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

for

Name of Facility: United Iron & Metal, West
Facility Address: 909 Millington Ave, Baltimore, MD, 21223
Mailing Address: 909 Millington Ave, Baltimore, MD, 21223

Report Prepared on: 1/7/2022 By: _____, Environmental Scientist (PG Environmental)
Date *Signature*

Report Final as of: _____ By: Gold, Peter Digitally signed by Gold, Peter Date: 2022.01.10 09:28:19 -05'00', EPA
Date *Signature*

General Information

Type of Inspection:	Industrial Stormwater
Owner:	Atlantic Recycling Group
Operator:	Atlantic Recycling Group
Permittee:	United Iron & Metal, LLC
NPDES Permit No:	MDR001216
NPDES Permit Effective Date:	January 1, 2014
NPDES Permit Expiration Date:	December 31, 2018 (administratively extended)
Receiving Water/MS4:	Gwynns Falls (tributary to the Patapsco River), Baltimore City MS4 located along South Catherine Street
Latitude and Longitude:	39.27792, -76.65566

On-Site Facility Inspection Overview

On November 16, 2021, a representative from U.S. Environmental Protection Agency (EPA) Region III and EPA's contractor, PG Environmental (hereinafter, the EPA Inspection Team), conducted a compliance evaluation inspection at United Iron & Metal, West, in Baltimore, Maryland. United Iron & Metal, LLC is identified as the Permittee, and its parent company, Atlantic Recycling Group, owns and operates the Facility. Two representatives from the Maryland Department of the Environment (MDE) also attended the inspection.

Approximate Entry Time: 8:30 AM (EST) **Approximate Exit Time:** 11:00 AM (EST)

Unique Project Identifier (UPI): 3E22WN024A

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I. INTRODUCTION

On November 16, 2021, a representative from U.S. Environmental Protection Agency (EPA) Region III and EPA's contractor, PG Environmental (hereinafter, the EPA Inspection Team), conducted a compliance evaluation inspection at United Iron & Metal, West, in Baltimore, Maryland (Facility). United Iron & Metal, LLC (UIM) is identified as the Permittee, and its parent company, Atlantic Recycling Group, owns and operates the Facility. The EPA Inspection Team was joined on the inspection by representatives from the Maryland Department of the Environment (MDE). The purpose of the inspection was to assess the Permittee's compliance with MDE's National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Stormwater Associated with Industrial Activities (12-SW, Registration No. MDR001216; hereinafter, the Permit). The Facility is classified under Sector N of the Permit, Scrap Recycling and Waste Recycling Facility (Non-Source Separated, Nonliquid Recyclable Materials).

The Facility is a 26-acre scrap metal processing and recycling center. Most of the Facility is covered by concrete and compacted dirt and gravel, with a portion (mainly access roads) comprising impervious asphalt. Gwynns Falls runs along the southwestern perimeter of the site.

Ferrous and nonferrous scrap metal and small quantities of consumer-scale recyclables (cardboard, plastic bottles, aluminum) are brought into the Facility by commercial haulers and the general public and then separated based on type. A large portion of the scrap is processed via the Facility's hammer mill shredder. The shredder system processes and sorts scrap into a usable/shippable form and allows the non-recyclable auto shredder residue (ASR), or "fluff," to be sorted out. The ASR material is the non-metallic waste stream from the shredder process (plastic, foam, paper, etc.). Facility representatives stated that ASR is hauled to a landfill as needed. Large piles of pre-processed scrap, shredded scrap, and ASR were observed staged throughout the site.

UIM maintains a fleet of vehicles and equipment onsite used for collecting and processing scrap. The Facility has a maintenance garage building for vehicle and equipment maintenance as well as a vehicle washdown pad that drains to an underground storage tank (UST).

The Facility has two mapped outfalls. Outfall No. 001 discharges runoff collected from drains around the Facility that flow into a retention pond (referred to as the "Stormwater Pond") in the south part of the Facility. Outfall No. 001 discharges to Gwynns Falls located along the southwestern perimeter of the Facility.

Outfall No. 002 is a piped outfall from a retention pond located in the northeast portion of the site (referred to as the "Retention Pond"). The Retention Pond collects sheet flow runoff from the northern areas of the Facility, including the Catherine Street entrance and the employee parking lot. Outfall No. 002 discharges to Catherine Street and into the Baltimore City Municipal Separate Storm Sewer System (MS4); however, Facility representatives explained the outfall never discharges as there is more than enough capacity in the Retention Pond for the amount of runoff it receives. A review of data included in EPA's Integrated Compliance Information System database indicated Outfall No. 002 discharged in the fourth quarter of 2018 and first quarter of 2019, but not since that time. Refer to the *Summary of Observations* section below for additional details.

