

EPA COMPLIANCE EVALUATION INSPECTION REPORT

Purpose:

Compliance Evaluation Inspection under the Clean Water Act

Facility Name and Address:

East West Trading, LLC
505 S. 22nd Street
East St. Louis, IL 62207

NPDES Permit Number: No Permit

Date of Inspection: 4/13/2022

EPA Representative:

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Facility Representatives:

Abigail Helfrich, Sales and Logistics
Shae “Joey” Griffith, Chief Operating Officer

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Inspector Signature and Date: CHERYL BURDETT  Digitally signed by CHERYL BURDETT
Date: 2022.05.06 14:03:59 -05'00'

Approver Title: Ryan Bahr, Section 2 Supervisor, Water Enforcement and Compliance
Assurance Branch

Approver Signature and Date: Bahr, Ryan  Digitally signed by Bahr, Ryan
Date: 2022.05.12 08:16:32 -05'00'

Introduction:

East West Trading, LLC is a plastic and paper recycling facility. It is listed under the SIC Code 5199 for nondurable goods.

EPA conducted an unannounced inspection on April 13, 2022, at East West Trading, LLC located at 505 South 22nd Street East St. Louis, Illinois 62207.

The Facility is 2.12 miles east of the Mississippi River, a traditional navigable waterway. The Mississippi River is impaired for the following pollutants Polychlorinated Biphenyls (PCBs) and Mercury.

Opening Conference:

At approximately 8:45 a.m., EPA arrived at East West Trading, LLC located at 505 South 22nd Street East St. Louis, Illinois 62207. We introduced ourselves to the Sales and Logistics Manager Abigail Helfrich and to Mr. Shae Griffith (Mr. Griffith), Chief Operating Officer. EPA showed our credentials at 9:07 a.m. and Wayne Caughman showed his ID and explained that he is with Illinois Environmental Protection Agency. EPA explained the purpose of our inspection was to conduct an Industrial Storm Water Inspection.

EPA stated that we were going to ask questions from the National Pollutant Discharge Elimination System (NPDES) Industrial Storm Water Investigation and Case Development checklist and learn about the operation. EPA explained that after we go through the checklist, we would need to walk around the site to determine how the storm water on-site flows. Mr. Griffith stated that the storm water mostly pools on-site and then infiltrates into the ground. EPA asked if this site is currently under an NPDES Industrial Storm Water Permit or has a Storm Water Pollution Prevention Plan on-site. Mr. Griffith stated that he is not aware of any permit or SWPPP.

Mr. Griffith mentioned that they used to have Safety Data Sheets (SDS) on site for cleaning agents, but that the cleaning agents were nothing more than dish soap. Mr. Griffith said that these SDS sheets are not currently on-site. East West Trading, LLC employees six people.

EPA explained that if any of the information that we received or pictures that were taken were considered Confidential Business Information (CBI), he should let us know. If during the inspection, Mr. Griffith determined that something was CBI, he should inform us as we go through the checklist or take the photographs. He could also let us know after he reviews the inspection report.

Mr. Griffith explained that they take in plastic and cardboard that needs to be recycled from the companies that manufacture the plastic items such as caps, lids etc. During the manufacturing process of making the plastic item, if the plastics have flaws and are defective, the plastics are sold to East West Trading, LLC. East West Trading, LLC takes the defective plastics, grinds, or bales the items, and sells them to other companies or back to the same company. This type of plastic that has not come into contact with any outside contaminants is called “preform”. This preform material is worth more than the used plastics because it has had little contact with human hands and has not been sprayed or lined with any other materials. At this site, based on the

customer's request they can grind down the plastics or bale them, so that they can remove any unwanted air and ship more material.

The minimum that can be shipped is 40,000 lbs. According to Mr. Griffith, they ship approximately 42,000 lbs. The product is either shipped by rail or by semi-trucks. When they take in a product, it is inspected by the warehouse manager who verifies that the product does not have any chemical residue besides cleaning detergent, i.e., something like dish soap. The shipment of material is stored on-site, baled, or ground into fine particles, and immediately sold to some other company or sold back to the company that the material was received from. If the plastic has some other residue or chemical besides soap that is equivalent to dish soap, the product would be rejected and sent back to the company that they received it from.

