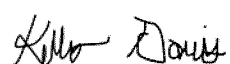


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1, ECAD-WCB
5 Post Office Square - Suite 100, Boston, MA 02109-3912

Clean Water Act (CWA) Inspection Report

Program: Industrial Stormwater	Inspection Type: Compliance Evaluation Inspection (CEI)	
Permittee Name: Kazanjian Used Auto Parts	NPDES/ICIS No.: MAR05D181 (Non-renewer)	
Inspection Entry Date: November 1, 2021 Inspection Entry Time: 10:45 AM (EDT)	Inspection Exit Date: November 1, 2021 Inspection Exit Time: 12:05 AM (EDT)	
Facility Inspected: Kazanjian Used Parts Inc. 615 Dutton Street, Lowell, Massachusetts	Lat, Long: 42.64063°, -71.31907 ° NAICS / SIC Code: 5015 – Motor Vehicle Parts, Used 5093 - Scrap and Waste Materials	
EPA Representative(s): Mike Hogan – EPA Region 1, (406) 498-9723, hogan.michael@epa.gov		
State Representative(s): None		
On-site Facility Representative(s): Arthur Daunais – Parts Manager, (978) 970-4900, kazparts@comcast.net		
Responsible Official: Arthur Daunais – Parts Manager		
Name and Signature of Inspectors	Phone Number/Email	Date:
Kate Forsmark – Contract Inspector, PG Environmental 	(720) 696- 0935 kate.forsmark@pgenv.com	12/7/2022
Kelly Davis – Contract Inspector, Eastern Research Group 	kelly.davis@erg.com	11/14/2022

INTRODUCTION:

On November 1, 2022, staff from U.S. Environmental Protection Agency (EPA) Region 1 and EPA's contractors, PG Environmental (PG) and ERG (the EPA Inspection Team), conducted a Compliance Evaluation Inspection (CEI) at Kazanjian Used Auto Parts located in Lowell, Massachusetts, Middlesex County (the Facility). Ms. Kelly Davis of ERG presented her Clean Water Act (CWA) inspector credentials to the Parts Manager, Mr. Arthur Daunais (Facility Representative), upon arrival at the Facility. Ms. Forsmark (PG) and Ms. Davis then conducted an opening conference with Mr. Arthur Daunais.

The EPA Inspection Team explained 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 (MSGP). At the time of the inspection, the Facility did not have coverage under the 2021 MSGP. The Facility representative presented the EPA Inspection Team with a Stormwater Pollution Prevention Plan (SWPPP), dated December 29, 2008. Within the SWPPP was a Notice of Intent (NOI) filed with EPA on January 29, 2009 for coverage for the 2008

MSGP which expired September 29, 2013 (NPDES ID. MAR05D181). The Facility Representative did not have records showing that the Facility's MSGP coverage continued beyond the 2008 MSGP.

Weather conditions at the time of the inspection were cloudy with light rain and a temperature of approximately 59°F. According to precipitation data from the National Oceanic and Atmospheric Administration (NOAA), the Lowell, MA area did not report any precipitation the day of the inspection.

ATTACHMENTS:

Appendix A – Photograph Log
Appendix B – Exhibit Log

FINDINGS AND OBSERVATIONS:

Facility Description

The Facility, operated by Kazanjan Used Auto Parts Inc., is a used vehicle auto parts salvage yard that dismantles end-of-life vehicles, stores and resells viable parts, crushes vehicle bodies, and transports crushed vehicle bodies and unsellable parts to a third-party metal recycling disposal facility. The Facility representative stated that the Facility began operations in 1992 and, at the time of the inspection, had a full-time staff of approximately 3. According to the Facility's 2008 SWPPP, the Facility is primarily engaged in industrial activity classified under Standard Industrial Classification (SIC) Code 5015 (Automobile Salvage Yard) and secondarily classified under 5093 (Scrap and Waste Materials).

The Facility comprises approximately one acre located on Dutton Street in the City of Lowell, Middlesex County, Massachusetts (refer to Appendix A, Photographs 1 and 2). The Facility is bordered by Dutton Street to the south, Cushing Street to the north, Wamesit Court to the west, and a private business to the east. The Facility includes three buildings including the office and parts storage area and two garages (the southern garage and western garage) for vehicle dismantling and maintenance of Facility equipment. Automotive fluid and parts are removed and stored inside the garages.

The Facility accepts end-of-life vehicles from commercial and public sources for dismantling and resale of viable parts. Upon arrival, incoming vehicles are taken inside one of the two garages where fluids are drained (antifreeze, oil, gasoline, transmission fluid, wiper fluid, etc.), batteries are removed, and vehicles are inventoried before being stored in the yard (refer to Appendix A, Photographs 3 through 6).

