



U.S. Environmental Protection Agency, Region 4
61 Forsyth Street SW, Atlanta, GA 30303
Water Compliance Inspection Report

FACILITY DATA

NPDES ID: GAIS13681	Effective Date: 06/28/2017	Expiration Date: 05/31/2022
Facility Name: TAV Holdings, Inc - Greenville	SIC Code: 5015	
Address: 56 Jarrell Rd, Greenville, GA 30222		
On-Site Representative(s), Title, Phone Number:		Responsible Official, Title, Phone Number, Mailing Address:
Tim Good, Sr General Manager 404-767-0876	Brent Fairchild EHS Coordinator 606-585-7337 bfairchild@tavholdingsinc.com	Alexander Camozzi Operations Manager 3311 Empire Blvd Atlanta, GA 30354 acamozzi@tavholdingsinc.net

INSPECTION ENTRY DATES/TIMES

Entry Date/Time: 11/30/21, 8:55 am	Exit Date/Time: 11/30/21, 2:40 pm
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NAMES OF EPA AND STATE INSPECTORS

EPA Inspectors: Ahmad Dromgoole,
GEPD Inspectors: Jaliyl Collins

AREAS EVALUATED DURING INSPECTION (Check those areas evaluated)

X	Permit		Self-Compliance Program		Pretreatment
X	Records/ Records		Compliance Schedule		Pollution Prevention
X	Facility Site Review		Laboratory	X	Storm Water
	Effluent/ Receiving Waters	X	Operations & Maintenance		Combined Sewer Overflow
	Flow Measurement		Sludge Handling/ Disposal		Sanitary Sewer Overflow

INSPECTION NOTES

The inspection team, consisting of both EPA and GEPD inspectors, arrived at the site on November 20, 2021, to conduct a NPDES inspection evaluating compliance with the industrial stormwater permit. The inspection team initially met with Tim Good Jr. and Tim Good Sr. Brent Fairchild, the EHS Coordinator, later arrived at the site and the inspector credentials were present and an opening meeting was held. Upon completion of the inspection, an exit meeting was held with Brent Fairchild and Tim Good, Jr.

EPA REPRESENTATIVES

Inspector Signature/Name	Office/Phone Number	Date
Ahmad Dromgoole	US EPA Region 4/ECAD-WEB-WWES 404-562-9212	
Mark Robertson, Reviewer	US EPA Region 4/ECAD-WEB-WWES 404-562-9639	
Management Signature/Name	Office/Phone Number	Date
Ahmad Dromgoole, Acting Section Chief	US EPA Region 4/ ECAD-WEB-WWES 404-562-9212	

1. FACILITY LOCATION INFORMATION

GPS Coordinates	Latitude	33.662407		Longitude	-84.39245		
Receiving Water(s) or MS4	Parks Creek	Site Acreage	~45 acres total ~16 acres impervious		Weather Condition	Clear skies	
Date of NOI	01/27/21	SIC Code(s)	5093 (Sector N)	Date of Permit Coverage	2017	Discharge to 303(d) listed or TMDL waters	No

