



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
5 Post Office Square
Boston, MA 02109

Sent via Electronic Mail (*Dated as shown on electronic signature*)

Mr. Paul Bachand, President
P&T Enterprises, Inc. d/b/a Westover Auto Salvage
147 Bay Road
Belchertown, MA 01007
katieparted@aol.com

Subject: March 17, 2023, EPA Inspection of P&T Enterprises, Inc. d/b/a Westover Auto Salvage

Dear Mr. Bachand,

On March 17, 2023, the U.S. Environmental Protection Agency ("EPA") performed an inspection at Westover Auto Salvage, located at 147 Bay Road, Belchertown, MA ("the Facility" or "site"), regarding compliance with the National Pollutant Discharge Elimination System ("NPDES") program of the Clean Water Act ("CWA" or the "Act"). A copy of the inspection report is included as an attachment to this letter along with a photo album.

During the inspection, EPA observed stormwater discharging from points through the berm which the Facility stated had been established to prevent stormwater exiting the site. Due to the inspectors' observations of stormwater discharge associated with industrial activities at the Facility, provide a response confirming and proving that Westover Auto Salvage has completed one of the two actions outlined below. Communicate your decision as to which action the Facility has taken and proof of that action in an electronic format to Damian Bednarz of my staff at bednarz.damian@epa.gov.

1. The industrial activities taking place at the Facility are classified under the Standard Industrial Classification ("SIC") code 5093 (Scrap and Waste Materials) which is an applicable code under the Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity ("MSGP") Subpart N—Sector N—Scrap Recycling and Waste Recycling Facilities. This means that, as currently configured, stormwater discharges from the Facility are not authorized unless and until the Facility obtains coverage under the MSGP.
 - a. **Withing 30 days of receipt of this letter** submit an estimate of the date by which you expect the Facility will submit a Notice of Intent ("NOI") to discharge under the MSGP. The NOI must be submitted via the Central Data Exchange ("CDX"). General information on e-reporting can be found here <https://www.epa.gov/npdes/stormwater-discharges-industrial-activities-ereporting#accessingmsgp>. Steps include:
 - i. Sign-up for an account on CDX – see attachment (#1), and can also can be found here <https://cdx.epa.gov/about/userguide>.

- ii. Add Net-MSGP program service within CDX – see attachment (#2).
- iii. Submit an NOI – see attachment (#3); and
- iv. Add NeTDMR account for monitoring data submission – see attachment (#4).

Upon submission of your Facility's NOI, notify Mr. Bednarz by email, indicating the date of such submission.

- b. **Within 60 days of receiving this letter**, submit a copy of the facility's Stormwater Pollution Prevention Plan ("SWPPP"). A SWPPP template can be found on the national MSGP website¹.
2. Facilities that do not discharge stormwater associated with industrial activities do not require coverage under the MSGP.
- a. **Within 30 days of receipt of this letter**, provide evidence that the berm has been fully repaired and contains all stormwater originating from within the industrial footprint of the site, or a work plan and implementation schedule for these repairs. You must ensure that the berm is repaired in all areas potentially impacted by industrial activities of Westover Auto Salvage. This includes all areas where the company stores cars, even on those portions of the Belchertown Salvage site.
 - b. **Within 30 days of receipt of this letter**, provide evidence that the pipes observed on the downstream side of the Facility (Slide 66, 67) have been permanently sealed or explain how you have concluded that they cannot act as a conveyance of stormwater.

You may refer any questions related to technical issues in this letter to Damian Bednarz of my staff at 617-918-1482 or bednarz.damian@epa.gov. Legal issues may be directed to Sam Horowitz, Enforcement Counsel, at (617) 918-1512 or horowitz.samuel@epa.gov.

