

UNPERMITTED INDUSTRIAL FACILITY STORMWATER INSPECTION CHECKLIST

Inspection Date	December 6, 2023	
Time	Entry: 12:22 PM	Exit: 1:10 PM
Weather Conditions	70's and sunny	
Media/Program	Water – CWA § 301, 402 – Industrial SW/NEC	
Operator Name:	One More Time, Inc., owned by Baker Commodities, Inc.	
Facility or Site Name:	One More Time, Inc.	
Permit ID or Tracking #:	Unpermitted	
SIC Code:	* 4953 - Refuse Systems	
Facility Address:	4144 Bandini Blvd	
(city, state, zip code)	Vernon, CA 90058	
Geographic Coordinates:	34.003234, -118.190197	
Mailing address:	4144 Bandini Blvd	
(city, state, zip code)	Vernon, CA 90058	
County:	Los Angeles	
Regular Days/Hours of Operation:	8:00 AM – 5:00 PM (M – F)	
# of Employees at location:	5	
Size of Facility (in acres):	Approximately 0.4 acres	
Receiving Water(s):	Los Angeles County municipal separate storm sewer system (MS4)	
Date facility est. @ location:	15-20 years	
Onsite Representatives:		
Name: Eli Cohen	Title: General Manager	Phone: (909) 687-9890
	Email: ecohen@onemoretimeinc.com	
Name: Frank Tavakoli	Title: Environmental Compliance Specialist	Phone: (323) 268-2801, ext. 3267
	Email: KTavakoli@BakerCommodities.com	
Authorized Official:	→ Contacted? ☒ Yes ☐ No	
Name: Eli Cohen	Title: General Manager	Phone: (909) 687-9890
	Email: ecohen@onemoretimeinc.com	
Name: Frank Tavakoli	Title: Environmental Compliance Specialist	Phone: (323) 268-2801, ext. 3267
	Email: KTavakoli@BakerCommodities.com	
Additional Personnel Participating in Inspection: N/A		
Inspector(s):	Title:	Company:
Taylor Fontaine	Lead Inspector	PG Environmental
Ash Nieman	Inspector	EPA – Region 9
Rachel Olugbemi	Inspector	EPA Headquarters
Inspection Report Author:		
Name: Taylor Fontaine	Signature: <i>Taylor Fontaine</i>	Date: January 18, 2024

SECTION I – INTRODUCTION

Purpose of the Inspection

The purpose of the inspection was to determine compliance with the industrial stormwater requirements under §§ 301 and 402(p) of the CWA and its implementing regulations found at 40 CFR Part 122.26. The inspection was unannounced and consisted of interviewing facility representatives, recording field observations, and taking photographs to document site conditions throughout the facility at the time of the inspection.

Opening Conference

- 1) Brief narrative documenting those present, introductions, presentation of credentials, and explanation of the purpose of the inspection.

On December 6, 2023, U.S. Environmental Protection Agency (EPA) contractor, PG Environmental, conducted an industrial stormwater non-filer inspection at One More Time, Inc. located in Vernon, California (Facility). Rachel Olugbemi of EPA Headquarters, Ash Nieman of EPA Region 9, and Taylor Fontaine of PG Environmental, (collectively the EPA Inspection Team) met with the Facility representative, Frank Tavakoli. The EPA Inspection Team presented their credentials and explained that it was EPA's understanding that the Facility did not have an industrial stormwater permit. The EPA Inspection Team explained they were onsite to conduct a Clean Water Act stormwater inspection which includes observing the current operations of the facility and assessing the potential for stormwater discharges from the facility. During the opening conference, the EPA Inspection Team also held a conference call with Eli Cohen, General Manager of One More Time, Inc. and explained the purpose of the inspection.

According to precipitation data from the National Oceanic and Atmospheric Administration (NOAA)¹, the Vernon, California area received no rain the day prior to the inspection. There was also no rain during the inspection.

