

**Environmental
Protection Agency**

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

August 24, 2010

RE: BROOKSIDE AUTO PARTS INC
3GR00210*DG
INDUSTRIAL STORMWATER
CUYAHOGA COUNTY

Mr. Mike Blake
Brookside Auto Parts Inc
3979 Pearl Rd
Cleveland, OH 44109

Dear Mr. Blake:

On July 30, 2010 this writer conducted an inspection of your facility, located at 3979 Pearl Road in Cleveland, 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 inspection was a follow-up to a complaint inspection that Ron Fodo, Ohio EPA-DERR, conducted on July 22, 2010. Salvage operations are conducted in the rear of the property near the oil water separator. Cars are brought onsite and stored in the yard intact until parts are needed. When a car is ready to be processed, it is moved by forklift to a concrete pad in the rear of the property. This concrete pad is where the fluids (engine oil, antifreeze, transmission fluid, etc.) are drained from the cars. Fluids are stored in tanks on the pad, oil is stored in a tank with secondary containment and the antifreeze is stored in a single walled tank nearby. Runoff from the site goes to a depressed area that drains through a large oil water separator. Kristina Gramlin, NEORS, tested a sample collected on 7/22/10 from the outfall of the oil water separator.

Inspection Observations:

1. Drain fluids from cars as soon as they come on to the property. This will eliminate the chances of any accidental spill in the yard.
2. Engines that have been removed from cars should be stored under cover or left in the cars, drained of fluids, with the hood closed.
3. Spill kits should be placed near the dismantling area and used whenever oil or fluids leak onto the ground even onto the concrete dismantling pad.
4. The concrete pad, that cars are currently dismantled on, is contaminated with oil and should be replaced. The concrete should be tested and if not contaminated, it can be sent to a crusher. In addition to replacement of the concrete, I would suggest that a form of cover be installed over the processing pad, i.e. roof, or containment berm around the perimeter of the pad with good housekeeping practices implemented to clean-up fluid spills onto the pad.

5. The tank used to store oil removed from the vehicles does not have a label as to what is inside the tank. OAC 3745-279-22 (C) (1) (Used oil storage requirements for generators) states that all containers and aboveground tanks used to store used oil must be labeled or marked clearly with the words "Used Oil."
6. The oil water separator had just been pumped a week before my inspection. However, a lot of debris was floating on the surface of the water; the separator should be kept clear of floating debris to keep it from clogging and resulting in a discharge of pollutants.

Administrative Issues:

1. Based on the test results from the NEORSD, I would recommend that you apply for an Individual Industrial Stormwater NPDES Permit unless documentation (pictures) is submitted within 60 days to this office showing that the above mentioned BMPs are being enacted. Documentation should include a photograph and description of the measures implemented.
2. Brookside Auto Parts Inc was unable to produce a Storm Water Pollution Prevention Plan (SWPPP or SWP3). In accordance with OAC 3745-39-04 (C) (a): A Storm Water Pollution Prevention Plan (SWPPP or SWP3) needs to be created to comply with the Storm Water NPDES permit. The following link to the USEPA website provides guidance on preparing a SWPPP.

http://www.epa.gov/npdes/pubs/industrial_swppp_guide.pdf

Part IV.A of the NPDES permit requires facilities in existence prior to April 1, 1993, to prepare and implement an SWPPP no later than April 1, 1993. Facilities which commence discharge after April 1, 1993, are required to prepare and implement an SWPPP within 180 days of initial coverage under the NPDES permit.

3. The plan should contain specific storm water annual training dates and verification that training was conducted with the employees.
4. 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 (eg: 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 (eg: bag houses, exhaust fans). List to include 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.

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Action Items

- Adopt the practice of draining cars of fluids before storing them in the yard.
- Move engines inside/under cover.
- Develop a SWPPP.
- Consider replacing the concrete pad where processing is conducted and placing it under roof or within a containment dike.
- Place spill kits around the dismantling pad and implement good housekeeping practices to keep the pad as clean as practicable.
- Label the tanks containing oil and anti-freeze.
- Clean debris from the oil water separator and establish a maintenance schedule for this device.

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 response no later than September 6, 2010. If not completed by this date, please submit a copy of the SWPPP no later than October 1, 2010.

If you should have any questions concerning this letter, feel free to contact Erm Gomes at (330) 963-1196 or by e-mail erm.gomes@epa.state.oh.us.