Sincerely,
Todd Borci, Manager
Enforcement and Compliance Assurance Division

TODD BORCI

Digitally signed by TODD
BORCI
Date: 2023.05.15 17:05:20
-04'00'

Enclosures:
Westover Inspection Report and Photo Album

¹ <https://www.epa.gov/npdes/stormwater-discharges-industrial-activities-fact-sheets-and-guidance#guidance>

Attachment #1 - Step 1 CDX_Quick_User_Guide.pdf
Attachment #2 - Step 2 How_to_Add_NeT-MSGP_Program_Service.pdf
Attachment #3 - Step 3 NOI_MSGP_2021.pptx
Attachment #4 - Step 4 Creating_New_Account_NetDMR.pptx

CCs (electronic only):

Susannah King, MA DEP

Matthew Sokop, MA DEP

Sam Horowitz, Enforcement Counsel, US EPA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

Date: *Dated as shown on electronic signature(s)*

Subj: Inspection Report
Clean Water Act - National Pollutant Discharge Elimination
System ("NPDES")
Westover Auto Salvage

From: Damian Bednarz, Inspector
Jeremy Rolfe, ECAD Intern
**DAMIAN
BEDNARZ**

 Digitally signed by DAMIAN
BEDNARZ
Date: 2023.05.16 10:22:25 -04'00'

Thru: Alex Rosenberg, Senior Inspector

To: File

I. Facility Information

- A. *Facility Name:* P&T Enterprises, Inc. d/b/a Westover Auto Salvage
- B. *Facility Location:* 147 Bay Road
Belchertown, MA 01007
- C. *Facility Contacts:* Paul Bachand, President of Westover Auto Salvage
(413) 323-4210
- D. *NPDES ID No(s):* N/A

II. Background Information

- A. *Date of inspection:* March 17, 2023
- B. *Weather Conditions:* Cloudy, cold, 45°
- C. *US EPA Representatives:*
Damian Bednarz, Jeremy Rolfe ("Inspection Team" or "inspectors")
- D. *State/Local Representative(s):*
NA
- E. *Federally Enforceable Requirements Covered During the Inspection:*
40 C.F.R § 122.26 – National Pollutant Discharge Elimination System
("NPDES") regulation for the discharge of stormwater

F. Previous Enforcement Actions:

On April 11, 2022, EPA Enforcement and Compliance Assurance Division (“ECAD”) sent a request for information (“308”) pursuant to the Clean Water Act (“CWA”) addressed to Mr. Paul Bachand at P & T Enterprises, Inc. DBA Westover Auto Salvage (“Westover Auto”). The 308 asked questions about general business and ownership information, the nature of facility operations and industrial activities, and oil pollution regulations. In its response, Westover Auto stated that there is no stormwater runoff from the site, and therefore a stormwater permit is not needed.

III. Type and Purpose of Inspection

Regarding the above information received in 308 responses from both Westover Auto and Belchertown Salvage Co. Inc., EPA concluded that an inspection evaluation was needed to determine the site’s applicability regarding the 2021 Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (“MSGP”).

IV. Facility Description

Westover Auto is a salvage operation at 147 Bay Road in Belchertown, MA (the “Facility” or “site”). Previous correspondence with the property owner of the adjoining property to the south, Mr. Tolpa, located at 153 Bay Rd (Bay Road Rear) in Belchertown, MA, indicated that Mr. Bachand leases part of Mr. Tolpa’s land parcel (referred to hereinafter as “Belchertown Salvage,”) to store processed vehicles. Belchertown Salvage was the previous operating name for industrial activities on this property.

The body of water running adjacent to these two properties is Batchelor Brook, which directly abuts both Westover Auto and Belchertown Salvage. Wetlands located immediately beside both properties are directly connected with the Brook via various flow paths. At the time of inspection, inspectors observed these flow paths to be flowing southwest, parallel to the westernmost property boundaries.

Batchelor Brook flows 2.6 miles southwest into Forge Pond, before continuing another 7 miles west into the Connecticut River. These aforementioned water bodies are all waters of the U.S., with the Connecticut River holding a Class B (“fishable and swimmable”) classification.

V. Inspection

Mr. Rolfe announced the inspection to the Facility on March 13, 2023, via phone call.

A. Opening Conference

The Inspector Team presented their credentials to Facility representatives, provided a copy of the Small Business Resources Information Sheet, and explained the purpose of the inspection was to verify the information the Facility provided in response to EPA’s April 11, 2022 308.

The Inspection Team arrived at 147 Bay Road, Belchertown MA at approximately 10:40 AM, parking in front of the main Westover Auto Salvage office building. Mr. Bachand was at the front desk and, after introductions, invited the inspectors to a separate office.

