

INSPECTION REPORT

Inspection Entry Date/Time	11/20/2024 09:00 AM (PT)	Announced: No	
Inspection Exit Date/Time	11/20/2024 01:25 PM (PT)	Access: Granted	
Weather	55°F, Overcast		
Media	Water		
Statute(s)/Program(s)	Clean Water Act, NPDES, Stormwater – Industrial		
Type of Inspection	Compliance Evaluation Inspection		
Permittee Name	Perlenfein, Inc		
Facility Name	American Auto Salvage		
Facility/Site Physical Address	3000 Main Street		
City, State, Zip Code	Springfield, Oregon 97478		
County	Lane		
Facility GPS Coordinates	44.04584, -122.983041		
FRS ID	110069604556		
Permit Number	ORR803755		
SIC	5015 (Motor Vehicle Parts, used)		
Lead Inspector:			
Raymond Andrews	EPA Region 10	andrews.raymond@epa.gov	(206) 553-4252
Supervisor Review:			
Peter Contreras	EPA Region 10	contreras.peter@epa.gov	(206) 553-6708

SECTION I – Opening Conference

I arrived at the American Auto Salvage (the “Site” or “Facility”), located at 3000 Main Street, Springfield, Oregon, at 09:00 AM (PT) on 11/20/2024 for an unannounced inspection. I presented credentials to Nick Brown and informed him I this was there to conduct an inspection to determine compliance with the Clean Water Act (CWA) and the facility’s Oregon Department of Environmental Quality (ODEQ) 1200-Z permit for industrial stormwater, permit # ORR803755. This report is based on information supplied by Mr. Brown, my direct observations, and records and reports maintained by the permittee. In addition, information gathered prior to or after the Inspection from a review of EPA, State, and/or public records may be included in this report.

Attendees

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA Region 10	Raymond Andrews	Lead Inspector	Yes	Yes
ODEQ	Kathy Jacobsen	Stormwater Specialist	Yes	Yes
American Auto Salvage	Nick Brown	General Manager	Yes	Yes

Facility Information

Responsible Official	Nick Brown
Type of Operation	Auto salvage
Size of Facility Site	2.75 acres
Is property owned or leased?	The property is leased.
Receiving Water	Mill Race Creek
Number of Employees	The facility has 12 employees that work from 8:00am until 4:30pm Monday through Friday.
Type of Materials and/or Vehicles Stored Outdoors	The facility stores used vehicles and auto part outdoors.
Personnel Conducting Inspections/Sampling	Mr. Brown conducts sampling and inspections.
Sampling Locations	The stormwater is sampled on the west side of facility as it exits the transport pipe to flow into Mill Creek.
Number/Location of Outfalls	The facility discharges through a single outfall. The facility has three catch basins, which collect stormwater and are connected in series. The basins are encircled by bio-char bags to reduce the quantity of copper that is discharged. The bio-char bags were implemented as part of the Tier 2 Corrective Action Plan. Once the water reaches a certain level in catch basin 3, the water flows from underground piping to the discharge point.
BMPs/Stormwater Treatment	The facility’s BMPs/Treatment include the three catch basins, bio char booms around catch basins, berms, and site grading to direct the stormwater flow to the catch basins.
Has the facility had any benchmark exceedances in the last 12 months?	At the time of the inspection, Mr. Brown told me he would send to me any copies of benchmark exceedances the facility had within the 12 months prior to the month of inspection. I never received the documents. I sent Mr. Brown an email on 12/09/2024 asking for the information with a follow-up email on 12/12/2024. I never received a response.

Was the Tier 2 Stormwater Treatment Plan implemented?	The plan was implemented. The biochar booms were and an integral part of the of the Tier 2 plan.
Was the Tier 2 Stormwater Treatment Plan effective?	Mr. Brown Does not yet know if the plan is effective because the first sample taken since its implementation was November 20, 2025, the day prior to the inspection, and the results have not been received.
Do you still have a monitoring waiver?	The facility has a monitoring waiver for all parameters except copper.

Location	Description
Discharge/Monitoring Point	The discharge/monitoring point is the point where the pipe carrying stormwater from the catch basin exits the ground and discharges into the receiving water, Mill Race Creek.
Used Vehicle Storage Yard	The primary area of the facility where "waste" cars are stored until disposal.

