

REPORT OF INDUSTRIAL STORM WATER COMPLIANCE EVALUATION INSPECTION (CEI)

At

Heavy Duty Rebuilder's Supply, Inc.
1250 W Liberty Ave, Ozark, MO 65721
Ozark, Missouri 65721
State Permit No.: MO0135313

On
November 28, 2023

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

INTRODUCTION

An Industrial Storm Water inspection was performed at Heavy Duty Rebuilder's Supply, Inc. in Ozark, Missouri on November 28, 2023. This inspection was performed pursuant to Section 308(a) of the Clean Water Act as amended. This narrative report and attachments present the findings and observations made during the Industrial Storm Water CEI.

PARTICIPANTS

Heavy Duty Rebuilder's Supply, Inc.:
Derek Day, President, 417-581-9800, derek@heavydutyinc.com

Missouri Department of Natural Resources:
Andrea Kendrick, Environmental Specialist, 417-891-4300,
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U.S. Environmental Protection Agency (EPA):
Brian D'Alfonso, Biologist, 913-551-5095, dalfonso.brian@epa.gov

INSPECTION PROCEDURES

I arrived at Heavy Duty Rebuilder's Supply, Inc. and presented myself at the facility office at approximately 9:00 am on November 28, 2023. I stated that I needed to conduct a storm water inspection of the facility. I met with Mr. Day, presented my credentials, and explained the scope and purpose of the inspection. I informed him that I would be performing a complete Industrial Storm Water 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 the National Pollution Discharge Elimination System (NPDES) permit, which was issued by the Missouri Department of Natural Resources (MDNR). I explained that the

inspection would consist of a review of required records, review of the Storm Water 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. Mr. Day was able to locate most of the facility's stormwater records at the time of inspection. Mr. Day submitted the rest of the facility's records electronically after 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. I did not observe any areas of concern during this visual reconnaissance.

After the inspection, I summarized the findings of the inspection with Mr. Day during the exit meeting and left a Notice of Preliminary Findings (NOPF) on-site. See attachment 2 for the digital photographs and photo log. See attachment 3 for the facility layout.

I conducted this inspection in accordance with the procedures described herein and followed all applicable EPA Region 7 Standard Operating Procedures.

FACILITY DESCRIPTION

Facility Operations

The facility is a scrap metal recycling and auto parts re-sale facility operating under the Standard Industrial Classification (SIC) code 5093. The facility receives used auto parts and preps them for re-sale. Large auto parts, mostly consisting of motors, are stored outside. The facility encompasses approximately 5 acres of property and is located approximately one-half mile southeast of US Highway 65 and West State Highway CC in Ozark, Missouri. The facility was built in 1998, employs approximately 30 people and operates Monday through Thursday, 8:00 am to 5:30 pm and Friday 8:00 am to noon.

The facility stores used equipment and parts outside, consisting mostly of diesel engines, but includes other parts such as transmissions, differentials and other steel pieces (photos 4 & 6-8). The facility also stores parts and conducts operations indoors. All fluids including fuels and oils are stored indoors or under roof according to Mr. Day. I did not observe any storage of fluids outdoors at the time of my inspection.

Stormwater from the majority of the property flows to outfall 001 at the southcentral portion of the property (photos 5-7). Stormwater from the west end of the property flows along the west side of the main office building to a shared public drainage ditch (photo 6). From there, the drainage ditch flows to outfall 001 to combine with stormwater from the rest of the property. The facility has a concrete "sluice" to help direct stormwater from the loading docks and the central area of the facility to outfall 001 (photos 1-3). There is also a concrete drainage structure to prevent erosion just above outfall 001 that collects the majority of the stormwater from the facility (photos 6-7).

Regulatory History

Heavy Duty Rebuilder's Supply, Inc. is covered under a MDNR NPDES Individual Permit for stormwater discharges. The permit was issued on January 1, 2021, and expires September 30, 2025 (attachment 4). According to MDNR records, the facility was last inspected on August 25, 2021 (attachment 5). The inspection found two unsatisfactory findings; failure to submit discharge monitoring reports and failure to meet effluent limits.

FINDINGS AND OBSERVATIONS

An Industrial Storm Water inspection to determine whether Heavy Duty Rebuilder's Supply, Inc. is in compliance with their NPDES permit was conducted on November 28, 2023. The following findings were noted during the inspection and record review. A summary is given in the NPDES Industrial Storm Water Worksheet as attachment 1. The weather conditions at the time of the inspection were clear and sunny. According to Weather Underground, Ozark, MO received approximately one-half inch of precipitation on November 17, 2023.

During my inspection, I walked the facility grounds to observe flow paths and BMPs. I observed that the facility generally all flows to outfall 001 as described in the permit. Grass berms around the facility ensure that stormwater flows as described. The facility is well maintained (photos 4, 6-8) and BMPs around the facility, including housekeeping and those described above, appeared to be working as designed.

