UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

SUBJECT:	CLEAN WATER ACT INSPECTION REPORT Padnos – Holland, Holland, Michigan
FROM:	Jason Hewitt, Environmental Engineer Water Enforcement Branch, Section 1
THRU:	Molly Smith, Section Supervisor Water Enforcement Branch, Section 1
TO:	File

BASIC INFORMATION

Facility Name: Padnos-Holland

Facility Location: 185 West 8th Street, Holland, Michigan 49423

NPDES Permit Number: MIS220053

Facility Type: Metal Recycler

Date of Inspection: September 13, 2022

EPA Inspector(s):

1. Jason Hewitt, Environmental Engineer
2. Cher Benisek, Physical Scientist
3. Lee Crank, Life Scientist
4. Betsy Nightingale, Life Scientist
5. Jackie Cole, Life Scientist
6. Lauren McCarrell, Life Scientist

Other Attendees:

1. Ryan Grant, Environmental Quality Specialist, MEGLE
2. Jonathan Vruggink, Environmental Quality Analyst, MEGLE
3. Tim Driesenga, OPS Manager, Padnos
4. Josh Shaw, Director of Manufacturing, Padnos
5. Chad Ignatowski, EHS Director, Padnos

6. Zack Durham, Environmental Manager, Padnos
7. Rob McCormick, Environmental Specialist, Padnos
8. Todd Jousma, Production Manager, Padnos

Contact Email Address: ChadIG@padnos.com

Inspection Type: Industrial Stormwater

Facility Notification:
☐ Unannounced Inspection
☒ Announced Inspection

Regulations Relevant to Inspection: NPDES Permit Requirements at 40 CFR 122.26 and Section 402.

Arrival Time: **8:30 AM EST**
Departure Time: **3:30 PM EAST**

OPENING CONFERENCE

☒ Presented Credentials
☒ Stated authority and purpose of inspection
☐ Provided Small Business Resource Information
☒ Small Business Resource Information Sheet not provided. Reason: Not a small business
☒ Provided CBI warning to facility

The following information was obtained through document review and verbally from facility representatives unless otherwise noted.

Process Description:

Padnos–Holland Division is a recycler of ferrous and non-ferrous metals. The site employs a shredder, Shear and Hot Briquetter for processing ferrous metals and a processing and storage area for non-ferrous metals. This site also has maintenance areas for repairs of heavy equipment and trucks and trailers. The facility has coverage under the Michigan Industrial Stormwater Special Use General Permit MIS220000, with the certificate of coverage individual permit number as MIS220053. The primary SIC code of the facility is 5093. The facility discharges to the Macatawa River, which has a Total Maximum Daily Load (TMDL) for Total Phosphorus.

Staff Interview(s): Padnos-Holland (Padnos) was started in 1905 and is currently in the 4th generation of family-owned management. Padnos takes in scrap from recycling centers in two types, industrial scrap (from manufacturing of new products) and post-consumer scrap. The facility receives scrap via truckload, roll offs, luggers, dumps etc. The truck scale serves as the cash register. Once material is weighed in, they begin an inspection process, break up the materials by value, grade, and use: shredder, shear, briquetter. At the scale is a radiation

detector, which very seldom picks up anything, but if it does the facility will not accept it. The consumers of Padnos end product are mills and foundries.

The shredder is used primarily for sheet iron and auto bodies. Industrial scrap is usually unprocessed. Auto bodies have the chlorofluorocarbons removed, fluids removed, batteries removed, all before coming to the facility, this is done at the recycling facilities where the vehicles are received, not at Padnos-Holland. At Padnos, the removals are verified on-site via a sticker that has the transit number or vin number so the employees can track where it was processed. Crane operators are required to check the stickers. Any "fluff or fuzz" (car seats, fabrics, textiles) is sent to Ottawa Farms Landfill. While waiting to be sent off-site these materials are stored in concrete bins where all water is captured and sent to an onsite wastewater treatment plant (WWTP) and then discharged to the City of Holland, Michigan. The site has no pretreatment permit.

Padnos employs 31 operations employees, and about 75 total employees, if including truck drivers and support. Padnos operational hours are 7am to 5pm, Monday-Friday. The facility is approximately 29 acres.

The facility is broken into two yards, East and West, with Pine Avenue being the point of demarcation. Everything in the West Yard goes to the WWTP. Curb drains go to stormwater catch basins and lift stations, which are sent to grit chambers, then a retention tank, and then the WWTP. Water from the truck washing pads also goes to the WWTP. Some water from the WWTP is recirculated to cooling water at the briquetter, and everything else goes to the sanitary system. In the East Yard, near the bailer, stormwater is collected and goes through a grit chamber, then an oil/water separator, and then to a storm drain, which, along with the rest of the East Yard, goes to the MS4 or Lake Macatawa. The grit chambers are cleaned once or twice a year, dewatered on the turnings pad, and then sent through the briquetter.

