

Johnson, Sabrina O

From: Wargo, Emily
Sent: Monday, October 21, 2019 1:15 PM
To: SWD_Waste
Cc: Kirchein, Adam; Tafuni, Steven
Subject: FW: American Steel Processing Monthly Report
Attachments: 0-monthly201910-consolidated.pdf

See attached for the most recent monthly report from American Steel (WACS ID: 106062).



Emily Wargo

Florida Department of Environmental Protection
Southwest District
Engineering Specialist II
Emily.Wargo@FloridaDEP.gov
Office: 813-470-5942

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Please consider the environment before printing this email.

From: Robert Middleton <robertdemet@aol.com>
Sent: Monday, October 21, 2019 10:13 AM
To: Wargo, Emily <Emily.Wargo@FloridaDEP.gov>
Cc: Morgan, Steve <Steve.Morgan@FloridaDEP.gov>; Dilmore, Cory <Cory.Dilmore@FloridaDEP.gov>; aspc01@comcast.net; housh@northsideengineering.net
Subject: American Steel Processing Monthly Report

Emily,

Attached is American Steel Processing monthly report for the Orient Road Recycling Center. As we discussed we would appreciate confirmation for follow-up telecon meeting this Friday, October 25th, 9:00 a.m., to review points from this monthly report and specifically in respect updated proposal for leachate control plan.

Thanks!

Robert

Robert Middleton
American Steel Processing Company
Office: 631-499-1299
Fax: 904-485-8752
Cell: 516-384-7404
Email: robertdemet@aol.com

-----Original Message-----

From: Wargo, Emily <Emily.Wargo@FloridaDEP.gov>
To: Robert Middleton <robertdemet@aol.com>

Sent: Fri, Oct 18, 2019 3:13 pm
Subject: Teleconference to Discuss Updated Site Plan for American Steel

Good afternoon Robert,

Next week the Department would be available for a teleconference on Thursday, October 24, 2019 from 12:00 – 1:00pm, or on Friday, October 25, 2019 from 9:00 – 10:00am. Please let me know which date and time works best for you.

Can you please provide a list of participants who will be calling in for American Steel?

Please let me know if you have any questions.

Thank you,



Emily Wargo
Florida Department of Environmental
Protection
Southwest District
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*P.O. Box 9220, Panama City, FL 32417
Office: 850-235-1727, Fax: 850-235-0517*

October 21, 2019

via electronic mail
Steve Morgan
Florida Department of Environmental Protection
Southwest District Office
13051 North Telecom Parkway #101
Temple Terrace, FL 33637-0926

Re.: American Steel Processing Recycling Center
Temporary Approval of Advanced Metal Recovery
Hillsborough County, FL
WACS No.: 106062

Dear Mr. Morgan:

In accordance with the reference Temporary Approval WACS No. 106062 (the "Order"), this letter represents the second monthly report by American Steel Processing Company ("AmSteel") as required under Conditions of Administration of Order, section 9. Per the Order the following is a status summary of items completed and in progress:

1. Health and Safety plans for the site are updated. Annual employee training is performed and each employee is required to sign-off attendance to the training. A copy of the "Job Site Work Rules" and a copy of the last employee training log has been provided to FL-DEP.
2. Fugitive dust emissions from the storage, processing, or transport of ash residue are controlled by wetting or covering with a tarp. A 500 gallon water truck is maintained at the site and used as required to provide a spray mist over the processing area during periods of low humidity where dust control is needed. In respect to ash liberated from the inbound ferrous materials, such liberated ash is transported from the site on a daily basis. Any liberated ash from processing which is held over and staged at the site is placed temporarily in respective ash bunkers and is covered by tarp at the end of each day.
3. Immediately on approval of the Order, AmSteel has implemented berms (hydra-barriers) on the site perimeter to prevent any water runoff from the site to adjacent lands. The hydra-barriers have been implemented to augment the existing concrete curbs on the site perimeter. Since implementation of the perimeter barriers and with the topography of the site, this system has been successful in preventing site precipitation run-off to adjacent properties. Ash residue from processing of the inbound ferrous is covered by tarp at the end of



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each day or during periods of precipitation to mitigate leachate formation from these materials. Further, AmSteel's processing of inbound ferrous materials is typically on the day of delivery and not more than 3 days from delivery to limit to the best intent possible stocks of inbound materials held on the site.