2. BASIC STORMWATER POLLUTION PREVENT PLAN (SWPPP) INFORMATION

SWP3 TOPICS:	YES	NO	N/E
2(A): SWPPP on-site (obtain a copy of the plan) Part 5.3 A copy of SWPPP from January 2019 was provided during the inspection.	X		
2(B): SWPPP Certification Part 5.1.6/Appendix B.7 The site plan provided during the inspection was not certified by the company.		X	
2(C): SWPPP modified or update to current conditions Part 5.2.1/Part 5.2.2 The SWPPP provided during the inspection had not been updated since its initial creation in January 2019. Since then, the site had been modified including the removal of Outfall 006, the addition of pollutant sources, and the addition of BMPs/stormwater management measures.		X	
2(D): Pollution Prevention Team named in SWPPP Part 5.1.1 .1 Tables with the SWPPP team members was provided: one with general position descriptions and responsibilities and other with the names of facility staff from December 2018.	X		
2(E): Employee Training Part 5.1.1.2/8.N.4.1.1/8.N.4.3.1 The SWPPP included annual training requirements for SWPPP team members and included a description of the topics to be covered during the training. These topics included spill prevention and response, good housekeeping, and material management.	X		
2(F): Site Description Part 5.1.2 The provided SWPPP included a description of the site.	X		
2(G): Site Map Part 5.1.2 The SWPPP included a site map from October 2020 providing details of the facility's orientation, pollutant sources, direction of runoff, and discharge points.	X		
2(H): Identify potential pollutant sources and particular pollutants Part 5.1.3 A list of the potential pollutant sources was included in the SWPPP.	X		
2(I): Inbound Material Control Program Part 8.N.4.1.1 According to the SWPPP, the facility will implement a strict scrap acceptance policy requiring the rejecting of materials with waste fuels, waste oils, broken batteries, PCBs, and asbestos. Loads with these unacceptable materials are to be rejected entirely or in part.	X		
2(J): Description of the Control Measures Parts 5.1.4/8.N.4.1.2 According the SWPPP, the facility was to implement both structural controls and work practices for stormwater management. This included measures to minimize the exposure of pollutant sources and sediment and erosion control measures. Minimum control measures were provided for the various potential pollutant sources including scrap storage, scrap processing, vehicle and equipment maintenance, and battery management.	X		
2(K): Schedule and Procedures for Good Housekeeping Parts 2.1.2.2/5.1.5.1(a)/8.N.4.1.4 The SWPPP includes descriptions of the various housekeeping measures to be implemented at the site. These measures include requirements for the management of process areas, material storage practices, and material inventory processes.	X		
2(L): Schedule and Procedures for Preventive Maintenance Parts 2.1.2.4/5.1.5.1(b) The SWPPP requires periodic inspections and cleaning of facility processes and equipment including drainage features, retention structures, and perimeter controls.	X		

2. BASIC STORMWATER POLLUTION PREVENT PLAN (SWPPP) INFORMATION

SWP3 TOPICS:	YES	NO	N/E
2(M): Contains Spill Prevention & Response Procedures Part 5.1.5.1(c)/2.1.2.5/8.N.4.1.7 The SWPPP included requirements for the inspection and managing of spills and potential spill sources in addition to the documentation and reporting requirements.	X		
2(N): Schedule and Procedures for Monitoring Part 5.1.5.2 The SWPPP includes a description of the analytical monitoring requirements for the facility. Included in this description is the required information that is to be documented, parameters to be monitored, and the monitoring frequency (annually). According to the SWPPP, the facility identified Outfall 006 as the representative outfall. The plan had not been updated to reflect the removal of Outfall 006 and establishing a new representative outfall for sampling.		X	
2(O): Schedule and Procedures for Routine Inspections Part 5.1.5.2(d)i The SWPPP requires the quarterly inspection of various facility areas including ponds, basins, drainage features, separator systems, erosion and sediment controls, concrete pads, storage tanks, outdoor storage areas, and waste storage and generation areas. According to the plan, debris and liter inspections and clean ups are to be performed with 48 hours of storm events or, at a minimum, monthly. These inspections were to be documented, recording the date and time, inspector's name, and observations.	X		
2(P): Schedule and Procedures for Quarterly Visual Inspections Part 5.1.5.2(d)ii The SWPPP includes a description of the visual inspection requirements. According to the plan, all outfalls were to be visually inspected quarterly.	X		
2(Q): Schedule and Procedures for Annual Comprehensive Inspections Part 5.1.5.2(d)iii Annual comprehensive evaluations were required by the SWPPP to be performed once per year. As part of the evaluation, the inspector was to evaluate areas contributing to industrial stormwater discharges, measure for reducing pollutant loading, and structural control measures.	X		

3. SITE DESCRIPTION and SWPPP

The TAV Holdings facility in Greenville, GA is a recycling facility for the recovery of valuable metals. Operations at this site began in 2017. At this site, the company assembles and operates scrap recycling processes for testing and demonstration for potential clients. The materials processed at this facility include, but are not limited to, car shredder residue, aluminum shredder residue, waste electrical equipment, and incinerator ash. The raw materials for the process, which are primarily diverted landfill materials, are primarily stored in outdoor uncovered storage piles throughout the site. When needed, material is moved by front-end loaders to the outdoor processing area. These processes include various screening/sorting operations and wet and dry separation processes. Additionally, there is a covered outdoor equipment assembly and fabrication area. Wastewater from the separation process is routed to a clarifier on site prior to being routed to the two process water holding ponds. According to facility personnel, the facility operates 2 shifts per day, 6 days per week.

