

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	08/14/2024	
Media Program:	Water	
Regulatory Program(s)	NPDES Stormwater/CWA 402	
Company Name:	L.A. Look Auto Inc.	
Facility Name:	Alpha Auto Parts	
Facility Physical Location:	10805 Airline Dr.	
(city, state, zip code)	Houston, TX 77037-1207	
Mailing address:	10803 Airline Dr.	
(city, state, zip code)	Houston, TX 77037-1207	
County/Parish:	Harris	
Facility Phone Number	(281) 798-1913	
Facility Contact:	Mr. Luis Alvarenga	Owner
	qcarsla@yahoo.com	
FRS Number:	N/A	
Identification/Permit Number:	TXR05FO19	
Media Identifier Number:	N/A	
NAICS:	423140	
SIC:	5015	
Personnel participating in inspection:		
Sharron A. Crayton	6EN-WS	Inspector/Enforcement Officer
EPA Lead Inspector	<i>Sharron A. Crayton</i>	
Signature/Date	Sharron A. Crayton	10/08/2024
		Date
Supervisor		
Signature/Date	Ruben Alayon-Gonzalez	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

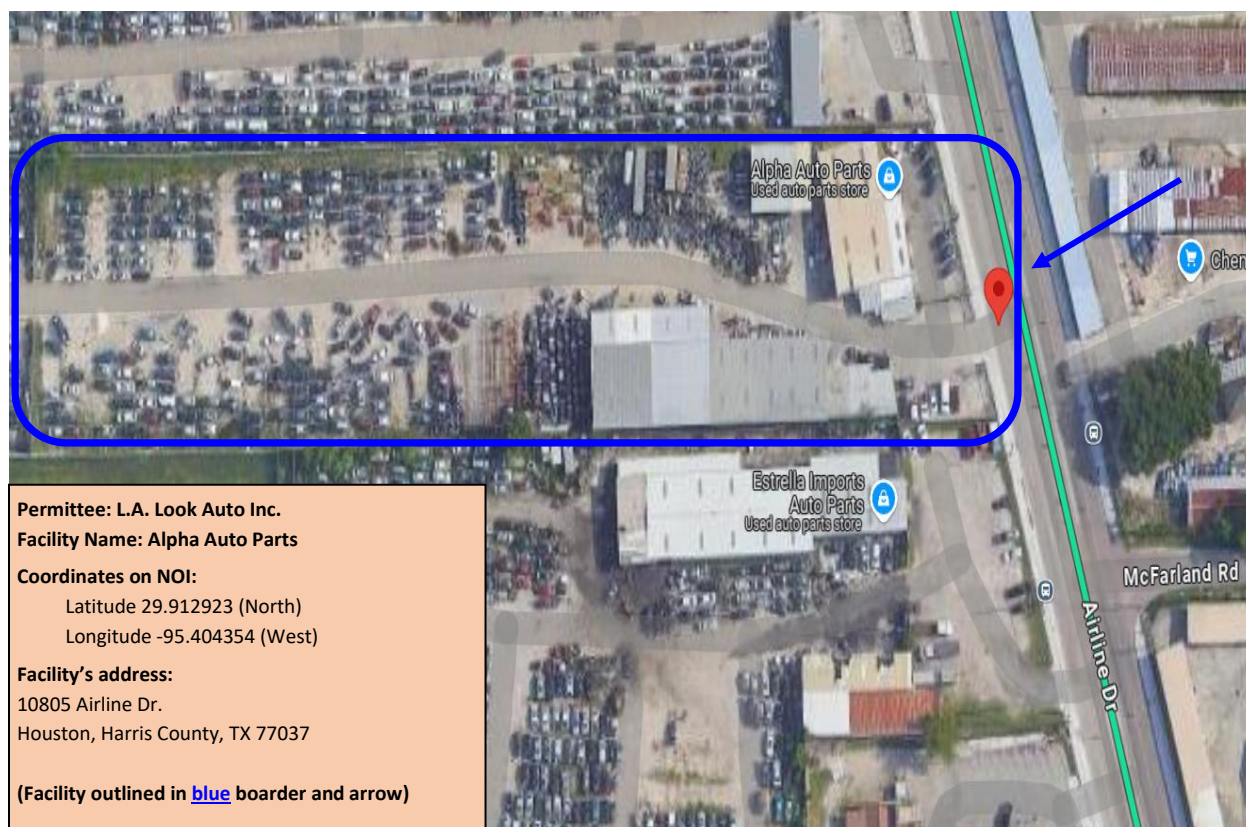
The U.S. EPA Region 6 inspectors Sharron Crayton and Carol Johnson arrived at the Alpha Auto Parts facility on August 14, 2024, at approximately 10:25 AM for an unannounced Compliance Evaluation Inspection (CEI). The inspectors initially met with Mr. Luis Alvarenga, Owner of L.A. Look Auto Inc. – Alpha Auto Parts (permittee). The inspectors presented their credentials and informed Mr. Alvarenga that a random stormwater inspection was being performed to determine compliance with the Texas Pollutant Discharge Elimination System (TPDES) program and the Multi Sector General Permit (MSGP), in accordance with the Clean Water Act (CWA). It should be noted that Alpha Auto Parts maintains a TPDES MSGP (TXR05FO19 – Sector M: Automotive Salvage Yards) issued by the Texas Commission on Environmental Quality (TCEQ), effective February 17, 2022, to discharge stormwater associated with industrial activity, via one (1) outfall (001).