Sincerely,



David Rischar
Assistant to the District Engineer
Division of Surface Water

DR:bo

pc: Dan Bogoevski, DSW, NEDO, OEPA
Erm Gomes, DSW, NEDO, OEPA
Ron Fodo, SIU, NEDO, OEPA

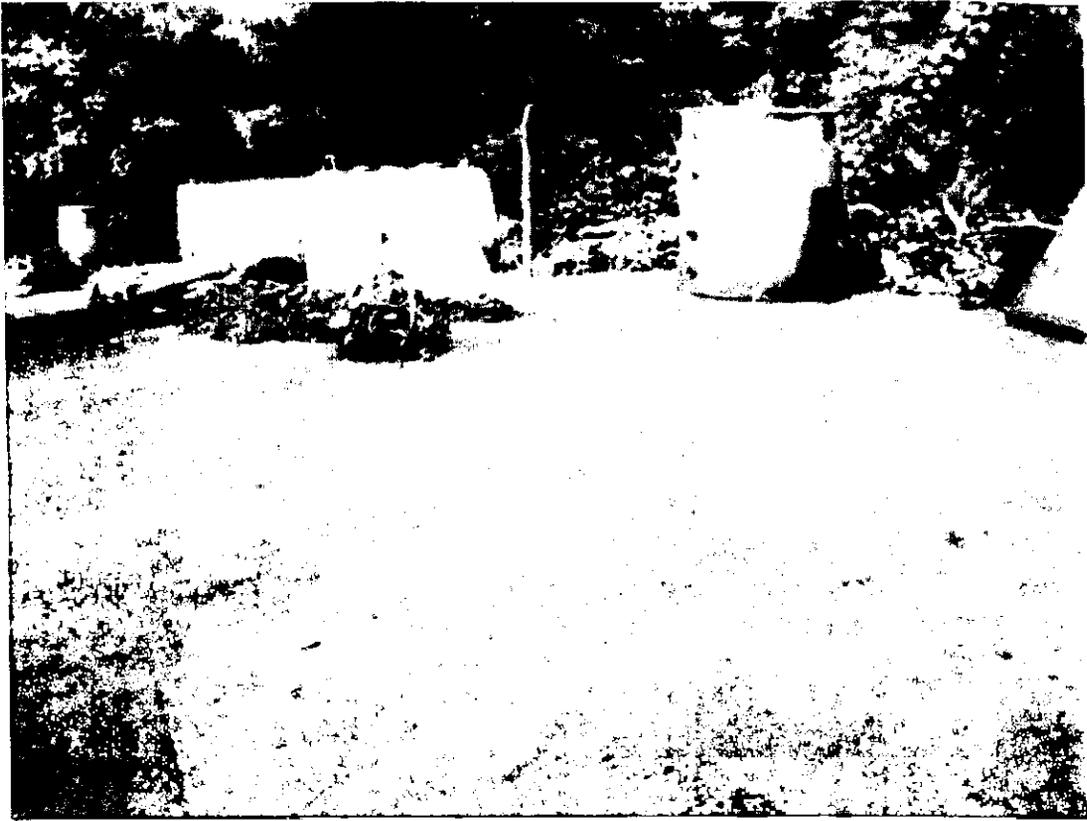


Figure 1: Car processing concrete pad. The oil residue is noticeable, the pad should be replaced and containment (i.e. containment dike) be installed.



Figure 2: Oil container on the car processing pad. This tank has secondary containment but needs to be labeled "Used Oil".

