

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	08/13/2024	
Media Program:	Water	
Regulatory Program(s)	NPDES Stormwater/CWA 402	
Company Name:	Jm Salvage, L.L.C.	
Facility Name:	Myers Auto Salvage	
Facility Physical Location:	24132 State Highway 64	
(city, state, zip code)	Canton, TX 75103-6185	
Mailing address:	24132 State Highway 64	
(city, state, zip code)	Canton, TX 75103-6185	
County/Parish:	Van Zandt	
Facility Phone Number	(903) 370-8641	
Facility Contact:	Mr. Joey Myers	Owner
	joeyjr@myersautosalvage.com	
FRS Number:	N/A	
Identification/Permit Number:	TXR05FE54	
Media Identifier Number:	N/A	
NAICS:	423140	
SIC:	5015	
Personnel participating in inspection:		
Sharron A. Crayton	6EN-WS	Inspector/Enforcement Officer
EPA Lead Inspector	<i>Sharron A. Crayton</i>	
Signature/Date	Sharron A. Crayton	10/08/2024
		Date
Supervisor		
Signature/Date	Ruben Alayon-Gonzalez	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

The U.S. EPA Region 6 inspectors Sharron Crayton and Carol Johnson arrived at the Myers Auto Salvage facility on August 13, 2024, at approximately 9:58 AM for an unannounced Compliance Evaluation Inspection (CEI). The inspectors initially met with Mr. Joey Myers, Owner of Jm Salvage, L.L.C. – Myers Auto Salvage (permittee). The inspectors presented their credentials and informed Mr. Myers that a random stormwater inspection was being performed to determine compliance with the Texas Pollutant Discharge Elimination System (TPDES) program and the Multi Sector General Permit (MSGP), in accordance with the Clean Water Act (CWA). It should be noted that Myers Auto Salvage maintains a TPDES MSGP (TXR05FE54 – Sector M: Automotive Salvage Yards) issued by the Texas Commission on Environmental Quality (TCEQ), effective November 8, 2021, to discharge stormwater associated with industrial activity, via one (1) outfall (001).

This inspection included a review of Myer Auto Salvage’s stormwater pollution prevention plan (SWPPP) and all associated paperwork, as well as a physical on-site inspection of the facility. The inspectors also engaged in telephone discussions with the facility’s environmental consultant, Mr. Jody Walls with Storm Environmental regarding information contained in the SWPPP. Before leaving the site on August 13, 2024, the inspectors conducted a closing conference with Mr. Myers to discuss documents requested by EPA that were not included in the SWPPP, and Areas of Concerns identified during the CEI (as detailed in Section III of this report).

The generation of this report is based on information supplied by Myers Auto Salvage (the permittee), observations made by the inspectors, and records and reports maintained by the permittee and/or provided by the permittee’s environmental consultant (Storm Environmental), the state of Texas, and the U.S. EPA.

FACILITY DESCRIPTION

Myers Auto Salvage is an automotive scrap and recycling business, advertised as a provider of, “high quality new, used, recycled and aftermarket auto parts.” Myers Auto Salvage is located at 24132 State Highway 64, Canton, TX 75103, Van Zandt County (denoted in Aerial Image 1 below). Coordinates to the site are in the vicinity of Latitude 32.54167, Longitude -95.84083. The site discharges to Mustang Creek.



Aerial Image #1: Overall view of Jm Salvage, L.L.C. – Myers Auto Salvage. **Note:** Aerial from Google Maps Imagery, 2024. The latitude and longitude (32.54167 and -95.84083) provided on the MSGP's NOI submitted for TXR05FE54 (see white arrow reflecting coordinates) slightly differs from the actual facility's address (blue arrow and blue boarded area).

