NPDES Storm Water Inspection Report

Background Information

National Database Information	
Inspection Type	**Industrial**
WDID Number	**2 41S005107**
Inspection Date	**03/04/2011**
Inspector Type	**EPA**
Facility Type/SIC	**5093 – Recycling scrap and waste material**

General	
Inspector Name	**Luis Garcia-Bakarich** **David Wampler**
Telephone	**415-972-3237 (LGB)** **415-972-3975 (DW)**
Entry Time	**0910 hours**
Exit Time	**1430 hours**
Signature	**Original Signed**

Facility Location Information				
Name/Location/ Mailing Address	**Sims Metal Management (Sims)** **699 Seaport Blvd.** **Redwood City, CA**			
GPS Coordinates	Latitude	**37° 30' 40.6"**	Longitude	**122° 12' 29.6"**
Receiving Water(s)	**Redwood Creek – Navigable estuary to San Francisco Bay**			
	Name		Telephone	
Owner	**Steven Shinn – Regional General Manager**		**510-412-5300**	
Operator	**Joe Barco – Operations General Manager**		**510-412-5300**	
Environmental Coordinator	**Matt Zeiter – On-site Rep**		**510-715-7569**	

Basic Permit Information *(bold one)*		
Permit Coverage	**Y**	N
Permit Type	**General**	Individual
SWPPP on Site?	**Y**	N
Copy of permit on site?	Y	N

Summary Site Evaluation*	
Permit Coverage	**U**
SWPPP *(field review)*	**U**
Records *(review includes maintenance, inspection training logs)*	**S**
SWPPP *(implementation)*	**M**

*Use the following codes: (S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Evaluated)

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General	
Inspection Objective, Attendees, and Opening Conference Summary.	The inspection's objective was to determine compliance with the California Industrial General Permit No. CAS000001. In addition to EPA inspectors previously identified, the inspection was attended by Estuardo Montufar (650.372.6240) and Sabrina Mih (650.372.6235) with San Mateo County Environmental Health Services Division (Certified Unified Program Agencies – CUPA), and Matt Zieter (510.412.5300), Mariya Semeit (650.369.4161), Dale Leuer (650.369.4161), and Vistasp Patel (650.369.4161) with Sims Metals Management (Sims or Facility Representatives) Prior to commencing the inspection, an opening conference was held in the facility's office where EPA inspector Garcia-Bakarich presented EPA credentials to facility representatives and explained the planned inspection's purpose and scope. The inspection participants exchanged business cards. The inspectors performed an initial review of the SWPPP and monitoring reports, and obtained copies of the SWPPP and site map from the facility's representatives.
Industrial Activity	SIC 5093 – Scrap and Waste Material: assembling, breaking up, sorting, and wholesale distribution of scrap and waste materials Activities or evidence of activities observed during the inspection include material receiving, handling and storage, metal shredding, vehicle and equipment maintenance, and marine cargo handling.
Facility Description	EPA bases the following facility description on observations made by EPA inspectors, discussions with CUPA and Sims representatives while on site, and review of documents supplied by the facility. The facility is approximately 12.9 acres, and a containment berm and security fence with five gates bound its perimeter. There are approximately a dozen buildings on site with uses ranging from offices to materials processing and equipment maintenance. The facility has two developed ponds (Ponds 1 and 2) and a newly developed onsite sewer system for storm water and process water management. Large trucks enter the facility by the main gate (north east corner) with bulk loads of metal scrap and waste, and dump their loads in the material-appropriate location. Facility personnel then sort and grade the loads. (Facility personnel stated that some haulers augment their loads with soil and/or rock, in which case facility personnel apply a deduction to the load's value; facility personnel may also remove some materials such as gas cylinders from processing lines to assess them for hazardous conditions or potential reuse.) EPA inspectors observed (as noted in the site map) that the facility segregates materials into several categories including, ferrous and non-ferrous materials, "e-waste" (such as circuit boards), appliances, non-metallic waste (ie. dirt/rock), and auto shredding residue. Desired materials are shredded and the processed materials are stockpiled until they are loaded for other destinations. According to facility representatives, this facility is the only Sims facility in northern California with a metal shredder. The shredder was observed but not operating the day of the inspection. A ship loading conveyor moves shredded ferrous materials from the stockpile in pond 2 to ships. The conveyor extends beyond the facility's perimeter containment berm to a dock. Risers located outside of the perimeter's containment berm support the conveyer's aerial portions. Some of the supports have footings within Redwood Creek. The facility representatives stated that the docks were common areas under the responsibility of the Port of Redwood City and for this reason, facility representatives stated that the SWPPP did not address those common areas. Sims has exclusive use of the ship loading conveyor, its structure, and a catchment platform that lies underneath the ship loading

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	conveyor's over-water portion. The catchment platform spans from the shore of Redwood Creek to the common dock. The barrier walls that bound the catchment platform catch a measure of the debris that falls from the ship loading conveyor during loading and maintenance activities. Sims uses a smaller conveyor belt on the shore (east) side of the catchment platform to clear accumulated debris. During the inspection, inspectors did not observe facility personnel loading any ships or conducting any maintenance activity on the conveyor. Inspectors also observed other features on the facility that included: an uncovered equipment maintenance area near the employee break room, an equipment washing area with a rinsate collection and treatment system, a fueling and oiling depot with covered above-ground storage tanks (ASTs), and an appliance processing area where facility personnel relieve appliances of materials requiring special handling (such as CFCs. Oil, capacitors, and/or mercury containing switches) for future disposal, prior to being shredded.

Storm Water Controls	
List the structural and non-structural controls employed by the facility.	Structural: - Perimeter containment berms (observed); - On-site storm sewer system w/ storage ponds (observed); - Equipment wash rinsate collection and treatment (observed); - Dust suppression features such as "Rain Bird" and "Dust Hog" sprinkle or mist water onto working areas to suppress dust emissions and a dust screen along the perimeter fences was being installed to reduce fugitive emissions that may settle beyond facility site controls and become entrained with storm water discharges (observed); - Catchment platform underlying the ship loading conveyor to catch some falling debris from discharging to Redwood Creek. (Not identified as a storm water control in the SWPPP) (observed); and - Deployment of tarps along the ship loading conveyor's supporting structure when maintenance activities occur (and possibly during loading activities, but not clarified at the time of inspection) to direct falling debris to the catchment platform (reported). (Not identified as a storm water control in the SWPPP) Non-Structural: - Storing materials and waste (both hazardous and non-hazardous waste) in appropriate, labeled containers for use or later disposal (observed); - Regular sweeping (observed); - Spill response measures (observed); - Employee training (reported); and - Inspections (reported).
Are the controls reasonable and appropriate for the facility?	The perimeter berm was not continuous, and not all-encompassing of facility-related activities. IMGP0232 demonstrates a break in the perimeter berm near the southeast emergency gate, and IMGP0273 also demonstrates a break in the perimeter berm near the northwest gate. IMGP0241 demonstrates facility-related utility work outside of the perimeter berm to the west of building B, adjacent to Herkner Rd. IMGP0242 and 0244 demonstrate ship loading activities also outside of the containment berm. The facility needs to make additional efforts to accomplish a continuous perimeter berm. The facility needs additional controls, which were either not identified by facility personnel or employed at the time of the inspection, to address activities occurring beyond the berm. The on-site storm sewer system and the storage ponds are appropriate for a facility that intends to have complete capture of storm water within the perimeter berms. The equipment wash rinsate collection and treatment system is an appropriate system for removing site pollutants from equipment that will be exposed to storm water and

