

**Environmental  
Protection Agency**

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director

August 16, 2010

RE: A&H AUTO SALVAGE  
3GR00551\*DG  
STORMWATER  
CUYAHOGA COUNTY

Mr. Alex Holoka  
A&H Auto Salvage  
13100 Broadway Avenue  
Garfield Hts, OH 44125

Dear Mr. Holoka:

On August 2, 2010 this writer conducted an inspection of your facility, located at 13100 Broadway Avenue in Garfield Heights, to determine compliance with your Industrial General Storm Water NPDES permit referenced above. Along with my observations from the inspection I have provided comments concerning your SWPPP below:

General:

This facility is an auto body repair shop, an impound lot and a salvage yard. The salvage yard operations are conducted along the east side of the property while the auto body repair shop is operated out of the main building. Storm drains on the property are all located along the west side of the property near the repair shop bays. Salvage cars are brought in and stored in the yard until parts from the cars are needed.

Inspection Observations:

1. Drain all fluids from vehicles upon arrival at the site. This includes engine oil, oil filters, antifreeze, transmission fluids, brake fluids, and other misc. fluids. For cars in the storage lot you should inspect vehicles for leaks as soon as possible once they arrive on-site as well as a weekly inspection of the vehicles for any signs of slower leaks.
2. Install a berm around the car processing area to minimize runoff from this area. This berm would also act as a secondary containment in case a vehicle is leaking or a spill occurs while processing. I also would suggest building a roof over the car processing area to eliminate contact with storm water.
3. Engines and transmissions that have been removed from the vehicles are currently being stored under a roofed structure on metal racks. However the structure does not have any walls to keep rain and snow from coming into contact with the engines/transmissions. I would suggest either building sides for the building or installing canvas tarps around the building to limit the exposure to the elements. Aside from the lack of walls on the building, half of the engines in the building are on the racks while the other half are sitting on the ground. The engines that are sitting on the ground need to be moved onto the racks.
4. Bulk storage tanks are located near the car processing area without any secondary containment around them. I suggested during the inspection that the tanks be moved from the heavy traffic area to a more secluded spot within secondary containment to eliminate the chance of a front end loader accidentally puncturing one of the tanks. Along with the tanks near the processing area there are several tanks stored around the property. These tanks need to be moved to a centralized location within secondary containment with labels indicating what is inside (i.e. used oil, antifreeze, etc.).

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5. Batteries should be removed as soon as a vehicle enters the facility. Once the batteries are removed they should be stored inside a building, not left outside where they are exposed to the elements.
6. The auto repair section of the business is all done inside garage bays, however the trench drains that run along the entrance of the bays are connected to storm sewers. These trench drains need to either be closed off (plug and covers placed over drains) or an oil water separator needs to be installed to contain any oil/grease before it is discharged to storm sewers.

SWPPP:

1. The plan should contain specific storm water annual training dates and verification that training was conducted with the employees.
2. The site map needs to be created and the following should be included
  - a. Identify and locate on map all stormwater outfall location points with designated number (e.g. 001, 002, etc.).
  - b. Overall drainage patterns (which areas drain into each outfall).
  - c. Location of all storm sewers and sanitary sewers with direction of flow, including where all catch basins drain.
  - d. Location of potential sources of pollutants such as tank farms, raw material storage, waste material storage, dumpsters, loading/unloading docks, air pollution control equipment (e.g. bag houses, exhaust fans). List to included any outside sources whether isolated or not.
  - e. Potential sources of pollutants clearly identified on plan or by use of key.
  - f. Site acreage with estimate of impervious surface vs. pervious surface.

Action Items

- Secondary containment around the fuel tanks and fluid storage totes.
- Adopt the practice of draining cars as soon as they arrive on-site.
- Move engines off the ground and consider installing walls or tarps around the engine storage area.
- Plug trench drain in the garage.
- Update your SWPPP.

If you should have any questions concerning this letter, feel free to contact this writer at (330) 487-1708 or by email [david.rischar@epa.state.oh.us](mailto:david.rischar@epa.state.oh.us).

