



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

Drafted Date: 19 November 2021

Finalized Date: 1 December 2021

Subj: Inspection Report
Clean Water Act - National Pollutant Discharge Elimination
System ("NPDES")
Larry's Salvage

From: Andrew Spejewski, Enforcement Officer

Thru: Alex Rosenberg

To: File

I. Facility Information

A. Facility Name: Larry's Salvage

B. Facility Location: 75 Fortune Rd
Bradford, NH 03221

C. Facility Contacts: Larry, McDonald
75 Fortune Rd
Bradford, NH 03221
603-938-5656
Cfmcd62@yahoo.com

D. NPDES ID No(s): No permit is in effect; the ICIS tracking # is MAU000505

II. Background Information

A. Date(s) of inspection: November 18, 2021

B. Weather Conditions: Dry, clear

C. US EPA Representative(s):
Andrew Spejewski

D. State/Local Representative(s): none

Federally Enforceable Requirements Covered During the Inspection: Multi-Sector
General Permit for Stormwater Discharges from Industrial Activities.

E.

F. Previous Enforcement Actions: A CWA Section 308 information request was sent to the owner in August 2021. No reply has been received.

III. Type and Purpose of Inspection

Evaluation of compliance with (and/or applicability of) the Multi-Sector General Permit for Stormwater Discharges from Industrial Activities.

IV. Facility Description

The facility is a scrap metal yard. It is located at the end of a dirt drive going south from Fortune Road and crossing a stream before entering the facility.

The yard includes a concrete pad with an open-walled roof, a small office building next to the pad, and several sheds and shipping containers used for storage on the other side of the pad and across a small open yard. The rest of the facility is scrap metal storage.

The center of the site is fairly flat, but otherwise slopes down to the north across the entire site.

A small sawmill area is adjacent to the facility to the east.

V. Inspection

Mr. Spejewski arrived unannounced at about 9:30 AM. Entering the facility and parking, he met Larry McDonald who described himself as the owner of the facility.

A. Opening Conference

Mr. Spejewski presented his credentials, provided a copy of the Small Business Resources Information Sheet, and explained the purpose of the inspection.

Mr. McDonald said he had received questions in the mail from EPA (and a phone message about them) and had given them to a consultant to answer. Mr. McDonald said the consultant apparently was very busy at present and was difficult to get a hold of. He said he would try again to get the consultant to respond.

Mr. McDonald described the site. He said the small portable sawmill operation to the east, immediately adjacent to the scrapyard, was not his and run by someone else.

Mr. McDonald said he was visited regularly by assistance groups from the state, who usually recommended some minor (or very minor) improvements but have never fined him.

Mr. McDonald said he occasionally took cars or other vehicles; all fluids were immediately drained at the lift on the concrete pad (below the roof). He does not take metal shavings or anything with PCB, asbestos, or other hazardous materials. Batteries are stored inside a roofed storage area

B. Facility Tour

The two toured the site. The entrance drive led steeply down from the center of the site towards the site entrance (and beyond that the stream). On either side of the drive (on top of a retaining wall on one side) was metal storage; it appeared some drainage from those areas could travel to the drive.

A high (roughly six feet) earth berm was along the north (downhill) border of the site on each side of the entrance drive. The berm was mostly overgrown with small trees.

Mr. McDonald pointed out a flattish area next to the drive just outside the berm with some sediment deposits; he said the road drains to that area and he usually removes built-up sediment from the area about once a year.

The berm extended to the northwest corner of the site; it appeared that drainage from the site could travel around the west end of the berm and into the wooded area downhill of the site. There was no berm along the west side of the site, which was close to the level of the surrounding terrain, with some metal piles near the edge of the site.

A dirt drive led up around the southwest corner of the site and back towards storage areas along the south side. Mr. McDonald pointed out a ditch that collected drainage from the road and led it off site; the ditch led all the way from the storage areas along the south side of the site. Drainage from the southern scrap metal storage areas appeared to flow through this ditch and off-site.

To the northeast, the high earth berm extended to the northeast corner; it did not appear any drainage led off to the northeast.

Mr. McDonald pointed out oil storage, housed within a rain proof shipping container. There were two containers, about 200-250 gallons each. Mr. McDonald said there was never capacity for 1,000 gallons or more.

C. Records Review

No records were reviewed.

D. Closing Conference

Mr. Spejewski noted that the site appeared to be in a SIC code subject the MSGP, that industrial activities were exposed to stormwater, and that the site at present appeared to discharge. Mr. Spejewski noted that if the berm were extended to retain all stormwater

on-site, there would be no need for permit coverage; otherwise the site appeared to require MSGP coverage.

Mr. Spejewski asked if Mr. McDonald had an email address for EPA communications (such as mailing a copy of the inspection report). Mr. McDonald said he did not, but EPA could contact him through his wife's email address (as above in this report).

Mr. Spejewski then thanked Mr. McDonald for his time and left the site.

Picture List:

[Note that the camera was set to Eastern Daylight Time, and the inspection took place during Eastern Standard Time, so the timestamps are one hour later than the actual (EST) time.]

IMG_2577.JPG	Facing down entrance drive
IMG_2578.JPG	Facing west along berm west of entrance drive
IMG_2579.JPG	Facing east along berm along north side west of entrance
IMG_2580.JPG	Northwest corner of site, end of berm
IMG_2581.JPG	West edge of site, facing south
IMG_2582.JPG	Southwest edge of site, facing south
IMG_2583.JPG	Fluid draining area
IMG_2584.JPG	Oil storage shed

** END **

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.