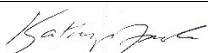


UNPERMITTED INDUSTRIAL FACILITY STORMWATER INSPECTION CHECKLIST

Inspection Date	February 27, 2024	
Time	Entry: 8:50 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 – Opa Locka	
Permit ID or Tracking #:	Miami-Dade Class VI permit: 20110016	
SIC Code:	5093*	
Facility Address:	13200 Cairo Lane	
(city, state, zip code)	Opa Locka, FL 33054	
Geographic Coordinates:	25.893965°, -80.258419°	
Mailing address:	13200 Cairo Lane	
(city, state, zip code)	Opa Locka, FL 33054	
County:	Miami-Dade	
Regular Days/Hours of Operation:	8:00 AM – 4:30 PM (M – F); 8:00 AM – 12:00 PM (Sat); Closed (Sun)	
# of Employees at location:	25	
Size of Facility (in acres):	15.6 acres with approximately 15.0 acres of outdoor activity	
Receiving Water(s):	Opa Locka Canal, approximately 500' north of the facility	
Date facility est. @ location:	2005	
Onsite Representatives:		
Name: Sean Peloquin	Title: Facility Manager – Opa Locka	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 Biancullio	Regional Manager	
Sixto Chavez	Facility Manager – Miami Shredder	
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 nonfiler inspection at Trademark Metals Recycling – Opa Locka 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 Sean Peloquin, Joe Stalker, and Mark Biancullio. 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: Sean Peloquin
- 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; their other facilities, all located outside of Miami-Dade County, have industrial stormwater permits. Miami-Dade County restricts metals recycling facilities under SIC code 5093 from discharging stormwater. Due to this restriction, the facility has a system which retains all stormwater onsite for groundwater infiltration, permitted under a Class VI Permit# 20110016 through Miami-Dade County's Municipal Code Section 24-47, effective since January 27, 2012.

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 scrap metals recycling facility. According to Mr. Stalker, the Facility's Standard Industrial Classification (SIC) code is 5093 - Scrap and waste materials. Mr. Stalker is the environmental manager of all Trademark Metals Recycling facilities in Florida. The Opa Locka facility acts as the feeder yard or the entry point for scrap metal to enter the facility's system. The facility accepts scrap metal from both public and commercial sources and accepts both ferrous and non-ferrous metals. Loads are inspected before they are accepted, and any hazardous materials are rejected. Upon receipt, the facility sorts the materials and sends them out for recycling once processed. Processing includes sorting non-metals out, separating ferrous and non-ferrous metals, and shredding or shearing the metals into transportable sizes. Processed ferrous metals leave the facility via rail cars and non-ferrous metals leave the facility via 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 public and commercial sources for processing. Once processed, the metals are either loaded into trucks in a central location at the facility or onto rail cars located on the western perimeter of the facility for removal from the site.
Industrial Manufacturing/Processing Operations	The facility processes ferrous and non-ferrous scrap metals for recycling. Metals are sorted by type using a material handler with a large magnet. Ferrous metals are put through a shredder at the Miami-Shredder location across Cairo Lane and packaged for delivery to a smelting facility. Non-ferrous materials are packaged using a bailer for delivery to a third party. Processing operations occur outside and are exposed to stormwater.
Industrial Machinery & Equipment Storage	The facility has two mobile shears for cutting metals, one bailer, seven materials handlers, and multiple forklifts and skid steers for moving materials around the facility.

Storage of Industrial Materials or Products	The facility stores ferrous and non-ferrous scrap metal 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's solid waste dumpsters for general solid waste were located west of the storage warehouse. The dumpsters were exposed to stormwater.
Waste Treatment Facilities (e.g., Pretreatment Systems)	None observed or reported at the facility.
Fueling Stations/Equipment Maintenance Areas & Cleaning Areas	The facility representative stated that the facility stores diesel fuel and hydraulic oil in a central location at the facility. Per the facility's SPCC plan, the tanks are double walled. The tanks are in the processing area and due to safety concerns, the EPA Inspection Team did not observe the tanks. Equipment is maintained under cover inside the storage warehouse. Larger equipment (i.e., excavators and materials handlers) is fueled and maintained where the equipment is located.
Sediment & Erosion Controls	None observed or reported at the facility; the ground surface throughout the facility is paved.
Spills/Leaks Handling	The facility representative stated they maintain spill kits in the respective fueling areas. Due to the location of the tanks, the EPA Inspection Team did not observe the spill kits for safety reasons.
Outside Shelters	☐ Temporary (Date Established _____) ☐ Permanent None observed or reported at the facility.
Evidence of non-stormwater sources/discharges (allowable if permitted under MSGP)?	The EPA Inspection Team did not observe evidence of non-stormwater sources/discharges.

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 (Section 24-47 of the Code of Miami-Dade County), stormwater discharges are not allowed from industrial facilities under SIC code 5093. The facility maintains a Class VI permit with Miami-Dade County which is required 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” (refer to <u>Appendix C</u>). As such, the facility developed a stormwater management system to retain stormwater at the facility. The EPA Inspection Team observed that facility stormwater is directed to onsite storm drains which drain to Sunshine Pond, an infiltration pond, for retention, evaporation, and groundwater infiltration. The inlets observed in Sunshine Pond are the end points to the underground stormwater conveyance system which collects stormwater throughout the facility. The EPA Inspection Team also observed the perimeters to be the highest points at the facility which facilitates retaining stormwater onsite.
Evidence of pollutants migrating offsite (stains, deposits, ponding) at discharge points, into receiving waters or in MS4	The facility’s southern entrance is partially paved and less graded than the northern entrance. The EPA Inspection Team observed sediment track-out onto Cairo Lane (refer to <u>Appendix B, Photographs 2 through 5</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 all perimeters directing stormwater to one of the onsite storm drains. The onsite storm drains direct stormwater to “Sunshine Pond,” the facility’s onsite infiltration pond (refer to <u>Appendix B, Photographs 6 through 11</u>). Sunshine Pond has inlets for groundwater infiltration and is designed with a capacity for a 100-year storm. Sunshine Pond additionally has trenches that direct stormwater through a sand filter and into the groundwater as recharge. The EPA Inspection Team observed a pipe from the Trademark Metal Recycling facility across the street (i.e., Trademark Metal Recycling – Miami Shredder). Water collects onsite at the Miami Shredder location and is pumped through the pipe to the Opa Locka facility. The facility representatives stated there is no backflow from their Opa Locka facility to their Miami Shredder facility.

SECTION III – AREAS OF CONCERN

- 1) The EPA Inspection Team observed two inlets in the northern portion of Sunshine Pond to be approximately two feet below the ground surface and filled in with dirt, potentially reducing the functionality/capacity of the inlet and stormwater conveyance system (refer to Appendix B, Photographs 10 and 11).
- 2) The EPA Inspection Team observed sediment track-out from the facility's southern entrance onto Cairo Lane (refer to Appendix B, Photographs 4 and 5).

SECTION IV – LIST OF APPENDICES

Appendix A – Aerial Location

Appendix B – Photograph Log

Appendix C – Facility Document Submissions