

REPORT OF COMPLIANCE EVALUATION INSPECTION
(INDUSTRIAL STORMWATER)

Alter Trading Corporation/Alter Metal Recycling-Columbus

3440 East 15th Street
Columbus, Nebraska 68601

Authorization Number: **ISW-202201042**

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY REGION 7
ENFORCEMENT AND COMPLIANCE ASSURANCE DIVISION (ECAD)
WATER BRANCH/DRINKING WATER & INSPECTIONS SECTION (WB/DWIS)

ON

July 30 and August 2, 2024

Introduction

At the request of the Water Branch (WB), Enforcement and Compliance Assurance Division (ECAD), a Compliance Evaluation Inspection (Industrial Stormwater) was conducted on July 30 and August 2, 2024, at the Alter Metal Recycling facility in Columbus, Nebraska. 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. Jason Windhorst with the Nebraska Department of Environment and Energy was present during the inspection.

Participants

Alter Metal Recycling- Columbus

- Joe Rosenbaum, Facility Manager joseph.rosenbaum@altertrading.com
- Ryan Carpenter, Regional Environmental Manager Ryan.Carpenter@altertrading.com

Nebraska Department of Environment and Energy-NPDES Compliance Section

- Jason Windhorst, Environmental Specialist, QCIS, QPSWPP jason.windhorst@nebraska.gov

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

- Naji J. Ahmad, Environmental Engineer, ECAD/WB/DWIS Ahmad.Naji@epa.gov

Inspection Procedures

Mr. Jason Windhorst and I arrived at the Alter Metal Recycling facility in Columbus, Nebraska, on July 30, 2024, at 9:45 AM. We met with Mr. Joe Rosenbaum. We introduced ourselves and presented our credentials. I explained the purpose and procedures of the industrial stormwater compliance evaluation inspection. These included completing the Region 7 Industrial Stormwater Worksheet (Attachment 1) and the U.S. EPA Confidentiality Notice, evaluating self-

monitoring and stormwater management practices, and conducting a facility walk-through with photographs (Attachment 5).

I provided Mr. Rosenbaum with the U.S. EPA Small Business Resources Information Sheet and the U.S. EPA Confidentiality Notice (CBI). The facility chose not to claim any confidential business information.

Mr. Rosenbaum presented us with the Stormwater Pollution Prevention Plan (SWPPP) folder that included: the SWPPP document (Attachment 3), site map with drainage patterns and some of the site quarterly routine and visual inspection reports. Mr. Rosenbaum was unable to find the monitoring reports or the employee training records. However, he mentioned that he must contact Mr. Ryan Carpenter to ask him for the records. Mr. Rosenbaum also presented the Spill Prevention Control and Countermeasure (SPCC) Plan and SPCC training records (Attachment 7).

After a brief description of the site operations and a brief review of the SWPPP and stormwater management records, Mr. Rosenbaum escorted Mr. Windhorst and me on a visual inspection of the site.

We started the visual inspection of the site by looking at the automatic sampler (photos 1-3), the metal receiving buildings (photos 4 and 5), above ground diesel fuel tanks with secondary containment (photos 6-9 and 34), floor drains inside the maintenance shop (photos 12 -14), ground discoloration (photos 15 and 33), retention area and dewatering pump (photos 16-21), shredder operation building (photos 22 and 23), vehicle dismantling area (photo 24), the retention pond behind the shredder building (photos 25-29), discharge point (Outfall 02) (photos 30 and 31), stormwater drains at the loading dock of the process building leading to Outfall 01 (35-37), Outfall 01 (photo 38), and leaking equipment and ground discoloration on the east side of the maintenance shop (photos 39 - 43).

After the site walkthrough, I held a brief exit meeting with Mr. Rosenbaum. I discussed the preliminary observations, and I informed him that I will issue a Notice of Preliminary Findings (NOPF) and return on August 2, 2024, to conduct a formal exit meeting.

