U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION III WATER BRANCH, ENFORCEMENT
AND COMPLIANCE ASSURANCE DIVISION
CLEAN WATER ACT
COMPLIANCE INSPECTION REPORT

for

Name of Facility: Shifflett's Used Auto Parts
Facility Address: 724 Gorsuch Road, Rear, Westminster, MD 21157
Mailing Address: 724 Gorsuch Road, Westminster, MD 21157

Report Prepared on: 3/21/2022 By: Taylor Fontaine,
Date *Signature*
Environmental Scientist (PG Environmental)

Report Final as of: March 23, 2022 By: Steven Maslowski, EPA
Date *Signature*

General Information

Type of Inspection:	Stormwater
Owner:	Jeff Shifflett
Operator:	Jeff Shifflett
Permittee:	Shifflett's Used Auto Parts
NPDES Permit No:	MDR003328
NPDES Permit Effective Date:	January 1, 2014
NPDES Permit Expiration Date:	December 31, 2018
Receiving Water and/or MS4:	North Branch Patapsco
Latitude and Longitude:	39.56952° N, -76.972423° W

On-Site Facility Inspection Overview

On February 15, 2022, a representative from U.S. Environmental Protection Agency (EPA) Region III and EPA contractors, PG Environmental and Eastern Research Group (hereinafter, collectively referred to as the EPA Inspection Team) conducted a compliance evaluation inspection at Shifflett's Used Auto Parts (hereinafter, Facility) in Westminster, Maryland. A representative from the Maryland Department of the Environment (MDE) also attended the inspection.

Approximate Entry Time: 8:30 AM (EST) **Approximate Exit Time:** 12:00 PM (EST)

Unique Project Identifier (UPI): 3E22WN032A

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I. INTRODUCTION

On February 15, 2022, a representative from U.S. Environmental Protection Agency (EPA) Region III and EPA contractors, PG Environmental and Eastern Research Group (hereinafter, collectively referred to as the EPA Inspection Team) conducted a compliance evaluation inspection at Shifflett's Used Auto Parts (hereinafter, Facility) in Westminster, Maryland. Shifflett's Used Auto Parts is identified as the Permittee. A representative from the Maryland Department of the Environment (MDE) also attended the inspection. The purpose of the inspection was to assess the Permittee's compliance with MDE's National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Stormwater Associated with Industrial Activities (12-SW, Registration No. MDR003328; hereinafter, the Permit; refer to Appendix A). The Facility is classified under Sector M of the Permit, Automobile Salvage Yard (Standard Industrial Classification (SIC) Code 5015 - Motor Vehicle Parts, Used).

The Facility is located at 724 Gorsuch Road, Rear, Westminster, MD 21157, and is an automobile salvage yard. The main service lot had space for about 500 cars at the time of the inspection. The Facility employs about 9-10 staff to process vehicles, operate and maintain the lot, as well as perform administrative functions. Staff from the environmental consulting firm, Grapewell Stormwater Consulting, Inc., perform annual trainings; Stormwater Pollution Prevention Plan (SWPPP) updates; and routine facility, comprehensive site, and quarterly visual inspections for the Facility. Shifflett's Used Auto Parts staff are responsible for all other Permit requirements. The Facility sends quarterly visual monitoring samples to Chesapeake Labs Inc. for analysis. The Facility's onsite SWPPP map identifies one (1) stormwater outfall, Outfall 001. Outfall 001 is located southwest of the vehicle dismantling and office building and discharges offsite into a wooded ravine.

II. INSPECTION PROCESS

Inspection Opening Conference

The EPA Inspection Team arrived at the Facility at approximately 8:30 AM (EST) for the inspection. Mr. Taylor Fontaine of PG Environmental displayed his Clean Water Act Inspector credential to Jeff Shifflett and Cecil Shifflett of Shifflett's Used Auto Parts and Ben Wells of Grapewell Stormwater Consulting, Inc. (hereinafter, Facility representatives). The EPA Inspection Team explained that any information that the Facility deemed to be confidential business information ("CBI") should be identified during the inspection and it would be handled as CBI according to EPA's CBI procedures. Table 1 describes the individuals that participated in the inspection.