This inspection included a review of Alpha Auto Parts' stormwater pollution prevention plan (SWPPP) and all associated paperwork, as well as a physical on-site inspection of the facility. Mr. Mario Serrano, Manager with Alpha Auto Parts also accompanied Mr. Alvarenga and the inspectors during the on-site inspection. The inspectors also engaged in telephone discussions with the facility's environmental consultant, Mr. Max Sems with Sems Environmental regarding information contained in the SWPPP. Before leaving the site on August 14, 2024, the inspectors conducted a closing conference with Mr. Alvarenga and Mr. Serrano to discuss documentation still required by the EPA that was not present on-site in the SWPPP, and Areas of Concerns identified during the CEI (as detailed in Section III of this report).

The generation of this report is based on information supplied by Alpha Auto Parts (the permittee), observations made by the inspectors, and records and reports maintained by the permittee and/or provided by the permittee's environmental consultant (Sems Environmental), the state of Texas, and the U.S. EPA.

FACILITY DESCRIPTION

Alpha Auto Parts is an automotive scrap and recycling business, advertised as a provider of, "specialized foreign and domestic, new, used, and refurbished salvaged auto parts." Alpha Auto Parts is located at 10805 Airline Dr., Houston, TX 77037, Harris County (denoted in Aerial Image 1 below). Coordinates to the site are in the vicinity of Latitude 29.912923, Longitude -95.404354. The site discharges to Greens Bayou.



Permittee: L.A. Look Auto Inc.
Facility Name: Alpha Auto Parts
Coordinates on NOI:
Latitude 29.912923 (North)
Longitude -95.404354 (West)

Facility's address:
10805 Airline Dr.
Houston, Harris County, TX 77037

(Facility outlined in [blue](#) boarder and arrow)

Aerial Image #1: Overall view of L.A. Look Auto Inc. – Alpha Auto Parts. **Note:** Aerial from Google Maps Imagery, 2024. The latitude and longitude (29.912923 and -95.404354) provided on the MSGP's NOI submitted for TXR05FO19.

Section II - OBSERVATIONS

The following points of discussion are derived from the on-site closing conference and visual observations on August 14, 2024:

1. Mr. Alvarenga was unable to provide a certified, signed, and dated physical copy of the Stormwater Pollution Prevention Plan (SWPPP) and other applicable components of the plan for Alpha Auto Parts MSGP (TCEQ permit number: TXR05FO19) at the time of inspection;
2. The inspectors observed poor housekeeping at the facility;
3. The inspectors noted that material is being stored downstream of the sample location point; and
4. Inspections as required by the MSGP were not performed.

Section III – AREAS OF CONCERN

Areas of concern (AOCs) are derived from on-site observations from the August 14, 2024 Compliance Evaluation Inspection (CEI) and from documents provided electronically by Mr. Max Sems on August 28, 2024.