4. RECORD REVIEW

Record Review	YES	NO	N/E
4(A): Representative on-site	X		
4(B): Supplemental BMP Program required (303d listed waters)? Appendix C			X
4(C): NOI Submitted to EPD Part 5.4 A NOI was submitted to EPD for coverage under the 2017 general permit. An amended NOI was submitted in 01/2021 for the removal of Outfall 006.	X		
4(D): Records of incidents with spills, leaks, and/or other releases of pollutants Part 5.4 A reportable spill log was included as an appendix of the SWPPP. The reportable spill log was last filled out in January 2019 and did not appear to have been updated.		X	
4(F): Records of routine quarterly inspections Part 4.1/Part 5.4 Inspection records for 2020 and 2021 were requested during the inspection. The quarterly inspection reports were provided and documented the necessary information from the permit.	X		

4. RECORD REVIEW				
Record Review		YES	NO	N/E
4(G): Records of quarterly visual runoff inspections Part 4.2.1/Part 4.2.2 Records of quarterly inspections were requested for 2020 and 2021. With the company claiming to have a representative outfall, a quarterly visual assessment could be performed at one outfall and reported as the result for each similar outfalls so long as a different outfall is assessed each quarter. Therefore, over the two-year period, a quarterly visual assessment should have been performed at each of the active outfalls. In response to the request for quarterly visual assessments, the company provided only one visual assessment which was for Outfall 001 from September 2020.			X	
4(H): Records of comprehensive annual inspections Parts 4.3/5.4 The annual comprehensive report from 2020 was provided by the company.		X		
4(I): Records of employee training Part 5.4 SWPPP training is required for each member of the pollution prevent team. According to this SWPPP, this team includes Tom Valerio (Owner), Andy Wahl (President), Tim Good, Sr. (Facility Manager), and all facility personnel. In response to the request for training records, training records for 2018 and 2020 were provided for Tim Good Sr. and Tim Good Jr. No training records were provided for the remaining members of the pollution prevention team. Additionally, no records were provided of the general stormwater management training provided to all facility personnel.			X	
Records of Corrective Actions/Corrective Measures Parts 3.4/3.5 Corrective measure reports were requested for 2020 and 2021. In response, reports were submitted for June and July 2020. Included in these reports were observed deficiencies from the prior inspection and updates on the current conditions of those areas. These reports are required for a number of conditions including, but not limited to, observed deficient control measures and unauthorized discharges. From the review of the of the quarterly inspection records provided, the company identified multiple BMPs needing maintenance during each quarterly inspection. Additionally, deficient BMPs were observed during the inspection that, according to facility personnel, had needed repair for some time. In response to these deficient BMPs, the company is expected to implemented corrective measures and documented these measures in the necessary report.			X	
4(J): Records of Benchmark Sampling Part 6.2.1/Part 6.1.4/Part 8 Subsector N Benchmark monitoring data was provided for 2020. Due to first quarter exceedances for copper, zinc, and TSS at Outfall 002, the facility implemented quarterly monitoring being in the second quarter. The second quarter monitoring was identified as being at Outfall 006 and showed continuing exceedances of copper and zinc. Third quarter monitoring was conducted at Outfall 001 which continued to show zinc exceedances. Although there were continued exceedances, no records of continuing quarterly monitoring were provided.			X	
4(L): Non-stormwater certification on-site? Part 5.1.3.4 According to the facility's SWPPP, no floor drains were in the process area; therefore, no smoke or dye testing was performed. The facility did certify an initial non-stormwater discharge investigation in 12/2018 (included in the SWPPP) and again in the 2020 annual report that outfalls were observed during dry periods to identify non-stormwater discharges.		X		

5. SITE EVALUATION & SWP3 IMPLEMENTATION	
Pollutant Sources	Note location, quantitative description, design issue, O&M deficiencies (including the nature and extent), and pollutants off-site
5(A): Loading/Unloading Area	Equipment received at the facility is delivered to the parking lot in the southeast corner of the site (see photo DSCN2448). This area was believed to drain south towards Outfalls 001 and 002.

