



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

Drafted Date: September 10, 2022
Finalized Date: *Dated as shown on electronic signature*

Subj: Inspection Report
Clean Water Act - National Pollutant Discharge Elimination
System ("NPDES")
All Foreign Auto Salvage, Incorporated

From: Alex Rosenberg, Inspector

Thru: **Denny Dart**

To: File

I. Facility Information

- A. *Facility Name:* All Foreign Auto Salvage, Incorporated
- B. *Facility Location:* 300 Thatcher St
East Bridgewater, MA 02333
- C. *Facility Contacts:* John Ferri, Business Owner
(508) 587-0222, allforema@aol.com
- D. *NPDES ID No(s):* 3601255634

II. Background Information

- A. *Date(s) of inspection:* August 23, 2022
- B. *Weather Conditions:* Overcast/sunny, forecasted rain. No precipitation during the time of inspection. Approximately 80 °F.
- C. *US EPA Representative(s):*
Alex Rosenberg, Damian Bednarz
- D. *State/Local Representative(s):*
None
- E. *Federally Enforceable Requirements Covered During the Inspection:*
National Pollutant Discharge Elimination system, Multi-Sector General Permit (MSGP) 2021

F. Previous Enforcement Actions:
None known

III. Type and Purpose of Inspection

U.S. Environmental Protection Agency (“EPA”), Alex Rosenberg and Damian Bednarz (“inspection team”) conducted an unannounced inspection under EPA’s National Pollutant Discharge Elimination System (“NPDES”) 2021 Multi-Sector General Permit (“MSGP”) for stormwater discharges associated with industrial activities at All Foreign Auto Salvage (the “Facility” or the “Site”).

IV. Facility Description

The Facility sits at the base of a capped landfill to its direct West. Beaver Brook is located to the East of Thatcher Street, on the opposite side of the street as the Facility. The driveway leading to the store-front has used-vehicles intended for sale.

Approximately 8 vehicles are outside of the Facility’s fenced area, along an access route to the neighboring property to the west.

V. Inspection

The inspection team arrived at the Facility at approximately 10:35 AM and entered the store front (slide 3). No representative was present until 10:50 AM when John Ferri, the Facility owner, met with the inspection team in the parking lot.

A. Opening Conference

The inspection team presented their credentials and explained the purpose of the inspection. The Facility is not covered under the 2021 MSGP and therefore needed an assessment to determine Site-specific stormwater coverage applicability. Mr. Ferri claims there is no discharge or runoff from his Facility and the Facility is therefore exempt from NPDES permitting. He stated that there had been a professional engineering assessment conducted that confirms this assertion and conclusion.

The Facility, an automotive repair and sales shop, was purchased in 1985 by the current owner. The property is approximately 2 acres and has approximately 200 vehicles on-site. The Facility is open 6 days a week and has one employee aside from the owner.

B. Facility Tour

The walkaround began at the place of the opening conference, the store front. About 20 cars are parked beside the street (slides 11-12). Mr. Ferri claims all vehicles in this area are for sale and are in running condition. The cars out front often fluctuate and are replaced.

The Inspection Team continued walking west, through the Facility's front gate (slide 8). Piles of scrap metal and various automotive parts were observed on the south side of the access road (slides 13-14, 16-19). Vehicles are organized in rows with spacing of approximately 1-foot between each line of cars (slide 20).

According to Mr. Ferri, all vehicles in the yard have been drained and are stored for parts. Engine cavities are covered by car hoods.

Behind the storefront is a rack where tires are stored and stacked (slide 21).

The perimeter of the property is fenced with dense foliage behind it to the north, west and south. Photos were taken of the perimeter from the Northeast side of the Facility to the Southwest (slides 22-30). Ground elevations outside the Facility's fence appeared to be higher (creating a berm).

A more distinctive berm is present along the Northeastern perimeter closest to the road (slide 37). Outside of the berm in this area is a culvert that runs east beneath Thatcher Street (slides 36-40).

All vehicles are drained for liquids inside the garage (slide 31). At the time of the inspection the Facility was in process of completing an engine repair. Inside the garage is a 50-gallon oil barrel outfitted with a funnel to collect drained oil (slide 32). Various automotive parts and tools are stored inside (slide 34).

C. Records Review

Because the Facility is not permitted by EPA, there were no records to review.

The owner produced an engineering report dated April 22, 2014 by a third party consultant (RELCO Engineering) that assessed stormwater runoff potential from the Facility. The conclusion of the consultant was the Facility does not discharge to neighboring waters of the United States.

D. Closing Conference

The Inspection Team departed at approximately 11:30AM. EPA inspector Alex Rosenberg suggested a couple changes to be made to the site to ensure potential discharges are avoided.

- Vehicles parked near the culvert (outside the fenced laydown yard), should be moved into the main bermed laydown area (slide 41-42).
- Oil storage containers that have not been in use for many years should be disposed of (slide 14).

Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the

inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.