U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION III WATER BRANCH, ENFORCEMENT
AND COMPLIANCE ASSURANCE DIVISION
CLEAN WATER ACT
COMPLIANCE INSPECTION REPORT

for

Name of Facility: Denton Scrap Metal Recycling, LLC
Facility Address: 24769-A Meeting House Rd, Denton, MD 21629
Mailing Address: 24769-A Meeting House Rd, Denton, MD 21629

Report Prepared on: 3/22/2022 By: Taylor Fontaine,
Date *Signature*
Environmental Scientist (PG Environmental)

Report Final as of: March 23, 2022 By: Steven Maslowski, EPA
Date *Signature*

General Information

Type of Inspection:	Stormwater
Owner:	Denton Scrap Metal Recycling, LLC
Operator:	Denton Scrap Metal Recycling, LLC
Permittee:	Denton Scrap Metal Recycling, LLC
NPDES Permit No:	MDR003194
NPDES Permit Effective Date:	January 1, 2014
NPDES Permit Expiration Date:	December 31, 2018
Receiving Water and/or MS4:	Upper Choptank River
Latitude and Longitude:	38° 53’ 28.52” N, 75° 50’ 39.47” W

On-Site Facility Inspection Overview

On February 16, 2022, EPA contractors, PG Environmental and Eastern Research Group (hereinafter, collectively referred to as the EPA Inspection Team) conducted a compliance evaluation inspection at Denton Scrap Metal Recycling, LLC (hereinafter, Facility) in Denton, Maryland. A representative from the Maryland Department of the Environment (MDE) also attended the inspection.

Approximate Entry Time: 8:30 AM (EST) **Approximate Exit Time:** 11:15 AM (EST)

Unique Project Identifier (UPI): 3E22WN030A

TABLE OF CONTENTS

Page

I. INTRODUCTION

On February 16, 2022, EPA contractors, PG Environmental and Eastern Research Group (hereinafter, collectively referred to as the EPA Inspection Team) conducted a compliance evaluation inspection at Denton Scrap Metal Recycling, LLC (hereinafter, Facility) in Denton, Maryland. A representative from the Maryland Department of the Environment (MDE) also attended the inspection. Denton Scrap Metal Recycling, LLC is identified as the Permittee. The primary purpose of the inspection was to review the onsite Facility operations, to review the accuracy and reliability of the Facility's self-monitoring and reporting program, and to obtain information that will assist EPA in assessing the Facility's compliance with the requirements of the Permit.

The Facility is located at 24769 Meeting House Road, Denton, MD 21629, and is a scrap and waste recycling facility. The Facility employs a staff of 3-4 employees to process recyclables, operate and maintain the yard, and perform administrative functions. Staff from the environmental consulting firm, Grapewell Stormwater Consulting, Inc., provide general consulting guidance and sampling kits for quarterly visual monitoring. Grapewell staff also provide stormwater pollution prevention plan (SWPPP) updates and, in the future, will perform annual comprehensive site inspections. The Facility is responsible for all other Permit requirements. The Facility previously employed James Environmental Management, Inc. to provide SWPPP updates; perform employee training; conduct annual comprehensive site inspections; and conduct quarterly visual inspections for the Facility. Grapewell Stormwater Consulting, Inc. was hired approximately six months prior to the inspection to replace James Environmental Management, Inc.. The Facility sends quarterly visual monitoring samples to Chesapeake Labs Inc. for analysis. The Facility's onsite SWPPP map identifies one (1) outfall onsite (Outfall 001). Outfall 001 is located on the Facility's southern perimeter, south of a settling basin.

II. INSPECTION PROCESS

Inspection Opening Conference

The EPA Inspection Team arrived at the Facility at approximately 8:30 AM (EST) for the inspection. Mr. Taylor Fontaine of PG Environmental displayed his Clean Water Act Inspector credential to Kelly Boyle of Joseph Smith & Sons Inc. and Ben Wells of Grapewell Stormwater Consulting, Inc. (hereinafter, Facility representatives). Joseph Smith & Sons Inc. owns the Facility and other scrap yards. The EPA Inspection Team explained that any information that the Facility deemed to be confidential business information ("CBI") should be identified during the inspection and it would be handled as CBI according to EPA's CBI procedures. Table 1 describes the individuals that participated in the inspection.

