United States Environmental Protection Agency

UNPERMITTED INDUSTRIAL FACILITY STORMWATER INSPECTION CHECKLIST

Inspection Date(s):	2/9/2023	
Time:	**Entry:** 12:40 PM	**Exit:** 3:30 PM
Weather Conditions:	Cloudy with temperatures approximately 57° F	
Media/Program:	Water – CWA § 301, 402 – Industrial SW/NEC	
Operator Name:	Carlisle Auto & Truck Salvage, Inc.	
Facility Name:	Carlisle Auto & Truck Salvage, Inc.	
Permit ID or Tracking #:	Unpermitted at the time of the inspection	
SIC Code:	5015 – Motor Vehicle Parts, Used The Facility representative was unsure of the Facility's SIC code. The above SIC code was determined by referencing Dun & Bradstreet, a global business data and analytics company, and was inferred based on the industrial activities occurring at the time of the inspection.	
Facility Address:	10 Gasoline Alley	
(city, state, zip code)	Carlisle, PA, 17013	
Geographic Coordinates:	40.22905°, -77.16238°	
Mailing address:	10 Gasoline Alley	
(city, state, zip code)	Carlisle, PA, 17013	
County:	Cumberland	
Regular Days/Hours of Operation:	Monday – Friday, 8:00 AM – 4:00 PM	
# of Employees at location:	3	
Size of Facility (in acres):	Approximately 16 acres	
Receiving Water(s):	Tributary to Conewego Creek	
Date Facility est. @ location:	At least 60 years according to the Facility representative	
Facility Representative:		
Name: Steve Boore	Title: Owner	Phone #: (717) 249-3489
		Email**:** N/A
Authorized Official:	Contacted? ☒Yes ☐ No	
Name: Steve Boore	Title: Owner	Phone #: (717) 249-3486
		Email**:**
Additional Personnel Participating in Inspection:		
Name: N/A	Title: N/A	
Inspector(s):		
Ivy Koberlein (EPA)	Title: Inspector	Phone: (202) 564-2549
Sean Ireland (EPA)	Title: Inspector	Phone: (202) 564-2923
Shane McAleer (EPA)	Title: Inspector	Phone: (215) 814-5616
Inspection Report Author:		

Name: Ivy Koberlein	Signature: Ivy Koberlein Digitally signed by Ivy Koberlein Date: 2023.04.21 10:06:30 -04'00'	Date: 4/21/2023
Supervisor Review:		
Name: Jessica Duffy	Signature: JESSICA DUFFY Digitally signed by JESSICA DUFFY Date: 2023.04.21 09:50:33 -04'00'	Date: 4/21/23

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 facility conditions at the time of the inspection.

Opening Conference

1) **Attendees:** Steve Boore, Ivy Koberlein, Sean Ireland, Shane McAleer

   On February 9, 2023, U.S. Environmental Protection Agency (EPA) contractors, conducted an industrial stormwater non-filer inspection at Carlisle Auto & Truck Salvage, Inc. located in Carlisle, Pennsylvania (Facility). Ms. Ivy Koberlein of U.S. EPA (EPA) Headquarters, Mr. Sean Ireland of EPA Headquarters and Mr. Shane McAleer of EPA Region III met with the Facility representatives and conducted an opening conference upon arrival. The EPA Inspectors explained the purpose of the inspection was to assess the Facility's compliance status with respect to Pennsylvania's General Permit for Storm Water Discharges Associated with Industrial Activities (MSGP or Permit). At the time of the inspection, the Facility did not have coverage under the MSGP.

   Weather conditions at the time of the inspection were cloudy skies, and temperatures approximately 57° F. According to precipitation data from the National Oceanic and Atmospheric Administration (NOAA)[1], the Harrisburg, Pennsylvania area received 0.1 inches of rain the morning of the inspection. There was no rain during the inspection.

2) Credentials presented to: Steve Boore (Owner)

   Facility acknowledged receiving previous outreach materials or correspondence on Permit requirements? ☐Yes ☒No Describe:
   The Facility representative stated that he was unaware of any previous outreach regarding Permit requirements.

