

UNPERMITTED INDUSTRIAL FACILITY STORMWATER INSPECTION CHECKLIST

Inspection Date	May 17, 2024	
Time	Entry: 9:15 AM	Exit: 10:00 AM
Weather Conditions	75 F° and sunny	
Media/Program	Water – CWA § 301, 402 – Industrial SW/NEC	
Operator Name:	JCV Recycling	
Facility or Site Name:	JCV Recycling	
Permit ID or Tracking #:	N/A; No permit at the time of the inspection	
SIC Code:	5093 - Scrap and Waste Materials	
Facility Address:	2400 Hopper Road	
(city, state, zip code)	Houston, TX 77093	
Geographic Coordinates:	29.879283°, -95.348583°	
Mailing address:	2400 Hopper Road	
(city, state, zip code)	Houston, TX 77093	
County:	Harris County	
Regular Days/Hours of Operation:	8:00 AM – 7:00 PM (Monday – Friday), 8:00 AM – 5:30 PM (Saturday); Closed (Sunday)	
# of Employees at location:	4	
Size of Facility (in acres):	Approximately 0.4 acres total with approximately 0.34 acres of outdoor activity	
Receiving Water(s):	The closest surface waterbody, according to the Texas Commission on Environmental Quality's (TCEQ) Surface Water Quality Segments Viewer is Halls Bayou located approximately 0.28 miles east of the Facility. The closest receiving waterbody, the stormwater conveyance running along the Facilities western perimeter, is the Houston MS4.	
Date facility est. @ location:	2019	
Onsite Representatives:		
Name: Jose Vasquez	Title: Owner	Phone: (713) 933-4647
	Email: scrapmetal_jcv@hotmail.com	
Authorized Official:	Contacted? ☒ Yes ☐ No	
Name: Jose Vasquez	Title: Owner	Phone: (713) 933-4647
	Email: scrapmetal_jcv@hotmail.com	
Additional Personnel Participating in Inspection:		
Name: N/A	Title: N/A	
Inspector(s):	Title:	Company:
Taylor Fontaine	Lead Inspector	Eastern Research Group, Inc.
Mariah Papac	Inspector	Eastern Research Group, Inc.
Ivy Koberlein	Inspector	Environmental Protection Agency, Headquarters
Sharron Crayton	Inspector	Environmental Protection Agency, Region 6
Inspection Report Author:		

Name: Mariah Papac	Signature: 	Date: June 4, 2024
Supervisor Review:		
Name:	Signature: 	Date: 07/10/2024

SECTION I – INTRODUCTION

Purpose of the Inspection

The purpose of the inspection was to determine compliance with the industrial stormwater requirements under §§ 301 and 402(p) of the Clean Water Act (CWA) and its implementing regulations found at 40 Code of Federal Regulations (CFR) Part 122.26. The inspection was unannounced and consisted of interviewing facility representatives, recording field observations, and taking photographs to document site conditions throughout the facility at the time of the inspection.

Opening Conference

- 1) Brief narrative documenting those present, introductions, presentation of credentials, and explanation of the purpose of the inspection.

On May 17, 2024, a U.S. Environmental Protection Agency (EPA) contractor, Eastern Research Group, Inc. (ERG), conducted an industrial stormwater non-filer inspection at JCV Recycling located in Houston, Texas (Facility). Ivy Koberlein of EPA Headquarters, Sharron Crayton of EPA Region 6, and Taylor Fontaine and Mariah Papac of ERG (collectively, EPA Inspection Team) met with the Facility representative, Jose Vasquez. The EPA Inspection Team presented their credentials and explained that it was EPA's understanding that the Facility did not have an industrial stormwater permit. The EPA Inspection Team explained they were onsite to conduct a CWA stormwater inspection, which includes observing the current operations of the facility and assessing the potential for stormwater discharges from the Facility.