Table 1. Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Contractors			
Taylor Fontaine, Inspector	PG Environmental	(703) 956-1977	taylor.fontaine@pgenv.com
Kelly Davis, Inspector	Eastern Research Group, Inc.	(703) 633-1646	kelly.davis@erg.com
Facility Representatives			
Kelly Boyle	Smith Industries	(410) 479-2110	KBoyle@jsmith-sons.com
Ben Wells, Environmental Consultant	Grapewell Stormwater Consulting, Inc.	(443) 340-7557	ben@grapewellconsulting.com
State or County Representatives			
Michele Burroughs, Regulatory and Compliance Engineer	Maryland Department of the Environment	(410) 901-4043	michele.burroughs@maryland.gov

Weather and Precipitation

Precipitation was not observed on the day of the inspection. Partly cloudy skies with a maximum temperature of approximately 41 degrees Fahrenheit were experienced on the day of 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 below.

Precipitation Preceding Inspection

Station Name	Date	Precipitation Amount (inches)[1]
Denton 5.8 WSW, MD US US1MDCL0010	2/11/2022	0.00
Denton 5.8 WSW, MD US US1MDCL0010	2/12/2022	0.00
Denton 5.8 WSW, MD US US1MDCL0010	2/13/2022	0.00
Denton 5.8 WSW, MD US US1MDCL0010	2/14/2022	0.04
Denton 5.8 WSW, MD US US1MDCL0010	2/15/2022	Not reported
Denton 5.8 WSW, MD US US1MDCL0010	2/16/2022	Not reported

Facility Site Walk

As part of the process, the EPA Inspection Team visually observed Facility conditions in the presence of the Facility representatives. Areas viewed during the Facility walk include:

- Office;
- Non-ferrous material and used battery storage garage;
- Truck scale;
- Outdoor material storage area;
- Envirorack;
- Fluids storage area;
- Baler;
- Retention area; and
- Outfall 001.

The Facility encompasses approximately 3.25 acres and contains an office building connected to a non-ferrous material and used battery storage garage (refer to Appendix B, Photographs 1 and 2), a roadway and a truck scale (refer to Appendix B, Photograph 3), an outdoor material storage area (refer to Appendix B, Photographs 4 through 10), an Envirorack (refer to Appendix B, Photograph 11) in a covered fluids storage area (refer to Appendix B, Photographs 11 through 16), a retention area and Outfall 001 (refer to Appendix B, Photographs 17 through 24), and a baler (refer to Appendix B, Photographs 25 through 27). All stormwater onsite drains to the settling basin at the Facility's southern retention area located by the southern perimeter (refer to Appendix B, Photograph 17). Stormwater then is directed through an earthen channel that contains multiple filter socks and a rock check dam (refer to Appendix B, Photographs 18 through 22). Stormwater is then discharged from the Facility's outfall, Outfall 001 (refer to Appendix B, Photographs 23 and 24). The Facility does not connect to a municipal separate storm sewer system. The Facility is bordered by Schultz & Sons Salvage Inc. to the west and east. The two properties are not divided by a barrier.

The Facility receives non-ferrous and ferrous metals including "white goods," which include household items such as refrigerators and microwaves, and cars. The Facility accepts wrecked vehicles that are ten years or older. The Facility exports collected mercury switches every two years. Accepted vehicles are first weighed on a scale next to the non-ferrous material and used battery storage garage. Vehicles are then

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

placed on the Envirorack (refer to Appendix B, Photograph 11), removed of batteries, and drained of liquids under a cover in the liquid storage area. Vehicles and other metals are collected and crushed using the onsite baler (refer to Appendix B, Photographs 25 through 27). Used oil from vehicles and oily water from the baler are collected in 550-gallon tanks and stored in the liquid storage area (refer to Appendix B, Photographs 11, 13, and 14). Diesel is collected in a 500-gallon double-walled tank and stored in the liquid storage area (refer to Appendix B, Photograph 12). Motor oil and hydraulic liquids are collected in 300-gallon totes and stored in the liquid storage area (refer to Appendix B, Photographs 15 and 16). The crushed material then is transported to a facility in Capital Heights, MD for further processing. The Facility representatives stated that a spill kit is stored onsite.

Records Review

The EPA Inspection Team conducted a records review to evaluate the Facility's compliance with the Permit. Most of the records and reports required by the Permit were available for review prior to and after the inspection. The Facility's electronic discharge monitoring reports (eDMRs) were provided electronically and reviewed offsite prior to the onsite inspection. The following were reviewed:

- eDMR data during the period from March 2017 (First Quarter following Permit effective date through December 2021);
- The SWPPP, dated June 24, 2016 and revised SWPPP dated February 15, 2022 (refer to Appendix C, Exhibits 1 through 5) (reviewed onsite);
- Routine Facility Inspection records from December 2017 through December 2021 (reviewed onsite);
- Comprehensive Site Compliance Evaluation records for 2017, 2018, 2019, 2020, and 2021 (reviewed onsite);
- Facility Staff Annual Training records for 2017, 2018, 2019, 2020, 2021, and 2022 (reviewed onsite); and
- Quarterly Visual Inspection records for December 2017 through December 2021 (reviewed onsite).

