



NPDES Compliance Inspection Report

LKQ KC Truck Parts Spokane Facility

Permit # WAU000658

Inspection Date: 11/17/2020

Prepared by:

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Enforcement & Compliance Assurance Division
Water Enforcement & Field Branch
Surface Water Enforcement Section

Inspector Signature/Date:

Supervisor Signature/Date:

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[Unless otherwise noted, all details in this inspection report were obtained from conversations with Brad Hohn or from observations made during the inspection and/or file review.]

I. Facility Information

Facility Name:	LKQ KC Truck Parts Spokane Facility
Facility Owner:	LKQ Corporation
Facility Address:	1100 N. Howe Road Spokane, Washington 99212
Mailing Address:	1100 N. Howe Road Spokane, Washington 99212
Facility Contact(s):	Brad Hohn, Operations Manager LKQ KC Truck Parts (509) 570-5620 ext. 5630 dbhohn@lkqcorp.com Daniel McIntyre, Environmental Compliance Manager LKQ Corporation dpmcintyre@LKQCORP.com
Latitude/Longitude:	N 47.66658 W -117.32777
NAICS Code(s):	423140 – (Motor Vehicle Parts (Used) Merchant Wholesalers)
NPDES Permit Number:	WAU000658
Site Size:	3.5 acres

II. Inspection Information

Inspection Date:	November 17, 2020
Inspector:	Rob Grandinetti, Compliance Officer EPA Region 10, ECAD / SWES (509) 376-3748
Arrival Time:	11:00 AM
Departure Time:	12:00 AM

Weather: Cloudy and cold, no rain at the time of the inspection

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

III. Permit Information

LKQ KC Truck Parts of Spokane, Washington is an automotive dismantling facility located at 1102 North Howe Road, Spokane. The LKQ property is approximately 3.5 acres in size. The topography of the surrounding area is generally flat.

Used semi-trucks are transported to the site and unloaded at the unpaved parking lot to the north of the Dismantling Building where they are checked in. The trucks are then moved into the Dismantling Building where they are checked for leaking fluids, inventoried for usable parts, numbered, and batteries removed. Vehicles are then drained of fluids, the fluids are recovered, the vehicles are dismantled, and all sellable parts are removed. After the vehicles are processed, they are then deposited into rows in the southern portions of the Site, adjacent to the Pacific Pride gas station.

IV. Facility Background

At the time of the inspection I was informed by a facility representative that the LKQ facility was inspected by a third party to verify an appropriate Stormwater Pollution Prevention Plan (SWPPP) was created, and to determine if the facility discharged stormwater into surface waters or a municipal stormwater conveyance system. The third party was Apex Companies, LLC, whom informed LKQ that the storm drains on their property and next to their property were dry wells that would not discharge to surface waters or a municipal stormwater conveyance system. There are six dry wells on their property. Apex Companies, LLC also prepared the SWPPP.

Prior to the on-site inspection I reached out to the City of Spokane Valley's stormwater program. My conversation with the City of Spokane Valley was to determine if the storm drains, I observed while performing a drive by of the site on 11/13/2020, had surface connections to a surface water, municipal sanitary sewer system, or municipal storm sewer system.

V. Inspection Chronology

This was an unannounced inspection. I performed a drive by of the site on 11/13/20 to determine if there were any storm drains in close proximity to the facility that had the potential to receive runoff from LKQ. I observed a storm drain that appeared to have stains leading from the LKQ facility to it, indicating past discharges. On the day of the inspection, I was greeted at the site by Brad Hohn, Operations Manager, and I informed him that I was there to perform a National Pollutant Discharge Elimination System (NPDES) inspection to verify compliance with the Clean Water Act. I presented my

credentials to Mr. Hohn and he did not deny me access to conduct my inspection.

Following this opening conference, I conducted a site review, a file review, and held a closing conference.