Sampling

The facility's NPDES permit requires that the facility conduct sampling of a stormwater event at least once per quarter. The facility must sample for flow, precipitation, chemical oxygen demand, oil and grease, pH, settleable solids, total suspended solids, aluminum, copper, iron, lead, manganese, zinc, benzene and surfactants. The facility's permit includes limits for oil and grease, pH, settleable solids, aluminum and iron.

Prior to the inspection, I obtained a spreadsheet of the discharge monitoring report (DMR) data for the facility from the EPA Region 7 data team. The spreadsheet containing the DMR reports included data from December 2018 through September 2023. Facility personnel provided me with copies of the facility's DMRs and analytical reports that were used to submit the DMR values. All DMR data obtained for this report can be found on ECAD's electronic file management system. Since 2018, the facility's samples have exceeded the permitted limits for aluminum 11 times and pH once. The lower limit for pH in their permit is 6.5, and in September of 2022, the facility reported a result of 6.48. The exceedances for aluminum can be found in Table 1. This was noted as item #1 on the Notice of Preliminary Findings (NOPF) that was left on-site after the inspection.

Table 1: Reported Effluent Limit Exceedances for Aluminum (ug/L)

Date (monitoring period)	Limit	Reported Value
December 2018	750	1588
June 2019	750	1577
March 2020	750	968

June 2020	750	969
September 2020	750	855
March 2021	750	946
June 2022	750	1340
September 2022	750	763
December 2022	750	1450
June 2023	750	1450
September 2023	750	948

This inspection was originally scheduled as a sampling inspection. Due to the lack of precipitation at the time of inspection, no samples were collected. While discussing the facility's exceedances, I noticed that the facility's sampling point for Outfall 001 (photos 5 & 6) is at a culvert in the road ditch bordering the street in front of the facility. The road ditch collects stormwater from the entire facility, but also collects stormwater from multiple facilities upstream from the facility. At a minimum, this includes all facilities to the west as far as state highway NN and at least one facility to the south. This would increase the opportunity for off-site contamination that could affect samples taken at outfall 001.

Storm Water Pollution Prevention Plan (SWPPP)

The facility's NPDES permit requires that the facility have a SWPPP. Mr. Day provided me a copy of the facility's SWPPP at the time of inspection. After the inspection, Mr. Day emailed me a copy of the SWPPP that was present during the inspection and a copy of the facility's SWPPP that was updated after the inspection. The SWPPP that I reviewed at the time of inspection had a revision date of September 8, 2013 (attachment 6). The SWPPP that was provided to me after the inspection had a revision date of November 29, 2023 (attachment 7).

The SWPPP was last updated approximately 10 years prior to my inspection. Since the SWPPP was last updated, the facility had made multiple changes to their operations, specifically expanding the footprint of the facility. The SWPPP did not include operations on the expanded portion of the property, such as buildings and material storage, or include the entire footprint of the facility. This was noted as item #2 on the NOPF that was left on-site after the inspection.

The facility's permit requires that the SWPPP include a map with outfalls and structural BMPs marked. The SWPPP map did not include the outfall location and did not include the concrete erosion control structure that is just upstream of Outfall 001 (photos 6 & 7). This is noted as item #3 in the summary of this report. The SWPPP map that is included with the updated SWPPP, includes both of these items.

The SWPPP does include a provision for at least monthly inspections as required by the permit. At the time of inspection, the facility was conducting weekly inspections of the site for stormwater. The SWPPP also provides a provision for training as required by the permit. Mr. Day explained that the facility does conduct stormwater training, and from the condition of the site during my inspection, it appeared that facility personnel are trained. Mr. Day was unable to provide documentation of training, even though it appears the facility is conducting adequate training. This is noted as item #4 in the summary of this report.

During the exit briefing on November 28, 2023, I discussed the findings of my inspection and left a NOPF on-site for the following (attachment 2):

1. Failure to meet effluent limits.
2. SWPPP is out of date. Update SWPPP to include current facility boundaries and operation.

After the inspection, the following potential summary findings were determined:

3. Failure to mark outfalls and all structural BMPs on SWPPP map.
4. Failure to document stormwater training as required by the permit.

On November 30, 2023, Mr. Day submitted a response to the NOPF (attachment 9).

**BRIAN
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Brian D'Alfonso
Biologist

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Jodi Bruno
Branch Manager, ECAD/WB

ATTACHMENTS:

1. NPDES Industrial Storm Water Worksheet (6 pages)
2. Notice of Potential Findings (NOPF) (1 page)
3. Photo Log and Photos (9 pages)
4. MDNR permit number MO0135313 (46 pages)
5. August 25, 2021, MDNR Inspection Report (7 pages)
6. September 8, 2013, Heavy Duty Rebuilders, Inc. SWPPP with Site Maps (33 pages)
7. November 29, 2023, Heavy Duty Rebuilders, Inc. SWPPP with Site Maps (33 pages)
8. November 30, 2023 Facility Response (2 pages)