

REPORT OF COMPLIANCE EVALUATION INSPECTION
(INDUSTRIAL STORMWATER)

Advantage Metals Recycling LLC. – Cheyenne Facility

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Authorization Number: **KSR000551**

BY
U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 7
ENFORCEMENT AND COMPLIANCE ASSURANCE DIVISION (ECAD)
WATER BRANCH/DRINKING WATER & INSPECTIONS SECTION (WB/DWIS)

ON
June 22, 2023

Introduction

At the request of the Water Branch (WB), Enforcement and Compliance Assurance Division (ECAD), a Compliance Evaluation Inspection (Industrial Stormwater) was conducted on June 22, 2023, at the Advantage Metals Recycling located at 1015 S. Packard in Kansas City, Kansas. The inspection was conducted under the authority of Section 308 of the Clean Water Act, as amended. It was conducted in accordance with the U.S. Environmental Protection Agency (EPA) Region 7 Standard Operating Procedures for Compliance Inspections (ENST SOP No. 2332). This narrative report presents the findings of the inspection.

Participants

Advantage Metals Recycling- Cheyenne Facility

- Serena Dehoney, EHS Director serena.dehoney@advantagerecycling.com
- Jacob Brooks, Facility Manager jacob.brooks@advantagerecycling.com
- Blair Jorgensen, Facility Supervisor
- Morgyn Stover, Facility Supervisor

Unified Government of Wyandotte County, Department of Air Quality

- Mark Weckwerth, Department of Air Quality

U.S. Environmental Protection Agency (EPA), Region 7

- Adam Hendrickson, Environmental Scientist, ECAD/WB/DWIS
- Naji J. Ahmad, Environmental Engineer, ECAD/WB/DWIS
- Luke Rodriguez, Environmental Scientist, ECAD/AB
- Christina Gallick, Environmental Scientist, ECAD/AB/CAPS

Procedures and Introduction

Naji Ahmad, Mark Weckwerth, Christina Gallick, Luke Rodriguez and I (Inspection Team), arrived at the Advantage Metals Recycling Cheyenne Facility (Facility) at 1:00 PM. on June 22, 2023. We met with Serena Dehoney, Blair Jorgensen, Jacob Brooks and Morgyn Stover (Facility Team). We introduced ourselves, presented our credentials, and I explained the purpose and procedures of the industrial stormwater compliance evaluation inspection. These included completing the Region 7 Industrial Stormwater Worksheet (Attachment 1), completing the U.S. EPA Confidentiality Notice, evaluating self-monitoring and stormwater management practices and the Stormwater Pollution Prevention Plan (SWPPP) (Attachment 3) and conducting a facility walk-through with photographs (Attachment 10).

I provided Ms. Dehoney with the U.S. EPA Small Business Resources Information Sheet and the U.S. EPA Confidentiality Notice. After a brief description of the Facility operations, Ms. Dehoney provided us with the SWPPP document and monitoring records. Records are stored electronically; therefore, I requested an electronic copy of the records to be sent via email. On July 12, 2023, Ms. Dehoney uploaded those documents into an EPA provided one drive folder.

Soon after, using a site map, the Facility Team escorted the Inspection Team on a visual inspection of the Facility. During the Facility walkthrough, we looked at Outfall 001 and material processing and storage area associated with Outfall 001. We observed material storage and sorting areas (Photo 1), a double walled above ground fuel storage tank (Photo 2), used oil and other fluids stored in a roofed structure and on secondary containment pallets (Photo 3), a vehicle parking area with Best Management Practices (BMPs) to control runoff (Photo 4), and a car fluid removal area under another roofed structure (Photos 13-16). We observed several stormwater inlets all with the same BMPs consisting of spill absorbant socks and hay bales (Photo 5). We also observed a large area with standing water from facility dust suppression watering. Part of this area was draining off site from two outfalls not listed in the facility's SWPPP (Photos 6-10, NOPF #1). The drainage area did not contain any stored materials, however the first unidentified outfall showed signs of sediment leaving the site (Photo 9). During the walkthrough an unknown oily substance presumed to be creosote was seen seeping from railroad ties withing the facility (Photos 11 and 12). Stormwater that comes into contact with this substance has a potential to leave the site (NOPF #2).

After the Facility walkthrough, I discussed my preliminary observations of the Facility. I held a formal exit meeting with the Facility Team. I informed Ms. Dehoney that I will issue a Notice of Preliminary Findings (NOPF) (Attachment 9) via email. I also informed Ms. Dehoney that I would communicate to her deficiencies that I may find upon my return to the office. The Facility chose not to claim any confidential business information (Attachment 8).

Facility Description

Advantage Metals Recyling Cheyenne facility (Facility) is a scrap metal processing facility. This facility accepts scrap from the public as well as industrial suppliers. This scrap includes appliances, transformers, propane cylinders, aerosol cans, drums, storage tanks and vehicles. The Cheyenne facility inspects, sorts, and processes this scrap for transportation to either additional processing facilities like the Advantage Metals Recycling 12th Street Shredder or other end use customers. Processing may include cutting scrap which is too large to transport effectively or too

large for a shredder or kiln. When the facility receives scrap which contains fuels or refrigerants, these are drained on-site at either the vehicle drainage rack or the refrigerant recovery stand.