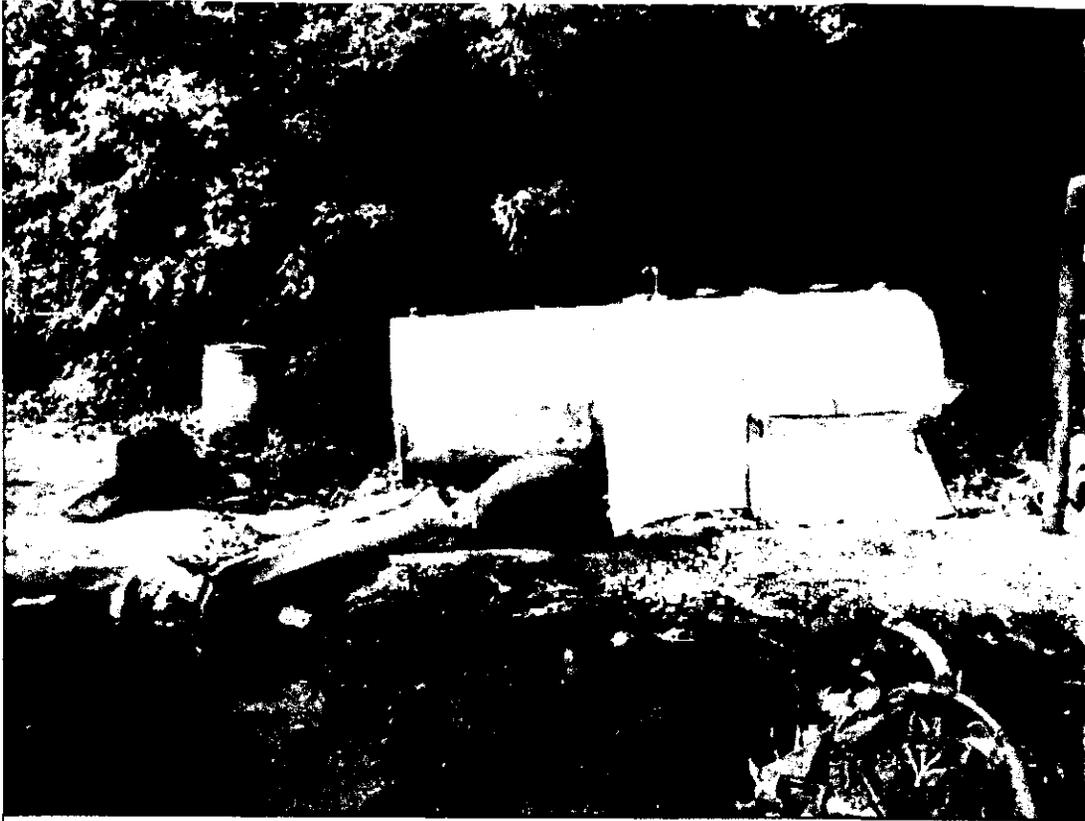


Figure 3: Anti-freeze tank by the car processing pad. This tank should be placed within secondary containment and labeled "Anti-Freeze".



Figure 4: Stormwater retention pond in the rear of the property near the car processing pad. This pond drains into the oil water separator.

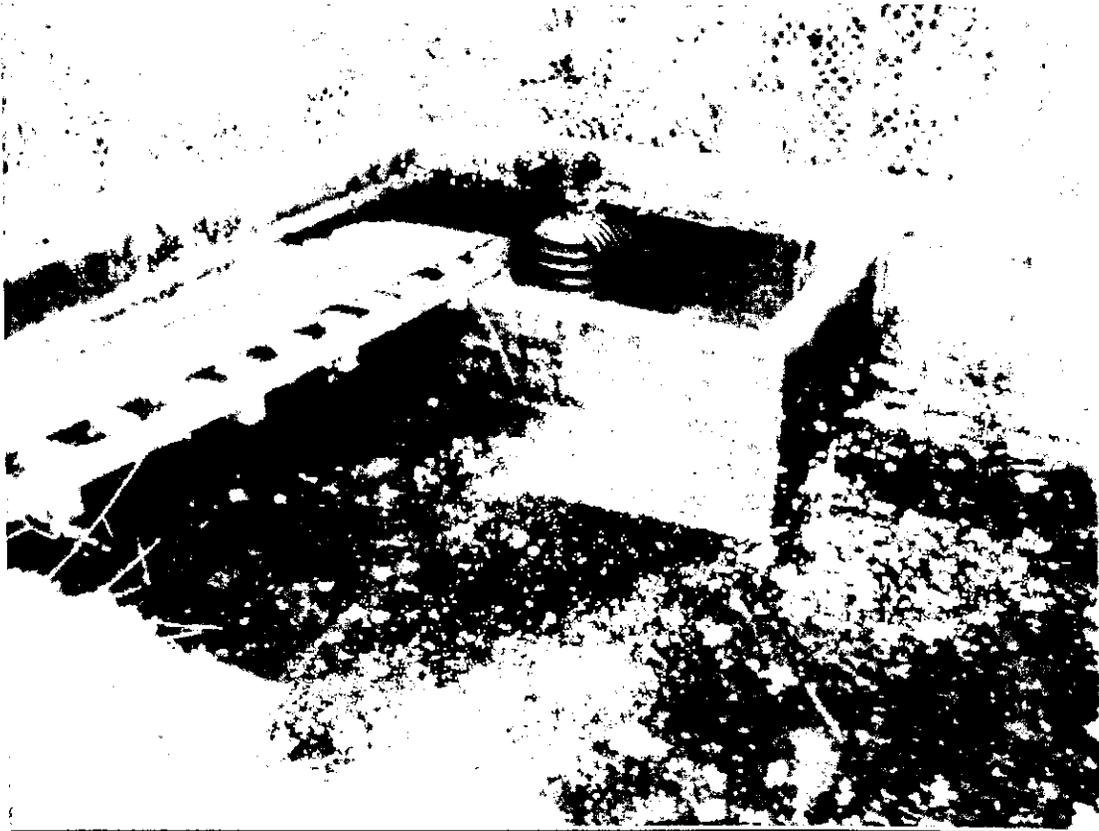


Figure 5: Riser pipe for the oil water separator along the back side of the property.



Figure 6: Oil water separator. There is a lot of floating debris in the water; the oil water separator should be kept clean to eliminate any possible clogs or discharges of pollutants.



Figure 7: Outfall from the oil water separator.



Figure 8: Outfall of the oil water separator. This area should be kept clear of any debris.