The inspectors explained general information regarding the MSGP. Mr. Bachand admitted he was not well-informed as to the particulars of the MSGP, but stated that he felt his business performed adequate best management practices so that stormwater pollution was negligible.

Mr. Bachard stated that Westover Auto was founded in 1996 and that the main office building was built in 2000. This building contains an office section for customer order handling and inventory, and two garage bays for vehicle processing and equipment and parts storage. Other warehouses and buildings were more recent additions to the site (2020 and newer). The western, larger warehouse contains a pressure wash area, water reclamation system, and multiple bays for vehicle processing. The smaller warehouse is primarily used for the storage of oil, engine blocks, and other vehicle parts. The Westover site is 9.4 acres in size and has 18 full time employees, operating Monday to Friday 8 AM to 5 PM and Saturday until 1 PM. This is the only location of Westover Auto's operation.

The inspectors asked Mr. Bachand for details about a 2800-gallon oil delivery truck which Mr. Bachand stated is used to store and relocate oil on site. Mr. Bachand further explained this oil truck is parked in the yard and is routinely parked overnight inside a heated warehouse when conditions are cold. Mr. Bachand also explained that there are several large "totes" of oil that are used around the site that are filled and emptied regularly as part of general movement of oil.

Mr. Bachand informed inspectors that most oil on the site is not disposed of off-site. Mr. Bachand stated that Town of Belchertown does not take waste oil, so some excess oil is delivered to other businesses. Mr. Bachand stated that Westover uses large-scale oil burning/heating systems that utilizes the majority of waste oil from operations to heat both the air and floor of all the buildings on site. There are four (4) such systems at Westover Auto for all its buildings.

The Inspection Team asked Mr. Bachand to describe the nature of activity at the site. Mr. Bachand explained the typical process for any given vehicle as follows: a junk vehicle is brought to the site; employees check for any leaks; the vehicle is put into a separate storage row awaiting processing; the vehicle is inventoried to identify salvageable parts; the vehicle is processed (all fluids, profitable parts, and the engine components are removed); parts are pressure washed and cataloged (slides 16, 17); and finally, the dry vehicle is stored in the yard. Mr. Bachand said that the draining and processing are done inside a large warehouse building.

Mr. Bachand explained that parts washing is done indoors and uses a water reclamation system. He also stated that the total number of cars on the site is 800 to 900 on any given day. There is a car crusher as well, set on a concrete slab and covered by a roof. Mr. Bachand explained that the cars are dry when they go into the crusher.

When inspectors asked about an oil-water separator system, Mr. Bachand explained that this is required by Belchertown regulators and that it is built into his water reclamation system. Mr. Bachand stated that Westover is not connected to the town sewer, and has no municipal stormwater drains on or in the immediate vicinity of the site. The Inspection Team asked if any other liquids or fluids were stored at the site other than oil, and Mr. Bachand stated that there was antifreeze, hydraulic fluid, a gasoline cart (slide 40), and washer fluid. Mr. Bachand said that the antifreeze and washer fluid are reused on site or sold to customers in bulk.

When inspectors asked if customers are allowed onto the main salvage site, Mr. Bachand explained that customers are not allowed to “pick and pull” parts and that only employees are allowed outside of the main office building. The site has several gates and locks preventing unauthorized access.

When asked about tires, Mr. Bachand explained that he uses Bob’s Tire Service out of New Bedford to take all old tires off the site. He said he does not store or maintain tire piles.

Mr. Bachand stated that Westover Auto stores dry car shells via a “handshake agreement” lease activity on the Belchertown Salvage property.

The Inspection Team and Mr. Bachand left the office building through the back and walked into the first automotive processing area to begin the facility tour.

