



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

Thru: Todd Borci, Manager, Water Compliance Section 1

To: File

I. Facility Information

- A. *Facility Name:* P&T Enterprises, Inc. DBA 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(s) of inspection:* March 17, 2023
- B. *Weather Conditions:* Cloudy, cold, 45°
- C. *US EPA Representative(s):*
Damian Bednarz, Jeremy Rolfe
- 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. The 308 outlined questions pertaining to general business and ownership information, nature of facility operations and industrial activities, and oil pollution regulation questions. In response, Westover 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 2021 Multi-Sector General Permit (“MSGP”) applicability.

IV. Facility Description

Westover Auto Salvage, referred to hereafter as “Westover Auto” is a salvage operation at 147 Bay Road in Belchertown, MA. 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, identified that Mr. Bachand leases part of this land parcel (referred to hereinafter as “Belchertown Salvage”, which was the previous operating name for industrial activities on this property) for processed car storage.

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. These flow paths were observed at the time of the inspection to be flowing southwest, parallel to the western most 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.

Inspector Team arrived at approximately 10:40 AM.

A. Opening Conference

Mr. Bednarz and Mr. Rolfe (“Inspector Team”) presented their credentials, provided a copy of the Small Business Resources Information Sheet, and explained the purpose of the inspection was to verify the information provided as a response to EPA’s April 11, 2022 information request letter.

Inspector 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 inspector team to a separate office.

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

Mr. Bachand explained that Westover Auto Salvage was founded in 1996. 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 are 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's operation.

The Inspector Team asked Mr. Bachand details about a 2800-gallon oil delivery truck. Mr. Bachand stated that it is used to store and relocate oil on site. This truck is parked in the yard and is routinely parked overnight inside a heated warehouse when conditions are cold. Mr. Bachand 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.

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

The Inspector Team asked Mr. Bachand to then describe the nature of activity at his site. He explained the typical process for any given vehicle; a junk vehicle is brought to the site; employees check for any leaks; the car is put into a separate storage row waiting on processing; the car is inventoried to identify salvageable parts; the car is processed (all fluids, profitable parts, and the engine components are removed); parts are pressure washed, and cataloged (slide 11); the dry car is stored in the yard. The draining and processing are done inside within a large warehouse building.

Parts washing is done indoors and uses a water reclamation system. The total number of cars on the site was stated to be 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 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 31), and washer fluid. The antifreeze and washer fluid are reused on site or sold to customers in bulk.

When 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. His 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 does not store or maintain tire piles.

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

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 office building, labelled 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. Easily removable parts, such as headlight housings, are pulled and cataloged nearby on a shelf by technicians (slides 16, 17). This area had visible water and/or oil accumulation and staining (slide 2, 3, 5, 6, 11, 12) on the floor. When asked about indoor drains, Mr. Bachand responded that there was none. Several barrels were present (slides 5, 6, 11). The blue barrel was identified by Mr. Bachand as antifreeze, while the black barrels were waste oil waiting to be pumped into the waste oil furnace. The black barrels were stated to be under 55 gallons each. Each container was unlabeled, so it was sometimes difficult for Mr. Bachand to relay container contents to the Inspector Team during the walkaround.

The first of four waste-oil burn-off systems was observed in this building (slides 4, 7, 8, 9). This Lanair system takes in waste oil from the auto breakdown process and burns it for heat.

Directly adjacent to the breakdown work area was the inventory space. 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). This room also serves as a garage space for a large bulldozer that is used around the Westover lot (slide 15). 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 us to the adjacent building, which is the engine warehouse building (slide 19, 128). There is scrap metal stored outside around the building, but the entrance is kept clear. Upon walking inside, Inspector Team observed large metal racks holding about 100 engines that have been drained of oil and power washed (slides 20, 21, 22, 23) and are inventoried to re-sell.

In addition to the engines, several large plastic totes are stacked on top of each other (slides 22, 24) and store waste oil. The oil totes are listed on the site's Spill Prevention Control and Countermeasure ("SPCC") plan and have 275-gallons capacity each. One of these totes was identified by Mr. Bachand as being half-full of antifreeze, although this wasn't 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. Several 55-gallon barrels (slides 23, 25, 26) were also present. These barrels were not clearly labeled. It was stated that they are used to store waste oil or antifreeze.

