

REPORT OF COMPLIANCE EVALUATION INSPECTION
(INDUSTRIAL STORMWATER)

Advantage Metals Recycling LLC. - Manchester Facility

3005 Manchester Trafficway
Kansas City, Missouri 64129

Mailing Address

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Authorization Number: **MO-0115801**

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 7

ENFORCEMENT AND COMPLIANCE ASSURANCE DIVISION (ECAD)
WATER BRANCH/DRINKING WATER & INSPECTIONS SECTION (WB/DWIS)

ON

June 21, 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 21, 2023, at the Advantage Metals Recycling located at 3005 Manchester Trafficway in Kansas City, Missouri. 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. Ms. Gabrella Elliott with the Missouri Department of Natural Resources was present during the inspection.

Participants

Advantage Metals Recycling- Manchester Facility

- Serena Dehoney, EHS Director serena.dehoney@advantagerecycling.com
- Joshua Jones, Regional Operations Manager
- Brian Jacobs, Facility Manager
- Amanda Schoolcraft, Facility Supervisor

Missouri Department of Natural Resources- Kansas City Regional Office

- Gabrella (Gabby) Elliott, Environmental Specialist - Water Pollution Unit

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

- Naji J. Ahmad, Environmental Engineer, ECAD/WB/DWIS
- Adam Hendrickson, Environmental Scientist, ECAD/WB/DWIS

Procedures and Introduction

Ms. Gabby Elliott, Mr. Adam Hendrickson and I arrived at the Advantage Metals Recycling Manchester Facility (Facility) at 9:00 A.M. on June 21, 2023. We met with Mses. Serena Dehoney and Amanda Schoolcraft and Messrs. Joshua Jones and Brian Jacobs. 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 outfalls 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 me two emails that included all requested documents.

Using a site map, Mses. Dehoney and Schoolcraft and Messrs. Jones and Jacobs escorted Ms. Elliott, Mr. Hendrickson and I on a visual inspection of the Facility. During the Facility walkthrough, we looked at Outfall 004 and the material processing and storage area associated with outfall 004, we observed an outdoor baller, indoor baller, and properly stored used batteries. We observed Outfall 003 discharging clear water, and the process and storage area associated with Outfall 003. Then we looked at the process area in the vicinity of the auto shredder where we observed above ground fuel storage tanks within containment stored under a roofed structure. We also observed significant ground discoloration (NOPF#1) near the roofed structure. We also observed the location where run-on from the Missouri Organic Recycling (the old Centropolis Landfill, now a mulch yard) located on the south side enters the Facility. Finally, we looked at Outfall 001 where we observed the discharge of clear water, but we also observed debris and floatables at the area surrounding the inlet of Outfall 001 (NOPF#2).