	eliminating the discharge of rinsate. This may also be an effective means of treating rinsate from other housekeeping activities, but was not reported to be used as such at the time of inspection. Dust suppression is reasonable and appropriate for facility activities, except that inspectors did not see "wetting" dust suppression employed during the inspection, which would prevent the off-site deposition of fugitive dust emissions (due to settling or being tracked out). See IMGP0197 and 0198. Different activities will have different levels of dust generation, from small and infrequent events to large and continuous events. Inspectors observed two dust generating activities that are presumably small, but constant, generators during facility operations: unloading of dump trucks and movement of materials within the facility. Inspectors were not able to assess the dust screens' effectiveness at the time of inspection, so the facility should monitor this feature to determine its effectiveness for site-related pollutants. Proper waste storage and management are appropriate pollution controls for a generator such as Sims because the facility employs a fleet of heavy equipment and operates a stationary mill that requires regular maintenance with hydrocarbon products such as lubricating oils and grease, and regularly comes into possession of hazardous waste via the dismantling process. Facility activities generate dust and regular sweeping is an appropriate means of controlling dust to reduce storm water discharges. Despite indications that sweeping occurs, the inspectors made numerous observations of dust on the driving surfaces that could be tracked off-site (IMGP0199, 0200, 0226, 0228, 0230, 0232, 0236, 0237, 0238, and 0302). A facility spill response plan is an appropriate control for minimizing potential impacts from spills. Inspectors observed at least four (4) active or recent small oil spills and numerous previous small spills that had been addressed by absorption with rags or clay-type absorbent (IMGP0209 – 0218 and IMGP0290 – 0293). Inspectors observed active spills discharging directly to the ground and did not observe that facility personnel had responded by employing containment measures, e.g., drip pans. (IMGP0209, 0211, and 0290). Inspectors acknowledge the active spill depicted in IMGP0290-0293 occurred within what facility personnel represented was a containment basin. Inspectors also observed residual oil staining throughout the facility, and noted that oil residues can be tracked off the facility and later entrained in storm water discharges. Employee training and facility inspections are appropriate business practices for preventing storm water pollution. Inspectors did not acknowledge that the catchment platform that underlies the ship loading conveyor is adequate to prevent or minimize the discharge of pollutants in storm water to Redwood Creek. While the platform appears to control some direct discharges of pollution to Redwood Creek during operation of that segment of the conveyer's span that extends directly over the Creek, inspectors observed debris under other segments of the conveyor's entire span, including debris from the span deposited directly adjacent to a storm drain that discharges to Redwood Creek (IMGP0244, 0253, 0254, and 0270-0272), and debris deposited beyond the extent of the catchment platform (IMGP0255-0259, 0261 and 0263-0267). Additionally, the catchment platform itself lacks storm water discharge controls to minimize or prevent pollutants in storm water from discharging from the platform to the Creek.
Are the controls maintained in effective operating	The portions of the perimeter containment berm that were established and functional appeared to be maintained in effective operating condition. As noted above, the berm was not continuous and may not serve to effectively contain all storm water discharges from the site. The newly-installed on-site storm sewer system's operational condition was not fully

condition?	assessed. Inspectors observed covers on most of the inlets might prevent the introduction of debris (IMGP0230, 0236, 0238, and 0240), though it was unclear if the coverings might also impede the flow of storm water into the inlets. The ponds appeared to be retaining (or detaining?) water as designed, with the potential for greater capacity. IMGP0242 depicts minor seepage along pond 2's western berm. Site contouring would appear to direct any significant seepage to the storm sewer collection system, and subsequently back into the pond. Inspectors observed facility personnel washing a sweeper, and observed collection of the rinsate for treatment (IMGP0224 and 0225). Inspectors observed dust suppression controls, except "wetting" dust suppression was not observed in operation. As stated above, material and waste storage practices did appear appropriate and effective to minimize exposure of pollutant sources to storm water. Inspectors observed sediments with potential for track-out throughout a significant portion of the facility's driving surface area, despite representations made to inspectors that regular sweeping occurs. The sweeping that occurs is not sufficient to minimize the discharge of pollutants from track out. Inspectors observed multiple spill kits throughout the facility, and absorbent deployed in multiple locations. A significant amount of residual oil staining observed at the facility indicates that spill response measures and leak detection practices may not be adequate to sufficiently minimize the discharge of pollutants resulting from the track-out of oil residue or from leaking equipment parked, staged, or operating beyond the perimeter containment berm. Facility personnel provided training logs and syllabi for review during the inspection. Inspectors did not request copies during the inspection. Inspectors reviewed the facility inspection reports required by the permit, and found the reports were incomplete since the reports' focus was limited to only those areas within the perimeter containment berm, and did not address areas outside the perimeter containment berm where industrial activity and associated pollutant sources could also result in the discharge of pollutants in storm water to the Creek, such as from operation of the ship loading conveyor, its underlying catchment platform, and from the operation and maintenance of equipment associated with these industrial activities. As previously discussed, the ship loading conveyor's catchment platform was poorly maintained, and gaps in the containment wall were not cleared of debris (IMGP0262).
Good House-keeping	The facility appropriately stored and segregated hazardous materials, such as the gas cylinders, except for the leaking drum previously discussed. Although sweeping occurs, inspectors observed sediment-laden vehicle tracks on the driving surfaces throughout the facility. Deployment of spill absorbents was inadequate: 3 of 4 recent spills had absorbent deployed, and 2 of the 3 (IMGP0211-0212 and 0290-0293) had insufficient absorbent deployed (IMGP0209, 0210, and 0213 depict an unaddressed active spill). Facility personnel took additional spill response measures upon identification of the deficiencies by the inspection team. The facility segregated materials into piles depending on the nature of the materials. Inspectors observed facility debris beyond the perimeter containment berms such as ASR and disturbed soils from recent utility work. IMGP0259 shows equipment track out on the dock (captured by IMGP0242 and acknowledged by facility representatives during the inspection as a minor cleanup project), and IMGP0270 thru 0272 show unaddressed debris migrating towards a storm drain between the perimeter containment berm and the facility fence.