Section II - OBSERVATIONS

The following points of discussion are derived from the on-site closing conference and visual observations on August 13, 2024:

1. Mr. Myers was unable to provide a certified, signed, and dated physical copy of the Stormwater Pollution Prevention Plan (SWPPP), an updated material inventory list, and an updated description of significant exposed material for Myers Auto Salvage MSGP (TCEQ permit number: TXR05FE54) at the time of inspection;
2. The non-stormwater certification contained in the plan on-site was incomplete (see additional details in Section III of this report);
3. The October 2021 SWPPP referred to August 2016 throughout the document, but was struck through with handwritten updates of October 2021 (see additional details in Section III of this report);
4. The inspectors observed poor housekeeping, as vehicles were stored haphazardly, some with fluids still in them and the hoods left open; thus, exposing fluids and batteries to stormwater;
5. The inspectors observed a sheen-pooled areas behind and on the side of the main warehouse;

6. The inspector observed Best Management Practices (BMPs) present on-site. Multiple areas of concern (AOCs) were observed as described below in Section III of this report with photos included in Appendix 1; and
7. The rain gauge data contained in the plan was last updated with data from September 2023.

Section III – AREAS OF CONCERN

Areas of concern (AOCs) are derived from on-site observations from the August 13, 2024 Compliance Evaluation Inspection (CEI) and from documents provided electronically by Mr. Jody Walls on August 22, 2024.

The following AOCs are derived from the August 13th CEI on-site observations:

Upon reviewing the SWPPP, it was found to be incomplete:

1. In accordance with **TPDES General Permit TXR050000, Part III, Section A(1)(a)**, the SWPPP is not properly signed/certified. In addition, the inspectors were unable to confirm if the plan was revised and updated to accurately reflect current conditions at the site. *Note:* The Notice of Intent (NOI) was submitted and approved by TCEQ on November 8, 2021.
2. Specifically, the following AOCs were noted:
 - a. There were handwritten changes to the material inventory list and description of significant exposed material;
 - b. There were handwritten changes without any date references to the Pollution Prevention Team; and
 - c. The inspector was unable to determine the completion date of the post spill response procedure, which was referenced in the plan. A date of August 2016 was typed, but was scratched through and the word “Completed” was inserted (handwritten).
3. Within 180 days of filing an NOI for coverage (or a renewal NOI) the permittee shall conduct a survey of potential non-stormwater sources and shall provide the certification. The non-stormwater certification contained in the plan on-site was incomplete. Specifically, there was no printed name and/or title identifying the responsible official signing the document. In addition, there was no telephone number provided and the signature was not legible to help identify the name of the person signing the certification. Furthermore, there were two (2) dates handwritten on the certification page. A (typed) date of August 15, 2016 was reflected as the initial certification date, and October 19, 2021 was inserted underneath the 2016 date. The inspectors were unable to confirm, via discussions with the permittee if a new survey was conducted, prior to submitting the November 8, 2021 NOI. **TPDES General Permit TXR050000, Part III, Section B(1)(b)**
4. Pollution Prevention Team Members and their responsibilities were not updated in the SWPPP. Specifically, the name of the team member responsible for assisting with sampling, inspections, spill response and maintenance was struck through with no updated name. In addition, the telephone number for the environmental consultant was changed, but there was no date noting the change. **TPDES General Permit TXR050000, Part III, Section A (2)(a) and (b)**
5. The MSGP requires the facility to maintain an on-site rain gauge, a representative weather station, or an alternative means of compliance (subject to TCEQ’s approval) to determine when a qualifying storm event occurs, and must be monitored a minimum of once per week, and once per day during storm events. No rain gauge data was available and/or provided for October - December 2023. **TPDES General Permit TXR050000, Part III, Section D(1)(c)**
6. Poor Good housekeeping (See Appendix 1, Photograph Log, Photo Nos. 5-27):