The following AOCs are derived from the August 14th CEI on-site observations:

Upon reviewing the SWPPP, it was found to be incomplete:

1. In accordance with **TPDES General Permit TXR050000, Part III, Section A(1)(a)**, the SWPPP is not properly signed/certified. In addition, the inspectors were unable to confirm if the plan was revised and updated to accurately reflect current conditions at the site. *Note:* The Notice of Intent (NOI) was submitted and approved by TCEQ on February 17, 2022.
2. Specifically, the following AOCs were noted:
 - a. The plan was not dated, signed, or certified; and
 - b. The last quarterly inspection contained in the on-site files was dated June 5, 2020.
3. Within 180 days of filing an NOI for coverage (or a renewal NOI) the permittee shall conduct a survey of potential non-stormwater sources and shall provide the certification. There was no applicable stormwater certification contained in the plan on-site. **TPDES General Permit TXR050000, Part III, Section B(1)(b)**
4. The facility has not identified Pollution Prevention Team Members and their responsibilities to achieve and maintain compliance with the MSGP. **TPDES General Permit TXR050000, Part III, Section A (2)(a) and (b)**
5. Pollution Prevention Measures and Controls (See Appendix 1, Photograph Log, Photo Nos. 2-18):
 - a. In accordance with **TPDES General Permit TXR050000, Part III, Section A(4)a) and A(4)(b)**, the salvage yard was not maintained in an effective operating condition (i.e., poor housekeeping).
 - i. Trash and other automotive debris and equipment were improperly stored;
 - ii. The permittee was unable to provide a process and/or confirmation that all scrap metal material/equipment was properly drained, prior to discarding in the roll off boxes; and
 - iii. Oily, discarded automotive equipment was stored in open-top containers exposed to the elements, etc. (See Appendix 1, Photograph Log, Photo Nos. 1-4).
6. The inspectors were unable to confirm if annual employee training and education had been provided to applicable staff for Alpha Auto Parts. There was no documentation to support any training efforts and/or written procedures on-site to identifying measures to comply with the MSGP. **TPDES General Permit TXR050000, Part III, Section A(g)**

The following AOC is derived from SWPPP documentation, which was provided via email by Mr. Max Sems on August 28, 2024:

1. After review of information electronically provided by Mr. Sems, it was noted that the permittee has not prepared and/or maintained a SWPPP containing applicable components as required. **TPDES General Permit TXR050000, Part III, Section A(1)(a)** Specially, the following were noted:
 - a. The 115-page document provided and presented as the facility's SWPPP contained a typed date of February 12, 2024, and a cover page followed by a SWPPP Report Reliance and Limitations description. The remaining 113 pages was a copy of the general permitting provisions for MSGP TXR050000.
 - b. A one-page spill response document was provided with nine (9) steps for the facility to follow in the event of a spill. The document referenced informing the pollution prevention team (PPT); however, no PPT was identified in the document (or in any other material listed in this section of this report);
 - c. A two-page document including direct language from the MSGP regarding Spill Prevention and Response Measures and information for the site pertinent Spill

Prevention Detection and Cleanup Procedures was also provided. However, there was no reference to the roles and responsibilities for PPT Members;

- d. No information was provided identifying and/or specific to Best Management Practices (BMPs) and Good Housekeeping Practices;
- e. Information worksheets were provided with dates reflecting October 15, 2022 and November 1, 2023 for associated SWPPP training. The documents included training topics, descriptions, and scheduled dates for the training; however, none of the documents included the names of attendees, nor was the document signed, certified, and dated or included the name and title of the individual providing the training.
- f. The inspection reports provided were not signed and officially certified. The reports only contained a typed name, title, and date of the inspection.

Section IV – FOLLOW UP

The following information was received by the EPA, on August 28th, after leaving the site on August 14, 2024:

- Upon request, Mr. Max Sems, Environmental Consultant with Sems Environmental, via email, provided information including, but not limited to the following:
 - An electronic copy of a document dated February 12, 2024, which was presented as the permittee's SWPPP. The document was not signed or certified by the permittee;
 - An electronic copy of the February 17, 2022 NOI for TXR05FO19;
 - An aerial, location, and site map for Alpha Auto Parts;
 - Rain Gauge Data for January – July 2024;
 - A Spill Prevention and Response Measures and Spill Prevention Detection and Cleanup Procedures document;
 - A Spill Response Document;
 - A Procedure to Conduct Analytical Monitoring;
 - Quarterly inspection reports for the following dates: June 10, 2022; October 13, 2022; February 2, 2023; July 17, 2023; and May 4, 2024. Note: None of the inspections contained an actual signature and certification; and
 - Information worksheets were provided with dates reflecting October 15, 2022 and November 1, 2023 for associated SWPPP training. The documents included training topics, descriptions, and scheduled dates for the training; however, none of the documents included the names of attendees, nor was the document signed, certified, and dated or included the name and tile of the individual providing the training.

Section V – LIST OF APPENDICES

Appendix 1: Photograph Log – 22 photos taken 08/14/2024

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 1

Location: Driveway to Alpha Auto Parts

City: Houston

County: Harris

State: TX



Description: View, of business signage for Alpha Auto Parts.