SECTION II – Observations

Location: Used Vehicle Storage Yard		
Observation #: RA1-OB-001	Date: 11/20/2024	Weather: 55°F, Overcast
At the time of the inspection, I observed two dumpsters in different areas of the yard that were not covered. One of the dumpsters contained miscellaneous items. The second dumpster contained old radiators that had been removed from waste vehicles.		
Photos 1. IMG-2024112012180618695352.jpg 2. IMG-202411201224562456115206.jpg		
Location: Used Vehicle Storage Yard		
Observation #: RA1-OB-002	Date: 11/20/2024	Weather: 55°F, Overcast
At the time of the inspection, I observed two catch basins that were encircled with bio-char bags. The bags were use as Best Management Practices (BMPs) to filter pollutants from the stormwater prior to the water entering the catch basin. The bio-char bags around catch basin 1 had been flattened, were ineffective, and needed replacement/maintenance. The bio-char bags around catch basin 2 were also ineffective and needed replacement/maintenance. (The facility has three catch basins. Catch basin three was properly encircled by the bio-char bags.)		
Photos 1. IMG-20241120121921192196302.jpg 2. IMG-20241120122719271996898.jpg		
Location: Discharge/Monitoring Point		
Observation #: RA1-OB-003	Date: 11/20/2024	Weather: 55°F, Overcast
The site discharges into a ditch through a 6-inch diameter PVC pipe. The ditch flows to the receiving water, Mill Race Creek. At the time of the inspection, the water level in the ditch had almost fully submerged the discharge pipe. The facility could not obtain a representative sample of its discharge due to the discharge mixing with water from other sources.		
Photo 1. IMG-202411201237533753177992.jpg		

SECTION III – Records Review

Records may not be in sequential order.

Record: Other - ODEQ Revised Sampling Waiver Email		AOC: No
Ref #: RA1-RR-007	Reviewed By: Raymond Andrews	Reviewed Date: 12/20/2024
Post inspection, I reviewed the revised monitoring waiver sent by the Oregon Department of Environmental Quality (ODEQ) to the facility, dated October 25, 2023. The revised waiver reinstated the facility's requirement to sample for copper.		
Record: Other - Tier 2 Stormwater Treatment Plan		AOC: No
Ref #: RA1-RR-006	Reviewed By: Raymond Andrews	Reviewed Date: 12/20/2024
Post inspection, I reviewed the facility's Tier 2 Stormwater Treatment Plan (STP), dated January 24, 2023. The STP was created for the facility by Aquarius Environmental, LLC, to address the excessive copper in the facility's discharges as outlined in ODEQ's email from November 16, 2023.		
Record: Other - Email from ODEQ to Facility		AOC: No
Ref #: RA1-RR-005	Reviewed By: Raymond Andrews	Reviewed Date: 12/20/2024
Post inspection, I reviewed an email from Kathy Jacobsen of the Oregon Department of Environmental Quality (ODEQ), dated November 16, 2023. The email informed the facility that the facility was required to meet Tier 2 Corrective Action requirements based on discharge monitoring report (DMR) data for copper from 2021 through 2022.		
Record: Other - Facility Training Records		AOC: No
Ref #: RA1-RR-004	Reviewed By: Raymond Andrews	Reviewed Date: 11/11/2024
At the time of the inspection, I requested to review annual facility training records from 2020 through 2023. The facility provided a sign-in sheet for training conducted in 2020. After 2020, training was tracked electronically. I did not note any areas of concern.		
Record: Other - Visual Monitoring Reports		AOC: Yes
Ref #: RA1-RR-003	Reviewed By: Raymond Andrews	Reviewed Date: 11/20/2024
At the time of Inspections, I requested to review the facility's monthly visual monitoring reports from January 2022 through October 2024. The facility was missing visual monitoring reports for:		
• December 2022 • June 2023 • July 2023 • September 2023 • October 2023 • February 2024 • March 2024 • April 2024 • June 2024 • July 2024 • October 2024		
I told Mr. Brown that reports are required even if there is no discharge and an annotation of "No Discharge" should be made on the report for that month.		
AOC:		
The facility did not have 11 of the 34 visual monitoring reports that were requested.		

Record: Other - Facility Routine Monthly Inspection Reports		AOC: No
Ref #: RA1-RR-002	Reviewed By: Raymond Andrews	Reviewed Date: 11/20/2024
At the time of Inspections, I requested to review the facility's routine monthly inspection reports from January 2022 through October 2024. All the reports were available. I did not note any areas of concern.		
Record: Other - Stormwater Pollution Control Plan (SWPCP)		AOC: Yes
Ref #: RA1-RR-001	Reviewed By: Raymond Andrews	Reviewed Date: 11/20/2024
At the time of inspection, I reviewed the SWPCP, dated October 2024. The cover page of the plan did not have the correct DEQ File # or EPA permit # and was missing the county.		

SECTION IV – Sampling Activity

No sampling was conducted.

SECTION V – Areas of Concern

Areas of Concern may not be in sequential order.

The presentation of Areas of Concern does not constitute a formal compliance determination or violation.