- a. Vehicles were improperly stored: hoods left up with fluid inside so that they were exposed to stormwater (See Appendix 1, Photograph Log, Photo Nos. 1-4). **TPDES General Permit TXR050000, Part V, Section M(2)(d)(2) and M(2)(e)**
- b. Open-topped drums containing oily water were present on-site and oily-stained absorbent booms were present near an area pooled with hydrocarbon liquids/water. The oily-stained area located immediately at the entrance of the Dismantling area was referenced in past quarterly inspections conducted by the permittee's environmental consultant dating back to February 2022. Specifically, the area has been captured as an "area needing attention for next period" in the following quarterly inspection reports: February 2, 2022; July 29, 2022; October 3, 2023; January 18, 2024; and April 29, 2024. It was further noted that adequate/proper clean-up efforts for this area have remained incomplete and unresolved, at a minimum, for 30 months (See Appendix 1, Photograph Log, Photo Nos. 15-17) **TPDES General Permit TXR050000, Part III, Section (A)(4)(b)**
- c. Drums, and other containers were not properly labeled (See Appendix 1, Photograph Log, Photo No. 23). **TPDES General Permit TXR050000, Part III, Section (A)(4)(f)(3)**

The following AOC is derived from SWPPP documentation, which was provided via email by Mr. Jody Walls on August 22, 2024:

1. After review of information electronically provided by Mr. Walls, it was noted that in addition to missing rain gauge data for the months of October - December 2023, there was no rain gauge data available and/or provided for February and March 2024. **TPDES General Permit TXR050000, Part III, Section D(1)(c)**

Section IV – FOLLOW UP

The following information was received by the EPA, on August 22nd, after leaving the site on August 13, 2024:

- Upon request, Mr. Jody Walls, Environmental Consultant with Strom Environmental, via email, provided information including, but not limited to the following:
 - An electronic copy of the October 19, 2021 SWPPP which included: 1) a certified, signed, and dated copy of the SWPPP and other applicable plan components (i.e., an updated material inventory list, an updated description of significant exposed material, and updated information regarding the facility's Pollution Prevention Team);
 - Rain Gauge Data for January, March, April, June, July, and August 2024; and
 - A completed non-stormwater certification dated October 19, 2021.

Section V – LIST OF APPENDICES

Appendix 1: Photograph Log – 27 photos taken 08/13/2024

Appendix 1

Photograph Log



Jm Salvage, L.L.C. – Myers Auto Salvage
TPDES MSGP #: TXR05FE54
Inspection Date: 08/13/2024

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 1

Location: Myers Auto Salvage Storage Yard

City: Canton

County: Van Zandt

State: TX



Description: View, of improperly stored vehicle located in auto salvage yard, with hood left up and fluid inside container and exposed to stormwater (red arrow). Closer views provided in following photo #2.

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 2

Location: Myers Auto Salvage Storage Yard

City: Canton

County: Van Zandt

State: TX



Description: Closer view, of improperly stored vehicle located in auto salvage yard, with hood left up and fluid inside container and exposed to stormwater (red arrow). Also note cap for the fluid's container was not fully closed, thus allowing the potential for stormwater to enter the container and potentially overspilling to the ground (see green arrow).

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



Jm Salvage, L.L.C. – Myers Auto Salvage
TPDES MSGP #: TXR05FE54
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 3

Location: Myers Auto Salvage Storage Yard

City: Canton

County: Van Zandt

State: TX



Description: View, of improperly stored vehicle located in auto salvage yard, with no hood remaining and fluid inside container and exposed to stormwater (red arrow). Closer views provided in following photo #4.

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 4

Location: Myers Auto Salvage Storage Yard

City: Canton

County: Van Zandt

State: TX



Description: Closer view, of improperly stored vehicle located in auto salvage yard, with no hood remaining and fluid inside container and exposed to stormwater (red arrow). Also note cap for the fluid's container was not fully closed, thus allowing the potential for stormwater to enter the container and potentially overspilling to the ground (see green arrow).



Jm Salvage, L.L.C. – Myers Auto Salvage
TPDES MSGP #: TXR05FE54
Inspection Date: 08/13/2024

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 5

Location: Dismantling Area

City: Canton

County: Van Zandt

State: TX



Description: View, of Myers Auto Salvage's Dismantling Area, not maintained in an effective operating condition (e.g., poor housekeeping). Closer views to follow.

