

U.S. Environmental Protection Agency, Region 4
61 Forsyth Street SW, Atlanta, GA 30303
Water Compliance Inspection Report

FACILITY DATA

NPDES ID: GAIS12513 **Effective Date:** 06/01/2022 **Expiration Date:** 05/31/2027
Facility Name: Radius Recycling (AKA SCHNITZER SOUTHEAST, LLC) **SIC Code:** 5093-01
Address: 950 Lower Popular Road, Macon, GA 31201

On-Site Representatives: Walter Massey, General Manager T: 478-746-6773 E: wmassey@schn.com Mike Hollingsworth, Recycling Operations Director T: 404-332-1710 E: mhollingsworth@schn.com	Responsible Official: Mark Hall, Regional Environmental Manager T: 205-359-4248 E: cmhall@rdus.com Off-Site Representative: Danielle Owens, Environmental Manager T: 470-971-9578 E: dowens@rdus.com
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INSPECTION ENTRY DATES/TIMES

Entry Date/Time: 10:00 AM / 08-14-2024 **Exit Date/Time:** 12:50 PM / 08-14-2024

NAMES OF STATE INSPECTORS

GA EPD: Anam Mustafa, Adefola Olateru, Michael Messinger

AREAS EVALUATED DURING INSPECTION (Check those areas evaluated)

X	Permit		Self-Compliance Program		Pretreatment
X	Records		Compliance Schedule	X	Pollution Prevention
X	Facility Site Review		Laboratory	X	Storm Water
X	Effluent/ Receiving Waters	X	Operations & Maintenance		Combined Sewer Overflow
	Flow Measurement		Sludge Handling/ Disposal		Sanitary Sewer Overflow

INSPECTION SUMMARY

The inspection included both a review of records and documents as well as a site walk around the facility. An inspection of Pond 1 and Pond 2 as well as a drainage ditch leading to Pond 2 were conducted. Eighteen (18) photos were taken during the inspection, but due to operator error only ten (10) photos were obtained. The same eighteen (18) photos were also taken by Mike Hollingsworth on behalf of Radius Recycling, Inc.

INSPECTOR SIGNATURE

OFFICE/PHONE NUMBER

	USEPA Region 4/ECAD-WEB-WWES 404-562-9804
Celina Russo, Environmental Engineer	
	USEPA Region 4/ECAD-WEB-WWES 404-562-9505
Jeremy Judd, Environmental Engineer	
	USEPA Region 4/ECAD-WEB-WWES 404-562-9212
Ahmad Dromgoole, Section Chief Waterways and Wetlands Enforcement Section	

Sector N: NPDES Industrial Stormwater Worksheet (Georgia)

1. FACILITY LOCATION INFORMATION

GPS Coordinates	Latitude	32.824429 N	Longitude	-83.610265 W	
Receiving Water(s) or MS4	UT of Ocmulgee River		Discharge to 303(d) or TMDL waters	No	
Site Acreage	approximately 37 acres	SIC Code	5093-01	Weather Condition	Sunny, warm
Date of NOI	06/21/2022	Email on NOI	Walter Bentley wbentley@schn.com		

2. STORMWATER POLLUTION PREVENTION PLAN (SWPPP) AND SUPPORTING DOCUMENTS

PLAN TOPICS – Section 5 of Permit	YES	NO	N/E
SWPPP available on-site Part 5.3/7.6 <i>The onsite SWPPP was dated August 2022 and prepared for Schnitzer Southeast, LLC (the previous name of the company currently known as Radius Recycling). Inspectors requested that an electronic copy be submitted via email. An electronic copy, also dated August 2022, was received via email on 08/14/2024. A newer version of the SWPPP, dated October 24, 2023, was submitted via email on September 9, 2024. The 2023 version was prepared for Radius Recycling.</i>	X		
SWPPP Certification Signature/Date Part 5.1.7 / Appendix B <i>Neither the electronic nor hard copy was signed by Facility personnel.</i>		X	
SWPPP modified and updated to current conditions Part 5.2.1-2 <i>In accordance with Parts 3.1, 3.2, 4.3.2e and 5.2 of the General Permit, the SWPPP will be modified within 30 calendar days of the following types of occurrences or changes at the facility:</i> <i>knowledge of a release equal to or in excess of a reportable quantity under the Georgia Oil or Hazardous Materials Spills or Releases Act (O.C.G.A 12-14-2), 40 CFR 110.6, 40 CFR 117 or 40 CFR 302, to prevent the reoccurrence of such release and to respond to such releases;</i> <i>existing control measures are not stringent enough to sufficiently minimize pollutants in stormwater discharges to ensure that the receiving waterbody does not exceed applicable water quality standards as a result of the discharges;</i> <i>an inspection by a state or local agency determines that modifications to the control measures are necessary to meet non-numeric effluent limits;</i> <i>it is determined during a quarterly Routine Facility Inspection, Quarterly Visual Stormwater Discharge Assessment, or annual Comprehensive Facility Inspection that control measures are not being properly maintained or operated;</i> <i>construction or a change in design, operation, or maintenance at the facility, which has a significant effect on nature of pollutants discharged in stormwater from the facility or significantly increases the quantity of pollutants discharged; or</i>	X		

