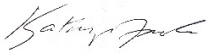
U.S. EPA Headquarters Enforcement Division
1200 Pennsylvania Avenue NW, Washington, DC 20004

UNPERMITTED INDUSTRIAL FACILITY STORMWATER INSPECTION CHECKLIST

Inspection Date	February 28, 2024	
Time	**Entry:** 10:10AM	**Exit:** 10:45 AM
Weather Conditions	70's and sunny	
Media/Program	Water – CWA § 301, 402 – Industrial SW/NEC	
Operator Name:	11th Avenue Auto and Truck Recyclers Inc.	
Facility or Site Name:	11th Avenue Auto and Truck Recyclers Inc.	
Permit ID or Tracking #:	Unpermitted at the time of the inspection	
SIC Code:	Unknown by facility representatives	
Facility Address:	5166 E 11th Avenue & 5151 11th Avenue	
(city, state, zip code)	Hialeah, FL 33013	
Geographic Coordinates:	25.869285°, -80.260962°	
Mailing address:	5166 E 11th Avenue	
(city, state, zip code)	Hialeah, FL 33013	
County:	Miami-Dade	
Regular Days/Hours of Operation:	7:30 AM – 4:00 PM (Mon – Fri); Closed (Sat – Sun)	
# of Employees at location:	4	
Size of Facility (in acres):	Approximately 1.5 acres total with approximately 1.1 acres of outdoor activity	
Receiving Water(s):	Little River Canal, approximately 400' north of the facility	
Date facility est. @ location:	1996	
Onsite Representatives:		
Name: Arnold Diaz	Title: Owner	Phone: 305-687-0309
	Email: arnold@autotruckrecyclers.com	
Authorized Official: →	Contacted? ☒ Yes ☐ No	
Name: Arnold Diaz	Title: Owner	Phone: 305-687-0309
	Email: arnold@autotruckrecyclers.com	
Additional Personnel Participating in Inspection:		
Name: N/A	Title: N/A	
Inspector(s):	**Title:**	**Company:**
Kate Forsmark	Lead Inspector	Eastern Research Group, Inc.
Kelsey Guy	Inspector	Eastern Research Group, Inc.
Rachel Olugbemi	Physical Scientist	Environmental Protection Agency, Headquarters
Jeremy Judd	Environmental Engineer	Environmental Protection Agency, Region 4
Henry Webster	Environmental Specialist I	Florida Department of Environmental Protection, Southeast District
Inspection Report Author:		
Name: Kate Forsmark	Signature: 	Date: March 29, 2024

SECTION I – INTRODUCTION

Purpose of the Inspection

The purpose of the inspection was to determine compliance with the industrial stormwater requirements under §§ 301 and 402(p) of the CWA and its implementing regulations found at 40 CFR Part 122.26. The inspection was unannounced and consisted of interviewing facility representatives, recording field observations, and taking photographs to document site conditions throughout the facility at the time of the inspection.

Opening Conference

1) Brief narrative documenting those present, introductions, presentation of credentials, and explanation of the purpose of the inspection.

   On February 28, 2024, a U.S. Environmental Protection Agency (EPA) contractor, Eastern Research Group, Inc. (ERG), conducted an industrial stormwater nonfiler inspection at 11th Avenue Auto and Truck Recyclers Inc. in Hialeah, Florida (facility). Rachel Olugbemi of EPA Headquarters, Jeremy Judd of EPA Region 4, Kate Forsmark and Kelsey Guy of ERG, and Henry Webster of Florida Department of Environmental Protection (collectively, EPA Inspection Team) met with the facility representative, Arnold Diaz. The EPA Inspection Team presented their credentials and explained that it was EPA's understanding that the facility did not have an industrial stormwater permit. The EPA Inspection Team explained they were onsite to conduct a Clean Water Act stormwater inspection which includes observing the current operations of the facility and assessing the potential for stormwater discharges from the facility.

   The weather at the time of the inspection was sunny and approximately 76°F. According to precipitation data from the National Oceanic and Atmospheric Administration (NOAA)[1], the Hialeah, Florida area received no rain the day of or the day prior to the inspection.

2) Credentials presented to**:** Arnold Diaz

3) Facility acknowledged receiving previous outreach materials or correspondence on Permit requirements?
   ☐Yes ☒ No Describe: N/A

4) Facility has been individually notified by permit authority or EPA that it is subject to stormwater requirements?
   ☐Yes ☒ No Describe: The facility has a solid waste annual operating permit from Miami-Dade County's Department of Regulatory and Economic Resources' Division of Environmental Management (DERM).

FACILITY'S OPERATION & PRODUCT DESCRIPTION

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

Description of business and industrial activities occurring throughout the site. (Include operator's description and note any documentation that further establishes SIC code (permit applications, reports, business registries, website...).

The facility is split into two locations on either side of 11th Avenue, the west yard (5166 E 11th Avenue) is on the west side of E 11th Avenue and the east yard (5151 E 11th Avenue) is directly across the street on the east side of E 11th Avenue (refer to Appendix A). The facility dismantles vehicles in each yard, with a focus on trucks and vans in the west yard and a focus on cars in the east yard. After dismantling, the facility sells the vehicles body parts, engines, and transmissions in the yard where they were dismantled.

The facility purchases vehicles at auction which are delivered to their facility via truck. Once offloaded, vehicles are moved into areas under cover in each yard where they are drained of any fluids not already lost or drained, prior to purchase, by the facility. The engines, transmissions, tires, batteries, and other miscellaneous parts (i.e., lights, doors, mirrors) are removed and inventoried at the facility for resale. Vehicle bodies are stored outside in both yards until they are sold or scrapped.