5. SITE EVALUATION & SWP3 IMPLEMENTATION

Pollutant Sources	Note location, quantitative description, design issue, O&M deficiencies (including the nature and extent), and pollutants off-site
5(B): Outdoor Storage Facilities	Materials are stored at the site in outdoor storage piles. The raw materials for the process are stored in various storage piles along the western and southern ends of the site (see photos DSCN2459-DSCN2461 and DSCN2465-DSCN2466). Significant portions of these storage piles are located on impervious/paved areas at the site. Product storage piles were observed along the south side of the fabrication building. These storage piles, seen in photos DSCN2488-DSCN2489, had a concrete block structure around them to help manage runoff from the piles. This storage area was not identified in the facility's SWPPP. The plastics and other non-metals separated during the process are stored in the waste storage pile on the north side of the site. This large waste storage pile was not identified in the facilities SWPPP site map. The west side of this pile is adjacent to the upper pond and can be seen in photos DSCN2478-DSCN2479. The south side of the storage pile adjacent to the process water pond can be seen in photo DSCN2485. The north side of the waste material storage pile can be seen in photo DSCN2493. A discolored runoff was observed along the north side of this area leading towards Outfall 005. Additionally, the north end of the storage pile was observed as having collapsed and encroached on the slope around Outfall 005. The facility's equipment laydown area was located along the north and east sides of the site. A portion of the laydown area on the north side of the site along the waste material storage pile, seen in photos DSCN2492, was observed with standing water and a noticeable sheen/discoloration. The laydown area along the east side of the site can be seen in photos DSCN2500-DSCN2503.
5(C): Outdoor Manufacturing/Processing Operations	Facility operations at the TAV facility all occur outdoors. This includes the various sorting, screening, and separation processes. According to the site plan, various BMPs like housekeeping measures and diversions would be used to either minimize the exposure of pollutant sources and/or direct runoff to a treatment pond. For the various floatation processes, the facility holds process water in an outdoor storage tank (seen in photo DSCN2481). According to facility personnel, overflow from this tank is directed back to the upper pond. Wastewater from the process is sent to a clarifier to remove floatables and solids prior to it being directed to either the upper or lower pond. The solids from the clarifier are removed at the one end of the clarifier (seen in photo DSCN2486). The solids are collected on the ground prior to be moved to a waste storage pile. The solids collection area at the end of the clarifier slopes west towards the upper pond.
5(D): Stormwater Treatment and Storage Measures	The facility utilizes retention and holdings ponds for the collection and reuse of stormwater runoff. The lower pond, in the northwest corner of the site, can be seen in photos DSCN2472 and DSCN2475. This pond serves as the initial treatment pond for runoff from along the west side of the site. Although removed from the permit in the updated NOI from January 2021, Outfall 006 (seen in photo DSCN2476) was associated with this pond. A significant amount of plastics and other floatable materials were observed across the surface of this pond. The upper pond, seen in photos DSCN2473 and DSCN2477, was located to the east of the lower pond and adjacent to the waste material/plastics storage pile. An emergency spillway was in place to allowing the upper pond to drain to the lower pond (see photos DSCN2473-DSCN2374). Currently these two ponds (the upper and lower ponds) are used to retain and hold water for use in the process. The facility utilized a number of pumps to move water from one pond to another and then to the in-ground process water tank (see photo DSCN2481). During periods of low rainfall, the facility is capable of supplementing water for the process (as seen in photo DSCN2475) from a low laying area to the north of the pond.

5. SITE EVALUATION & SWP3 IMPLEMENTATION

Pollutant Sources	Note location, quantitative description, design issue, O&M deficiencies (including the nature and extent), and pollutants off-site
5(E): Sediment & Erosion Controls (BMPs)	The facility utilized berms and diversion ditches to direct surface water runoff to either one of the retention ponds or outfalls. The material storage piles along the west side of the site were observed with a berm and drainage ditch along the south and west sides of the site, diverting stormwater runoff to the retention ponds on the north side of the site. One section of the berm, on the opposite side of the diversion ditch from the storage piles, appears to have been breached at one point (see photo DSCN2464). Aerial photographs of the area along the west side of the storage pile showed evidence of past breaches and a drainage path diverting runoff from the southwest corner of the site near the raw material storage pile running north towards the stream. Due to the wet conditions of ground at the time of the inspection, this area was not observed during the inspection. Portions of the drainage swale and conveyance, seen in photos DSCN2468-DSCN2471, was observed during the inspection with significant erosion features. The bermed area in the southwest cornering was observed as retaining runoff from the piles. The accumulated water, seen in photo DSCN2467, was observed with a noticeable sheen. The majority of the stormwater runoff at the site flows north towards one of the 3 (previously 4) outfalls. The process areas in the middle of the property are primarily diverted north towards the holding ponds in the northwest corner (associated with former Outfall 006). Portions of this flow path can be seen in photos DSCN2482-DSCN2484. A portion of the southern process area was observed discharging south towards Outfall 002. The flowpath, seen in photos DSCN2453-DSCN2454, was observed with significant silt deposition discharging offsite to the drainage ditch along the road. According to the facility's SWPPP, multiple storm drain inlets were in place in the impervious area in the middle of the site. It was not clear to facility personnel where the storm drains led, potentially to either Outfalls 001 or 002, but the inlets were believed to have been plated shut. One of the inlet locations was believed to be in the standing water seen in photo DSCN2487. Another drain inlet was believed to be underneath the material storage pile on the south side of the fabrication building (see photo DSCN2504).
5(F): Spills/Leaks Handling Good Housekeeping	The facility previously used fuel storage tanks on site for equipment refueling (seen in photo DSCN2480). At the time of the inspection, the tanks were no longer in use with the facility being in the process of moving the fueling operations to another location. Currently, fuel trucks are brought on daily for the equipment refueling. A number of the water conveyances observed at the site were seen with sheens. One of the sheens, seen in photos DSCN2455-DSCN2458, was the result of maintenance activities being performed on an excavator. Although some sand was observed along the back side of the equipment to collect the spill fluids, it was insufficient, resulting in fluids being released to the stormwater conveyance.

6. OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS

Outfall, Stormwater Discharge & Receiving Water	YES	NO	
6(A): Number & location of stormwater discharge(s)/outfall(s) consistent with the SWP3	X		Describe: At the time of the inspection, the facility had five permitted outfalls (001-005) and one recently removed outfall (006). The recently removed Outfall 006 was observed during the inspection and appeared to have been capped off (see photo DSCN2476). Although most of the outfalls were identified, facility personnel were unable to positively identify all of the facility outfalls. The two of the three active outfalls along the north end of the site were not easily identifiable. Outfall 005 can be seen in photos DSCN2494-DSCN2495. The potential locations of Outfalls 003 and 004 (though unsure according to facility personnel) can be seen in photos DSCN2496 and DSCN2499. Concerns were raised with facility personnel of their inability to identify not only the locations of Outfalls 003 and 004 but also the inlet locations for the Outfalls. It is believed that Outfalls 001 and 002 were tied to the storm drain inlets in

			the paved area around the storage piles. These inlets were supposed to be sealed off but evidence of ongoing discharges was observed during the inspection with Outfalls 001 (seen in photos DSCN2505) and Outfall 002 (seen in photo DSCN2452) showing evidence of discharged silt from the site.
6(B): Evidence of off-site accumulation of pollutants observed in receiving water	X		Describe: The road along the south side of the site has a stormwater drainage ditch running east/west that received stormwater discharges from Outfalls 001 and 002. During the inspection, the drainage feature was observed with accumulated silt down gradient of the two outfalls (see photos DSCN2449-2451 and DSCN2506).
6(C): Other discharges or potential discharges off-site (not through permitted outfalls)		X	Describe: No discharges were observed during the inspection through unpermitted discharge points. Aerial photographs showed evidence of past discharges off site from the pooling are in the southwest corner of the site to a conveyance running north but could not be confirmed at the time of the inspection.
6(D): Non-stormwater discharge observed	X		Describe: Potential commingling of process water and stormwater was observed along the southern end of the site (see photos DSCN2459-DSCN2463). Process water from the souther processing area was observed flowing past the berm and south towards a drainage feature to Outfall 002. Process water from the southern end of the site could be seen sheet flowing to the drainage feature along Jarrell Road where Outfalls 001 and 002 discharge (see photos DSCN2453-DSCN2354).

Additional inspection summary, narrative, findings, comments, photos, and schematic diagram of the facility area as necessary:

At the conclusion of the inspection, an exit interview was held with Brent Fairchild. A list of documents needed for review were discussed and the inspectors were told to contact Robert Brewer of the company for the necessary records. The following preliminary observations were provided to the company:

- Significant amounts of fines from the site were observed in the drainage ditch along Jarrell Rd down gradient of Outfalls 001 and 002.
- The outfalls on the north side of the site were not easily identifiable and appeared to have not been routinely inspected.
- The drainage ditch and berm along the west side of the raw material storage piles were observed to have significant amounts of silt accumulation and erosion features.
- With the dry current weather conditions and observed active runoff towards the southern end of the site, there was the concern that there were process water discharges from the site.
- The waste material/plastics storage pile along the northern end of the site had overground the intended footprint and was becoming unmanageable (with it beginning to spill over and down the hill on the north side of the site).

Photo Log Follows.