United States Environmental Protection Agency

MULTI-SECTOR GENERAL PERMIT NON-FILER INSPECTION CHECKLIST

Inspection Date(s):	2/7/2023	
Time:	**Entry:** 11:40 AM	**Exit:** 1:12 PM
Weather Conditions:	Cloudy with temperatures approximately 35° F	
Media/Program:	Water – CWA § 301, 402 – Industrial SW/NEC	
Operator Name:	Price's Auto Salvage (formerly B F Leidy & Sons Inc.)	
Facility or Site Name:	Price's Auto Salvage	
Permit ID or Tracking #:	Unpermitted at the time of the inspection	
SIC Code:	5015 – Motor Vehicle Parts, Used The Facility representative was unsure of the Facility's SIC code. The SIC code was determined by referencing Dun & Bradstreet, a global business data and analytics company, and was inferred by the Inspector based on the industrial activities occurring at the time of the inspection.	
Facility Address:	282 S Kinzer Rd.	
(city, state, zip code)	Paradise, PA 17562	
Geographic Coordinates:	39.9746°, -76.0609°	
Mailing address:	282 South Kinzer Road	
(city, state, zip code)	Paradise, PA 17562	
County:	Lancaster	
Regular Days/Hours of Operation:	Monday – Friday, 8:00 AM – 4:00 PM; Saturday 8:00 AM – 12:00 PM	
# of Employees at location:	2 full time	
Size of Facility (in acres):	Estimated 10 acres	
Receiving Water(s):	No observed receiving water hydrologic connection	
Date facility est. @ location:	Facility representative stated he purchased the business 15 years ago	
Onsite Representatives:		
Name: William Price	Title: Owner	Phone: (717) 442-4277
	Email: belindageesey@aol.com	
Authorized Official: →	Contacted? ☒Yes ☐No	
Name: William Price	Title: Owner	Phone: (717) 442-4277
	Email: belindageesey@aol.com	
Inspector(s):		
Taylor Fontaine (PG Environmental)	Title: Inspector	Phone: (703) 956-1977
Ivy Koberlein (U.S. EPA Headquarters)	Title: Inspector	Phone: (202) 564-2549
Monica Crosby (U.S. EPA Region III)	Title: Inspector	Phone: (410) 305-2930
Inspection Report Author:		
Name: Taylor Fontaine	Signature: Taylor Fontaine	Date: 3/29/2023
Supervisor Review:		

Name: Jessica Duffy	Signature: JESSICA DUFFY Digitally signed by JESSICA DUFFY Date: 2023.04.18 13:35:24 -04'00'	Date: 4/18/23

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 Clean Water Act (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) On February 7, 2023, U.S. Environmental Protection Agency (EPA) contractor, PG Environmental, conducted an unpermitted industrial facility stormwater inspection at Price's Auto Salvage located in Paradise, Pennsylvania (Facility). Taylor Fontaine of PG Environmental, Ivy Koberlein of U.S. EPA (EPA) Headquarters, and Monica Crosby of EPA Region III (EPA Inspection Team) met with the Facility representative. Taylor Fontaine displayed his CWA credentials, and the EPA Inspection Team conducted an opening conference. The EPA Inspection Team explained the purpose of the inspection was to document the facility's industrial activity and any obligations to apply for a National Pollutant Discharge Elimination System (NPDES) Permit (Permit). At the time of the inspection, the Facility did not have coverage under a Permit.

   Weather conditions at the time of the inspection were cloudy with temperatures of approximately 35° F. There was no precipitation during the inspection. According to precipitation data from the National Oceanic and Atmospheric Administration (NOAA)[1], the Paradise, Pennsylvania area received no rain the day before the inspection.

2) Credentials presented to: William Price – Owner

3) Facility acknowledged receiving previous outreach materials or correspondence on Permit requirements? ☐Yes ☒ No

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

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

FACILITY'S OPERATION & PRODUCT DESCRIPTION
The Facility comprises an estimated 10 acres located on South Kinzer Road in the City of Paradise, Pennsylvania. The Facility is bordered by private land to the north, forested land to the west and south, and S Kinzer Rd to the east. The Facility includes one (1) building used for vehicle maintenance and storage. The remainder of the property is used for vehicle and fluid storage. According to the Facility representative, the Facility primarily receives used automobiles, but also receives various scrap metals (e.g., copper, brass, aluminum, steel) from public sources for processing and resale. The vehicles received are either "end of life" vehicles with fluids removed prior to delivery, or they need to be drained onsite. The Facility representative stated that the vehicles are put on a rack outdoors to be drained over a concrete slab, or directly on the dirt. Industrial operations conducted outside and exposed to stormwater include used vehicle storage, fluid draining, waste fluid and scrap metal storage. Indoor operations include materials and fluid storage. **Other industrial facilities owned/operated by same business entity? ☐Yes ☒No Describe:**

SECTION II – OBSERVATIONS

SITE EVALUATION	
Pollutant Sources	**Observations**
Loading/Unloading Operations	The Facility has one (1) entrance off South Kinzer Road where vehicles and materials are dropped off.
Industrial Manufacturing/ Processing Operations	According to the Facility representative and observed by the EPA Inspection Team, the Facility conducts vehicle fluid removal and parts removal operation outside in an uncovered area without containment for spills and leaks.
Industrial Machinery & Equipment Storage	The EPA Inspection Team observed outside uncovered storage areas for machinery and Facility equipment (refer to Appendix B, Photographs DSCN5209 and DSCN5213).
Storage of Industrial Materials or Products	The EPA Inspection Team observed covered and uncovered storage areas for industrial materials. At the time of the inspection, uncovered totes were housing spare vehicle parts; used tires and engines were being stored on the ground without cover; and a scrap metal storage area, comprised of large dumpster bins, was observed at the south end of the Facility (refer to Appendix B, Photographs DSCN5192, DSCN5196, DSCN5200, DSCN5203, and DSCN5246).
Liquid Storage (e.g., Tanks, Liquid Storage Drums)	The EPA Inspection Team observed the following liquid storage tanks/drums at the Facility: • Two (2) (55-gallon) barrels of waste oil located inside the Facility shop (refer to Appendix B, Photographs DSCN5188

SITE EVALUATION	
	and DSCN5189). • Two (2) estimated 275-gallon totes storing waste oil located outside by the Facility shop (refer to Appendix B, Photographs DSCN5196 and DSCN5204). • One (1) 250-gallon tank containing off-road diesel located adjacent to the Facility shop (refer to Appendix B, Photographs DSCN5204). It was undetermined if the tank was double-walled, and the EPA inspection team did not infer. There was no containment for the tank. • An additional eleven (11) estimated 275-gallon totes storing waste oil located outside (refer to Appendix B, Photographs DSCN5206 and DSCN5207). None of the waste oil containers had secondary containment or cover.
Waste Storage/Disposal Areas (solid and/or hazardous)	The EPA Inspection Team observed waste oil being stored inside in 55-gallon drums and waste oil being stored outside in 275-gallon totes without cover or containment (refer to Appendix B, Photographs DSCN5188, DSCN5189, DSCN5196, DSCN5204, DSCN5206, and DSCN5207).
Waste Treatment Facilities (e.g., Pretreatment Systems)	There were no observed waste treatment facilities onsite.
Fueling Stations/Equipment Maintenance Areas & Cleaning Areas	The EPA Inspection Team observed one (1) 250-gallon tank containing off road diesel located adjacent to the Facility shop (refer to Appendix B, Photographs DSCN5204). According to the Facility representative, the tank is used to fuel onsite machinery. It was undetermined if the tank was double-walled, and the EPA inspection team did not infer. There was no observed containment for the tank.
Sediment & Erosion Controls	The EPA Inspection Team did not observe any evidence of sediment and erosion controls at the time of the inspection.
Spills/Leaks Handling	The EPA Inspection Team observed a general overall lack of good housekeeping measures at the Facility, including: • One (1) engine leaking oil to the ground adjacent to the fluid draining station (refer to Appendix B, Photograph DSCN5202); • At least nine (9) locations with spilled or leaked petroleum products or stains located both inside and outside (refer to Appendix B, Photographs DSCN5188, DSCN5193, DSCN5194, DSCN5199, DSCN5200, DSCN5201, DSCN5204, DSCN5209, and DSCN5214). • The facility did not employ spill response measures or

SITE EVALUATION	
	secondary containment for stored waste fluids.
Outside Shelters	☐ **Temporary (Date Established_____)** ☐ **Permanent** None observed.
Evidence of non-stormwater sources/discharges (allowable if permitted under MSGP)?	None observed.
Evidence of process wastewater sources/discharges?	The EPA Inspection Team did not observe any evidence of process wastewater sources/discharge.
OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS	
Number and description of each potential Stormwater Discharge Point from the Facility	The EPA Inspection Team observed two (2) primary locations that had the potential for discharge offsite due to the topography and slope of Facility grounds. These locations include the northeast corner of the Facility and the northwest corner (refer to Appendix B, Photographs DSCN5225 and DSCN5238).
Evidence of pollutants migrating offsite (stains, deposits, ponding) at discharge points, into Receiving Waters or in MS4	None observed.
Evidence of Non-stormwater Discharges leaving site (authorized or unauthorized)	None observed.
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 Facility is mostly flat, comprising an estimated 95% gravel/dirt and the remaining 5% concrete. Those areas that are not flat direct stormwater northwest offsite to a wooded ravine and northeast to a ditch and eventually to a wooded swale. The Facility contains only one inlet that conveys stormwater from the area around the primary maintenance and storage building to one of the used vehicle areas (refer to Appendix B, Photographs DSCN5214 and DSCN5198). The EPA Inspection Team did not find a direct connection with any surface waterbody or MS4 infrastructure.

SITE EVALUATION	
	Refer to Appendix A for an aerial view of the Facility and estimated stormwater flow paths.

SECTION III – AREAS OF CONCERN

1) The EPA Inspection Team observed the Facility was used for buying and selling used vehicle parts, an industrial activity classified under SIC Code 5015 – Motor Vehicle Parts, Used.
    a. Businesses classified under SIC Code 5015 are regulated under 40 C.F.R. § 122.26 for stormwater discharges associated with industrial activity.
    b. Vehicle and vehicle parts storage, fluid removal, and loading/unloading operations occur outside and are exposed to stormwater.
    c. The Facility did not have coverage under a Permit at the time of the inspection.

2) The EPA Inspection Team observed numerous outdoor areas at the Facility with scrap or waste vehicle parts exposed to stormwater (refer to Appendix B, Photographs DSCN5192, DSCN5196, DSCN5200, DSCN5203, and DSCN5246).

3) The EPA Inspection Team observed waste oil totes stored outside without cover or secondary containment (refer to Appendix B, Photographs DSCN5206 and DSCN5207).

4) The EPA Inspection Team observed a general overall lack of good housekeeping measures at the Facility. Specifically, the EPA Inspection Team saw at least nine (9) locations with spilled or leaked petroleum product or stains located both inside and outside (refer to Appendix B, Photographs DSCN5188, DSCN5193, DSCN5194, DSCN5199, DSCN5200, DSCN5201, DSCN5204, DSCN5209, and DSCN5214).

5) The EPA Inspection Team observed that the Facility was conducting maintenance activities (including changing/draining fluids) on used vehicles outside without cover or containment (refer to Appendix B, Photograph DSCN5201).

SECTION IV – CLOSING CONFERENCE

After the site walk, the EPA Inspection Team met with the Facility representative from Price's Auto Salvage for a closing conference and shared preliminary observations. The EPA Inspection Team reiterated that all preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared were subject to further investigation by the EPA Inspection Team. Additional observations may be contained in this inspection report that were not identified at the time of the closing conference.

The inspection concluded at approximately 1:12 PM (EST).

