



NPDES Compliance Inspection Report

LKQ Barger Auto Parts – Caldwell Caldwell, Idaho

Permit #: IDR05J00P

Inspection Date: May 11, 2021

Prepared by:

Raymond Andrews
U.S. Environmental Protection Agency, Region 10
Enforcement & Compliance Assurance Division
Water Enforcement & Field Branch
Field, Data & Drinking Water Enforcement Section

Signature/Date:

Andrews, Raymond L. Digitally signed by Andrews, Raymond L.
Date: 2021.06.23 07:47:46 -07'00'

Supervisor Signature/Date:

PETER CONTRERAS Digitally signed by PETER CONTRERAS
Date: 2021.06.23 11:24:48 -07'00'

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(All details in this report were obtained through conversations with Mr. Matt Davis, Mr. Daniel Martin, and Mr. Timothy Klein, or from observations made during the inspection.)

I. Facility Information

Facility Name: LKQ Barger Auto Parts – Caldwell

Facility Owner/Operator: LKQ Corporation

Physical Address: 6423 Cleveland Boulevard
Caldwell, Idaho 83607

Lat/Long: 43.62419, -116.62947

Mailing Address: 6423 Cleveland Boulevard
Caldwell, Idaho 83607

NAICS Code: 423140 (Motor Vehicle Parts (Used) Merchant Wholesalers)

SIC Code: 5015 (Motor vehicle parts, used)

Facility Contacts:

Matt Davis
Plant Manager
Office Phone: 208-297-3655
Cell Phone: 530-949-8970
Email: mcdavis@lkqcorp.com

Daniel Martin
Operations Manager
Office Phone: 208-318-2051
Cell Phone: 843-373-2423
Email: dmartin@lkqcorp.com

Timothy Klein
Environmental Compliance Manager
Office Phone: 858-375-7115
Cell Phone: 858-997-4939
Email: taklein@lkqcorp.com

Permit Number: IDR05J00P

Receiving Water: Indian Creek

II. Inspection Information

Inspection Date: May 11, 2021

Inspectors: Raymond Andrews, Inspector
EPA Region 10, ECAD /FDDWES
Phone: 206-553-4252

Arrival Time: 9:45 AM

Departure Time: 2:00 PM

Weather: Sunny, 51°F

Purpose: To determine facility compliance with the National Pollutant Discharge Elimination System (NPDES) permit and the Clean Water Act.

III. Permit Information

LKQ Barger Auto Parts – Caldwell (“Facility”) is permitted under the National Pollutant Discharge Elimination System’s (NPDES) Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP). The MSGP became effective on August 12, 2015, and expired on June 4, 2020. The facility certified a Notice of Intent (NOI) for coverage under the MSGP on January 6, 2020. The facility submitted a NOI recertification on May 7, 2021. The facility is permitted under Sector M (Automobile Salvage Yards) of the MSGP.

IV. Background

LKQ Corporation owns and operates LKQ Barger Auto Parts – Caldwell located at 6423 Cleveland Boulevard, Caldwell, Idaho. On July 1, 2011, LKQ Corporation bought the Caldwell facility. The facility operated under a “No Exposure Certificate” until 2019. In October 2019, the facility began the process of attaining coverage under the MSGP. On January 6, 2020, coverage under the MSGP began.

On March 12, 2021, the Environmental Protection Agency (EPA) conducted a desk audit of the facility. No further actions were taken as a result of the desk audit.

V. Inspection Chronology

This was an unannounced inspection.

I conducted an opening conference, which included an interview of the facility representatives, followed by a records review, a site inspection, and a closing conference.

VI. Opening Conference

I arrived at the facility at 9:45am. I presented my credentials to Mr. Matt Davis, Plant Manager, Mr. Daniel Martin, Operations Manager, and Mr. Timothy Klein, Regional Environmental Program Manager, henceforth, collectively referred to as “the Representatives.” I provided a copy of the EPA Small Business Resource Sheet to Mr. Davis.

I explained the purpose of the inspection was to determine the facility’s compliance with the MSGP and the Clean Water Act (CWA).

The following information was collected through conversation with the Representatives.

The facility operates Monday through Friday from 7:00am to 5:30pm, and employs approximately 7 full time personnel.

The facility is an automobile recycling operation. It sells used auto parts reclaimed from junked cars.

