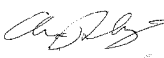


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1, ECAD-WCB
5 Post Office Square - Suite 100, Boston, MA 02109-3912

Clean Water Act (CWA) Inspection Report

Program: Industrial Stormwater	Inspection Type: Compliance Evaluation Inspection (CEI)	
Permittee Name: Chuck Drew	NPDES/ICIS No.: (Unpermitted at time of inspection)	
Inspection Entry Date: November 7, 2023 Inspection Entry Time: 9:06 AM (EDT)	Inspection Exit Date: November 7, 2023 Inspection Exit Time: 10:12 PM (EDT)	
Facility Inspected: Drew's Auto Parts, A Division of Camaro Heaven, 112 Clark Road, Tilton NH 03276	Lat, Long: 43.448773°, -71.614740° NAICS / SIC Code: Not known by the On-site Facility Representative	
EPA Representative(s) on-site: Damian Bednarz (EPA Region 1) EPA Reviewer: Alex Rosenberg		
 Digitally signed by ALEX ROSENBERG Date: 2023.12.20 10:53:12 -05'00'		
State Representative(s): Laurel Pushee (NH DES)		
On-site Facility Representative(s): Chuck Drew, Owner, chuck.drew@camaroheaven.com , 603-286-8855		
Responsible Official: Chuck Drew, Owner, chuck.drew@camaroheaven.com , 603-286-8855		
Name and Signature of Inspector Robert Naeser – Contract Inspector, PG Environmental 	Phone Number/Email (720) 789-8049 rob.naeser@pgenv.com	Date: 12/18/2023

INTRODUCTION:

On November 7, 2023, U.S. Environmental Protection Agency contractor, PG Environmental, conducted an industrial stormwater Compliance Evaluation Inspection (CEI) at Drew's Auto Parts, A Division of Camaro Heaven, located in Tilton, New Hampshire, Belknap County (Facility or Site). Mr. Robert Naeser, an EPA Clean Water Act (CWA) credentialed inspector (EPA Inspector), led the inspection, presented credentials to the On-site Facility Representative, Chuck Drew, upon arrival at the Facility, and conducted an opening conference.

The purpose of the CEI was to assess the Facility's compliance status with respect to EPA's 2021 Industrial Stormwater Multi-Sector General Permit (2021 MSGP). At the time of the inspection, the Facility had not submitted a NOI for coverage under the 2021 MSGP.

Weather conditions at the time of the inspection were overcast skies with temperatures of approximately 42°F. According to precipitation data from the closest National Oceanic and Atmospheric Administration (NOAA) weather station, the Laconia, NH area, received no rainfall in the five days leading up to the inspection.

ATTACHMENTS:

Appendix A – Photograph Log

FINDINGS AND OBSERVATIONS:

Facility Description

The Facility is owned by Chuck Drew, the On-site Facility Representative. The On-site Facility Representative stated the Facility started operating at this address more than 20 years ago. The Facility covers 3.5 acres and employs four people. The Facility dismantles used automobiles for parts and sells used cars and trucks. Vehicles stored on-site are purchased from the public and at auction. Stored vehicles are parked on a concrete pad before processing. Processing is the removal of fluids, batteries, and resalable parts from end-of-life vehicles (ELV) and takes place inside the garage located behind the office. ELVs are parked in the yard after processing, the yard surface is compacted dirt. The Facility employs an outside contractor, as needed, to crush vehicles and unsellable parts on-site.

The Facility has one main building at the northern end of the property that includes the office and garage. A concrete pad south of the main building holds ELVs waiting for processing (refer to Appendix A, Photograph 13). On the eastern side of the Facility there are five shipping containers and one shed that store resalable parts. An access road runs north to south from the entrance to the ELV storage area. The remainder of the Facility stores ELVs (refer to Appendix A, Photographs 2, 7, 8, 12, and 15). Figure 1 is an aerial image of the Facility showing the location of the main building concrete pad, containers and shed, and ELV storage.

The Facility is situated on the south side of a hill and slopes from front (north) to the back (south) (refer to Appendix A, Photographs 2 and 8). Clark Road borders the Facility's north end, the rest of the Facility is surrounded by private property.

