REPORT OF INDUSTRIAL STORMWATER COMPLIANCE EVALUATION INSPECTION (CEI)

At

McCoy Iron and Metal
321 N. Fort Ave
Springfield, MO 65802
(417) 866-3707
MO-R60A163

On

November 29, 2022

By

U. S. ENVIRONMENTAL PROTECTION AGENCY
Region 7
Enforcement and Compliance Assurance Division (ECAD)

1.0 INTRODUCTION

I performed an Industrial Stormwater Compliance Evaluation Inspection (CEI) at the McCoy Iron and Metal facility in Springfield, Missouri on November 29, 2022. The inspection was authorized by Section 308(a) of the Federal Water Pollution Control Act, as amended. This narrative report and attachments present the findings and observations made during the Industrial Stormwater CEI.

2.0 PARTICIPANTS

McCoy Iron and Metal: (417) 866-3707
Kim McCoy, Vice President, Administrative Services
Email: kimmccoy@mccoymetal.com
Michael McCoy, Co-Owner/Operator
Greg McCoy, Co-Owner/Operator

Missouri Department of Natural Resources (MDNR)
Ashley McDaniel, Environmental Specialist, (417) 891-4300
Email: Ashley.McDaniel@dnr.mo.gov

U.S. Environmental Protection Agency (EPA):
Joe Heafner, Life Scientist (913) 551-7091
Email: heafner.joseph@epa.gov

3.0 INSPECTION PROCEDURES

On November 29, 2022, I arrived unannounced at McCoy Iron and Metal at 1:00 p.m. and introduced myself to Ms. McCoy. I presented my credentials and explained the scope and purpose of the inspection. I also informed Ms. McCoy that I would be performing a complete Industrial Stormwater inspection. I informed her that the Industrial Stormwater inspection would consist of a visual inspection of the facility and review of records being maintained at the facility. Ms. McCoy introduced her brothers, Michael and Greg, and stated that they owned and operated the facility along with their father. I also introduced Ms. McDaniel of the MDNR and stated that she was there to observe the inspection.

Prior to entering the facility, I conducted a visual reconnaissance of the facility, searching for areas of concern observable from the public roads such as discharges, drainage patterns, flow directions, distance and direction of nearest perennial waters, visual condition of perennial waters, facility location, and layout. The facility is located between North Fort and North Olive Streets with West Water Street forming the north border of the property and Samson Branch forming the border to the south of the facility. An unnamed tributary to Sanford Branch is located east of the facility and flows south into Sanford Branch. Sanford Branch turns into Jordan Creek just south of West College Avenue.

Ms. McCoy stated that she was the Vice President of Administrative Services of the facility and was responsible for the environmental affairs at the facility. I then made Ms. McCoy and Messrs. McCoy aware of their confidentiality rights and informed them that a Confidentiality Notice, which they reviewed, would be provided at the end of the inspection to make any claims. Ms. McCoy acted as the official facility representative during the inspection. Ms. McCoy provided information pertaining to the facility operations while Messrs. McCoy accompanied me during the entire inspection. Ms. McCoy also provided copies of facility records for review and provided additional stormwater management information during the inspection. Ms. McCoy stated that Mr. Wes Dickinson of Dickinson & Associates is contracted by the facility to conduct their routine facility inspections and any sampling required by the permit. After the completion of the inspection, I contacted Mr. Dickinson and requested additional information for the facility.

I explained to Ms. McCoy that I would be conducting the Industrial Stormwater inspection under the authority of Section 308(a) of the Federal Water Pollution Control Act to evaluate the facility's compliance status with the requirements of the Clean Water Act and with Industrial Stormwater Permit (MO-R60A163) issued by the Missouri Department of Natural Resources which covers stormwater discharges from industrial activities associated with metal recycling facilities. I explained that the inspection would consist of a review of facility operations, required records, the Stormwater Pollution Prevention Plan (SWPPP), and a visual inspection of the facility. I stated that I would document my findings and observations by making photocopies, taking photographs and/or videos, and obtaining statements from facility staff.

I conducted this inspection in accordance with the procedures described herein and the following all applicable EPA Region 7 Standard Operating Procedures (SOPs), unless otherwise noted.

