

REPORT OF COMPLIANCE EVALUATION INSPECTION
(INDUSTRIAL STORMWATER)

Advantage Metals Recycling LLC. – 12th Street Facility

1153 S. 12th Street
Kansas City, Kansas 66105
Mailing Address
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Kansas City, Missouri 64106

Authorization Number: **KSR000112**

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 1153 S. 12th Street 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- 12th Street Facility

- Serena Dehoney, EHS Director serena.dehoney@advantagerecycling.com
- Blair Jorgensen, Facility Supervisor
- Jose Duran, Facility Supervisor
- Zach Davis, Safety Engineer

Unified Government of Wyandotte County, Department of Air Quality

- Mark Weckwerth, Department of Air Quality

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

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

Procedures and Introduction

Ms. Christina Gallick and Messrs. Mark Weckwerth, Adam Hendrickson, and Luke Rodriguez and I (Inspection Team), arrived at the Advantage Metals Recycling 12th Street Facility (Facility) at 9:10 A.M. on June 22, 2023. We met with Ms. Serena Dehoney and Blair Jorgensen, and Messrs. Jose Durand and Zach Davis (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 US 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 11).

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 2, 2023, Ms. Dehoney sent emails that included all requested documents.

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 002 and material processing and storage area associated with outfall 002, we observed a mobile fueling unit, we observed above ground fuel storage tanks within containment and stored under a roofed structure, several spill cleanup kits throughout the Facility, used oil stored in roofed structure, and properly stored used batteries. We observed three stormwater inlets (leading to Outfall 001) with booms. We also observed significant ground discoloration (NOPF#1) within the equipment parking area. Finally, we looked at Outfall 001 where we observed significant oil sheen (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 10) 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 9).

Facility Description (Figure 1)

Advantage Metals Recycling 12th Street facility (Facility) is a scrap metal recycling facility that processes ferrous metals scrap (end-of-life-vehicles, white goods, etc.) by sorting, shearing, torch cutting, and shredding. Ferrous materials are brought into the facility and stored outdoors. Scrap is purchased from commercial accounts and individual sellers. Shredded material is then sent offsite via rail and/or truck. Mobile equipment used on site includes but is not limited to trucks, material handlers, mobile shears, front end loaders, and forklifts.

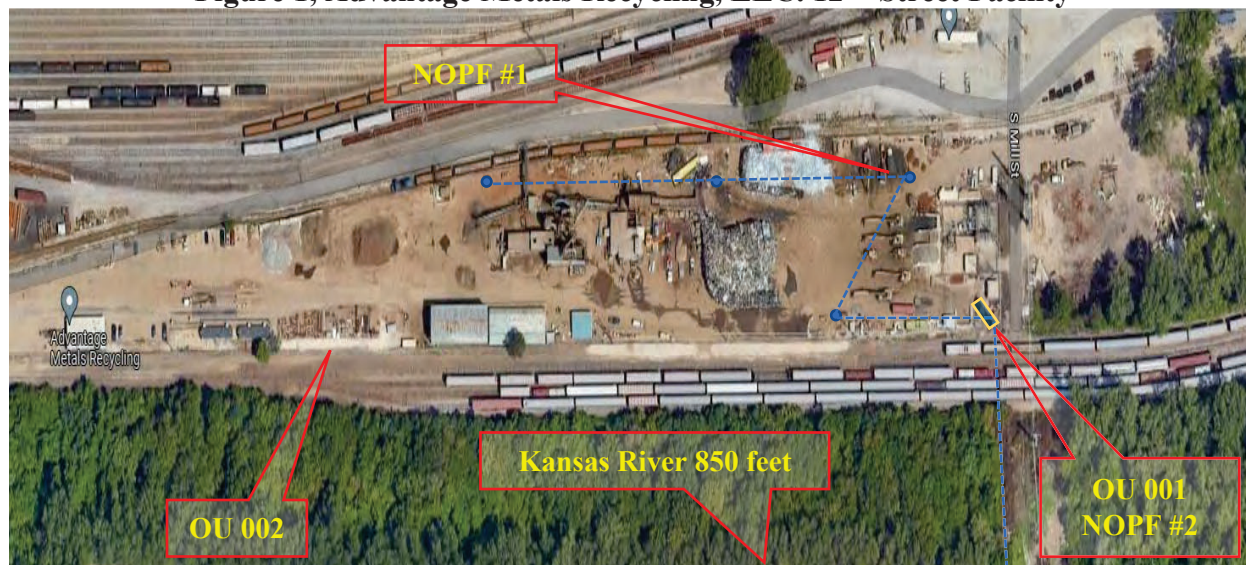
The Facility is located on a 12.75-acre property, in an industrial use area, and includes an administrative office, maintenance shop, and breakroom.