The facility’s site covers approximately 11.9 acres with 11.5 acres ($\approx 97\%$) exposed to direct precipitation. The remaining 3% is covered by structures. Approximately 1.1 acres ($\approx 10\%$) of the ground surface is impervious to rainfall. The site’s surface is composed of a combination of dirt, gravel, and asphalt. Per www.usclimatedata.com, the average annual precipitation received by Caldwell, Idaho is 11.45 inches with no more than one to two inches within a 24-hour period.

The facility has three outfalls, labeled 001 through 003. Outfalls 001 and 002 are sampled regularly. Outfall 003 has yet to be sampled because it has not had a discharge since MSGP coverage began. Stormwater that discharges from the facility enters the City of Caldwell’s Municipal Separate Storm Sewer System (MS4). Once the stormwater enters the MS4, it flows to Indian Creek, which is approximately a third of a mile from the facility. Indian Creek is a tributary of the Boise River. The facility does not have any non-stormwater discharges.

The southeastern half of the site slopes south to southwest towards Cleveland Boulevard. The western portion of the site slopes south and slightly west. The northeastern portion of the site generally slopes northeast. The site is divided into three drainage areas. The different drainage areas are delineated on the facility diagram found in Appendix A.

Drainage area one flows towards Outfall 001 in the southeastern corner of the parking lot. This drainage area includes the office building, the dismantling building, the parts storage warehouse, and the fueling area.

Drainage area two flows towards Outfall 002 in the western segment of the site. This drainage area includes the vehicle holding area.

Drainage area three flows towards Outfall 003 in the northeastern corner of the site. This drainage area includes the vehicle storage yard, car crusher, and the retention basin.

The facility’s activities can be categorized as indoor activities and outdoor activities.

Indoor Activities

Any activity that could release vehicle fluids is conducted in the dismantling building to minimize the potential for exposure of those fluids to precipitation. For example, the facility removes engines, transmissions, and all other fluid containing parts, in the maintenance building. All vehicle cleaning and washing is also conducted in the maintenance building.

Outdoor Activities

The only activities conducted outside at the site are junk vehicle storage and the removal of fluid free parts such as doors, hoods, and windshields.

The MSGP requires the facility to conduct routine facility inspections quarterly at a minimum. Those inspections are conducted by Mr. Martin.

VII. Laboratory Analysis

The facility is required to monitor for the general effluent parameter of phosphorus (Ph), the sector specific parameters of total suspended solids (TSS), total aluminum (Al), total iron (Fe), and total lead (Pb), and the impaired water parameter of *Escherichia coli* (*E. coli*). Water samples are collected by Mr. Martin.

All parameters are analyzed by:

Analytical Labs, Inc.
1804 North 33rd Street
Boise, Idaho 83703
(208) 342- 5515

VIII. File Review

The Permit requires that documentation be retained for a minimum of three years.

I reviewed the following records and documents:

- Stormwater Pollution Control Plan (SWPPP), dated September 24, 2019
- Monthly Facility Inspection Reports – March 2019 through April 2021
- Chain-of-Custody Documents – March 2019 through April 2021
- Discharge Monitoring Reports (DMRs) – March 2019 through April 2021
- Employee Training Records – March 2019 through April 2021
- Notice of Intent (NOI) – Initial applicated, dated January 6, 2020
- Notice of Intent (NOI) – Recertification, dated May 7, 2021

IX. Site Inspection

Appendix A contains an aerial photo of the site, provided by Google Maps, and a site diagram, provided by the facility. **Appendix B** contains the photographs used in this inspection report and a complete photo log.

Following the records review, the Representatives and I walked outside so I could conduct the site inspection.

We exited the office into the facility parking lot which is located on the southwestern side of the property adjacent to Nampa-Caldwell Boulevard. The parking lot is sloped towards the boulevard. Facing southwest, two storm drains (**Photos 1 & 2**) are located near the boulevard on the right and left edges of the property. Both storm drains empty into the City's MS4 system. The storm drain on the left (**Photo 2**) is labeled as Outfall 001/Sampling Point 1. During rainfall events, a water sample is collected through sheet flow prior to the water entering the drain.

