechanically sort and reduce the size of scrap metals for repurposing into new metal.

The northern portion of the facility located at 1431 East Avenue, Erie, PA is a nonferrous warehouse. The storage of material and all processing occurs indoors at this location. There are no industrial outfalls or exposures located at this portion of the facility.

The southern portion of the facility is located at 1515 East Avenue, Erie, PA. This portion of the facility is comprised of various parcels, rights-of-way, and easements; it houses a warehouse, a vehicle maintenance shop, an office area, a shredder, several pieces of heavy equipment, and outdoor storage for primarily ferrous metals. The facility is surrounded by earthen berms around the perimeter to contain stormwater and contains several areas of concrete and other impermeable surfaces for pollution protection. The two industrial outfalls as identified in the NOI can be found on this portion of the facility. There are several dedicated containment areas that discharge to an oil water separator for pre-treatment prior to discharge at one of two Industrial outfalls. There are three oil water separators located at the southern portion of the facility.

II. Facility Activity

As part of the inspection process, the EPA Inspection Team visually observed the facility conditions in the presence of the facility representatives. The primary purpose of the inspection was to assist EPA in assessing the facility's compliance with Permit requirements.

The observations from the inspection are described in detail below in the Observations section. Photographs were taken during the inspection by Dominic Cotton of EPA, and are provided in Attachment B, Photograph Log. Documents used to support the observations in this report are included in Attachment C, Exhibit Log.

The EPA Inspection Team began the walk-through at the southern portion of the facility located at 1515 East Ave. Areas viewed during the facility walk include:

- Truck Intake Area, including truck scale
- Inactive shredder
- Scrap Metal storage
- Obsolete Oversized Scrap Area
- Above-ground storage tanks
- Rail scale
- Old Outfall 003
- Old Outfall 001
- Outfall 002
- Outfall 001

The southern portion of the facility contains an office building, inactive warehouse, an inactive shredding area, rail house, and maintenance garage.

The EPA Inspection Team observed piles of hauled in scrap, separated based on type, stored throughout the facility that were awaiting processing (e.g., torching). There is one unnamed inlet located centrally to the scrap metal piles that leads to Outfall 002 (Attachment B, Photograph 007). This section of the facility also had a 700 -gallon double- walled propane tank (Attachment B, Photographs 017 and 018).

The EPA Inspection Team observed the location of old Outfall 003 (Attachment B, Photograph 012). This outfall was removed by the facility and is currently closed with an earthen berm. Old Outfall 001 was also observed on the southern portion of the facility. This outfall once received runoff from the Bayfront Connector, a highway above, but is now capped by the facility (Attachment B, Photograph 044).

The EPA Inspection Team observed the area where “wet” steel turnings are kept under cover (Attachment B, Photographs 019 through 021). Steel turnings housed here were coated in cutting fluid or oil during processing. Flow from this area discharges to an inlet that leads to Outfall 002. Outside of the steel turnings storage area is the Rail Scale, where rail cars are weighed after loading for haul out. Any excess stormwater that collects in this area is also pumped out toward Outfall 002 (Attachment B, Photographs 022 through 025).

All inlets at the facility are protected using drop inlet filters. The facility has two outfalls located on the southern portion of the facility. Outfall 001 collects stormwater from the turnings containment area, and is treated through an oil water separator prior to discharge. Outfall 002 is a manhole containing inlets from two oil water separators throughout the facility. Discharge from Outfall 002 discharges into the Hydraulic Canal before comingling with Outfall 001 (Attachment B, Photographs 027 through 029). All discharges onsite eventually lead to Outfall 001 which directly discharges to Garrison Run (Attachment B, Photographs 030 through 033).

The EPA Inspection Team also conducted a walk-through of the northern portion of the facility located at 1431 East Ave, an indoor nonferrous warehouse. “Peddlers” or public entities bring their scrap metal to the warehouse for sale as well. The storage of material and all processing occurs indoors at this location. The warehouse is used for metal and liquid storage as it contains several above ground storage tanks (Attachment B, Photographs 045 through 055).

II.Observations

The following section summarizes the EPA Inspection Team’s observations relative to the facility’s permit requirements, including the status of certain treatment units, operation and maintenance practices, and the facility’s monitoring and reporting documentation.

BMPs for Scrap and Waste Recycling Facilities (Non-Source Separated, Non-Liquid Recyclable Materials)

Appendix P, Part III.A of the permit states, “The following requirements are for facilities that receive, process, and conduct wholesale distribution of non-source separated, non-liquid recyclable wastes (e.g., ferrous and nonferrous metals, plastics, glass, cardboard, and paper). These facilities may receive both non-recyclable and recyclable materials. This section is not intended for those facilities that accept recyclables only from primarily non-industrial and residential sources...