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 6

Location: Dismantling Area

City: Canton

County: Van Zandt

State: TX



Description: Closer view, of Myers Auto Salvage's Dismantling Area, not maintained in effective operating condition (e.g., poor housekeeping as reflected by rusty-discolored staining of the soil).

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 7

Location: Dismantling Area

City: Canton

County: Van Zandt

State: TX



Description: Closer view, of Myers Auto Salvage's Dismantling Area, not maintained in an effective operating condition (e.g., poor housekeeping).

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 8

Location: Dismantling Area

City: Canton

County: Van Zandt

State: TX



Description: Closer view, of Myers Auto Salvage's Dismantling Area, not maintained in an effective operating condition (e.g., poor housekeeping). While this area is located under a covered shed, it should be noted that due to heavy, oily staining in the immediate area, as well as observed standing water as reflected in photos #5, #6, and #7 the potential to impact stormwater runoff is possible. Closer view of drum reflected by red arrow captured in photo #9.

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 9

Location: Dismantling Area

City: Canton

County: Van Zandt

State: TX



Description: Closer view, of Myers Auto Salvage’s Dismantling Area, not maintained in effective operating condition (e.g., poor housekeeping). The facility is not properly managing and/or storing used oil. Specifically, there was oil just below the rim of this drum, which was modified by cutting/carving out a section of the top to pour oil in the container. Other small equipment/material was observed sitting on top of the drum with no safeguards of preventing the items to fall into the oily drum.

