U.S. Environmental Protection Agency, Region 4
61 Forsyth Street SW, Atlanta, GA 30303

Water Compliance Inspection Report

FACILITY DATA

NPDES ID: ALG180791	**Effective Date:** 07/12/17	**Expiration Date:** 09/30/22
Facility Name: LKQ Birmingham		**SIC Code:** 5015
Address: 24559 State Highway 79 North, Trafford, Alabama 35172		

On-Site Representative(s), Title, Phone Number:	**Responsible Official, Title, Phone Number, Mailing Address:**
Dennis Antkowaik Plant Manager 205-296-0445 dmantkowiak@lkqcorp.com Brandon Walsh Environmental Compliance Manager 615-988-3371	Dennis Antkowiak LKQ Southeast, Inc 24559 Highway 79 North Trafford, Alabama 35172

INSPECTION ENTRY DATES/TIMES

Entry Date/Time: 11/10/20, 9:45 am	**Exit Date/Time:** 11/10/20, 1:00 pm

NAMES OF EPA AND STATE INSPECTORS

EPA: Ahmad Dromgoole, Mark Robertson
ADEM: Karl Ryan, Heather Byars

AREAS EVALUATED DURING INSPECTION *(Check those areas evaluated)*

	Permit		Self-Compliance Program		Pretreatment
	Records/ Records		Compliance Schedule		Pollution Prevention
X	Facility Site Review		Laboratory	X	Storm Water
	Effluent/ Receiving Waters		Operations & Maintenance		Combined Sewer Overflow
	Flow Measurement		Sludge Handling/ Disposal		Sanitary Sewer Overflow

INSPECTION NOTES

The inspection team arrived at the facility and met with Dennis Antkowiak, the Plant Manager; Brandon Walsh, the Environmental Compliance Manager; and Kip Brannon, the Environmental Manager. Upon arrival, the inspection team held the opening conference with facility personnel where they were provided the reason and scope of the inspection. The facility was selected for inspection as a continuation of EPA's ongoing investigation of LKQ facilities in different regions. The focus of the inspection would be facility's compliance with its NPDES permit. While the facility evaluation was performed during the site visit, the records review portion was performed offsite through a Section 308 Information Request to the facility.

EPA REPRESENTATIVES

Inspector Signature/Name	**Office/Phone Number**	**Date**
Dromgoole, Ahmad Digitally signed by Dromgoole, Ahmad Date: 2020.12.15 17:45:22 -05'00' Ahmad Dromgoole, Environmental Engineer	USEPA Region 4/ECAD-WEB-WWES 404-562-9212	
MARK ROBERTSON Digitally signed by MARK ROBERTSON Date: 2020.12.16 08:17:50 -05'00' Mark Robertson, Environmental Engineer	USEPA Region 4/ECAD-WEB- WWES 404-562-9639	
Management Signature/Name	**Office/Phone Number**	**Date**
DANIEL O'LONE Digitally signed by DANIEL O'LONE Date: 2020.12.16 12:36:01 -05'00' Dan O'Lone, Section Chief	USEPA Region 4/ECAD-WEB- WWES 404-562-9434	

1. FACILITY INFORMATION					
GPS Coordinates 33° 50' 26.53" -86° 39' 57.05"	**Previous & current General Permit, SIU, & Other Media Permit** The most recent NOI was submitted by the company in 2017 with reissuance of permit coverage occuring on 10/01/17. According to facility personnel, an updated NOI was submitted in 11/2020 but was neither available on the ADEM site nor provided in response to EPA's information request.				
Receiving Water(s), Wetlands, or MS4	**Site Acreage & % Impervious Area**			**Type of Ownership**	**No Exposure Exemption**
Dry Creek (according to NOI) Longs Branch (according to aerial review)	35 acres (according to 2017 NOI) ~130 acres (according to facility personnel after a 2018 expansion)			Corporate	N/A
SIC Code(s) Description (Primary & Secondary)	**Years in Operation**	**No. of Employees**	**Hours & Days of Operation**	**Discharge to 303(d) Listed or TMDL Waters**	**Weather Condition**
5015	2009			N/A	Cloud, 70s

