

UNPERMITTED INDUSTRIAL FACILITY STORMWATER INSPECTION CHECKLIST

Inspection Date	February 28, 2024	
Time	Entry: 9:10 AM	Exit: 10:00 AM
Weather Conditions	70's and sunny	
Media/Program	Water – CWA § 301, 402 – Industrial SW/NEC	
Operator Name:	Rastro Unique Used Auto Parts	
Facility or Site Name:	Rastro Unique Used Auto Parts	
Permit ID or Tracking #:	Unpermitted at the time of the inspection	
SIC Code:	Unknown by facility representatives	
Facility Address:	1071 East 52nd Street	
(city, state, zip code)	Hialeah, FL 33013	
Geographic Coordinates:	25.870357°, -80.261424°	
Mailing address:	1071 East 52nd Street	
(city, state, zip code)	Hialeah, FL 33013	
County:	Miami-Dade	
Regular Days/Hours of Operation:	8:00 AM – 5:00 PM (M – F); 8:00 AM – 5:00 PM (Sat); Closed (Sun)	
# of Employees at location:	3	
Size of Facility (in acres):	0.75 acres total, approximately 0.5 acres of outdoor activity	
Receiving Water(s):	Little River Canal	
Date facility est. @ location:	Approximately 10 years	
Onsite Representatives:		
Name: Karla Sabat	Title: Owner	Phone: 305-681-8888
	Email: rastrounique@gmail.com	
Authorized Official:	→	Contacted? ☒ Yes ☐ No
Name: Karla Sabat	Title: Owner	Phone:
	Email:	
Additional Personnel Participating in Inspection:		
Name: N/A	Title: N/A	
Inspector(s):	Title:	Company:
Kate Forsmark	Lead Inspector	Eastern Research Group, Inc.
Kelsey Guy	Inspector	Eastern Research Group, Inc.
Rachel Olugbemi	Physical Scientist	Environmental Protection Agency, Headquarters
Jeremy Judd	Environmental Engineer	Environmental Protection Agency, Region 4
Henry Webster	Environmental Specialist I	Florida Department of Environmental Protection, Southeast District
Inspection Report Author:		
Name: Kate Forsmark	Signature: 	Date: March 22, 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 Rastro Unique Used Auto Parts 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, Karla Sabat. 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 71°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: Karla Sabat
- 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: N/A

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 that purchases vehicles from auction. The vehicles are dismantled at the facility and the used parts are sold. Upon arrival at the facility, the vehicles are drained of any remaining fluids, engines and transmissions are removed, and other miscellaneous parts (i.e., doors, lights, mirrors) are disassembled from the vehicle. All parts are stored and sold at the facility. The facility sells vehicle bodies to scrap yards if the vehicle bodies are not sold.

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 offloads incoming vehicles with forklifts; vehicles are both offloaded and temporarily stored adjacent to the entrance/exit on East 52 nd Street (refer to <u>Appendix B, Photographs 2, 3, and 6</u>). The EPA Inspection Team observed unloading of vehicles at the facility at the time of the inspection.
Industrial Manufacturing/Processing Operations	Vehicles are drained of fluids and dismantled for resale of individual parts. Dismantling takes place in an uncovered area in the southeast corner of the facility's yard (refer to <u>Appendix B, Photograph 16</u>).
Industrial Machinery & Equipment Storage	The facility has one propane forklift and one diesel forklift used for loading/unloading and moving vehicles and parts around the yard (refer to <u>Appendix B, Photographs 6 and 8</u>).
Storage of Industrial Materials or Products	The facility stores dismantled vehicles parts exposed to stormwater throughout the yard and under cover inside the facility's warehouse (refer to <u>Appendix B, Photographs 9, 10, and 12 through 16</u>). The facility stores parts until they are sold.
Liquid Storage (e.g., Tanks, Liquid Storage Drums)	The facility has a dedicated area in the northwest corner of the facility's yard for used vehicle fluid storage. The EPA Inspection Team observed three covered 55-gallon drums labeled "only used oil" stored within secondary containment (refer to <u>Appendix B, Photograph 11</u>).

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)	Not observed or reported at the facility.
Waste Treatment Facilities (e.g., Pretreatment Systems)	Not observed or reported at the facility.
Fueling Stations/Equipment Maintenance Areas & Cleaning Areas	The diesel forklift is fueled onsite. The facility dismantles vehicles in an uncovered area in the southeast corner of the facility's yard on the west side of the warehouse (refer to <u>Appendix B, Photograph 16</u>).
Sediment & Erosion Controls	The entire facility is paved with concrete.
Spills/Leaks Handling	The EPA Inspection Team did not observe spill kits at the facility.
Outside Shelters	☐ Temporary (Date Established _____) ☐ Permanent Not observed or reported at the facility.
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 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 the northern perimeter of the facility was directly adjacent to the Little River Canal. The northern portion of the facility was above the canal (refer to <u>Appendix B, Photograph 14</u>). The facility's entrance/exit was graded south (refer to <u>Appendix B, Photographs 4 and 8</u>). The EPA Inspection Team observed a hole where garden hoses were run through in the facility's southern perimeter concrete block wall, downgradient of the southern

	portion of the facility (refer to <u>Appendix B, Photographs 17 through 19</u>).
Evidence of pollutants migrating offsite (stains, deposits, ponding) at discharge points, into Receiving Waters or in MS4	Oil stains were visible within the facility and at the entrance (refer to <u>Appendix B, Photographs 7 and 11</u>).
Evidence of Non-stormwater Discharges leaving site (authorized or unauthorized)	Evidence of non-stormwater discharges leaving site was not observed during the inspection.
Description of general gradients/slopes onsite, all apparent discharge points, and discharge pathway from Facility to Receiving Water or MS4 (storm drains, channel, swale, ditches, driveway, pipes, & etc.)	The facility's northern perimeter is directly adjacent to the Little River Canal (refer to <u>Appendix B, Photograph 14</u>). The facility's yard is generally sloped downward from north to south towards the southern perimeter. The facility's entrance/exit was graded south towards the road, which sloped towards the drain on East 52nd Street (refer to <u>Appendix B, Photographs 4, 5, and 8</u>). The hole in the southern perimeter's wall also was graded south towards the drain on East 52nd Street (refer to <u>Appendix B, Photographs 17 through 19</u>). Facility representatives stated that the drain was owned by the city, and that stormwater flows from the facility and from the street into the drain.

SECTION III – AREAS OF CONCERN

- 1) The Inspection Team observed the facility was engaged in dismantling motor vehicles for the purpose of selling parts, an industrial activity classified under 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 EPA Inspection Team observed the facility storing purchased vehicles delivered from auction outside of the facility uncovered and over a storm drain on East 52nd Street (refer to Appendix B, Photographs 4 and 5). Received vehicles are not drained of fluids before arrival at the facility.
- 3) The EPA Inspection Team did not observe a curb or other barrier to prevent facility stormwater from flowing to the Little River Canal along the facility's northern perimeter (refer to Appendix B, Photographs 12, 13 and 14).

SECTION IV – LIST OF APPENDICES

Appendix A – Aerial Location

Appendix B – Photograph Log