



NPDES Compliance Inspection Report

LKQ Barger Auto Parts – Nampa Nampa, Idaho

Permit #: IDR05J000

Inspection Date: May 10, 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 07:51:13 -07'00'

Supervisor Signature/Date:

PETER CONTRERAS Digitally signed by PETER CONTRERAS
Date: 2021.06.23 11:23:02 -07'00'

Contents

I.	Facility Information	1
II.	Inspection Information.....	2
III.	Permit Information.....	2
IV.	Background	2
V.	Inspection Chronology.....	2
VI.	Opening Conference	3
VII.	Laboratory Analysis.....	4
VIII.	File Review	4
IX.	Site Inspection.....	5
X.	Areas of Concern	5
XI.	Closing Conference.....	6

APPENDIX A – Aerial Photo and Site Diagram

APPENDIX B – Inspection Photographs and Photo Log

(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 – Nampa

Facility Owner/Operator: LKQ Corporation

Physical Address: 3326 Garrity Boulevard
Nampa, Idaho 83687

Lat/Long: 43.58897, -116.53030

Mailing Address: 3326 Garrity Boulevard
Nampa, Idaho 83687

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: IDR05J00O

Receiving Water: Mason Creek

II. Inspection Information

Inspection Date: May 10, 2021

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

Arrival Time: 9:00 AM

Departure Time: 1:30 PM

Weather: Sunny, 50°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 – Nampa (“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 an 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. The facility has had permit coverage since January 6, 2021.

IV. Background

LKQ Corporation owns and operates LKQ Barger Auto Parts – Nampa located at 3326 Garrity Boulevard in Nampa, Idaho. On July 1, 2011, LKQ Corporation bought the Nampa facility. From 2014 through 2019, the facility operated under a “No Exposure Certificate”. In October 2019, the facility began the process of attaining coverage under the MSGP. On January 6, 2020, coverage under the MSGP started.

On March 12, 2021, the Environmental Protection Agency (EPA) conducted a desk audit of the facility. The inspector did not find any areas of concern.

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 9:00am. I presented my credentials to Mr. Matt Davis, Plant Manager, Mr. Daniel Martin, Operations Manager, and Mr. Timothy Klein, 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 10 full time personnel.

The facility is primarily an automobile recycling operation. It sells used auto parts reclaimed from junked cars. In addition to selling used parts, the facility sells new aftermarket vehicle products.

The facility’s site covers approximately 10.3 acres with 8.8 acres ($\approx 80\%$) exposed to direct precipitation. The remaining 20% is covered by structures. Approximately 1.1 acres ($\approx 10\%$) of the ground surface is impervious to rainfall. The site’s surface is generally flat and composed of a combination of dirt, gravel, and asphalt. Per www.usclimatedata.com, the average annual precipitation received by Nampa, Idaho is 11.38 inches with no more than one to two inches within a 24-hour period.

The facility has three outfalls, labeled 001 - 003. However, only Outfall 001 is sampled. I asked the Representatives if the facility had documentation showing that Outfalls 002 and 003 were substantially identical to Outfall 001 and, therefore, didn’t need to be monitored. The facility was unable to provide documentation of substantially identical outfalls. Stormwater that discharges from the facility enters the City of Nampa’s Municipal Separate Storm Sewer System (MS4). Once the stormwater enters the MS4, it flows to Mason Creek, which is approximately three quarters of a mile from the facility. Mason Creek is a tributary of the Boise River. The facility does not have any non-stormwater discharges.

The northern portion of the site is generally flat. The southern portion of the site slopes south and slightly west. The southeastern portion of the site slopes south towards Garrity Boulevard. The site is divided into four drainage areas. The different drainage areas are delineated on the facility diagram found in Appendix A.

Drainage area one is the largest and covers the vehicle storage area, covered vehicle dismantling, covered parts storage, hazardous waste storage and vehicle fueling area. This drainage area flows towards Outfalls 001 and 002.

Drainage area two includes the covered parts storage and flows toward two stormwater detention basins on the northwest side of the warehouse and office building. The detention basins receive stormwater flow directly from the rooftops on the buildings on the west side of Barger street.