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Miscellaneous	
Non-Storm Water Discharges	The facility uses water for dust suppression and for wetting material on the ship loading conveyor. Facility personnel stated that they currently use potable water for this purpose, however, with their new storm water retention system they plan to continuously recycle captured storm water and other water (potable and process) for dust suppression. Facility personnel discussed operation and maintenance of their ship loading conveyor, and represented they clear debris from the conveyor and supporting structure in such a way that the debris falls from the aerial portions to catchments or the ground below. Facility personnel represented they deploy tarps to reduce fugitive discharges from the segment of the conveyer that spans Redwood Creek, but were unclear as to whether they deploy the tarps during operation and maintenance activities, or only during maintenance activities. Despite the efforts to capture falling debris from the conveyer described by facility personnel, inspectors observed accumulations of rust-colored debris material on pilings, catchment platform supports, and the catwalk immediately over Redwood Creek (IMGP0255 thru 0269).
Any evidence of Non-Storm water Discharge?	Inspectors did not observe active non-storm water discharges during the inspection. However, IMGP0255-0269 shows rust-colored debris perched over or submerged in Redwood Creek indicating non-storm water discharge or potential discharge.
Do the storm water inlets correspond with site map?	The site map has no storm water inlets indicated. The site map should identify all storm drain inlets or other storm water outfalls that are on or adjacent to the facility, including inlets located at adjacent facilities or areas owned or operated by other tenants or the Port of Redwood City.

Notes
Redwood Creek is navigable in fact, and a traditionally navigable water.
The on-site storm water collection system appears designed to capture storm water discharges from vehicles and equipment parked or staged throughout the facility and within the perimeter containment berm. Inspectors observed a wheeled piece of equipment with a boom and a magnet parked on Herkner Rd to the north of the ship loading conveyer (IMGP0243). Sims presumably owns this piece of equipment, but this fact was not clarified at the time of the inspection. The SWPPP should describe control measures to address pollutants that discharge from vehicles and equipment parked, staged, or operated outside of the perimeter containment berm during a period of time when there is a reasonable chance of precipitation. This issue was not discussed during the inspection nor was it addressed by the SWPPP.
CUPA inspectors left the facility immediately prior to the remaining inspectors' inspection of the common dock and the ship loading conveyor's underlying catchment platform.
Discharges of facility-generated debris to Redwood Creek are a potential discharge of pollutants to waters of the U.S. Discharges of pollutants onto the ground that are picked up and transported via storm water and non-storm water to the Port of Redwood City's storm water sewer system are a potential discharge of pollutants to an MS4 and waters of the U.S.
Track-out was not discussed during the inspection, however upon review of observations, photographic evidence, and the lack of fence-line decontamination, it is clear that the facility's track-out controls are a concern.

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SWPPP Review *(can be completed in office)*

General			Notes:
Does the SWPPP contain the signature of a responsible party?	**Y**	N	
Is an individual/team responsible for developing/implementing SWPPP identified (e.g. pollution prevention team)?	**Y**	N	**Facility personnel and private contractors were identified as the constituents of the team.**

Site Map and Narrative			Notes:
Is there a site map?	**Y**	N	**Inspectors received two versions. One dated 4/7/09 from the SWPPP and another (undated) that Sims generated for a recent infrastructure development project but which was not necessarily intended to demonstrate storm water controls.**
Drainage patterns/ outfalls?	Y	**N**	**Facility-generated site maps show drainage patterns, and reflect ongoing revisions to incorporate the on-site storm sewer system. However, the site maps fail to depict or discuss outfalls that convey site pollutants from the facility to Redwood Creek.**
Identification of types of pollutants likely to be discharged from each drainage area?	Y	**N**	**The facility does not discharge according to the site map, so types of pollutants are not discussed. The site map does not depict or address areas beyond the perimeter containment berm, or pollutants sources in those areas.**
Location of major structural controls used to reduce pollutants in runoff?	**Y**	N	**Locations of depicted major structural controls are accurate at the scale of the map. The facility recently upgraded the major structural controls (perimeter berm is now concrete and ponding areas are now developed ponds) and the map is in the process of being updated. The ship loading conveyor's underlying catchment platform is not depicted.**
Name of receiving water(s) listed?	**Y**	N	**Redwood Creek.**
Location of significant materials exposed to storm water?	Y	**N**	**The majority of significant materials located on-site that are exposed to storm water are appropriately noted on the map, except that the ship loading conveyer's underlying catchment platform, which holds significant materials, and which is exposed to storm water, is not identified on the site map. The site map adequately depicts covered areas.**
List of significant spills and leaks, description of response taken, and actions to prevent similar spills in the future?	Y	**N**	**Facility reported no significant spills. Facility reported that spills were all small and did not trigger regulatory reporting thresholds. The response measures are identified in the SWPPP, and the small spills observed by inspectors were ultimately addressed in accordance with those measures. Similar spills are a result of the facility's ongoing equipment maintenance needs, and these spills' impacts can be better addressed.**

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Location of fueling, maintenance, loading and unloading, material storage, waste disposal?	**Y**	N	**All of these aspects are discussed in the SWPPP and depicted on the site map.**

Summary of Potential Pollutant Sources			**Notes:**
Description of activities, materials, features of site with potential to contribute significant amounts of pollutants to storm water?	Y	**N**	**All the activities and materials discussed in the SWPPP are within the perimeter containment berm and have very little potential to discharge from the site, except that the ship loading conveyor and its underlying area (catchment platform and Herkner Rd/rail road spur), and the operation and maintenance activities associated with the ship loading conveyor, are not identified as potential sources of pollution in storm water.** **Additionally, industrial activities associated with the parking, staging, and/or operating facility equipment outside of the perimeter containment berm are not addressed as potential sources of pollution in storm water.**

Storm Water Controls			**Notes:**
Does the SWPPP describe the *non-structural* controls that will be used to prevent/reduce discharge of pollutants in storm water runoff?	**Y**	N	**A short and incomplete section describes some of the non-structural controls to prevent/reduce discharges. Other elements of the SWPPP such as (but not limited to) sweeping and spill response measures can be considered non-structural controls, and should be, at a minimum, itemized in this section.**
Does the SWPPP describe the *structural* controls that will be used to prevent/reduce discharge of pollutants in storm water runoff?	**Y**	N	**The SWPPP relies primarily on the perimeter containment berms as a structural control.** **As stated previously, the catchment platform that underlies the ship loading conveyor and the associated deployment of tarps are structural controls that should be itemized as such. Additionally, the storage ponds, the onsite sewer system, the covered areas such as the fuel depot and process buildings, and the equipment wash rinsate treatment system should all be itemized in this section.**
Does the SWPPP describe other controls that will be used to prevent/reduce off-site tracking or blowing of sediment, dust and raw, final or waste materials, or other solid materials and floating debris?	**Y**	N	**The SWPPP describes sweeping and dust suppression.** **However, the SWPPP is deficient because it does not address the discharge of pollutants in stormwater from equipment and vehicles parked, staged, or operated outside of the perimeter containment berm, and because it does not address the discharge of pollutants from industrial activities that occur directly over Redwood Creek, or that discharge from other conveyances to the Creek.**
Does the SWPPP incorporate baseline controls (good housekeeping, minimizing exposure, PM, spill prevention/response procedures,	**Y**	N	**The SWPPP incorporates baseline controls.**