SECTION V – LIST OF APPENDICES

Appendix A – Aerial Map
Appendix B – Photograph Log

Appendix A. Aerial Map

Clean Water Act Inspection
Price's Auto Salvage

Inspection Date: February 7, 2023

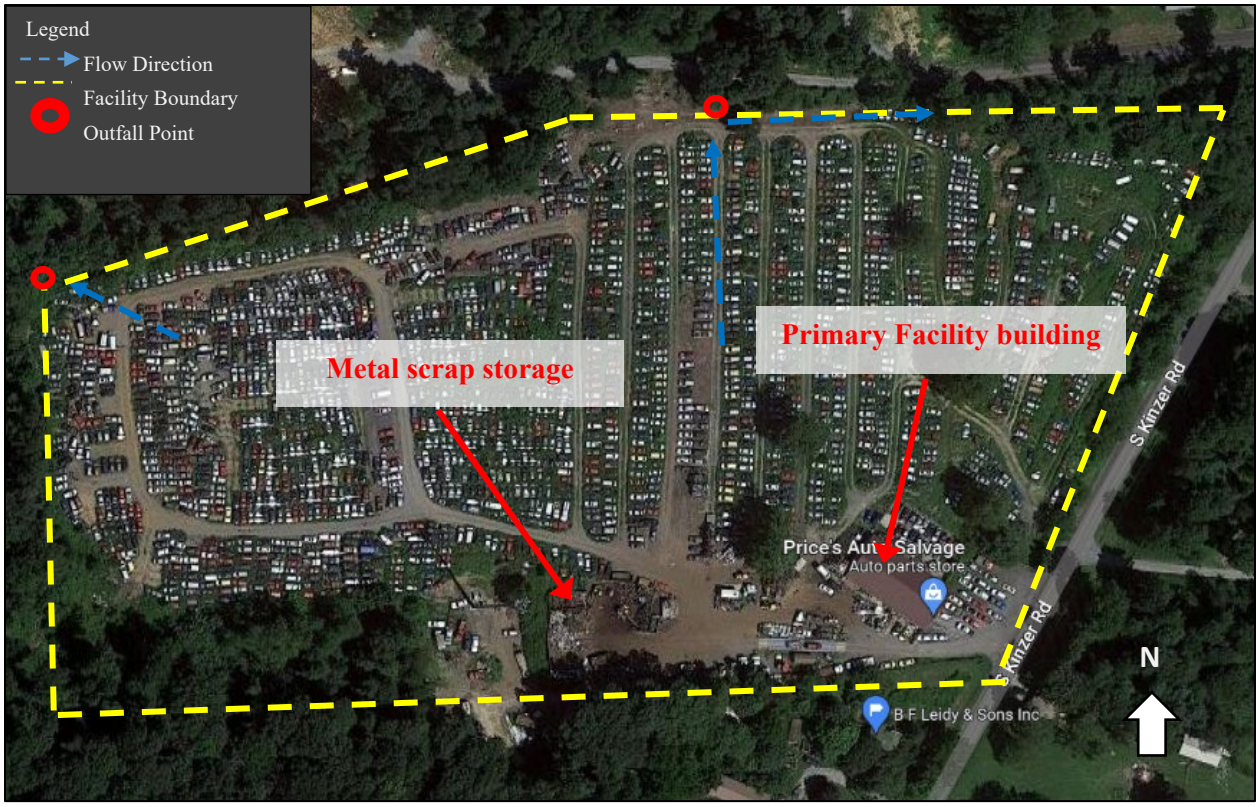


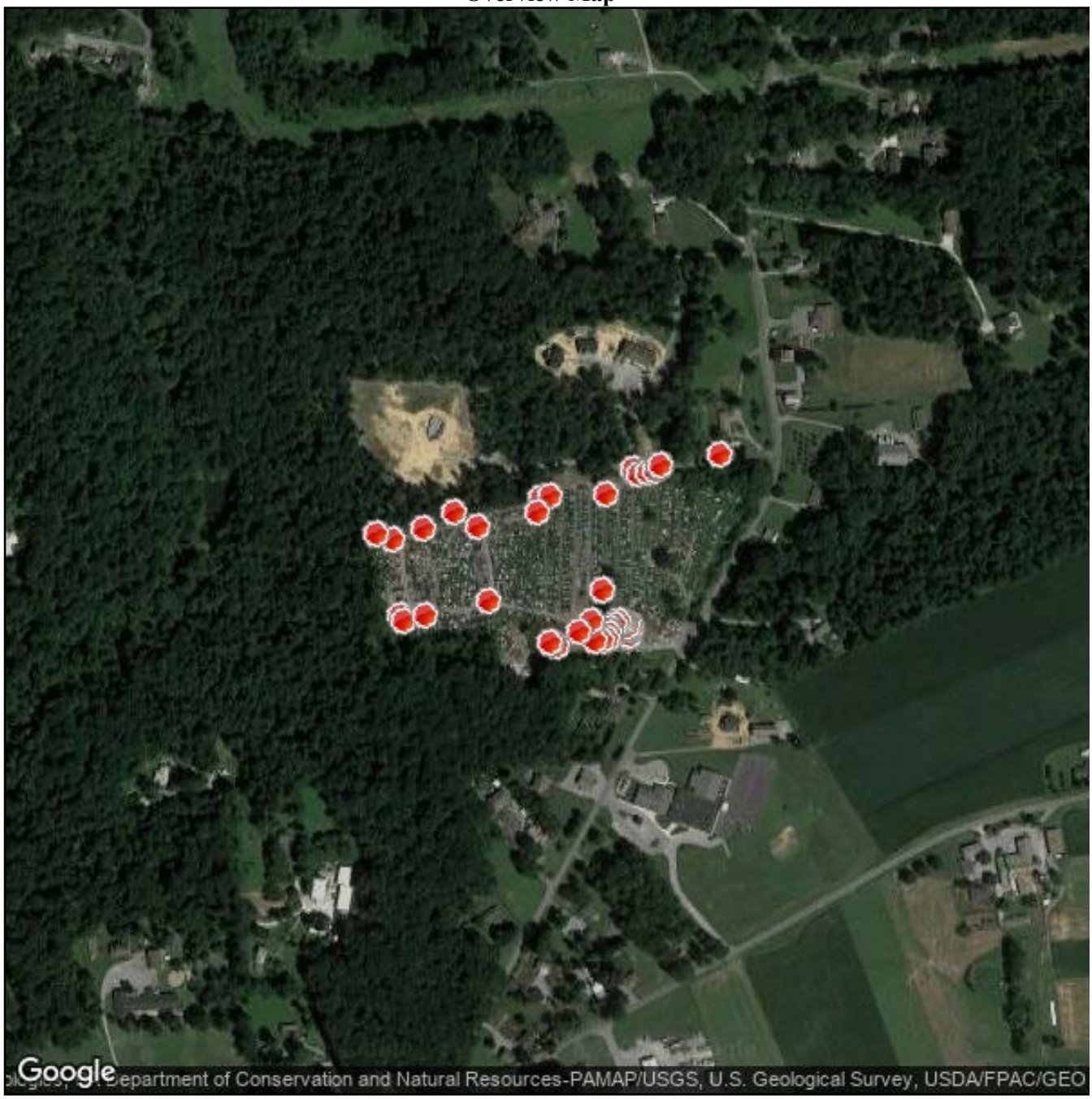
Figure 1. *Aerial Image of Price's Auto Salvage from Google Maps (dated 2023).*

Appendix B. Photograph Log
Clean Water Act Inspection
Price's Auto Salvage

Inspection Date: February 7, 2023

*** Disclaimer:** All photos were taken on 2/7/2023. Some photographs do not contain GPS coordinates.

Overview Map



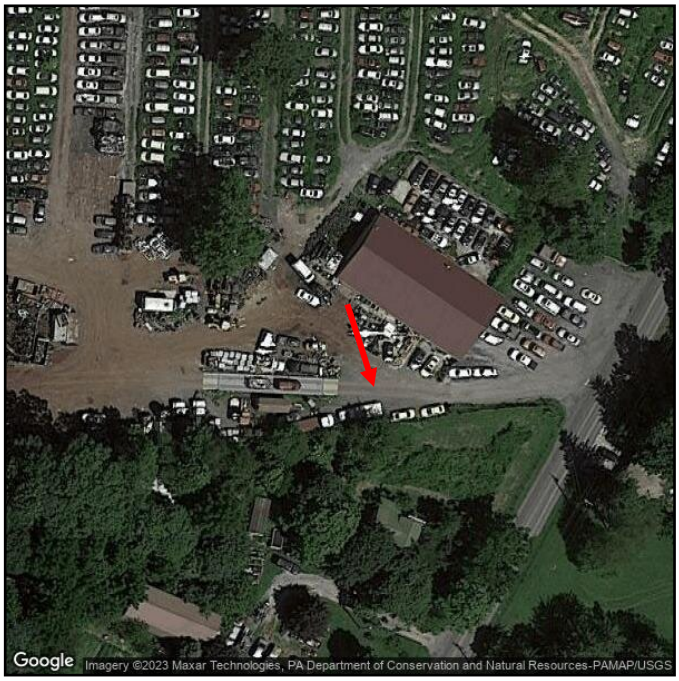
Photograph Location

Description	Waste oil stored inside the primary Facility building without secondary containment. Note the absorbent material on the ground.

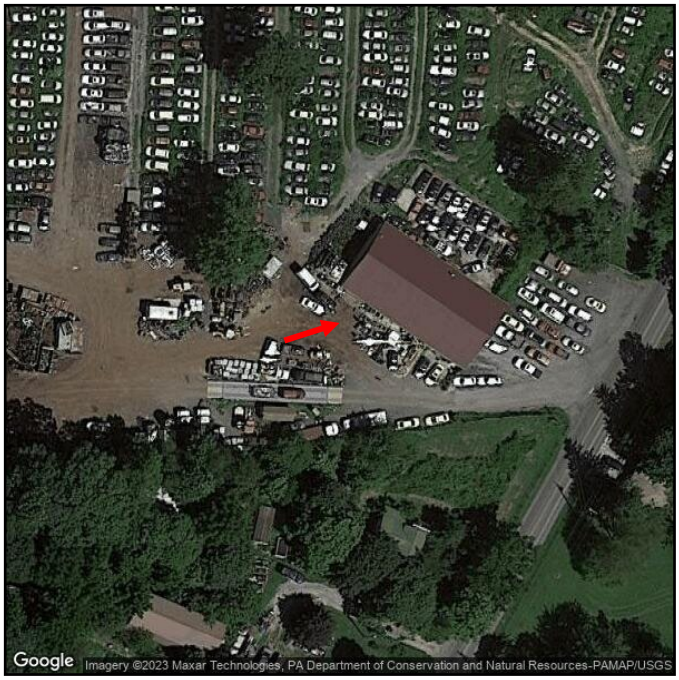
Description	Waste oil storage inside the primary Facility building shown in Photograph DSCN5188. Note the lack of secondary containment measures.

Description	Waste oil storage inside the primary Facility building. Note the absorbent material on the ground and the lack of secondary containment measures.

Description	Scrap copper stored inside the primary Facility building.

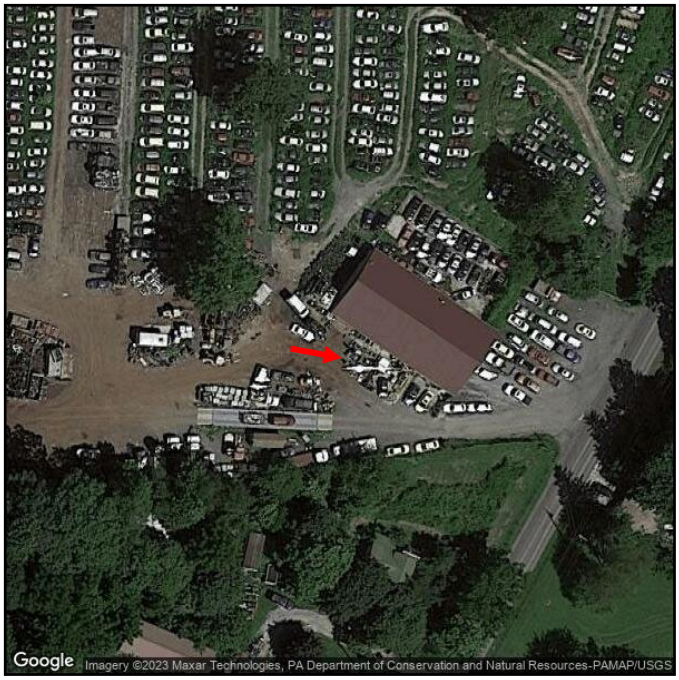


Description	Automotive parts stored outside the primary Facility building without cover.

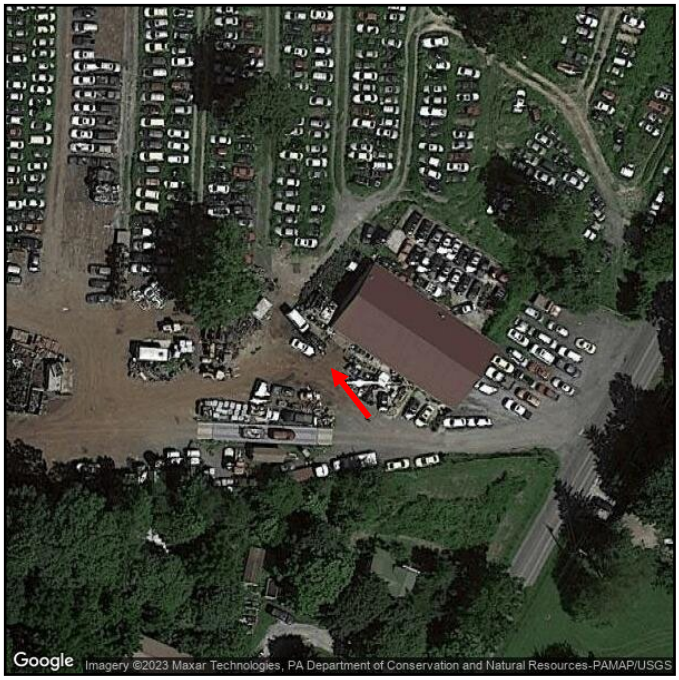


Description	Leaking oil from the automotive parts storage container shown in Photograph DSCN5192.

Description	Petroleum staining on the ground adjacent to vehicle parts stored outside without cover.

