



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
INDUSTRIAL STORMWATER
EXPEDITED SETTLEMENT AGREEMENT



Permittee		Site Factors		
Site Name:	Action Environmental Systems, LLC	Acres of Exposure:	7.4	
Street Address:	920 E 132nd Street	Full Time Employees:	750	
City, State, Zip:	Bronx, NY 10454	Environmental Harm:	Med	
Lat/Long:	40.797798, -73.91214	Sector:	N - Scrap Recycling Facilities	
Permit ID:	NYR00D502	Receiving Water(s):	East River	
Inspection Date:	2/28/2025	Water(s) Status:	High Quality	
Permit Section Citation		Magnitude*	Penalty Amount	Duration
2.1.1	Control Measure Selection and Design Considerations			
2.1.2	Non-Numeric Technology-Based Effluent Limits	Significant	\$10,547	300 days
3.1	Routine Facility Inspections			
3.2	Quarterly Visual Assessment of Stormwater Discharges			
4.1	Monitoring Procedures			
4.2.2	Benchmark Monitoring			
4.2.3	Effluent Limitations Monitoring			
4.2.5	Impaired Waters Monitoring			
5.1	Corrective Actions			
5.2	Additional Implementation Measures (AIM)			
6	Stormwater Pollution Prevention Plan (SWPPP)			
7	Reporting and Recordkeeping			
		Total:	\$10,547	

* "Magnitude" reflects the severity and/or duration of the violations identified by the Inspector(s) at the time of the Inspection.



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Permit Section Citation	Description of Violations
2.1.1 Control Measure Selection and Design Considerations	
2.1.2 Non-Numeric Technology-Based Effluent Limits	Part II.A.2.a of the MSGP, in the Good Housekeeping section of the MSGP, requires the Facility to sweep or vacuum at regular intervals. At the time of the inspection, on February 28, 2025, the Facility's sweeper was down, and was said to have been down for a period of time. Evidence of mud, debris and sediment accumulation were observed in several areas of the Facility. Facility representatives stated that the site is typically swept every day, logs of these sweepings were kept at the Scale House. According to Site sweeper logs shared with EPA, the Sweeper did not sweep the Facility for 300 days out of the 776 days between September 6, 2023 to October 21, 2025. Per review of the EPA ECHO database, https://echo.epa.gov/detailed-facility-report?fid=110017352274, the Upper East River is impaired for Dissolved Oxygen. Appendix F of the MSGP lists Sector N, Salvage Facilities, like Action, as discharging a pollutant of concern, Chemical Oxygen Demand, as a pollutant that causes/contributes to Low Dissolved Oxygen. Because the Upper East River is impaired for Low D.O., the waterbody, is listed as a high quality per the Supplemental Guidance to the 1995 Interim Clean Water Act (Settlement Penalty Policy for Violations of the, Industrial Stormwater Requirements September 8, 2016) which states that, "[i]n addition, where a receiving water does not meet the criteria above for a high quality water, but is a 303(d) listed water or subject to a TMDL for the pollutant of concern, then the receiving water should be treated as a high quality water for the purposes of determining the B Factor." Action Environmental Systems/Interstate Waste Services is a large company with several locations with 750 employees per a January 21, 2026 OneStop Report on the Facility by Dunn & Bradstreet Hoovers.
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