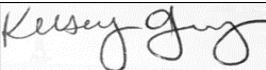


UNPERMITTED INDUSTRIAL FACILITY STORMWATER INSPECTION CHECKLIST

Inspection Date	February 28, 2024	
Time	Entry: 1:03 PM	Exit: 1:28 PM
Weather Conditions	70's and sunny	
Media/Program	Water – CWA § 301, 402 – Industrial SW/NEC	
Operator Name:	Dolphin Used Auto Parts Inc.	
Facility or Site Name:	Dolphin Used Auto Parts Inc.	
Permit ID or Tracking #:	None	
SIC Code:	Unknown by facility representatives ⁵	
Facility Address:	4245 East 10 th Court	
(city, state, zip code)	Hialeah, FL 33013	
Geographic Coordinates:	25.86154°, -80.26183°	
Mailing address:	4245 E 10 th Court	
(city, state, zip code)	Hialeah, FL 33013	
County:	Miami-Dade County	
Regular Days/Hours of Operation:	8:00 AM – 5:00 PM (M – F); Closed (Sat & Sun)	
# of Employees at location:	2	
Size of Facility (in acres):	~0.6 acres total; ~0.3 acres of outdoor activities	
Receiving Water(s):	Hialeah Municipal Separate Storm Sewer System (MS4)	
Date facility est. @ location:	Over 30 years	
Onsite Representatives:		
Name: Iridio Orovio	Title: Manager	Phone: 305-681-4644
	Email: iri1117@bellsouth.net	
Authorized Official: →	Contacted? ☒ Yes ☐ No	
Name: Iridio Orovio	Title: Manager	Phone: 305-681-4644
	Email: iri1117@bellsouth.net	Phone: N/A
Additional Personnel Participating in Inspection:		
Name: N/A	Title: N/A	
Inspector(s):	Title:	Company:
Kelsey Guy	Lead Inspector	Eastern Research Group, Inc.
Kate Forsmark	Inspector	Eastern Research Group, Inc.
Rachel Olugbemi	Inspector	EPA – HQ
Jeremy Judd	Inspector	EPA – Region 4
Henry Webster	Inspector	Florida Department of Environmental Protection
Inspection Report Author:		
Name: Kelsey Guy	Signature: 	Date: May 21, 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 Dolphin Used Auto Parts Inc. located 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, Iridio Orovio. 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 79°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: Iridio Orovio, Manager
- 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).

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

FACILITY'S OPERATION & PRODUCT DESCRIPTION

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 an auto dismantler and parts reseller that purchases vehicles at auctions, dismantles them under cover in the facility's yard, and resells the vehicle parts. More than half of the facility has exposed storage of dismantled vehicles, vehicles to be dismantled, and vehicle parts. The rest of the facility is the covered dismantling area used for dismantling vehicles, draining used vehicle fluids from vehicles, and storing vehicles parts.

Vehicles are delivered to the facility via truck and unloaded, then moved into the facility's yard with a forklift, prior to dismantling. Vehicle bodies are stored onsite until they are sold to a third party as scrap metal.

Per the facility's website (<http://www.dolphinusedauto.com/>) the facility is an automobile 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 has one diesel forklift that is used to load/unload vehicles for dismantling. Loading and unloading occurs at the two northernmost entrances/exits to the facility on East 10 th Court (refer to Appendix B, Photographs 1, 15, 18 and 19).
Industrial Manufacturing/Processing Operations	The facility receives vehicles drained of coolant and antifreeze and moves the vehicles into the facility's yard. Vehicles are dismantled (i.e., removal of batteries, transmissions, engines, and vehicle body parts) and drained of used vehicle fluids in the facility's covered dismantling area (refer to Appendix B, Photographs 2, 10, 11, and 13).
Industrial Machinery & Equipment Storage	The facility's one forklift is diesel powered and stored in the facility's yard. The forklift is taken offsite for refueling as needed.
Storage of Industrial Materials or Products	Materials at the facility include vehicle bodies, engines, transmissions, tires, batteries, and other miscellaneous parts. Engines, transmissions, and other oily parts are stored under cover in the dismantling area. Vehicle bodies are stored throughout the facility's yard, without cover, and on the ground or shelved (refer to Appendix

	B, Photographs 2, 7, 8, 10, 11, and 14).
Liquid Storage (e.g., Tanks, Liquid Storage Drums)	The facility stores used vehicle fluids in a 330-gallon poly tote without secondary containment in the dismantling area (refer to Appendix B, Photograph 2). The EPA Inspection Team did not observe any other used vehicle fluid storage at the time of the inspection. The facility representative stated the vehicles arrive at the facility already drained of coolant and antifreeze.
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 places general waste in a lidded dumpster outside the eastern perimeter on East 10 th Lane that is removed by a third party (refer to Appendix B, Photograph 21).
Waste Treatment Facilities (e.g., Pretreatment Systems)	Not observed or reported at the facility.
Fueling Stations/Equipment Maintenance Areas & Cleaning Areas	Not observed or reported at the facility.
Sediment & Erosion Controls	Not observed or reported at the facility; the facility is fully paved.
Spills/Leaks Handling	Not observed or reported at the facility.
Outside Shelters	☐ Temporary (Date Established _____) ☒ Permanent The EPA Inspect Team observed the facility's dismantling area (i.e., a metal roofed area centrally located in the facility's yard) did not have walls or any type of controls to prevent stormwater from coming into contact with the materials stored there (refer to Appendix B, Photographs 2, 10, and 11). The facility representative stated that vehicle dismantling and draining of used vehicle fluids occurs in this area.