Sincerely,



David Rischar  
Assistant to the District Engineer  
Division of Surface Water

DR/mt



Figure 1: Car processing area. Consider installing a berm to limit stormwater run-off from this area and use oil dry as soon as spills occur so the fluids do soak into the concrete.



Figure 2: Car processing area. The oil storage container is located in the foreground and the antifreeze tote in the background.



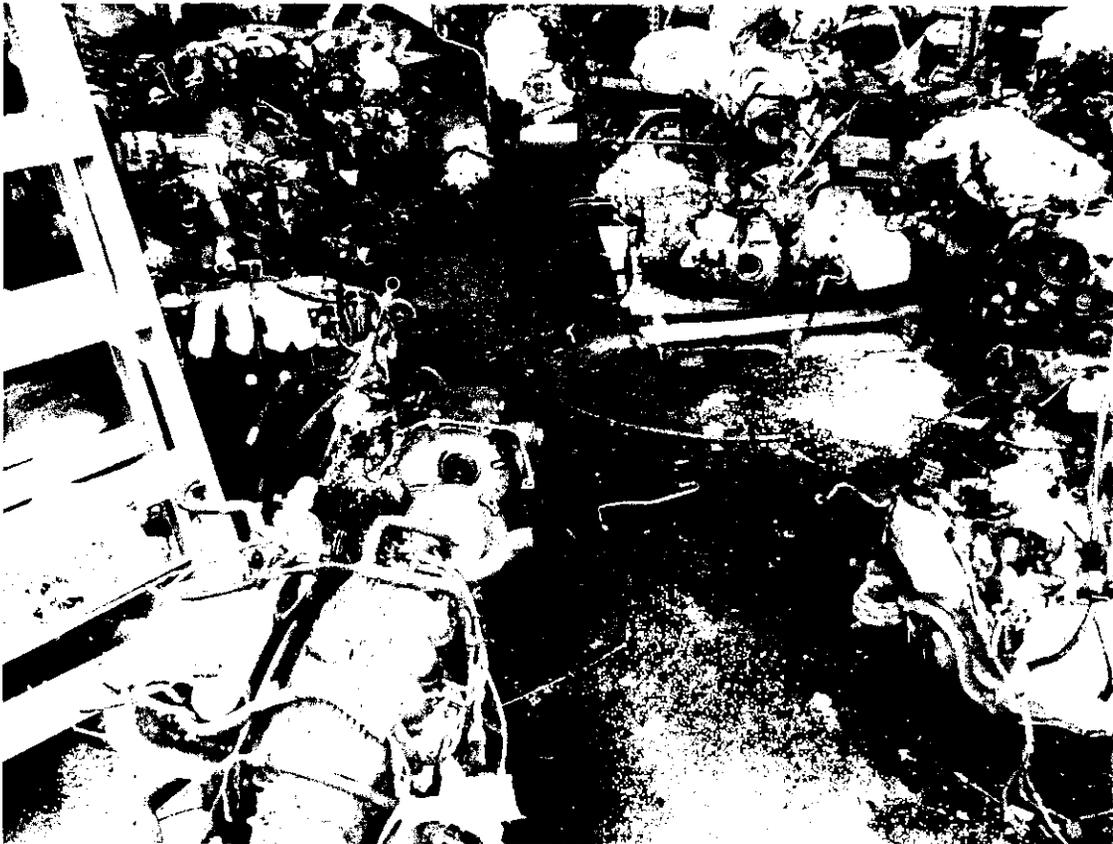
**Figure 3: Misc fluid containment totes along with transmissions sitting on the ground near the engine storage building.**



**Figure 4: Battery storage area near the car processing pad. Batteries should be stored inside and off the ground.**



**Figure 5: Engine Storage Building.** Half of the engines are being stored on the metal rack while the other half are on the ground. Install walls around this area to limit contact with stormwater.



**Figure 6: Engine Storage Building.** The engines should be on racks and off the ground to eliminate the ground contamination that has occurred.



**Figure 7: Auto repair area. This trench drain should be plugged or an oil water separator installed before it enters the storm sewer.**



**Figure 8: Auto repair area. One of the three storm drains that are located near the auto repair area. The cars in this area should be inspected weekly for leaks.**