

UNPERMITTED INDUSTRIAL FACILITY STORMWATER INSPECTION CHECKLIST

Inspection Date	February 27, 2024	
Time	Entry: 1:25 PM	Exit: 2:20 PM
Weather Conditions	70s and sunny	
Media/Program	Water – CWA § 301, 402 – Industrial SW/NEC	
Operator Name:	E G Used Truck Parts	
Facility or Site Name:	E G Used Truck Parts	
Permit ID or Tracking #:	Unpermitted at the time of the inspection	
SIC Code:	Unknown by facility representatives	
Facility Address:	12871 Alexandria Drive	
(city, state, zip code)	Opa Locka, FL 33054	
Geographic Coordinates:	25.891428°, -80.254067°	
Mailing address:	12871 Alexandria Drive	
(city, state, zip code)	Opa Locka, FL 33054	
County:	Miami-Dade	
Regular Days/Hours of Operation:	8:00 AM – 4:30 PM (M – F); 8:00 AM – 12:00 PM (Sat); Closed (Sun)	
# of Employees at location:	10	
Size of Facility (in acres):	Approximately 1.5 acres in total with approximately 1 acre of outdoor industrial activity	
Receiving Water(s):	NW 127 th Street Canal, approximately 700' south of the facility	
Date facility est. @ location:	Approximately 10 years	
Onsite Representatives:		
Name: Esauly Ruane	Title: Co-owner	Phone: 305-297-7993
	Email: esauly1999@gmail.com	
Authorized Official:	→	Contacted? ☒ Yes ☐ No
Name: Esauly Ruane	Title: Co-owner	Phone: 305-297-7993
	Email:	
Additional Personnel Participating in Inspection:		
Name: Esau Ruane	Title: Co-owner	
Inspector(s):	Title:	Company:
Kate Forsmark	Lead Inspector	Eastern Research Group, Inc.
Kelsey Guy	Inspector	Eastern Research Group, Inc.
Rachel Olugbemi	Inspector	Environmental Protection Agency, Headquarters
Jeremy Judd	Inspector	Environmental Protection Agency, Region 4
Inspection Report Author:		
Name: Kate Forsmark	Signature: 	Date: May 21, 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 February 27, 2024, a U.S. Environmental Protection Agency (EPA) contractor, Eastern Research Group, Inc. (ERG), conducted an industrial stormwater nonfiler inspection at E G Used Truck Parts located in Opa Locka, Florida (facility). Rachel Olugbemi of EPA Headquarters, Jeremy Judd of EPA Region 4, and Kate Forsmark and Kelsey Guy of ERG (collectively, EPA Inspection Team) met with the facility representative, Esaully Ruane. 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.

The weather at the time of the inspection was sunny and approximately 75°F. According to precipitation data from the National Oceanic and Atmospheric Administration (NOAA)¹, the Opa Locka, Florida area received no rain the day of or the day prior to the inspection.

- 2) Credentials presented to: Esaully Ruane
- 3) Facility acknowledged receiving previous outreach materials or correspondence on Permit requirements?
☐ Yes ☒ No Describe: N/A
- 4) Facility has been individually notified by permit authority or EPA that it is subject to stormwater requirements?
☐ Yes ☒ No Describe: The facility has a solid waste annual operating permit (IW5-000479-2023/2024) from Miami-Dade County's Department of Regulatory and Economic Resources' Division of Environmental Management (DERM). DERM conducted an inspection of the facility in 2023, focused on oil storage and spill management.

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, etc.).

The facility purchases used buses, 18-wheelers, and garbage trucks to dismantle into individual parts to sell. When vehicles arrive at the Facility, fluids (i.e., oil, coolant, antifreeze) are drained, engines and transmissions are removed, and the bodies of the vehicles are cut up to be sold for scrap. Some of the engines are dismantled and sold for parts and some are sold whole. The facility representative stated that parts will sit for one month on average, approximately three months maximum, and if they are not sold then they sell them for scrap. In addition to the engine parts, the facility sells tires and batteries from dismantled vehicles. The facility sells parts to both public and commercial sources, as well as internationally.

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

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 receives vehicles and uses forklifts to offload them at the facility for dismantling. The facility also loads parts they sell using forklifts. Loading and unloading takes place near the facility's entrance in an uncovered area.
Industrial Manufacturing/Processing Operations	The facility dismantles used vehicles (buses, 18-wheelers, and garbage trucks) for parts. The trucks are drained of fluids and reusable parts (i.e., engines, transmissions, tires, batteries) are removed to be sold. The Facility uses a covered, dedicated area in the southwest portion of the facility to drain fluids from vehicles and remove parts (refer to Appendix B, Photograph 7). Once all parts are removed, the bodies of the trucks are sold for scrap.
Industrial Machinery & Equipment Storage	The facility has ten forklifts stored throughout the yard and under the outside shelter. The forklifts run on propane.
Storage of Industrial Materials or Products	The facility stores vehicle parts throughout the yard without cover and exposed to stormwater (refer to Appendix B, Photographs 2, 4, 5, 6, and 8).