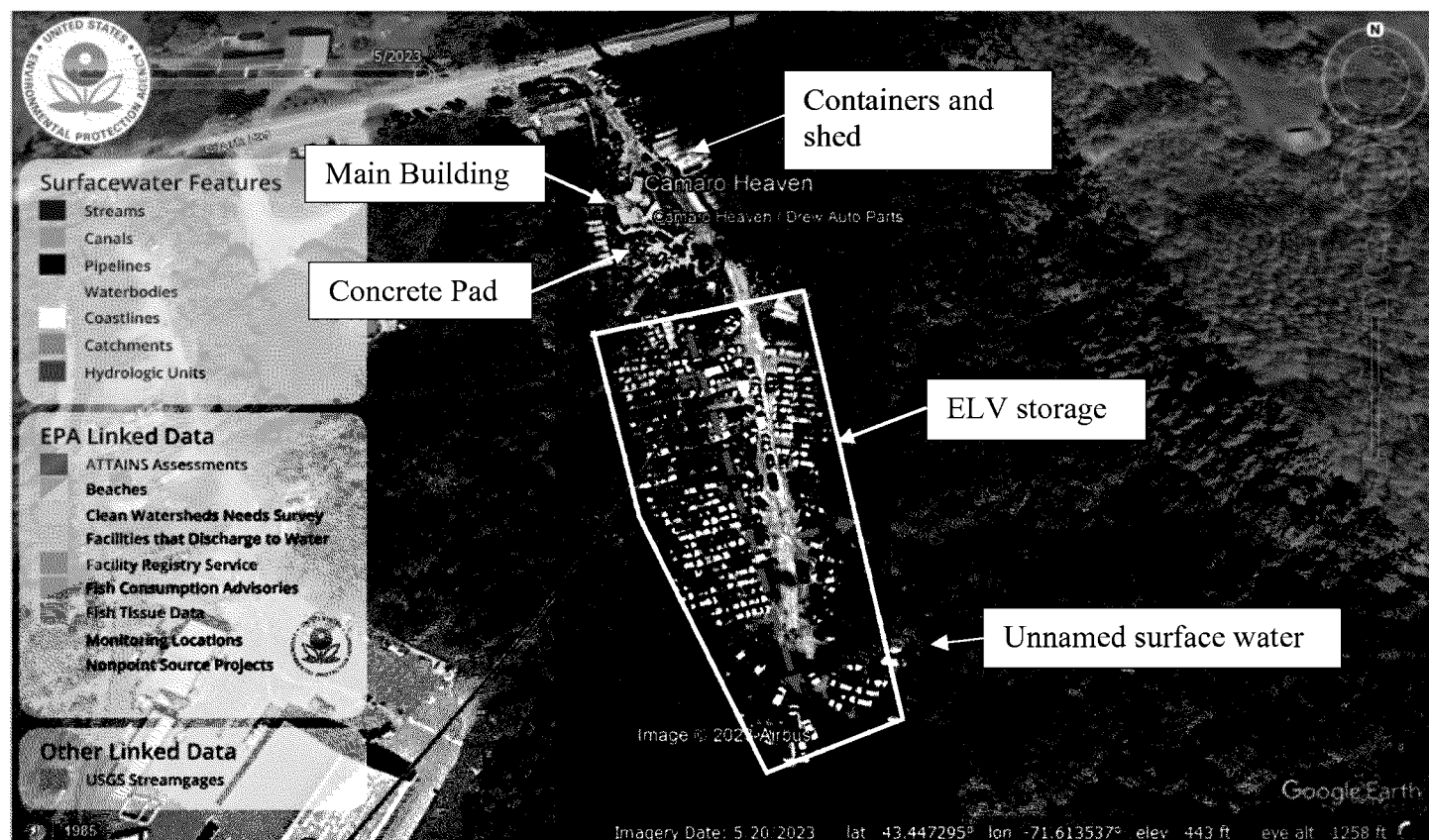


Figure 1. Google Earth with EPA WATERS feature layer aerial view of the Facility. The blue arrows depict observed flow patterns, the red line shows the unnamed surface water mapped by the EPA WATERS extension.