The Facility is located on a 13.3-acre property, in an industrial use area, 620 feet northwest of the Kansas River, southeast of the intersection of Cheyenne Avenue and Packard Street. The facility includes an administrative office, warehouse, shop and a nonferrous warehouse. Nonferrous materials are brought in and stored inside the nonferrous warehouse, while ferrous materials are stored outdoors.

Aboveground storage tanks located at the Facility are for diesel and gasoline fuel storage to fuel the equipment. Fuel tanks along with used oil, motor oil, and hydraulic oil containers are covered under a Spill Prevention, Control, and Countermeasures Plan (SPCC) (Attachment 11).

The western half and northern portion of the site is mostly impervious surface. Stormwater flows into stormwater conveyances on the property and ultimately discharges from Outfall 001 on the east side of the facility. From the Outfall point, the water flows into a city storm sewer which flows approximately 620 feet to the Kansas River.

Site Drainage Patterns

Based on the local topography of the site and drainage description provided and indicated on the site plan included in the SWPPP, overall, the Facility is sloped allowing stormwater to sheet flow into stormwater inlets that lead to Outfall 001. However, while onsite during the inspection, dust prevention water was seen discharging from two locations on the North/Northeast side of the facility. Figure 1 is the drainage pattern map located in the facility's SWPPP.

Figure 1: Advantage Metals Recycling LLC – Cheyenne SWPPP Drainage patterns map.



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Figure 2 shows the drainage areas observed discharging to the two unidentified outfalls. This area was free from stored materials but was watered with dust prevention water from the facility.

This water was then observed leaving the site from the two unidentified outfalls. Figure 2 also shows the area where an unknown substance was seeping out of the railroad ties, along with the potential drainage path.

Figure 2: Map showing locations of findings on NOPF.



Findings and Observations

All findings and observations of this inspection concern the Facility's status of compliance with the requirements of the NPDES permit. These findings are based on my interviews with Facility personnel, my review of records provided to me by Facility personnel, and my visual observations of the site. All field observations were discussed in detail with Facility personnel throughout the inspection and during the formal exit meeting on June 22, 2023. Photos taken during the inspection on June 22, 2023, are included in Attachment 10 along with the associated photo log.

1. Structural controls on site appeared to be maintained. Among others, these include the absorbent socks and hay bales around the inlets, and the secondary containment of used lubricants.
2. Facility personnel appeared knowledgeable of stormwater management and non-structural controls also appeared adequate. Those included implementation of the SWPPP, monthly site inspections (Attachment 4), periodic visual assessment of stormwater quality at the outfalls (Attachment 5), comprehensive stormwater inspections (Attachment 6), and employee training (Attachment 7).
3. During my walkthrough with Facility personnel, we looked at Outfall 001. There was a small

amount of discharge through Outfall 1 with no evidence of oil sheen residue (Photo 17).

4. During my visual inspection of the site, I observed two unidentified outfalls on the north side of the facility (Photos 6-10). There was no stored material in the area surrounding these outfalls, however, dust suppression water was seen draining from the facility out of these outfalls. Since these outfalls were not listed in the SWPPP, I issued NOPF #1 for unidentified outfalls.
5. I observed an unknown substance presumed to be creosote seeping from railroad ties in the northeast section of the facility (Photos 11 and 12). This substance is exposed to stormwater and has a potential to run offsite. Therefore, I issued NOPF #2.
6. While reviewing the SWPPP after the inspection it was observed that the site map showing the drainage patterns of the facility it not accurate for the northeastern section of the facility as shown in Figure 2.

Facility Response to NOPF

On July 12, 2023, the facility sent the signed copy of the NOPF with the following response.

“During the inspection we pointed out that the residue around the railroad ties was creosote not oil. Creosote is a tar like pesticide compound approved by EPA for treating railroad ties. It is common for creosote treated railroad ties to seep this thick compound (especially soon after they are manufactured and treated). We find this seeped material is only mobile at extreme summer temperature when heated by direct sunlight. The railroad ties in question were recently purchased and installed on a rail repair project.”

“The NOPF includes a potential finding of two outfalls not listed in the SWPPP. During the inspection, it was noted that the area was a driveway and did not have material processing in the area. The areas in question are not associated with industrial activity and provide only non-industrial stormwater in the form of sheet flow and would not be classified as an outfall. The water observed on the day of the inspection was an allowable discharge of potable water used for dust suppression according to the general permit for the facility.”

Conclusion

Overall, structural controls appeared to be installed correctly, and records indicated that non-structural controls appeared adequate as well. However, the site needs to update their SWPPP site map to show proper drainage patterns and look into the substance seeping from the railroad ties.

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Date: 2023.08.22 08:51:18 -05'00'

Adam Hendrickson

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Nicole Moran

Physical Scientist, WB/DWIS

Section Chief, WB/DWIS

ATTACHMENTS

1. R7 ISW Checklist
2. NPDES Permit
3. SWPPP
4. Periodic site inspections
5. Periodic Visual assessment
6. Comprehensive SWPPP inspection
7. Training records
8. NOPF
9. Site photos
10. SPCC Plan