Drainage area three includes the covered parts storage and covered part loading and unloading area. Stormwater from this area flows toward the drainage inlet in the loading dock area.

Drainage area four includes the customer and employee parking area and flows towards Garrity Boulevard.

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 maintenance building to minimize the potential of those fluids encountering 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 site activities conducted outside are junk vehicle storage and the removal of exterior vehicle body parts such as doors, hoods, and windshields, and any other fluid free parts.

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)
- 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.

From the office, located on the portion of the property west of Barger Street, we walked to the stormwater detention basin on the northeast side. The basin was dry at the time of inspection (**Photo 1**). There was an inlet pipe that transports water from the buildings' gutter system (**Photo 2**). There was a second detention basin on the northwest side of the warehouse (**Photo 3**) that stormwater from the rooftops and surrounding area. The Representatives said the detention basins did not have an outlet and all water collected infiltrates into the ground. I did not observe any evidence to indicate otherwise.

Before we moved on to the larger segment of the property site east of Barger Street, we stopped at the loading dock. The entrance to the dock was sloped downward to the entrance; Centered on the ground near the dock was a catch basin grate. I asked what happened to the stormwater that entered the basin. The Representatives said the basin receives water from the loading dock as well as the facility's parking lot on the west side of Barger Street. The basin holds approximately 1,500 gallons of stormwater and does not have an outlet. The water is pumped out at least twice a year and hauled offsite for disposal.

We proceeded to the east side of Barger Street. We started out walking north and circled the facility in a clock-wise direction. I observed that the junk car storage area was built up a little more than the rest of the area. The Representatives told me the area was built up to facilitate stormwater infiltration rather than run-off. On our tour around the site, I did not observe any vehicles parked outside. The tour of the site ended at the sampling point (**Photo 4**) located on the facility's property near Garrity Boulevard. The Representatives explained that the water sample was collected through sheet flow prior to the stormwater entering the MS4 grate.

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 reports for the 2nd and 3rd quarter of 2020 were missing.

B. SWPPP Map

Part 5.2.2 of the MSGP states that the SWPPP “must include” a site map that includes, among other items, the “size of the property in acres”, “locations of all stormwater control measures”, “locations of all stormwater conveyances including ditches, pipes, and swales.”

At the time of the inspection, I reviewed the SWPPP site map. The map did not contain the required items quoted above. The map can be found in Appendix A.

C. Unmonitored Outfalls

Part 6.1.1 of the MSGP states, in part, “Applicable monitoring requirements apply to each outfall authorized by this permit, except as otherwise exempt from monitoring as a ‘substantially identical outfall.’ ”

At the time of the inspection, I reviewed the SWPPP map. The SWPPP map shows three outfalls, labeled 001 – 003, however, the Representatives indicated that only Outfall 001 was monitored.

D. 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 temperature of the water sample upon receipt by the laboratory was consistently left off the Chain of Custody documents. **Photo 5** is an example of a chain of custody document reviewed during the inspection.

XI. Closing Conference

On May 10, 2021, I held a closing conference with Mr. Davis, Mr. Martin, and Mr. Klein. We discussed my observations and 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



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 10, 2021 with a Panasonic DMC-FH25 camera)