VI. Site Review

The LKQ facility is located in a heavily industrialized part of Spokane. During the inspection, I walked around the outside portions of the facility with Mr. Hohn and I noticed that part of the facility was paved, and part of the facility was gravel and dirt. The dry wells (storm drains) that I saw had socks inserted to help prevent pollution from entering the dry wells. The socks looked pretty new, and I was told they were just installed in September and are annually replaced. As we walked towards the southern portion of the site, I pointed out the storm drain of concern from my drive by of the site on 11/13/2020. Through both my observations and conversations at the time of inspection, and in talking to staff at the City of Spokane Valley, I determined this storm drain was a dry well as were all of the other storm drains.

As stated above there are storm drains within the property of the facility as well as adjacent to the property appear to be dry wells. I asked Mr. Hohn if these were permitted under the Underground Injection Control (UIC) Program but Mr. Hohn indicated he was not familiar with the UIC Program. EPA will refer this matter to the Washington State Department of Ecology (WSDOE) UIC Program for follow-up.

VII. File Review

The following documents were reviewed as part of the inspection:

Stormwater Pollution Prevention Plan (SWPPP) – A hardcopy version of the SWPPP was available and reviewed on-site at the time of inspection. An electronic version of the SWPPP was e-mailed to me post-inspection. The SWPPP was current and appeared to contain all of the permit required elements. The SWPPP was prepared by Apex Companies, LLC and was last certified on 11/2/16.

According to the SWPPP there was an analysis performed to the applicability of needing a UIC permit. The SWPPP states the following:

“The LKQ facility does not require treatment of stormwater runoff beyond that provided by the oil/water separator and biobags described in the SWPPP. The facility discharges to six registered UICs that qualify for vadose zone treatment of stormwater. The UICs at the facility qualify for this exemption based on the following criteria:

- Pollutant loading at the facility is low according to Table 5.6.2 in the Stormwater Management Manual for Eastern Washington. The facility is a parking lot with Parking areas with less than 40 trip ends per 1,000 SF of gross building area or less than 100 total trip ends and has roofs that are

subject only to atmospheric deposition and normal heating, ventilation, and air conditioning system outputs.

- The vadose zone beneath the facility's UICs is described as fine to medium sand with silt based on well logs in the area. According to Table 5.6.1 in the Stormwater Management Manual for Eastern Washington, the treatment capacity for this type of soil is medium. This type of soil requires fifteen feet from the bottom of a UIC to the seasonal groundwater high to be adequate for vadose zone treatment.
- The bottom of the deepest UIC on the facility is 6 feet below ground surface (bgs). The highest seasonal groundwater in the area based on wells logs is 65 feet bgs. This leaves 59 feet between the bottom of the UIC and top of seasonally high groundwater

Combining the low pollutant loading and the adequate vadose zone below the UICs, this facility does not require treatment of stormwater before discharge to the onsite UICs."

VIII. Areas of Concern

Observations during the inspection identified the possible need to receive UIC permits for the dry wells described in their SWPPP. For further information on the WSDOE UIC program go to: <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Underground-injection-control-program>.

IX. Closing Conference

Following the site review and file review, a closing conference was held with Mr Hohn where I discussed my inspection observations and informed Mr. Hohn that I would be referring my observations to the WSDOE UIC Program. I then thanked him for his time and cooperation with the inspection.

Similarly, on 12/11/20, I had a phone conversation with Mr. Danial McIntyre, LKQ's compliance manager for most of the west coast LKQ facilities. In the phone call I shared my inspection observations and explained that I will be referring my inspection observations to the WSDOE UIC Program.

ATTACHMENT A

Facility Site Map

ATTACHMENT B

Photograph Log

All photographs taken by Rob Grandinetti on November 17, 2020

Photo Log – LKQ Heavy Truck, Spokane Facility



Photo #:01

Description: This is a photo of one of the storm drains that leads to a dry well. The storm drain sock prevented the leaves from entering the dry well.



Photo #:02

Description: Southernmost part of the facility. These trucks have had all the fluids and mechanical parts removed from them.

ATTACHMENT C

LKQ Heavy Truck, Spokane Facility Stormwater Pollution Prevention Plan