4. Following from the meeting with FL-DEP on September 26, 2019, and in consideration of the comments from FL-DEP as to the leachate control requirements, AmSteel with its engineering consultant (Northside Engineering) has re-evaluated the site requirements for leachate management. With this a new site plan development is being proposed (see attached drawing C4.1 Grading, Drainage, and Utility Site Plan). With this development the site area will be physically separated with berm between the processing area and the non-processing area at the site. The result of adding the separation berm is a reduction in the area for capture of precipitation requiring management by approximately 50 percent. Further under this new site plan development an additional capture drain and sediment basin will be installed at the low point inside the processing area to capture precipitation water from the processing area separately from the non-processing area. With this proposed site plan development, waters captured in the processing area will not be mixed with waters captured in the non-processing area. The sizing for water capture in the processing area is based on precipitation event of 100 year storm at 4.5 inch per hour. (AmSteel to follow up with discussion of this proposal with FL-DEP).
5. As per the above Item 4, leachate from the processing area shall be captured and shall not be discharged to any stormwater system. Further to the aforementioned proposal, captured leachate at the sediment basin shall be pumped into aboveground holding tanks. Three each 3,000 gallon tanks will be installed. Additionally a 3,000 gallon water truck shall be implemented at the site for pumping out the sediment basins hauling the water offsite as required. Additional hauling trucks shall be augmented as required. (See attached sediment basin pumping station detail.)
6. Inbound ferrous for processing consists of magnetically recovered ferrous scrap materials recovered from five waste-to-energy facilities. No other materials are managed at the Orient Road Recycling Center. Due to physical constraints of the site and the processing systems and equipment, it is not possible to cover the inbound ferrous scrap. However, the following procedures are implemented to mitigate the exposure of the materials:
 - a. Inbound ferrous scrap receipts shall be temporarily halted during periods of inclement weather, such as rain and/or wind.
 - b. Inbound ferrous scrap shall be processed within 3 days of receipt to avoid long term staging of the materials at the site.



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- c. Residues from processing of the ferrous scrap shall be hauled on a daily basis from the Recycling Center and returned to their origin WTE facility. In the event of holding over any portions of the residues from processing, such residues shall be temporarily staged in respective bunkers by originating WTE facility and tarped daily.
 - d. All inbound and outbound hauling vehicles shall be tarped.
 - e. The aforementioned leachate control plan (Item 4 and 5 above) shall be implemented at the site eliminating the discharge of precipitation from the processing areas to a stormwater outfall.
7. Following the processing of the inbound ferrous scrap, the remaining ash residue will be returned to the originating WTE facility for proper management in accordance with their conditions of certification. (also see Item 6c above)
8. AmSteel has completed evaluation of background soil samples adjacent to the operating site area in compliance with the Order. Such soil samples have been collected and analyzed. The summary of the results of the soils analysis has been previously submitted to FL-DEP. Following from feedback with FL-DEP, AmSteel has proceeded with additional material sampling and analysis which is currently underway. The additional analysis results are forthcoming and upon receipt AmSteel shall make comparison evaluations of the site sample results versus the background sample results. AmSteel shall report the results of these evaluations to FL-DEP.
9. Since the last meeting with FL-DEP AmSteel continues to prosecute the operations under the provisions of the Order. Along with this monthly report, attached is a copy of the last monthly routine inspection report for September 2019 for the operations.
10. FL-DEP Department staff with proper identification shall have permission to enter, inspect, sample and test as needed to verify compliance with the requirements of Chapter 403, F.S., and the Order, during normal business hours.
11. By this letter, AmSteel request a further 90 day extension of the Temporary Approval (Order WACS No.: 106062) from its current expiration date. AmSteel proposes this addition period to allow for the parties to consider the proposal of Items 4 and 5 above relating to the site modifications for leachate management.

Please feel free to contact me at 516-384-7404 if you have any questions.



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Sincerely,

A handwritten signature in black ink, appearing to read 'R D Middleton', with a horizontal line underneath.