3) Facility has been individually notified by permit authority or EPA that it is subject to stormwater requirements? ☐Yes ☒No Describe:
   The Facility representative stated that he was unaware of any notification by EPA or Pennsylvania regarding stormwater requirements.

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

FACILITY'S OPERATION & PRODUCT DESCRIPTION
The Facility is located on Gasoline Alley in the Borough of Carlisle, Pennsylvania and is approximately 16 acres in size. The Facility is bordered by private grassed property to the north and to the east, Gasoline Alley to the south and across the road a small business with a large gravel lot, and to the west is a daycare and wooded private residence followed by Wolfs Bridge Road. The Facility comprises one multipurpose central building (including uses for office, vehicle processing and storage), a carport over a concrete pad, and outdoor storage of numerous vehicles. The entire Facility is surrounded by a chain link fence which was damaged and contained fence posts in several locations. Refer to Appendix A for an aerial view of the Facility and its location, and a photograph log of the inspection. According to the Facility representative, the Facility stores vehicles, partially dismantles vehicles, and sells used motor vehicle parts. According to the Facility representative, most industrial activity (as defined by 40 C.F.R. 122.26(b)(14)) occurs outside the warehouse, and thus is exposed to precipitation and stormwater. Industrial activities observed at the Facility were consistent with SIC 5015 – Motor Vehicle Parts, Used, which is a SIC code that requires industrial stormwater Permit coverage pursuant to 40 CFR 122.26(b)(14)(vi). **Other industrial facilities owned/operated by same business entity? ☐Yes ☒No Describe:** N/A

SECTION II – OBSERVATIONS

FACILITY OBSERVATIONS	
Possible Pollutant Sources	**Observations**
Loading/Unloading Operations	The Facility has one (1) entrance off Gasoline Alley. No active loading/unloading was observed at the Facility. Facility representatives indicated that trailers bring in the used vehicles and vehicle fluids are then removed near the central building. The vehicles are then unloaded to the yard and/or to the vehicle crusher. Materials from the vehicle crusher are sorted into various piles and removed from the Facility.

FACILITY OBSERVATIONS	
Possible Pollutant Sources	**Observations**
Industrial Manufacturing/ Processing Operations	Vehicle Dismantling: Used vehicles (mostly cars) in various states of disrepair were located outdoors at the Facility for the purpose of dismantling and selling for parts (see Appendix A, Photograph DSCN0019). Vehicle Crushing Activities: The Facility has one (1) vehicle crusher that sits on hard-packed dirt (DSCN0050). An oil stain was observed directly adjacent to the west of the crusher (DSCN0050). A brown / dark red oil product was observed in two (2) pools of water located adjacent to the crusher; a 275-gal oil tank typically used for home heating oil was located near the location of the pools containing the product (DSCN0051, DSCN0052). There was a strong odor of petroleum in the area near the crusher.
Industrial Machinery & Equipment Storage	The Facility has one (1) vehicle crusher, one (1) orange telescopic loader and one (1) yellow front-end loader. The automobile crusher and front-end loader were outdoors and exposed to stormwater (DSCN0050). The orange telescopic loader was stored under a carport with a concrete pad that is exposed to wind on three (3) sides (DSCN0062).
Storage of Industrial Materials or Products	There are outdoor storage areas for automobiles, salvage parts, used automobile tires, used gasoline tanks, used batteries and other materials. The outdoor storage areas had no cover and were exposed to stormwater. Used Parts Storage: The Facility had two (2) pallets of exposed batteries, containing approximately 40 batteries (DSCN0061) per pallet for a total of approximately 80 batteries. There was an exposed battery on top of an unlabeled barrel of liquid (DSCN0066). The Facility has an uncovered dumpster of used car parts (DSCN0056). The Facility had a large uncovered pile of auto parts and trash including tires and fuel tanks (DSCN0049); two (2) piles of tires (DSCN0020, DSCN0033); and tires and other material such as auto parts, trash and debris in smaller piles and littered throughout the Facility (e.g. DSCN0028, DSCN0029). Outdoor Vehicle and Equipment Storage: Most of the Facility is uncovered and exposed to stormwater. The Facility had multiple exposed vehicle engines (DSCN0026, DSCN0031, DSCN0032 and DSCN0071) at least one of which had windshield washer fluids present (DSCN0030).