Summary of 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.

SWPPP Requirements

Permit Part III.C.2.c states that the site map must provide the following:

i. "size of the property in acres;
ii. the location and extent of significant structures and impervious surfaces
iii. the location and extent for planned restoration of impervious surfaces, or nutrient reduction measures;
iv. directions of stormwater flow (use arrows);
v. locations of all existing structural control measures or BMPs;
vi. locations of all receiving waters in the immediate vicinity of your facility, indicating if any of the waters are impaired and if so, whether the waters have TMDLs established for them;
vii. locations of all stormwater conveyances including ditches, pipes, and swales;
viii. locations of potential pollutant sources identified under Part III.C.3;
ix. locations where significant spills or leaks identified under Part III.C.3 have occurred;
x. locations of all stormwater monitoring points;

xi. locations of all stormwater inlets and outfalls, with a unique identification code for each outfall (e.g., Outfall No. 1, No. 2, etc.) indicating if you are treating one or more outfalls as substantially identical, and an approximate outline of areas draining to each outfall;
xii. municipal separate storm sewer systems, where your stormwater discharges to them;
xiii. locations and descriptions of all non-stormwater discharges identified under Part I.E.3;
xiv. locations of the following activities where such activities are exposed to precipitation:

- fueling stations;
- vehicle and equipment maintenance and/or cleaning areas;
- loading/unloading areas;
- locations used for treatment, storage, or disposal of wastes;
- liquid storage tanks;
- processing and storage areas;"

Observation 1. The Facility SWPPP map did not include all Permit-required elements. Specifically, the onsite SWPPP map (refer to Appendix C, Exhibit 1) depicted the settling basin in a location that did not match the location observed onsite. The SWPPP map also did not include locations of existing structural control measures such as filter socks or the rock check dam, and did not include locations of stormwater conveyances such as the earthen channel or the pipes that discharge to Outfall 001 (refer to Appendix B, Photographs 17 through 24). The Facility representatives provided an updated copy of the SWPPP on February 18, 2022 (refer to Appendix C, Exhibit 2). The updated SWPPP map did not include the location of the settling basin, filter socks, rock check dam, earthen channel, or pipes that discharge to Outfall 001.

Part III.C.7 states that, "You must modify your SWPPP whenever necessary to address any of the triggering conditions for corrective action in Part IV and to ensure that they do not reoccur, or to reflect changes implemented when a review following the triggering conditions in Part IV.B indicates that changes to your control measures are necessary to meet the effluent limits in this permit. Changes to your SWPPP document must be made in accordance with the corrective action deadlines in Parts IV.C and IV.D, and must be signed and dated in accordance with Part II.C."

Observation 2. A Facility representative did not sign and date modifications to the SWPPP. The updated SWPPP had a space for logging modifications in Appendix 8 – SWPPP Modifications (refer to Appendix C, Exhibit 2). Appendix 8 did not document any modifications. The EPA Inspection Team observed during the inspection that the SWPPP was modified in 2019, as observed on Management Review and Certification (refer to Appendix C, Exhibit 3), and 2021, as observed in the SWPPP Certification (refer to Appendix C, Exhibit 4). The Facility also provided the EPA Inspection Team with an updated SWPPP immediately after the inspection; however, these changes were not documented.

Benchmark Exceedances

Part V.B of the Permit requires the Permittee to "monitor for any benchmark parameters specified for the industrial sector(s), both primary industrial activity and any co-located industrial activities, applicable to your discharge." The schedule requires the Permittee to "conduct benchmark monitoring quarterly for four (4) full quarters, starting the first full monitoring period (found in Part V.C.7) that occurs, six (6) months after registering under this permit." For data not exceeding benchmarks, after "collection of 4 quarterly samples, if the average of the 4 monitoring values for any parameter does not exceed the benchmark, you have fulfilled your monitoring requirements for that parameter for the permit term." For data exceeding benchmarks after collection of 4 quarters of samples, "if the average of the 4 monitoring values for any

parameter exceeds the benchmark, you must review the selection, design, installation, and implementation of selected control measures to determine if modifications are necessary to meet the effluent limits in this permit."