B. Facility Tour

The main Westover Auto office building (highlighted in orange on Slide 128) has a customer and records area at the front and is connected via a doorway to an inventory and initial parts breakdown area in the back (slides 2–5). The rear area is on a large bare concrete slab and contains lifts, toolboxes, fluid draining funnels and containers, and parked heavy equipment. Mr. Bachand stated that this area is where initial part inventory takes place. He added that easily removable parts, such as headlight housings, are pulled and cataloged nearby on a shelf by technicians (slides 16, 17). Inspectors observed and photographed visible water and/or oil accumulation and staining on the floor in this area (slide 2, 3, 5, 6, 11, 12). When inspectors asked about indoor drains, Mr. Bachand responded that there were none. Inspectors observed several barrels (slides 5, 6, 11). Mr. Bachand identified the blue barrel Mr. Bachand as antifreeze, while he identified the black barrels as containing waste oil waiting to be pumped into the waste oil furnace. Mr. Bachand stated that the black barrels were under 55 gallons each. Inspectors observed that each container was unlabeled, so Mr. Bachand sometimes had difficulty relaying container contents to the Inspection Team during the walkaround.

Inspectors observed the first of the Facility’s four waste-oil burn-off systems in the main office building (slides 4, 8, 9). It is a Lanair system that takes in waste oil from the auto breakdown process and burns it for heat.

Inspectors observed the inventory space directly adjacent to the breakdown work area. Mr. Bachand explained that parts that are pulled from cars are pressure washed in the

large warehouse (slide 128), then brought to this inventory room to be wrapped and shelved (slides 15, 16, 17). He said this room also serves as a garage space for a large bulldozer that is used around the Westover lot (slide 15). He added that tires are also stored in this area before they are picked up by Bob's Tires (slide 15).

This building opened into the exterior industrial area, central to the three main buildings (slide 18). The car storage yard extends farther back (west) of the site, past the main breakdown and washing building, labelled "large warehouse" in red (slide 128) by about 200 yards. Mr. Bachand took the Inspection Team to the adjacent building, which is the engine warehouse building (slide 19, 128). Inspectors observed scrap metal stored outside around the building, but the entrance was kept clear. Upon walking inside, the Inspection Team observed large metal racks holding about 100 engines that Mr. Tolpa said had been drained of oil, power washed, and inventoried for re-sale (slides 20, 21, 22, 23).

In addition to the engines, inspectors observed several large plastic totes stacked on top of each other (slides 22, 24) storing waste oil. The oil totes are listed on the site's Spill Prevention, Control, and Countermeasure ("SPCC") plan and have 275-gallons capacity each. Mr. Bachand identified one of these totes as being half-full of antifreeze, although the tote was not clearly labeled. The oil in these totes is pumped in and out for use in the waste oil burners in all of the site's buildings. Inspectors observed several 55-gallon barrels (slides 23, 25) that were also not clearly labeled. Mr. Bachand stated that the barrels are used to store waste oil or antifreeze.

Inspectors observed a covered vehicle crusher is situated beside the engine storage building (outlined in green on the aerial photo in slide 128). This crusher is trailer mounted but appeared to inspectors to be permanently parked on a concrete slab, and underneath a dedicated shed (slide 27, 28). Mr. Bachand stated that only dry (no oil, no engine) vehicles go into the crusher. The crusher can be moved should it need repairs. Mr. Bachand informed inspectors that the crusher and shed were purchased and built, respectively, in 2019.

Directly behind the roofed crusher, inspectors observed assorted and uncovered vehicle scrap (slide 29), a large walk-in storage container (slide 30), and overturned 55-gallon drums (slide 31, 32). When inspectors asked about the purpose of these barrels, Mr. Bachand said he could not recall their intended purpose. The Inspection Team then began to walk the site's perimeter behind the crusher. The site perimeter is defined clearly by trees (slide 29). The site significantly decreases in elevation going west, towards an area of wetlands and Batchelor Brook. Inspectors observed an earthen berm along the perimeter of the property. The Inspection Team observed the accumulation of fine sediment along the base of the berm line indicating stormwater flow paths (slide 33, 34).

At this point in the tour, the Inspection Team and Mr. Bachand entered the largest of the site's buildings (colored red in the site map on slide 128). Mr. Bachand explained this building houses most of the Facility's vehicle processing activities. Inspectors observed a large open workspace with no indoor walls that Mr. Bachand said is kept warm by a heated concrete floor and a waste oil burner (slide 36, 37, 47). Inspectors counted three waste oil totes in this building ready to accept fluids from vehicle draining (slides 35, 36,

38). Inspectors also saw parts ready to be washed as well as portable liquid collection funnels (slide 41). Inspectors further observed a labelled gasoline cart with a capacity of 250 gallons inside the building. Mr. Bouchard said the cart is utilized for mobile equipment fueling (slide 40). The floor of this building slopes downwards at a considerable gradient, terminating in the Facility's parts wash area (slide 42).