Facility Drainage Systems and Discharges

The yard throughout the Facility is compacted earth. An unnamed receiving water flows along the Facility's eastern and southern perimeter (refer to [Appendix A, Photographs 5, 6, 9, and 10](#) and Figure 1). The unnamed receiving water is a tributary to the Winnepesaukee River located approximately 1,200 feet to the south of the Facility (Figure 2).

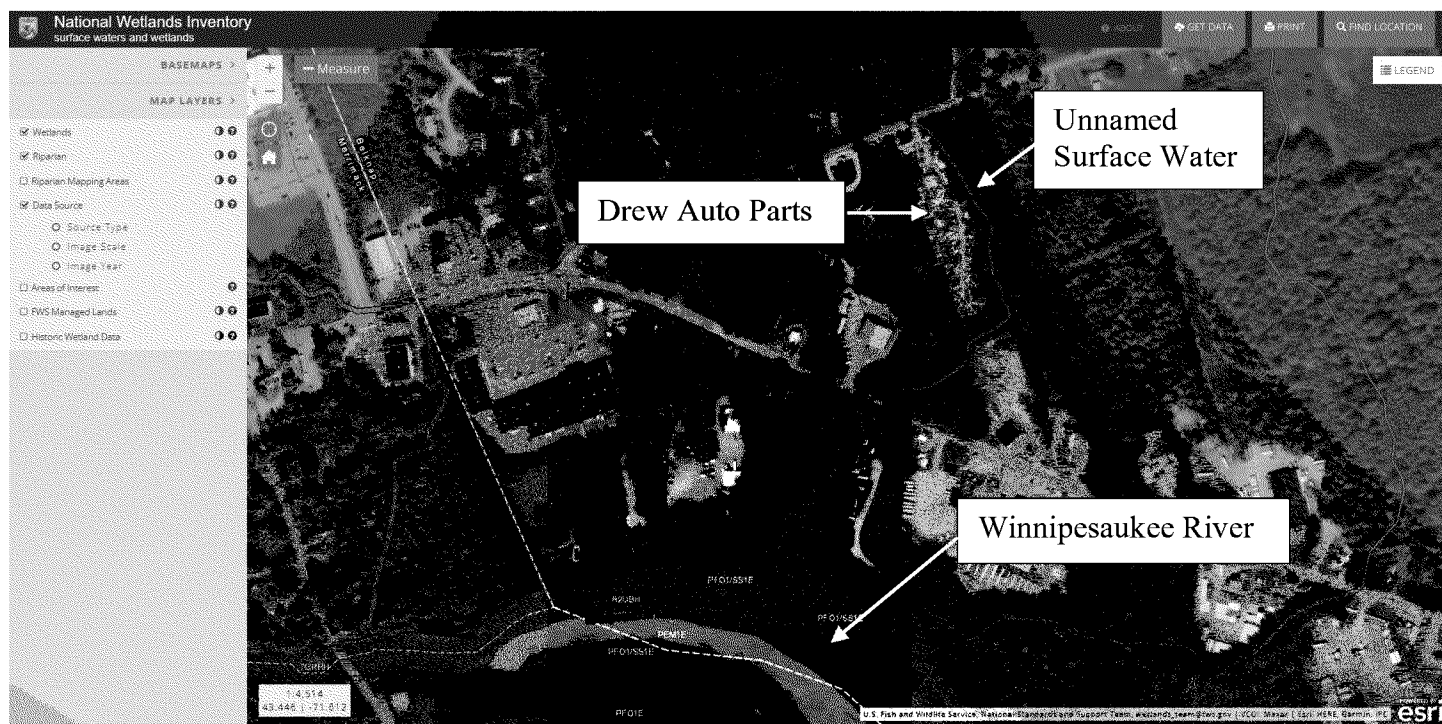


Figure 2. NWI Map of the area surrounding Drew Auto Parts

The EPA Inspector observed stormwater would flow south from the front of the Facility to the back of the Facility then discharge to the unnamed surface water. The unnamed surface water was approximately 10 feet south of the Facility's southern perimeter (refer to [Appendix A, Photographs 2, 4, 5, 6, 7, and 8](#)). The EPA Inspector observed locations along the eastern perimeter where the unnamed surface water was less than five feet away from the ELV storage area, stormwater runoff from ELVs on the eastern edge of the Facility could enter the unnamed surface water at these locations (refer to [Appendix A, Photographs 9 and 10](#)). The EPA Inspector observed that the Facility was not equipped with a berm or other structural best management practice (BMP) to prevent or inhibit the flow of stormwater offsite and into the unnamed surface water.