Permit Part IV states that, "If any of the following conditions occur, you must review and revise the selection, design, installation, and implementation of your control measures to ensure that the condition is eliminated and will not be repeated in the future…

2. a discharge violates a numeric effluent limit…
5. you find in your routine facility inspection (Part V.A.1), quarterly visual assessment (Part V.A.3), or comprehensive site inspection (Part V.A.2) that your control measures are not being properly operated and maintained."

Part IV.B defines a mathematically certain exceedance as a, "sum of quarterly sample results to date is more than 4 times the benchmark level." These exceedances also require that the permittee, "review the selection, design, installation, and implementation of your control measures to determine if modifications are necessary to meet the effluent limits in this permit."

Observation 3. Based on a review of the Facility's Integrated Compliance Information System (ICIS) Data Report (refer to Appendix C, Exhibit 5), the EPA Inspection Team observed the Facility had 29 instances from March 2018 through December 2021 when the average of 4 consecutive parameter monitoring values exceeded benchmark concentrations. These average exceedances occur 5 times for total recoverable iron; 9 times for copper; 6 times for zinc; 6 times for aluminum; and 3 times for chemical oxygen demand (COD). Additionally, the data shows 2 mathematically certain exceedances (where a single sample concentration is greater than four times the limit) of zinc. All monitoring values for TSS, total recoverable iron, copper, lead, zinc, aluminum, and COD are summarized in Tables 2 through 8 below. All benchmark exceedances are highlighted in red.

Table 2. Outfall 001 Final Benchmark Exceedances for Total Suspended Solids (TSS) (March 2017 through December 2021)

Monitoring Period End Date	Parameter	Limit Value	Concentration	Four Quarter Concentration Averages (Benchmark Exceedances Are Highlighted Red)	% of the Limit (Red if it Exceeds 4X the Benchmark)	Concentration Units
03/31/2017	Solids, total suspended	100	Not reported	N/A	-	mg/L
06/30/2017	Solids, total suspended	100	Not reported	N/A	-	mg/L
09/30/2017	Solids, total suspended	100	60	N/A	60	mg/L
12/31/2017	Solids, total suspended	100	13	18	13	mg/L
03/31/2018	Solids, total suspended	100	<3.2	-*	-	mg/L
06/30/2018	Solids, total suspended	100	<3.2	-*	-	mg/L
09/30/2018	Solids, total suspended	100	32	-*	32	mg/L
12/31/2018	Solids, total suspended	100	<5	-*	-	mg/L
03/31/2019	Solids, total suspended	100	<5	-*	-	mg/L
06/30/2019	Solids, total suspended	100	20	-*	20	mg/L
09/30/2019	Solids, total suspended	100	6	-*	6	mg/L
12/31/2019	Solids, total suspended	100	110	-*	110	mg/L
03/31/2020	Solids, total suspended	100	9	36	9	mg/L
06/30/2020	Solids, total suspended	100	10	34	10	mg/L
09/30/2020	Solids, total suspended	100	<2.5	-*	-	mg/L
12/31/2020	Solids, total suspended	100	17	-*	17	mg/L
03/31/2021	Solids, total suspended	100	35	-*	35	mg/L
06/30/2021	Solids, total suspended	100	6	-*	6	mg/L
09/30/2021	Solids, total suspended	100	4	16	4	mg/L
12/31/2021	Solids, total suspended	100	7	13	7	mg/L

* = Value could not be determined because a concentration was too small to be determined accurately.

Table 3. Outfall 001 Final Benchmark Exceedances for Total Recoverable Iron (March 2017 through December 2021)

Monitoring Period End Date	Parameter	Limit Value	Concentration	Four Quarter Concentration Averages (Benchmark Exceedances Are Highlighted Red)	% of the Limit (Red if it Exceeds 4X the Benchmark)	Concentration Units
03/31/2017	Iron, total recoverable	1.00	Not reported	N/A	-	mg/L
06/30/2017	Iron, total recoverable	1.00	Not reported	N/A	-	mg/L
09/30/2017	Iron, total recoverable	1.00	2.10	N/A	210	mg/L
12/31/2017	Iron, total recoverable	1.00	0.44	0.64	44	mg/L
03/31/2018	Iron, total recoverable	1.00	0.19	0.68	19	mg/L
06/30/2018	Iron, total recoverable	1.00	0.31	0.76	31	mg/L
09/30/2018	Iron, total recoverable	1.00	1.50	0.61	150	mg/L
12/31/2018	Iron, total recoverable	1.00	0.77	0.69	77	mg/L
03/31/2019	Iron, total recoverable	1.00	0.23	0.70	23	mg/L
06/30/2019	Iron, total recoverable	1.00	1.20	0.93	120	mg/L
09/30/2019	Iron, total recoverable	1.00	1.40	0.90	140	mg/L
12/31/2019	Iron, total recoverable	1.00	2.80	1.41	280	mg/L
03/31/2020	Iron, total recoverable	1.00	0.65	1.51	65	mg/L
06/30/2020	Iron, total recoverable	1.00	1.50	1.59	150	mg/L
09/30/2020	Iron, total recoverable	1.00	0.38	1.33	38	mg/L
12/31/2020	Iron, total recoverable	1.00	0.57	0.78	57	mg/L
03/31/2021	Iron, total recoverable	1.00	1.70	1.04	170	mg/L
06/30/2021	Iron, total recoverable	1.00	0.97	0.91	97	mg/L
09/30/2021	Iron, total recoverable	1.00	0.07	0.83	7	mg/L
12/31/2021	Iron, total recoverable	1.00	0.32	0.76	32	mg/L