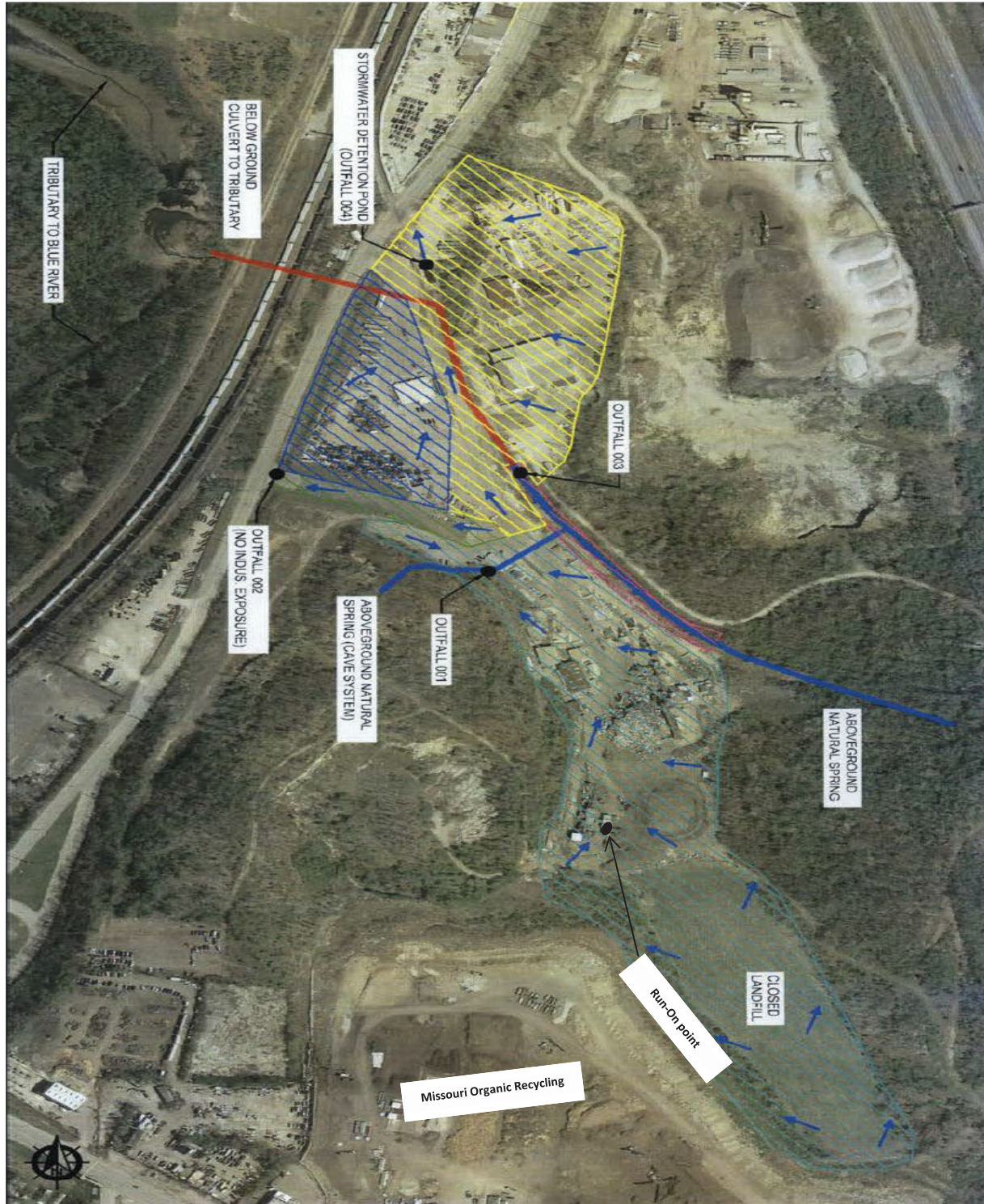
After the Facility walkthrough, I discussed my preliminary observations of the Facility. I held a formal exit meeting with Mses. Dehoney, Schoolcraft and Elliott and Messrs. Jacobs and Hendrickson. I informed Ms. Dehoney that I will issue a Notice of Preliminary Findings (NOPF) (Attachment 10) via email. I also informed Ms. Dehoney that I would communicate to her findings that I may observe upon my return to the office. The Facility chose not to claim any confidential business information (Attachment 9).

Facility Description (Figure 1)

The Manchester Facility is a scrap metal recycling facility that process ferrous and non-ferrous metals by sorting, baling, and cutting to be sold to various scrap metal consuming facilities such as steel mills and non-ferrous smelters. The Facility also has an auto shredder that produces auto shredded fluffs. The Facility is located on four parcels with a total area of 146 acres owned and operated by Advantage Metals Recycling LLC. Approximately 35 acres have industrial activities or significant materials that may contact stormwater. The remaining area consists of a closed landfill (7 acres), old quarry (28.6 acres), wooded area (70 acres), and general use area (6 acres). The process area is bounded on the east by the 70 acres of wooded area leading to Highway 435, and on the south by the Missouri Organic Recycling facility (36.3 acres), on the west by the 28.6

old quarry, and on the north by some vacant areas along with Manchester Trafficway and industrial and commercial development.

Figure 1, Advantage Metals Recycling, LLC. Manchester Facility



Based on the local topography of the site and drainage description provided and indicated on the site plans included in the SWPPP, overall, the Facility is sloped allowing stormwater to flow to the west and northwest. All flows would flow to a tributary to the Blue River which is approximately 0.75 miles west of the Facility. Figure 2 below describes the drainage patterns of the Facility.