I completed my inspection, and I summarized the findings and recommendations with Ms. McCoy during the exit briefing. Ms. McCoy acknowledged receipt of the Confidentiality Notice,

which she signed indicating no confidential business information had been provided during the inspection (attachment 1). No samples were taken during the inspection, and no Notice of Preliminary Findings (NOPF) was issued during the inspection. Twenty-two photographs were taken during the inspection. See attachment 2 for the digital photograph chain of custody/photo log and photos #1 - #22.

4.0 FACILITY DESCRIPTION

4.1 Facility Operations

The facility is located west of downtown Springfield, Missouri, along North Fort Avenue. The facility's physical address is 321 North Fort Avenue, Springfield, MO 65802. The legal description of the facility is the NW ¼, of Section 23, T29N, R22W, Greene County Missouri. McCoy Iron and Metal is a metal recycling operation. According to the National Pollutant Discharge Elimination System (NPDES) permit, the facility has two Standard Industrial Classifications (5015 Motor Vehicle Parts, Used 5093 Scrap and Waste Materials). The facility collects used vehicles, removes the fluids, then crushes the cars for recycling. The facility also collects and recycles various ferrous and non-ferrous metals, electronic scrap, and batteries.

Ms. McCoy stated that the facility has approximately 30-35 employees and that the facility runs 8 hours a day, Monday - Friday. See attachment 3 for the facility layout, photo locations, and stormwater flow patterns. Stormwater from the facility flows into a non-discharging stormwater basin located in the southeast corner of the facility. The NPDES permit and Stormwater Pollution Prevention Plan (SWPPP) identify three potential stormwater outfalls at the facility.

Regulatory History

MDNR issued a NPDES permit to the facility on October 1, 2021 (attachment 4). MDNR last inspected the facility on October 15, 2014 (attachment 5) and found that the facility was in non-compliance for not following conditions in the permit.

The City of Springfield Missouri, as part of the Municipal Separate Storm Sewer System (MS4) program, conducted an inspection of the facility on June 21, 2021 (attachment 6) and found stormwater deficiencies at the facility. On March 29, 2022, a Notice of Violation was issued by the City of Springfield, Missouri for failure to conduct a Best Management Practice analysis that was required in the June 21, 2021 inspection report (attachment 7). The facility submitted the required report on April 8, 2022, and continues to work with the City of Springfield and MDNR to update the stormwater management at the facility.

5.0 FINDINGS AND OBSERVATIONS

On November 29, 2022, I conducted an Industrial Stormwater inspection to determine if McCoy Iron and Metal is in compliance with their NPDES General Permit. The weather conditions at the time of the inspection were cool and clear (45°F). The facility and surrounding area received brief periods of rain showers preceding the inspection. I met with Ms. McCoy and Messrs. McCoy, performed a visual inspection of the facility, reviewed operating permit requirements, and reviewed records being maintained by the facility.

5.1 Stormwater Pollution Prevention Plan (SWPPP)

The NPDES General Permit does require that the facility have a SWPPP. I was provided a complete copy of the SWPPP. After reviewing the complete copy of the SWPPP, I placed the copy into the ECAD electronic file system. A partial copy of the SWPPP is provided as attachment 8. According to Ms. McCoy, the facility updated the SWPPP in early 2022. I reviewed the SWPPP during the inspection and found that it was complete and met the requirements of the NPDES permit for a SWPPP.

The SWPPP and permit require routine inspections of the stormwater structures and best management practices implemented by the facility. During the inspection, I reviewed inspection records from 2020 through the present. After the completion of the inspection, I contacted Mr. Wes Dickinson of Dickinson and Associates, who acts as a consultant for the facility and requested electronic copies of the inspection reports from the timeframe reviewed. Mr. Dickinson provided copies of the requested documents. I reviewed the inspection reports then placed them in the EPA Region 7 ECAD electronic file system. I noted during the review that the inspection report that Mr. Dickinson provides to the facility is not as comprehensive as the inspection report form in the SWPPP. I recommended to Ms. McCoy that the inspection report form in the SWPPP be utilized in the future.