* = Value could not be determined because a concentration was too small to be determined accurately.

Table 4. Outfall 001 Final Benchmark Exceedances for Copper (March 2017 through December 2021)

Monitoring Period End Date	Parameter	Limit Value	Concentration	Four Quarter Concentration Averages (Benchmark Exceedances Are Highlighted Red)	% of the Limit (Red if it Exceeds 4X the Benchmark)	Concentration Units
03/31/2017	Copper, total [as Cu]	0.014	Not reported	N/A	-	mg/L
06/30/2017	Copper, total [as Cu]	0.014	Not reported	N/A	-	mg/L
09/30/2017	Copper, total [as Cu]	0.014	0.021	N/A	150	mg/L
12/31/2017	Copper, total [as Cu]	0.014	0.017	0.0095	121	mg/L
03/31/2018	Copper, total [as Cu]	0.014	0.003	0.010	24	mg/L
06/30/2018	Copper, total [as Cu]	0.014	0.010	0.013	71	mg/L
09/30/2018	Copper, total [as Cu]	0.014	0.024	0.014	171	mg/L
12/31/2018	Copper, total [as Cu]	0.014	0.022	0.015	157	mg/L
03/31/2019	Copper, total [as Cu]	0.014	0.010	0.016	71	mg/L
06/30/2019	Copper, total [as Cu]	0.014	0.035	0.023	250	mg/L
09/30/2019	Copper, total [as Cu]	0.014	0.020	0.022	143	mg/L
12/31/2019	Copper, total [as Cu]	0.014	0.010	0.019	71	mg/L
03/31/2020	Copper, total [as Cu]	0.014	<0.008	-*	-	mg/L
06/30/2020	Copper, total [as Cu]	0.014	0.016	-*	114	mg/L

Monitoring Period End Date	Parameter	Limit Value	Concentration	Four Quarter Concentration Averages (Benchmark Exceedances Are Highlighted Red)	% of the Limit (Red if it Exceeds 4X the Benchmark)	Concentration Units
09/30/2020	Copper, total [as Cu]	0.014	0.010	-*	71	mg/L
12/31/2020	Copper, total [as Cu]	0.014	0.024	-*	171	mg/L
03/31/2021	Copper, total [as Cu]	0.014	0.056	0.027	400	mg/L
06/30/2021	Copper, total [as Cu]	0.014	0.028	0.030	200	mg/L
09/30/2021	Copper, total [as Cu]	0.014	0.048	0.039	343	mg/L
12/31/2021	Copper, total [as Cu]	0.014	0.066	0.050	474	mg/L

[1] The benchmark value is hardness dependent.
* = Value could not be determined because a concentration was too small to be determined accurately.

Table 5. Outfall 001 Final Benchmark Exceedances for Lead (March 2017 through December 2021)