FACILITY OBSERVATIONS	
Possible Pollutant Sources	**Observations**
Liquid Storage (e.g., Tanks, Liquid Storage Drums)	The large carport connected to the eastside of the central building housed two (2) unlabeled 275-gallon totes and a half-full 55-gallon plastic barrel with an illegible label (DSCN0062). Adjacent to the north of the central building there were approximately 30 exposed metal and plastic 55-gallon drums sitting on a concrete pad that did not have labels present or had illegible labels (DSCN0058). Approximately half the drums appeared to contain liquid. Two (2) unlabeled metal drums did not contain a lid and were filled with liquid containing an oily film on top (DSCN0059, DSCN0060). A brown / dark red oil product was observed on the concrete pad adjacent to one of the lidless drums (DSCN0059). None of the containers had secondary containment or cover.
Waste Storage/Disposal Areas (solid and/or hazardous)	The EPA Inspectors observed a large, uncovered pile of auto parts and trash including tires and fuel tanks (DSCN0049); two (2) piles of tires (DSCN0020, DSCN0033); and tires and other material such as auto parts, trash and debris in smaller piles and littered throughout the Facility (e.g. DSCN0028, DSCN0029). The EPA Inspectors observed an open dumpster of metal scrap mixed with other materials (DSCN0056). None of the above was covered nor enclosed.
Waste Treatment Facilities (e.g., Pretreatment Systems)	There were no waste treatment facilities observed during the inspection.
Fueling Stations/Equipment Maintenance Areas & Cleaning Areas	There were no observed fueling stations nor equipment maintenance areas nor cleaning areas observed during the inspection.
Sediment & Erosion Controls	There were no sediment and erosion controls to control stormwater observed at the Facility. To the north of the Facility property line fence, riprap was observed alongside a roadway on the adjacent property (DSCN0034). To the west, beyond the Facility property line fence, the EPA Inspectors observed what appeared to be a berm (DSCN0073). These types of structures (the riprap and the berm) are typically constructed to control stormwater runoff, which could indicate stormwater discharge from the Facility at these locations.

FACILITY OBSERVATIONS	
Possible Pollutant Sources	**Observations**
Spills/Leaks Handling	Oil product exposed to stormwater was observed on the ground surface adjacent to the drums near the central building (DSCN0058-DSCN0060). A brown / dark red oil product was observed in two pools of water near the crusher (DSCN0051-DSCN0052). Oil stains exposed to stormwater were present on the ground directly adjacent to the crusher (DSCN0050-DSCN0052) and adjacent to the front-end loader (DSCN0063). There was a strong odor of petroleum in the area near the crusher.
Outdoors Shelters	☐ **Temporary (Date Established: N/A)** ☒ **Permanent** The Facility has one large, roofed carport attached to the central building. This carport covers an impervious concrete surface and is exposed to wind on three (3) sides. In this carport is a telescopic loader (DSCN0062).
Evidence of non-stormwater sources/discharges (allowable if permitted under MSGP)?	No evidence of non-stormwater sources/discharges (allowable if permitted under MSGP)
Evidence of process wastewater sources/discharges?	No evidence of process wastewater sources/discharges

OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS	
Number and description of each potential Stormwater Discharge Point from the Facility	The EPA Inspectors observed what appeared to be at least five (5) stormwater discharge points from the Facility: one (1) along the northern property line; and four (4) along the western property line. The EPA Inspectors tracked and observed water from an on-property conveyance pooling in a low area in the northwest corner of the property that appeared to be discharging from the property at a point on the western property line of the facility (DSCN0039-DSCN0047). Pooling of water and soil drainage / topography patterns observed during the inspection appear to indicate the four (4) other discharge points from the Facility: one (1) along the northern property line (DSCN0034-DSCN0037); and three (3) along the western property line (DSCN0067-DSCN0068, DSCN0069-DSCN0070, DSCN0071-DSCN0073).
Evidence of pollutants migrating off the Facility property (stains, deposits, ponding) at discharge points, into Receiving Waters or in MS4	The Facility has auto salvage parts, sediment and other materials directly on top of or blocking several stormwater conveyances. Refer to photos DSCN0023-DSCN0025, DSCN0038-DSCN0039, DSCN0054-DSCN0055.