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Angela Weisel, Inspector	EPA Region III	(215) 814-2124	Weisel.Angela@epa.gov
Taylor Fontaine, Inspector	PG Environmental	(703) 956-1977	taylor.fontaine@pgenv.com
Kelly Davis, Inspector	Eastern Research Group, Inc.	(703) 633-1646	kelly.davis@erg.com
Facility Representatives			
Jeff Shifflett, Owner	Shifflett's Used Auto Parts	(410) 808-4099	Jshifflett604@gmail.com
Cecil Shifflett	Shifflett's Used Auto Parts	(410) 365-9393	Not provided
Ben Wells, Environmental Consultant	Grapewell Stormwater Consulting, Inc.	(443) 340-7557	ben@grapewellconsulting.com
State or County Representatives			

Name	Affiliation	Telephone	Email
Mark Ecker, Environmental Compliance Specialist IV	Maryland Department of the Environment	(301) 665-2874	mark.ecker@maryland.gov

Weather and Precipitation

Precipitation was not observed on the day of the inspection. Partly cloudy skies with a maximum temperature of approximately 34 degrees Fahrenheit were experienced on the day of the inspection. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and 5 days prior are provided in the table below.

Precipitation Preceding Inspection[1]

Station Name	Date	Precipitation Amount (inches)[2]
Westminster 3.4 SSW, MD US (US1MDCR0036)	2/10/2022	0.00
Westminster 3.4 SSW, MD US (US1MDCR0036)	2/11/2022	0.00
Westminster 3.4 SSW, MD US (US1MDCR0036)	2/12/2022	0.00
Westminster 3.4 SSW, MD US (US1MDCR0036)	2/13/2022	0.18 (rain), 2.5 (snow)
Westminster 3.4 SSW, MD US (US1MDCR0036)	2/14/2022	0.00
Westminster 3.4 SSW, MD US (US1MDCR0036)	2/15/2022	0.00

Facility Site Walk

As part of the process, the EPA Inspection Team visually observed Facility conditions in the presence of the Facility representatives. Areas viewed during the Facility site walk include:

- Vehicle dismantling and office building (the Main Building);
- Used battery storage;
- Fuel storage;
- Vehicle storage areas;
- Vehicle crushing area;
- Vegetated swale;
- Outfall 001.

The Facility encompasses approximately 3.6 acres and contains a vehicle dismantling and office building (the Main Building), covered battery storage and fluid draining racks (refer to Appendix B, Photographs 1 through 3), aboveground storage tanks (ASTs) for fluid recovery (e.g., gasoline, refer to Appendix B, Photographs 4 through 9), large dirt and gravel storage lots for processed vehicles (e.g., fluids drained and batteries removed, refer to Appendix B, Photographs 10 through 28), and an outdoor vehicle compacting operation (refer to Appendix B, Photographs 29 and 30).

The Facility receives wrecked or abandoned cars and trucks for processing. Vehicles are inspected before they are accepted. Facility representatives stated they do not accept leaking vehicles. Vehicles are purchased from both the public and private towing companies. Once onsite, vehicles are drained of liquids and removed of batteries and engines in the Main Building's dismantling garage. Facility representatives stated that they do not buy cars old enough to have mercury switches. Drained diesel is collected and placed in a 250-gallon AST and stored outside of the Main Building (refer to Appendix B, Photograph 5). Drained gasoline is collected and either used in yard vehicles or removed every two to three months. Other

[1] Source: NOAA National Climatic Data Center (http://www.ncdc.noaa.gov/).

drained fluids such as antifreeze or transmission oil are collected in totes and stored outside until they are removed after three to four months (refer to Appendix B, Photograph 4). Windshield wiper fluid is also recycled onsite. Vehicle parts are either sold to the public or crushed onsite and recycled at a shredding facility in Baltimore.

The Permittee has identified multiple stormwater drainage areas onsite, including one outfall, Outfall 001, located south of the Main Building that receives sheet flow stormwater runoff from the middle of the Facility (refer to Appendix B, Photographs 31 and 32). The EPA Inspection Team also observed a vegetated swale southwest of the Facility's perimeter that appeared to receive sheet flow stormwater runoff and piped discharge from the west area of the Facility (refer to Appendix B, Photograph 33). There are no connections to a stormwater system onsite.