Monitoring Period End Date	Parameter	Limit Value	Concentration	Four Quarter Concentration Averages (Benchmark Exceedances Are Highlighted Red)	% of the Limit (Red if it Exceeds 4X the Benchmark)	Concentration Units
03/31/2017	Lead, total [as Pb]	0.082	Not reported	N/A	-	mg/L
06/30/2017	Lead, total [as Pb]	0.082	Not reported	N/A	-	mg/L
09/30/2017	Lead, total [as Pb]	0.082	0.0062	N/A	8	mg/L
12/31/2017	Lead, total [as Pb]	0.082	0.0029	0.002275	4	mg/L
03/31/2018	Lead, total [as Pb]	0.082	0.0025	0.0029	3	mg/L
06/30/2018	Lead, total [as Pb]	0.082	0.0035	0.003775	4	mg/L
09/30/2018	Lead, total [as Pb]	0.082	0.0060	0.003725	7	mg/L
12/31/2018	Lead, total [as Pb]	0.082	<0.002	-*	-	mg/L
03/31/2019	Lead, total [as Pb]	0.082	<0.002	-*	-	mg/L
06/30/2019	Lead, total [as Pb]	0.082	0.0033	-*	4	mg/L
09/30/2019	Lead, total [as Pb]	0.082	<0.002	-*	-	mg/L
12/31/2019	Lead, total [as Pb]	0.082	0.0075	-*	9	mg/L
03/31/2020	Lead, total [as Pb]	0.082	0.0031	-*	4	mg/L
06/30/2020	Lead, total [as Pb]	0.082	0.0020	-*	2	mg/L
09/30/2020	Lead, total [as Pb]	0.082	0.0059	0.004625	7	mg/L
12/31/2020	Lead, total [as Pb]	0.082	0.0120	0.00575	15	mg/L
03/31/2021	Lead, total [as Pb]	0.082	0.0340	0.013475	41	mg/L
06/30/2021	Lead, total [as Pb]	0.082	0.0042	0.014025	5	mg/L
09/30/2021	Lead, total [as Pb]	0.082	0.0044	0.01365	5	mg/L
12/31/2021	Lead, total [as Pb]	0.082	0.0044	0.01175	5	mg/L

* = Value could not be determined because a concentration was too small to be determined accurately.

Table 6. Outfall 001 Final Benchmark Exceedances for Zinc (March 2017 through December 2021)

Monitoring Period End Date	Parameter	Limit Value	Concentration	Four Quarter Concentration Averages (Benchmark Exceedances Are Highlighted Red)	% of the Limit (Red if it Exceeds 4X the Benchmark)	Concentration Units
03/31/2017	Zinc, total [as Zn]	0.12	Not reported	N/A	-	mg/L
06/30/2017	Zinc, total [as Zn]	0.12	Not reported	N/A	-	mg/L
09/30/2017	Zinc, total [as Zn]	0.12	0.08	N/A	68	mg/L
12/31/2017	Zinc, total [as Zn]	0.12	0.09	0.04225	73	mg/L
03/31/2018	Zinc, total [as Zn]	0.12	0.09	0.064	73	mg/L
06/30/2018	Zinc, total [as Zn]	0.12	0.06	0.07925	51	mg/L

Monitoring Period End Date	Parameter	Limit Value	Concentration	Four Quarter Concentration Averages (Benchmark Exceedances Are Highlighted Red)	% of the Limit (Red if it Exceeds 4X the Benchmark)	Concentration Units
09/30/2018	Zinc, total [as Zn]	0.12	0.08	0.07925	68	mg/L
12/31/2018	Zinc, total [as Zn]	0.12	0.07	0.07375	55	mg/L
03/31/2019	Zinc, total [as Zn]	0.12	0.06	0.06575	46	mg/L
06/30/2019	Zinc, total [as Zn]	0.12	0.05	0.064	45	mg/L
09/30/2019	Zinc, total [as Zn]	0.12	0.05	0.0555	39	mg/L
12/31/2019	Zinc, total [as Zn]	0.12	0.12	0.069	100	mg/L
03/31/2020	Zinc, total [as Zn]	0.12	0.10	0.08025	83	mg/L
06/30/2020	Zinc, total [as Zn]	0.12	0.07	0.08375	57	mg/L
09/30/2020	Zinc, total [as Zn]	0.12	0.27	0.1395	225	mg/L
12/31/2020	Zinc, total [as Zn]	0.12	0.54	0.2445	450	mg/L
03/31/2021	Zinc, total [as Zn]	0.12	0.70	0.3945	583	mg/L
06/30/2021	Zinc, total [as Zn]	0.12	0.09	0.399	72	mg/L
09/30/2021	Zinc, total [as Zn]	0.12	0.13	0.364	108	mg/L
12/31/2021	Zinc, total [as Zn]	0.12	0.13	0.2613	108	mg/L

[1] The benchmark value is hardness dependent.
* = Value could not be determined because a concentration was too small to be determined accurately.