II. INSPECTION PROCESS

Inspection Opening Conference

The EPA Inspection Team arrived at the Facility at 8:30 AM (EST) for the inspection. Mr. Jake Albright of PG Environmental displayed his Clean Water Act inspector credential to Facility representatives at the outset of the inspection and explained that the purpose of the inspection was to observe compliance with the Permit. 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 and Representatives			
Jake Albright	PG Environmental	(703) 956-1957	Jake.Albright@pgenv.com
Kate Forsmark	PG Environmental	(352) 262-9910	Kate.Forsmark@pgenv.com
Mike Greenwald	EPA Region III	(215) 814-2398	Greenwald.Michael@epa.gov
Maryland Department of the Environment			
Joe Miller	MDE	(410) 537-3506	joseph.miller1@maryland.gov
Wendy Huang	MDE	(410) 537-3526	wendy.huang@maryland.gov
Facility Representative			
Cristal Cole, Business Compliance Manager	United Iron & Metal	(301) 315-1528	ccole@scraparg.com
Joe Lipira, Operations Manager	United Iron & Metal	-	-

Weather and Precipitation Conditions

During the inspection, the weather was sunny and cool. 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 2, below.

Table 2. Precipitation Data

Station Name	Date	Precipitation Amount (inches)[1]
Cylburn Park, MD US	11/11/2021	0.00
Cylburn Park, MD US	11/12/2021	0.99
Cylburn Park, MD US	11/13/2021	0.02
Cylburn Park, MD US	11/14/2021	0.00
Cylburn Park, MD US	11/15/2021	0.00
Cylburn Park, MD US	11/16/2021	0.00

Facility Site Walk

As part of the inspection process, the EPA Inspection Team visually observed the site conditions in the presence of the Facility representatives. The primary purpose of the inspection was to review industrial

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

processes and stormwater management at the Facility, the accuracy and reliability of the Permittee's self-monitoring and reporting program, and to obtain information that will assist EPA in assessing the Permittee's compliance with Permit requirements.

Photographs were taken during the inspection by Mr. Jake Albright (PG Environmental). Photographs used to support the observations in this report are included in Appendix A, Photograph Log. Photographs not used are kept on file at EPA Region III. Documents used to support the observations in this report are included in Appendix B, Exhibit Log.

The EPA Inspection Team began the walk-through at the Facility entrance located on the northern perimeter of the site, at the end of Millington Ave (refer to Appendix A, Photograph 2). The EPA Inspection Team observed piles of hauled in scrap, separated based on type, stored throughout the central portion of the site, that were awaiting processing (e.g., shredding). The EPA Inspection Team observed the Retention Pond in the northeast corner of yard with an outfall on the east side with a pipe that would discharge to the east (i.e., Outfall No. 002 to Catherine Street and the Baltimore City MS4; refer to Appendix A, Photographs 3 and 4). The outfall was adjacent to the Catherine Street customer entrance.

The EPA Inspection Team then proceeded back towards the Millington Avenue entrance to the non-ferrous building which was used to store electronics and batteries to be transferred out of the Facility. Copper material is also stored in this building (refer to Appendix A, Photograph 6). From the non-ferrous building, the EPA Inspection Team walked west to the weld shop and vehicle maintenance garage. In the northwest corner of the property, the EPA Inspection Team observed an asphalt berm to divert runoff from the north with a small "restoration area" on the south of the berm (refer to Appendix A, Photograph 9). The EPA Inspection Team observed a corrugated metal pipe in the southwest corner of the restoration area. The Facility representatives did not know the exact discharge location of the pipe, but stated that it may be connected to the sanitary sewer (refer to Appendix A, Photograph 10).

Within the vehicle maintenance garage area, the EPA Inspection Team observed multiple garage bays for indoor vehicle and equipment maintenance with heavy equipment stored inside and outside of the building (refer to Appendix A, Photograph 11). The EPA Inspection Team observed what appeared to be petroleum staining on the ground outside the maintenance shop, along the north side of the building, (refer to Appendix A, Photographs 12 and 14). To the northeast of the building, was a drain that was connected to an underground storage tank (UST) that was reportedly pumped out regularly (refer to Appendix A, Photographs 15 through 17). Just south of the UST was a trench drain that was observed to be plugged with sediment and was reported by the Operations Manager not to discharge anywhere (refer to Appendix A, Photograph 18).