Evidence of Non-stormwater Discharges leaving Facility (authorized or unauthorized)	There were no observed non-stormwater sources/discharges at the Facility.
Description of general gradients/slopes at the Facility, all apparent discharge points, and discharge pathway from Facility to Receiving Water or MS4 (storm drains, channel, swale, ditches, driveway, pipes, & etc.)	As stated in the Facility's Operation & Product Description section above, the Facility is surrounded by a chain link fence, which was damaged in at least two locations (DSCN0072, DSCN0073) and contained only fence posts in the portion of the fence in the northwest corner (DSCN0044 - DSCN0045). There were no Facility-designated outfalls. Except for the poured concrete parking / loading area near the central building, the Facility surface was dirt / soil, which was hard packed in areas travelled by vehicles. There appeared to be at least five (5) stormwater discharge points along the Facility property line, one of which appeared to be discharging at the time of the inspection (DSCN0039-DSCN0047). Pooling of water and soil drainage / topography patterns appear to indicate evidence of the four (4) other discharge points from the Facility (DSCN0034-DSCN0037, DSCN0067-DSCN0068, DSCN0069-DSCN0070, DSCN0071-DSCN0073). The Facility property was sloped with the highest point being the entrance at the southwest. It appeared that stormwater drains generally in a south to north/northwest direction overland and through several conveyances on the property, and discharges from the Facility through the five (5) discharge points on to adjacent properties to the west and north. The EPA Inspectors tracked and observed the adjacent property conveyances flowing and ultimately discharging to a tributary to Conewego Creek (DSCN0073-DSCN0085). As stated above, the Facility representative was unaware if any of the catch basins are connected to the Borough of Carlisle's combined or separate storm sewer system.

SECTION III – AREAS OF CONCERN

1) The EPA Inspectors observed Facility buying and selling used vehicle parts, an industrial activity classified under SIC Code 5015 – Motor Vehicle Parts, Used.
    a. Businesses classified under SIC Code 5015 are regulated under 40 C.F.R. § 122.26 for stormwater discharges associated with industrial activity.
    b. Vehicle and vehicle parts storage, fluid removal, and loading/unloading operations occur outdoors and are exposed to stormwater.
    c. The Facility did not have coverage under the Permit at the time of the inspection.

2) There were numerous outdoor areas at the Facility with scrap or waste vehicle parts exposed to stormwater.

3) There were several metal and plastic barrels containing liquid without cover or secondary containment without labels or with illegible labels.

4) There appeared to be at least five (5) discharge points from the Facility: one (1) along the northern property line; and four (4) along the western property line.

5) Numerous pollutant sources from industrial activity were observed at the Facility during the inspection. The Facility discharges stormwater to adjacent properties at multiple locations. Stormwater from this Facility flows through stormwater conveyances to a perennial creek to a tributary of Conewego Creek. The Facility had not submitted an NOI for coverage under the MSGP.

SECTION IV – CLOSING CONFERENCE

Attendees: Steve Boore (Facility Owner), and USEPA Inspectors Ivy Koberlein, Sean Ireland, Shane McAleer

USEPA relayed that based on the type of activity observed at the Facility that the Facility likely falls under the SIC therefore requiring permit coverage for Auto Salvage Sector for Stormwater Discharge. USEPA recommended Facility Owner review the PADEP website regarding Industrial Stormwater Permits and that the Facility Owner call a DEP representative regarding the application for said permit. The name and phone number for said PADEP representative was provided to the Facility Owner. The Facility Owner explained that the Facility does not have a permit and never has had a permit. The Facility Owner relayed that the Facility has been in operation for over 60 years and that he was unaware of the need for an Industrial Stormwater Permit.

SECTION V – LIST OF APPENDICES

Appendix A – Photograph Log