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

Directly behind the roofed crusher is assorted and uncovered vehicle scrap (slide 29), a large walk-in storage container (slide 30), and overturned 55-gallon drums (slide 31, 32). When asked about the purpose of these barrels, Mr. Bachand could not recall their intended purpose. The Inspection Team began to walk the property'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. An earthen berm was evident along the perimeter of the property. Inspector Team observed the accumulation of fine sediment along the base of the berm line indicating stormwater flow paths (slide 33, 34).

At this point the Inspection Team and Mr. Bachand entered the largest of the site's buildings, colored red in the site map (slide 128). Mr. Bachand explained this building houses most vehicle processing activities. A large open workspace (no indoor walls) is kept warm by a heated concrete floor and a waste oil burner (slide 36, 37, 47). There were three waste oil totes in this building ready to accept fluids from vehicle draining (slides 35, 36, 38). Parts ready to be washed as well as portable liquid collection funnels were observed (slide 41). A labelled gasoline cart with a capacity of 250 gallons was observed inside. 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 Westover part 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). Any parts that will be put for sale are washed in

this area, including engines. 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 stated this system completely recycles all wash water via an aerobic biological process complete with aeration (slide 46). Inspector Team asked if any of this water was lost during the process or pumped outside this system. Mr. Bachand answered that the process water does not leave and is recycled for future power washing of other parts. Inspector Team did not observe any immediate discharges from this building during the inspection.

Upon leaving the large warehouse, Mr. Bachand stated the inspection team was observing an area outdoor storage of drained vehicles numbered between 700 to 800 cars (slide 48). Resuming perimeter observations, Inspector Team followed the earthen berm (slide 49, 50, 54). Pools of water at the northern edge of the property were observed (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). Areas where the berm is at risk of overflow from the site has been noted in the site map as a yellow caution triangle (see slide 128).

It was also in this area that the large oil storage truck was parked, outlined in purple on the site map (slide 60, 128). On warm days the truck is kept here and used to gather waste oil to eventually be used in the oil heater burn-off system, but Mr. Bachand stated that on cold days it is parked inside the wash building. He did not know if the truck’s oil tank was double walled. Hoses appeared to be in good shape (slide 61) and were stored under a covered area of the truck. 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 storage capacity of this truck is listed on Westover’s SPCC Plan 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 is 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. The inside of the pipe was half-full of rocks and wet mud, but no water flow was observed (slide 67). Mr. Bachand stated that he would have the pipe removed.

Pooled water was observed at the far back (western portion) of the site (slides 69, 71-74). The water was observed to be a foot or more deep at its deepest point and 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). Additional white plastic pipes were observed within the berm itself (slide 70). These pipes appeared dry. No discharges of water was observed by the Inspection Team 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. This section of the berm is identified as a yellow caution triangle (see slide 128). Vehicles in this area are 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. The berm was observed to be well maintained (slides 82, 83) except for one point where stormwater was observed to be discharging from the site through a channel in the berm (slides 84, 85, 86, 87). This berm failure is denoted in the site map with a yellow caution triangle (see slide 128). Sediment deposition was observed within the adjacent wetland area (slide 86). Mr. Bachand stated that this break had not been present the last time he walked the berm (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 inspection 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 Inspector Team to access the site by riding on Westover'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, approximately 100 cars were observed (slides 96-100). It was stated by Mr. Bachand that the cars were owned by Westover Auto. They are moved to the site by the bulldozer on a semi-regular basis as needed when Westover's main yard is full. Mr. Bachand stated that some vehicles are not owned by Westover, but are left over from Belchertown Salvage operations. 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. Cars stored along the access easement in the east, abutting the UFP lumber facility, are all owned by Westover Auto. There is no system to demarcate who owns which car.

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

Upon reaching the very end of the dirt road, the Inspector 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 Inspector 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. No estimate has been received to-date. He further stated that Westover 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). No observable discharge of water from the site was in this location at the time of the inspection. Additionally, this berm did seem to hold back most of the tires from escaping. However, many tires are in and around the wetlands and the adjoining forest along with various other pieces of scrap (slides 117, 118, 119, 120, 121). These tires were in various stages of decay. None 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). The scrap piles contained various bits of metal, plastics, wood, and tires. An approximately 1,500 gallon storage tank was also observed in the area was observed (slides 124, 125). The volume of the tank was unknown by Mr. Bachand, and it appeared to be rusting and not operational.

C. Records Review

Mr. Bachand presented Westover's SPCC Tier 1 plan/checklist upon 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.