Date of Photo: 08/14/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 2

Location: Alpha Auto Parts' Salvage Yard

City: Houston

County: Harris

State: TX



Description: View, of Alpha Auto Parts' salvage yard, not maintained in an effective operating condition (e.g., poor housekeeping; trash and other automotive debris and equipment improperly stored).

Date of Photo: 08/14/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 3

Location: Alpha Auto Parts' Salvage Yard

City: Houston

County: Harris

State: TX



Description: View, of full roll off boxes containing scrap metal and other discarded auto parts. Note: The containers were full, uncovered and exposed to the elements, including rainwater that is received at the facility. The permittee was unable to provide a process and/or confirmation that all equipment was properly drained, prior to discarding in the roll off boxes. Closer views provided in following photos #4 and #5.

Date of Photo: 08/14/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 4

Location: Alpha Auto Parts' Salvage Yard

City: Houston

County: Harris

State: TX



Description: Closer view, of full roll off boxes containing scrap metal and other discarded auto parts.

Date of Photo: 08/14/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 5

Location: Alpha Auto Parts' Salvage Yard

City: Houston

County: Harris

State: TX



Description: Closer view, of full roll off boxes containing scrap metal and other discarded auto parts.

Date of Photo: 08/14/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 6

Location: Alpha Auto Parts' Salvage Yard

City: Houston

County: Harris

State: TX



Description: View, of Alpha Auto Parts' salvage yard, not maintained in an effective operating condition (e.g., poor housekeeping; trash and other automotive debris and equipment improperly stored).

Date of Photo: 08/14/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 7

Location: Behind the Vehicle and Parts Storage Warehouse

City: Houston

County: Harris

State: TX



Description: View, of two (2) 5-gallon buckets and a 55-gallon drum/container, not maintained in an effective operating condition (e.g., poor housekeeping). The labeling on one bucket was not legible to confirm contents and the permittee was also unsure (see blue arrow). The other bucket contained hydraulic oil (see red arrow). Note: Oily residue was observed in the immediate vicinity of the two (2) buckets and 55-gallon drum. A closer view of the labeled bucket reflected by red arrow captured in photo #8 and #9. Photo #10 captures a closer view of the 55-gallon drum/container.

Date of Photo: 08/14/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 8

Location: Behind the Vehicle and Parts Storage Warehouse

City: Houston

County: Harris

State: TX



Description: Closer view, of 5-gallon bucket containing hydraulic oil (see red arrow).

Date of Photo: 08/14/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 9

Location: Behind the Vehicle and Parts Storage Warehouse

City: Houston

County: Harris

State: TX



Description: Closer view, of the top of the 5-gallon bucket containing hydraulic oil. Note: Reflected by the red arrow, there was no plug on the bucket, thus exposing the oily material to the elements. In addition, around the uncapped section of the bucket, dampness and staining was observed (see yellow arrows). Oily residue and staining of the ground were also observed in the immediate vicinity of the bucket.

Date of Photo: 08/14/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 10

Location: Behind the Parts Warehouse

City: Houston

County: Harris

State: TX



Description: Closer view, of 55-gallon drum/containers, not maintained in an effective operating condition (e.g., poor housekeeping). The permittee was utilizing the drum/containers as a trash can, which contained oily filters, soiled absorbent pads, and other automotive debris and trash. The drum/containers was exposed to the elements, and oily residue and staining to the ground/soil in the immediate vicinity of the drum/containers was observed.

Date of Photo: 08/14/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 11

Location: Alpha Auto Parts' Storage, Dismantling, and Maintenance Area

City: Houston

County: Harris

State: TX



Description: View, of Alpha Auto Parts' Maintenance Shop, not maintained in an effective operating condition (e.g., poor housekeeping). The permittee was utilizing various-sizes drums/toes/buckets as trash cans, which all contained oily materials exposed to the elements. The location of these containers was outside of the covered area of the shop. Closer views of container contents captured in photos #12 (green arrow), #13 (blue arrow), and #14 (yellow arrow). Details regarding items reflected by red arrows are captured in photos #15 and #17.

Date of Photo: 08/14/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 12

Location: Alpha Auto Parts' Storage, Dismantling, and Maintenance Area

City: Houston

County: Harris

State: TX



Description: Closer view, of yellow container being utilized as a trash can, which contained oily materials exposed to the elements. The location of this container was outside of the covered area of the shop, and contained oily discarded auto parts, absorbent material (kitty litter), and other debris.