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routine inspections and comprehensive site evaluations, employee training, sediment and erosion control, runoff management)?			
Does the SWPPP contain completed inspection reports/logs regarding reportable implementation baseline controls?	**Y**	N	**The SWPPP has completed reports and logs, however, they are insufficient because they do not address the discharge of pollutants from industrial activities that occur outside of the facility's perimeter containment berm.**
Does the SWPPP describe the pollutant or activity to be controlled by each selected control and provide an implementation schedule?	**Y**	N	**Table 3 presents this information.**

Non-Storm Water Discharges			**Notes:**
Does the SWPPP describe methods to prevent non-storm water discharges?	**Y**	N	**The SWPPP states that no non-storm water discharges have been detected, and if they ever are detected, measures will be taken at that time. Furthermore, the SWPPP states that the established BMPs will function to prevent non-storm water discharges. However, IMGP0255-0269 shows rust-colored debris perched over or submerged in Redwood Creek indicating non-storm water discharge or potential discharge that has not been prevented.**
Does the SWPPP describe the monitoring process for non-storm water discharges (quarterly dry weather screening)?	**Y**	N	**The monitoring component of the SWPPP does discuss quarterly dry weather screening, however it is insufficient in its scope since it only focuses on the facility and not the extent of the actual industrial activity.**

Monitoring			**Notes:**
Is the Facility conducting monitoring as required (montly wet weather observations, twice yearly sampling)?	Y	**N**	**The SWPPP and the annual reports state that no storm water discharges occur and therefore perform no sampling. At least two (2) areas were observed where storm water discharges can reasonably occur regularly.**
Does the SWPPP discuss benchmark monitoring and responses to any monitoring with results over benchmark values?	**Y**	N	**The SWPPP identifies the benchmark parameters, but not their target values. The SWPPP also discuss evaluating BMPs for adequacy as a follow-up measure to compliance evaluations.**

Photograph Log	
	See Attachment 1.

ATTACHMENT 1

Photograph Log for EPA's 3/4/2011 Site Visit to Sims Metal Management – Port of Redwood City, California

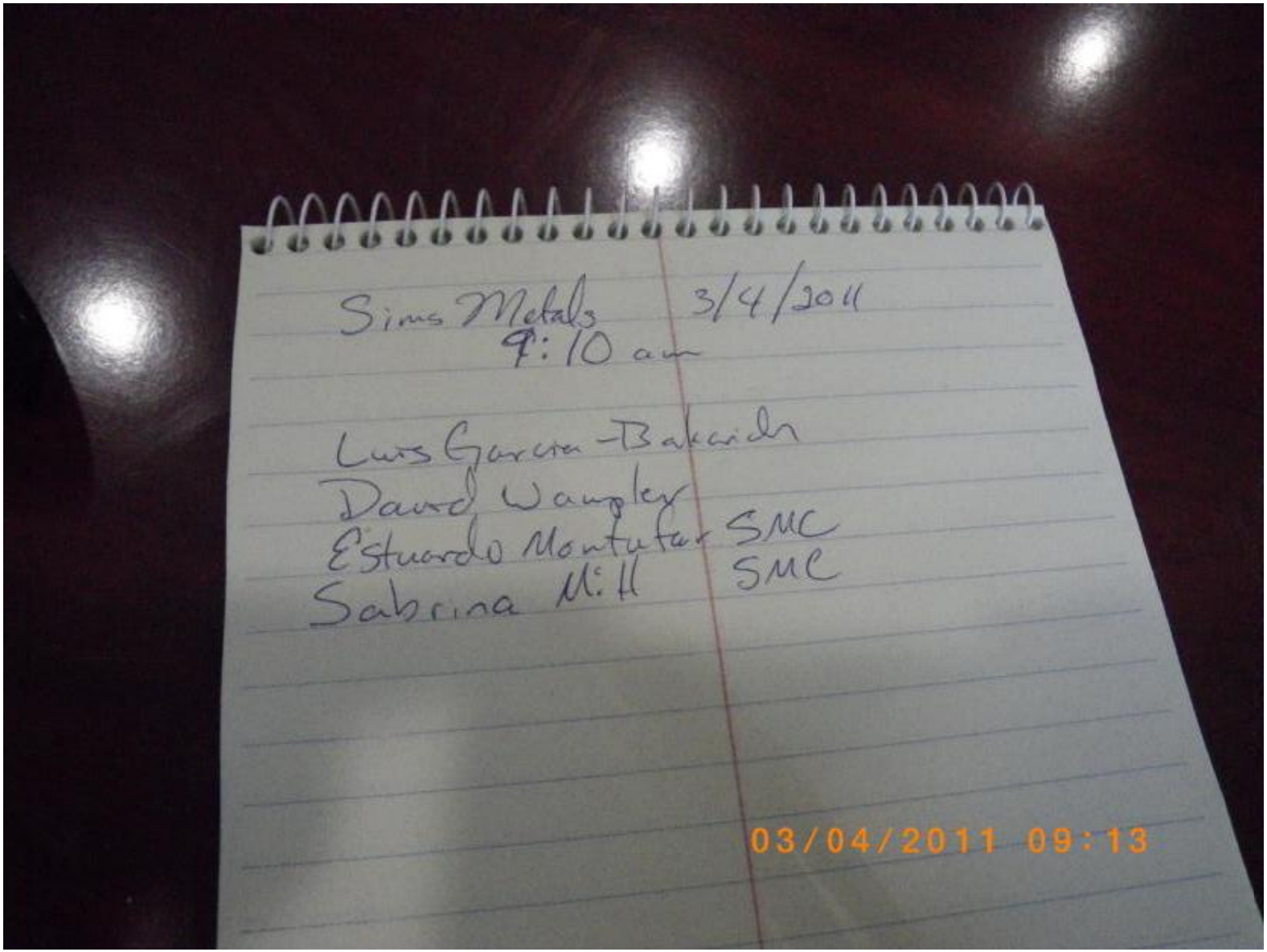
All photographs were taken with a digital camera by Luis Garcia-Bakarich, CWA Compliance Office, EPA Region IX.