Per the facility's website (https://autotruckrecyclers.com/) they are an auto salvage facility that reuses most parts and sends the remainder of parts to a scrap recycler.

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

SECTION II – OBSERVATIONS

SITE EVALUATION	
Pollutant Sources	**Note location, quantity/size, design issues, any O&M deficiencies (including the nature and extent), potential pollutants, and evidence of exposure to stormwater. Are BMPs in place to minimize or eliminate stormwater discharges from industrial activities?**
Loading/Unloading Operations	The facility offloads vehicles (i.e., cars and trucks) bought at auction from delivery trucks on E 11th Avenue. The facility moves the vehicles via forklifts to the facility's eastern or western dismantling areas.
Industrial Manufacturing/ Processing Operations	The facility dismantles cars and trucks to resell the individual parts. Dismantling occurs undercover in both the east yard and the west yard (refer to Appendix B, Photographs 5, 6, 16, and 17). The facility drains used oil under cover in both yards. Typically, freon and coolant are drained from the vehicles before arrival at the facility, but occasionally the facility must drain these fluids which is done under cover in both yards.
Industrial Machinery & Equipment Storage	The facility has four forklifts that are stored under cover when not in use (refer to Appendix B, Photographs 6, 7, and 16). The forklifts are diesel and propane powered and are fueled onsite by a third party.

Storage of Industrial Materials or Products	The facility stores vehicle transmissions, engines, and body parts inside the warehouse, in the dismantling areas and in the yard (refer to Appendix B, Photographs 4 through 6, 8 through 12, and 17 through 19). Body parts are only stored for a few months, and if not sold in that time are scrapped.
Liquid Storage (e.g., Tanks, Liquid Storage Drums)	The facility stores used oil drained from vehicles' engines and transmissions under cover in the dismantling areas (refer to Appendix B, Photograph 4).
Pollutant Sources	**Note location, quantity/size, design issues, any O&M deficiencies (including the nature and extent), potential pollutants, and evidence of exposure to stormwater. Are BMPs in place to minimize or eliminate stormwater discharges from industrial activities?**
Waste Storage/Disposal Areas (solid and/or hazardous)	The facility stores used oil, freon, and coolant for disposal in the dismantling area, under cover and in secondary containment (refer to Appendix B, Photograph 4).
Waste Treatment Facilities (e.g., Pretreatment Systems)	Not observed or reported at the facility.
Fueling Stations/Equipment Maintenance Areas & Cleaning Areas	The facility uses a third party to fuel the forklifts onsite. The facility does not have a dedicated area for fueling. Fuel is brought in via truck by the third party.
Sediment & Erosion Controls	Not observed at the facility; approximately half of the ground surface throughout the facility is paved.
Spills/Leaks Handling	Not observed at the facility.
Outside Shelters	**☐ Temporary (Date Established_____) ☒ Permanent** In the west yard of the facility, there is a covered area on the north where trucks are dismantled and drain fluids. The covered area is connected to the parts warehouse (refer to Appendix B, Photograph 6). In the east yard, there is a covered area on the north end for dismantling cars and storing parts (refer to Appendix B, Photographs 15 through 17).
Evidence of non-stormwater sources/discharges (allowable if permitted under MSGP)?	Evidence of non-stormwater sources/discharges were not observed during the inspection.

Evidence of process wastewater sources/discharges?	Evidence of process wastewater sources/discharges was not observed.
OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS	
Number and description of each potential Stormwater Discharge Point from the Facility	In the west yard, the EPA Inspection Team observed the west yard's entrance graded west, away from E 11th Avenue (refer to Appendix B, Photographs 7 and 13). The northwest corner of the yard was graded west towards E 10th Lane (refer to Appendix B, Photographs 21 and 22). The northwest corner of the facility is used for storing vehicle bodies that have undergone dismantling. The EPA Inspection Team observed that the east yard sloped east to west, through the yard's entrance/exit onto E 11th Avenue (refer to Appendix B, Photograph 15).
Evidence of pollutants migrating offsite (stains, deposits, ponding) at discharge points, into Receiving Waters or in MS4	Evidence of pollutants migrating offsite was not observed during the inspection.
Evidence of Non-stormwater Discharges leaving site (authorized or unauthorized)	Evidence of non-stormwater discharges leaving site was not observed during the inspection.
Description of general gradients/slopes onsite, all apparent discharge points, and discharge pathway from Facility to Receiving Water or MS4 (storm drains, channel, swale, ditches, driveway, pipes, & etc.)	The east yard slopes east to west, towards the yard's entrance/exit onto E 11th Avenue, where a storm drain is located approximately 8 feet west of the facility's entrance/exit (refer to Appendix B, Photograph 15). The southern and northern perimeters of the east yard are enclosed by concrete block walls. The EPA Inspection Team observed pooling in two central locations at the facility's west yard (refer to Appendix B, Photographs 7 and 10). The facility did not have perimeter controls in the northwest portion of the facility and was graded west towards E 10th Lane. Two storm drains were observed to the west of the facility's west yard along E 10th Lane (refer to Appendix B, Photographs 21 and 22). The Little River Canal is located approximately 400 feet north of the facility.

SECTION III – AREAS OF CONCERN

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

2) The EPA Inspection Team observed storm drains approximately 8 feet west of the facility's east yard entrance/exit. The facility did not have controls in place to prevent stormwater discharges from the site.

SECTION IV – LIST OF APPENDICES

Appendix A – Aerial Location
Appendix B – Photograph Log