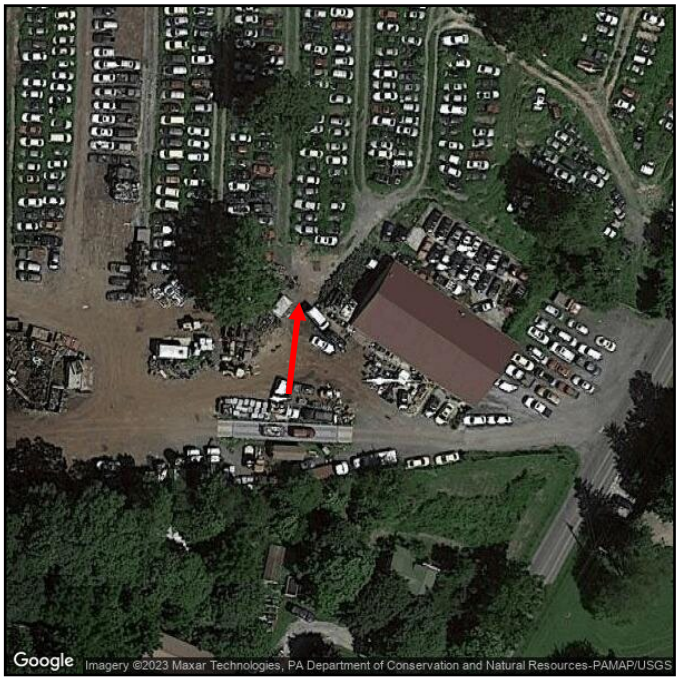


Description	Vehicle parts stored outside without cover adjacent to the primary Facility building.

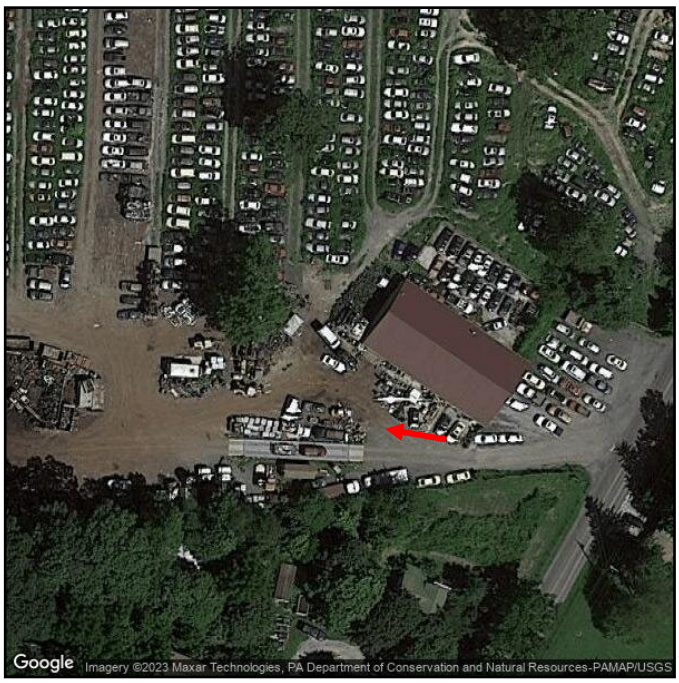


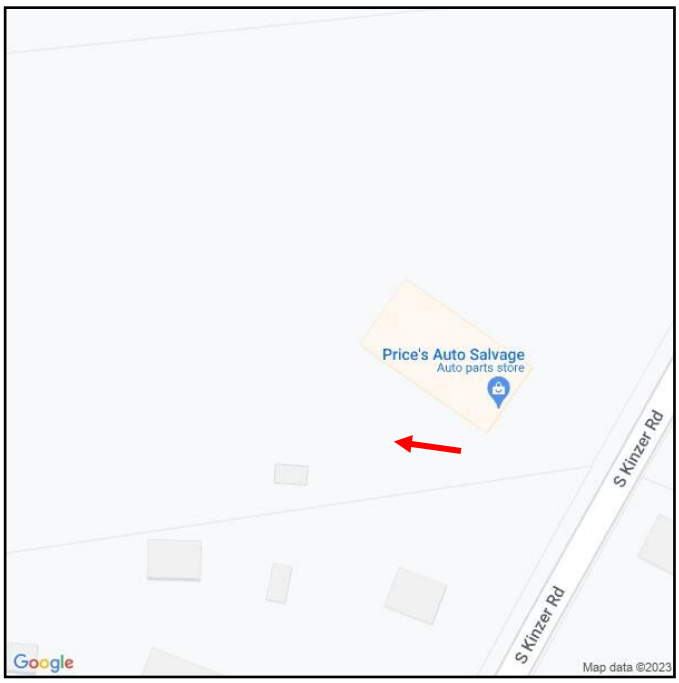
Description	Various vehicle parts being stored outside, as well as a 275-gallon waste oil tote without secondary containment.

Description	Various vehicle parts being stored outside, as well as a 275-gallon waste oil tote shown in Photograph DSCN5196.



Description	Storm drain inlet connected to the outlet pipe shown in Photograph DSCN5214. Note the lack of inlet protection.



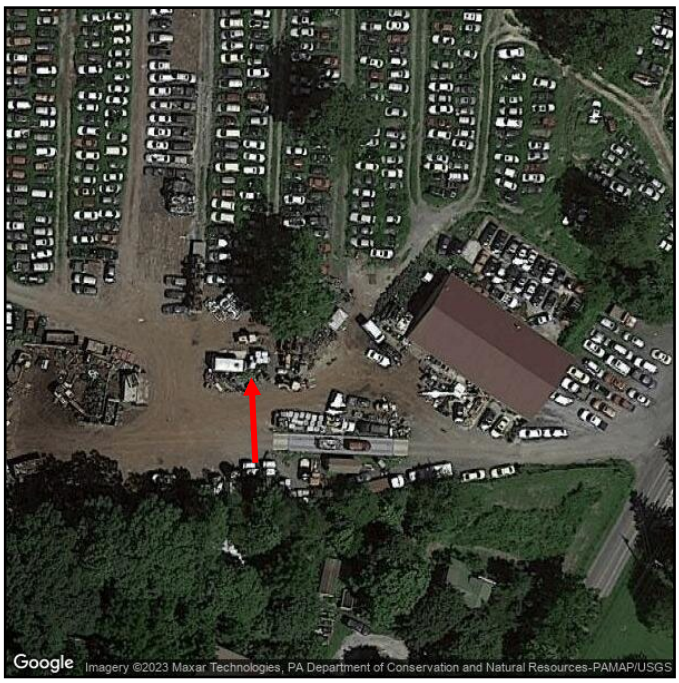


Description	Petroleum stain on the compacted dirt near the primary Facility building.

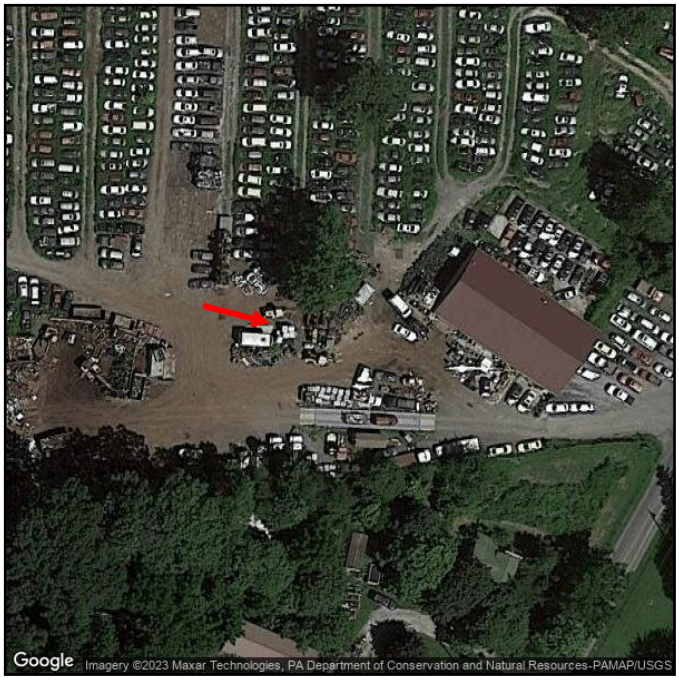
Description	Used engines leaking oil on the adjacent compacted dirt ground surface.

Description	Facility fluid removal station that, according to the Facility representative, is sometimes moved to the adjacent concrete slab. Note the petroleum staining around the station. The fluid removal station did not have cover or containment for spills and leaks.

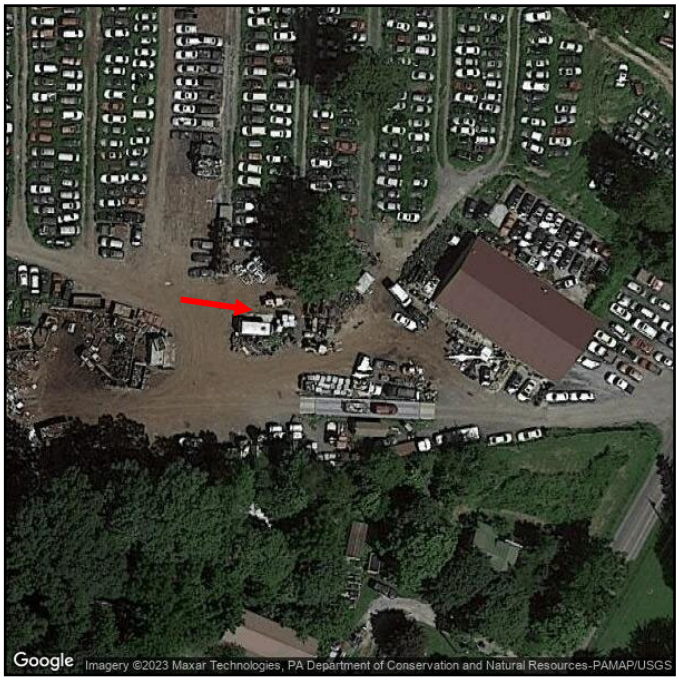
Description	Used engines leaking oil to the ground next to the fluid removal station shown in Photograph DSCN5200.



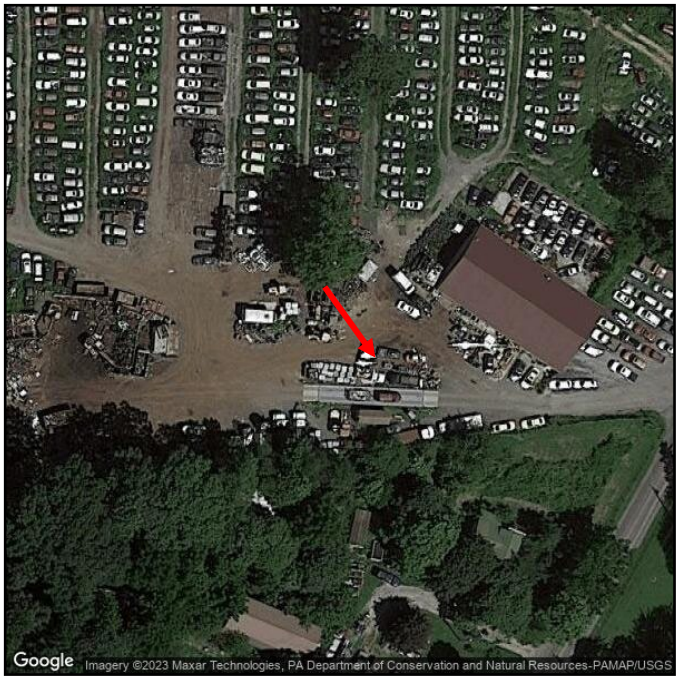
Description	Used vehicle tires and rims being stored outside without cover in the middle of the Facility.



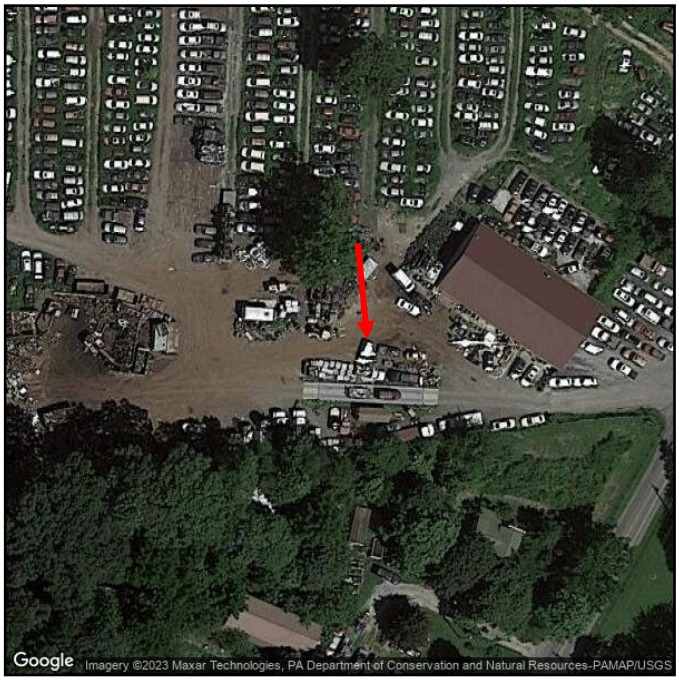
Description	Approximately 250-gallon tank of off-road diesel and a tote of waste oil. Note the staining on the adjacent ground surface. It was unclear if the tank was double-walled and secondary containment was not provided for the waste oil tote.