On July 30, 2024, I received an email from Mr. Rosenbaum that included the SPCC training records (Attachment 7). Also on July 31, 2024, I received an email from Mr. Rosenbaum that included photos of corrective action the facility took based on my observation (Attachment 8). On August 2, 2024, I returned to the site and held a formal exit meeting with Mr. Rosenbaum. I discussed the seven observations I included on the NOPF (Attachment 4). I informed Mr. Rosenbaum that I will communicate all other matters with him upon my further review of the submitted records upon my return to the office.

On August 12, 2024, I received two emails from Mr. Ryan Carpenter that included the facility formal responses to the NOPF (Attachment 6).

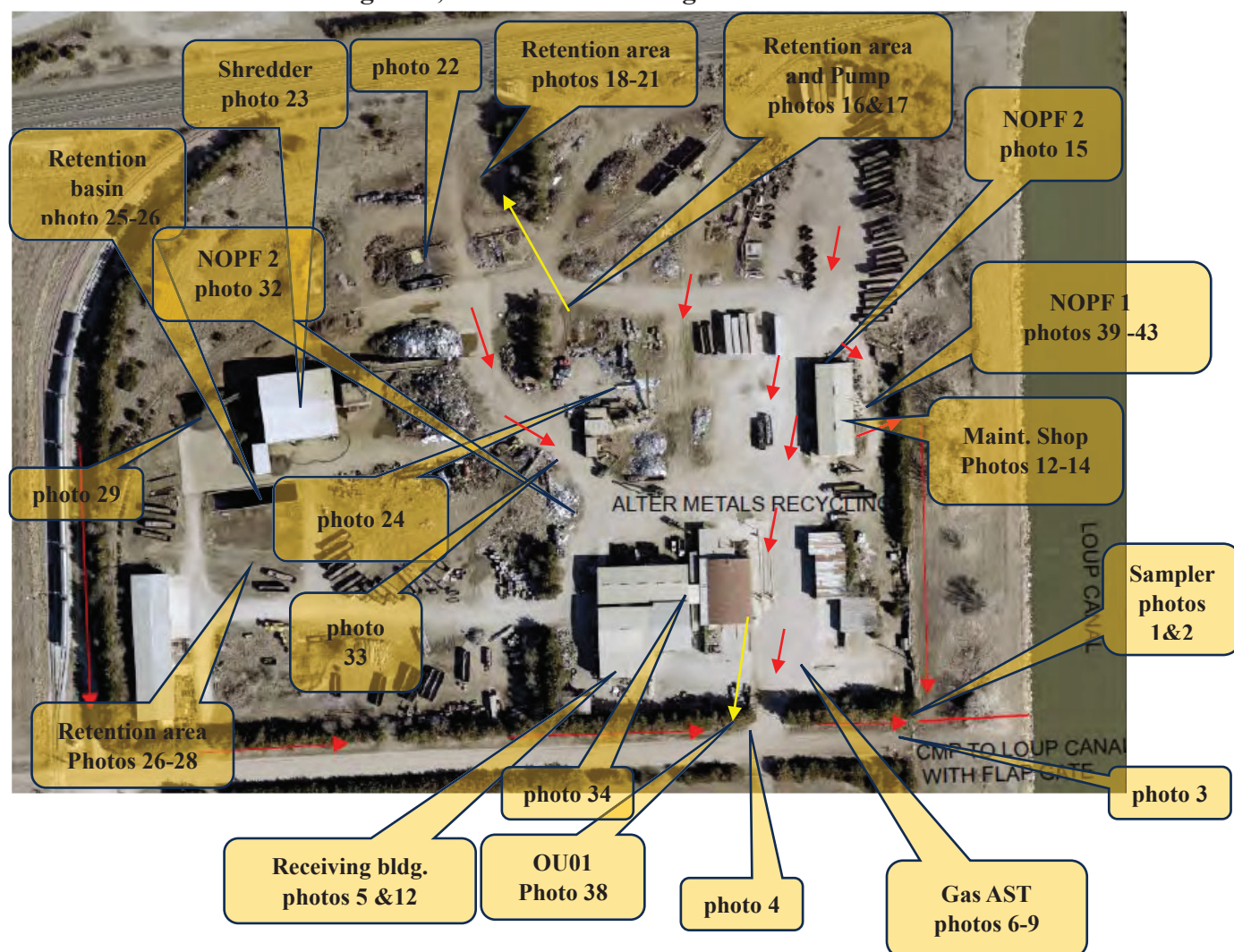
Facility Description

According to Mr. Rosenbaum, Alter Metal Recycling started operation at the site in 2013, but the facility (Columbus Recycling) existed since 1960. Operations on site consist of ferrous and non-ferrous scrap metal recycling averaging 5,000 tons per month. Site activities are outdoor storage of significant materials, vehicle and equipment maintenance, de manufacturing (with petroleum product storage), shredding, fueling, AST liquid storage tanks, loading and unloading of dry bulk materials and liquids, access roads, rail cars and tracks, and fugitive dust from vehicular and equipment traffic. The property consists of approximately 19.5 acres including six large buildings: baler and nonferrous warehouse, offices, maintenance shop, shredder, and equipment washing. On site recycling activities such as shredding and bailing are done indoors. However, storing of metals and equipment parking are conducted outdoors which can cause metal particulates, residual oils, petroleum products, hydraulic fluid, antifreeze, mercury switches, sulfuric acid, cuttings oils, sediment and fugitive dust and particulates, and general refuse (service provided by vendor) to be exposed to stormwater .

Site Drainage Patterns

The site is located 150 feet east of the Loup Canal. Stormwater runoff from the site would generally flows south toward the ditch. Water in the ditch would flow east to the Loup Canal.

Figure 1, Alter Metal drainage Patters



