

**Environmental
Protection Agency**

John Kasich, Governor
Robert Taft, Lt. Governor
Tom Costello, Director

August 31, 2010

RE: 422 AUTO WRECKING
3GR00155*DG
INDUSTRIAL STORMWATER
TRUMBULL COUNTY

NOTICE OF VIOLATION

CERTIFIED MAIL

Mr. Roger Howard
422 Auto Wrecking
4858 Parkman Road NW
Warren, Ohio 44481

Dear Mr. Howard:

On August 2, 2010, Ohio EPA conducted an inspection of 422 Auto Wrecking located at 4858 Parkman Road NW, City of Warren, Trumbull County. Ohio EPA records indicate that the site is covered by the General National Pollutant Discharge Elimination System (NPDES) Permit for Storm Water Associated with Industrial Activity (General Storm Water Permit), permit No. 3GR00155*DG. The following observations were made:

422 Auto Wrecking is an automobile salvage yard located at 4858 Parkman Road NW in Warren, Ohio. Runoff from the site flows into a ditch located along the western border of the property into a roadside ditch along State Route 422. Wastewaters generated are oil, gasoline, and other automobile fluids along with wash waters from the dismantling garage.

During the inspection conducted on August 2, 2010, the wastewater generated from the dismantling garage was being pumped behind the garage and discharged onto the ground. **Please be aware that the discharge of non-storm water constitutes a violation of Part III.A of the General Storm Water Permit.** 422 Auto Wrecking is not authorized to discharge wastewater from this facility.

To properly manage wastewaters and prevent illicit discharges, a holding tank or other approved disposal or pretreatment system should be installed. You may contact Erm Gomes of this office at (330) 963-1183 to discuss other wastewater treatment options. Please be aware that prior to the installation of a pretreatment or industrial waste disposal system, a Permit to Install (PTI) must be approved by this office as required in Ohio Revised Code 6111.45. PTI applications are available on the Ohio EPA website.

Implementation of site specific best management practices (BMPs) is required for each industrial site. The hopper used to store automobile motors was not covered. A temporary or permanent cover should be added to the hopper and a record of such should be included in the Storm Water Pollution Prevention Plan as required in Part 4.D.3 of the permit.

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Further, **422 Auto Wrecking was not able to produce a Storm Water Pollution Prevention Plan (SWPPP) for the facility. This is a violation of Part IV.A of the General Storm Water Permit.** Per Part IV.A.1 of the NPDES permit, facilities in existence as of April 1, 1993, were required to prepare an SWP3 on or before April 1, 1993, and the plan was to be implemented on or before October 1, 1993. Facilities that commence discharges after April 1, 1993, are required to prepare and implement the plan within 180 days of initial issuance of General Permit coverage. To correct this violation, 422 Auto Wrecking must develop and implement an SWPPP as soon as practicable.

Failure to comply with the NPDES permit is a violation of Ohio Revised Code 6111.04 and 6111.07. Violations of ORC 6111 are punishable by fines of up to \$10,000 per day of violation.

To address these violations, we ask that you take the following actions:

1. No later than September 21, 2010, respond in writing with your plans to prevent or properly manage wastewater generated by your facility.
2. Submit a PTI application to this office no later that October 1, 2010, regarding your plans to properly treat or dispose of wastewater.
3. The SWPPP shall be created and available on site for review. In addition, please submit a copy of the plan to this office no later than December 1, 2010. Storm water best management practices (BMPs) are to be implemented upon creation of the SWPPP. For BMPs that may require additional time to implement, please propose a schedule for their implementation with your plan submittal.

If you should have any questions concerning this letter, feel free to contact this writer at (330) 963-1125 or by e-mail lindsey.olmstead@epa.state.oh.us.

Sincerely,



Lindsey A. Olmstead
Assistant to the District Engineer
Division of Surface Water

LAO:bo

pc: Erm Gomes, Ohio EPA, DSW, NEDO
Richard Curl, Trumbull County Health Department



Figure 1: Wastewater from the dismantling garage being discharged onto the ground.

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