We proceeded to the vehicle storage yard which occupies the northwestern portion of the facility. The storage yard is sloped toward the northwest so storm water sheet flows into a rock lined ditch (**Photo 3**) which slopes toward the retention basin (**Photo 4**). The upper bank of the retention basin is covered by a liner to reduce the potential for erosion. Facing northeast, Outfall 003/Sampling Point 3 is located on the upper left end of the retention pond. Per the Representatives, there has never been a need to sample Sampling Point 3 because there had never been a discharge due to the low average annual rainfall. The Representatives also said the retention pond is dredged out annually at the end of summer to facilitate stormwater infiltration.

We walked in a southwestern direction to Outfall 002/Sampling Point 2 (**Photos 5 & 6**). Sampling point 2 receives stormwater from the vehicle holding area. Outfall 002 is enclosed on the uphill side by sandbags. The stormwater enters the rock-filled pit of Outfall 002 and enters a manhole. The manhole has a hose that travels underground to another manhole. Stormwater samples are collected from the hose in the second manhole.

From Outfall 002, we headed back towards the dismantling building and office. On the northwest end of the dismantling building was a pair of double-walled tanks (**Photo 7**) seated on top of secondary containment. The tanks held used oil and anti-freeze that was collected from dismantled vehicles. The Representatives said the tanks were pumped out by a contractor as need and the contents hauled offsite for disposal. Beside the tanks was a 3-chamber oil/water separator (**Photo 8**) which received water from the dismantling building. The chamber closest to the building receives the contaminated water, starts the separation process, and traps most of the sludge. The middle chamber continues the separation of the oil and water. The chamber furthest from the building contains the clean water. The contents of the chambers are pumped out three to four times a year and hauled away for disposal.

The final observation I made on the walk back to the office was a storm drain (**Photo 9**) situated between the dismantling building and the office. The storm drain receives water from the local surrounding area. The Representatives said the storm drain sequesters stormwater in a self-contained catch basin. The basin is pumped out twice a year and the contents hauled offsite for disposal by a contractor.

X. Areas of Concern

I noted the following area of concern:

A. Routine Facility Inspections

Part 3.1 of the MSGP states, in part, “During normal facility operating hours you must conduct inspections of areas of the facility covered by the requirements in this permit...” and “Inspections must be conducted at least quarterly (i.e., once each calendar quarter)...”

At the time of the inspection, I reviewed routine facility inspections from March 2019 through April 2021. The routine facility inspection report for the 3rd quarter of 2020 was unavailable for review.

B. SWPPP

Part 5.2.5.1 of the MSGP states that the SWPPP must document “a schedule or the convention used for determining when pickup and disposal of waste materials occurs.”

At the time of the inspection, I reviewed the SWPPP and found that it did not include a schedule for the pickup and disposal of waste materials.

C. Chain of Custody Documents

Appendix B.10.D states, “Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in the permit.”

Table II of 40 CFR Part 136 requires that water samples be cooled to <10 °C.

At the time of inspection, I reviewed laboratory chain of custody documents for stormwater samples submitted between March 2019 and April 2021. The chain of custody document for May 14, 2020, did not annotate the temperature of the water sample upon receipt by the laboratory.