The EPA Inspector observed the unnamed surface water from the Facility's southern and eastern perimeters. The EPA Inspector also observed where the unnamed surface water crossed under West Main Street in Tilton, NH (refer to Appendix A, Photographs 16, 17, and 18). This location was approximately 500 feet south and downstream from the Facility and approximately 800 feet north and upstream from the Winnepesaukee River. These distances were estimated using Google Earth.

See Figure 1 above for an aerial view of the Facility showing the Facility's general layout, location, and approximate stormwater flow patterns.

Observations

The EPA Inspector observed that the Facility was not equipped with a berm or other structural BMP to prevent or inhibit the flow of stormwater from the Facility and into the unnamed surface water (refer to Appendix A, Photographs 4 and 7).

The EPA Inspector observed two 275-gallon tanks, one for used oil and one for used antifreeze, located under cover on the south side of the main building (refer to Appendix A, Photograph 14). The Facility had one waste oil burner for disposing of waste oil with an associated 225-gallon tank.

The EPA Inspector observed rill erosion running from the east side of the access road to the ELV storage area (refer to Appendix A, Photograph 3).

The EPA Inspector observed a pile of used tires on the southern perimeter, between ELV storage and the unnamed surface water (refer to Appendix A, Photograph 4).

The EPA Inspector observed that most ELVs in the yard were elevated above the ground on rims or tires (refer to Appendix A, Photographs 8 and 12).

The EPA Inspector observed at least one ELV with an uncovered engine in the ELV storage area in the southern portion of the Facility (refer to Appendix A, Photograph 11).

The Facility had at least five shipping containers and one shed used to store resalable used parts. The EPA Inspector observed scrap vehicle parts, including at least one engine, outside of the containers and on the ground (refer to Appendix A, Photograph 15).

The EPA Inspector observed that waste oil and waste antifreeze were stored in 275-gallon single wall tanks under an awning on the south side of the main building (refer to Appendix A, Photograph 14). The tanks did not have secondary containment.

POTENTIAL NONCOMPLIANCE ITEMS:

1. At the time of the inspection, the EPA Inspector identified the following at the Facility:
 - a. The Facility is engaged in automobile dismantling and resale of used automobile parts (SIC Code 5015 – Motor Vehicle Parts, used). SIC Code 5015 is regulated under 40 C.F.R. § 122.26 for stormwater discharges associated with industrial activity.
 - b. The Facility's outdoor areas were used for industrial activities including storage of ELVs, preprocessed vehicles, scrap parts, and tires.
 - c. At the time of the inspection, the Facility did not have coverage under the 2021 MSGP for Stormwater Discharges Associated with Industrial Activity.
 - d. Facility stormwater, from areas used for industrial activities, discharges to an unnamed surface water that flows along the eastern and southern Facility perimeters. The unnamed receiving water runs less than five feet from the eastern perimeter and approximately 10 feet from the southern perimeter. The EPA Inspector observed discrete conveyance paths from the Facility to the unnamed surface water.

AREAS OF CONCERN:

1. At the time of the inspection, the EPA Inspector identified the following at the Facility:
 - a. One ELV with an uncovered engine.
 - b. Scrap parts, including at least one engine, were stored on the ground in front of the storage containers.

- c. Rill erosion was present along the access road from the front of the Facility/main building to the ELV storage area.
- d. Used tires were piled between the ELV storage area and the unnamed surface water along the southern perimeter.
- e. The Facility was not equipped with a berm or other structural BMPs to prevent or inhibit the flow of stormwater from the Facility to the unnamed surface water.
- f. Secondary containment was not provided for the 275-gallon waste oil and waste antifreeze tanks.

CLOSING:

At the conclusion of the inspection, the EPA Inspector held a closing conference with the Facility representative and discussed the preliminary findings and observations of the inspection. The EPA Inspector reiterated that all observations were preliminary and not compliance determinations. The closing conference began at 10:00 AM (EDT) and concluded at approximately 10:12 AM (EDT).