



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

Date: *Dated as shown on electronic signature(s)*

Subj: Inspection Report
Clean Water Act - National Pollutant Discharge Elimination
System ("NPDES")
Goyette's Inc

From: Damian Bednarz, Inspector

**DAMIAN
BEDNARZ**

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DAMIAN BEDNARZ
Date: 2023.12.21 15:20:38
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Thru: Anna Hatke, Inspector

To: File

I. Facility Information

- A. *Facility Name:* Goyette's Inc
- B. *Facility Location:* 1260 Shawmut Avenue
New Bedford, MA 02746
- C. *Facility Contacts:* Jake Goyette, General Manager
508-441-0245, jake@goyetteautoparts.com

Tim Cusson, Vice President (Construction)
800-883-9100, timc@parallelproducts.com
- D. *NPDES ID No(s):* MAR053149 (MSGP)
MAR10042K (CGP)

II. Background Information

- A. *Date(s) of inspection:* October 30, 2023
- B. *Weather Conditions:* 55 °F, Rain the morning of the inspection.
- C. *US EPA Representative(s):*
Damian Bednarz, Inspector
Anna Hatke, Inspector
- D. *State/Local Representative(s):*
NA

E. Federally Enforceable Requirements Covered During the Inspection:

National Pollutant Discharge Elimination System Construction General Permit (CGP)

40 C.F.R. § 122.26 Multi-Sector General Permit (MSGP)

40 CFR Part 112 Oil Pollution Prevention regulations.

F. Previous Enforcement Actions:

None known

III. Type and Purpose of Inspection

Evaluation

IV. Facility Description

According to public records, Goyette's Inc., doing business as Goyette's Auto Parts (the "Facility" or "Site") located at 1260 Shawmut Avenue in New Bedford, Massachusetts is an auto salvager that receives salvage vehicles from primarily auctions for the reselling of auto parts, including engines and other profitable parts. The Facility has an approximate footprint of 7 acres, which includes a disassembly and storage garage and outdoor crusher. The remainder of the property is utilized for the storage of processed vehicles.

V. Inspection

Damian Bednarz and Anna Hatke ("EPA Inspectors") arrived at the facility at approximately 11 AM. The inspection was unannounced and upon arrival, Mr. Bednarz asked a mechanic in the garage to speak with a manager. EPA Inspectors were greeted by Jake Goyette, general manager of Goyette's Inc.

A. Opening Conference

EPA Inspectors presented their credentials to Mr. Goyette and explained that the reason for the visit was a routine evaluation. Mr. Bednarz asked general questions regarding the business. Mr. Goyette explained that the business recycles auto parts for resale, and that vehicles are primarily procured from salvage auctions. Customers consist of private consumers as well as the automotive repair business.

Mr. Goyette explained that the business operates from 8 AM to 5 PM and consists of approximately 50 employees. The Facility has an environmental contractor, Relco Consulting. When asked for industrial stormwater permit identification, Mr. Goyette was unsure whether the Facility had such coverage.

In addition to the routine industrial activity conducted at Goyette's Inc, auto salvage, it was later discovered during the inspection that a construction project was on-going at the Site. The construction operation was wholly within the footprint of the property, to install overhead solar panels as well as on-site electricity generation and energy storage equipment. The extent of this construction can be seen from satellite imagery (slide 1 and 2).

Mr. Goyette agreed to facilitating a Facility walkaround with EPA Inspectors.

B. Facility Tour

Mr. Bednarz asked where vehicles are drained and disassembled. Mr. Goyette explained that all engine pulling, wet disassembly, and draining occurs within the maintenance garage (slide 6, 7). Gasoline from vehicles being processed is pumped and collected within a mobile 125-gallon double walled tank (slide 5). This gasoline is reused on Site by the business. Waste oil is collected in 275-gallon waste oil totes (slide 8) within the maintenance garage. Approximately every 2 to 3 months, Western Oil Company collects waste oil from the Facility. A portion of waste oil is used to fuel the Facility's waste oil heater which is a double walled storage tank with a capacity of 250 gallons (slide 10, 11). This waste oil heater is only in operation during cooler times of the year, and waste oil is generally collected for off-site disposal during warmer months.