XI. Closing Conference

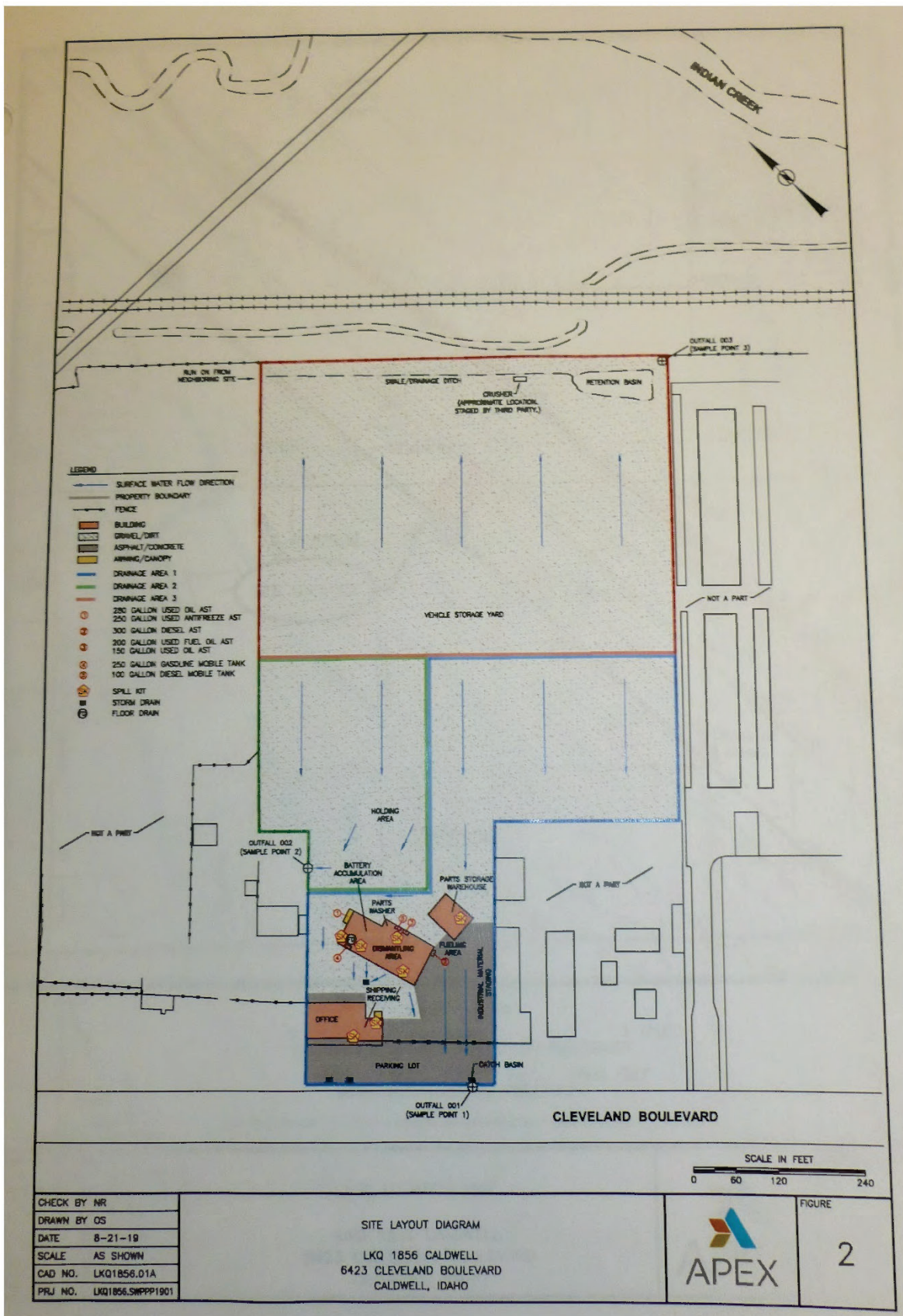
On May 11, 2021, I held a closing conference with Mr. Davis, Mr. Martin, and Mr. Klein. We discussed my observations and I answered all their questions. I gave a brief overview of the post-inspection process. I then thanked them for their time and assistance and departed the facility.

APPENDIX A

Aerial Image of Site Provided by Google Maps



Site Diagram Provided by Facility



APPENDIX B

Inspection Photographs and Photograph Log

(Photographs taken by Ray Andrews on May 11, 2021 with a Panasonic DMC-FH25 camera)