IMGP0193 – Title shot.
IMGP0194 – Sump-pump to the east of the main office, this area collects storm water from the entrance scale.
IMGP0195 – Employee parking area to south and west of offices. Two trucks are unloading materials. There is a yellow boom from a grapple/magnet rig (middle background), and a rubber tired loader (left background). Photo was taken looking west.
IMGP0196 – Silver-sided building in the center is the appliance receiving location. Refrigerators, washers, dryers, etc are delivered at this location for dismantling and scrap preparation. IMGP0302 depicts a pile of appliances to the south of the silver-sided building.
IMGP0197 – Rubber-tired loader is moving shredded metals to a pile within pond 2. (Note: rust-colored dust was observed being generated by this operation.)
IMGP0198 – Same location and activity as IMGP0197, and observed dust generation.
IMGP0199 – Standing just to the west of the employee parking area and looking south. A truck with flattened vehicles is preparing to deliver materials to the metal shredding facility in the background. Pile of shredded metal is to the right in the photo, and pile of materials to be shredded is to the left of the photo. Ponded water and tire tracks were observed on the driving surface.
IMGP0200 – Pile of shredded metal in pond 2 with idle grapple rig and bucket for loader. Track-out was observed from pond 2.
IMGP0201 – Containment berm and pond 2 with over-flow catchment drain (with metal grate, to the left of the images next to the two buckets). The electric box to the right of the image and the two round cement features are pumps to control the flow of water between ponds 1 and 2, and the storm water collection system.
IMGP0202 – Pond 2, looking south west at the shredded metal discharge conveyor (left). The ship loading conveyor is to the right in the background.
IMGP0203 – Northwest corner of pond 2 with drain inlet in the foreground and drive-over berm for the loader to access piles within pond 2. Pond water track-out was observed.
IMGP0204 – Maintenance area (southwest corner looking north. Acetylene tanks, work tables, and parked equipment are depicted. Oil staining was observed.
IMGP0205 – Maintenance area; secondary containment equipped storage shed with barrels of new and used oil.) Oil staining and accumulated fugitive absorbent material was observed at the shed opening.
IMGP0206 – Close-up of hazardous waste label on the waste oil drum depicted in IMGP0205.
IMGP0207 – Maintenance area; secondary containment equipped storage shed that contains the maintenance area's "spill-kit". Accumulated fugitive absorbent material at the opening of the shed was observed.
IMGP0208 – Maintenance area, northwest corner looking east; area is bermed and accumulated debris (absorbent material and trash) was observed.
IMGP0209 – Hydraulic table in the maintenance area (the table in the center of IMGP0204) with significant oil staining observed on the ground and active leaking oil observed.
IMGP0210 – Hydraulic oil drips that were observed discharging to the ground from the hydraulic table depicted in IMGP0209.
IMGP0211 – Maintenance area, leaking oil from loader was observed on the ground.
IMGP0212 – Maintenance area, oil staining and deployed absorbent was observed.
IMGP0213 – Maintenance area, hydraulic repairing table depicted in IMGP020, 0209, and 0210 with oil staining and accumulated debris observed.

IMGP0214 – Maintenance area (center of the area looking north), with oil staining and deployed absorbent material was observed.
IMGP0215 – Maintenance area (center of the area looking east), with oils staining and tire tracks through oil stains were observed.
IMGP0216 – Maintenance area (center of the area looking south), curb sweeper with oil staining on the ground and oily tire tracks were observed.
IMGP0217 – Maintenance area (east-center looking north west), grapple maintenance stand with walled perimeter and fork-lift sleeves depicted in this photo.
IMGP0218 – Same area as IMGP0216 with a wider angle, oil staining observed.
IMGP0219 – Pond 1, western edge looking to the south east.
IMGP0220 – Wash water treatment system 'bio-digester' for equipment washing station.
IMGP0221 – This photo was taken from the southern boundary of the maintenance area looking east/south east towards the equipment washing station, cylinder storage bunker, and propane tank.
IMGP0222 – Chained cylinders in the cylinder storage bunker.
IMGP0223 – Cylinder storage bunker, flammables segregated from oxidizers.
IMGP0224 – Equipment washing station. Sweeper is being washed. Three black bulbs above the blue wall are a part of the bio-digester system.
IMGP0225 – Screened inlet to the wash water treatment system.
IMGP0226 – Stack of flattened cars to be shredded.
IMGP0227 – Eastern perimeter of facility (approximately center of fence line) looking north. In-sloped berm in the shadow of the fence with scattered debris was observed.
IMGP0228 – South east corner of pond 1 with drains and pumps (circular features).
IMGP0229 – Pond 1, south east corner looking to the north west corner and main office buildings.
IMGP0230 – Along the eastern boundary the facility near an electrical station, steel plates cover an inlet for the onsite storm collection system. Scattered debris and welding torch were observed.
IMGP0231 – Eastern boundary of the facility looking south, in-sloped berm with scattered debris was observed.
IMGP0232 – South east fire-access gate, break in the facility perimeter berm, scattered debris and ponded water were observed.
IMGP0233 – South east corner of the facility, in-sloped berm and scattered debris was observed.
IMGP0234 – Southern facility boundary, looking west, in-sloped berm and scattered debris was observed. Photo was taken from the east side of the non-ferrous storage stalls.
IMGP0235 – Southern facility boundary, looking west, in-sloped berm and scattered debris was observed. Photo was taken from the west side of the non-ferrous storage stalls.
IMGP0236 – Covered onsite storm water collection system inlet to the south east corner of the auto shredder residue (ASR) building.
IMGP0237 – ASR loading area (looking east).
IMGP0238 – ASR building.
IMGP0239 – South west of Building A, barrels of "Meta-Bond" on pallet.
IMGP0240 – Western boundary of the facility looking north. Ship loading conveyor extends over the water.
IMGP0241 – Western boundary of the facility looking west, gap in k-rail containment berm adjacent to water main. Gravels and other materials were observed on the water-side of the containment berm.
IMGP0242 – Ship loading conveyor, photo is taken from the south of the conveyor looking north west. The conveyor extends beyond the facility boundary, over water, to the dock. The chute in the center of the photo and the ground surround the support structure was observed to have accumulated sediments from the ship loading and conveyor maintenance activities. Maintenance personnel and equipment (bobcat or similarly-sized equipment) were observed on wharf (below the A-frame support structure).
IMGP0243 – Main access road that passes under the ship loading conveyor. Conveyor belt tension system was