- 2) Credentials presented to: Frank Tavakoli – Environmental Compliance Specialist
- 3) Facility acknowledged receiving previous outreach materials or correspondence on Permit requirements?
☐ Yes ☒ No Describe:

The Facility representative stated that he was unaware of any previous outreach regarding the requirement to apply for and obtain a permit.

- 4) Facility has been individually notified by permit authority or EPA that it is subject to stormwater requirements? ☐ Yes ☒ No Describe:

The Facility representative stated that he was unaware of any notification by EPA or the State of California regarding stormwater Permit requirements.

¹Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

FACILITY'S OPERATION & PRODUCT DESCRIPTION

***Description of business and industrial activities occurring throughout the site. (Include operator's description and note any documentation that further establishes SIC code (permit applications, reports, business registries, website...)).**

The Facility collects used cooking oil from local restaurants, temporarily stores the oil in plastic and metal tanks at the Facility, before trucking the oil to Baker Commodities, Inc. the same day it was collected. The Facility representatives stated that the used cooking oils are not stored onsite overnight, but that the Facility does store trucking and machinery overnight. The Facility representative stated that the Facility does not perform any other operations except for the temporary storage of the used cooking oil.

Other industrial facilities owned/operated by same business entity? ☒ Yes ☐ No **Describe:**

The Facility is owned by Baker Commodities, Inc., a national organization with locations across United States including at least 6 facilities in California according to the Baker website, <https://bakercommodities.com/our-locations/>.

SECTION II – OBSERVATIONS

SITE EVALUATION

Pollutant Sources	Note location, quantity/size, design issues, any O&M deficiencies (including the nature and extent), potential pollutants, and evidence of exposure to stormwater. Are BMPs in place to minimize or eliminate stormwater discharges from industrial activities?
Loading/Unloading Operations	The Facility serves as a temporary holding location for the collected grease traps/tanks. According to Facility representatives, when enough are collected, they are trucked to the nearby Baker Commodities, Inc. facility for disposal.
Industrial Manufacturing/Processing Operations	The Facility does not conduct any manufacturing or processing operations onsite.
Industrial Machinery & Equipment Storage	The EPA Inspection Team did not observe any industrial machinery and equipment storage other than the cooking oil grease traps/tanks.
Storage of Industrial Materials or Products	The Facility stores plastic and metal tanks containing used cooking oil. The EPA Inspection Team observed empty grease traps at the Facility (refer to <u>Appendix B, Photographs 2 and 3</u>). See the Section titled, "Liquid Storage (e.g., Tanks, Liquid Storage Drums)" for additional information.
Liquid Storage (e.g., Tanks, Liquid Storage Drums)	The Facility was storing used cooking oil in two (2) estimated 100-gallon metal tanks and 50-60 plastic tanks of varying sizes (refer to <u>Appendix B, Photographs 2, 3, 4, 6, and 7</u>). The plastic tanks contained residual oils, were uncovered, and were exposed to stormwater.