The EPA Inspection Team continued through the central portion of the Facility, observing various scrap storage areas. While walking through the Facility, the EPA Inspection Team observed sheet flow from the regularly occurring dust control operations. The sheet flow was observed to have a sheen (refer to Appendix A, Photograph 20). The EPA Inspection Team then observed a 10,000-gallon diesel aboveground storage tank (AST) used to fuel equipment at the Facility (refer to Appendix A, Photographs 21 and 22). The AST was observed to have secondary containment and a spill kit (refer to Appendix A, Photograph 23). It was unclear whether the tank was double-walled.

The EPA Inspection Team continued the inspection within the Facility's retail area, located near the entrance in the central-eastern part of the site (refer to Appendix A, Photographs 21 through 26). The EPA Inspection Team observed scrap piles generated mostly from smaller private haulers and residential customers. Catch basins that collected runoff to be conveyed to the Stormwater Pond and Outfall No. 001 were located in the area.

The EPA Inspection Team then observed a drain under a platform storing processed material in the south-central portion of the Facility. A rock barrier was installed at the mouth of the drain, which flowed to the Stormwater Pond (refer to Appendix A, Photographs 24 through 27). From here the EPA Inspection Team

observed an additional drain to the north of the shredder which also flowed to the Stormwater Pond (refer to Appendix A, Photograph 29).

Next, the EPA Inspection Team observed the area around the shredder, located in the southwest corner of the Facility. Ponding of stormwater was observed in multiple areas around the shredder (refer to Appendix A, Photograph 30). Within the area of the shredder, a pit was observed for stormwater to be used for process water for the shredder (refer to Appendix A, Photograph 31). Facility representatives stated that the water is continuously recycled through the shredder system and no water is discharged to the Stormwater Pond. Fluff debris from the shredder were observed on top of the water in the pit. A pool skimmer was observed next to the pit and Facility representatives informed the EPA Inspection Team that the skimmer was used to clean debris off of the water.

The EPA Inspection Team then observed the Stormwater Pond located on the southern corner of the Facility which collects stormwater and receives water from the drains around the Facility (refer to Appendix A, Photographs 35 and 36). Water from the pond is reportedly pumped out and used as process water for the shredder and trucks. Discharge from the pond goes to Outfall No. 001 the southwest of the Facility into Gwynns Falls (refer to Appendix A, Photographs 41 through 45). The EPA Inspection Team concluded the Facility walkthrough at the Facility's main office.

Additional details related to the site conditions at the time of the inspection are included in the *Summary of Observations* section below.

Records Review

The EPA Inspection Team conducted a records review to evaluate the Permittee's compliance with the Permit. The Facility's SWPPP was available and partially reviewed onsite, as well as provided digitally after the inspection (refer to Appendix B, Exhibits 1 and 2); however, the remainder of the document review was conducted offsite. The following documents were reviewed:

- EPA ICIS Database DMR Data (January 1, 2018 – September30, 2021)
- Facility SWPPP (prepared May 4, 2018 and updated January 3, 2019)
- SWPPP Appendix D – Chesapeake Bay Restoration Requirement Plans
- Chesapeake Bay Restoration Requirements Completion Report (2019)
- Annual Comprehensive Inspection (Q4 2019 – Q3 2020)
- Monthly Maintenance and Inspection Reports (January 2021 through November 2021)
- Sweeping Log 2021 (September 9, 2021 through November 16, 2021)
- Quarterly Inspection and Benchmark Monitoring Reports (April 2021 through September 2021)

Summary of Observations

The following section summarizes the EPA Inspection Team's observations relative to the Permit requirements.

Benchmark Monitoring

Part V.B.1 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."

PARAMETER	Benchmark	Units	Frequency	Sample Type
Chemical Oxygen Demand (COD)	120	mg/L	1/quarter	Grab
Total Suspended Solids (TSS)	100	mg/L	1/quarter	Grab
Total Recoverable Aluminum	0.75	mg/L	1/quarter	Grab
Total Recoverable Iron	1.0	mg/L	1/quarter	Grab
Total Lead[1]	0.082	mg/L	1/quarter	Grab
Total Zinc[1]	0.12	mg/L	1/quarter	Grab
Total Copper[1]	0. 014	mg/L	1/quarter	Grab

[1] The benchmark values of some metals are dependent on water hardness. For these parameters, you must determine the hardness of the receiving water per Appendix C.