Evidence of non-stormwater sources/discharges (allowable if permitted under MSGP)?	Evidence of non-stormwater sources/discharges was not observed.
Evidence of process wastewater sources/discharges?	Not observed or reported at the facility.
OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS	
Number and description of each potential Stormwater Discharge Point from the Facility	The EPA Inspection Team observed five stormwater discharge points from the facility. The facility's perimeters are primarily concrete cinder block walls or solid walls shared with neighboring facilities, excepting where gates exist at all the facility's entrances/exits, as well as a gap observed in the southwest corner of the facility. The facility has four entrance/exit gates in total: three gates on its western perimeter along East 10th Court and one gate on its eastern perimeter along East 10th Lane. The gates are locations where stormwater would leave the facility due to the facility grade (<u>refer to Appendix B, Photographs 1, 4 through 6, 15, and 17 through 19</u>). The EPA Inspection Team observed an approximately three-foot wide chain linked fence gap in the southern perimeter wall near the southwest corner of the facility (<u>refer to Appendix B, Photograph 9</u>). The opening in the wall is a location for stormwater to leave the site. The EPA Inspection Team observed no stormwater inlets within the facility's boundaries.
Evidence of pollutants migrating offsite (stains, deposits, ponding) at discharge points, into Receiving Waters or in MS4	The EPA Inspection Team observed staining at the facility's middle entrance/exit onto East 10 th Court and at the facility's western yard's entrance and on East 10 th Lane (<u>refer to Appendix B, Photographs 18 and 19</u>).
Evidence of Non-stormwater Discharges leaving site (authorized or unauthorized)	Evidence of non-stormwater discharges leaving the site was not observed.
Description of general gradients/slopes onsite, all apparent discharge points, and discharge pathway from Facility to Receiving Water or MS4	In the eastern portion of the facility's yard, the EPA Inspection Team observed the gradient of the ground surface sloped east towards East 10 th Lane (<u>refer to Appendix B, Photograph 22</u>), directing stormwater in this area to flow east to East 10 th Lane, and then to a stormwater inlet approximately 40' south of the facility's entrance/exit on East 10 th Lane (<u>refer to Appendix B, Photograph 21</u>).

(storm drains, channel, swale, ditches, driveway, pipes, & etc.)	On the east side of the dismantling area, the EPA Inspection Team observed a gradient sloping west (refer to <u>Appendix B, Photograph 1, 11, and 13</u>), directing stormwater to flow west through the dismantling area, through the facility's yard, and out onto East 10th Court to a stormwater inlet directly in front of the facility's entrance/exit (refer to <u>Appendix B, Photographs 1, 11, 13, 15, and 18 through 20</u>). At the time of the inspection, the EPA Inspection Team was unable to determine where the stormwater inlets outside the facility property connected; however, the stormwater inlets are in the City of Hialeah's public right of way. The Miami-Dade County Stormwater Line map² shows Hialeah MS4 stormwater inlets along East 8th Avenue/State Road 953, approximately 1400' west of the facility, and Hialeah MS4 stormwater inlets along East 49th Avenue, approximately 2100' north of the facility.
---	---

SECTION III – AREAS OF CONCERN

- 1) The EPA Inspection Team observed the facility was engaged in dismantling motor vehicles for the purpose of selling parts. These activities are included in the description of SIC Code 5015 – Motor Vehicle Parts, Used. 40 C.F.R. § 122.26 regulates businesses classified under SIC Code 5015 for stormwater discharges associated with industrial activity.
- 2) The facility's dismantling area is covered; however, the EPA Inspection Team observed a gradient sloping east to west from the east side of the dismantling area, directing stormwater in this area to flow west through the dismantling area, facility's yard, and towards stormwater inlets along East 10th Court (refer to Appendix B, Photographs 10 and 11).
- 3) The EPA Inspection Team observed the facility's used vehicle fluids stored in a 330-gallon poly tote without secondary containment in the dismantling area (refer to Appendix B, Photograph 2).
- 4) The EPA Inspection Team observed pooled liquid with a sheen down gradient of the dismantling area (refer to Appendix B, Photographs 12 and 13).
- 5) The EPA Inspection Team observed at least fourteen used batteries stored on the ground surface without cover (refer to Appendix B, Photographs 3, 4, 7, 8, 14, and 16).

SECTION IV – LIST OF APPENDICES

Appendix A – Aerial Location

Appendix B – Photograph Log

² <https://gis-mdc.opendata.arcgis.com/datasets/MDC::stormwater-line/explore?location=25.870564%2C-80.261580%2C16.73>