The part wash area is separated from the rest of the building by a thick industrial curtain that reaches up to the ceiling (slide 42). Mr. Bachand told inspectors that any parts that will be put for sale are washed in this area, including engines. He said that the wash water is collected in a large drain (slide 42, 43) that pumps the water directly into an "ESD Waste2Water" closed-loop wash system (slide 45). Mr. Bachand stated that this system was common among larger salvage yards for their water/oil separation and containment. Mr. Bachand also stated that this system completely recycles all wash water via an aerobic biological process complete with aeration (slide 46). When the Inspection Team asked if any of this water was lost during the process or pumped outside this system, Mr. Bachand said that the process water does not leave and is recycled for future power washing of other parts. The Inspection Team did not observe any immediate discharges from this building during the inspection.

Upon leaving the large warehouse, Mr. Bachand stated that the Inspection Team was observing an outdoor drained vehicle storage area containing between 700 and 800 vehicles (slide 48). Resuming perimeter tour, the Inspection Team continued to follow the earthen berm (slide 49, 50, 54). Inspectors observed pools of water at the northern edge of the property (slides 51, 52, 55), as well as general site flooding (slide 53). Directly adjacent to this area is a large, wooded wetland (slides 56, 57, 58, 59). Inspectors documented potential pathways for stormwater to discharge from the property into the wetlands via areas of the berm that are deteriorated (slides 52, 55). Inspectors marked areas where the berm is at risk of overflow from the site with yellow caution triangles on the site map (see slide 128).

Inspectors also observed the large oil storage truck parked in this area, outlined in purple on the site map (slide 60, 128). Mr. Bachand stated that on warm days, the truck is kept in this area and used to gather waste oil to eventually be used in the oil heater burn-off system. Mr. Bachand stated that on cold days, the truck is parked inside the wash building. He said he did not know if the truck's oil tank was double walled. Inspectors observed that the truck's hoses appeared to be in good shape (slide 61) and were stored under a covered area of the truck. Mr. Bachand said that oil is pumped in via an access on the top of the truck, that has a raised plug to keep water from infiltrating (slide 62). The Facility's SPPC Plan identifies the storage capacity of this truck as 2,800 gallons.

Following the berm to the west (slides 63-65), the Inspection Team observed that the construction of the berm became more robust (wider and higher) the farther back into the property it went. Mr. Bachand stated that this part of the berm had been constructed in the early 2000s. Directly behind the berm, inspectors could see a large wetland area (slides 63, 65, 68, 75). Inspectors noticed a large plastic pipe on the wetland side of the berm (slides 66, 67, 68). Mr. Bachand stated that he had never noticed the pipe before and did not know what it was connected to. Inspectors observed that the inside of the pipe was

half-full of rocks and wet mud but did not observe any water flow (slide 67). Mr. Bachand stated that he would have the pipe removed.

Inspectors observed pooled water at the far back (western portion) of the site (slides 69, 71-74). Inspectors observed that the water was a foot or more deep at its deepest point and that wetlands are directly opposite the earthen/rock berm that retains the accumulated water. The berm in this area is several feet wide (slide 75) and the water surface on the Facility side of the berm was at a higher elevation than the water in the wetland. The Inspection Team walked the rim of the berm and observed small amounts of tires and other automobile debris in the wetland outside of the berm (see slide 76). Inspectors also observed additional white plastic pipes within the berm itself (slide 70). Inspectors saw that these pipes appeared to be dry. Inspectors did not observe any discharges of water from this area of the berm. Mr. Bachand stated that he walks the berm once every few months to check its condition. While the berm was effective at the time of inspection, this area poses a risk of overflow in the event of a substantial precipitation event. Inspectors marked this section of the berm with a yellow caution triangle (see slide 128). Inspectors observed that vehicles in this area were parked in an orderly fashion (slides 77-79).