Figure 1. Sector N Benchmark Monitoring Requirements.

Observation 1. The Facility experienced benchmark exceedances for multiple parameters 60 times between January 1, 2018 and September 30, 2021 (42 from Outfall No. 001 and 18 from Outfall No. 002). The EPA Inspection Team reviewed monitoring data provided by the Permittee for Quarters 1 through 3 of 2021 (refer to Appendix B, Exhibit 3) as well as data contained in EPA's ICIS database, dating back to January 1, 2018 (refer to Appendix B, Exhibit 4). Benchmark exceedances are summarized in Table 3 and Table 4.

Table 3. Reported Benchmark Exceedances for Outfall No. 001 (January 1, 2018 through September 30, 2021)

Monitoring Period End	Outfall	Parameter	Reported Value	Benchmark Value	Units
09/30/2021	001	COD	136	120	mg/L
09/30/2021	001	Al	0.7903	0.75	mg/L
09/30/2021	001	Pb	0.0974	0.082	mg/L
09/30/2021	001	Zn	0.6397	0.12	mg/L
09/30/2021	001	Cu	0.1514	0.014	mg/L
09/30/2021	001	Fe	3.446	1.0	mg/L
06/302021	001	COD	135	120	mg/L
03/31/2021	001	COD	263	120	mg/L
03/31/2021	001	Fe	1.711	1.0	mg/L
03/31/2021	001	Zn	0.4503	0.12	mg/L
03/31/2021	001	Cu	0.0477	0.014	mg/L
12/31/2020	001	COD	135	120	mg/L
12/31/2020	001	Cu	0.108	0.014	mg/L
12/31/2020	001	Al	0.91	0.75	mg/L

Monitoring Period End	Outfall	Parameter	Reported Value	Benchmark Value	Units
12/31/2020	001	Fe	2.541	1.0	mg/L
12/31/2020	001	Pb	0.14	0.082	mg/L
12/31/2020	001	Zn	0.839	0.12	mg/L
09/30/2020	001	Cu	0.035	0.014	mg/L
09/30/2020	001	Al	0.7903	0.75	mg/L
09/30/2020	001	Zn	0.361	0.12	mg/L
06/30/2020	001	Cu	0.08	0.014	mg/L
06/30/2020	001	Al	1.2	0.75	mg/L
06/30/2020	001	Fe	1.22	1.0	mg/L
06/30/2020	001	Pb	0.111	0.082	mg/L
06/30/2020	001	Zn	0.85	0.12	mg/L
03/31/2020	001	COD	136	120	mg/L
03/31/2020	001	Al	0.875	0.75	mg/L
03/31/2020	001	Cu	0.08	0.014	mg/L
03/31/2020	001	Fe	2.08	1.0	mg/L
03/31/2020	001	Zn	0.77	0.12	mg/L
12/31/2019	001	Cu	0.0182	0.014	mg/L
12/31/2019	001	Zn	0.33	0.12	mg/L
03/31/2019	001	COD	226	120	mg/L
03/31/2019	001	Cu	0.037	0.014	mg/L
03/31/2019	001	Zn	0.13	0.12	mg/L
12/31/2018	001	COD	137	120	mg/L
12/31/2018	001	Zn	0.3	0.12	mg/L
09/30/2018	001	COD	146	120	mg/L
09/30/2018	001	Zn	0.2	0.12	mg/L
06/30/2018	001	COD	201	120	mg/L
06/30/2018	001	Zn	0.29	0.12	mg/L
03/31/2018	001	Fe	1.49	1.0	mg/L

Table 4. Reported Benchmark Exceedances for Outfall No. 002 (January 1, 2018 through September 30, 2021)

Monitoring Period End	Outfall	Parameter	Reported Value	Benchmark Value	Units
03/31/2019	002	COD	136	120	mg/L
03/31/2019	002	Cu	1.13	0.014	mg/L
03/31/2019	002	TSS	1,574	100	mg/L
03/31/2019	002	Al	19.5	0.75	mg/L
03/31/2019	002	Fe	14.6	1.0	mg/L
03/31/2019	002	Pb	1.3	0.082	mg/L
03/31/2019	002	Zn	6.2	0.12	mg/L
12/31/2018	002	COD	136	120	mg/L
12/31/2018	002	Fe	4.03	1.0	mg/L
12/31/2018	002	Cu	0.0228	0.014	mg/L
12/31/2018	002	TSS	220	100	mg/L