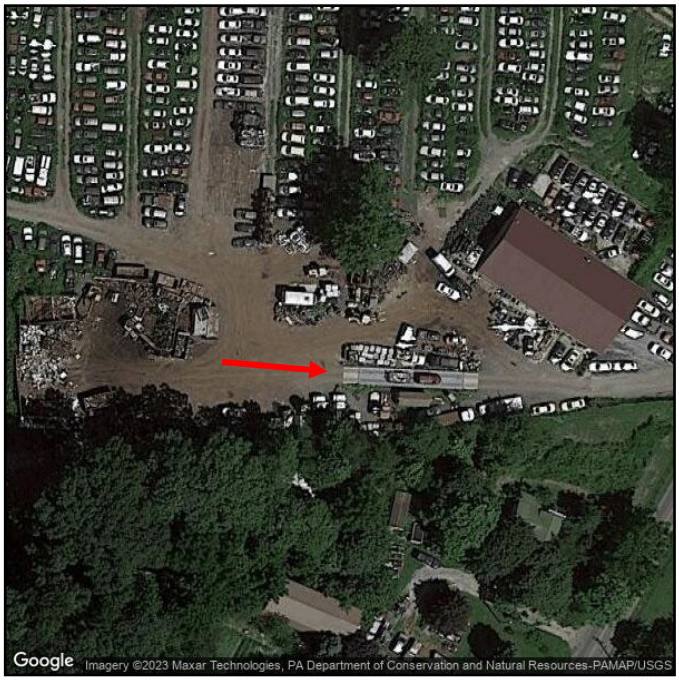
Description	Closer view of the petroleum staining shown in Photograph DSCN5205.



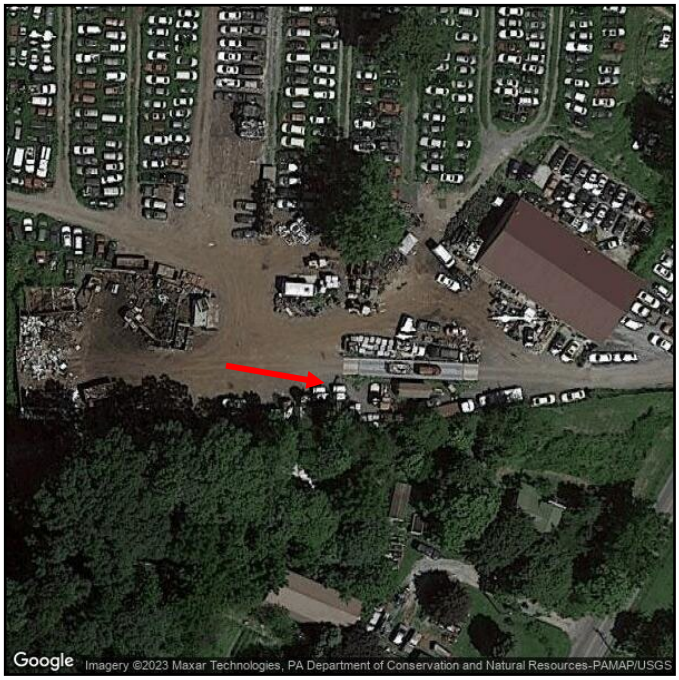
Description	Approximately eleven 275-gallon waste oil totes, of which 7 appeared to be full at the time of the inspection. None of the totes had secondary containment.



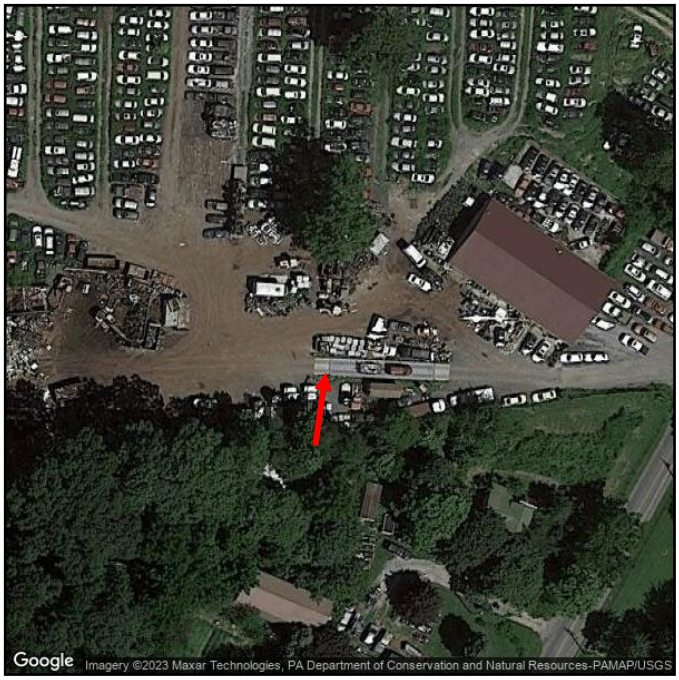
Description	Approximately eleven 275-gallon waste oil totes shown in Photograph DSCN5206, of which 7 appeared to be full.



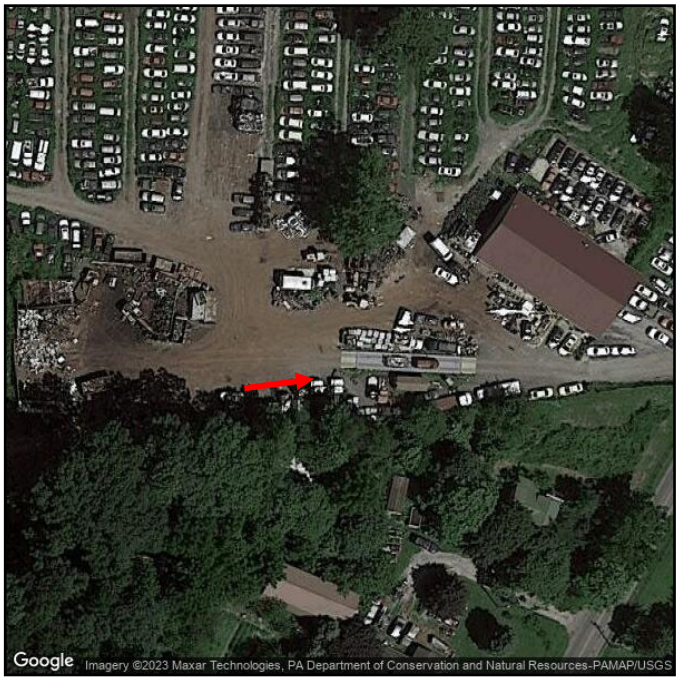
Description	Truck scale located in the south portion of the Facility.



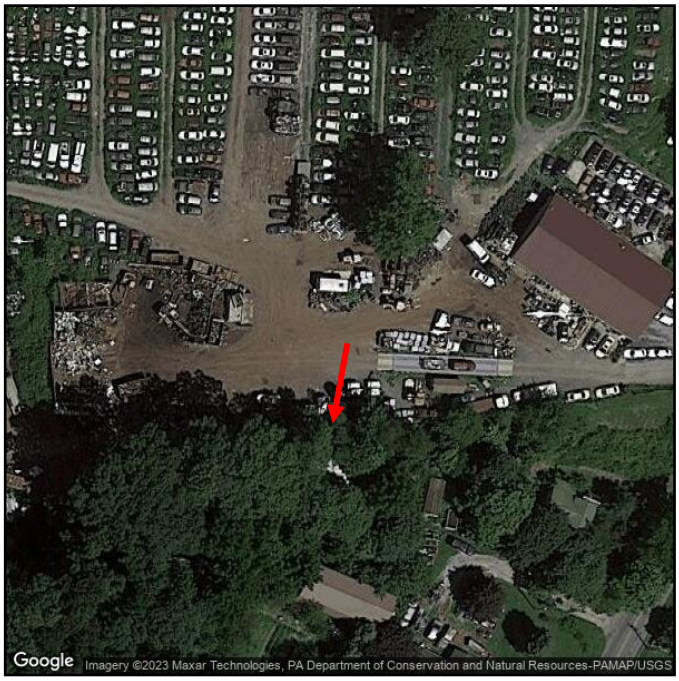
Description	Petroleum product leak on the ground surface in the south area of that Facility.



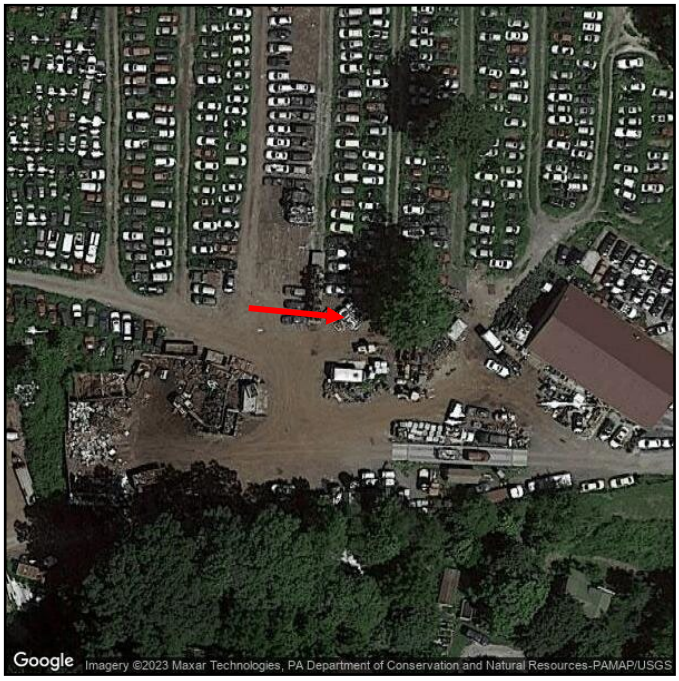
Description	Approximately eleven 275-gallon waste oil totes shown in Photographs DSCN5206 and DSCN5207, of which 7 appeared to be full. None were equipped with secondary containment.



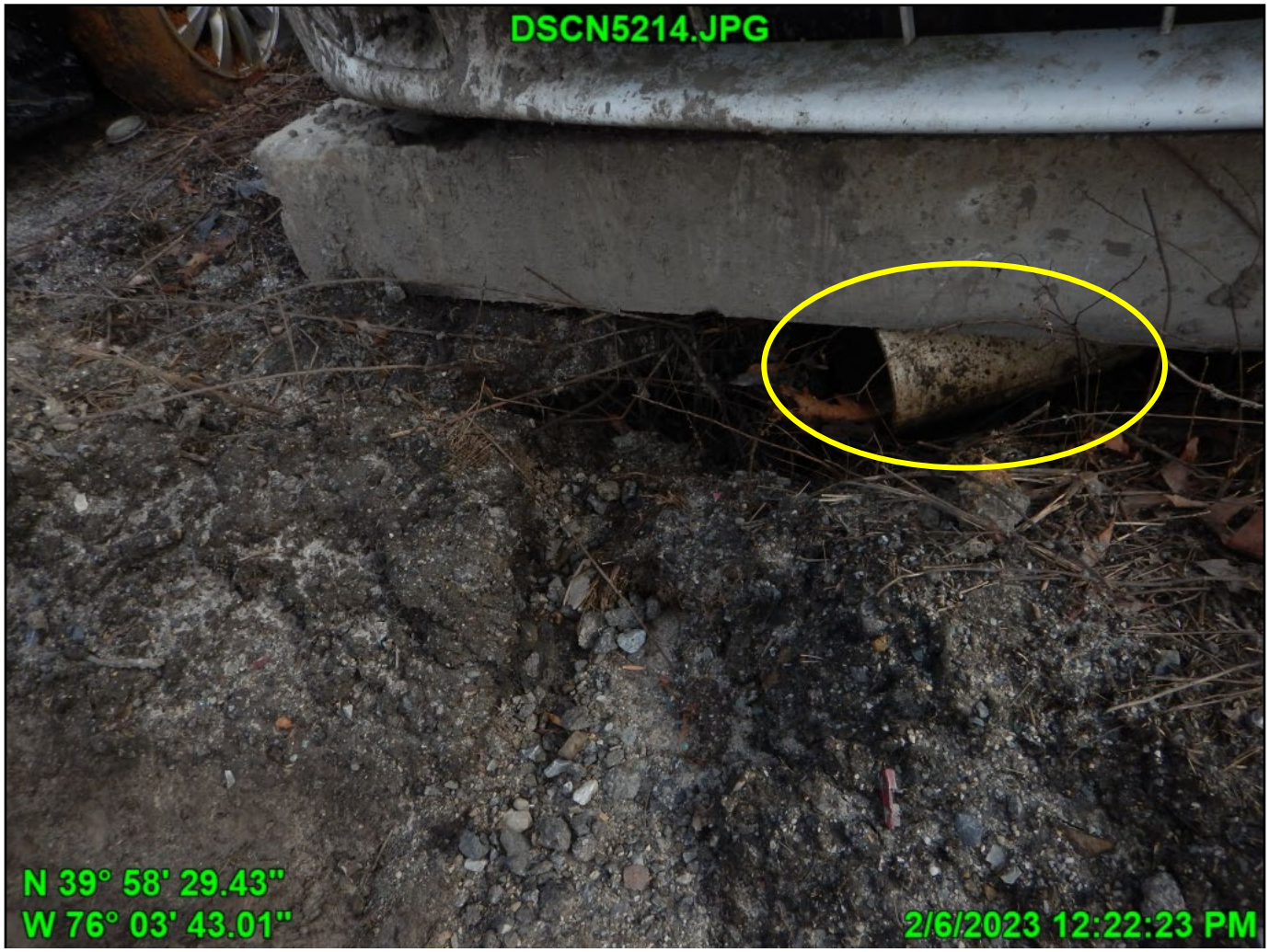
Description	Petroleum product leak onto the ground surface in the south area of the Facility, shown in Photograph DSCN5209.

