



NPDES Compliance Inspection Report

LKQ Heavy Truck

Portland, OR

NPDES Tracking # ORU000502

Inspection Date: January 28, 2021

Prepared by:

Rachel Stephenson

U.S. Environmental Protection Agency, Region 10

Enforcement and Compliance Assurance Division

Water Enforcement and Field Branch

Field, Data, and Drinking Water Enforcement Section

Inspector Signature/Date:

RACHEL STEPHENSON

Digitally signed by RACHEL STEPHENSON
Date: 2021.02.10 13:30:23 -08'00'

Supervisor Signature/Date:

PETER CONTRERAS

Digitally signed by PETER CONTRERAS
Date: 2021.02.10 13:39:53 -08'00'

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[Unless otherwise noted, all details in this inspection report were obtained from conversations with Mr. Schwantes, Mr. Murphy, and Mr. McIntyre; or from observations during the inspection.]

I. Facility Information

Facility Name:	LKQ Heavy Truck
Facility Owner/Operator:	LKQ Corporation
Facility Contacts:	Karl Murphy Plant Manager LKQ Heavy Truck Phone: (503) 288-6333 kxmurphy@lkqcorp.com Farley Schwantes Inventory Manager LKQ Heavy Truck Phone: (503) 288-6333 Ext. 6725 fjschwantes@lkqcorp.com Dan McIntyre Environmental Compliance Manager LKQ Corporation Phone: (858) 375-7115 dpmcintyre@lkqcorp.com
Facility Location:	5925 NE Portland Hwy Portland, OR 97218
Lat/Long:	+ 45.5676719°, -122.6010755°
Mailing Address:	5925 NE Portland Hwy Portland, OR 97218
NPDES Permit Number:	Unpermitted (NPDES Tracking #: ORU000502)

II. Inspection Information

Inspection Date:	January 28, 2021
Inspectors:	Rachel Stephenson, Inspector

EPA/R10/ ECAD/WEFB/FDDWES
(206) 553-6366

Other Individuals Present: Stacy Hibbard, Environmental Manager
City of Portland Bureau of Environmental Services
(503) 823-5547
Stacy.Hibbard@portlandoregon.gov

Arrival Time: 9:00 AM
Departure Time: 10:00 AM

Weather Condition: Overcast; Light Rain

Purpose: This inspection was conducted to document the facility's compliance with the Clean Water Act.

III. Permit Information

The facility does not have a permit to discharge stormwater associated with industrial activity. The facility has a Safe Drinking Water Act Underground Injection Control (UIC) permit (#10264) to discharge stormwater to a dry well.

IV. Inspection Chronology

This was an announced inspection. The morning of the inspection, I spoke with a facility representative over the phone. We discussed the logistics and purpose of the inspection, the facility representative confirmed that there would be someone at the site to meet with us for the inspection.

For this inspection, I operated as the lead inspector. I was accompanied by Stacy Hibbard, an Environmental Manager for City of Portland Bureau of Environmental Services, who participated in the inspection on behalf of Oregon Department of Environmental Quality (ODEQ). We arrived at LKQ Heavy Truck at 9:00 AM on January 28, 2021. We entered the site office, signed in on the visitor sheet, and waited for the facility representative (Farley Schwantes) to meet with us. When Mr. Schwantes arrived at the site office, I identified myself as an EPA inspector and presented my credentials to him. We also exchanged business cards. I informed him that the purpose of the visit was to conduct a compliance inspection under the Clean Water Act (CWA). I briefly explained that in the form of the Stormwater Discharge General Permit No. 1200-Z, EPA has permitting regulations under the Clean Water Act's National Pollutant Discharge Elimination System (NPDES) for stormwater discharges from various industrial activities including auto parts supply and storage. We were not denied access to the facility.

I conducted the opening conference with Mr. Schwantes in the site office, with the facility's Environmental Compliance Manager (Dan McIntyre) participating over the phone. The opening conference involved a discussion of the purpose and expectations of the inspection.

Following the opening conference, a facility walk-through took place. I concluded the inspection with a closing conference to discuss observations and notes taken throughout the course of the inspection. We were accompanied throughout the inspection by Mr. Schwantes and joined by LKQ Plant Manager Karl Murphy for the closing conference. Mr. McIntyre participated in the opening and closing conferences via phone. We concluded the inspection at 10:00 AM.

V. Background and Activity

LKQ Heavy Truck is a wholesale truck and truck parts facility that was established about 60 years ago in Portland, OR. LKQ Corporation is the umbrella corporation under which this facility operates.

LKQ Heavy Truck currently employs around 19 individuals at the Portland location. Mr. Schwantes serves as the inventory manager, while Mr. Murphy serves as the plant manager at the facility. Mr. McIntyre operates as the Environmental Compliance Manager for LKQ Corporation out of Poway, CA.