annual sampling results exceed an applicable benchmark.			
Pollution Prevention Team named in SWPPP Part 5.1.1 <i>SWPPP Section 3.1 does not identify the name and contact information of each member on the pollution prevention team. SWPPP states that the pollution prevention team is to consist of the General Manager, Yard Supervisor, and Regional Environmental Manager. SWPPP responsibilities for those in each of these positions are identified.</i>	X		
Employee training schedule Part 5.1.2.2 <i>In accordance with the requirements of Parts 5.1.2 and 5.1.6.1 of the General Permit, training will be conducted for all employees who work in areas where industrial materials or activities are exposed to stormwater, or who are responsible for implementing activities necessary to meet the conditions of this permit, including all members of the Pollution Prevention Team. Training will be conducted as soon as practicable after hiring and then annually for existing employees.</i> <i>At the time of the inspection, training records and documentation was validated.</i>	X		
Site Description Part 5.1.3 <i>The major operations at this metal recycling facility include the following: 1) purchasing, receiving, and off-loading ferrous and non-ferrous metals, paper, cardboard and plastic materials; 2) sorting ferrous and non-ferrous metallic materials; 3) baling metallic, paper, cardboard and plastic materials; 4) machinery; and 5) shipping sorted and baled material.</i>	X		
Site Map Part 5.1.3.3 <i>In accordance with Part 5.1.3 of the General Permit, a general location map of the Schnitzer facility in Macon, Georgia, and the stormwater discharge receiving stream are presented on Figure 1 in Appendix A of this SWP3. In accordance with Part 5.1.3 of the General Permit, a site map is presented as Figure 2 in Appendix A.</i> <i>At the time of the inspection, the site map was validated to be current.</i>	X		
Summary of potential pollutant sources and particular pollutants Part 5.1.4 <i>Potential pollutant sources include the following:</i> - diesel fuel, hydraulic oil, motor oil, and used oil from petroleum bulk storage containers (which are typically stored under roof); - equipment fueling area adjacent to bulk storage containers; - engine blocks area; - metal handling equipment; and scrap metal piles.	X		
Description of the Control Measures Part 5.1.5 <i>Identified control measures include the two (2) stormwater detention ponds, multiple oil water separators, and a grassed swale.</i>	X		
Schedule and Procedures for Good Housekeeping Part 2.1.2.2, 5.1.6.1a <i>In accordance with Part 2.1.2.2 of the General Permit, good housekeeping practices will be implemented at this facility and will serve to minimize the exposure of potential contaminants to storm water. The procedures listed below will be implemented and maintained:</i> - Containers, drums, and bags will be stored away from direct traffic routes to prevent accidental spills. Containers will be stacked according to manufacturers' instructions to avoid damaging containers from improper weight distribution. Where practical, containers will be stored on pallets, or similar structures, to prevent container corrosion due to ground moisture. All containers will be labeled to show the name and type of substance. Material Safety Data Sheets (MSDSs) will be readily available for chemical substances that may be exposed to storm water. - Petroleum products and petroleum wastes will be stored in DOT-approved steel drums with lids securely fastened and all other openings completely sealed. Drums that must be stored	X		