FACILITY'S OPERATION & PRODUCT DESCRIPTION

LKQ Southeast operates an auto salvage facility in Trafford, Alabama. The facility utilizes approximately 106 acres of the 130 acre site. The cars received at the site are primarily received from auction and by the time they are received at the site they have been voided of potential leaking fluids. Once received at the site, cars are held in the holding area along the east side of the site along the road. From the holding area, cars are moved inside to the dismantling area. Here any remaining fluids in the vehicle are removed along with the drivetrain and other saleable parts of the vehicle (that are weather sensitive). The removed fluids are captured in pans and trays prior to being transferred to the liquid storage tanks outside of the building. Waste and scrap material removed during the dismantling process are disposed of in roll of dumpsters on site. Once the select parts from the car are removed, they are moved to the indoor warehouse/distribution building and the remains of the car are taken to the outdoor storage areas. According to facility personnel, cars typically remain on site for around 600 days before they are crushed and removed from the site. The portable crusher, operated by a contractor, is operated on site for a couple of months a year.

SECTION 2 - RECORD REVIEW			
Permit Requirement or Inspection Questions	**Permit Requirement Met**		
	YES	**NO**	**N/E**
Representative on-site? During the inspection, EPA and ADEM were met by Dennis Antkowiak, Brandon Walsh, and Kip Brannon.	X		
Submit a Notice of Intent (NOI) **Part II(A)(1)** The most recent NOI submitted by the company was from 2017. This NOI requested permit coverage for 35 acres, the northeast portion of the site. This NOI did not incorporate the area from the 2018 expansion (expanding the site to roughly 106 utilized acres), incorporate the three new outfalls identified in the 11/2020 BMP plan revision, or reflect the change in the stormwater flow paths likely resulting changes to what would be considered the representative outfall.		X	
Minimum of 3 years of monitoring and inspection records available on-site? **Part I(B)(4)(b)** Records pertaining to permitting requirements were requested back through October 2017. In response to this request, inspection records were provided back to October 2017. Starting in March 2018, the facility began performing bi-week stormwater inspections. Prior to March 2018, the facility appeared to perform monthly inspections. DMR monitoring records were provided from the second half of 2017 until the first half of 2020.	X		

Sampling/Monitoring Records Monitoring records were provided and reviewed back through November 2017. Included in these monitoring records were calibration records for the pH measures taken in the field with the collection of the sample.	X		
Facility inspection Records **Part IV(A)(4)(b)** Records of bi-weekly inspection were provided by the company. From the review of these records, the facility appeared to routinely evaluate potential areas of stormwater pollution at the site and document areas of concern.	X		
Records of corrective measures in response to inspections **Part IV(A)(4)(b)** During the inspection, facility personnel stated that they periodically clean out the catchment to Outfall 001 due to sediment accumulation. The inspection records provided by the company showed the following issues observed for elongated periods of time: the need for the closing of car hoods (Nov 2019-Feb 2020), the need for grading and stabilization (May 2019-to Feb 2020), and the need for the removing of tanks, radiators, and debris on the ground (Apr 2019-Aug 2019). These issues were noted in the inspections for periods greater than 30 days and no records of the corrective measures taken were provided.		X	
Records of spills and spill response **Part I(A)**			X