Additional details related to the Facility conditions at the time of the inspection are included in the *Summary of Observations* section below.

Records Review

The EPA Inspection Team conducted a records review to evaluate the Facility's compliance with the Permit. Most of the records and reports required by the Permit were available for review prior to and after the inspection. The Facility's electronic discharge monitoring reports (eDMRs) were provided electronically and reviewed offsite prior to the onsite inspection. The Routine Facility Inspection records, Comprehensive Site Compliance Evaluation records, Quarterly Visual Inspection records, and Annual SWPPP training logs were viewed exclusively onsite. The following were reviewed:

- eDMR data during the period from March 2018 (First Quarter following Permit effective date through December 2021);
- SWPPP, dated December 8, 2017, and revised SWPPP dated February 15, 2022;
- Routine Facility Inspection records from February 2018 through August 2021;
- Comprehensive Site Compliance Evaluation records for 2018, 2019, 2020, and 2021;
- Quarterly Visual Inspection records for March 2018 through October 2021; and
- Annual SWPPP training logs from 2018, 2019, 2020, and 2021.

Summary of Observations

The following section summarizes the EPA Inspection Team's observations relative to the Facility's Permit requirements, including the status of certain treatment units, operation and maintenance practices, and the Facility's monitoring and reporting documentation.

SWPPP Requirements

Permit Part III.C.2.c states that the site map must provide the following:

i. "size of the property in acres;
ii. the location and extent of significant structures and impervious surfaces
iii. the location and extent for planned restoration of impervious surfaces, or nutrient reduction measures;
iv. directions of stormwater flow (use arrows);
v. locations of all existing structural control measures or BMPs;
vi. locations of all receiving waters in the immediate vicinity of your facility, indicating if any of the waters are impaired and if so, whether the waters have TMDLs established for them;
vii. locations of all stormwater conveyances including ditches, pipes, and swales;
viii. locations of potential pollutant sources identified under Part III.C.3;
ix. locations where significant spills or leaks identified under Part III.C.3 have occurred;

x. locations of all stormwater monitoring points;
xi. locations of all stormwater inlets and outfalls, with a unique identification code for each outfall (e.g., Outfall No. 1, No. 2, etc,) indicating if you are treating one or more outfalls as substantially identical, and an approximate outline of areas draining to each outfall;
xii. municipal separate storm sewer systems, where your stormwater discharges to them;
xiii. locations and descriptions of all non-stormwater discharges identified under Part I.E.3;
xiv. locations of the following activities where such activities are exposed to precipitation:

- fueling stations;
- vehicle and equipment maintenance and/or cleaning areas;
- loading/unloading areas;
- locations used for treatment, storage, or disposal of wastes;
- liquid storage tanks;
- processing and storage areas;"

Observation 1. The Facility SWPPP map maintained onsite did not include all Permit-required elements (refer to Appendix C, Exhibit 1). Specifically, the onsite SWPPP map did not identify the size of the property in acres or the location of the 250-gallon AST stored outside of the Main Building (refer to Appendix B, Photographs 5 and 6). Additionally, the EPA Inspection Team observed an apparent stormwater outfall point (refer to Appendix B, Photographs 27, 28, 48, and 50) that was not identified on the map (see Observation 9).

The Facility provided an updated copy of the SWPPP on February 18, 2022, that included the property size in acres as well as an additional outfall that was discussed during the inspection. The SWPPP map did not include the location of the AST, however (refer to Appendix C, Exhibit 2).

Part III.C.7 states that, "You must modify your SWPPP whenever necessary to address any of the triggering conditions for corrective action in Part IV and to ensure that they do not reoccur, or to reflect changes implemented when a review following the triggering conditions in Part IV.B indicates that changes to your control measures are necessary to meet the effluent limits in this permit. Changes to your SWPPP document must be made in accordance with the corrective action deadlines in Parts IV.C and IV.D, and must be signed and dated in accordance with Part II.C."