The weather at the time of the inspection was cloudy and approximately 75°F. According to precipitation data from the National Oceanic and Atmospheric Administration (NOAA)¹, the Houston, Texas area received 1.16 inches of rain the day prior to the inspection and 0.01 inches of rain the day of the inspection.

- 2) Credentials presented to: Jose Vasquez
- 3) Facility acknowledged receiving previous outreach materials or correspondence on Permit requirements? "Yes x No Describe: N/A
- 4) Facility has been individually notified by permit authority or EPA that it is subject to stormwater requirements? "Yes x No Describe: N/A

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

FACILITY'S OPERATION & PRODUCT DESCRIPTION
Description of business and industrial activities occurring throughout the site. (Include operator's description and note any documentation that further establishes SIC code (permit applications, reports, business registries, website...)). JCV Recycling is a scrap metal recycling facility. The Facility accepts ferrous and nonferrous metals including but not limited to vehicles and vehicle parts, appliances, and cables, as well as used batteries and car parts from commercial and public sources. Materials are sorted, processed, and sold as scrap to commercial and public customers. Other industrial facilities owned/operated by same business entity? Yes ☒ No ☐ Describe: N/A

SECTION II – OBSERVATIONS

SITE EVALUATION	
Pollutant Sources	Note location, quantity/size, design issues, any operation and maintenance (O&M) deficiencies (including the nature and extent), potential pollutants, and evidence of exposure to stormwater. Are Best Management Practices (BMPs) in place to minimize or eliminate stormwater discharges from industrial activities?
Loading/Unloading Operations	The Facility unloads scrap metal from commercial and public sources in the northern portion of the Facility. Once sorted and processed, the products are placed under cover in cardboard boxes and on wooden pallets for customer pickup.
Industrial Manufacturing/Processing Operations	The Facility sorts the metals based on type (i.e., copper) and product (i.e., engines) for recycling. Materials containing fluids are drained, categorized, and sorted for customer pickup.
Industrial Machinery & Equipment Storage	The Facility has a forklift and an excavator for moving materials around the Facility. Equipment is located throughout the Facility [refer to Appendix B, Photograph Log (Photographs 10 and 19)].
Storage of Industrial Materials or Products	The Facility stores scrap metals throughout the property. Materials are stored in uncovered piles and are exposed to stormwater [refer to Appendix B, Photograph Log (Photographs 1 through 4, 8, 12, 18, 19, 21, and 22)].
Liquid Storage (e.g., Tanks, Liquid Storage Drums)	The Facility stores liquids drained from received vehicles and engines inside an enclosed shed. The EPA Inspection team observed sheen on pooled stormwater adjacent to the liquid storage shed [refer to Appendix B, Photograph Log (Photograph 4)].
Waste Storage/Disposal Areas (solid and/or hazardous)	The Facility has a solid waste dumpster for general solid waste [refer to Appendix B, Photograph Log (Photograph 22)].
Waste Treatment Facilities (e.g., Pretreatment Systems)	None observed or reported at the Facility.
Fueling Stations/Equipment	None observed or reported at the Facility.

SITE EVALUATION

Pollutant Sources	Note location, quantity/size, design issues, any operation and maintenance (O&M) deficiencies (including the nature and extent), potential pollutants, and evidence of exposure to stormwater. Are Best Management Practices (BMPs) in place to minimize or eliminate stormwater discharges from industrial activities?
Maintenance Areas & Cleaning Areas	
Sediment & Erosion Controls	The EPA Inspection Team observed that the ground surface throughout the Facility was partially paved [refer to <u>Appendix B, Photograph Log (Photographs 10 through 12, 15 through 17, and 19)</u>]. The perimeter areas, the southwestern corner, and the northern driveway area are gravel [refer to <u>Appendix B, Photograph Log (Photographs 1 through 5, 8, 9, 13, 17, 18, and 20 through 23)</u>].
Spills/Leaks Handling	The EPA Inspection Team observed discolored stormwater, sheens on pooled stormwater, and staining on the ground surface [refer to <u>Appendix B, Photograph Log (Photograph 4, 6, 9 through 12, and 15 through 17)</u>]. Spill kits were not observed or reported at the Facility.
Outside Shelters	“ Temporary (Date Established _____) ” Permanent None observed or reported at the facility.
Evidence of non-stormwater sources/discharges (allowable if permitted under MSGP)?	Evidence of non-stormwater sources/discharges was not observed during the inspection.
Evidence of process wastewater sources/discharges?	None observed.

OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS

Number and description of each potential Stormwater Discharge Point from the Facility	The EPA Inspection Team observed one (1) stormwater discharge point from the Facility: 1) The discharge point was along the western perimeter of the Facility behind the main building. The EPA Inspection Team observed a discrete stormwater pathway leading from the Facility under the fence along the western perimeter [refer to <u>Appendix B, Photograph Log (Photographs 7, 24, and 26 through 28)</u>]. 2) The flow pathway led to a Houston MS4 stormwater conveyance outside the Facility [refer to <u>Appendix B, Photograph Log (Photographs 24, 25, and 28 through 30)</u>]. The stormwater conveyance flows north where it discharges into a swale that flows into Halls Bayou.
Evidence of pollutants	The EPA Inspection Team did not observe evidence of pollutants migrating offsite

OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS	
migrating offsite (stains, deposits, ponding) at discharge points, into receiving waters or in MS4	into receiving waters or an MS4.
Evidence of Non-stormwater Discharges leaving site (authorized or unauthorized)	Evidence of non-stormwater sources/discharges was not observed during the inspection.
Description of general gradients/slopes onsite, all apparent discharge points, and discharge pathway from Facility to Receiving Water or MS4 (storm drains, channel, swale, ditches, driveway, pipes, & etc.)	The EPA Inspection Team observed that the ground surface throughout the Facility was primarily gravel, except for the paved center portion of the Facility [refer to <u>Appendix B, Photograph Log (Photographs 1 through 5, 8 through 13, 15, and 17 through 23)</u>]. The EPA Inspection Team observed the Facility to be graded slightly towards the north and west. Stormwater had the potential to flow north and west. A discrete stormwater discharge point was observed under the western Facility perimeter where it discharged into a Houston MS4 stormwater conveyance channel.

SECTION III – AREAS OF CONCERN

- 1) At the time of the inspection, the EPA Inspection Team identified the following at the Facility:
 - a. The Facility is engaged in scrap metal recycling (SIC Code 5093 – Scrap and Waste Materials). SIC Code 5093 is regulated under 40 C.F.R. § 122.26 for stormwater discharges associated with industrial activity.
 - b. The Facility’s outdoor areas were used for industrial activities including storage of scrap parts/materials.
 - c. At the time of the inspection, the Facility did not have coverage under the 2021 MSGP for Stormwater Discharges Associated with Industrial Activity.
 - d. Facility stormwater, from areas used for industrial activities, discharges to a stormwater conveyance channel that flows along the western Facility perimeter. The EPA Inspection Team observed a discrete stormwater flow path from the Facility to the offsite stormwater conveyance channel.
- 2) The EPA Inspection Team observed discolored stormwater and a sheen on pooled stormwater throughout the Facility [refer to Appendix B, Photograph Log (Photograph 4, 10 through 12, and 15 through 17)].
- 3) The EPA Inspection Team observed staining on the ground surface throughout the Facility [refer to Appendix B, Photograph Log (Photographs 6 and 9)]. A spill kit was not observed or reported at the Facility.
- 4) The EPA Inspection Team observed nine 55-gallon drums containing unknown substances without lids and exposed to stormwater [refer to Appendix B, Photograph Log (Photographs 13 and 14)].

- 5) The EPA Inspection Team observed bags of ceramic glue in the northeast corner of the facility that were uncovered and exposed to stormwater [refer to Appendix B, Photograph Log (Photograph 22)].

SECTION IV – LIST OF APPENDICES

Appendix A – Aerial Location

Appendix B – Photograph Log