The Facility's yard occupies the western half of the property and is used to store vehicle hulks, parts, and the Facility's crusher. The Facility stores used oil in the southern garage, antifreeze and gasoline are stored outside the office, under cover, until a third party comes to collect and dispose of all fluids (refer to Appendix A, Photographs 7 and 8). Used batteries were stored uncovered and without secondary containment on a wooden pallet in the yard (refer to Appendix A, Photograph 9). Engines and transmissions are stored inside the office for resale, if viable. The Facility also stores mercury switches inside the office and mails them to Massachusetts Department of Environmental Protection (MassDEP).

"End of life vehicles" (ELVs) are processed and stored outdoors in the Facility's northern corner. The Facility has an onsite crusher, and a third-party contractor comes to the Facility to transport vehicles offsite to an

approved recycler following crushing (refer to Appendix A, Photograph 10). The Facility stores all vehicles outside in the yard, in the eastern half of the facility, including newly received vehicles, vehicles waiting to be crushed, and the crushed vehicles.

Facility Drainage Systems and Discharges

Most of the Facility is paved with asphalt or concrete, thereby creating an impervious surface for stormwater runoff. According to a Stormwater Mitigation Detail (facility diagram contained in the 2008 SWPPP) and visible observations, the majority of stormwater runoff at the Facility is conveyed southeast towards three (3) onsite trench drains that are directly connected to a sediment tank which discharges into three (3) underground holding tanks (refer to Appendix A, Photographs 11 through 13). The holding tanks then overflow into the sewer system that runs along Dutton Street. The EPA Inspection Team asked the Facility representative about maintenance of the onsite stormwater system and the Facility representative stated he was unaware of the system.

The EPA Inspection Team observed a storm drain at the entrance to the yard along Dutton Street (refer to Appendix A, Photograph 14). The Facility representative stated he was unaware of the storm drain and did not know if it was connected to the City of Lowell, Massachusetts' Municipal Separate Storm Sewer System (MS4). The EPA Inspection Team measured the distance from the entrance to the Facility's yard to the Pawtucket canal, the nearest surface water body, located southeast of the Facility; the measured distance is approximately 350 feet (refer to Appendix A, Photographs 15 and 16).

On December 13, 2022, the EPA Inspection Team contacted the City of Lowell's Engineering Manager, Mike Stuer, regarding the storm drain observed at the entrance to the yard along Dutton Street. Mr. Stuer confirmed that the storm drain is connected to a 12-inch combined sewer line in Dutton Street and that the sewer line

conveys flow through Lowell's combined sewer system to the Duck Island WWTF (refer to Appendix B, Exhibit 1).

Observations

- At the time of the inspection, the EPA Inspection Team observed the Facility's maintenance and storage garages located in the western portion of the Facility's yard. The garages are the primary indoor waste fluid storage location.
- Outside the dismantling garage, the EPA Inspection Team observed one single walled 120-gallon gasoline tank and one single walled 150-gallon antifreeze tank under a cover but without secondary containment (refer to Appendix A, Photograph 7).
- Adjacent to the gasoline and antifreeze tanks, the EPA Inspection Team observed used car batteries without cover or secondary containment (refer to Appendix A, Photograph 9).
- The EPA Team observed the three (3) trench drains in the yard which, according to Facility representatives, drain to a sediment tank and then three (3) underground storage tanks that overflow to municipal infrastructure in the street (refer to Appendix A, Photographs 11 through 14).
- The EPA Inspection Team observed the graded Facility entrance off Dutton Street and a storm drain at the entrance (refer to Appendix A, Photographs 2 and 12).
- The EPA Inspection Team observed multiple vehicles stored throughout the lot including vehicles waiting to be dismantled and crushed vehicles waiting to be transported offsite to a recycler (refer to Appendix A, Photographs 3, 4, 5, and 10).
- The EPA Inspection Team walked across Dutton Street to the Pawtucket Canal to observe the facility from the location of the nearest surface water (refer to Appendix A, Photographs 15 and 16).

AREAS OF CONCERN:

At the time of the inspection, the EPA Inspection Team identified the following at the Facility:

1. Petroleum sheen was observed on the impervious ground in the northern area of the Facility (refer to Appendix A, Photograph 17).
2. Batteries were observed stored outside on wood pallets without any cover or secondary containment (refer to Appendix A, Photograph 9).
3. A black vehicle observed in the yard contained fluids inside the engine coolant reservoir (refer to Appendix A, Photograph 6).
4. The battery had not been removed from a blue vehicle in the northwest corner of the yard. This vehicle did not have a hood and the battery was exposed to stormwater (refer to Appendix A, Photograph 18).

CLOSING:

At the conclusion of the inspection, the EPA Inspection Team held a closing conference with the Facility representative and discussed the preliminary findings and observations of the inspection. The EPA Inspection Team reiterated that all observations were preliminary and not compliance determinations. The closing conference began at 11:55 AM (EDT) and concluded at approximately 12:05 PM (EDT).