

UNPERMITTED INDUSTRIAL FACILITY STORMWATER INSPECTION CHECKLIST

Inspection Date	February 27, 2024	
Time	Entry: 10:27 AM	Exit: 11:45 AM
Weather Conditions	60's and sunny	
Media/Program	Water – CWA § 301, 402 – Industrial SW/NEC	
Operator Name:	Trademark Metals Recycling	
Facility or Site Name:	Trademark Metals Recycling – Miami Shredder	
Permit ID or Tracking #:	Miami-Dade Class VI Permit – CLVI-20180023	
SIC Code:	5093*	
Facility Address:	3440 NW 135th Street	
(city, state, zip code)	Opa Locka, FL 33054	
Geographic Coordinates:	25.895818°, -80.256770°	
Mailing address:	3440 NW 135th Street	
(city, state, zip code)	Opa Locka, FL 33054	
County:	Miami-Dade	
Regular Days/Hours of Operation:	7:00 AM – 4:30 PM (M – F); 7:00 AM – 12:00 PM (Sat); Closed (Sun)	
# of Employees at location:	16	
Size of Facility (in acres):	7.5 acres in total with approximately 6.3 acres of outdoor activity	
Receiving Water(s):	Opa Locka Canal, approximately 300' north of the facility	
Date facility est. @ location:	2005	
Onsite Representatives:		
Name: Sixto Chavez	Title: Facility Manager	Phone: 813-469-1864
	Email: sean.peloquin@tmrecycling.com	
Authorized Official:	→ Contacted? ☒ Yes ☐ No	
Name: Joe Stalker	Title: Environmental Manager	Phone: 813-394-9919
	Email: joe.stalker@tmrecycling.com	
Additional Personnel Participating in Inspection:		
Name:	Title:	
Mark Bianculli	Regional Manager	
Sean Peloquin	Facility Manager – Opa Locka yard	
Inspector(s):	Title:	Company:
Kate Forsmark	Lead Inspector	Eastern Research Group, Inc.
Kelsey Guy	Inspector	Eastern Research Group, Inc.
Rachel Olugbemi	Inspector	Environmental Protection Agency, Headquarters
Jeremy Judd	Inspector	Environmental Protection Agency, Region 4
Inspection Report Author:		
Name: Kate Forsmark	Signature: 	Date: March 22, 2024

SECTION I – INTRODUCTION

Purpose of the Inspection

The purpose of the inspection was to determine compliance with the industrial stormwater requirements under §§ 301 and 402(p) of the CWA and its implementing regulations found at 40 CFR Part 122.26. The inspection was unannounced and consisted of interviewing facility representatives, recording field observations, and taking photographs to document site conditions throughout the facility at the time of the inspection.

Opening Conference

- 1) Brief narrative documenting those present, introductions, presentation of credentials, and explanation of the purpose of the inspection.

On February 27, 2024, a U.S. Environmental Protection Agency (EPA) contractor, Eastern Research Group, Inc. (ERG), conducted an industrial stormwater non-filer inspection at Trademark Metals Recycling – Miami Shredder located in Opa Locka Florida (facility). Rachel Olugbemi of EPA Headquarters, Jeremy Judd of EPA Region 4, and Kate Forsmark and Kelsey Guy of ERG (collectively, EPA Inspection Team) met with the Facility representatives Sixto Chavez, Joe Stalker, and Mark Bianculli. The EPA Inspection Team presented their credentials and explained that it was EPA's understanding that the facility did not have an industrial stormwater permit. The EPA Inspection Team explained they were onsite to conduct a Clean Water Act stormwater inspection which includes observing the current operations of the facility and assessing the potential for stormwater discharges from the facility.

The weather at the time of the inspection was sunny and approximately 64°F. According to precipitation data from the National Oceanic and Atmospheric Administration (NOAA)¹, the Opa Locka, Florida area received no rain the day of or the day prior to the inspection.

- 2) Credentials presented to: Sixto Chavez and Joe Stalker
- 3) Facility acknowledged receiving previous outreach materials or correspondence on Permit requirements?
☐ Yes ☒ No Describe: N/A
- 4) Facility has been individually notified by permit authority or EPA that it is subject to stormwater requirements?
☒ Yes ☐ No Describe:

The facility is aware of industrial stormwater permitting requirements for all of Trademark Metals Recycling's other Florida facilities, which are located outside of Miami-Dade County and have industrial stormwater permits. Miami-Dade County restricts metals recycling facilities under SIC Code 5093 from discharging stormwater. Due to this restriction, the facility directs stormwater to a facility-owned dry infiltration pond for groundwater infiltration, permitted under a Class VI Permit# CLVI-20180023 through Miami-Dade County's Municipal Code Section 24-47, effective since July 16, 2019.

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

FACILITY'S OPERATION & PRODUCT DESCRIPTION

***Description of business and industrial activities occurring throughout the site. (Include operator's description and note any documentation that further establishes SIC code (permit applications, reports, business registries, website...)).**

The facility is a shredder yard that recycles scrap metals. Ferrous metals are only received from commercial sources or transferred from the Trademark Metals Recycling – Opa Locka facility (the Opa Locka facility) across Cairo Lane and are shredded onsite at the facility. Loads are inspected before they are accepted, and any hazardous materials are rejected. Once the facility processes materials through shredding, the materials are sent out for recycling via rail car or into export containers for shipment on trucks.