Observation 2. The Facility did not sign and date modifications to the SWPPP. The SWPPP provided a space for logging modifications in Appendix 8, SWPPP Modifications (refer to Appendix C, Exhibit 3). This Appendix did not log any modifications, however. Facility representatives stated that SWPPP modifications had been made since the original SWPPP had been completed but did not document specifics.

Routine Facility Inspections

Permit Part V.A.1 states, "At least once per quarter, you must conduct a site assessment that will review the effectiveness of the SWPPP. At least once each calendar year, the routine facility inspection must be conducted during a period when a stormwater discharge is happening."

Observation 3. The Facility did not provide Routine Facility Inspections for Quarter 4 of 2020 or Quarter 4 of 2021 during the inspection. During the inspection the EPA Inspection Team requested to view all available Routine Facility Inspections. Facility representatives provided Routine Facility Inspections from February 2018 through

August 2021. It was unclear whether the Facility conducted monitoring during Quarter 4 of 2020 or Quarter 4 of 2021.

Observation 4. The Facility did not document whether Routine Facility Inspections were being conducted during a period of stormwater discharge (refer to Appendix C, Exhibit 4). It was unclear if one Routine Facility Inspection per year was being conducted during a discharge event.

Benchmark Exceedances

Part V.B of the Permit requires the Permittee to "monitor for any benchmark parameters specified for the industrial sector(s), both primary industrial activity and any co-located industrial activities, applicable to your discharge." The schedule requires the Permittee to "conduct benchmark monitoring quarterly for four (4) full quarters, starting the first full monitoring period (found in Part V.C.7) that occurs, six (6) months after registering under this permit." For data not exceeding benchmarks, after "collection of 4 quarterly samples, if the average of the 4 monitoring values for any parameter does not exceed the benchmark, you have fulfilled your monitoring requirements for that parameter for the permit term." For data exceeding benchmarks after collection of 4 quarters of samples, "if the average of the 4 monitoring values for any parameter exceeds the benchmark, you must review the selection, design, installation, and implementation of selected control measures to determine if modifications are necessary to meet the effluent limits in this permit."
Part IV.B defines a mathematically certain exceedance as a "sum of quarterly sample results to date is more than 4 times the benchmark level." These exceedances also require that the permittee, "review the selection, design, installation, and implementation of your control measures to determine if modifications are necessary to meet the effluent limits in this permit."

Observation 5. The Facility has 29 instances from March 2018 through December 2021 when the average of 4 consecutive parameter monitoring values exceeds benchmark concentrations. These average exceedances occur 14 times for total suspended solids (TSS); 5 times for iron; and 10 times for aluminum. Additionally, the Facility has 9 occurrences of a mathematically certain exceedances, where a single sample concentration is more than four times greater than the limit: 7 TSS exceedances and 2 aluminum exceedances. All monitoring values for TSS, iron, lead, and aluminum are summarized in Tables 2 through 5 below. All benchmark exceedances are highlighted in red.

Table 2. Outfall 001 TSS Monitoring Values (March 2018 through December 2021)

Monitoring Period End Date	Parameter	Limit Value	Concentration	Four Quarter Concentration Averages (Benchmark Exceedances Are Highlighted Red)	% of the Limit (Red if it Exceeds 4X the Benchmark)	Concentration Units
3/31/2018	Solids, total suspended	100	-*	N/A	-	mg/L
6/30/2018	Solids, total suspended	100	-*	N/A	-	mg/L
9/30/2018	Solids, total suspended	100	490	N/A	490	mg/L
12/31/2018	Solids, total suspended	100	21	128	21	mg/L
3/31/2019	Solids, total suspended	100	608	280	608	mg/L
6/30/2019	Solids, total suspended	100	40	290	40	mg/L
9/30/2019	Solids, total suspended	100	91	190	91	mg/L
12/31/2019	Solids, total suspended	100	912	413	912	mg/L
3/31/2020	Solids, total suspended	100	1028	518	1028	mg/L
6/30/2020	Solids, total suspended	100	1020	763	1020	mg/L
9/30/2020	Solids, total suspended	100	284	811	284	mg/L
12/31/2020	Solids, total suspended	100	529	715	529	mg/L
3/31/2021	Solids, total suspended	100	3020	1213	3020	mg/L
6/30/2021	Solids, total suspended	100	173	1002	173	mg/L
9/30/2021	Solids, total suspended	100	134	964	134	mg/L
12/31/2021	Solids, total suspended	100	156	871	156	mg/L