Date of Photo: 08/14/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 13

Location: Alpha Auto Parts' Storage, Dismantling, and Maintenance Area

City: Houston

County: Harris

State: TX



Description: Closer view, of white container being utilized as a trash can, which contained oily materials exposed to the elements. The location of this container was outside of the covered area of the shop, and contained oily discarded auto parts, trash, and other debris.

Date of Photo: 08/14/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 14

Location: Alpha Auto Parts' Storage, Dismantling, and Maintenance Area

City: Houston

County: Harris

State: TX



Description: Closer view, of blue container being utilized as a trash can, which contained oily materials exposed to the elements. The location of this container was outside of the covered area of the shop, and contained oily discarded auto parts (hoses), trash, and other debris.

Date of Photo: 08/14/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 15

Location: Wash Bay Area

City: Houston

County: Harris

State: TX



Description: View, of Alpha Auto Parts Oil Bay Area, not maintained in an effective operating condition (e.g., poor housekeeping). While this area is located under a covered shed, it should be noted that due to heavy, oily staining in the immediate area, the potential to impact stormwater runoff is possible. It was evident that the reservoir had experienced overflowing as indicated by the heavy, oily staining along the outer walls of the front of the reservoir (see purple arrows). Closer views of the oil reservoir (reflected by yellow arrow), and white, 5-gallon bucket (see red arrow) are further discussed and captured in photos #16 and #17, respectively.

Date of Photo: 08/14/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 16

Location: Wash Bay Area

City: Houston

County: Harris

State: TX



Description: Closer view, of Alpha Auto Parts Oil Bay Area, not maintained in an effective operating condition (e.g., poor housekeeping). The permittee did not have a formal, consistent, and reliable method for determining when to drain the oily reservoir. Specifically, the inspectors were informed that “they just know when it is time”; however, it was evident that the reservoir had experienced overflowing as indicated by the heavy, oily staining along the outer walls of the front of the reservoir (see photo #15 reflected by purple arrows).

Date of Photo: 08/14/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 17

Location: Wash Bay Area

City: Houston

County: Harris

State: TX



Description: Closer view, of Alpha Auto Parts Oil Bay Area, not maintained in an effective operating condition (e.g., poor housekeeping). The permittee did not have a formal, consistent, and reliable method for determining when to drain the oily reservoir. Specifically, the inspectors were informed that “they just know when it is time”; however, it was evident that the reservoir had experienced overflowing as indicated by the heavy, oily staining along the outer walls of the front of the reservoir (see photo #15 reflected by purple arrows).

Date of Photo: 08/14/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 18

Location: Wash Bay Area

City: Houston

County: Harris

State: TX



Description: View, of Alpha Auto Parts Oil Bay Area, not maintained in an effective operating condition (e.g., poor housekeeping). As reflected by the red arrows captured in photo #11, this section, which is located in between the Maintenance Shop and Oil Bay Area, is not covered, and thus exposed to the elements. As such, the while, 5-gallon bucket had the opportunity to fill up with rainwater. Note: The collected water was turbid. In addition, there was an uncapped quart bottle of auto fluid lying on its side. Staining was also noted at the mouth and immediate vicinity of the bottle.

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 19

Location: On the side of the Vehicle and Parts Storage Warehouse

City: Houston

County: Harris

State: TX



Description: View, on the side of the Parts Warehouse, location of sample point reflected by red arrow. The blue arrow depicts the flow direction of stormwater from the site, and the yellow arrow identifies material stored downstream of the sample collection point. Closer views reflected and additional details provided in the following photos.