The Inspection Team and Mr. Bachand continued walking along the southern extent of the berm, heading east toward the entrance of the site. Inspectors observed that the berm appeared to be well maintained (slides 82, 83) except for one point where inspectors saw stormwater discharging from the site through a channel in the berm (slides 84, 85, 86, 87). Inspectors again marked this berm failure with a yellow caution triangle on the site map (see slide 128). Inspectors observed sediment deposition within the adjacent wetland area (slide 86). Mr. Bachand told inspectors that this break had not been present the last time he walked the berm, which he said had been before winter, and that it would be repaired as soon as possible.

At this point, inspectors had reached the entrance gate of the Facility and the inspectors moved to the Belchertown Salvage area. Due to the condition of the dirt road leading to the site being completely unnavigable on foot or with the EPA vehicle, Mr. Bachand invited the Inspection Team to access the site by riding on Westover Auto's bulldozer. Mr. Bachand and the Inspection Team proceeded to the site traveling down the UFP access road (slide 95).

Upon entering the front of the Belchertown Salvage site, inspectors observed approximately 100 vehicles (slides 96-100). Mr. Bachand stated that the cars were owned by Westover Auto. He said the vehicles are moved to the site by the bulldozer on a semi-regular basis as needed when Westover Auto's main yard is full. Mr. Bachand stated that some of the vehicles are not owned by Westover Auto but had been left over from Belchertown Salvage's operations. According to Mr. Bachand, the proportion of cars owned by Westover vs. Belchertown decreases the further west into the property one travels. Mr. Bachand stated he does not use the land at the very back (southwest) of the Belchertown Salvage site at all. Mr. Bachand told inspectors that the vehicles stored along the access easement in the east, abutting the UFP lumber facility, are all owned by Westover Auto. He said that there is no system to demarcate who owns which car.

At the back of the main dirt road, inspectors observed large numbers of tires (slides 100-106, 108) in piles or mixed in with the scrap cars. Inspectors also saw large scrap piles of metal present at the back of the site (slide 107). Inspectors observed large amounts of pooled water in and among the piles.

Upon reaching the very end of the dirt road, the Inspection Team left the bulldozer and began inspecting on foot. There was a thick mud/ash mix on the ground that made travel difficult. Mr. Bachand stated that there was a large tire fire in 1986 that burned for several days at this site. The Inspection Team observed that many of the tires were burned and cracked from heat.

The largest pile of tires is located at the most southwesterly point of the site. It is a large field of tires (slides 109, 110, 111, 112) that Inspectors estimate to be a little under an acre in size and multiple feet deep. Mr. Bachand stated that these piles were created by Belchertown Salvage over the course of that business's life and were left when that business ceased operations. He stated that he has requested a quote from the tire disposal service used by Westover Auto for the cost to remove the piles. He said he has not received an estimate to-date. He further stated that Westover Auto does not add material to these piles.

There is a dirt road running along one side of the large tire pile (slides 112, 113, 114) that leads back into the wooded area surrounding this parcel. This area is very muddy and is part of the wetlands that abut Batchelor Brook. Inspectors walked the perimeter of this site directly adjacent to the wetland and observed that there was an old berm between the wetland and the back of the site (slides 115, 116). At the time of inspection, inspectors did not observe discharge of water from the site in this location. Additionally, inspectors observed that this berm appeared to be holding back most of the tires from escaping. However, inspectors observed many tires in and around the wetlands and the adjoining forest along with various other pieces of scrap (slides 117, 118, 119, 120, 121). Inspectors saw that these tires were in various stages of decay and none of them appeared fresh.

At this point, the Inspection Team had walked the whole perimeter of the berm, observing further tire piles and scrap vehicles (slides 122, 123). Inspectors observed that the scrap piles contained various bits of metal, plastics, wood, and tires. Inspectors also noted an approximately 1,500-gallon storage tank in the area (slides 124, 125). Mr. Bachand told inspectors that he did not know the volume of the tank, and inspectors observed that it appeared to be rusting and not operational.

C. Records Review

Mr. Bachand presented Westover Auto's SPCC Tier 1 plan/checklist at the Inspection Team's request. He stated that the oil capacity he presented in the 308 response was still accurate and that the total capacity for oil storage on his site is under 10,000 gallons.

D. Closing Conference

Inspection Team departed at approximately 3:30 PM.

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.