Table 7. Outfall 001 Final Benchmark Exceedances for Total Recoverable Aluminum (March 2017 through December 2021)

Monitoring Period End Date	Parameter	Limit Value	Concentration	Four Quarter Concentration Averages (Benchmark Exceedances Are Highlighted Red)	% of the Limit (Red if it Exceeds 4X the Benchmark)	Concentration Units
03/31/2017	Aluminum, total recoverable	0.75	Not reported	N/A	-	mg/L
06/30/2017	Aluminum, total recoverable	0.75	Not reported	N/A	-	mg/L
09/30/2017	Aluminum, total recoverable	0.75	2.30	N/A	307	mg/L
12/31/2017	Aluminum, total recoverable	0.75	0.22	0.63	29	mg/L
03/31/2018	Aluminum, total recoverable	0.75	0.08	0.65	11	mg/L
06/30/2018	Aluminum, total recoverable	0.75	0.14	0.685	19	mg/L
09/30/2018	Aluminum, total recoverable	0.75	0.90	0.335	120	mg/L
12/31/2018	Aluminum, total recoverable	0.75	1.30	0.605	173	mg/L
03/31/2019	Aluminum, total recoverable	0.75	0.30	0.66	40	mg/L
06/30/2019	Aluminum, total recoverable	0.75	1.30	0.95	173	mg/L
09/30/2019	Aluminum, total recoverable	0.75	0.22	0.78	29	mg/L
12/31/2019	Aluminum, total recoverable	0.75	2.10	0.98	280	mg/L
03/31/2020	Aluminum, total recoverable	0.75	0.58	1.05	77	mg/L
06/30/2020	Aluminum, total recoverable	0.75	0.27	0.7925	36	mg/L
09/30/2020	Aluminum, total recoverable	0.75	0.08	0.75775	11	mg/L
12/31/2020	Aluminum, total recoverable	0.75	0.27	0.30025	36	mg/L
03/31/2021	Aluminum, total recoverable	0.75	0.96	0.39525	128	mg/L

Monitoring Period End Date	Parameter	Limit Value	Concentration	Four Quarter Concentration Averages (Benchmark Exceedances Are Highlighted Red)	% of the Limit (Red if it Exceeds 4X the Benchmark)	Concentration Units
06/30/2021	Aluminum, total recoverable	0.75	<0.05	-*	-	mg/L
09/30/2021	Aluminum, total recoverable	0.75	<0.05	-*	-	mg/L
12/31/2021	Aluminum, total recoverable	0.75	0.13	-*	17	mg/L

* = Value could not be determined because a concentration was too small to be determined accurately.

Table 8. Outfall 001 Final Benchmark Exceedances for Chemical Oxygen Demand (March 2017 through December 2021)

Monitoring Period End Date	Parameter	Limit Value	Concentration	Four Quarter Concentration Averages (Benchmark Exceedances Are Highlighted Red)	% of the Limit (Red if it Exceeds 4X the Benchmark)	Concentration Units
03/31/2017	Chemical Oxygen Demand [COD]	120	Not reported	N/A	-	mg/L
06/30/2017	Chemical Oxygen Demand [COD]	120	Not reported	N/A	-	mg/L
09/30/2017	Chemical Oxygen Demand [COD]	120	45	N/A	38	mg/L
12/31/2017	Chemical Oxygen Demand [COD]	120	21	17	18	mg/L
03/31/2018	Chemical Oxygen Demand [COD]	120	7	18	6	mg/L
06/30/2018	Chemical Oxygen Demand [COD]	120	8	20	7	mg/L
09/30/2018	Chemical Oxygen Demand [COD]	120	37	18	31	mg/L
12/31/2018	Chemical Oxygen Demand [COD]	120	43	24	36	mg/L
03/31/2019	Chemical Oxygen Demand [COD]	120	16	26	13	mg/L
06/30/2019	Chemical Oxygen Demand [COD]	120	62	40	52	mg/L
09/30/2019	Chemical Oxygen Demand [COD]	120	40	40	33	mg/L
12/31/2019	Chemical Oxygen Demand [COD]	120	66	46	55	mg/L
03/31/2020	Chemical Oxygen Demand [COD]	120	<6.4	-*	-	mg/L
06/30/2020	Chemical Oxygen Demand [COD]	120	140	-*	117	mg/L
09/30/2020	Chemical Oxygen Demand [COD]	120	28	-*	23	mg/L
12/31/2020	Chemical Oxygen Demand [COD]	120	213	-*	178	mg/L
03/31/2021	Chemical Oxygen Demand [COD]	120	157	135	131	mg/L
06/30/2021	Chemical Oxygen Demand [COD]	120	63	115	53	mg/L
09/30/2021	Chemical Oxygen Demand [COD]	120	74	127	62	mg/L
12/31/2021	Chemical Oxygen Demand [COD]	120	351	161	293	mg/L

* = Value could not be determined because a concentration was too small to be determined accurately.