* = Conditional Monitoring - Not Required This Period

Table 3. Outfall 001 Iron Monitoring Values (March 2018 through December 2021)

Monitoring Period End Date	Parameter	Limit Value	Concentration	Four Quarter Concentration Averages (Benchmark Exceedances Are Highlighted Red)	% of the Limit (Red if it Exceeds 4X the Benchmark)	Concentration Units
3/31/2018	Iron, total [as Fe]	1	-*	N/A	-	mg/L
6/30/2018	Iron, total [as Fe]	1	-*	N/A	-	mg/L
9/30/2018	Iron, total [as Fe]	1	0.13	N/A	13	mg/L
12/31/2018	Iron, total [as Fe]	1	0.25	0.10	25	mg/L
3/31/2019	Iron, total [as Fe]	1	1.19	0.39	119	mg/L
6/30/2019	Iron, total [as Fe]	1	-†	0.39	-	mg/L
9/30/2019	Iron, total [as Fe]	1	-†	0.36	-	mg/L
12/31/2019	Iron, total [as Fe]	1	0.32	0.38	32	mg/L
3/31/2020	Iron, total [as Fe]	1	1.22	0.39	122	mg/L
6/30/2020	Iron, total [as Fe]	1	0.49	0.51	49	mg/L
9/30/2020	Iron, total [as Fe]	1	1.07	0.78	107	mg/L
12/31/2020	Iron, total [as Fe]	1	3.135	1.48	314	mg/L
3/31/2021	Iron, total [as Fe]	1	2.87	1.89	287	mg/L
6/30/2021	Iron, total [as Fe]	1	0.943	2.00	94	mg/L
9/30/2021	Iron, total [as Fe]	1	0.7329	1.92	73	mg/L
12/31/2021	Iron, total [as Fe]	1	0.7251	1.32	73	mg/L

* = Conditional Monitoring - Not Required This Period
† = Below detection limit/no detection

Table 4. Outfall 001 Lead Monitoring Values (March 2018 through December 2021)

Monitoring Period End Date	Parameter	Limit Value	Concentration	Four Quarter Concentration Averages (Benchmark Exceedances Are Highlighted Red)	% of the Limit (Red if it Exceeds 4X the Benchmark)	Concentration Units
3/31/2018	Lead, total [as Pb]	0.082	-*	N/A	-	mg/L
6/30/2018	Lead, total [as Pb]	0.082	-*	N/A	-	mg/L
9/30/2018	Lead, total [as Pb]	0.082	0.0036	N/A	4	mg/L
12/31/2018	Lead, total [as Pb]	0.082	0.0021	0.001	3	mg/L
3/31/2019	Lead, total [as Pb]	0.082	0.184	0.047	224	mg/L
6/30/2019	Lead, total [as Pb]	0.082	0.0028	0.048	3	mg/L
9/30/2019	Lead, total [as Pb]	0.082	0.0025	0.048	3	mg/L
12/31/2019	Lead, total [as Pb]	0.082	0.0093	0.050	11	mg/L
3/31/2020	Lead, total [as Pb]	0.082	0.125	0.035	152	mg/L
6/30/2020	Lead, total [as Pb]	0.082	0.0113	0.037	14	mg/L
9/30/2020	Lead, total [as Pb]	0.082	0.013	0.040	16	mg/L
12/31/2020	Lead, total [as Pb]	0.082	0.014	0.041	17	mg/L
3/31/2021	Lead, total [as Pb]	0.082	0.096	0.034	117	mg/L
6/30/2021	Lead, total [as Pb]	0.082	-†	0.031	-	mg/L
9/30/2021	Lead, total [as Pb]	0.082	0.02	0.033	24	mg/L
12/31/2021	Lead, total [as Pb]	0.082	0.0223	0.035	27	mg/L

* = Conditional Monitoring - Not Required This Period
† = Below detection limit/no detection