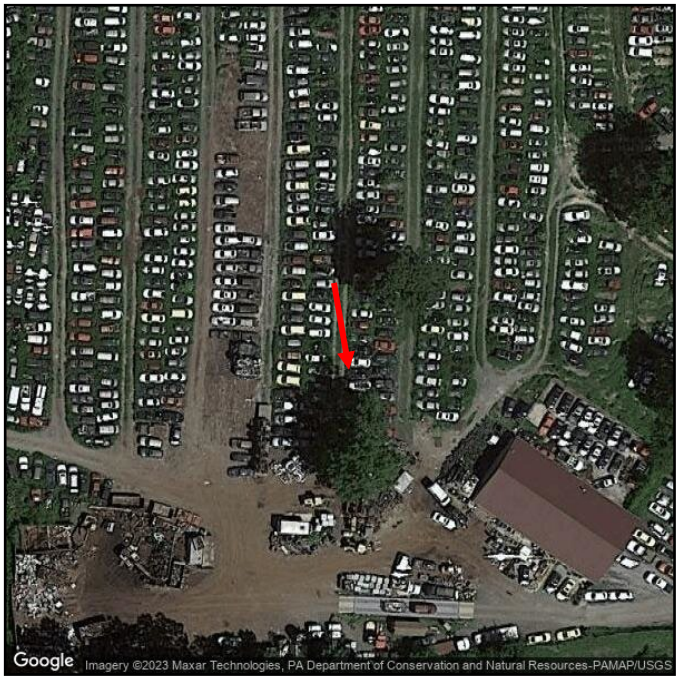


Description	Waste storage roll-off located in the south portion of the Facility.



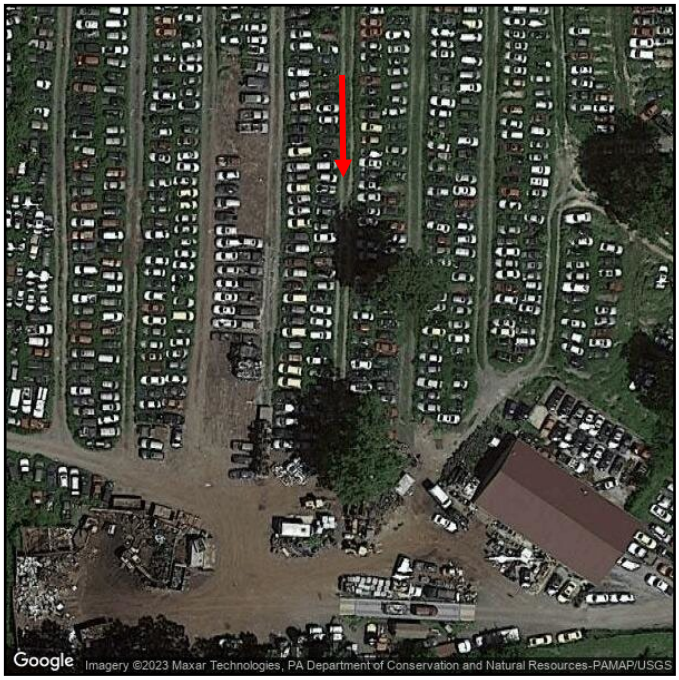
Description	Car crusher located in the middle of the Facility.



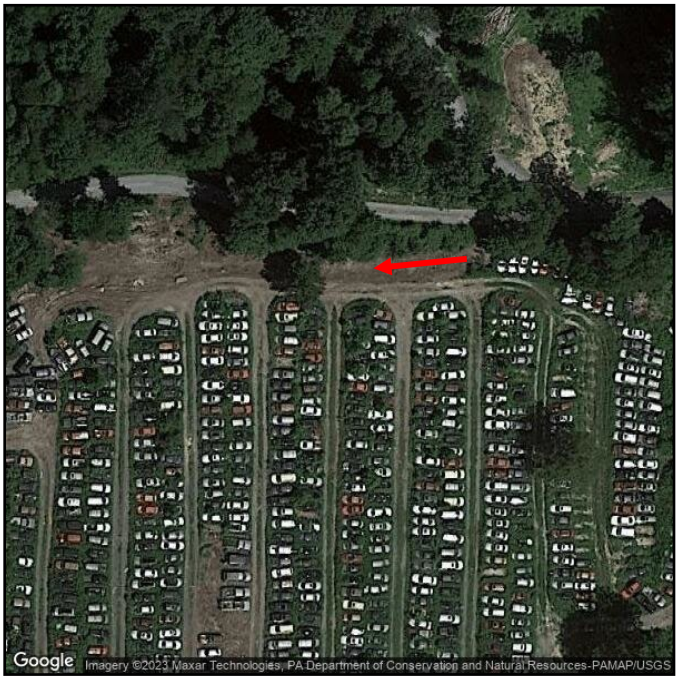


Description	Petroleum staining from flow from the adjacent pipe. This pipe connects to the inlet shown in Photograph DSCN5198.

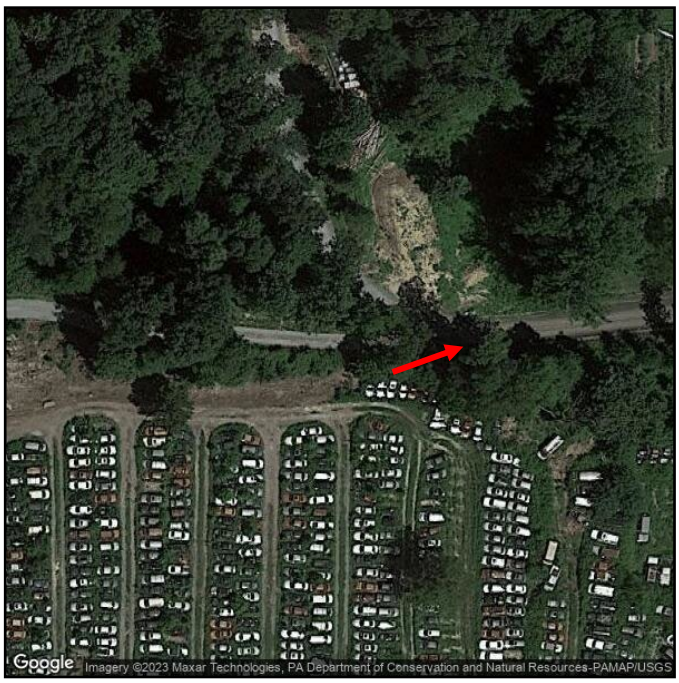
Description	Used vehicle storage in the middle of the Facility.

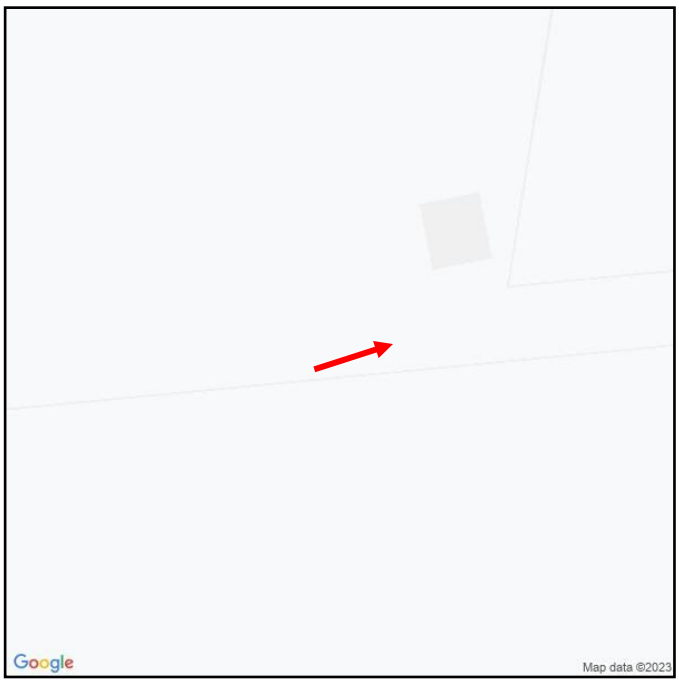


Description	Used vehicle storage in the middle of the Facility.

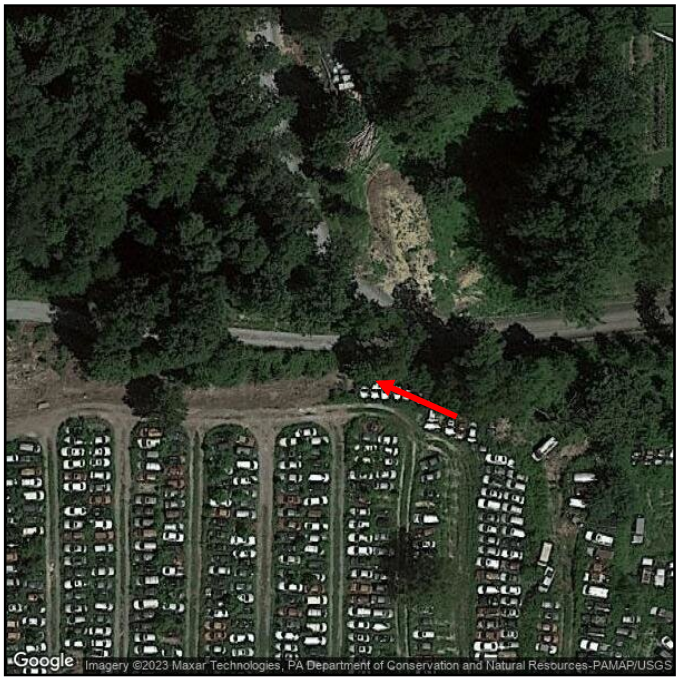


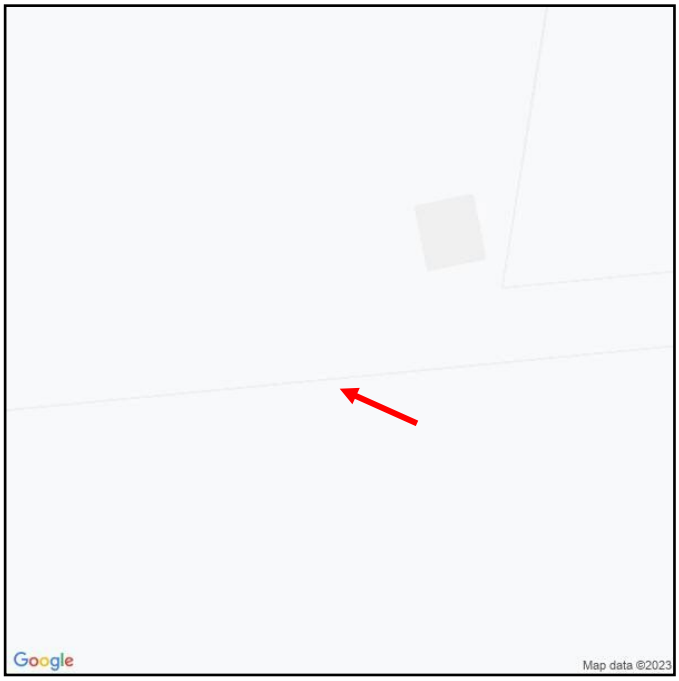
Description	Northern boundary for the Facility. According to the Facility representative, an adjacent property owner installed the berm.



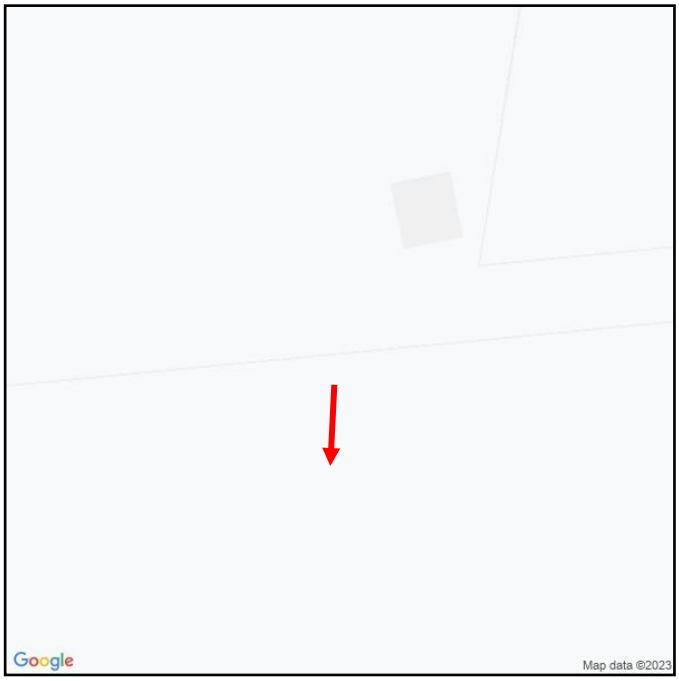


Description	Northern boundary for the Facility. The road services several adjacent properties and the sediment tracking appeared to be from construction on one of the adjacent properties.