3. BEST MANAGEMENT PRACTICES (BMP) PLAN INFORMATION			
SWPPP TOPICS	**YES**	**NO**	**N/E**
BMP on-site (obtain a copy of the plan) **Part IV(A)(4)(a)** A copy of the facility's BMP plan was provided. The provided plan was originally issued 05/2016 and updated on 11/2019 and 11/2020.	X		
BMP Certification **Part IV(A)(1)(h)** A certification sheet was included with the facility's BMP plan with the signature of the plant manager from 11/10/20.	X		
BMP Modified or Update to Current Conditions **Part IV(A)(4)(d)** Although the site plan was updated in 11/2020, there were inconsistencies between what was identified in the NOI, BMP plan, and what was described by facility personnel during the inspection. Specifically, with the facility's recent upgrades, there was confusion as to which outfall was the discharge point for the stormwater runoff from the area around the shop and warehouse. During the inspection, it was stated that the storm drains from the area around the buildings no longer discharged to Outfall 001 (the representative outfall) but instead discharged to 002. According to the BMP plan, which was updated after the recent inspection, there were two outfalls on the north side of the site. One for the drainage from the area around the buildings and vehicle storage areas on the northeast side of the stream and a second from the vehicle storage area on the west side of the stream. During the inspection, an additional drainage feature was observed, seen in photos DSCN0054-DSCN0055, that was not identified in the facility's plan.		X	
Pollution Prevention Team Named in BMP **Part IV(A)(1)(e)** A table was provided in the site plan with the names, roles, responsibilities, and contact information for the members of the pollution prevention team members.	X		
Employee Training for Stormwater Requirements **Part IV(A)(4)(c)** The site plan includes a section about employee training which includes details on who will administer the training, the topics of the training, and the frequency of training. According to the plan, all employees will receive the initial training in addition to annual refresher training.	X		
Site Description **Part IV(A)(1)(g)** Section 3 of the BMP plan provides a description of the facility. This included a description of the operations at the site and the stormwater drainage system. According the BMP plan, Dry Creek is	X		

3. BEST MANAGEMENT PRACTICES (BMP) PLAN INFORMATION			
SWPPP TOPICS	**YES**	**NO**	**N/E**
identified as the nearest receiving water. A review of the aerial photography of the site shows the actual receiving water as Longs Branch.			
Site Map **Part IV(A)(1)(g)** A topographic map and a facility layout and drainage map were included with the site plan. Included on these maps were the stormwater flow paths, outfalls, and potential pollutant sources.	X		
Summary of Pollutant Sources **Part IV(A)(1)** Section 4 of the BMP plan provides a description of the various stormwater pollutant sources and their potential pollutants.	X		
Description of the Control Measures **Part IV(A)(1)** Section 5 of the BMP plan provides a description of the stormwater control measures implemented at the facility.	X		
Schedule and Procedures for Good Housekeeping Maintenance and Preventative Maintenance Measures **Part IV(A)(1)** Section 5 of the BMP plan provides a list and description of the housekeeping and preventative maintenance measures.	X		
Spill Prevention & Control Countermeasures **Part I(A)(1) and IV(A)(1)(b)** Section 5 of the BMP plan includes a summary of the spill prevention and response requirements. Additionally, it incorporates the facility's SPCC by reference which includes inspection frequencies and recordkeeping requirements for the ASTs at the facility.	X		
Erosion and Sediment Controls and Management of Runoff Section 5 of the BMP plan included details of the sediment and erosion controls to be implemented at the site.	X		
Schedule and Procedures for Monitoring Section 6 of the BMP plan provides details of the procedures for performing and documenting site monitoring. Included in this section are requirements for sample collection, submission of annual certification DMRs, and reporting of exceedances. According to the BMP plan, the facility was to perform period monitoring on Outfalls 001, 002, and 005. This appeared to have been a recent change with facility personnel stating during the inspection that they only monitor Outfall 001 as the representative outfall.	X		
Description of BMPs specific to the stream impairments (TSS) **Part IV(C)**			X
Schedule and Procedures for Inspections **Parts I(A)(2), IV(A)(1)(f), IV(A)(4)(b)** Section 6 of the BMP plan provides the frequency and requirements for on site inspections. According the facility's BMP plan, biweekly inspections are to be performed at potential pollutant sources and control measures. These inspections should be documented and findings requiring a BMP plan revision should be implemented and incorporated in the plan within 30 days.	X		