Photo 1 / P1000866 – Detention Pond, NE detention pond



Photo 2 / P1000865 – Detention Pond Inlet

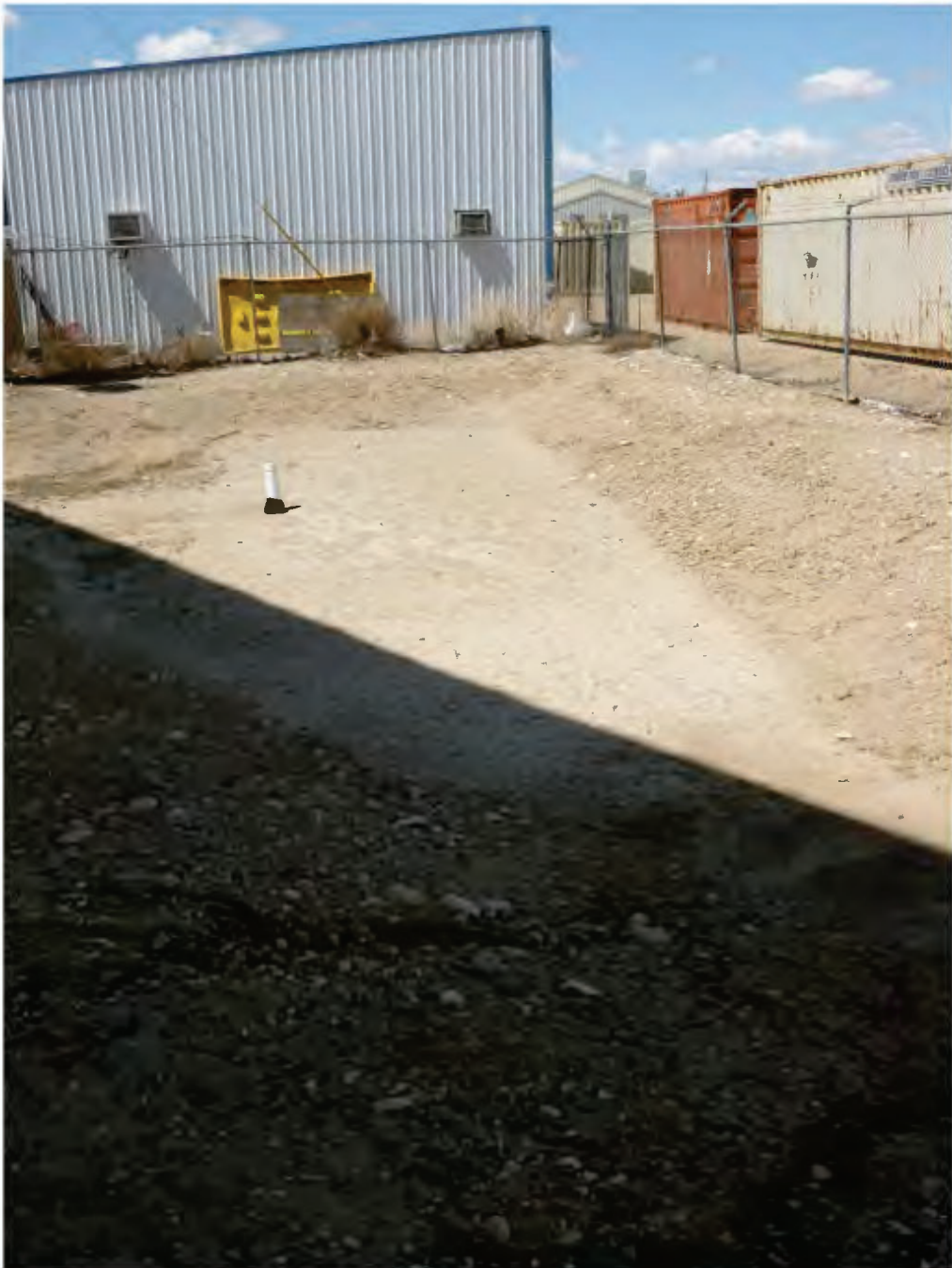


Photo 3 / P1000867 – Detention Pond, NW detention pond



Photo 4 / P1000870 – Sampling Point

Complete list of photographs taken during the inspection:

- P1000854 – SWPPP, binder cover
- P1000855 – Email from NeT
- P1000856 – Letter, additional monitoring requirements, page 1
- P1000857 – Letter, additional monitoring requirements, page 2
- P1000858 – SWPPP, page 3, stormwater & drainage information
- P1000859 – SWPPP, page 4, stormwater & drainage information
- P1000860 – SWPPP, facility map 1
- P1000861 – *Blurry – Deleted*
- P1000862 – SWPPP, facility map 2
- P1000863 – Chain of Custody Document
- P1000864 – SWPPP, training record
- P1000865 – Detention Pond Inlet
- P1000866 – Detention Pond, NE detention pond
- P1000867 – Detention Pond, NW detention pond
- P1000868 – Catch Basin Drain
- P1000869 – Sampling Point
- P1000870 – Sampling Point
- P1000871 – Used Antifreeze and Oil Tanks