

MULTI-SECTOR GENERAL PERMIT NON-FILER INSPECTION CHECKLIST

Inspection Date(s):	2/8/2023	
Time:	Entry: 2:40 AM	Exit: 3:30 PM
Weather Conditions:	Sunny with temperatures of approximately 45° F	
Media/Program:	Water – CWA § 301, 402 – Industrial SW/NEC	
Operator Name:	Swope's Salvage & Recycling	
Facility Name:	Swope's Salvage & Recycling	
Permit ID or Tracking #:	Unpermitted at the time of the inspection	
SIC Code:	5093 – Scrap and Waste Materials The Facility representative was unsure of the Facility's SIC code. The SIC code was inferred by the Inspector based on the industrial activities occurring at the time of the inspection.	
Facility Address:	1995 Baltimore Pike	
(city, state, zip code)	East Berlin, PA 17316	
Geographic Coordinates:	39.9863°, -76.9801°	
Mailing address:	1995 Baltimore Pike	
(city, state, zip code)	East Berlin, PA 17316	
County:	Adams	
Regular Days/Hours of Operation:	Monday – Friday, 7:00 AM – 3:45 PM, Saturday, 7:00 AM – 2:45 PM	
# of Employees at location:	15	
Size of Facility (in acres):	Approximately 8	
Receiving Water(s):	None observed	
Date facility est. @ location:	1982	
Facility Representatives:		
Name: Sonya Gettys	Title: Manager	Phone: (717) 292-2285
	Email: swopessalvage@yahoo.com	
Authorized Official: →	Contacted? ☒ Yes ☐ No	
Name: Sonya Gettys	Title: Manager	Phone: (717) 292-2285
	Email: swopessalvage@yahoo.com	
Inspector(s):		
Taylor Fontaine (PG Environmental)	Title: Inspector	Phone: (703) 956-1977
Ivy Koberlein (U.S. EPA Headquarters)	Title: Inspector	Phone: (202) 564-2549
Inspection Report Author:		
Name: Taylor Fontaine	Signature: <i>Taylor Fontaine</i>	Date: 5/3/2023
Supervisor Review:		
Name: Jessica Duffy	Signature: <i>JESSICA DUFFY</i>	Date:
Digitally signed by JESSICA DUFFY Date: 2023.05.03 14:22:18 -04'00'		

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 CWA and its implementing regulations found at 40 CFR Part 122.26. The inspection was unannounced and consisted of interviewing facility representatives, recording field observations, and taking photographs to document facility conditions at the time of the inspection. Accompanying this report is Appendix A, Aerial Map and Appendix B, Photograph Log.

Opening Conference

- 1) On February 8, 2023, U.S. Environmental Protection Agency (EPA) contractor, PG Environmental, conducted an unpermitted industrial facility stormwater inspection at Swope's Salvage & Recycling located in East Berlin (Facility). Taylor Fontaine of PG Environmental and Ivy Koberlein of U.S. EPA (EPA) Headquarters, (EPA Inspection Team) met with the Facility representative. Taylor Fontaine displayed his Clean Water Act (CWA) credentials, and the EPA Inspection Team conducted an opening conference. The EPA Inspection Team explained the purpose of the inspection was to assess the Facility's compliance status with respect to the PAG-03 National Pollutant Discharge Elimination System (NPDES) General Permit For Discharges of Stormwater Associated With Industrial Activity (Permit). At the time of the inspection, the Facility did not have coverage under the Permit.

Weather conditions at the time of the inspection were sunny with temperatures of approximately 45° F. There was no precipitation during the inspection. According to precipitation data from the National Oceanic and Atmospheric Administration (NOAA)¹, the East Berlin, Pennsylvania area received no rain the day before the inspection.

- 2) Credentials presented to: Sonya Gettys – Manager
- 3) Facility acknowledged receiving previous outreach materials or correspondence on Permit requirements? ☐ Yes ☒ No Describe:
- 4) Facility has been individually notified by permit authority or EPA that it is subject to stormwater requirements? ☐ Yes ☒ No Describe:

FACILITY'S OPERATION & PRODUCT DESCRIPTION

The Facility comprises an estimated 8 acres located on Baltimore Pike/Hoffman Road in the Borough of East Berlin, Pennsylvania. The Facility is bordered by private land to the north and east, Baltimore Pike to the west, and Hoffman Road to the south. The Facility includes one (1) building used as an office/residence and a truck scale for weighing materials. The remainder of the property is used for materials, and fluid storage. The Facility also includes several other structures used for materials storage.

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

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FACILITY'S OPERATION & PRODUCT DESCRIPTION

According to the Facility representative, the Facility receives various scrap metals (e.g., copper, brass, aluminum, steel) from public sources for processing and resale. The Facility representative stated that they do accept some used vehicles, but the gas tanks must be removed prior to acceptance at the Facility. Industrial operations exposed to stormwater include scrap metal storage, equipment fueling, and loading/unloading.