observed on the left of the image – note the darkened areas of the k-rail berms adjacent to the tension system.
IMGP0244 – Base of the conveyor belt tension system on the water-side of the k-rail containment berm. This photo was taken from the north side of the system, looking south. Accumulated rust-colored sediment was observed at the base of the tension system. IMGP0270 and 0271 were taken from west side of the chain-link fence and demonstrate how this accumulated material discharges off site.
IMGP0245 – Conveyor belt tension system with accumulated debris/sediments on the aerial structures outside of the k-rail containment berms.
IMGP0246 – Rain bird dust suppression sprinkler above the ferrous shred pile and mouth of the ship loading conveyor.
IMGP0247 – Dust hog dust suppression sprinkler along the north western boundary of pond 2.
IMGP0248 – Western boundary of pond 2 with dust hog in the back ground and heavy equipment parked on sediments along the north west corner of pond 2.
IMGP0249 – Seepage from the western boundary of pond 2.
IMGP0250 – Ship loading conveyor, photo taken from the north, looking south west. K-rail containment berms ends and vehicle tracks from maintenance equipment to and/or from the wharf was observed.
IMGP0251 – Heavy equipment parked along the north west corner of pond 2, looking south east.
IMGP0252 – Photo was taken standing directly underneath the ship loading conveyor looking east back towards the facility. Sediments along the rail lines and a storm sewer inlet were observed in this area.
IMGP0253 – Photo was taken standing directly underneath the ship loading conveyor looking west towards the water (180 degrees from IMGP0252). Accumulated sediments were observed along the ground.
IMGP0254 – Photo was taken from same location as IMGP0252 and 0253 of boot-scrape to inspect observed sediments. Recent rail car activity compressed accumulated sediments along the rail line.
IMGP0255 – Ship loading conveyor footings (south side) with accumulated debris along the footings and shoreline. A catchment platform with plywood walls has been placed over the water to catch materials that are cast off from conveyor maintenance and cleaning activities. A flaoting boom was observed in the water. Debris was also observed on the submerged rocks.
IMGP0256 – Essentially the same as IMGP0255, though with greater focus on the water-line to demonstrate darkened sediments that were observed to come into contact with receiving waters by rising tides.
IMGP0257 – The land-side footing of the ship-loading conveyor (north side). The conveyor in the photo is used to facilitate cleaning the catchment platform. Accumulated debris was observed at this location.
IMGP0258 – This photo depicts the north side of the catchment platform, footings and small conveyor depicted in IMGP0257. Accumulated debris was observed on the water-side of the containment berm. Gaps in the plywood containment walls on the catchment platform were also observed with debris perched over receiving waters.
IMGP0259 – This photo depicts the shared dock directly underneath the ship loading conveyor (facing south). Equipment tracks were observed from activities depicted in IMGP0242.
IMGP0260 – Obsolete equipment was observed on the shared dock.
IMGP0261 – Accumulated debris and gaps in containment walls on the catchment platform were observed. (North west footing of ship loading conveyor depicted.)
IMGP0262 – Surface of the catchment platform with accumulated debris and gaps in the containment walls were observed. (Standing on the dock looking east towards the facility)
IMGP0263 – South side of the catchment platform, looking north east, accumulated debris on footings and I-beams, and gaps in containment walls of the catchment platform were observed.
IMGP0264 – Essentially the same as IMGP0263, though with greater focus on accumulated debris on the shore. Accumulated debris was also observed on the aerial portions of the ship loading conveyor structure.
IMGP0265 – Accumulated debris was observed on the west side of the catwalk structure to the south of the ship loading conveyor area.

IMGP0266 – Accumulated debris was observed on the east side of the catwalk structure to the south of the ship loading conveyor area, as well as on the electrical conduit and conduit box.
IMGP0267 – Accumulated debris was observed along the dock bumper. (Photo taken of the are underneath the ship loading conveyor looking north.)
IMGP0268 – Aerial portion of the ship loading conveyor, looking south.
IMGP0269 – Accumulated debris was observed on the north, land-side footings of the ship loading conveyor, looking south east.
IMGP0270 – Storm drain inlet and ship loading conveyor tensioner, photo taken from Herkner Rd/Dr.
IMGP0271 and 0272 – Close-up of storm drain inlet from IMGP0270 and accumulated sediments perched above the gutter.
IMGP0273 – Standing in the north west gate, looking north. New equipment for facility upgrades were staged in this location, berms were observed around this area, with the only gap in the berm in the center of this photo.
IMGP0274 and 0275– North west corner of the facility, berms, staged equipment and scattered debris were observed.
IMGP0276 – Staged equipment in the northwest corner of the facility, looking south east.
IMGP0277 – Covered fueling and oiling depot. Oil staining was observed on the driving surface.
IMGP0278 – Storage yard to the west of the fueling and oiling depot.
IMGP0279 thru 0281 – Staged equipment in the storage yard to the west of the fueling and oiling depot. Some staged equipment was observed over-hanging the berms and had potential to discharge storm water to areas where runoff could occur.
IMGP0282 – Oil staining was observed on the exterior wall and earthen ground on the north side of the fueling and oiling depot. IMGP0285 and 0286 demonstrate that this area is exterior to the air compressor.
IMGP0283 and 0284 – Bulk oil ASTs, spill kit, and air compressor were observed under cover. Oil staining was observed around the grey oil tank.
IMGP0285 and 0286 – Area behind the air compressor where oil staining was observed as mentioned regarding IMGP0282.
IMGP0287 – Stock pile of absorbent material, drums and waste oil containers observed in the covered fueling and oiling depot.
IMGP0288 thru 0293 – Oil lines, drums, and oil leaks observed within the covered fueling and oiling depot. The spigot in IMGP0293 is a drain line for the secondary containment basin for the diesel tank depicted in
IMGP0294 thru 0298 – Diesel AST and secondary containment basin. Diesel dispensing nozzle is stored over a bucket to catch incidental drips.
IMGP0299 – Oil drums stored within the covered fueling and oiling depot. Oil staining was observed on the floor of this area.
IMGP0300 – Northern boundary of pond 2, looking south.
IMGP0301 – Dump truck depositing transferred metal from another Sims facility. Vehicle tracks were observed on the driving surface.
IMGP0302 – Appliance processing yard with observed vehicle tracks across the driving surface (both wet and dry).



