

UNPERMITTED INDUSTRIAL FACILITY STORMWATER INSPECTION CHECKLIST

Inspection Date	February 27, 2024	
Time	Entry: 2:50 PM	Exit: 3:35 PM
Weather Conditions	70's and sunny	
Media/Program	Water – CWA § 301, 402 – Industrial SW/NEC	
Operator Name:	Caribe Truck & Auto Parts	
Facility or Site Name:	Caribe Truck & Auto Parts	
Permit ID or Tracking #:	Unpermitted at the time of the inspection	
SIC Code:	Unknown by facility representatives	
Facility Address:	13000 Port Said Road	
(city, state, zip code)	Opa Locka, FL 33054	
Geographic Coordinates:	25.893077°, -80.252996°	
Mailing address:	13000 Cairo Lane	
(city, state, zip code)	Opa Locka, FL 33054	
County:	Miami Dade	
Regular Days/Hours of Operation:	8:00 AM – 5:00 PM (M – F); 8:00 AM – 1:00 PM (Sat); Closed (Sun)	
# of Employees at location:	4	
Size of Facility (in acres):	Approximately 0.75 acres with approximately 0.6 acres of outdoor activity	
Receiving Water(s):	Little River Canal, approximately 1,000' south of the facility	
Date facility est. @ location:	2005	
Onsite Representatives:		
Name: Efrain Velez	Title: Owner	Phone: 305-685-5949
	Email: velazatruck@aol.com	
Authorized Official:	→ Contacted? ☒ Yes ☐ No	
Name: Efrain Velez	Title: Owner	Phone: 305-685-5949
	Email: velazatruck@aol.com	
Additional Personnel Participating in Inspection:		
Name: Andrea Velez	Title: Manager	
Inspector(s):	Title:	Company:
Kate Forsmark	Lead Inspector	Eastern Research Group, Inc.
Kelsey Guy	Inspector	Eastern Research Group, Inc.
Rachel Olugbemi	Physical Scientist	EPA Headquarters
Jeremy Judd	Environmental Engineer	EPA Region 4
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 27, 2024, a U.S. Environmental Protection Agency (EPA) contractor, Eastern Research Group, Inc. (ERG), conducted an industrial stormwater nonfiler inspection at Caribe Truck & Auto Parts located in Opa Locka Florida (facility). Rachel Olugbemi of EPA Headquarters, Jeremy Judd of EPA Region 4, and Kate Forsmark and Kelsey Guy of ERG (collectively, EPA Inspection Team) met with the facility representatives, Efrain Velez and Andrea Velez. 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 Opa Locka, Florida area received no rain the day of or the day prior to the inspection.

- 2) Credentials presented to: Efrain Velez and Andrea Velez
- 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). DERM conducted an inspection of the facility in 2022, focused on oil storage and spill management.

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 operates as a vehicle dismantler which purchases vehicles (i.e., commercial trucks) from auction or from individuals who sell to the facility. The facility drains any remaining fluids, such as engine and hydraulic oil and antifreeze, from the vehicles. The facility removes tires, batteries, engines, transmissions, and other miscellaneous parts (i.e., doors).

The engines and other used parts are either sold or exported and the metal from the vehicle bodies is sold for scrap. A third party collects and removes the fluids, tires, and batteries from the facility.

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 loads and unloads vehicles for dismantling, parts for resale, and metal scraps for a buyer onto trucks or customers' vehicles. The facility loads containers onsite to export used engines. Loading and unloading are done using one of the facility's four forklifts in the facility's yard near the entrance/exit (refer to <u>Appendix B, Photograph 2</u>).
Industrial Manufacturing/Processing Operations	The facility dismantles commercial trucks to sell individual used parts. Dismantling occurs on an uncovered concrete pad in the center of the facility's yard (refer to <u>Appendix B, Photograph 5</u>). The facility sells scrap metals to a buyer who removes them from site.
Industrial Machinery & Equipment Storage	The facility has four forklifts used to load/unload materials and move vehicles/parts around the yard (refer to <u>Appendix B, Photograph 3</u>). The facility representatives stated they store the forklifts under the roofed area in the yard (refer to <u>Appendix B, Photographs 3 and 9</u>).
Storage of Industrial Materials or Products	The facility stores used vehicle parts throughout the facility's yard (refer to <u>Appendix B, Photographs 5 through 9</u>). The EPA Inspection Team observed that approximately half of the parts were stored without cover and would be exposed to stormwater. Parts stored without cover included engine parts that could be coated