Findings and Observations

All findings and observations of this inspection concern Alter Metal Recycling's status of compliance with the general permit and stormwater management. These findings are based on my interview with Mr. Rosenbaum, my review of the SWPPP, and my visual observations of the site. All observations were discussed in detail with Mr. Rosenbaum throughout the inspection and during the formal exit meeting on August 2, 2024. All photos taken during the inspection on July 30, 2024, are included as Attachment 5 to this report.

1. The Nebraska National Pollutant Discharge Elimination System (NPDES) General Permit (ISW-GP) number ISW-202201042 was issued on October 6, 2022 (Attachment 2), and will expire on March 31, 2027 (expiration date of all ISW-GPs for stormwater discharges associated with industrial Activity to waters of the state of Nebraska).
2. I issued Notice of Preliminary Finding number 1 (NOPF #1) because at the time of the inspection we observed a significant amount of fluids (used oil/hydraulic fluids) on the concrete pad on the east side of the maintenance shop. The spill appeared to be caused by leaking drums and by site personnel conducting vehicle/equipment maintenance outside the maintenance shop without taking any spill control measures. Photo shows the amount of fluid on the ground.

Photo 39, Significant amount of fluids on the ground



We also observed a trace of significant ground discoloration within a few feet from the spill leaving the site from beneath the east fence as shown in photo 42. Mr. Rosenbaum mentioned that he was not aware of such activities taking place.

Photo 42, Evidence of ground discoloration caused leaving the site.



3. I issued NOPF#2, because there were at least two locations where we observed significant ground discoloration (photos 15 and 32).

Photo 32 significant ground discoloration



4. I issued NOPF #3, because there were floatables and trash accumulated at a discharge point upstream from Outfall 01 (photo 30) and at one of the stormwater inlets leading to Outfall 01

(photo 34). In addition, the other stormwater inlet leading to Outfall 01 was completely covered with dirt (photos 35-37). Both stormwater inlets did not have any controls.