The permit provides benchmark targets for pollutants including Total Suspended Solids, Aluminum, Iron, Lead, and Oil and Grease. These benchmarks are not effluent limits and according to the permit there is not a requirement for routine sampling of these benchmarks. According to the permit, the benchmarks are there to help a facility to evaluate the effectiveness of any BMPs that the facility has implemented to be compliant with the permit. During the inspection, Ms. McCoy stated that the facility has not conducted routine benchmark sampling at the facility.

The SWPPP also requires that the facility maintain records of all SWPPP trainings that the facility has performed. Training records were not available during the inspection. Ms. McCoy stated that they have not documented if training has been completed. During the inspection, I showed her the section of the SWPPP that has the training requirements and how the SWPPP requires that the training be conducted and documented.

5.2 Other Visual Observations

During the facility tour, I observed the stormwater flow paths throughout the facility and the three listed stormwater outfalls (photos 1-16). I noted that in general, stormwater runoff from throughout the facility flows in a southeasterly direction into the stormwater retention pond located in the southeast corner of the property.

I also noted that there was a small amount of staining on the ground behind the fluid recovery area on the west side of the property (photo 3). I observed the west side of the fence during the inspection, and the area did not indicate that oil or other petroleum products were flowing off site (photo 19).

Mr. McCoy explained that they had been working to redirect all flow toward the basin. He noted that they had recently reworked the entrance along the west side of the property to direct flow towards the basin (photos 1-2 & 6-8).

I observed the stormwater retention basin during the inspection (photos 9 & 12). I noted that the stormwater retention basin was designed to act as a no-discharge basin, however, if the basin was to overflow, it would overflow in the southeast and southwest corner then flow directly into Sanford Branch. Mr. McCoy stated that the facility is in the process of purchasing a screening system that would keep debris and other pollutants out of the retention basin. Post inspection, I contacted Ms. McCoy for information on the screening system. Ms. McCoy provided the drawings of the screening system (attachment 11). On January 23, 2023, I received an email from Ms. McCoy stating that it would be mid-March 2023 before the screening system is in place (attachment 11).

I observed Sanford Branch during the inspection. I noted that the streambed was free of solids or other debris from the facility, however there was observable debris (trash) along the channel. Sanford Branch turns into Jordan Creek south of W. College Avenue. I completed an EPA Stream Characteristics and Water Nexus Form for Sanford Branch/Jordan Creek (attachment 9 and photos 18 & 22).

No additional specific information was requested during the exit briefing. See attachment 10 for the NPDES Industrial Stormwater Worksheet.

6.0 SUMMARY

A NOPF was not issued to McCoy Iron and Metal during the inspection.

The facility permit requires that the facility have an SWPPP. A review of the SWPPP was made and noted that the SWPPP meets all the requirements of the NPDES Permit. Although, the SWPPP meets the permit requirements, McCoy Iron and Metal has not implemented all requirements of the SWPPP including the training of staff on the requirements of the SWPPP. During the inspection, I recommended that the facility utilize the inspection report template that is in the SWPPP as it is a more comprehensive inspection report than the current inspection form.

The facility is continuing to work with MDNR and the City of Springfield to improve the stormwater management at the facility.

JOSEPH HEAFNER
Digitally signed by JOSEPH HEAFNER
Date: 2023.01.27 13:21:18 -06'00'

Joe Heafner
Life Scientist

NICOLE MORAN
Digitally signed by NICOLE MORAN
Date: 2023.01.27 13:47:33 -06'00'

Nicole Moran
Section Chief

ATTACHMENTS:

1. Confidentiality Notice (1 page)
2. Digital Photograph Image Chain of Custody/Photo Log and Photos #1 - #22 (13 pages)
3. Facility Satellite Photos, Drawings, and Topographic Maps (1 pages)
4. NPDES Permit MO-R60A163 (9 pages)
5. MDNR Inspection Report from October 15, 2014 (9 page)
6. City of Springfield inspection report from June 21, 2021(5 pages)
7. City of Springfield NOV (4 pages)
8. Partial SWPPP (27 pages)
9. EPA Stream Nexus (2 pages)
10. Industrial Stormwater Checklist (6 pages)
11. Site Saver drawings and email chain from Ms. McCoy (12 pages)