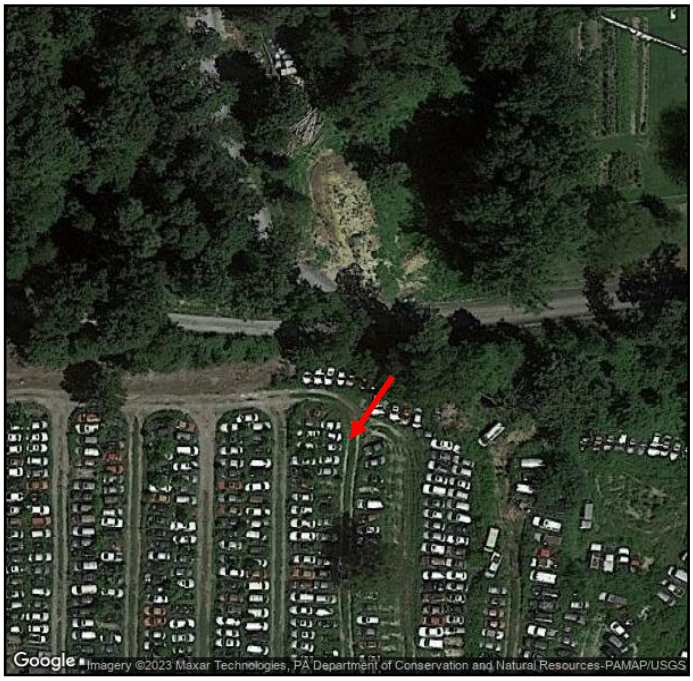


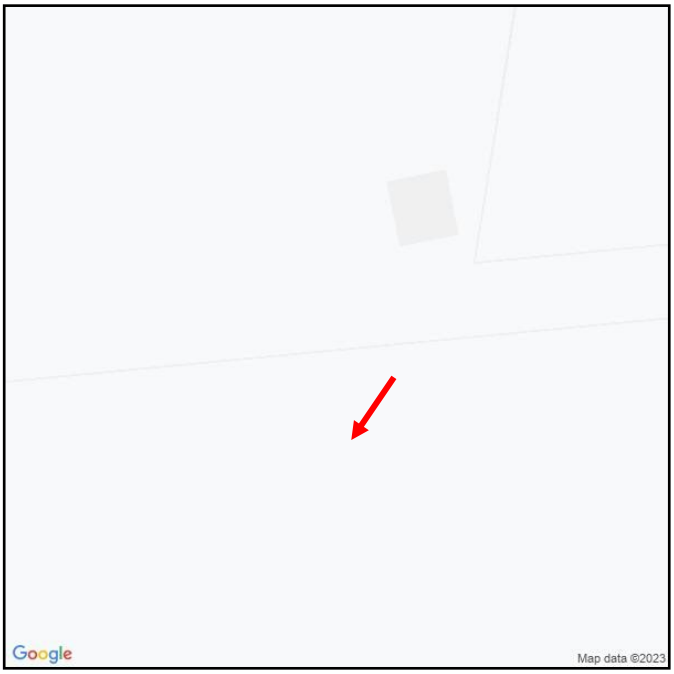


Description	Additional view of the northern boundary for the Facility shown in Photograph DSCN5128. The road services several adjacent properties.

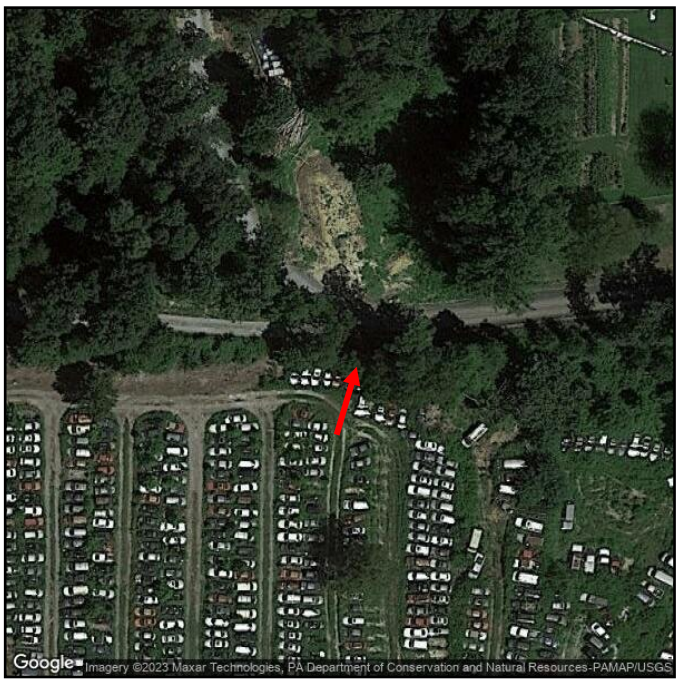


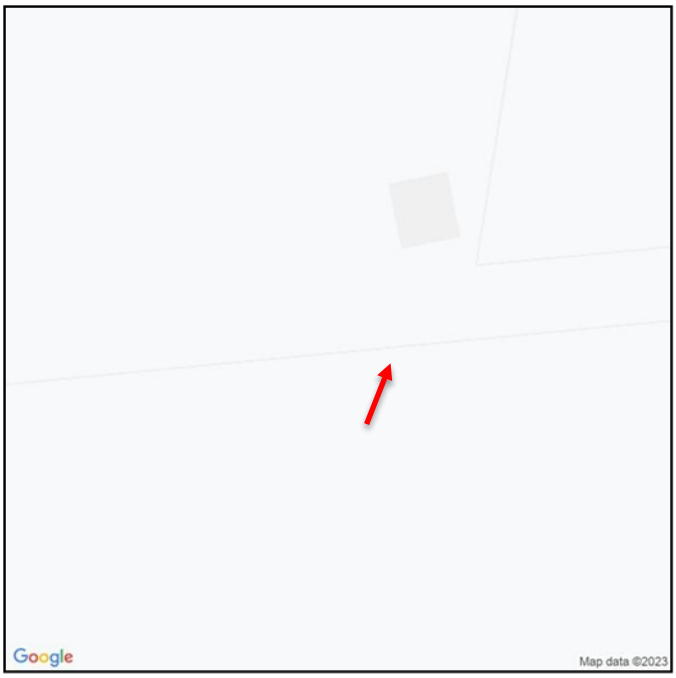
Description	Upgradient view of the used vehicle storage area in the north portion of the Facility.



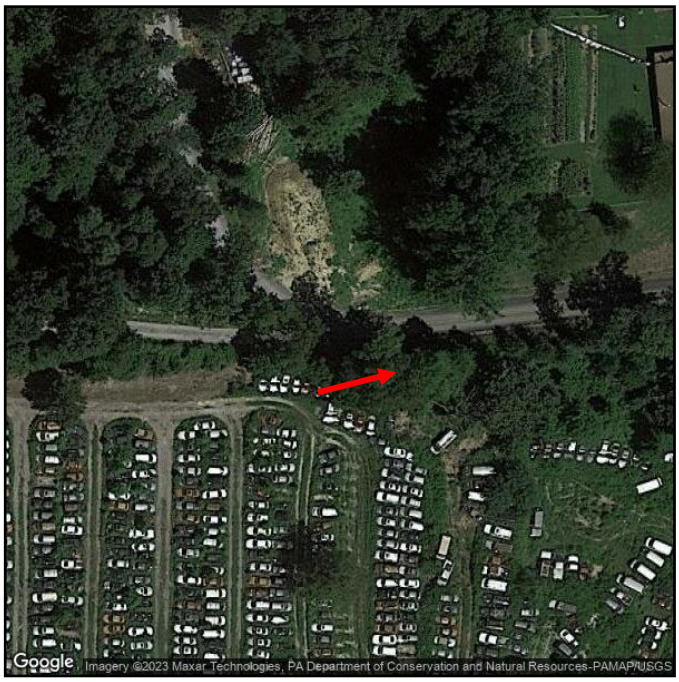


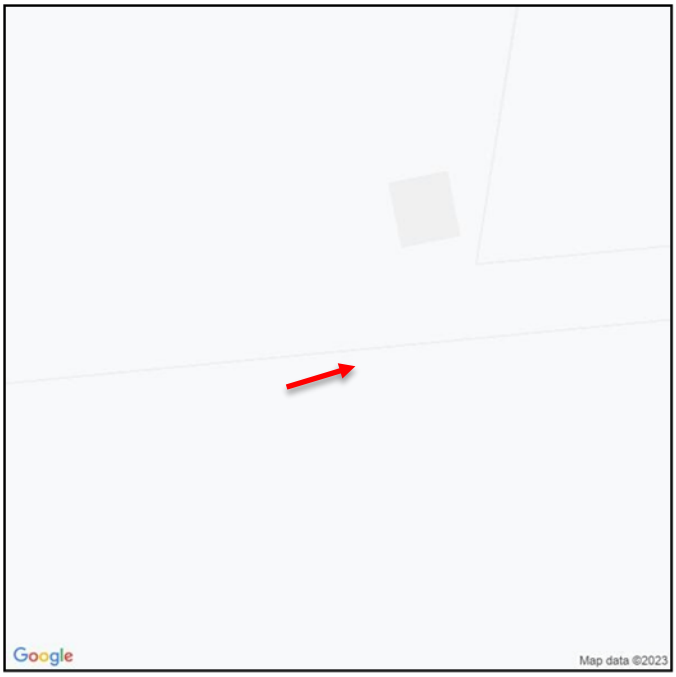
Description	Estimated drainage path towards the ravine on the northern Facility boundary shown in Photographs DSCN5223 and DSCN5224.



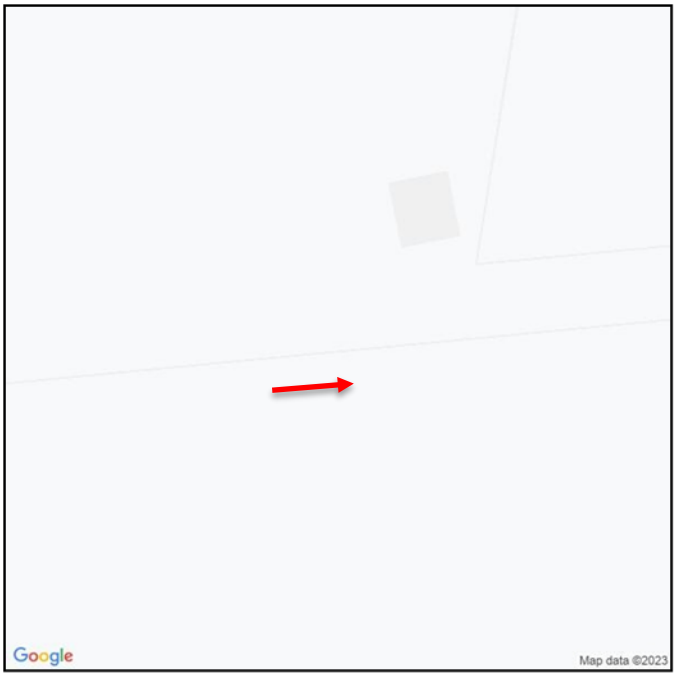


Description	Additional view of the northern boundary for the Facility shown in Photograph DSCN5219. The private road services several adjacent properties.

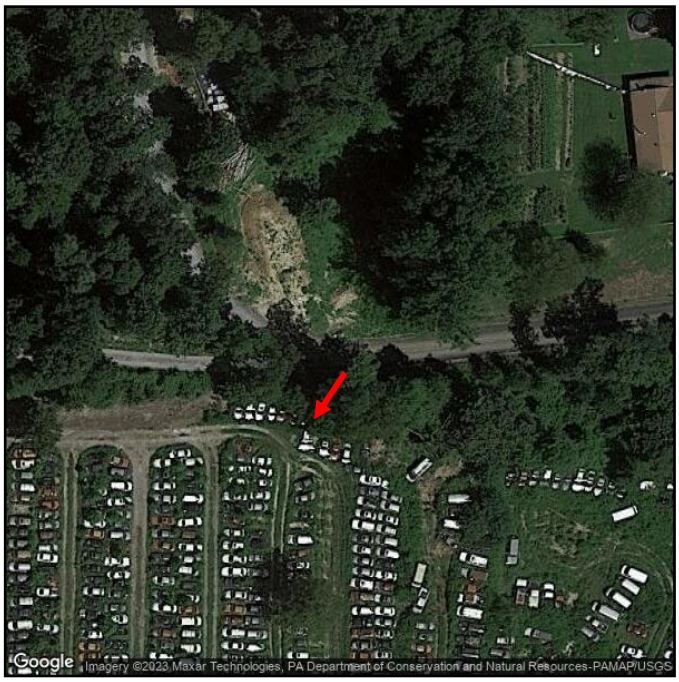


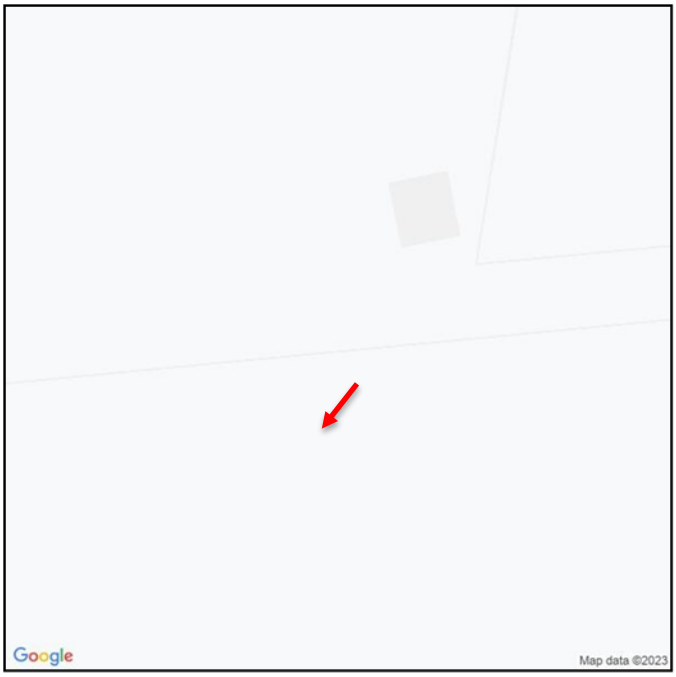


Description	Observed entrance to the ravine located on the Facility's northern boundary. Note the estimated direction of stormwater flow.