VI. Facility Review

LKQ Heavy Truck is located in northeast Portland, southwest of the Columbia River. See **Attachment A**, Aerial Map. The facility is comprised of three individual lots, each with their own physical addresses. The main lot, referred to as Lot 1, is located at 5925 NE Portland Hwy. The small storage lot, referred to as Lot 2, is located at 5811 NE Portland Hwy. The third lot, referred to as Lot 3, is located across the street at 6126 NE 60th Avenue.

LKQ Heavy Truck primarily operates as a sales facility, offering a range of wholesale auto parts and trucks. Typical daily operations involve unloading, repairing, storing, and selling truck parts. Lot 1 operates as the main warehouse and sales office, with the majority of operations occurring indoors. Lot 2 serves as a small, primarily unpaved parts storage lot. Lot 3 is a larger lot where used truck storage and repair occurs. Activities at Lot 3 occur both indoors and outdoors, the lot is partially paved.

Stormwater in Lot 1 is routed to the City of Portland sanitary sewer system via storm drains interspersed throughout the property. Lot 1 also has a large sub-surface collection vault where most of the "yard" stormwater is collected and never discharged. Lot 2 has three catch basins that receive all of the stormwater on the lot. These catch basins contribute directly to a dry well, for which LKQ Heavy Truck has

a UIC permit (#10264). Lot 3 only has one catch basin, which routes stormwater to a dry well.

I did not observe stormwater discharge beyond what is routed to catch basins, dry wells, and the City of Portland sanitary sewer system at the time of the inspection.

See **Attachment A**, which is an aerial map of the facility. See **Attachment B**, which is photographic documentation of the facility as seen during the site review.

VII. Areas of Concern

A. Oil & Grease Management

During my review of the facility at the time of the inspection, I noted several storm drains that appeared to be routing stormwater with visible oil sheen (**See Attachment B, Photos 1 & 6**). I mentioned this to Mr. McIntyre during the closing conference and we discussed the UIC permit for the facility's dry wells. I indicated that oil & grease management should be improved, particularly for the catch basins contributing to groundwater via the dry well in Lot 2. Mr. McIntyre stated that he would work on making immediate improvement to oil & grease management following the inspection.

VIII. Closing Conference

A closing conference was held with Mr. Schwantes, Mr. Murphy, and Mr. McIntyre to discuss my inspection observations. I thanked them for their time and cooperation with the inspection. I left the facility at 10:00 AM.

ATTACHMENT A

Aerial Map



ATTACHMENT B

Photograph Log

All photographs taken by Rachel Stephenson on January 28,
2021 Nikon Coolpix AW120, Serial # 32057443

Photo Log – LKQ Heavy Truck

Photo #:01 (DSCN0577)

Description: Photo of a catch basin in Lot 2, which routes stormwater to a dry well. Note the presence of visible sheen (O&G).



Photo #:02 (DSCN0578)

Description: Facing east, photo of a manhole cover for the dry well in Lot 2.



Photo #:03 (DSCN0579)

Description: Facing northwest, photo of parts storage in Lot 2.



Photo #:04 (DSCN0580)

Description: Photo of a catch basin in Lot 2, which routes stormwater to a dry well.

Photo Log – LKQ Heavy Truck

Photo #:05 (DSCN0581)

Description: Photo of a catch basin in Lot 1, which routes stormwater to the City of Portland sanitary sewer system.



Photo #:06 (DSCN0582)

Description: Photo of a catch basin in Lot 1. This catch basin collects all of the "yard" stormwater (main activity area). Note the presence of visible sheen (O&G).



Photo #:07 (DSCN0583)

Description: Photo of a catch basin in Lot 1, which routes stormwater to the City of Portland sanitary sewer system. This storm drain also contains a filtration system, which treats stormwater prior to entry into the sanitary system.



Photo #:08 (DSCN0584)

Description: Facing north, photo of a collection vent that collects stormwater in a sub-surface collection vault. This water is held in the vault indefinitely, never discharged.

Photo Log – LKQ Heavy Truck

Photo #:09 (DSCN0585)

Description: Facing northwest, photo of a collection vent that collects stormwater in a sub-surface collection vault. This water is held in the vault indefinitely, never discharged.



Photo #:10 (DSCN0586)

Description: Facing northeast, photo of water pump that draws City of Portland water.



Photo #:11 (DSCN0587)

Description: Facing east, photo of a storm drain located in the sales office parking lot. This drain routes stormwater to a small settling vault.



Photo #:12 (DSCN0588)

Description: Facing north, photo of the side yard in Lot 1.

Photo Log – LKQ Heavy Truck

Photo #:13 (DSCN0589)

Description: Facing west, photo of the “old half” of Lot 3. This was the initially purchased portion of the lot.



Photo #:14 (DSCN0590)

Description: Facing east, photo of the “new half” of Lot 3. This portion of the lot was purchased later.



Photo #:15 (DSCN0591)

Description: Facing south, photo of stormwater pooling on a paved portion of the “new half” of Lot 3.



Photo #:16 (DSCN0592)

Description: Photo of the catch basin in Lot 3 that contributes to a dry well.