	with oil.
Liquid Storage (e.g., Tanks, Liquid Storage Drums)	The facility stores 55-gallon drums of used oil under cover and in secondary containment (refer to <u>Appendix B, Photograph 9</u>). The EPA Inspection Team observed a tote containing used oil on shelving next to the containment with drums. The tote was under cover but not in secondary containment (refer to <u>Appendix B, Photograph 9</u>). The facility representatives stated fluids (i.e., oil and antifreeze) are drained on site and removed by a subcontractor.
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 EPA Inspection Team observed one portable toilet centrally located at the yard (refer to <u>Appendix B, Photograph 3</u>) and one solid waste dumpster with a lid that was partially open (refer to <u>Appendix B, Photograph 8</u>).
Waste Treatment Facilities (e.g., Pretreatment Systems)	Not observed or reported at the facility.
Fueling Stations/Equipment Maintenance Areas & Cleaning Areas	Forklifts are fueled onsite in the covered area where fluids are stored (refer to <u>Appendix B, Photographs 3 and 9</u>).
Sediment & Erosion Controls	Approximately 50% of the ground surface at the facility is paved and the other 50% is compacted dirt and gravel.
Spills/Leaks Handling	The EPA Inspection Team observed a pallet with at least seventeen bags of absorbent next to the office (refer to <u>Appendix B, Photograph 10</u>).
Outside Shelters	☐ Temporary (Date Established _____) ☒ Permanent The facility has one permanent shelter on the facility's south perimeter used to store vehicle parts (engines and transmissions) and fluids (refer to <u>Appendix B, Photographs 3 and 9</u>), and one permanent shelter attached to the west end of the facility's office on the facility's north perimeter (refer to <u>Appendix B, Photograph 10</u>).

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?	Evidence of process wastewater sources/discharges was not observed.
OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS	
Number and description of each potential Stormwater Discharge Point from the Facility	The perimeter of the facility is enclosed by a concrete block wall apart from the entrance/exit onto Port Said Road. The EPA Inspection Team observed that the entrance graded downward from Port Said Road towards the facility (refer to <u>Appendix B, Photographs 2 and 12</u>). The EPA Inspection Team did not observe any drains nor inlets on site. The facility representative stated that stormwater pools within the facility near the entrance/exit and also on Port Said Road, but stormwater does not cross the entrance.
Evidence of pollutants migrating offsite (stains, deposits, ponding) at discharge points, into Receiving Waters or in MS4	None observed.
Evidence of Non-stormwater Discharges leaving site (authorized or unauthorized)	None observed.
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 perimeter of the facility is enclosed by a concrete block wall, except for the facility's entrance/exit on Port Said Road (refer to <u>Appendix B, Photographs 6, 7, and 11</u>). The EPA Inspection Team observed the entrance graded down from Port Said Road (refer to <u>Appendix B, Photographs 2 and 12</u>). The EPA Inspection Team observed the remainder of the facility generally graded inward. The EPA Inspection Team observed pooled stormwater in the center of the facility (refer to <u>Appendix B, Photograph 8</u>). Port Said Road is graded south towards the Little River Canal, a distance of approximately 1,000 feet. The EPA Inspection Team observed storm drains along the road (refer to <u>Appendix B, Photographs 13 and 14</u>).

SECTION III – AREAS OF CONCERN

1) The 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.

SECTION IV – LIST OF APPENDICES

Appendix A – Aerial Location

Appendix B – Photograph Log