Observation 4. The EPA Inspection Team observed that the Facility's onsite SWPPP documented recommended corrective actions to prevent further benchmark exceedances but did not document whether corrective actions were implemented (refer to Appendix C, Exhibit 6).

Permit Part 4.c states that, "If you are required to do benchmark monitoring for specific pollutants you must report the quarterly measurements no later than 28 days following the Monitoring Period (Part V. C.7), and according to the other Monitoring Procedures (Part V.C)."

Observation 5. The Facility did not submit Quarter 1 or Quarter 2, 2017, benchmark monitoring quarterly measurements as reported in the ICIS Data Report and Detailed Facility Report (refer to Appendix C, Exhibits 5 and 7). The Facility submitted the Quarter 3 and Quarter 4, 2017 benchmark monitoring quarterly measurements 286 days late and 193 days late respectively, as summarized in Table 9 below. Quarter 3, 2017 measurements were due on October 28, 2017. Quarter 4, 2017 measurements were due on January 28, 2018.

Table 9. Outfall 001 Late or Unsubmitted Reports

NPDES ID	Monitoring Period End Date	Parameter	DMR Received Date	Number of Days Late
MDR003194	03/31/2017	Aluminum, total recoverable	Not received	N/A
MDR003194	03/31/2017	Chemical Oxygen Demand [COD]	Not received	N/A
MDR003194	03/31/2017	Copper, total [as Cu]	Not received	N/A
MDR003194	03/31/2017	Iron, total recoverable	Not received	N/A
MDR003194	03/31/2017	Lead, total [as Pb]	Not received	N/A
MDR003194	03/31/2017	Solids, total suspended	Not received	N/A
MDR003194	03/31/2017	Zinc, total [as Zn]	Not received	N/A
MDR003194	06/30/2017	Aluminum, total recoverable	Not received	N/A
MDR003194	06/30/2017	Chemical Oxygen Demand [COD]	Not received	N/A
MDR003194	06/30/2017	Copper, total [as Cu]	Not received	N/A
MDR003194	06/30/2017	Iron, total recoverable	Not received	N/A
MDR003194	06/30/2017	Lead, total [as Pb]	Not received	N/A
MDR003194	06/30/2017	Solids, total suspended	Not received	N/A
MDR003194	06/30/2017	Zinc, total [as Zn]	Not received	N/A
MDR003194	09/30/2017	Aluminum, total recoverable	8/10/2018	286
MDR003194	09/30/2017	Chemical Oxygen Demand [COD]	8/10/2018	286
MDR003194	09/30/2017	Copper, total [as Cu]	8/10/2018	286
MDR003194	09/30/2017	Iron, total recoverable	8/10/2018	286
MDR003194	09/30/2017	Lead, total [as Pb]	8/10/2018	286
MDR003194	09/30/2017	Solids, total suspended	8/10/2018	286
MDR003194	09/30/2017	Zinc, total [as Zn]	8/10/2018	286
MDR003194	12/31/2017	Aluminum, total recoverable	8/10/2018	193
MDR003194	12/31/2017	Chemical Oxygen Demand [COD]	8/10/2018	193
MDR003194	12/31/2017	Copper, total [as Cu]	8/10/2018	193
MDR003194	12/31/2017	Iron, total recoverable	8/10/2018	193
MDR003194	12/31/2017	Lead, total [as Pb]	8/10/2018	193
MDR003194	12/31/2017	Solids, total suspended	8/10/2018	193
MDR003194	12/31/2017	Zinc, total [as Zn]	8/10/2018	193

Proper Operation and Maintenance

Part III.B.1.b.ii states that, "You must keep clean all exposed areas that are potential sources of pollutants, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers. A good practice for ensuring housekeeping activities are performed at regular intervals would be keeping a schedule for routine grounds maintenance and cleanup."

Observation 6. The EPA Inspection Team made the following good housekeeping observations at the Facility:

1. Staining and debris was observed by piles of recyclables in the material storage area, underneath a 300-gallon tote on the pavement and on the shipping container, and north of the baler (refer to Appendix B, Photographs 5, 16, 27).
2. Sediment was observed in the earthen channel that leads from the settling basin to Outfall 001 (refer to Appendix B, Photographs 19 through 22).

Closing Conference

After the Facility walk, the EPA Inspection Team met with the Facility representatives for a closing conference and shared their preliminary observations. 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 the EPA Inspection Team and 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 the additional review of materials following the inspection.

The inspection concluded at approximately 11:15 AM (EST).