Figure 2, Advantage Metals Recycling, LLC. Manchester Facility Drainage

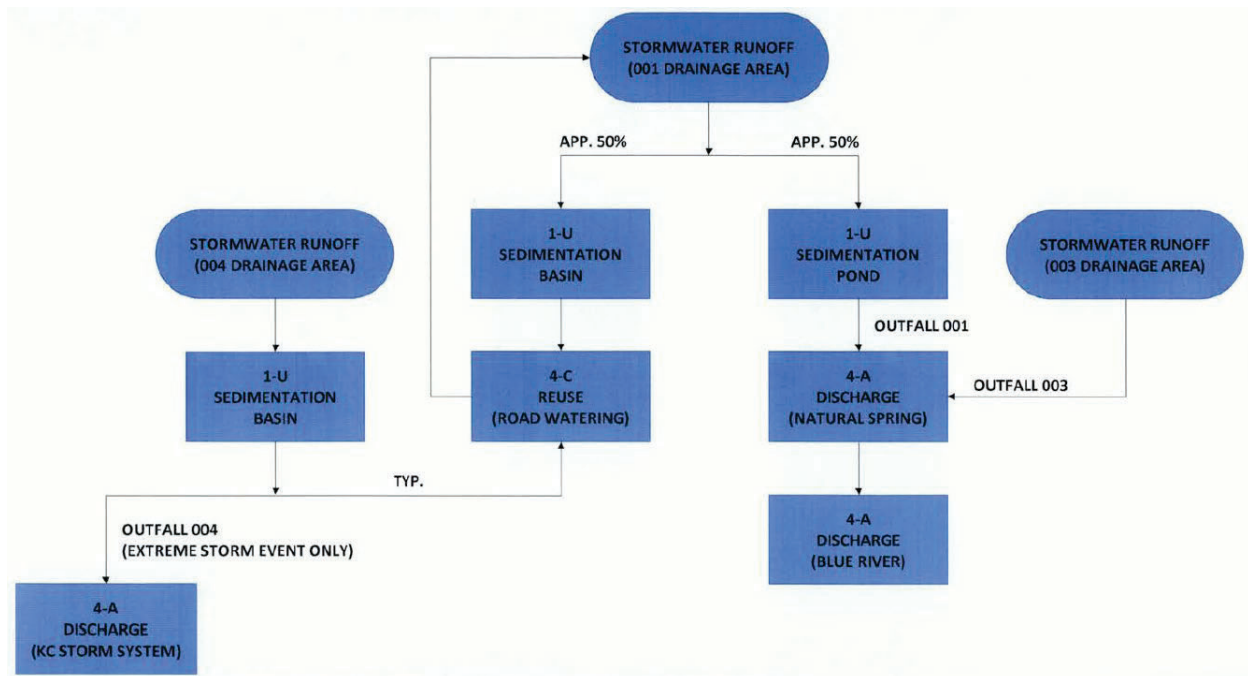


Table 1, Regulated outfalls at Advantage Metals Recycling Manchester Facility

Outfall	Description	BMPs	Monitored
OU001	Drainage area consists of 876,000 sqft. Approximately 0.93 mile to Tributary to Blue River. Estimated flow 0.9 MGD. Receive flow from auto shredder fluff storage areas, ferrous metal recycling/storage area, end of life vehicle processing area, and closed landfill. In addition, it receives <u>Run-On</u> water from the Missouri Organic Recycling 36.3-acre facility located on the site's south property line.	Rock-Check-Dams, stormwater trenching, Sedimentation pond	Benchmark and visual assessment
OU002	Drainage area consists of 42,000 sqft. Approximately 0.5 mile to Tributary to Blue River.	Sedimentation structure	N/A Non-industrial stormwater

OU003	Drainage area consists of 43,000 sqft. Approximately 0.92 mile to Tributary to Blue River. Estimated flow 0.6 MGD. Receive flow from closed landfill, ferrous metal recycling and storage, railcar loading area, and auto shredder fluff storage area.	Stormwater trenching, baffles, oil absorbent booms	Benchmark and visual assessment
OU004	Drainage area consists of 466,000 sqft. Approximately 0.76 mile to Tributary to Blue River. Estimated flow 1.1 MGD. Receive flow from scrap vehicle storage area and non-ferrous scrap metal storage areas. Water collected in storm retention basin is reused as roadway dust control. Discharges during significant rainfall.	Stormwater trenching, and 38,000 gal. Storm retention basin.	Benchmark and visual assessment

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, my review of records provided to me 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 21, 2023. Photos taken during the inspection on June 21, 2023, are included in Attachment 11 with the associated photo log.

1. I observed discharge from outfalls 001 and 003. Discharged water was clear and free of color, oil sheen, solids, foam, and floatables.
2. Considering the nature of process, overall, on site good housekeeping practices and stormwater runoff best management practices (BMPs) were adequate and well maintained.
3. Structural controls on site appeared effective and well maintained. Those included: stormwater trenching, in ground stormwater system, a 38,000-gallon storm retention basin, sedimentation pond, rock-check-dams, baffles, and oil absorbent booms.
4. Facility personnel appeared knowledgeable of stormwater management and non-structural controls also appeared adequate. Those included implementation of the SWPPP, monthly site inspections, periodic visual assessment of stormwater quality at the outfalls, quarterly stormwater benchmark monitoring, and employee training.
5. During my discussion with Facility personnel in regard to benchmark monitoring and exceedances, Ms. Dehoney mentioned that the facility could not figure out the source of boron (B) in the discharge from Outfall 001. However, during our walkthrough of the area contributing to Outfall 001, especially in the south side near the auto shredder, we noticed that the Facility receives run-on water from the Missouri Organic Recycling facility. This facility is a 36.3-acre mulch yard that is set on a significantly higher elevation than the Facility to the

south, and significantly contributes to the stormwater discharging through Outfall 001. The run-on water is controlled by the Facility by rock-check-dams and a sedimentation pond before it reaches Outfall 001.