This final baled or ground material is then scheduled to be shipped. East West Trading, LLC does not manufacture anything, but is a broker for waste plastics and cardboard. They take the materials from one company, bale or grind it, and store it on site until they have another company to purchase it or sell it back to the same company. At the time of EPA's inspection, there was an excess of material dated to be shipped in December that was still on-site due to shipping and supply problems.

As EPA was going through the checklist, Mr. Griffith said someone who he had thought was from Illinois Environmental Protection Agency came out last year to inspect the site. EPA later confirmed with Illinois EPA that no one from Illinois EPA or the county had been out to inspect this site.

EPA asked where the storm water that fall on-site flows. Mr. Griffith stated that storm water infiltrates into the ground. There is a low area in the corner of the facility, but it backs up against railroad tracks and a berm. According to Mr. Griffith, they are in a low area and this site does not discharge because water will eventually infiltrate into the ground. There are drains in the warehouse where the product is kept, but no water is used in any of their processes. Mr. Griffith is not sure where any of the drains would outlet.

Facility Walk-Around:

EPA started the walk-around of the Facility at approximately 9:30 AM outside the office at Docks 5 and 6. The facility has a total of three sets of docks; Docks 1 and 2, Docks 3 and 4, and Docks 5 and 6. Semi-trucks come in to unload plastics and cardboard. The docks are below ground level and are concrete. During precipitation events, the docks fill up with water. EPA observed all the docks, and each dock location had a sump pump installed to pump out water from the docks. Mr. Griffith stated that the water that is pumped out from the docks either infiltrates into the ground on the facility or flows back into the docks. (Photographs P4130252, P4120253, etc.)

Mr. Griffith showed EPA the location where the drinking water is piped in from East St. Louis. A Representative from East St. Louis left the vault open after some repairs were made, and Mr. Griffith covered it with Styrofoam to prevent freezing (P4130251). EPA continued to walk around the facility. The water from the roof drains flowed on to the ground as well.

Outside the gate of the facility, on South 22nd Street, EPA observed storm water drains in the curbs that transport storm water flow to the Mississippi River. (Photographs P4130256 through P4130258)

EPA observed loose plastics within cardboard boxes either in their shape or in grindings outside the warehouse. EPA also observed cardboard discarded all over the facility outside the warehouse. (Photograph P4130260.) We continued to observe both sides of the access road on the facility, but outside the warehouse. According to Mr. Griffith, the stuff stored outside was stuff taken in by the owner before he started working at East West Trading, LLC. EPA observed more plastics and cardboard stored against the southwest side of the office building.

EPA walked along the southwest edge of the facility. Along the southwest edge of the facility, EPA walked along and documented a storm water pathway that conveys the storm water that falls on the facility. It flowed to the northwest where there is a low area at the corner of the facility. The low area has a berm on one side and there are railroad tracks on another. The berm and the railroad tracks appeared to prevent the water from leaving the facility via surface flow in this location. EPA followed another storm water pathway that comes from the northeast side of the facility and drains to the same low area in the northwest corner of the facility. (Photographs P4130266 through P4130271.)

EPA walked back to the warehouse and observed Docks 3 and 4 where again a sump pump and pipes were installed to pump out water. (Photograph P4130272.) EPA photographed baled plastic barrels stored outside. EPA entered the warehouse where plastics and cardboard are stored that will be baled or put through the grinder. EPA observed the grinded product and watched as preform plastics are put through the grinder where they are grinded down to a ½ inch. (Photographs P4130273 through P4130275.)

It had been raining during the inspection, so EPA walked back outside of the facility to observe if storm water was flowing east toward South 22nd Street. EPA did not observe any flow toward South 22nd Street where the storm water drains are located on the street. Again, loose plastics and cardboard were observed in boxes or loosely all over the facility grounds. EPA went out onto South 22nd Street and observed another storm water drain on the same side as the facility. EPA observed flow from the street into the storm water drain but did not observe flow from the facility into the street. The storm drain was clogged with vegetation. EPA took photos from the street looking back into the property, EPA did not observe storm water leaving the site.

EPA went back into the warehouse to observe the baler. (Photographs P4130284-P4130287.)

Closing Briefing:

The walk-through ended at approximately 11:00 a.m. EPA stated that there is concern about the quantity of plastics and cardboard all over the outside of the facility. Mr. Griffith stated that he plans to get all of it cleaned up, so that nothing is stored outside.

Attachment: Photolog