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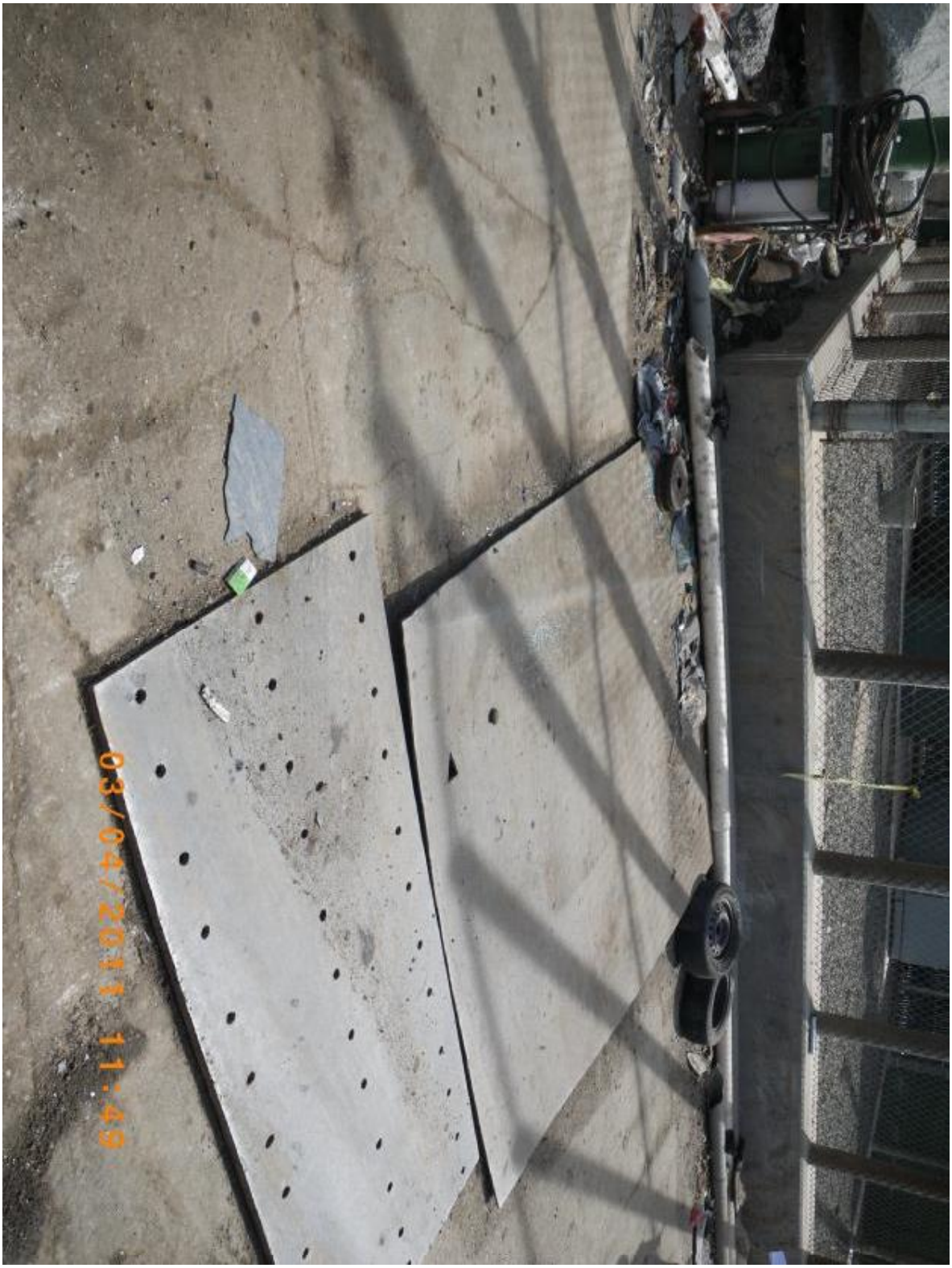

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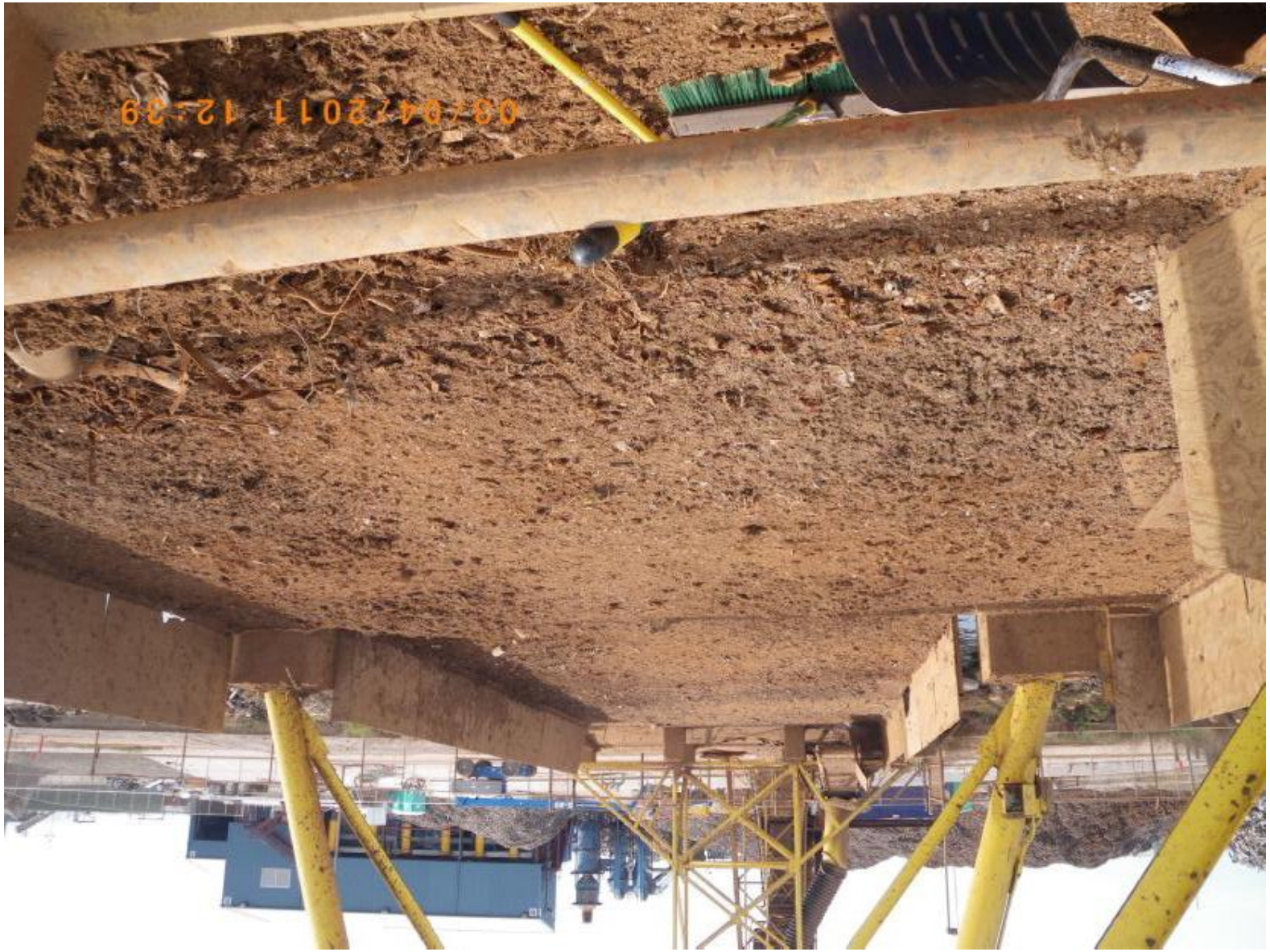