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

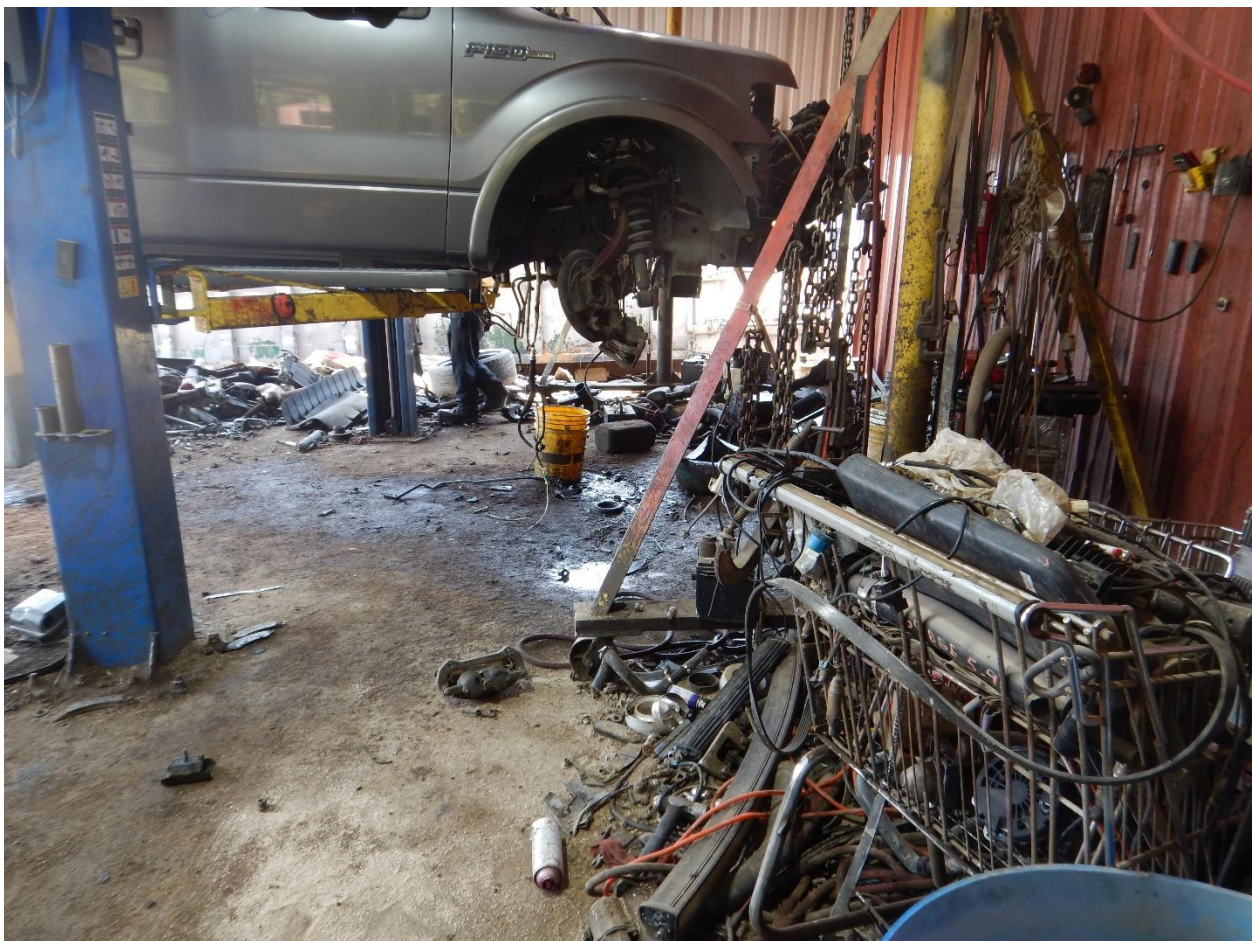
Photo No. 10

Location: Dismantling Area

City: Canton

County: Van Zandt

State: TX



Description: Closer view, of Myers Auto Salvage's Dismantling Area, not maintained in effective operating condition (e.g., poor housekeeping). While this area is located under a covered shed, it should be noted that due to heavy, oily staining in the immediate area, as well as observed standing water as reflected in photos #5 and #6, the potential to impact stormwater runoff is possible.

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 11

Location: Dismantling Area

City: Canton

County: Van Zandt

State: TX



Description: Closer view, of Myers Auto Salvage's Dismantling Area, not maintained in an effective operating condition (e.g., poor housekeeping). While this area is located under a covered shed, it should be noted that due to heavy, oily staining in the immediate area, the potential to impact stormwater runoff is possible. Closer view of pooled water reflected by red arrow captured in photo #12.

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 12

Location: Dismantling Area

City: Canton

County: Van Zandt

State: TX



Description: Closer view, of Myers Auto Salvage's Dismantling Area, not maintained in an effective operating condition (e.g., poor housekeeping). The facility is not properly and/or timely responding to clean ups efforts associated with spills. Specifically, there was oily water settled in a pitted area. While the area is covered, there is an open space just above the area, which has the potential to allow stormwater, via windrift to enter the area and ultimately drain to the soil area immediately at the mouth of the dismantling area.

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 13

Location: Dismantling Area

City: Canton

County: Van Zandt

State: TX



Description: Closer view, of Myers Auto Salvage's Dismantling Area, not maintained in an effective operating condition (e.g., poor housekeeping). Note: hydrocarbon sheen contained in pitted area (also reflected in photo #12). Closer view of green and blue arrowed areas captured in photos #14 and #15, respectively.

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 14

Location: Dismantling Area

City: Canton

County: Van Zandt

State: TX



Description: Closer view, of Myers Auto Salvage's Dismantling Area, not maintained in an effective operating condition (e.g., poor housekeeping). Note: hydrocarbon sheen contained in pitted area (also reflected in photo #13, see green arrow).

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 15

Location: Area Immediately at the Entrance of the Dismantling Area

City: Canton

County: Van Zandt

State: TX



Description: View, immediately at the entrance of the Dismantling Area, not maintained in an effective operating condition (e.g., poor housekeeping). Note: oily-stained absorbent booms and oil-stained soil was observed during the site visit and has been in this condition dating back to February 2022, as noted in the quarterly inspections reviewed. An additional view of the area is captured in photo #16.