4. SITE EVALUATION	
Pollutant Sources	**Note location, quantitative description, design issue, O&M deficiencies (including the nature and extent), potential pollutant, and pollutants off-site.**
Loading/Unloading Operations	Cars received at the facility are held in the temporary storage area along the east side of the facility (see photos DSCN0034-DSCN0035) prior to dismantling. According to facility personnel, cars in the holding area can be stored for up to 90 days prior to being dismantled. With the vehicles received at the facility coming from auction, potential fluid leaks would have already occurred and therefore are not a common problem for this site. Shipments from the site are handled out of the parts warehouse. Delivery trucks are loaded at the loading bays along the side of the building (see photo DSCN006).

Outdoor Storage Facilities	Once vehicles go through the dismantling shop and had the appropriate parts removed, the outer shell of the vehicle is stored outdoors in the longterm storage areas. Long term vehicle storage utilizes most of the area at the site and is permeable gravel. In 2016 and 2018, the facility had two expansions (into the area on the west side of the stream and the southern half of the area on the east side of the stream). Portions of this area can be seen in photos DSNC0040-DSCN0041, DSCN0046-DSCN0050, DSCN0053, DSCN0055, DSCN0047, and DSCN0061. Although most of the scrap parts were co-located with the salvaged vehicles, some loose parts were observed scattered in the yard (see photos DSCN0036 and DSCN0038).
Outdoor Manufacturing/ Processing Operations	All the disassembling of automobiles occurs inside of the shop (see photo DSCN0030). The only process operation occuring outdoors is the final crushing of automobiles. These vehicles, which have been deemed to no longer have sufficient value, have already been voided of fluids and would have likely been onsite for approximately 600 days. The mobile crusher, operated by a contractor, can be seen in photos DSCN0039-DSCN0040. Crushing operations occur in the gravel long term storage areas of the site.
Waste Treatment/Storage/ Disposal Areas	Once vehicles are dismantled in the shop, saleable parts are moved to the indoor storage building, vehicle bodies are moved to the longterm outdoor storage area, and scrap/unusable parts are disposed of in roll off dumpsters. These dumpsters, seen in photo DSCN0033, were staged near the dismantling building and were used for both metal and non-metal waste. According to facility personnel, tarps are maintained on dumpsters when not in use and they are picked up weekly.
Liquid Storage Tanks	In the dismantling shop, vehicles are drained of any remaining fluids. These fluids are collected in trays and pans and transferred to the outdoor storage tanks (see photo DSCN0032). The storage tanks are located inside of a secondary containment structure with shed cover. No drainage plugs were installed on the containment structure. According to facility personnel, accumulated fluids are manually pumped out and disposed of offsite.
Fueling Stations/Equipment Maintenance Areas & Cleaning Areas	A few of the tanks used for recovering fluids from vehicles during the dismantling process are used for storing gasoline and diesel. The recovered fuel from the dismantling process is then used to fuel onsite equipment. These fuel storage tanks are equipped with fueling equipment which is also housed inside of the secondary containment structure.
Management of Run-off Controls (storage areas, diversion ditches, dumpsters, secondary containment, & etc.)	Stormwater runoff at the site is primarily routed to one of the facility's outfalls. Most of the area at the site is gravel except for the area around the dismantling shop and parts building. This area is paved and has storm drain inlets (seen in photo DSCN0031) which direct stormwater towards one of the facility outfalls. The storm drains direct water to a junction area, seen in photo DSCN0034, where it is combined with sheet flow from the initial vehicle receiving and holding area prior to it being directed to the outfall. According to facility personnel, this junction area is an area of sediment build up and requires periodic cleanouts. An additional drainage feature was observed during the inspection along the north side of the site running east/west from the area around the warehouse to the adjacent stream. This drainage feature was not incorporated in the facility's BMP plan. The drainage feature, seen in photos DSCN0054-DSCN0055, was observed with some stone in place to reduce erosion. Rip rap was observed throughout the site in the vehicle storage areas. With the facility's recent expansions, the vehicle storage area was extended south along Longs Branch. In several areas along the tributary, the facility was seen to have expanded right up to the bank of the tributary (see photos DSCN0045-DSCN0046 and DSCN0061). In several of these areas along the west side of the facility near the tributary, erosion features had formed leading towards the tributary (see photos DSCN0045 and DSCN0047-DSCN0049, DSCN0052-DSCN0053, and DSCN0059). These areas appeared to be in need of either additional stabilization measures, controls to divert concentrated flow towards an identified outfall, or be modified to include a permitted outfall.