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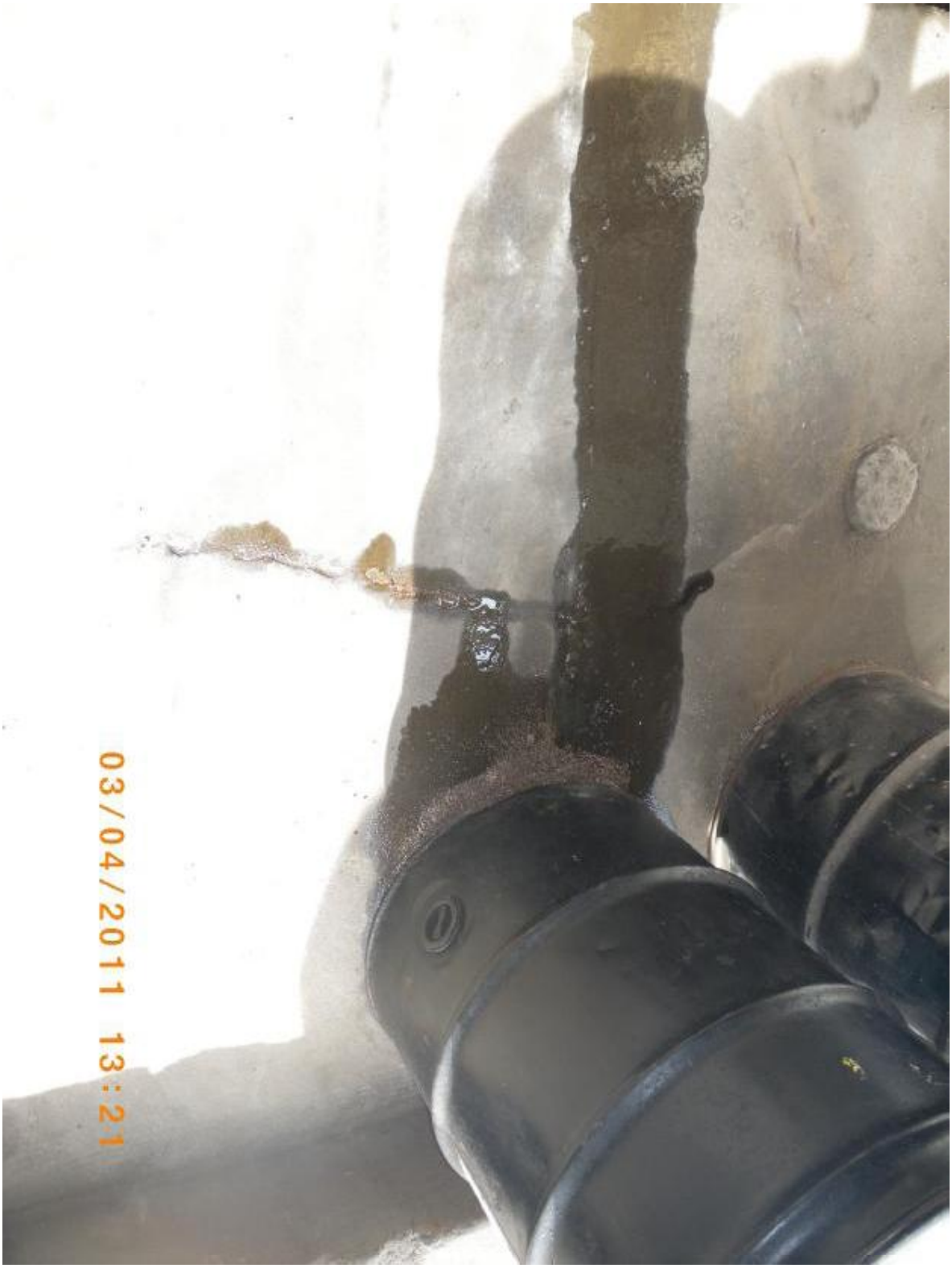

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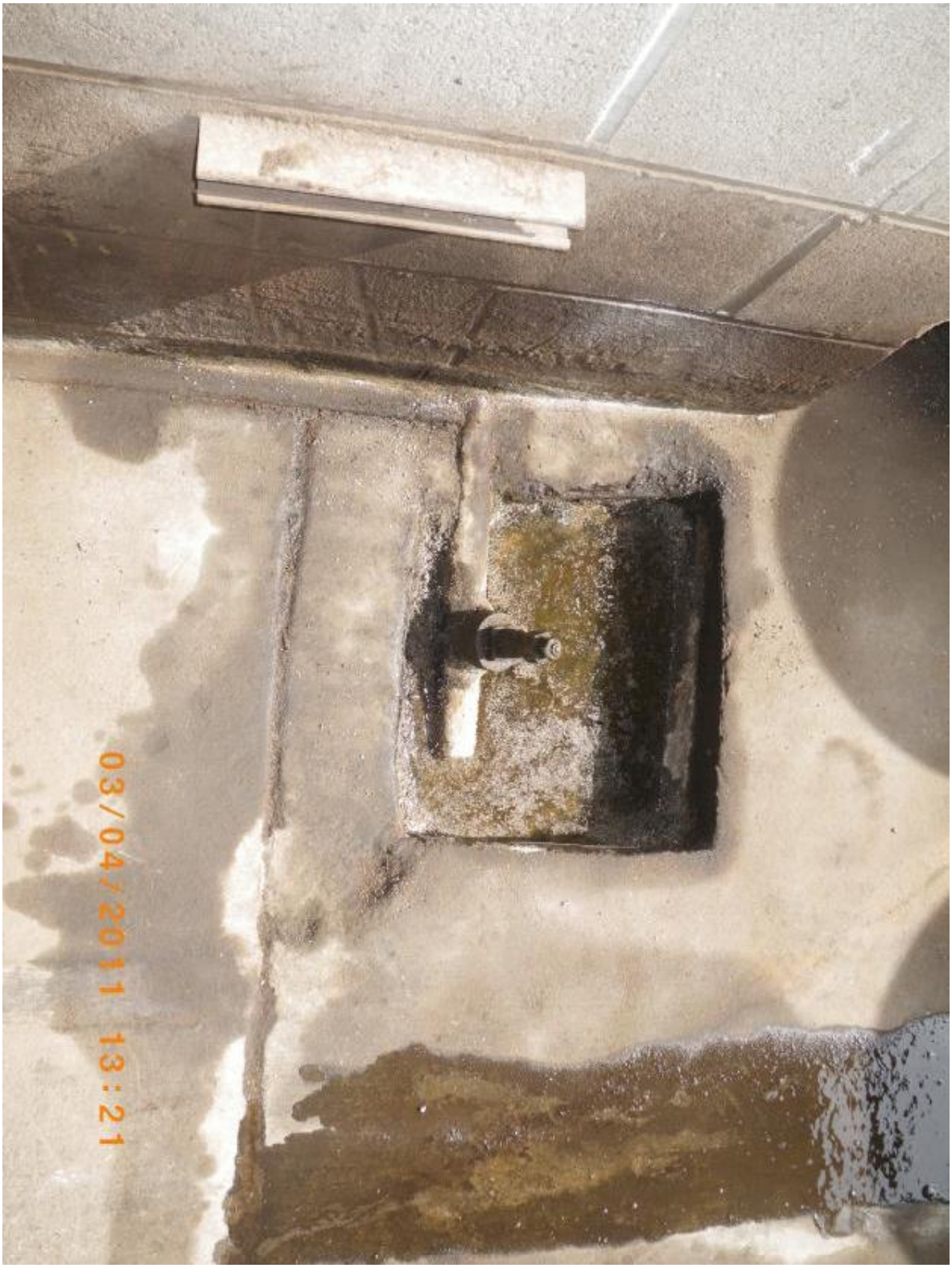

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