



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
5 Post Office Square
Boston, MA 02109

Sent via Electronic Mail (*Dated as shown on electronic signature*)

Mr. Paul Bachand, President
P&T Enterprises, Inc. d/b/a Westover Auto Salvage
147 Bay Road
Belchertown, MA 01007
katieparted@aol.com

Subject: March 17, 2023, EPA Inspection of P&T Enterprises, Inc. d/b/a Westover Auto Salvage

Dear Mr. Bachand,

On March 17, 2023, the U.S. Environmental Protection Agency ("EPA") performed an inspection at Westover Auto Salvage, located at 147 Bay Road, Belchertown, MA ("the Facility" or "site"), regarding compliance with the National Pollutant Discharge Elimination System ("NPDES") program of the Clean Water Act ("CWA" or the "Act"). A copy of the inspection report is included as an attachment to this letter along with a photo album.

During the inspection, EPA observed stormwater discharging from points through the berm which the Facility stated had been established to prevent stormwater exiting the site. Due to the inspectors' observations of stormwater discharge associated with industrial activities at the Facility, provide a response confirming and proving that Westover Auto Salvage has completed one of the two actions outlined below. Communicate your decision as to which action the Facility has taken and proof of that action in an electronic format to Damian Bednarz of my staff at bednarz.damian@epa.gov.

1. The industrial activities taking place at the Facility are classified under the Standard Industrial Classification ("SIC") code 5093 (Scrap and Waste Materials) which is an applicable code under the Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity ("MSGP") Subpart N—Sector N—Scrap Recycling and Waste Recycling Facilities. This means that, as currently configured, stormwater discharges from the Facility are not authorized unless and until the Facility obtains coverage under the MSGP.
 - a. **Withing 30 days of receipt of this letter** submit an estimate of the date by which you expect the Facility will submit a Notice of Intent ("NOI") to discharge under the MSGP. The NOI must be submitted via the Central Data Exchange ("CDX"). General information on e-reporting can be found here <https://www.epa.gov/npdes/stormwater-discharges-industrial-activities-ereporting#accessingmsgp>. Steps include:
 - i. Sign-up for an account on CDX – see attachment (#1), and can also can be found here <https://cdx.epa.gov/about/userguide>.

- ii. Add Net-MSGP program service within CDX – see attachment (#2).
- iii. Submit an NOI – see attachment (#3); and
- iv. Add NeTDMR account for monitoring data submission – see attachment (#4).

Upon submission of your Facility's NOI, notify Mr. Bednarz by email, indicating the date of such submission.

- b. **Within 60 days of receiving this letter**, submit a copy of the facility's Stormwater Pollution Prevention Plan ("SWPPP"). A SWPPP template can be found on the national MSGP website¹.
2. Facilities that do not discharge stormwater associated with industrial activities do not require coverage under the MSGP.
- a. **Within 30 days of receipt of this letter**, provide evidence that the berm has been fully repaired and contains all stormwater originating from within the industrial footprint of the site, or a work plan and implementation schedule for these repairs. You must ensure that the berm is repaired in all areas potentially impacted by industrial activities of Westover Auto Salvage. This includes all areas where the company stores cars, even on those portions of the Belchertown Salvage site.
 - b. **Within 30 days of receipt of this letter**, provide evidence that the pipes observed on the downstream side of the Facility (Slide 66, 67) have been permanently sealed or explain how you have concluded that they cannot act as a conveyance of stormwater.

You may refer any questions related to technical issues in this letter to Damian Bednarz of my staff at 617-918-1482 or bednarz.damian@epa.gov. Legal issues may be directed to Sam Horowitz, Enforcement Counsel, at (617) 918-1512 or horowitz.samuel@epa.gov.

Sincerely,
Todd Borci, Manager
Enforcement and Compliance Assurance Division

Enclosures:
Westover Inspection Report and Photo Album

¹ <https://www.epa.gov/npdes/stormwater-discharges-industrial-activities-fact-sheets-and-guidance#guidance>

Attachment #1 - Step 1 CDX_Quick_User_Guide.pdf
Attachment #2 - Step 2 How_to_Add_NeT-MSGP_Program_Service.pdf
Attachment #3 - Step 3 NOI_MSGP_2021.pptx
Attachment #4 - Step 4 Creating_New_Account_NetDMR.pptx

CCs (electronic only):

Susannah King, MA DEP

Matthew Sokop, MA DEP

Sam Horowitz, Enforcement Counsel, US EPA