Table 5. Outfall 001 Aluminum Monitoring Values (March 2018 through December 2021)

Monitoring Period End Date	Parameter	Limit Value	Concentration	Four Quarter Concentration Averages (Benchmark Exceedances Are Highlighted Red)	% of the Limit (Red if it Exceeds 4X the Benchmark)	Concentration Units
3/31/2018	Aluminum, total [as Al]	0.75	-*	N/A	-	mg/L
6/30/2018	Aluminum, total [as Al]	0.75	-*	N/A	-	mg/L
9/30/2018	Aluminum, total [as Al]	0.75	0.533	N/A	71	mg/L
12/31/2018	Aluminum, total [as Al]	0.75	0.569	0.28	76	mg/L
3/31/2019	Aluminum, total [as Al]	0.75	2.31	0.85	308	mg/L
6/30/2019	Aluminum, total [as Al]	0.75	0.117	0.88	16	mg/L
9/30/2019	Aluminum, total [as Al]	0.75	0.163	0.79	22	mg/L
12/31/2019	Aluminum, total [as Al]	0.75	0.419	0.75	56	mg/L
3/31/2020	Aluminum, total [as Al]	0.75	1.79	0.62	239	mg/L
6/30/2020	Aluminum, total [as Al]	0.75	0.524	0.72	70	mg/L
9/30/2020	Aluminum, total [as Al]	0.75	1.22	0.99	163	mg/L
12/31/2020	Aluminum, total [as Al]	0.75	6.177	2.43	824	mg/L
3/31/2021	Aluminum, total [as Al]	0.75	4.42	3.09	589	mg/L
6/30/2021	Aluminum, total [as Al]	0.75	0.0145	2.96	2	mg/L
9/30/2021	Aluminum, total [as Al]	0.75	0.5203	2.78	69	mg/L

Monitoring Period End Date	Parameter	Limit Value	Concentration	Four Quarter Concentration Averages (Benchmark Exceedances Are Highlighted Red)	% of the Limit (Red if it Exceeds 4X the Benchmark)	Concentration Units
12/31/2021	Aluminum, total [as Al]	0.75	0.8508	1.45	113	mg/L

* = Conditional Monitoring - Not Required This Period

Observation 6. The Facility did not document any corrective action measures in the SWPPP in response to the benchmark exceedances. During the inspection, Facility representatives stated that rip rap was placed in areas that discharge to Outfall 001 to address the TSS exceedances. The EPA Inspection Team observed in the Quarterly Visual Monitoring reports that the staff member performing inspections repeatedly observed sediment or brown color in stormwater discharges (refer to Appendix C, Exhibit 5). No corrective action was documented in the SWPPP to address these observations.

Permit Part V.B.4.c states that, "If you are required to do benchmark monitoring for specific pollutants you must report the quarterly measurements no later than 28 days following the Monitoring Period (Part V. C.7), and according to the other Monitoring Procedures (Part V.C)."

Observation 7. The Facility submitted the Quarter 1, 2020 benchmark monitoring measurements 266 days late. The measurements were due by April 28, 2020, and were submitted on January 19, 2021 as shown in the Integrated Compliance Information System data report and the Detailed Facility Report (refer to Appendix C, Exhibits 6 and 7).

Proper Operation and Maintenance

Part III.B.1.b.ii of the Permit states that, "You must keep clean all exposed areas that are potential sources of pollutants, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers. A good practice for ensuring housekeeping activities is performed at regular intervals would be keeping a schedule for routine grounds maintenance and cleanup."

Part III. B.1.b.v. of the Permit states that, "You must stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, and the resulting discharge of pollutants."

Part III.B.1.b. iv. of the Permit states that, "You must minimize the potential for leaks, spills and other releases that may be exposed to stormwater and develop plans for effective response to such spills if or when they occur…Preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage handling."

Appendix D. Sector M.M.2.1 requires the operator to, "Drain vehicles intended to be dismantled of all fluids upon arrival at the site (or as soon thereafter as feasible) or employ some other equivalent means to prevent spills and leaks. You must establish clean-up mechanisms and procedures for all fluids (e.g., anti-freeze, used, oil, used fuel, etc.) for all locations that vehicles will be drained of fluids, or any equipment receives fluids, and ensure all batteries from vehicles are protected from exposure to stormwater upon arrival at the site."