Pollutant Sources	Note location, quantity/size, design issues, any O&M deficiencies (including the nature and extent), potential pollutants, and evidence of exposure to stormwater. Are BMPs in place to minimize or eliminate stormwater discharges from industrial activities?
Waste Storage/Disposal Areas (solid and/or hazardous)	The Facility specializes in temporary storage of used cooking oil products; however, there was no set location for storage of used cooking oils at the Facility. The EPA Inspection Team observed several storage locations throughout the Facility (refer to Appendix B, Photographs 1, 2, 3, 4, 6, and 7).
Waste Treatment Facilities (e.g., Pretreatment Systems)	Not observed or reported at the Facility.
Fueling Stations/Equipment Maintenance Areas & Cleaning Areas	The Facility representative stated there is no vehicle or equipment fueling onsite nor does the Facility clean the grease traps. The Facility conducts minor machinery maintenance inside a building onsite (refer to Appendix B, Photograph 12). The Facility representative stated there are no floor drains in the building.
Sediment & Erosion Controls	The EPA Inspection Team did not observe any erosion and sediment controls.
Spills/Leaks Handling	The EPA Inspection team observed several locations throughout the Facility where used cooking oil had been spilled on the ground and staining was observed on the ground surface. Spill kits were not observed at the Facility (refer to Appendix B, Photographs 2, 4, 6, 7, and 8).
Outside Shelters	☐ Temporary (Date Established) ☐ Permanent The EPA Inspection Team did not observe any outside shelters.
Evidence of non-stormwater sources/discharges (allowable if permitted under MSGP)?	The EPA Inspection Team did not observe evidence of non-stormwater sources/discharges that would have been allowable if permitted under California's Industrial General Permit.
Evidence of process wastewater sources/discharges?	The EPA Inspection Team did not observe any evidence of process wastewater sources/discharges onsite.
OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS	
Number and description of each potential Stormwater Discharge Point from the Facility	The EPA Inspection Team observed one potential stormwater discharge point at the entrance/exit onto Bandini Boulevard (refer to Appendix B, Photographs 12 and 13).

Evidence of pollutants migrating offsite (stains, deposits, ponding) at discharge points, into Receiving Waters or in MS4	Staining and spilled used cooking oil was observed on the ground surface throughout the Facility (refer to <u>Appendix B, Photographs 2, 4, 6, 7, and 8</u>).
Evidence of Non-stormwater Discharges leaving site (authorized or unauthorized)	The EPA Inspection Team did not observe evidence of non-stormwater discharges leaving the site.
Description of general gradients/slopes onsite, all apparent discharge points, and discharge pathway from Facility to Receiving Water or MS4 (storm drains, channel, swale, ditches, driveway, pipes, & etc.)	The northern portion of the property is graded northwest and stormwater would be conveyed north towards the Facility entrance/exit (refer to <u>Appendix B, Photographs 12 and 13</u>). This area is primarily used for customer and employee parking. The southern portion of the Facility is graded towards the south and stormwater would pool along the southern and western boundaries (refer to <u>Appendix B, Photograph 5</u>). The EPA Inspection Team observed one potential stormwater discharge point at the entrance/exit onto Bandini Boulevard (refer to <u>Appendix B, Photographs 12 and 13</u>).

SECTION III – AREAS OF CONCERN

- 1) The EPA Inspection Team observed several locations throughout the Facility where used cooking oil had been spilled and staining was observed on the ground surface (refer to Appendix B, Photographs 2, 4, 6, 7, and 8). Spill kits were not observed at the Facility.
- 2) The EPA Inspection Team observed one 35-gallon drum and four 5-gallon buckets containing used cooking oil stored outside without cover and exposed to stormwater (refer to Appendix B, Photograph 1).
- 3) The Facility stored used cooking oil in two (2) estimated 100-gallon metals tanks and 50-60 plastic tanks and grease traps of varying volumes (refer to Appendix B, Photograph 2, 3, 4, 6, and 7). These tanks and grease traps contained residual oils, were uncovered, and were exposed to stormwater.

SECTION V – LIST OF APPENDICES

Appendix A – Aerial showing location & discharge pathway

Appendix B – Photograph Log

Appendix A
Aerial Location



Figure 1. Google Earth view of the Facility (dated 2023). The red arrows depict the observed entrance and areas of note, the blue lines depict potential stormwater flow direction, and the red lines show the approximate observed Facility boundary.

Appendix B
Photograph Log



Photograph 1. View of a 35-gallon drum and four 5-gallon buckets containing used cooking oil stored outside without secondary containment or cover.



Photograph 2. View, facing south, of used grease traps stored without cover or secondary containment. The containers contained residual amounts of used cooking oil and grease. Note the spilled oil on the ground surface.



Photograph 3. View of used cooking oil and grease inside one of the containers shown in Photograph 2.