R. D. Middleton
V. P. - American Steel Processing Co.

cc: T. Fanell – CEO American Steel Processing Co.
H. Ghovae – Northside Engineering, Inc.
C. Dilmore – FL-DEP

American Steel Processing Company

Orient Road Recycling Center

Leachate Management

LEDGEND:

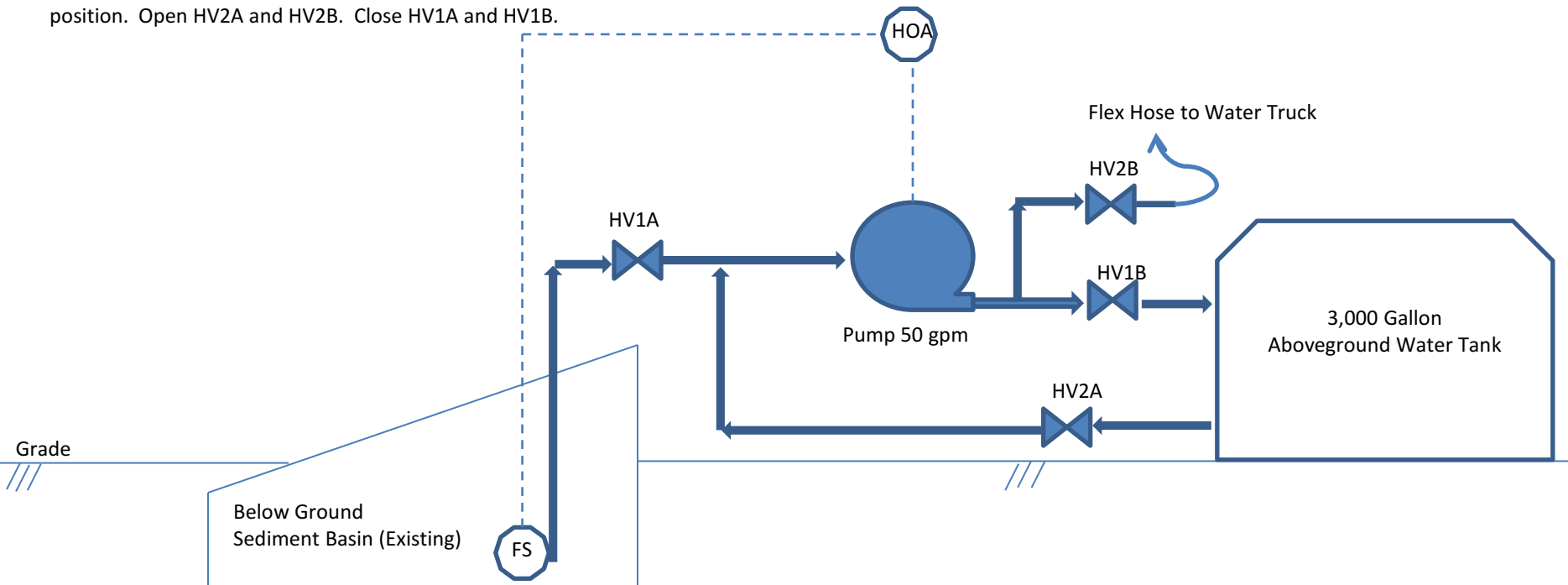
HOA: Hand-Auto Switch

HV: Hand Valve

FS: Float Switch

OPERATION:

1. Normal operation on FS. Place HOA in "Auto" position
Open HV1A and HV1B. Close HV2A and HV2B.
2. To Empty Tank to Water Truck. Place HOA in "Hand"
position. Open HV2A and HV2B. Close HV1A and HV1B.



MSGP Quarterly Visual Assessment Form

(Complete a separate form for each outfall you assess)

Name of Facility: American Steel Processing Company		Permit No.: FLR05H923-001	
Street Address: 6990 East 6th Ave		City: Tampa	State: FL Zip Code: 336193
Outfall Number: 3 or 8	"Substantially Identical Outfall"? No <input checked="" type="checkbox"/> Yes (identify substantially identical outfalls):		
Quarter/Year: Q1 Q2 Q3 Q4	Substitute Sample?: <input checked="" type="checkbox"/> No Yes (identify quarter/year when sample was originally scheduled to be collected):		
Person(s)/Title(s) collecting sample: Stephen Rochris Superintendent			
Person(s)/Title(s) examining sample: Stephen Rochris Superintendent			
Date & Time Storm or Snowmelt Began: N/A	Date & Time Sample Collected: 9-30-19 9AM	Date & Time Sample Examined: 9-30-19 9:30AM	
Nature of Discharge: (Rainfall) Snowmelt			
Rainfall Amount: 0 inches	Previous Storm Ended > 72 hours Before Start of This Storm? Yes N/A No* (explain):		
Parameter			
Color	None Other (describe):		
Odor	x None Musty Sewage Sulfur Sour Petroleum/Gas Solvents Other (describe):		
Clarity	Clear x Slightly Cloudy Cloudy Opaque Other (describe):		
Floating Solids	No x Yes (describe): Debris		
Settled Solids**	No Yes (describe): Not observed		
Suspended Solids	No Yes (describe): Not observed		
Oil Sheen	x None Flecks Globs Sheen Slick Other (describe):		
Foam (gently shake sample)	x No Yes (describe):		
Other Obvious Indicators of Storm Water Pollution	x No Yes (describe):		

* The 72-hour interval can be waived when the previous storm did not yield a measurable discharge or if you are able to document (attach applicable documentation) that less than a 72-hour interval is representative of local storm events during the sampling period.