Scrap and Waste Material Stockpiles and Storage (Outdoor):

Minimize contact of stormwater runoff with stockpiled materials, processed materials, and non-recyclable wastes through implementation of control measures including but not limited to the following: permanent or semi-permanent covers; sediment traps, vegetated swales and strips, catch basin filters, and sand filters to facilitate settling or filtering of pollutants; dikes, berms, containment trenches, culverts, and surface grading to divert runoff from storage areas; silt fencing; and oil and water separators, sumps, and dry absorbents for areas where potential sources of residual fluids are stockpiled (e.g., automobile engine storage areas).

Stockpiling of Turnings Exposed to Cutting Fluids (Outdoor Storage):

Minimize contact of surface runoff with residual cutting fluids by storing all turnings exposed to cutting fluids under some form of permanent or semi-permanent cover, or establishing dedicated containment areas for all turnings that have been exposed to cutting fluids. Any containment areas must be constructed of concrete, asphalt, or other equivalent types of impermeable material and include a barrier (e.g., berms, curbing, elevated pads) to prevent contact with stormwater run-on. Stormwater runoff from these areas can be discharged, provided that any runoff is first collected and treated by an oil/water separator or its equivalent. The permittee must regularly maintain the oil/water separator (or its equivalent) and properly dispose of or recycle collected residual fluids...

Observation 1: The EPA Inspection Team observed a temporary outdoor metals storage area behind the warehouse on the southern portion of the facility. Shredder machine spare parts were stored outside (refer to Attachment B, Photograph 003).

Observation 2: An oil sheen was observed in cloudy stormwater near the “Obsolete Oversized Scrap Area” (refer to Attachment B, Photograph 013 through 016).

Observation 3: The EPA Inspection Team observed a milk – colored discharge leading directly to an inlet outside of the wet steel turnings pile (refer to Attachment B, Photographs 019 through 021). Facility representatives stated that stormwater goes through an oil water separator before discharge to Garrison Run.

Good Housekeeping

Part C.II.C. of the permit states, “The permittee shall perform good housekeeping measures in order to minimize pollutant discharges including the routine implementation of the following measures, at a minimum:

1. Implement a routine cleaning and maintenance program for all impervious areas of the facility where particulate matter, dust or debris may accumulate to minimize the discharge of pollutants in stormwater. The cleaning and maintenance program must encompass, as appropriate, areas where material loading and unloading, storage, handling and processing occur...”

Observation 4: At the time of the inspection, cloudy stormwater was observed on East Ave before discharging to an inlet that leads to Outfall 001 (refer to Attachment B, Photographs 035 and 036).

Spill Prevention and Responses

Part C.II.E. of the permit states, “The permittee shall minimize the potential for leaks, spills and other releases that may be exposed to stormwater and develop a plan consistent with Part C IV for effective responses to such releases. The permittee shall conduct the following spill prevention and response measures, at a minimum:

Maintain an organized inventory of materials on-site. Plainly label containers (e.g., “Used Oil,” “Spent Solvents,” “Fertilizers and Pesticides”) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur.

...Keep spill kits on-site, located near where spills may occur or where a rapid response can be made.

...Clean up leaks, drips, and other spills without using large amounts of water or liquid cleaners. Use absorbents for dry cleanup whenever possible.”

Observation 5: The EPA Inspection Team observed several oil stains within the maintenance garage (refer to Attachment B, Photographs 038 through 040). Liquid was observed to be actively leaking from heavy machinery within the maintenance garage (refer to Attachment B, Photograph 041).

Observation 6: At the time of the inspection, the spill kit next to the 450 – gallon diesel tank was empty in warehouse on the northern portion of the property (refer to Attachment B, Photographs 048 and 049).

Observation 7: The EPA Inspection Team observed several unlabeled 55- gallon drums in the warehouse on the northern portion of the property (refer to Attachment B, Photograph 054). The drums were on spill containment pallets.

Observation 8: The EPA Inspection Team observed 2 unlabeled storage tanks within secondary containment in the warehouse on the northern portion of the property. According to the site map, they are 275- gallon hydraulic oil tanks. One of the tanks appeared to be leaking at the time of the inspection, as there was staining and absorbent material below the tanks (refer to Attachment B, Photographs 055 through 057).

IV. Records Review

The EPA Inspection Team reviewed documentation including: the SWPPP, Scrap Acceptance Agreement, Inbound Material Inspection Form, Self- Inspection Reports, 2022 Annual Report, 2023 Training Log and Oil Water Separator Cleanout and Inlet Protection Records received on May 5, 2023. The EPA Inspection Team also reviewed correspondence about site improvements, and reparative measures taken following the inspection.

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 1:00 PM.

VI. List of Attachments

Attachment A: Permit No. PAR608311 A-2

Attachment B: Photograph Log

Attachment C: Exhibit Log

Exhibit 1: SWPPP

Exhibit 2: AIM Scrap Acceptance Agreement

Exhibit 3: Inbound Material Inspection Form

Exhibit 4: Self-Inspection Reports 2023

Exhibit 5: 2023 Training Log

Exhibit 6: OWS Cleanout and Inlet Protection Records

Exhibit 7: Correspondence on Site Improvements