Monitoring Period End	Outfall	Parameter	Reported Value	Benchmark Value	Units
12/31/2018	002	Al	1.12	0.75	mg/L
12/31/2018	002	Pb	0.161	0.082	mg/L
12/31/2018	002	Zn	0.56	0.12	mg/L
09/30/2018	002	Cu	0.016	0.014	mg/L
09/30/2018	002	TSS	113	100	mg/L
06/30/2018	002	TSS	265	100	mg/L
06/30/2018	002	Al	2.82	0.75	mg/L

Observation 2. EPA's Enforcement and Compliance History Online (ECHO) database indicates the Facility was in a state of significant noncompliance (SNC) between July 1, 2018 and June 30, 2020 for failure to report (refer to Appendix B, Exhibit 5). According EPA's ICIS Database, all DMRs had been submitted for the period of January 1, 2018 through September 30, 2021. However, data was not included for Outfall No. 002 for Q1 2018 and Outfall No. 002 data for Q2 appeared to have been submitted about three months late, on October 29, 2018 (refer to Appendix B, Exhibit 4).

Corrective Actions

Part IV.B.2 of the Permit states, if "the average of 4 quarterly sampling results exceeds an applicable benchmark. If less than 4 benchmark samples have been taken, but the results are such that an exceedence [sic] of the 4 quarter average is mathematically certain (i.e., if the sum of quarterly sample results to date is more than 4 times the benchmark level) this is considered a benchmark exceedence [sic], triggering this review;" the Permittee must review the selection, design, installation, and implementation of control measures to determine if modifications are necessary to meet the effluent limits in this permit.

Part IV.C of the Permit states, "You must document your discovery of any of the conditions listed in parts IV.A and IV.B within 24 hours of making such discovery. Subsequently, within 14 days of such discovery, you must document any corrective action(s) to be taken to eliminate or further investigate the deficiency, or if no corrective action is needed, the basis for that determination. Specific documentation required within 24 hours and 14 days is detailed in part IV.D. If you determine that changes are necessary following your review, any modifications to your control measures must be made before the next storm event if possible, or as soon as practicable following that storm event. In the event that a deficiency cannot be addressed fully within 30 days, you must call the Department Compliance program and make the Department aware of the situation. These time intervals are not grace periods, but are schedules considered reasonable for documenting your findings and for making repairs and improvements. They are included in this permit to ensure that the conditions prompting the need for these repairs and improvements are not allowed to persist indefinitely."

Observation 3. According to the reviewed DMR data, the Facility had multiple instances where the average of four quarterly sampling results exceeded applicable benchmarks, and corrective actions had not been documented or implemented. For example, for the most recently reported four-quarter period (Q4 2020 through Q3 2021), the following benchmarks were exceeded for Outfall No. 001 (four quarter average):

- COD (167.25 mg/L)
- Copper (0.079 mg/L)
- Iron (2.01 mg/L)
- Zinc (0.50 mg/L)

Additionally, the Facility's 2020 Comprehensive Annual Inspection Report documents four-quarter average benchmark exceedances for the following parameters for Q4 2019 through Q3 2020 (refer to Appendix B, Exhibit 6):

- Copper (0.053 mg/L)
- Iron (1.25 mg/L)
- Zinc (0.58 mg/L)

The 2020 Comprehensive Annual Inspection Report states, "Outfall 001: There are various drains throughout the facility that direct runoff to this pond which overflows to Gwynns Falls via the riser structure. During any given rain event, the majority of the facility's runoff is retained in the pond and only a small volume is typically discharged via the riser. The drains that funnel to the pond are monitored and preventively maintained on as needed basis. **There are no corrective actions required at this outfall** [emphasis added]" (refer to Appendix B, Exhibit 6).

Outfall No. 002 had not discharged since 2019; however, monitoring during Q1 2019 resulted in benchmark exceedances for TSS, copper, aluminum, iron, lead, and zinc. All of these exceedances were more than four times higher than the benchmark concentration. Facility representatives stated workers will pick trash out of the pond periodically, but other routine maintenance on the BMP is not necessarily conducted.

