



REGION 10

SEATTLE, WA 98101

RETURN RECEIPT REQUESTED

Mr. Nicholas Ossenkop
Intake Manager
Northwest Auto Parts
5700 Camelot Drive
Anchorage, Alaska 99504

Re: **NOTICE OF VIOLATION**
Northwest Auto Parts
NPDES Permit Number AKR06AA61

Dear Mr. Ossenkop:

The U.S. Environmental Protection Agency (EPA) appreciates your time and cooperation during EPA's September 27, 2023, Clean Water Act (CWA) inspection of the Northwest Auto Parts facility ("Facility"). EPA inspected the Facility and reviewed administrative files to assess the Facility's compliance with the requirements of the CWA and the Alaska Pollutant Discharge Elimination System (APDES) Multi-Sector General Permit for Storm Water Discharges Associated with Industrial Activity (MSGP) AKR060000 ("Permit").

Northwest Auto Parts is permitted to discharge under the Permit AKR06AA61, which became effective on June 16, 2020 and will expire on March 31, 2025.

The purpose of this letter is to notify you of violations EPA has identified following the inspection and file review.

1. Part 9.1 of the MSGP states, in part, "All monitoring data collected pursuant to Parts 7.2 must be submitted to DEC using the NetDMR system [...] no later than the 15th day of the following month after the permittee has received the complete laboratory results for all monitored outfalls for the reporting period. If a waiver from electronic reporting has been granted, paper reporting forms (DMR as provided in Appendix F) must be submitted by the deadline to the appropriate address identified in Part 9.6."

Upon review of Discharge Monitoring Reports (DMRs), EPA observed that the Facility did not submit reports for Quarter 4 of 2022, the monitoring period ending on December 31, 2022 and for Quarter 1 of 2023, the monitoring period ending on March 31, 2023. Failure to submit

DMRs within the 15th day of the following month of the reporting period is a violation of Part 9.1 of the MSGP.

2. Part 9.2 of the MSGP states, in part, “A permittee must submit an annual report to DEC that includes the findings from their Part 6.3 comprehensive site inspection and any corrective action documentation as required in Part 8.4. [...] By February 15th of the year following the reporting year, the permittee must submit the annual report to DEC to the address identified in Part 9.6 or via OASys.”

Upon file review, EPA observed that the Facility submitted the 2022 Annual Report on June 6, 2023. The 2022 report was due by February 15, 2023. Failure to submit an Annual Report by the deadline specified in the Permit is a violation of Part 9.2 of the MSGP.

3. Part 5.6.5 of the MSGP states, in part, “A permittee must amend the Stormwater Pollution Prevention Plan (SWPPP) within thirty (30) calendar days whenever there is a change in design, construction, operation, or maintenance, which has a significant effect on the potential for the discharge of pollutants to waters of the U.S., or if the SWPPP proves to be ineffective in eliminating or significantly minimizing pollutants from sources identified in the SWPPP, or in otherwise achieving the general objectives of controlling pollutants in storm water discharges associated with industrial activity. The SWPPP must be updated at least annually.”

Upon file review, EPA observed that the SWPPP has not been updated since it was finalized on March 31, 2020. Failure to update the SWPPP on a minimum of an annual basis is a violation of Part 5.6.5 of the MSGP.

4. Part 5.2.3.3 of the MSGP requires the SWPPP to include a site map that includes the size of the property in acres, locations of all stormwater monitoring points, and locations of storm water inlets and outfalls, with a unique identification code for each outfall.

Upon file review, EPA observed that the SWPPP did not include the size of the property in acres, and the locations of all monitoring points and outfalls. Failure to include all components of the site map as required by the Permit is a violation of Part 5.6.5 of the MSGP.

EPA’s [Small Business Resources Information Sheet](#) provides information on compliance assistance that may be helpful to you. For more information about the CWA regulations and requirements, please visit the EPA’s webpage: <https://www.epa.gov/enforcement/water-enforcement>.

Although our goal is to ensure NPDES facilities and projects comply fully with their permits, the ultimate responsibility rests with the permittee. I strongly encourage you to continue your efforts to maintain full knowledge of permit requirements, other appropriate statutes and to respond appropriately to ensure compliance. Notwithstanding your response to this letter, EPA retains all rights to pursue enforcement actions to address these and any other violations.

If you have any questions concerning this matter, please do not hesitate to contact Emily Siangkam, of my staff, at siangkam.emily@epa.gov or (206) 553-2964.

Sincerely,

Jeff KenKnight, Manager
Water Enforcement and Field Branch
Enforcement and Compliance Assurance Division

cc: Mr. Charles Ossenkop
Owner, Northwest Auto Parts

Mr. Kris Ossenkop
Operator, Northwest Auto Parts

Mr. Jason Dowell
Operations Manager, Northwest Auto Parts

Mr. Jon Wendel
Manager, Compliance and Enforcement Program, Alaska Department of Environmental
Conservation