Date of Photo: 08/14/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

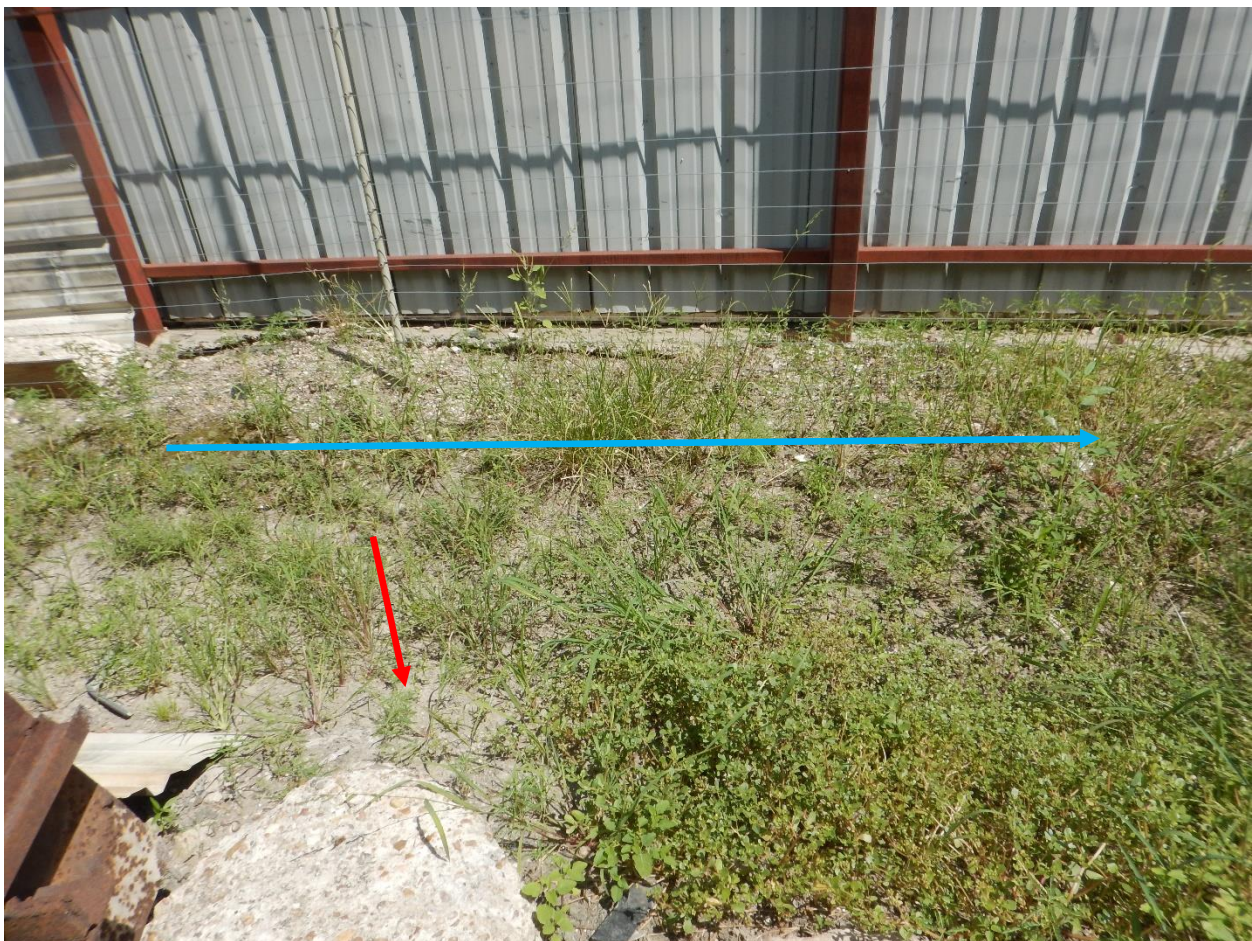
Photo No. 20

Location: On the side of the Vehicle and Parts Storage Warehouse

City: Houston

County: Harris

State: TX



Description: Closer view, on the side of the Parts Warehouse, location of sample point reflected by red arrow. The blue arrow depicts the flow direction of stormwater from the site.

Date of Photo: 08/14/2024 Photographer: Sharron Crayton



L.A. Look Auto Inc. – Alpha Auto Parts
TPDES MSGP #: TXR05FO19
Inspection Date: 08/14/2024

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 21

Location: On the side of the Vehicle and Parts Storage Warehouse

City: Houston

County: Harris

State: TX



Description: Additional view, on the side of the Parts Warehouse, flow direction of stormwater, just north of sample point, and material stored downstream of the sample collection point (yellow arrow).

Date of Photo: 08/14/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 22

Location: On the side of the Vehicle and Parts Storage Warehouse

City: Houston

County: Harris

State: TX



Description: Closer view, on the side of the Parts Warehouse, of material stored downstream of the sample collection point. Items included, but was not limited to, various discarded auto parts, tires, piping, air conditioning ventilation hoses, and a rusted dolly. Note: The location of these items has the potential to contaminate and impact the stormwater discharges and would not be captured via compliance sampling event, particularly since these items are located downstream and of all sampling events.

Date of Photo: 08/14/2024 Photographer: Sharron Crayton