The 2020 Comprehensive Annual Inspection Report states, "Outfall 002: This outfall is located at the overflow of the bioretention area that was constructed in Q4 2018. The area appeared fully vegetated during today's inspection. The retention area was built to retain all water that flows into it and, as such, there were no discharges at this outfall in recent quarters. **There are no corrective actions required at this outfall** [emphasis added]" (refer to Appendix B, Exhibit 6).

The Facility's SWPPP was documented as last updated on January 3, 2019, prior to the benchmark exceedances described above (refer to Appendix B, Exhibit 1).

Sector-specific BMPs

Part III.B of the Permit states that "the technology-based limits included in Part III.B.1 and in Appendix D, the term "minimize" means reduce and/or eliminate to the extent achievable using control measures (including best management practices) that are technologically available and economically practicable and achievable in light of best industry practice." Part III.B.1.b.vi of the Permit states the Permittee must "divert, infiltrate, reuse, contain, or otherwise reduce stormwater runoff, to minimize pollutants in your discharges."

Sector N of the Permit (Scrap Recycling and Waste Recycling Facilities) Part N.3.1.2. *Scrap and Waste Material Stockpiles and Storage (Outdoor)*, states "Minimize contact of stormwater runoff with stockpiled materials, processed materials, and nonrecyclable wastes." Control measures include "(a) permanent or semi-permanent covers; (b) sediment traps, vegetated swales and strips, catch basin filters, and sand filters to facilitate settling or filtering of pollutants; (c) dikes, berms, containment trenches, culverts, and surface grading to divert runoff from storage areas; (d) silt fencing/bio-logs; and (e) oil and water separators, sumps, and dry absorbents for areas where potential sources of residual fluids are stockpiled (e.g., automobile engine storage areas)."

Observation 4. As stated in Observation 3, the Facility has routinely experienced benchmark exceedances for multiple parameters. The EPA Inspection Team observed stockpiled materials such as pre- and post-process rusted metals and processed ASR/fluff throughout the Facility, which were exposed to stormwater (refer to Appendix A, Photographs 8, 19, 28, 32, 34, and 38). The EPA Inspection Team observed that the Facility's primary BMP was to capture all runoff in one of two ponds onsite, both of which had the potential to discharge; Outfall No. 001 discharges most quarters (refer to Appendix A, Photograph 35).

Facility representatives explained that the Facility conducts street sweeping and inlet cleaning routinely. The EPA Inspection Team confirmed this was documented as completed through the records review.

Good Housekeeping

Part III.B.1.b.ii requires the Permittee to "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 5. The EPA Inspection Team observed what appeared to be petroleum staining to the north of the maintenance/vehicle area near the vehicle wash (refer to Appendix A, Photographs 11 through 15). According to the map in the Facility SWPPP, the area drains to the Stormwater Pond. The EPA Inspection Team also observed steel I-beams stored uncovered outside the south side of the weld shop (refer to Appendix A, Photograph 7).

Observation 6. The EPA Inspection Team observed sheen on runoff generated from the dust control water truck spraying the access roads (refer to Appendix A, Photograph 20). The sheen was observed flowing south, towards the Stormwater Pond. Sheen was also observed in at least two other locations that ultimately drain to the Stormwater Pond (refer to Appendix A, Photographs 25 and 28)

Part III.A.1.a of the Permit requires the Permittee to select, design, install and implement restoration of 20% of the untreated impervious surface area at your facility or equivalent control measures for the reduction of nutrients.

Observation 7. According to the Facility's Chesapeake Bay Restoration Requirements Completion Plan, the Atlantic Recycling Group has combined restoration requirements for all three of its facilities into a single treatment total of 7.25 acres (per MDE approval; refer to Appendix B, Exhibit 3). The EPA Inspection Team observed the three areas at the Facility that were described in the plan (refer to Appendix A, Photographs 3, 4, 9, and 46). According to the plan, the Facility is meeting its restoration goal through treatment in the Restoration Pond, conversion of two areas at the site from impervious to pervious surface (refer to Appendix A, Photographs 9 and 46), and street sweeping.

Closing Conference

At the conclusion of the onsite inspection, the EPA Inspection Team conducted a closing conference with the Facility Manager and shared preliminary observations. The EPA Inspection Team reiterated 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 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 11:00 AM (EST).