** Observe for settled solids after allowing the sample to sit for approximately one-half hour.

Sampling not performed due to adverse conditions: ☒ No Yes (explain):

Sampling not performed due to no measurable storm event occurring that resulted in a discharge during the monitoring quarter: ☒ No Yes (explain):

Detail any concerns, additional comments, descriptions of pictures taken, and any corrective actions taken below (attach additional sheets as necessary).

Certification by Facility Responsible Official (Refer to MSGP Subpart 11 Appendix B for Signatory Requirements)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

A. Name _____

B. Title _____

C. Signature _____

D. Date Signed _____

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Person(s)/Title(s) collecting sample:			
Person(s)/Title(s) examining sample:			
Date & Time Storm or Snowmelt Began: N/A	Date & Time Sample Collected: _____		Date & Time Sample Examined: _____
Nature of Discharge: Rainfall <input checked="" type="checkbox"/> Snowmelt			
Rainfall Amount: 0 inches	Previous Storm Ended > 72 hours Before Start of This Storm? Yes <input checked="" type="checkbox"/> No* (explain):		
Parameter			
Color	None Other (describe):		
Odor	<input checked="" type="checkbox"/> None Musty Sewage Sulfur Sour Petroleum/Gas Solvents Other (describe):		
Clarity	Clear <input checked="" type="checkbox"/> Slightly Cloudy Cloudy Opaque Other (describe):		
Floating Solids	No <input checked="" type="checkbox"/> Yes (describe): Debris		
Settled Solids**	No Yes (describe): Not observed		
Suspended Solids	No Yes (describe): Not observed		
Oil Sheen	<input checked="" type="checkbox"/> None Flecks Globs Sheen Slick Other (describe):		
Foam (gently shake sample)	<input checked="" type="checkbox"/> No Yes (describe):		
Other Obvious Indicators of Storm Water Pollution	<input checked="" type="checkbox"/> No Yes (describe):		

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A. Name _____

B. Title _____

C. Signature _____

D. Date Signed _____

Routine Site Inspection
(perform monthly)

Date: 5-27-2019
By: J. R. J.

Area/Action	Yes or No	What Did You See?	Applicable BMPs Being Followed	What Did You Do About It?
Material delivery, processing and holding areas:				
Processing and handling in paved areas:	Y	Material processed in paved area	Material piles in designed areas	no action
Storm water contained on site by curbing & grading	Y	Paving damage Yes or No	Repair work planned as needed.	Confirmed reqd repairs with site manager
Storm water drains inspected and filters replaced	Y	Drain filters in place	Management of runoff	Filter requires replacement Yes or No
3rd Party Equipment Inspections:		SURFACE STORM WATER SYSTEM		
3rd party vehicles inspected on entering site & drivers advised of deficiencies	Y	Trucks directed to dump areas	Spill prevention	observation
On-site equipment inspections:				
Inspect for fluid leaks, operational readiness, normal maint				
- Loaders	Y	Equip in working condition	Preventive maintenance	condition observed
- Screeners:	Y			
- Cranes	Y			
- Skidsters:	Y			
- Fuel tanks:	Y			
- Mobile units:	Y			
Inspect surface storm water system:				
Drains and filters:	Y	Visual inspection	Management of runoff	drain filters in place
Structural water controls (curbing):	Y			structural repairs scheduled
Sediment basins:	Y			basins cleaning required
Asphalt & paving areas:	Y			asphalt maint'd in work areas
- Other:				
Housekeeping:				
Equipment areas:	Y	Visual inspection	Good housekeeping	Areas maintained clean
Site perimeters:	Y			
Office and scale areas:	Y			
Fuel areas:	Y			
Storage bldgs and maintenance areas:	Y			

Notes:

Site curbing and water barriers in place and maintained.

Ash bunkers covered daily and covers inspected, maintained, and replaced as needed.