The site has 8 total stormwater discharge points. Padnos takes benchmark samples themselves and drives them to ALS Labs to analyze the sample. A small amount of hazardous waste is generated at the facility, in the form of mineral spirits. Padnos does have a rail line and ships out approximately 40 cars per month and receives approximately 6 cars per year. Padnos also ships out via barge, during shipping season, approximately 25-30 barges per year, which are loaded via crane, transported loose, and unloaded loose at steel mills.

Facility Walk-Through Occurred: Yes

Data Collected and Observations:

At approximately 10:55AM EST the inspection group and Padnos representatives entered the West Yard at the truck scale. Discharge point 8 is the location for benchmark sampling. Padnos cannot always obtain a sample for all discharge points, but will do visual inspections at the same time. The facility will do dust suppression when needed. All piles in the West Yard are pre-staged to be loaded onto a barge. The nearby waterway is protected via grade and a large berm. The facility has a street sweeper contracted, and due to their location acknowledges the need to be a good neighbor to the downtown community, and runs the street sweeper, as needed, to meet

those goals. In the East Yard, the oil/water seperator was originally installed to catch leaks from the bailer, but as the bailer is not used as frequently. The bailer now serves predominantly for settling, and at this time, only dry turnings are held at the east side, which leads to it having much less activity. The grit chamber from the oil/water separator is cleaned twice a year. All material built up at filters/BMPs are sent to landfills.

Ended field tour at 12:15pm EST.

Photos and/or Videos: were taken during the inspection. See Photo Log, Attachment A.

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

On-site beginning at 1:35pm EST, Jason Hewitt (EPA) and Ryan Grant (MEGLE) reviewed records on-site.

1. Inspection reports over the last 2 years: Padnos does all inspections in a software application - Velocity. If there is a finding within the inspection report, the finding then gets assigned and routed to an individual. Padnos uses Velocity for bi-weekly stormwater inspections, and when an issue is assigned to someone in the yard, if they have further issues or findings they can reroute it to another individual or program if needed. Due to the success of using Velocity for permit required bi-weekly stormwater inspections, Padnos uses it for other media and issues as well. Padnos has been using Velocity for the last 2 years, and the software has been helpful in developing annual reports or looking back at past actions as it allows for report and data pulls. Also, reviewed documentation on the compliance with the requirements in the Special-Use section of the General Permit with Velocity.
2. Comprehensive Benchmark and Visual Inspections over the last 2 years: Padnos also uses Velocity for these reports. EPA inspectors verified that the reports are being signed off by a qualified person. Inspections show that Padnos is finding and fixing issues in a timely fashion, example noted: labeling drums in the yard. Padnos can also assign tasks and attach word documents with certified operators' credentials to reports. Also reviewed 2021 report and found no issues.
3. Permit and Stormwater Pollution Prevention Plan (SWPPP) documentation: Padnos will send SWPPP to EPA Region 5 inspector via email, and MEGLE inspector verified that the facility was up to date on all required documentation for Permit and SWPPP annual review.
4. Annual Records: Padnos provided up to date stormwater training records, 2022 to date stormwater sampling records, and annual safety training records. Additionally, Padnos has developed, and had approved by the state, its own stormwater safety presentation, which can be given at any time to new employees or for recertification purposes and satisfies the SWPPP requirement. Padnos has a database that shows who has taken and who needs to take the training.

Ended document review at 2:20pm EST.

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility
☒ Confirm CBI status at end of closing conference

Requested documents:

- SWPPP + Certification Statement
- SWPPP and Outfall Map

Areas of Concern:

1. As detailed in the opening conference, and shown in Attachment A: Photolog Image 4, material piles are stored loose in the west yard adjacent to Lake Macatawa and loaded onto barge via crane. It would be expected that during this operation some materials may enter the waterway through this process.
2. Rock present in the East Yard during the inspection appeared to be relatively fresh, with little evidence of sediment or fluid buildup, indicating that these BMPs were refreshed relatively recently.
3. As evident in Attachment A: Photolog Image 10, there appears to be significant drainage visible by the oil sheen at the base of the bailer. Based on this observation, as per Permit MIS220000 Part I.C.4., this would be an area to introduce additional structural controls.

SIGNATURES

Report Date is date of Section Supervisor signature.

X JASON HEWITT
Digitally signed by JASON HEWITT
Date: 2022.11.02 10:43:13 -05'00'
Report Author

X MOLLY SMITH
Digitally signed by MOLLY SMITH
Date: 2022.11.01 16:27:32 -05'00'
Section Chief

APPENDICES AND ATTACHMENTS

1. Attachment A: Photolog