Other industrial facilities owned/operated by same business entity? ☒ Yes ☐ No Describe:

Trademark Metals Recycling has 22 metals recycling facilities throughout Florida.

SECTION II – OBSERVATIONS

SITE EVALUATION

Pollutant Sources	Note location, quantity/size, design issues, any O&M deficiencies (including the nature and extent), potential pollutants, and evidence of exposure to stormwater. Are BMPs in place to minimize or eliminate stormwater discharges from industrial activities?
Loading/Unloading Operations	The facility unloads materials from commercial sources for processing in a central location. Once processed, the materials are loaded into trucks to get loaded into rail cars located at the Opa Locka facility.
Industrial Manufacturing/Processing Operations	The facility processes ferrous scrap metals for recycling. The ferrous metals are put through a shredder and packaged for delivery to a smelting facility.
Industrial Machinery & Equipment Storage	The facility has two loaders, three materials handlers, and multiple forklifts and skid steers for moving materials around the facility. Equipment is located throughout the facility. The shredder is located in the southern portion.
Storage of Industrial Materials or Products	The facility stores ferrous scrap metals throughout the property. Materials are stored in uncovered piles around the yard and exposed to stormwater.
Liquid Storage (e.g., Tanks, Liquid Storage Drums)	The facility stores diesel fuel and hydraulic oil onsite, under cover and in secondary containment for fueling and maintaining equipment.

Pollutant Sources	Note location, quantity/size, design issues, any O&M deficiencies (including the nature and extent), potential pollutants, and evidence of exposure to stormwater. Are BMPs in place to minimize or eliminate stormwater discharges from industrial activities?
Waste Storage/Disposal Areas (solid and/or hazardous)	The facility has solid waste dumpsters for general solid waste.
Waste Treatment Facilities (e.g., Pretreatment Systems)	Not observed or reported at the facility.
Fueling Stations/Equipment Maintenance Areas & Cleaning Areas	The EPA Inspection Team observed fuel stored under cover on the western perimeter of the facility. Per the facility's SPCC plan, the gasoline tank is double walled, and the other tanks are contained within secondary containment. Equipment is maintained under cover inside the maintenance warehouse. Larger equipment (i.e., excavators and materials handlers) is fueled and maintained where the equipment is located.
Sediment & Erosion Controls	The EPA Inspection Team observed that the ground surface throughout the facility is paved, except for the southern entrance/exist onto Cairo Lane (refer to <u>Appendix B, Photograph 1</u>). The facility is swept weekly using a street sweeper. The facility is sprayed daily to control dust using a water truck. Drains are cleaned regularly using a vacuum truck.
Spills/Leaks Handling	The facility maintains spill kits with all of their tanks.
Outside Shelters	☐ Temporary (Date Established _____) ☐ Permanent Not observed or reported at the facility.
Evidence of non-stormwater sources/discharges (allowable if permitted under MSGP)?	Evidence of non-stormwater sources/discharges was not observed during the inspection.
Evidence of process wastewater sources/discharges?	None observed.

OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS

Number and description of each potential Stormwater Discharge Point from the Facility	In accordance with Miami-Dade County requirements, stormwater discharges are not allowed from industrial facilities under SIC Code 5093. The facility maintains a Class VI permit with the county which is needed for the “installation of a drainage system for any project that has known soil or groundwater contamination; or that uses, generates, handles, disposes of, discharges, or stores hazardous materials.” As such, the facility directs stormwater to a facility-owned dry retention basin. (refer to <u>Appendix B, Photographs 3 through 7 and 9</u>).
Evidence of pollutants migrating offsite (stains, deposits, ponding) at discharge points, into receiving waters or in MS4	The southern entrance/exit onto Cairo Lane is unpaved and the EPA Inspection Team observed sediment track-out onto the roadway (refer to <u>Appendix B, Photograph 1</u>).
Evidence of Non-stormwater Discharges leaving site (authorized or unauthorized)	None observed.
Description of general gradients/slopes onsite, all apparent discharge points, and discharge pathway from Facility to Receiving Water or MS4 (storm drains, channel, swale, ditches, driveway, pipes, & etc.)	The EPA Inspection Team observed the facility to be graded inward from the perimeters, directing stormwater to onsite storm drains. Storm drains in the southeast portion of the facility direct stormwater to a 250,000-gallon tank where water is used as cooling water for the shredder system. Storm drains in the northern entrance/exit onto 135th street and central portion of the facility are connected to exfiltration trenches where stormwater is filtered prior to infiltration into the groundwater as recharge (refer to <u>Appendix B, Photographs 6, 7, and 9</u>). Exfiltration trenches are subsurface infiltration pipes or tanks designed to store and infiltrate stormwater. The exfiltration trenches are located centrally at the facility. Stormwater in the northwestern portion of the facility is pumped into a sump (refer to <u>Appendix B, Photographs 3 through 5</u>), then across Cairo Lane, and into the Trademark Materials Recycling - Opa Locka facility’s Sunshine Pond. Sunshine Pond has dry wells for groundwater infiltration and is designed with a capacity for a 100-year storm.

SECTION III – AREAS OF CONCERN

1) The southern entrance/exit onto Cairo Lane is unpaved and the EPA Inspection Team observed sediment track-out onto the roadway (refer to Appendix B, Photograph 1).

SECTION IV – LIST OF APPENDICES

All photos taken by Kelsey Guy, ERG, unless otherwise noted

Appendix A – Aerial Location

Appendix B – Photograph Log

Appendix C – Facility Submissions