

**Environmental
Protection Agency**

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

July 6, 2011

RE: PEARL ROAD AUTO WRECKING
3GR00732*DG
STORMWATER
CUYAHOGA

Mr. Myron Kaplan
Pearl Road Auto Wrecking
5000 Pearl Road
Cleveland, OH 44109

Dear Mr. Kaplan:

On July 5, 2011 this writer conducted an inspection of your facility, located at 5000 Pearl Road, Cleveland, Ohio, to determine compliance with the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Industrial Activities #OHR000004 referenced above. Along with my observations from the inspection I have provided comments concerning your permit below:

General:

1. This site is the location of Pearl Road Auto Wrecking, a company which buys and sells used auto parts.
2. Storm water on site goes to catch basins which empty towards the street on the north east side of the property.
3. I was told that automobiles have all of their fluids drained upon arrival.

Inspection Observations:

1. While walking around the outside of the building I noticed a few areas of concern. I was told tires were to be stored in a dumpster near the west side of the main building and that they were picked up about once every month. However, many tires were piled up on the ground around this area (Figure 1). Tires should be stored indoors on tire racks or in a covered container, such as the dumpster covered with a lid or tarp. The tires should be picked up as soon as the dumpster is full so they are not sitting for extensive periods of time. Stockpiling tires is not suggested as they create both a fire hazard and a breeding ground for mosquitos and rodents.
2. There is a catch basin in the floor of the western garage building. I was told this drain was not functional and that water that collected in this catch basin had to be pumped out. Please be aware storm water collected from this drain may only be released if it is pure storm water. If there are any signs of oil or other

- contaminants in the collected water, it cannot be released to the storm sewers or storm water system, but should be hauled off site to be disposed of properly. It is recommended that this catch basin be filled permanently to eliminate this burden.
3. Many engines were sitting on the ground on the west side of the facility (Figure 2). It is preferred that engines be stored indoors. If they are not kept indoors, they must be stored off the ground or on a bermed cement pad, under the cover of a roof or tarp. A dumpster on the south side of the facility contained three or four engines. This is an acceptable method of containment as long as the dumpsters are checked to ensure that no holes or leaking is occurring and they are covered by a lid or tarp to prevent the collection of storm water and formation of leachate.
 4. Oil staining was seen in many spots in the yard (Figure 2). Spill kits containing oil dry and/or other absorbent material should be kept around the facility, especially near the crushing and dismantling areas. These spots should be cleaned up and any contaminated soil can be removed and disposed of with general trash.
 5. The area around the fuel tank (Figure 3) and crushing pad (Figure 4) showed some signs of staining. It is recommended that a bermed concrete pad be installed in this area under the tank and crusher. This would allow for collection of water, spilled fuel, and car "juices" from the crushing process in the area, preventing any contaminated water from these activities from entering the storm sewer system via drains or ditch. The water collected in the bermed surface could then be collected and hauled off site should it appear contaminated.
 6. A couple of unused totes (Figure 5) and dumpsters were sitting in the yard. These unused containers should be rid of if they are not going to be used to minimize your exposure.

Permit:

1. The Storm Water Pollution Prevention Plan (SWPPP) included forms for "Incoming Vehicle Inspections", "Visual Wet Weather Observations", and "Quarterly Inspections"; however, none of these forms were completed. These forms should be completed at intervals specified in the SWPPP and kept with the plan for review.
2. As required in part IV.D.4. of the NPDES permit, a Comprehensive Site Compliance Evaluation should be completed, at least once per year, and the results of said evaluation should be kept with the SWPPP for review.
3. As required in part IV.D.3.g. of the NPDES permit, the SWPPP must include a certification that the discharge has been tested or evaluated (does not necessarily require discharge sampling) for the presence of non-storm water discharges. The certification shall include:

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- a. The identification of potential significant sources of non-storm water at the site.
 - b. A description of the results of any test and/or evaluation for the presence of non-storm water discharges.
 - c. The evaluation criteria or testing method used and the date of any testing and/or evaluation.
 - d. The on-site drainage points that were directly observed during the test.
4. A record indicating topics covered in the employee training sessions should be included in the plan.

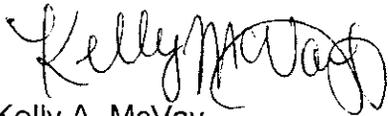
Action Items

- Store tires in a confined area and have them removed from the site frequently to avoid the hazards that come with stockpiling.
- Move engines indoors or off the ground and under cover.
- Consider installing a bermed concrete pad under the crusher and fuel tank to prevent the spread of spills.
- Provide spill kits in accessible places where they may be needed.
- Remove stained ground and implement good housekeeping methods to clean up future spills and leaks.
- Make aforementioned improvements to SWPPP.

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 July 20, 2011.

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

Sincerely,



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

KAM/mt



Figure 1: Tires piled outside.



Figure 2a: An engine on the ground with stains surrounding it.



Figure 2b: Engines sitting on the west side of the facility. Significant staining can be seen on the ground in these areas.



Figure 3: Fuel tank with stains surrounding it.



Figure 4a: Crushing area with some stained soils.



Figure 4b: Crushing area.



Figure 5: An unused tote sitting in the yard.