Photo 1 / P1000880 – Storm Drain, parking lot



Photo 2 / P1000882 – Storm Drain/Sampling Point 1



Photo 3 / P1000888 – Rock-lined Ditch



Photo 4 / P1000887 – Retention pond, with liner

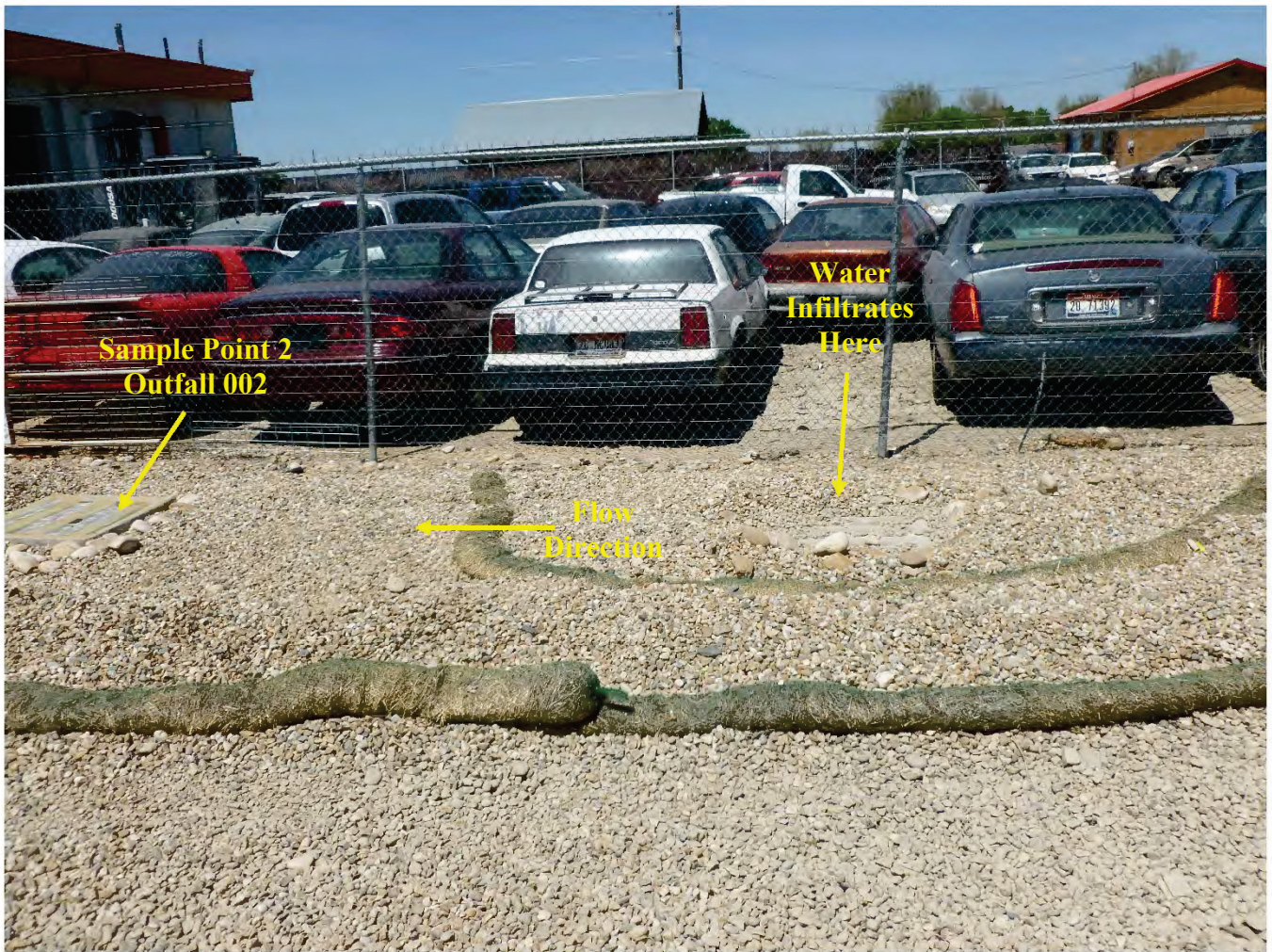


Photo 5 / P1000890 – Sample Point 2, wide view



Photo 6 / P1000889 – Sample Point 2, close up



Photo 7 / P1000891 – Used Oil & Antifreeze Tanks



Photo 8 / P1000892 – 3 Chamber Oil/Water Separator



Photo 9 / P1000883 – Storm Drain, to catch basin

Complete list of photographs taken during the inspection:

- P1000872 – SWPPP, binder cover
- P1000873 – NeT email
- P1000874 – Additional Monitoring Requirements Letter, front page
- P1000875 – Additional Monitoring Requirements Letter, back page
- P1000876 – SWPPP, 1.5 Facility Contacts and Responsible Parties
- P1000877 – Map, site location
- P1000878 – Map, site layout
- P1000879 – Training Roster, December 16, 2020
- P1000880 – Storm Drain, parking lot
- P1000881 – Storm Drain, parking lot, close up
- P1000882 – Storm Drain/Sampling Point 1
- P1000883 – Storm Drain, to catch basin
- P1000884 – Bucket Loader, with drip pans
- P1000885 – Retention Pond, wide shot
- P1000886 – Retention Pond, close up
- P1000887 – Retention pond, with liner
- P1000888 – Rock-lined Ditch
- P1000889 – Sample Point 2, close up
- P1000890 – Sample Point 2, wide view
- P1000891 – Used Oil & Antifreeze Tanks
- P1000892 – 3 Chamber Oil/Water Separator