Spills/Leaks Handing	All dismantling operations are performed inside of the shop; therefore, potential spills from the dismantling process can be contained to the building. Although there is the potential for leaks from cars received at the site, it is uncommon according to facility personnel. Spill kits are maintained in various areas of the site to address this. The periodic crushing operations at the site have a minimal potential for spill due to the fluids having already been drained from the vehicle. There is the potential for leaks from the crushing equipment and therefore a spill kit is maintained at the crusher location (see photo DSCN0040).

5. OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS	
Number Potential Stormwater Discharge Points/Outfall(s) to Receiving Water or MS4	According to the facility's 2017 NOI, there were three outfall locations, 6 outfall IDs, at the site: DSN001-1/DSN008-1, DSN001-2/DSN008-2, and DSN001-3/DSN008-3 (3 salvage yard IDs and 3 uncontaminated SW from fuel and petroleum storage IDs). These outfall locations were all found on the northern end of the site. With the recent expansions at the site, several changes had been made to the configuration of these outfalls with Outfall 3 appearing to no longer be in existence. According to the 2017 NOI, Outfall 1 was considered the representative outfall for the site with it receiving runoff from the vehicle storage area and the area around the processing and dismantling buildings. According to facility personnel, the flows directed to Outfalls 1 and 2 had changed with Outfall 1 now receiving discharge from the roof drains and Outfall 2 receiving flow from the area around the dismantling shop (from storm drain inlets). Observation of the area around the original location for Outfall 3, as seen in photos DSCN0050-DSCN0051, showed the outfall no longer in place. With the expansion in 2018, the site more than doubled in size with the addition of the property on the southern end. With the additional acreage, additional outfalls were needed for the site. These additional outfalls were incorporated into the site plan with the 11/13/20 revision. Outfall 03 was removed from the northern end of the property and reestablished on the southern end of the property (believed to be around the area of photo DSCN0041). Two additional outfalls along the south side of the site, Outfall 04 and 05, were also incorporated into the facility's revised BMP plan (seen in photos DSCN0042-DSCN0043). In addition to the recently added outfalls in the BMP plan, potential unidentified discharge points were identified during the inspections near Longs Branch. The discharge points can be seen in photos DSCN0045, DSCN0047-DSCN0049, DSCN0052-DSCN0053, and DSCN0059.
Evidence of Off-site Accumulation of Pollutants Observed in Receiving Water & MS4	The receiving water along the west side of the site can be seen in photos DSCN0044-DSCN0046. Although a sediment plume was not observed at the time of the inspection, due to it not being a rain event, several erosion features were observed in the area of the site adjacent to the stream (see photos DSCN45 and DSCN0047-DSCN0049).
Non-stormwater Discharge Off-Site Observed	No non-stormwater discharges were observed during the inspection.

Exit Conference:

An exit conference was held with Dennis Antkowiak, Brandon Walsh, and Kip Brannon where the following observation were made:

- The NOI and BMP plan should be updated to reflect the accurate site acreage and immediate receiving water
- Several areas along the west side of the site were observed with gullies and erosion features
- There were inconsistencies observed between the outfalls identified in the permit and what was identified at the site. This included the location of outfalls, the number of outfalls, and the drainage areas to the outfalls.
- Outfalls at the facility need to be properly constructed and stabilized.