5. The SWPPP identifies one outfall as Outfall 01. However, Mr. Rosenbaum identified the discharge point upstream from Outfall 01 as Outfall 02. Both the discharge point and outfall 01 are substantially similar.
6. On-site structural controls include but are not limited to the retention basin behind the shredder building, retention (low) areas, and the turnings bin built from concrete blocks.
7. Nonstructural controls did not exist.
8. The SWPPP was revised in August 2022. The SWPPP included a site map that identified structural and non-structural controls, sources of potential pollutants, drainage patterns, and one outfall as Outfall 01. Overall, the SWPPP appeared adequate and comprehensive. However, implementation of the SWPPP is inadequate.
9. I issued NOPF #4 because Alter Metal Recycling failed to present records of employee training for the 2021, 2022, and 2023 calendar years as required by the ISW-GP and Section 10.0 of the SWPPP.
10. Alter Metal is subject to Sector N – Scrap Recycling and Waste Recycling Facilities (SIC 5093) of the ISW-GP. Sector N of the ISW-GP and Section 11.0 of the SWPPP require Alter Metal to monitor for six pollutants as described in Table 1 below as benchmark monitoring thresholds to determine the overall effectiveness of the stormwater control measures being implemented and to assist in knowing when additional corrective action(s) may be necessary. Benchmark monitoring is required quarterly, by section 6.2.2.2 of the ISW-GP.

Table 1, Sector N-Specific Benchmark Monitoring Values

Parameter	Benchmark Value
Total Suspended Solids (TSS)	100 mg/L
Total Aluminum	0.75 mg/L
Total Lead	Hardness Dependent
Total Copper	Hardness Dependent
Total Zinc	Hardness Dependent
Chemical Oxygen Demand (COD)	120 mg/L

The permittee is required to conduct benchmark monitoring for the listed pollutants for four quarters in the first year of permit coverage, beginning in the first full quarter of permit coverage, and for four quarters in the fourth year of permit coverage (i.e., thirteenth through sixteenth quarters), unless the first quarter of the fourth year of permit coverage occurs on or after the date of permit expiration.

11. Alter Metals Recycling uses an automatic stormwater sampler to conduct Benchmark monitoring. During the inspection, I questioned the adequacy of the installation of the sampler. The sampler was approximately 4 to 6 inches above the surface and appeared that stormwater would not reach the top of the sampler to collect water. Mr. Rosenbaum indicated that he was not familiar how the sampler works. He also mentioned that Mr. Carpenter oversees collecting samples.
12. I issued NOPF #5 because Alter Metal failed to collect quarterly benchmark samples for analytical testing during (at least) calendar years 2021 to 2024 as required by the ISW-GP and Section 11.0 of the SWPPP.
13. I issued NOPF #6 because Alter Metal failed to conduct Routine Quarterly Facility Inspections in the 1st & 2nd quarters in 2024, 3rd quarter in 2022, and all quarters in 2021, as required by the ISW-GP and Section 6.1.2 of the SWPPP.
14. I issued NOPF #7 because Alter Metal failed to conduct Quarterly Visual Assessment of Stormwater Discharges in the 1st & 2nd quarters in 2024, 3rd quarter in 2022, and all quarters in 2021 as required by the ISW-GP and Section 6.1.3 of the SWPPP.
15. Records indicated that Alter Metal conducted Annual Comprehensive site inspection accordingly as required by the ISW-GP and Section 6.1.4 of the SWPPP.

Conclusion

Alter Metal Recycling failed to implement the SWPPP adequately. Improper maintenance of equipment and vehicles activities and poor spill prevention measures caused significant oils and fluids to contaminant the ground and leave the property.

The SWPPP identifies one outfall as Outfall 01. However, during the inspection we observed at least two additional discharge points. The discharge point upstream from Outfall 01 at the south fence line, and the discharge point on the east side of the maintenance shop along the east fence line where we observed trace of oil leaving the site. The SWPPP must identify all discharge points.

Alter Metal should investigate the adequacy of the location of the sampler and its installation.

Alter Metal should ensure future implementation of the SWPPP is adequate to comply with the requirements of the ISW-GP and the SWPPP to collect samples and perform monitoring activities, implement good housekeeping, and spill prevention

NAJI AHMAD
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Naji J. Ahmad
Environmental Engineer, WB/DWIS

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Nicole Moran
Section Supervisor, WB/DWIS

Attachments:

1. R7 SW Checklist
2. NOI & Approval
3. 2022 SWPPP
4. NOPF
5. Photo Log
6. NOPF Response
7. SPCC Training Records
8. Corrective action