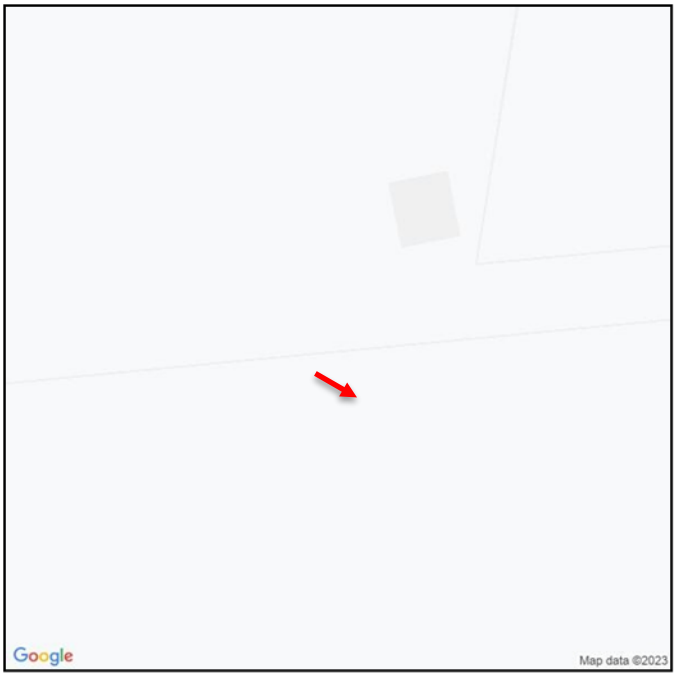


Description	Ravine located on the Facility's northern boundary shown in Photograph DSCN5223. Note the direction of stormwater path.

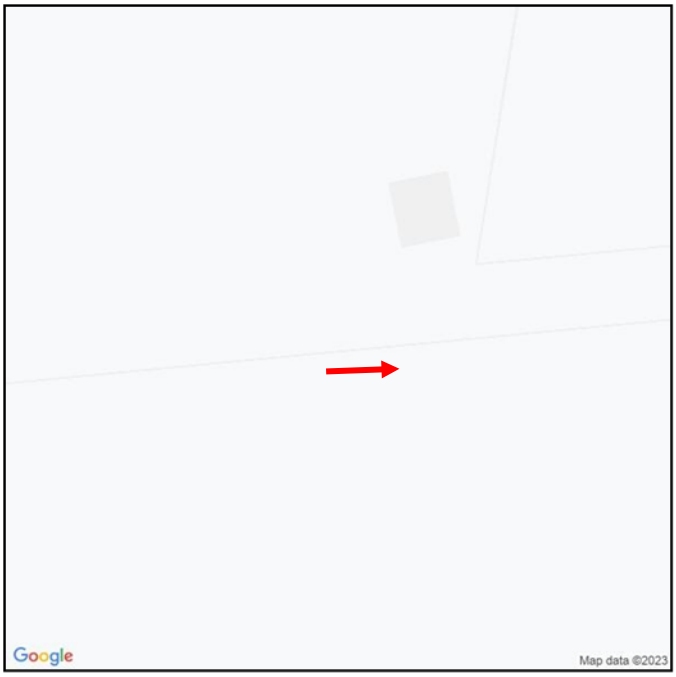




Description	Upgradient view of the slope above the ravine located on the Facility's northern boundary, also shown in Photograph DSCN5222. Note the estimated direction of stormwater flow.

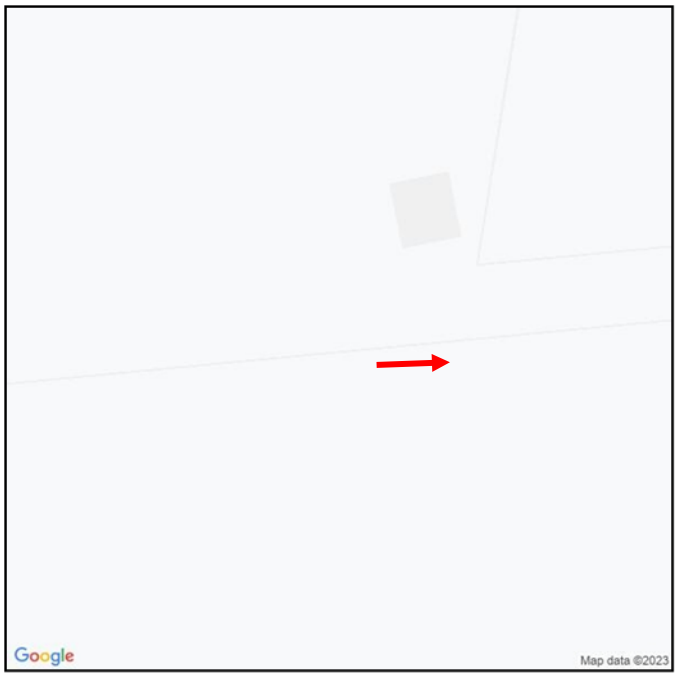


Description	Ravine slope located on the Facility's northern boundary as shown in Photograph DSCN5224. Note the estimated direction of stormwater flow.

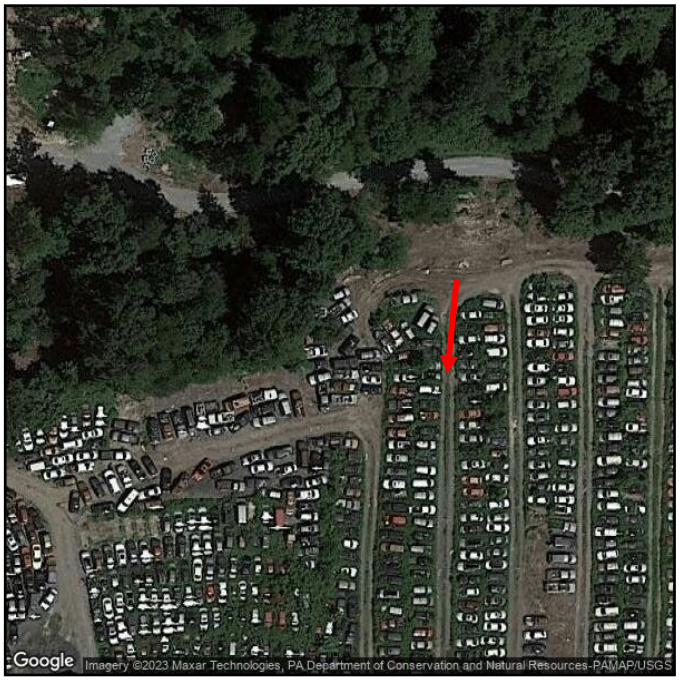


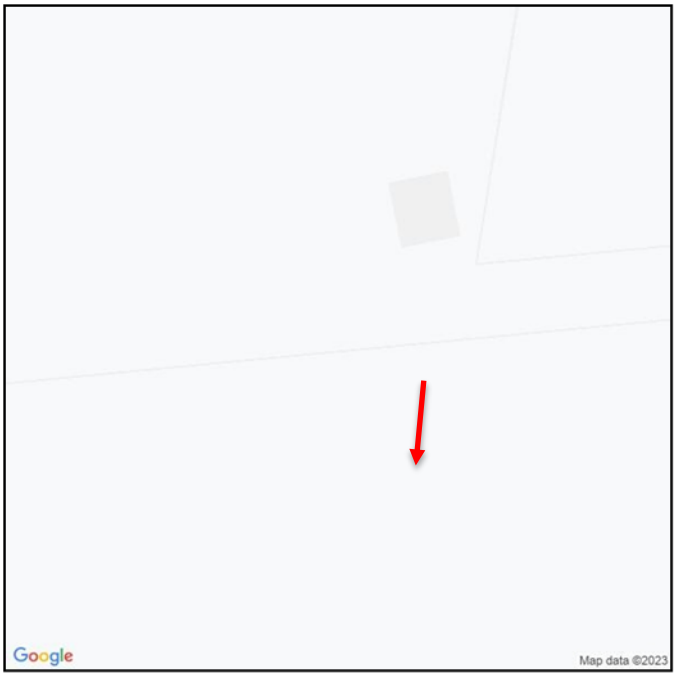
Description	Ravine on the northern Facility boundary. Note the estimated direction of stormwater flow.

Description	Ravine on the northern Facility boundary shown in Photograph DSCN5227. Note the estimated direction of stormwater flow.

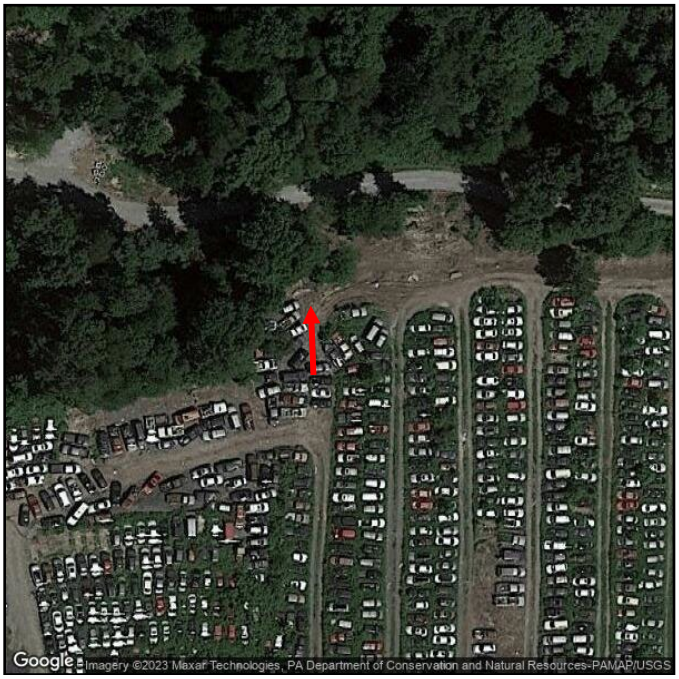


Description	Catch basins on a road adjacent to the Facility. The Facility representative stated that the catch basins drain to a swale located on private property across South Kinzer Road. The inspectors observed that it would be unlikely that a Facility stormwater discharge would enter these catch basins.



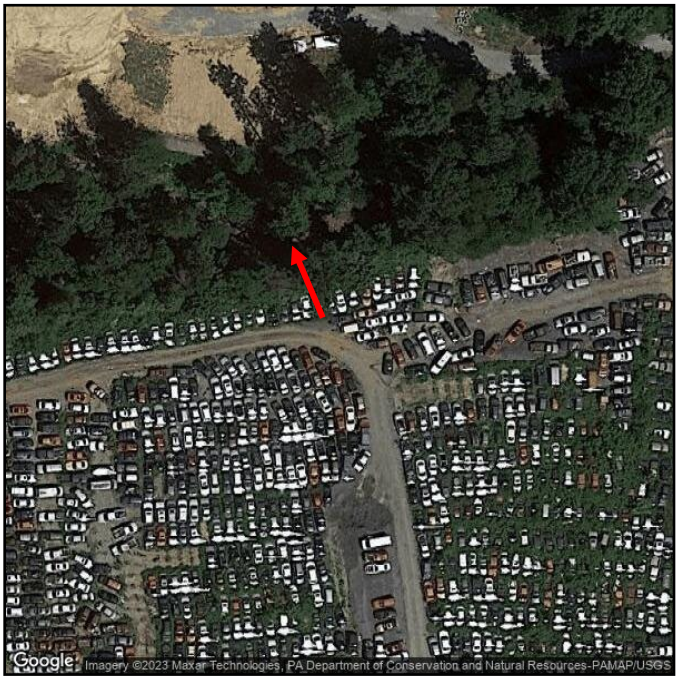


Description	Scrap vehicles stored in the north portion of the Facility.



Description	North boundary berm for the Facility shown in Photograph DSCN5217.

Description	Open bucket containing an unknown liquid in the north part of the Facility.

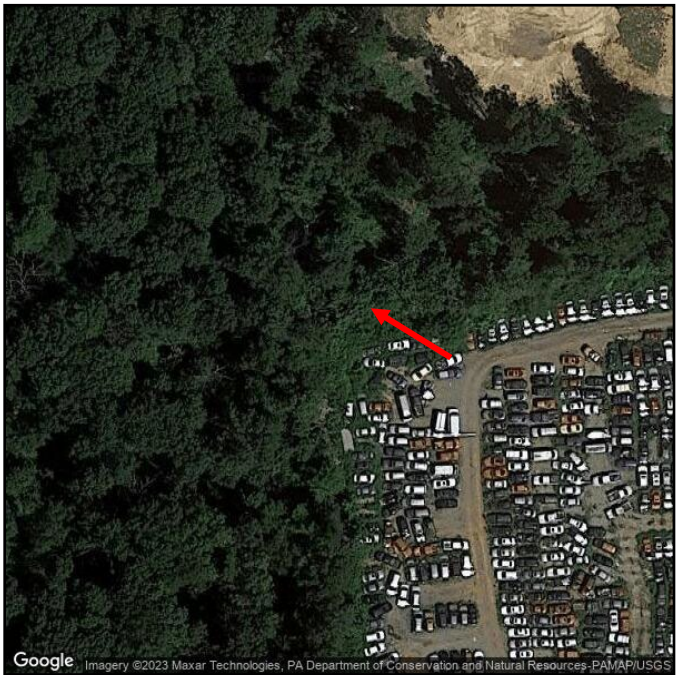


Description	View looking north, off property to an adjacent wooded area north of the Facility.