All photos taken by Kelsey Guy, ERG, unless otherwise noted

Liquid Storage (e.g., Tanks, Liquid Storage Drums)	The facility stores engine and hydraulic oil drained from vehicles in poly totes. The EPA Inspection Team observed one of the totes with secondary containment and two without secondary containment (refer to <u>Appendix B, Photographs 7 and 9</u>). The facility representatives stated that coolant and antifreeze from vehicles is stored in 55-gallon drums.
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)	One portable toilet was observed at the facility near the entrance (refer to <u>Appendix B, Photograph 9</u>).
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 they utilize a third party to come and fuel their forklifts onsite.
Sediment & Erosion Controls	The ground surface throughout the facility was fully paved.
Spills/Leaks Handling	The facility has absorbent material for spills; however, the ground surface throughout the facility was stained with oil (refer to <u>Appendix B, Photographs 2, 4, 5, 6, 7, and 8</u>).
Outside Shelters	☐ Temporary (Date Established _____) ☒ Permanent The southern portion of the facility has an outside shelter that the facility representative stated is used to dismantle vehicles and store parts and fluids (refer to <u>Appendix B, Photographs 7 and 8</u>).
Evidence of non-stormwater sources/discharges (allowable if permitted under MSGP)?	Evidence of non-stormwater sources/discharges was not observed.
Evidence of process wastewater sources/discharges?	Evidence of process wastewater sources/discharges was not observed during the inspection.

OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS	
Number and description of each potential Stormwater Discharge Point from the Facility	The facility representatives stated that when it rains stormwater generally pools in the center. However, during heavy rains, the facility representatives stated that stormwater flows west through the facility entrance (refer to Photograph 10). The facility's northern, eastern, and western perimeters are enclosed with concrete block walls except for the entrance on the west of the facility. The southern perimeter contains a chain link fence and is graded towards the neighboring facility.
Evidence of pollutants migrating offsite (stains, deposits, ponding) at discharge points, into Receiving Waters or in MS4	The EPA Inspection Team observed the facility's entrance/exit onto Alexandria Drive to have oil staining leading from the facility to the public roadway (refer to Appendix B, Photograph 1). The receiving water, the NW 127th Street Canal, is approximately 600' south of the facility's entrance. The EPA Inspection Team observed visual evidence of oil and grease in water pooled on the north side of the NW 127th Street Canal (refer to Photograph 14).
Evidence of Non-stormwater Discharges leaving site (authorized or unauthorized)	Evidence of non-stormwater discharges leaving the site was not observed during the inspection.
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's northern, eastern, and western perimeters are enclosed in concrete block walls. The southern perimeter consists of a chain link fence allowing potential for stormwater to flow onto the neighboring facility to the south. The northern portion of the facility is slightly graded from north to south, towards the central portion of the facility. The central portion of the facility is graded west towards Alexandria Drive. During heavy rain, the facility representatives stated that the water flows west through the facility entrance to Alexandria Drive (refer to <u>Appendix B, Photograph 5</u>). Alexandria Drive was graded towards the NW 127th Street Canal (refer to <u>Appendix B, Photographs 10 through 15</u>).

SECTION III – AREAS OF CONCERN

- 1) The EPA Inspection Team observed the facility storing and transporting wrecked and dismantled vehicles and vehicle parts. These activities are included in the description of SIC Code 5015 – Motor Vehicle Parts, Used. Businesses classified under SIC Code 5015 are regulated under 40 C.F.R. § 122.26 for stormwater discharges associated with industrial activity.

All photos taken by Kelsey Guy, ERG, unless otherwise noted

- 2) The EPA Inspection Team observed that the ground surface throughout the facility was stained in oil (refer to Appendix B, Photographs 2, 4, 5, 6, 7, and 8).
- 3) The EPA Inspection Team observed that the facility was graded towards Alexandria Drive, which is graded south towards the NW 127th Street Canal. The facility representatives stated that when it rains, stormwater would flow through the facility's entrance to Alexandria Drive (refer to Appendix B, Photographs 5 and 10 through 15).

SECTION IV – LIST OF APPENDICES

Appendix A – Aerial Location

Appendix B – Photograph Log