outdoors will be placed either on a paved area, or on wooden pallets to minimize the potential for drum corrosion and allow easy inspection for leaks. All drums stored outdoors will have the secure lid and bungs. - Prior to storage outdoors, scrap containing oil and out-of-service parts will have fluids (e.g., motor, transmission and hydraulic oils, coolants, fuels) drained and properly disposed. Batteries will be removed from scrap machinery and stored indoors prior to reuse or disposal. - All trash will be removed regularly from the facility. No specific schedule was provided.			
Schedule and Procedures for Preventative Maintenance Part 5.1.6.1 Schnitzer will also maintain in effective condition all control measures that are used to achieve the effluent limits required by the General Permit. The following procedures are implemented and maintained: - Preventive maintenance will be conducted on motors, pumps, fans and blowers to minimize the potential for leaks from failed seals or equipment. Seals and gaskets will be maintained and/or replaced in accordance with manufacturers' specifications. - Operating equipment will be regularly inspected, and any leaking or malfunctioning equipment will be repaired or taken out of service. - Vehicles will be inspected by the driver on a regular basis to detect fluid leaks. Leaking vehicles will be repaired. - Secondary containment systems will be cleaned and repaired as necessary to maintain integrity and minimize the potential for leakage.	X		
Contains Spill Prevention and Response Procedure Part 5.1.6.1.c Section 5.5 of the SWPPP details the Facility's spill control procedures.	X		
Schedule & Procedures for Monitoring Part 5.1.6.2 Section 6.0 of the SWPPP details the Facility's schedule and procedures for monitoring.	X		
Schedule & Procedures for <u>ROUTINE</u> Inspections Part 5.1.6.2.d.i Inspections of all industrial areas of the Facility that are exposed to stormwater are to be inspected at least quarterly. At least once per year, one of these inspections shall be done while a stormwater discharge is occurring.	X		
Schedule & Procedures for <u>QUARTERLY VISUAL</u> Inspections Part 5.1.6.2.d.ii, 4.2 In accordance with Parts 4.1.1 and 5.1.6.2 of the General Permit, the facility conducts quarterly Routine Facility Inspections (RFIs) of all areas where industrial materials or activities are exposed to stormwater and of all stormwater control measures used to comply with effluents limits. On a quarterly basis each calendar quarter, or more frequently if needed, a Pollution Prevention Team member conducts the RFI to identify conditions that may contaminate stormwater runoff.	X		
Schedule & Procedures for <u>ANNUAL COMPREHENSIVE</u> Inspections Part 5.1.6.2.d.iii, 4.3 The Annual Non-Stormwater Discharge Evaluation is performed by the Pollution Prevention Team Leader or their designee once each calendar year for the duration of the General Permit to verify the continued absence of non-stormwater discharges other than the allowable non-stormwater discharges identified in Section 4.4 of the SWPPP.	X		

3. SITE DESCRIPTION AND SWPPP

Facility was permitted as Schnitzer Southeast, LLC (GAIS12513), but was renamed to Radius Recycling during the Fiscal Year of 2023. Facility is in the scrap and waste metals industry.

Major operations at this metal recycling facility include the following: 1) purchasing, receiving, and off-loading ferrous and non-ferrous metals, paper, cardboard and plastic materials; 2) sorting ferrous and non-ferrous metallic materials; 3) baling metallic, paper, cardboard and plastic materials; 4) machinery; and 5) shipping sorted and baled material.

This site is in a basin formed by a levee next to the Ocmulgee River. All runoff from the site drains to the two retention ponds located in the southeastern corner of the property. These two ponds are connected such that they discharge through the same outlet structure at Outfall 001 towards the railroad tracks. According to Facility personnel, the upper pond was added about 2-3 years ago. Facility reports no discharges during the previous permit term, due to the size and retention capacity of the pond system. Both ponds were dry during the inspection.

4. RECORD REVIEW

	YES	NO	N/E
Representative on-site	X		
NOI Submitted to EPD Part 5.4.1 Facility was permitted as Schnitzer Southeast, LLC under the 2022 General Permit. Due to a change in company name in 2023 (rebranded name is now Radius Recycling), a modified NOI may need to be submitted to EPD. The date of the current NOI submitted by Schnitzer Southeast, LLC is 06/21/2022. According to a letter from the Facility dated September 09, 2024, Facility has since initiated the NOI modification process.		X	
Records available onsite or "readily available" Part 5.4 A physical copy of the SWPPP was onsite, and an electronic copy of the SWPPP was submitted to inspectors on 08/14/2024 via email. The newest version of the SWPPP was provided on 09/09/2024.	X		
Records of incidents with spills, leaks, pollutant releases Part 5.4.3	X		
Records of maintenance and repairs of control measures Part 5.4.4	X		
Records of employee training Part 5.4.11	X		
Records of <u>ROUTINE</u> quarterly inspections Part 4.1/5.4.5	X		
Records of <u>QUARTERLY VISUAL</u> inspection of sw discharge Part 4.2.1.2 (Collected in first 30 min of discharge; 0.1-inch storm; 72 hrs min from last rain)	X		
Records of <u>ANNUAL</u> Comprehensive inspections Part 4.3/5.4.5	X		
Records of Benchmark Monitoring (annual unless exceeded) Part 6.1.3-4/8			X
Representative Sampling App B.14.1 Samples are collected at the pond outlets.			X
Non-stormwater certification onsite? Part 5.1.4.4			X