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



Jm Salvage, L.L.C. – Myers Auto Salvage
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 16

Location: Area Immediately at the Entrance of the Dismantling Area

City: Canton

County: Van Zandt

State: TX



Description: Closer view, immediately at the entrance of the Dismantling Area, not maintained in an effective operating condition (e.g., poor housekeeping; oily-stained absorbent booms and oil-stained soil).

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 17

Location: Area Immediately at the Entrance of the Dismantling Area

City: Canton

County: Van Zandt

State: TX



Description: Closer view, immediately at the entrance of the Dismantling Area, not maintained in an effective operating condition (e.g., poor housekeeping; oily-stained absorbent booms and oil-stained soil).

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



Jm Salvage, L.L.C. – Myers Auto Salvage
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 18

Location: Outside Storage Area

City: Canton

County: Van Zandt

State: TX



Description: View, of outside storage area behind warehouse, with view drums, windshields, hoods, and other various auto parts. Closer and additional views provided in following photos, and details regarding drums identified by pink and green arrows captured in photos #20 and #21, and #22, respectively.

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 19

Location: Outside Storage Area

City: Canton

County: Van Zandt

State: TX



Description: Closer view, of outside storage area behind warehouse, with view of drums, windshields, hoods, and other various auto parts. Also, note the drain located to the left as reflected by yellow arrow. A closer view is provided in photo #26.

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 20

Location: Outside Storage Area

City: Canton

County: Van Zandt

State: TX



Description: Closer view, of drum identified in photo #18 (identified by pink arrow). Note, the contents of the uncovered drum were hydrocarbons, oily water, and a plastic bucket. It was also noted that the drum was damaged by the presence of a hole on the side, near the top of the drum (see orange arrow).

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 21

Location: Outside Storage Area

City: Canton

County: Van Zandt

State: TX



Description: Additional view, of drum identified in photos #18 and #20.

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 22

Location: Outside Storage Area

City: Canton

County: Van Zandt

State: TX



Description: Closer view, of drum identified in photo #18 (identified by green arrow). Note, the contents of the uncovered drum were oily water. It was also noted that the drum was damaged by the presence of a hole on the side, near the top of the drum (see blue arrow).

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



Jm Salvage, L.L.C. – Myers Auto Salvage
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 23

Location: Outside Storage Area

City: Canton

County: Van Zandt

State: TX



Description: View, of outside storage area behind warehouse, with view additional drums. Note: The uncovered drums were emptied. See photo #24 for closer view and additional discussion regarding drum referenced by blue arrow, which was not labeled.

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 24

Location: Outside Storage Area

City: Canton

County: Van Zandt

State: TX



Description: Closer view, of drum identified by blue arrow in photo #22. Note, the facility is not properly managing and/or storing used oil. Specifically, there was oil/oily water just below the rim of this uncapped drum.

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 25

Location: Outside Storage Area, Door Exiting Parts Storage Area

City: Canton

County: Van Zandt

State: TX



Description: View, of oily-stained area immediately at the door exiting the parts storage area.

Date of Photo: 08/13/2024 **Photographer:** Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 26

Location: Outside Storage Area, Door Exiting Parts Storage Area

City: Canton

County: Van Zandt

State: TX



Description: Additional view, of oily-stained area immediately at the door exiting the parts storage area. Note drainage conveyance, to the north, which flows downstream of the soiled area into a grassy field. Additional view of area captured in photo #27.

Date of Photo: 08/13/2024 Photographer: Sharron Crayton



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 27

Location: Outside Storage Area, Door Exiting Parts Storage Area

City: Canton

County: Van Zandt

State: TX



Description: Additional view, of oily-stained area immediately at the door exiting the parts storage area. Note drainage conveyance, to the north, which flows downstream of the soiled area into a grassy field.

Date of Photo: 08/13/2024 Photographer: Sharron Crayton