Photograph 4. View of spilled used cooking oil on the ground adjacent to a 100-gallon used cooking oil tank by the Facility's western boundary.



Photograph 5. View, facing south, of the Facility's southern boundary. The perimeter of the Facility, aside from the entrance/exit, was enclosed by a concrete wall or concrete berm.



Photograph 6. View, facing north, of the Facility's western boundary. Note the spilled used cooking oil on the ground surface adjacent to the 100-gallon used oil tank.



Photograph 7. View, facing east, of open used cooking oil containers stored in the eastern portion of the Facility. The containers held residual amounts of used cooking oil. Note the cooking oil stains on the ground surface.



Photograph 8. View of used cooking oil stains on the ground surface in front of an empty used cooking oil container in the eastern portion of the Facility.



Photograph 9. View of used cooking oil container lids stored outside without cover and exposed to stormwater.



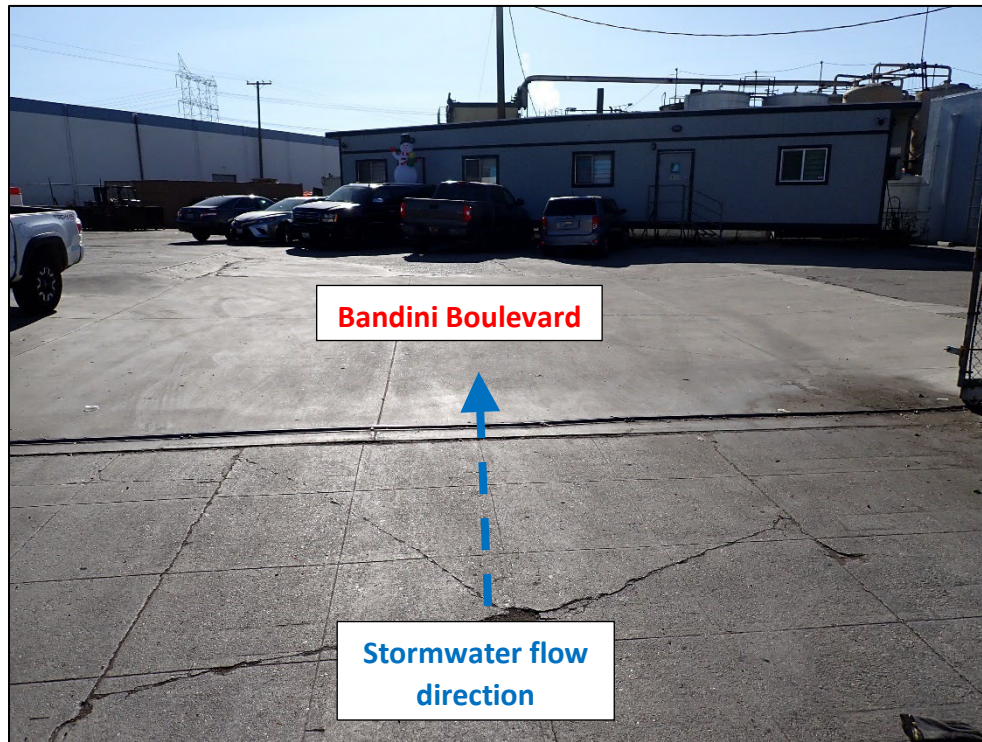
Photograph 10. View, facing north, of a 5-gallon bucket containing used cooking oil stored without cover and exposed to stormwater. Note the staining on the ground around the bucket.



Photograph 11. View, facing north, of the Facility's northeastern boundary.



Photograph 12. View, facing west, of the center of the Facility. This area had a shallow trench that conveyed stormwater towards the entrance/exit of the Facility.



Photograph 13. View, facing south, of the Facility entrance/exit from Bandini Boulevard.



Photograph 14. View, facing east, of a curb inlet located directly to the east of the Facility's entrance/exit. The curb inlet connects to the Los Angeles County MS4.