Aboveground storage tanks located at the Facility are for diesel and gasoline fuel storage to fuel the equipment, and, along with used oil, motor oil, and hydraulic oil containers are covered

under a Spill Prevention, Control, and Countermeasures (SPCC) Plan (Attachment 8). The facility also includes miscellaneous 55-gallon drum storage.

Impervious surface covers the entire site except for the eastern edge where 1.25 acres are leased, from Kansas City Terminal.

Figure 1, Advantage Metals Recycling, LLC. 12th Street Facility



Site Drainage Patterns

Based on the local topography of the site, drainage description provided, and drainage indicated on the site plan included in the SWPPP, overall, the Facility is sloped to allow stormwater to sheet flow south to Outfall 002 and controlled stormwater to flow into the stormwater conveyance system on the property to Outfall 001. Stormwater ultimately discharges from Outfall 001 on the southeast corner of the facility. From Outfall 001, the water flows in a pipe (850 feet) to the Kansas River. A small portion of the site (approximately one acre) from the office area along the south property line would surface flow into Outfall 002.

Table 1, Regulated outfalls at Advantage Metals Recycling Facility

Outfall	Description	BMPs
OU001	Drainage area consists of 8.7 acres. Approximately 850 feet to the Kansas River.	booms
OU002	Drainage area consists of less than one acre Approximately 850 feet to the Kansas River.	booms

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, review of records provided by Facility personnel, and my visual observations of the

site. All 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 11 with the associated photo log.

1. Facility personnel appeared knowledgeable of stormwater management and records indicated that 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).
2. During my walkthrough with Facility personnel, we looked at Outfall 002. The Outfall was not discharging and there was no evidence of oil sheen residue (photos 2 and 3 of Attachment 11).
3. During my visual inspection of the site, I observed a significant amount of ground discoloration caused by leaking equipment and improper maintenance practices within the equipment storage area (photos 15 and 16) as shown in photo 15 below. I pointed out to Facility personnel that my observation is an indication of poor housekeeping practices and it appeared that it's been going on for an extended period of time. Therefore, I issued NOPF #1 for the significant ground discoloration.

Photo 15, significant ground discoloration



A few feet from my observation of the significant ground discoloration, was one of the stormwater inlets that conveys stormwater to Outfall 001 (photo 14). The inlet was protected by booms but had significant oil residue surrounding it.

4. At the time of the inspection onsite structural controls consisting of oil absorbent booms, appeared to be well maintained. However, I observed that the discharge from Outfall 001 was full of significant oil sheen (photo 20), therefore, I issued NOPF #2.

Photo 20, oil sheen in the discharge of Outfall 001.



Conclusion

Overall, structural controls such as oil booms appeared to be installed correctly and records indicated that non-structural controls appeared adequate. However, evidence of oil spills on site and significant oil sheen in Outfall 001 indicates failure of good housekeeping practices and inadequacy of the current controls.

Ahmad, Naji

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Naji J. Ahmad
Environmental Engineer, WB/DWIS

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Nicole Moran
Section Chief, WB/DWIS

ATTACHMENTS

1. R7 ISW Checklist
2. NPDES
3. SWPPP

4. Periodic site inspections
5. Periodic Visual assessment
6. Comprehensive SWPPP inspection
7. Training records
8. SPCC
9. CBI Form
10. NOPF
11. Site photos