(once/five years comprehensive e.g., dye/smoke testing)				
Impaired Stream Segment Sampling and Requirements? <i>Not applicable.</i>	Appendix C			X
Annual Reporting of Monitoring Data to EPD	Part 7.1	X		
Indicator Monitoring	Part 8.N.7			X
SPCC? <i>The facility had developed a SPCC plan.</i>		X		

5. FIELD EVALUATION & PLAN IMPLEMENTATION	
Pollutant Sources	Note location, quantitative description, design issue, O&M deficiencies, and pollutants offsite
Loading/Unloading Area	<i>Incoming metals, which the Facility purchases from either industrial customers or the public, typically arrive via truck and are first evaluated at the scale house under the Facility's Inbound Material Control program.</i> <i>Industrial materials and material handling areas include the following:</i> • <i>diesel fuel, hydraulic oil, motor oil, and used oil from petroleum bulk storage containers (which are typically stored under roof);</i> • <i>equipment fueling area adjacent to bulk storage containers;</i> • <i>engine blocks area;</i> • <i>metal handling equipment; and</i> • <i>scrap metal piles.</i>
Outdoor Storage	<i>Photo DSCN3023 indicates the designated area for used oil storage, which is located under cover.</i> <i>Photo DSCN3024 indicates the designated area for material separation for the finished goods that are ready to ship.</i> <i>Photo DSCN3028 indicates the designated area for steel turnings storage with the intent of the facility to sell the product.</i>
Outdoor Manufacturing/Processing Operations	<i>Outdoor processes include torching, shearing, and baling. Facility processes some automobiles (approximately 6 per month). Batteries are removed and fluids are drained under cover at the wet rack and car staging area.</i> <i>Major operations at this metal recycling facility include the following: 1) purchasing, receiving, and off-loading ferrous and non-ferrous metals, paper, cardboard and plastic materials; 2) sorting ferrous and non-ferrous metallic materials; 3) baling metallic, paper, cardboard and plastic materials; 4) machinery; and 5) shipping sorted and baled material.</i>
Treatment/Storage/Disposal Areas	<i>Photo DSCN3025 indicates the maintenance area for processing wet car drainage.</i>
Sediment & Erosion Controls (BMPs)	<i>The facility needs to implement sediment controls for dust suppression on the unpaved roads located at the facility.</i> <i>The facility needs to implement sediment and erosion controls for the drainage ditch located in the middle of the facility near BLDG – Shop Maintenance.</i>

**Spills / Leaks Handling /
Good Housekeeping**

The facility needs to conduct good housekeeping and cleanup at the stormwater inlet located near and in front of the main office building.

The facility needs to implement best management practice (BMP) control device at the stormwater inlet located near and in front of the main office building. Since this storm drain inlet is located in a frequently trafficked roadway, Facility has instead been removing sediment at the drain's outlet (system outlets into the conveyance at the front of the property that discharges into the upper pond. Accumulated sediment is cleaned and removed as needed, which is approximately annually. The oil-water separators are cleaned approximately once per quarter and maintenance records are maintained onsite. Unpaved parts of the yard are re-graded about once per quarter; moved dirt is added to the stockpile in the yard for later screening. Facility's vehicle wash station is under cover near the maintenance shop. Wash water is captured by a trench drain and conveyed to an oil water separator. The mobile fuel tank is stored here when not in use. The fuel bay is located near the maintenance shop. Some used motor oil is also stored in secondary containment inside the shop.

6. OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS

OUTFALLS, STORMWATER DISCHARGE, RECEIVING WATER	YES	NO	DESCRIPTION
Number & location of stormwater discharge(s)/outfall(s) consistent with SWPPP	X		One outfall at the ponds' overflow/outlet structure, which is consistent with the location described in the NOI and SWPPP. the two drainage basins described in Section 4.1 of the SWPPP are visually inspected for evidence of non-storm water discharges.
Evidence of off-site accumulation of pollutants observed in receiving water		X	None observed.
Non-stormwater discharge observed		X	None observed.

Exit interview conducted with: *Walter Massey and Mike Hollingsworth, and Danielle Owens and Mark Hall via telephone conference.*

Preliminary findings discussed during the exit interview included:

- *Because of the new company name, the Facility may need to coordinate with GA EPD to modify/update their NOI.*
- *Storm drain inlets required both maintenance and good housekeeping as well as best management practices (BMPs) protection to be installed and maintained.*

On September 9, 2024 inspectors received a letter from the Facility responding to comments discussed during the closing conference. Facility has since initiated the NOI submittal process, cleaned up sediment, and installed sediment booms at the outlet of the drainage system to control sediment reaching the pond system. Photos were also provided as well as a copy of a newer version of the SWPPP (dated 2023 and prepared for Radius Recycling).

Photo Log is attached.