AOC Reference #: RA1-RR-001	Records Review: Other - Stormwater Pollution Control Plan (SWPCP)
Permit Requirement Schedule A10. of the permit states, in part, “a. Title Page - The title page of the SWPCP must contain the following information: v. File number and EPA permit number as indicated in permit coverage documents...”	
AOC: The plan did not have the correct DEQ File # or EPA permit #.	
AOC Reference #: RA1-OB-001	Location: Used Vehicle Storage Yard
Permit Requirement Schedule A.1.c of the permit states, in part, "Cover all waste contained in bins or dumpsters where there is a potential for drainage of stormwater through the waste to prevent exposure of stormwater to these pollutants."	
AOC: At the time of the inspection, I observed two dumpsters in different areas of the yard that were not covered. One of the dumpsters contained miscellaneous items. The second dumpster contained old radiators that had been removed from waste vehicles.	
AOC Reference #: RA1-OB-002	Location: Used Vehicle Storage Yard
Permit Requirement Schedule A.2.a of the permit states, in part, "The permit registrant must select, design, install, implement and maintain control measures, including all best management practices (BMPs)..."	
AOC: At the time of the inspection, I observed two catch basins that were encircled with bio-char bags. The bags were use as Best Management Practices (BMPs) to filter pollutants from the stormwater prior to the water entering the catch basin. The bio-char bags around catch basin 1 had been flattened, were ineffective, and needed replacement/maintenance. The bio-char bags around catch basin 2 were also ineffective and in need of replacement/maintenance.	

AOC Reference #: RA1-OB-003	Location: Discharge/Monitoring Point
Permit Requirement Schedule B.7.a.i of the permit states, "Samples must be representative of the discharge."	
AOC: The site discharges into a ditch through a 6-inch diameter PVC pipe. The ditch flows to the receiving water, Mill Race Creek. At the time of the inspection, the water level in the ditch had almost fully submerged the discharge pipe. The facility could not obtain a representative sample of its discharge due to the discharge mixing with water from other sources.	
AOC Reference #: RA1-RR-003	Records Review: Other - Visual Monitoring Reports
Permit Requirement Schedule B.12.c of the permit states, in part, "Conduct visual inspections at the site on a monthly basis when the facility is in operation."	
AOC: The facility did not have 11 of the 34 visual monitoring reports that were requested.	

SECTION VI – Closing Conference

I held a closing conference with Facility personnel at 01:25 PM (PT) on 11/20/2024 for the inspection. During the closing conference, I discussed my observations and Areas of Concern I identified during the inspection. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination.

SECTION VII – List of Appendices

1. Photo Log

APPENDIX 1: Photo Log



Down Grade			IMG-2024112012170517598656.jpg
11/20/2024 12:17 PM (PT)	No CBI	No PII	Photographer: Raymond Andrews
Used Vehicle Storage Yard			44.04592866, -122.98459158
Yard with slight down slope to north.			



Dumpster 1			IMG-2024112012180618695352.jpg
11/20/2024 12:18 PM (PT)	No CBI	No PII	Photographer: Raymond Andrews
Used Vehicle Storage Yard			44.04592389, -122.98461136
Uncovered dumpster containing miscellaneous items.			



Catch Basin 1			IMG-20241120121921192196302.jpg
11/20/2024 12:19 PM (PT)	No CBI	No PII	Photographer: Raymond Andrews
Used Vehicle Storage Yard			44.04588319, -122.98471248
Catch basin 1 with biochar filter bag showing lack of maintenance. Need replacing.			



Dumpster 2			IMG-202411201224562456115206.jpg
11/20/2024 12:24 PM (PT)	No CBI	No PII	Photographer: Raymond Andrews
Used Vehicle Storage Yard			44.04595495, -122.98464505
Uncovered dumpster containing old radiators.			



Catch Basin 2			IMG-20241120122719271996898.jpg
11/20/2024 12:27 PM (PT)	No CBI	No PII	Photographer: Raymond Andrews
Used Vehicle Storage Yard			44.04603593, -122.98493034
Catch basin 2 with biochar bags. Requires maintenance. The bags are ineffective in lower right corner.			



Catch basin 3			IMG-20241120123201321198184.jpg
11/20/2024 12:32 PM (PT)	No CBI	No PII	Photographer: Raymond Andrews
Vegetated area near outfall.			44.0460117, -122.98489131
Catch basin 3 in good repair.			



Discharge Point			IMG-202411201237533753177992.jpg
11/20/2024 12:37 PM (PT)	No CBI	No PII	Photographer: Raymond Andrews
Discharge/Sampling Point			44.04587403, -122.9858689
The facility cannot acquire a representative sample due to the discharge pipe being partially submerged. Water discharges into a ditch which flows to Mill Race creek.			