Other industrial facilities owned/operated by same business entity? ☐ Yes ☒ No Describe:

SECTION II – OBSERVATIONS

FACILITY OBSERVATIONS

Pollutant Sources	Observations
Loading/Unloading Operations	The Facility has one (1) entrance off Baltimore Pike via an unnamed private road where materials are loaded/unloaded.
Industrial Manufacturing/ Processing Operations	According to the Facility representative, scrap metal loading, unloading, sorting, and storage occur outside without cover.
Industrial Machinery & Equipment Storage	The EPA Inspection Team did not observe any Facility machinery/equipment being stored outside that was not actively in use during the inspection.
Storage of Industrial Materials or Products	The EPA Inspection Team observed covered storage areas for Facility industrial materials, including: used vehicle batteries wrapped in plastic and stored on pallets in the west area of the Facility (refer to Appendix B, Photograph DSCN5436); empty drums stored in the middle area of the Facility (refer to Appendix B, Photograph DSCN5453); and a 500-gallon tank of offroad diesel stored in the middle area of the Facility (refer to Appendix B, Photograph DSCN5454). The EPA Inspection Team observed uncovered or partially covered storage areas for Facility industrial materials, mostly scrap materials / scrap metals (refer to <u>Appendix B, Photographs DSCN5425, DSCN5427 - DSCN5429, DSCN5431 - DSCN5435, DSCN5437 - DSCN5452, DSCN5455 - DSCN5456, DSCN5459 - DSCN5460, DSCN5462, DSCN5465 - DSCN5469, DSCN5476 - DSCN5480, and DSCN5482).</u>

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FACILITY OBSERVATIONS	
Pollutant Sources	Observations
Liquid Storage (e.g., Tanks, Liquid Storage Drums)	The EPA Inspection Team observed the following liquid storage tanks/totes at the Facility: - Three (3) 55-gallon drums of waste oil without cover or containment in the east area of the Facility (refer to Appendix B, Photographs DSCN5429 and DSCN5432 - DSCN5533). - Two (2) 55-gallon drums of unknown liquid without cover or containment in the east area of the Facility (refer to Appendix B, Photographs DSCN5432 and DSCN5433). - One (1) 55-gallon drum of waste oil without cover or containment in the west area of the Facility (refer to Appendix B, Photographs DSCN5441 and DSCN5443). - One (1) 500-gallon tank of offroad diesel (refer to Appendix B, Photograph DSCN5454). The tank was located under cover. - A storage area for empty 55-gallon drums without cover or containment in the middle area of the Facility. Petroleum product staining was observed on the adjacent ground (refer to Appendix B, Photograph DSCN5453). - A storage area for empty 55-gallon drums without cover or containment in the northeast area of the Facility (refer to Appendix B, Photograph DSCN5478). The EPA Inspection Team observed petroleum product staining on the ground, both on paved and non-paved surfaces, throughout the Facility (refer to Appendix B, Photographs DSCN5427, DSCN5441, DSCN5443 - DSCN5445, & DSCN5447). Petroleum product staining was also observed in an empty tote in the west area of the Facility (refer to Appendix B, Photograph DSCN5430).
Waste Storage/Disposal Areas (solid and/or hazardous)	The EPA Inspection Team observed a tote without cover that contained used electronics in the south area of the Facility (refer to Appendix B, Photographs DSCN5427 - DSCN5428). The EPA Inspection Team observed several covered and uncovered containers (e.g., totes/dumpsters) that contained machine turnings and piles of machine turnings placed directly on the ground without cover or containment (refer to Appendix B, Photographs DSCN5431, DSCN5434, DSCN5446 - DSCN5448, DSCN5450 - DSCN5452, and DSCN5479 - DSCN5480). The EPA Inspection Team observed that some of the turnings were coated with cutting oil, a potential stormwater pollutant. The EPA Inspection Team observed the waste oil disposal areas described above in the "Liquid Storage (e.g., Tanks, Liquid Storage Drums)" section.
Waste Treatment Facilities (e.g., Pretreatment Systems)	There were no waste treatment facilities observed at the Facility.
Fueling Stations/Equipment Maintenance Areas & Cleaning Areas	The EPA Inspection Team observed one (1) (500-gallon) tank of offroad diesel under cover in the middle area of the Facility (refer to Appendix B, Photograph DSCN5454). The Facility representative did not know if the tank was double-walled, but there were no observable spill containment or cleanup measures directly adjacent to the tank.
Sediment & Erosion Controls	The EPA Inspection Team observed riprap in and adjacent to several culverts and drainage ditches in the north area of the Facility (refer to Appendix B, Photographs DSCN5457 - DSCN5458, DSCN5461-DSCN5463, and DSCN5471 - DSCN5473). The EPA Inspection Team observed that riprap and sediment had migrated into a drainage ditch downgradient of a materials storage area in the north of the Facility (refer to Appendix B, Photograph DSCN5473).

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FACILITY OBSERVATIONS	
Pollutant Sources	Observations
Spills/Leaks Handling	The EPA Inspection Team did not observe spill response materials at the Facility.
Outside Shelters	☐ Temporary (Date Established _____) ☐ Permanent None observed.
Evidence of non-stormwater sources/discharges (allowable if permitted under MSGP)?	None observed.
Evidence of process wastewater sources/discharges?	The EPA Inspection Team did not observe any evidence of process wastewater sources/discharge.

OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS	
Number and description of each potential Stormwater Discharge Point from the Facility	The EPA Inspection Team observed a drainage ditch that serves as the northern boundary of the Facility and a potential stormwater discharge point from the Facility into the drainage ditch (refer to Appendix B, Photograph DSCN5473).
Evidence of pollutants migrating off the Facility property (stains, deposits, ponding) at discharge points, into Receiving Waters or in MS4	The EPA Inspection Team observed one (1) location where sediment and riprap was migrating from the Facility into the drainage ditch (refer to Appendix B, Photograph DSCN5473).
Evidence of Non-stormwater Discharges leaving Facility (authorized or unauthorized)	None observed.

OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS

Description of general gradients/slopes at the Facility, all apparent discharge points, and discharge pathway from Facility to Receiving Water or MS4 (storm drains, channel, swale, ditches, driveway, pipes, & etc.)

The north part of the Facility slopes towards the drainage ditch. The middle area at the Facility was mainly gravel and compacted dirt and was relatively flat. The EPA Inspection Team observed one potential discharge point from the Facility into the drainage ditch that runs from east to the west along the Facility's northern boundary (refer to Appendix B, Photograph DSCN5473).

The EPA Inspection Team observed that the drainage ditch discharges into an adjacent wooded area to the west of the Facility (refer to Appendix B, Photograph DSCN5461).

Refer to Appendix A for an aerial view of the Facility and identified stormwater flow paths.

SECTION III – AREAS OF CONCERN

- 1) The EPA Inspection Team observed Facility storing and selling scrap metal, an industrial activity classified under SIC Code 5093 – Scrap and Waste Materials.
 - a. Businesses classified under SIC Code 5093 are regulated under 40 C.F.R. § 122.26 for stormwater discharges associated with industrial activity.
 - b. The Facility did not have coverage under the Permit at the time of the inspection.
- 2) The EPA Inspection Team observed uncovered or partially covered storage areas for Facility industrial materials, mostly scrap materials (refer to Appendix B, Photographs DSCN5425, DSCN5427 - DSCN5429, DSCN5431 - DSCN5435, DSCN5437 - DSCN5452, DSCN5455 - DSCN5456, DSCN5459 - DSCN5460, DSCN5462, DSCN5465 - DSCN5469, DSCN5476 - DSCN5480, and DSCN5482).
 - a. This also included several covered and uncovered containers (e.g., totes/dumpsters) that contained machine turnings, and piles of machine turnings placed directly on the ground without cover or containment (refer to Appendix B, Photographs DSCN5431, DSCN5434, DSCN5446 – DSCN5448, DSCN5450 - DSCN5452, and DSCN5479 - DSCN5480). The EPA Inspection Team observed that some of the turnings were coated with cutting oil, a potential stormwater pollutant.
- 3) The EPA Inspection Team observed the following liquid storage tanks/totes at the Facility without cover or containment:
 - a. Three (3) 55-gallon drums of waste oil in the east area of the Facility (refer to Appendix B, Photographs DSCN5429 and DSCN5432 - DSCN5533).
 - b. Two (2) 55-gallon drums of unknown liquid in the east area of the Facility (refer to Appendix B, Photographs DSCN5432 and DSCN5433).
 - c. One (1) 55-gallon drum of waste oil in the west area of the Facility (refer to Appendix B, Photographs DSCN5441 and DSCN5443).
 - d. Empty 55-gallon drums in the middle area of the Facility. Petroleum product staining was observed on the adjacent ground (refer to Appendix B, Photograph DSCN5453).
 - e. Empty 55-gallon drums in the northeast area of the Facility (refer to Appendix B, Photograph DSCN5478).

- 4) One (1) 500-gallon tank of offroad diesel stored under cover in the middle area of the Facility (refer to Appendix B, Photograph DSCN5454). It was unclear if the tank was double-walled, but there were no observable spill containment or cleanup measures directly adjacent to the tank.
- 5) The EPA Inspection Team observed that the facility had not implemented secondary containment or cover for machine turnings, waste oil drums, empty drums, and other locations where petroleum leaks and residual petroleum could pollute Facility stormwater, as evidenced by petroleum staining on the ground in the vicinity of these uncontained potential pollutant sources (refer to Appendix B, Photographs DSCN5427, DSCN5441, DSCN5443 - DSCN5445, DSCN5447, & DSCN5443). Petroleum product staining was also observed in an empty tote in the west area of the Facility (refer to Appendix B, Photograph DSCN5430).
- 6) The EPA Inspection Team observed a vehicle battery being stored outside without cover (refer to Appendix B, Photograph DSCN5476).

SECTION IV – CLOSING CONFERENCE

After the Facility walk, the EPA Inspection Team met with the Facility representative from Swope's Salvage & Recycling for a closing conference 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. Additional observations may be contained in this inspection report that were not identified at the time of the closing conference.

The inspection concluded at approximately 3:30 PM (EST).

SECTION V – LIST OF APPENDICES

Appendix A – Aerial Map

Appendix B – Photograph Log