



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

June 17, 2011

RE: A&C AUTO PARTS & WRECKING
3GR00100*DG
STORMWATER
CUYAHOGA COUNTY

Mr. Michael Weiss
A&C Auto Parts & Wrecking
3805 Ridge Road
Cleveland, OH 44144

Dear Mr. Weiss:

On June 8, 2011 this writer conducted an inspection of your facility, located at 3805 Ridge Road, Cleveland, to determine compliance with your Industrial General Storm Water National Pollutant Discharge Elimination System (NPDES) permit referenced above. Dan Bogoevski, Ohio EPA District Engineer, was also present during this inspection. While on site, we spoke with you and Tom Scharfeld, Vice President of A&C Auto Parts & Wrecking. Along with our observations from the inspection we have provided comments concerning your permit below:

General:

1. This site is the location of A&C Auto Parts & Wrecking, a company that does auto dismantling and parts recycling.
2. All fluids are removed from vehicles upon their arrival at the site. About 200-250 vehicles are kept on site without drivelines.
3. The storm water pollution prevention plan indicates that runoff from this site discharges to a combined sewer system. Please be aware that the NPDES storm water program does not apply to discharges to combined sewers. However, you may be subject to pretreatment program requirements established by the local wastewater treatment plant operator, i.e., the Northeast Ohio Regional Sewer District (NEORS). Please contact Scott Broski of NEORS at (216) 881-6600 to determine if you discharge to a combined or separate storm sewer system, and if you discharge to a combined sewer system, what, if any, pretreatment program requirements are applicable to your facility.
4. If all storm water from this facility is discharged to a combined sewer system, NPDES permit coverage can be terminated by submitting a Notice of Termination (NOT) to Ohio EPA. A copy of this form and instructions are available on-line at www.epa.ohio.gov/dsw/storm/stormform.aspx.
5. The facility has done a satisfactory job of implementing storm water best management practices (BMPs) as required by the NPDES permit. We would encourage you to maintain these practices even if it is determined that an NPDES permit is not required for your facility.

Although operations are generally in compliance with the NPDES permit, we offer the following comments to improve storm water pollution prevention practices at your facility:

Inspection Observations:

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1. While walking around the outside of the building we noticed three 5-gallon buckets of some sort of automotive fluid were sitting near a manhole near the southeast side of the building (Figure 1). These should be stored indoors, placed within secondary containment, or moved further from the manhole to prevent discharge in the event of a spill.
2. There was some staining on the ground in the dismantling area (Figure 2). Absorbent materials should be used to soak up any spills in order to keep the area clean.

If NPDES Permit coverage must be maintained, the SWPPP requires these updates:

1. Based on the activities performed at this site, the facility is not subject to SARA 313 requirements. This section can be removed from the Storm Water Pollution Prevention Plan (SWPPP).
2. Employee training must be conducted at least once per year as required in Paragraph D.7.b.9 in Part IV of the permit. Records of scheduled training dates, topics covered, and attendance should be added as an appendix to the SWPPP and kept for no less than 6 years.
3. A trench drain was observed towards the front of the building on the south side. As discussed, this drain is not currently shown on the facility map and must be added to the map in the SWPPP.

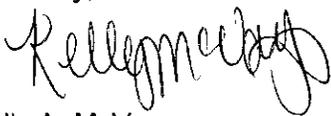
Action Items

- Evaluate the ultimate point of storm water discharges and determine applicability of NPDES permit program for storm water associated with industrial activity.
- If NPDES permit program is applicable, update SWPPP as described above.

You are directed to provide me with a letter of response indicating the actions you will take to address the concerns and violations noted above. Please provide me with a letter of explanation no later than July 11, 2011.

If you should have any questions concerning this letter, feel free to contact this writer at (330) 963-1125 or by email kelly.mcvay@epa.ohio.gov.

Sincerely,



Kelly A. McVay
Assistant to the District Engineer
Division of Surface Water

KAM/mt

cc: Thom Scharfield, A&C Auto Parts & Wrecking

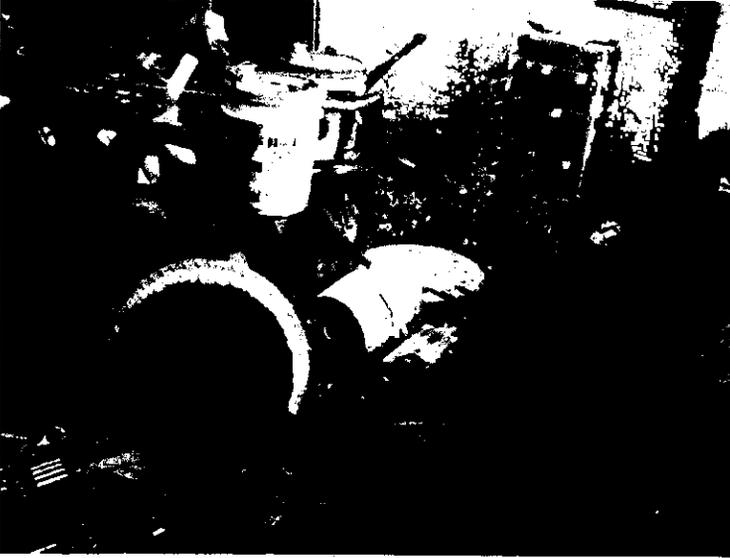


Figure 1: Buckets sitting near manhole



Figure 2: Signs of oil staining near dismantling area