Description	View off property to an adjacent wooded area north of the Facility shown in Photograph DSCN5233.

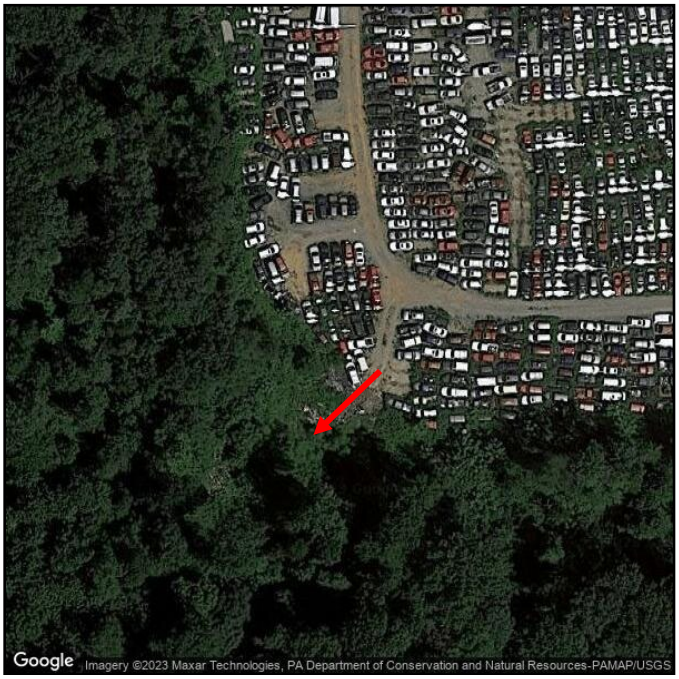
Description	View off property to an adjacent wooded area northwest of the Facility.

Description	View off property to an adjacent wooded area shown in Photograph DSCN5235.

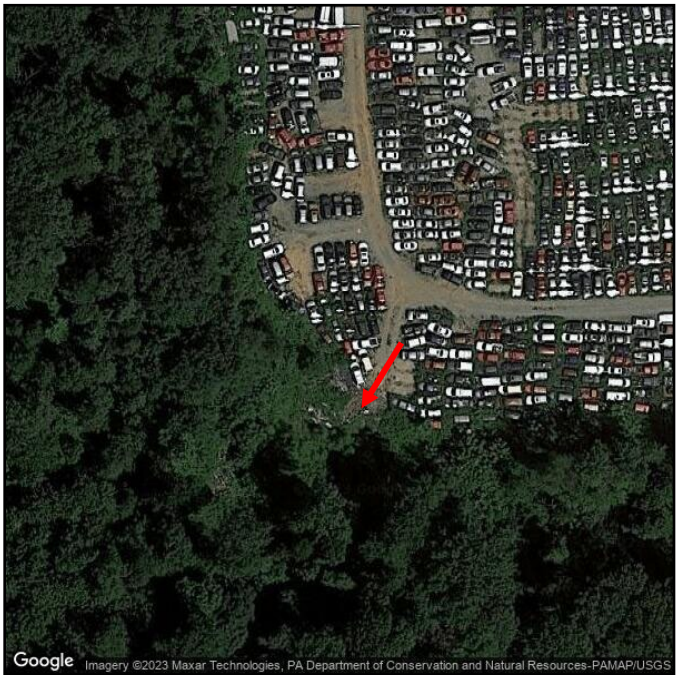


Description	View off property to an adjacent wooded area shown in Photograph DSCN5236.

Description	View off property to an adjacent wooded area northwest of the Facility.

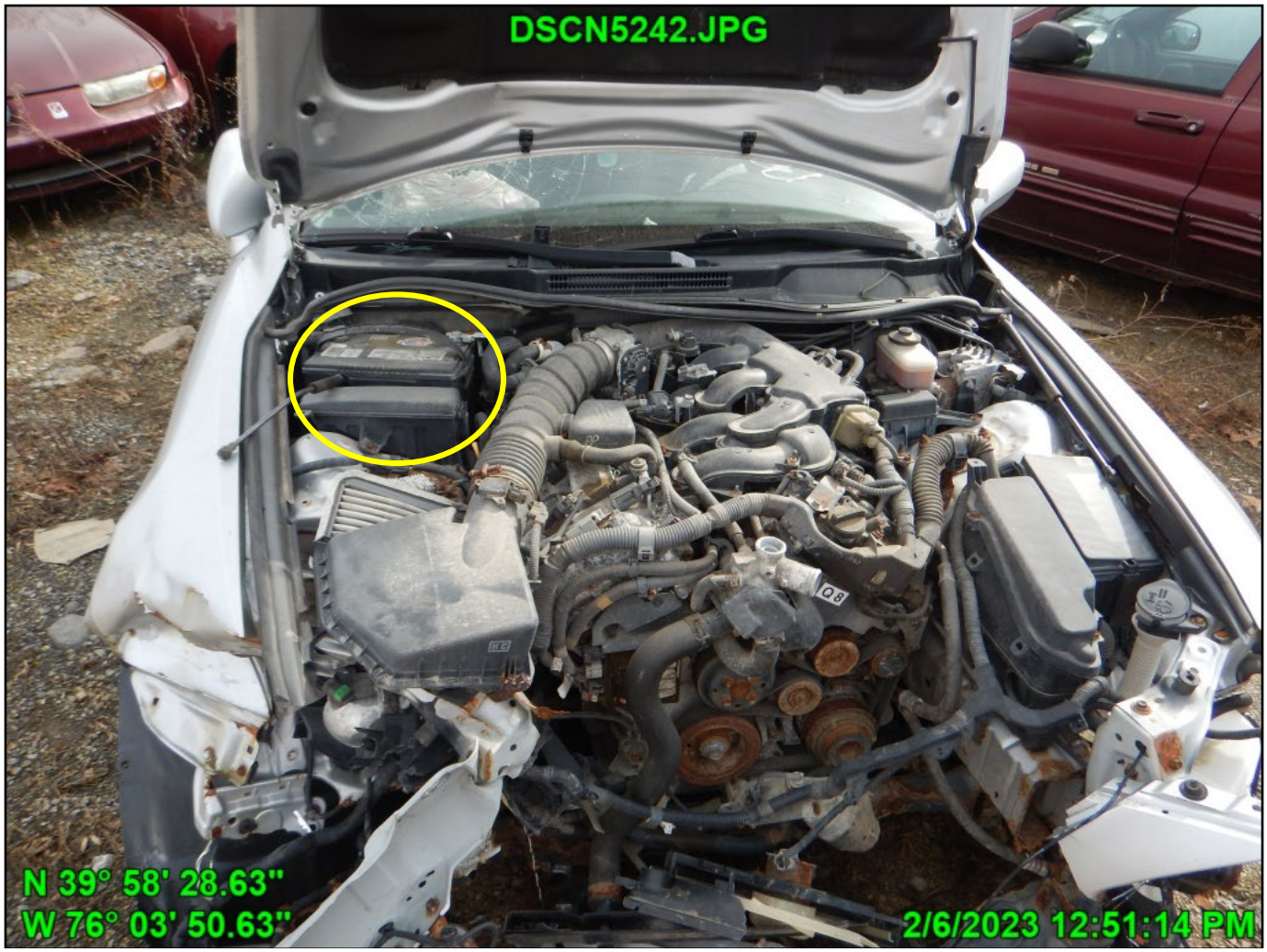


Description	View off property to an adjacent wooded area southwest of the Facility.

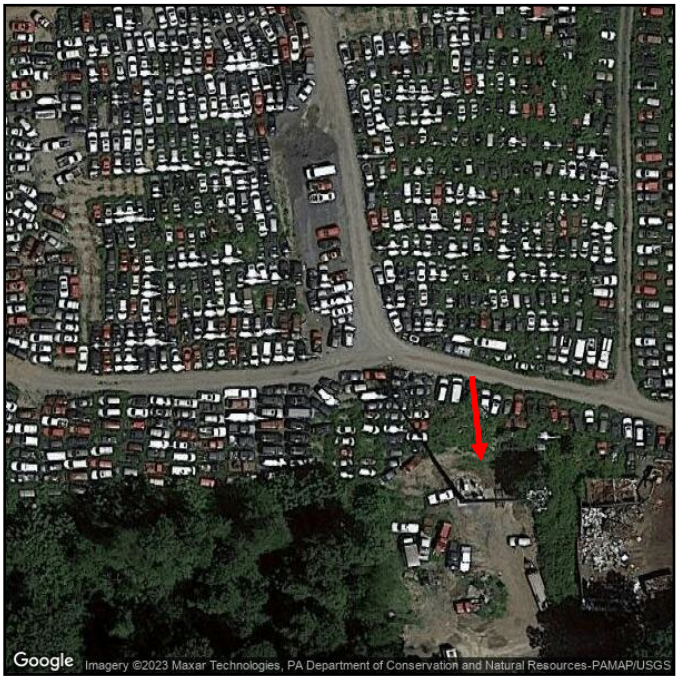


Description	View off property to an adjacent wooded area shown in Photograph DSCN5239.

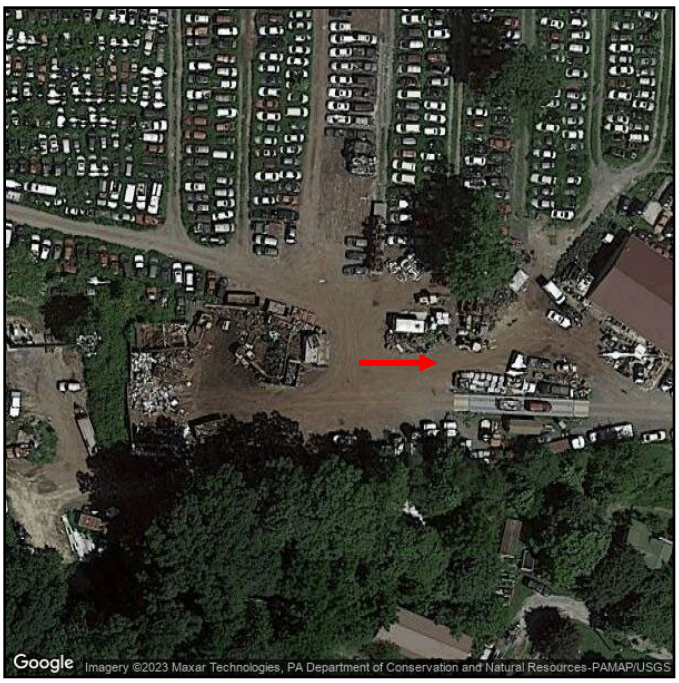
Description	View off property to an adjacent wooded area southwest of the Facility shown in Photograph DSCN5240.



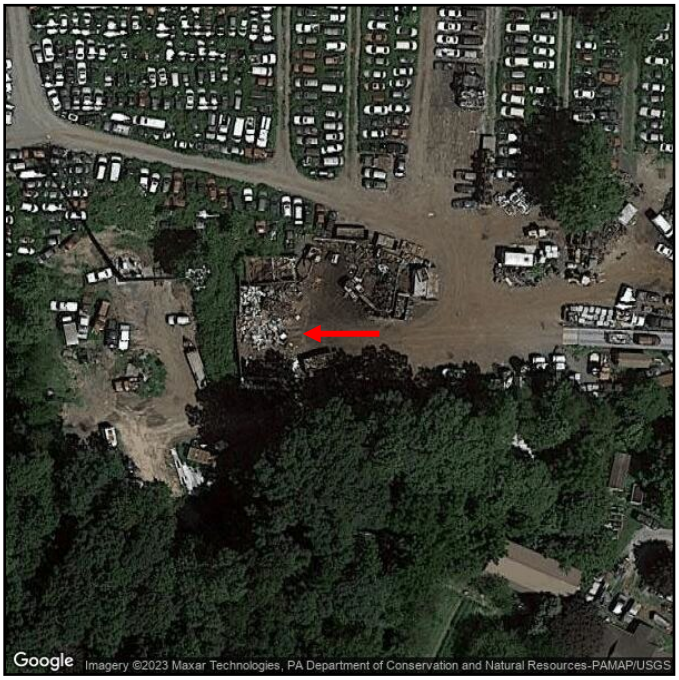
Description	Scrap vehicle stored in the south part of the Facility with the hood open and battery still inside.



Description	Upgradient view of pooled stormwater near the scrap metal storage area in the south part of the Facility.



Description	Spilled petroleum product on the compacted dirt road in the south part of the Facility.



Description	Scrap metal storage area in the south part of the Facility.

Description	Scrap metal storage area shown in Photograph DSCN5245.

Description	Scrap metal storage area shown in Photographs DSCN5245 and DSCN5246.