Appendix D. Sector M.M.3.2 requires the operator to, "Assess the potential for the following to contribute pollutants to stormwater discharges: vehicle storage areas, dismantling areas, parts storage areas (e.g., engine blocks, tires, hub caps, batteries, hoods, mufflers), and fueling stations. Facilities that crush vehicles produce a residual fluid that contains petroleum, metal, and glass fines. These byproducts will need to be identified as potential pollutants and measures shall be identified to ensure they do not commingle with stormwater. Fluids collected must be handled appropriately."

Observation 8. The EPA Inspection Team made the following good housekeeping observations at the Facility:

1. The Facility kept a 250-gallon, single-walled AST containing diesel in the yard without secondary containment. The EPA Inspection Team observed petroleum stains on the ground in the immediate vicinity of the AST (refer to Appendix B, Photographs 5 through 7).
2. Petroleum stains and spill absorbent material were observed on the ground in various locations at the Facility (refer to Appendix B, Photographs 6 through 8).
3. The Facility kept multiple uncovered or partially covered engines throughout the yard (refer to Appendix B, Photographs 34 through 41). The Facility also kept an uncovered dumpster onsite that contained engines and a battery (refer to Appendix B, Photographs 42 and 43). The Facility also kept an uncovered dumpster onsite that contained scrap metal (refer to Appendix B, Photograph 44).
4. The Facility did not stabilize all exposed areas throughout the vehicle storage area (refer to Appendix B, Photographs 21 through 26).
5. The Facility kept uncovered tires in the yard north of the Main Building (refer to Appendix B, Photograph 45).
6. The Facility stored an unlabeled drum containing unknown liquid under a tarp with no lid. The drum was not in secondary containment. The area smelled of petroleum products at the time of the inspection (refer to Appendix B, Photograph 46).
7. Spilled antifreeze and transmission fluid was observed around the totes outside of the Main Building's north wall. Spill absorbent material was observed surrounding the totes (refer to Appendix B, Photograph 4).
8. A forklift stored north of the Main Building was observed leaking hydraulic fluid during the inspection. No drip pans or absorbents were observed under or around the vehicle (refer to Appendix B, Photograph 47).
9. Multiple vehicles were observed on the lot where batteries and/or fluids had not been fully removed (refer to Appendix B, Photographs 10, 12 through 20, 34 through 41, and 43).
10. The EPA Inspection Team observed uncontained debris (mostly metal and glass) outside of the crusher (refer to Appendix B, Photographs 29 and 30).

Appendix E of the Permit defines an outfall as, "locations where collected and concentrated stormwater flows are discharged from the facility, including pipes, ditches, swales, and other structures that transport stormwater."

Observation 9. The EPA Inspection Team observed an apparently unmapped outfall location near the southwest perimeter of the property. Specifically, the discharge point appeared to be downgradient of the western half of the Facility and appeared to receive runoff from the Facility (refer to Appendix B, Photographs 27, 28, and 49). Sediment was observed at a pipe that discharges into the vegetated swale located southwest of the property perimeter (refer to Appendix B, Photographs 48 and 50). The EPA Inspection Team also observed sediment and vegetation in the vegetated swale's overflow embankment (refer to Appendix B, Photograph 50). The overflow embankment appeared to receive stormwater flow from the vegetated swale.

Facility representatives stated that the point had previously been identified as an outfall, but the Facility recently removed it. The one mapped outfall identified on the onsite

SWPPP map, Outfall 001, received runoff from the eastern half of the Facility (refer to Appendix B, Photographs 31 and 32).

Closing Conference

After the Facility site walk, the EPA Inspection Team met with the Facility representatives for a closing conference and shared their preliminary observations. The EPA Inspection Team reiterated to the Facility representatives that all preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared were subject to further investigation by the EPA Inspection Team upon the additional review of records and documentation. Additional observations may be contained in this inspection report that were not identified at the time of the closing conference after the additional review of materials following the inspection.

The inspection concluded at approximately 12:00 PM (EST).