EPA inspectors observed within the maintenance garage, a wall of engine blocks on pallets (slide 3).

EPA Inspectors and Mr. Goyette proceeded outside of the maintenance garage and observed rims being stacked and sold (slide 12). Waste roll-off containers were in this same area (slide 13). When asked about scrap waste that comes from the crusher, Mr. Goyette stated that Spiegel's Recycling comes to collect aluminum and steel waste. Front vehicle bumpers and axles with rotors are stacked outside on pallets in this outside area (slide 14, 15). Due to the rain earlier on the day of the inspection, EPA Inspectors observed pooling of stormwater in this area, and a visible channelized is present along the perimeter of the Facility heading east (slide 16, 17). Mr. Goyette explained that due to construction activities, this area was unlevelled and the loader at the Facility would eventually add more gravel for the purpose of levelling this area. Pooling of stormwater was observed in the vehicle inventory area (slide 23) as well as the Facility's northern property boundary (slides 24-26). EPA Inspectors observed a downed silt fence along the northern property boundary (slide 19-21).

In the northwestern quadrant of the Facility, EPA Inspectors observed stockpiling of unstabilized sediment (slide 27) that was actively being used for construction activities. A loader was working these materials and aiding with pouring cement footings. When EPA Inspectors asked about the work being done, Mr. Goyette summarized that Parallel Products Solar Energy had recently installed solar panels on roof stanchions and were now installing on-Site batteries that would store the newly created energy and supply the grid.

EPA Inspectors approached the construction activity and asked to speak with the operator. Mr. Tim Cusson, vice president of Parallel Products Solar Energy, accompanied EPA Inspectors to facilitate a walkthrough of the ongoing construction activity. Mr. Bednarz asked whether the construction operation was permitted under EPA's Construction General Permit ("CGP"). Mr. Cusson explained that the activity is permitted, and that work began in late 2022. EPA Inspectors observed intact silt fencing along the edge of this activity (slides 28-30). EPA Inspectors also observed a pump in

operation, with a blue hose, collecting water from a hole in the ground leading north outside of the Facility (slides 31-33). Mr. Cusson explained that one of the final stages of the project was to install two batteries and converters.

EPA Inspectors regrouped with Mr. Goyette to finish the last area of the Facility walk through, the crushing operation (slide 34). The uncovered crusher (slide 35) is positioned just north of the maintenance garage and approximately 30 vehicles were staged around it (slides 35, 36). Mr. Bednarz asked about the frequency of crushing that occurs at the Facility. Mr. Goyette explained that the Facility crushes approximately 30-50 cars every week. Crushed vehicles, referred to as “pancakes”, are piled onto trucks typically the day they are crushed if not one day later, and each truck carries anywhere from 15-20 pancakes.

EPA inspectors also observed several totes in this area (slides 37, 38). Mr. Bednarz asked about the purpose of these totes. Mr. Goyette explained that some contain antifreeze, and others are empty for the purpose of eventually being used to store waste oil. Mr. Bednarz explained that containers that are intended for oil storage, even in an empty state, would still be applicable to Oil Pollution Prevention regulations, 40 CFR Part 112, and that the Facility would require a plan if storage is above a threshold of 1,320 gallons.

C. Records Review

No records were reviewed prior to or during this inspection, considering that it was unknown to Mr. Goyette or EPA Inspectors whether the Facility was permitted under the MSGP.

D. Closing Conference

Mr. Bednarz expressed concerns with the management of aboveground oil storage containers observed during the inspection, and informed Mr. Goyette of the need to implement a Spill Prevention Control and Countermeasure (“SPCC”) Plan should total aboveground storage of petroleum products be above 1,320 gallons.

Mr. Bednarz explained that an inspection report, along with photos taken the day of the inspection, would be sent to him within 70 days of the inspection.

Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA’s authorities under federal statutes and regulations to pursue further investigation or action.