I recommended that the Facility monitor the run-on point where it enters the Facility before it comes with outfall 001 surface runoff from the Facility.

6. The SWPPP document and required records appeared adequate.
7. During my review benchmark monitoring reports upon my return to the office (Attachment 12), I noticed that the Facility exceeded some of the benchmarks during several quarters at Outfalls 001 and 003 as summarized Table 2 and Table 3 below.

Table 2, Benchmarks Exceedances at Outfall 001 (mg/l)

	COD	OG	Al	Cd	Cu	Fe	Pb	Hg	Zn	TSS	B
	120	10	0.75	.0082	0.022	4.0	0.151	.0024	0.181	100	2.0
11/23/2020			2.36		.0452	4.32			.362		
3/10/2021		28.9	21.1	.0303	1.68	94.6	2.4	.0047	18.8	958	2.14
4/16/2021											
6/11/2021			.796								2.16
8/31/2021			.833								
12/15/2021											2.41
3/18/2022											2.16
4/29/2022											2.13
8/19/2022			.855								2.48
10/24/2022			.855								2.53
2/8/2023			1.02								2.11
6/16/2023			1.25						.254		2.7

Table 3, Benchmarks Exceedances at Outfall 003 (mg/l)

	COD	OG	Al	Cd	Cu	Fe	Pb	Hg	Zn	TSS	B
	120	10	0.75	0.0082	0.022	4.0	0.151	.0024	0.181	100	2.0
11/23/2020											
3/10/2021	134				.179	9.8	.193		1.453	101	
4/16/2021											
6/11/2021			.783								
8/31/2021			1.84		.0716	4.88			.631		

8. Based on my review of comprehensive reports (Attachment 6), I was not able to find indication that the Facility took corrective action as required by condition D.4. of the NPDES permit. Therefore, on July 24, 2023, I sent an email to Ms. Dehoney asking to verify the information I included in the above two tables and asking about Facility action investigating the exceedances, excluding boron which was discussed during the inspection.
9. On August 11, 2023, Ms. Dehoney sent an email indicating that, “When benchmarks are

exceeded, BMPs are evaluated and replaced. Increased attention has been given to ensure BMPs are changed as needed. In the 1Q-2Q 2023, the site invested a considerable amount of capital (~\$25k) to clean out and re-line the swales and settling pond that precedes outfall 001. It is expected that the benchmark results will improve after several rainfalls aid in stabilization of the disturbed areas, and as vegetation has time to root and increases. Additionally, evaluation is underway of processed storage pile locations as they relate to the outfalls.”

Ms. Dehoney also mentioned that “*Per our discussion when you were onsite, AMR appreciates your suggestion of evaluating run-on to the site from the Centropolis Landfill that has an active business and Missouri Organic Recycling. Missouri Organic Recycling’s process continues to raise the topography of the site, including steep slopes that increase the speed in which water runs off the site and onto AMR’s property. AMR will coordinate a sample in the near future.*”

10. I issued NOPF #1 for the significant ground discoloration near the fuel tanks storage shed as can be seen in photo number 17 below. Facility personnel indicated that they would clear discoloration as soon as possible.

Photo 17, Significant ground discoloration



11. I also issued NOPF #2 for the accumulation of floatables at the outlet of Outfall 001 as shown in photo number 26 and Outfall 003. Although discharge water was clear of floatables at both outfalls, I pointed out to Facility personnel that this is part of good housekeeping practices. Facility personnel indicated that they would pick-up and clean the floatables as soon as possible.

Photo 26, Floatables accumulating at Outfall 001



Conclusion

1. Overall, structural controls and non-structural controls appeared adequate.
2. The Facility should continue investigating the source of boron presence in the discharge through Outfall 001. The Facility should also consider sampling the run-on flow from the Missouri Organic Recycling mulch yard.
3. The Facility should provide records of evaluating its BMPs and corrective actions taken after the benchmark exceedances as required by the NPDES permit. The Facility should also create such records in a timely manner when corrective action is taken.

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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
12. Benchmark sampling reports