



**Environmental
Protection Agency**

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

September 13, 2010

**RE: PULL-A-PART
3GR01227*DG
STORM WATER
STARK COUNTY**
SUMMIT

Mr. Tracy Long
Manager
Pull-A-Part
1250 Kelly Avenue
Akron, Ohio 44306

Dear Mr. Long:

On September 10, 2010 this writer conducted an inspection of your facility, located at 1250 Kelly Avenue, Akron, Summit County, to determine compliance with your Industrial General Storm Water NPDES permit referenced above. Mr. Michael Summerville, Assistant Manager, accompanied me during the inspection. This site is very similar to the Canton facility which was inspected by this office in May 2010. Below you will find a summary of my observations:

General:

1. This site is an automobile salvage yard and is split into two main drainage areas. The back part of the site is a car storage yard; the front section near the building is the car processing area.
2. The majority of the drainage from the car storage yard flows into a storm drain near the northwest corner of the yard. This outfall is the testing location for the SWPPP. The car processing area drains by sheet flow to the southeast corner of the property.
3. All the cars are drained of their fluids (oil, gas, antifreeze, etc.) inside a building and all fluids are contained and drained into tanks located behind the building within secondary containment (dike).

Inspection Observations:

1. While walking around the main processing area we noticed a few areas of concern. The first area of concern is the concrete pad on which the car crusher sits. The area has no berm or secondary containment to control any residual fluids from the crushed cars. Pictures are attached for your reference. Mr. Summerville stated that the area is cleaned when crushed cars are shipped off site. Contaminated soils around the concrete apron are removed periodically and fresh stone applied. While not required, it is suggested that this area be roofed and a trench drain installed around the perimeter (under roof) to collect any stray liquids.

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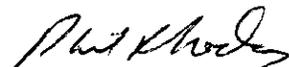
2. As mentioned in the letter for the Canton facility, storm water collected inside the dike area containing the car fluids is considered a wastewater and cannot be sprayed into crushed cars. You need to visually evaluate the collected water. If the storm water collected displays no visible sheen, or otherwise contains no visible contaminants, then it can be discharged in accordance with your storm water permit. One suggestion would be to use this water as dust control on your gravel area containing the salvage cars. The area chosen should be as far away from an open storm drain as possible. If the water only contains a sheen, remove the sheen with absorbent pads and proceed as described. If the water contains pollutants that cannot be removed easily with an absorbent, then it should be containerized and disposed at a properly licensed facility.
3. Consider putting up tarps around the fuel tanks to keep rainwater from building up in the diked in area.
4. Consider putting oil dry into barrels and place next to the car crusher area for easy accessibility.
5. Dumpsters located on site need to have covers to keep rain water from coming into contact with pollutants.

Permit:

1. Annual sampling is required at your facility. Please keep all records of monitoring info, copies of reports, sampling data, etc..., for at least 6 years from the date of origination as required in Part VI, C of the permit. These records should be kept on site as an appendix to the SWPPP.
2. The plan should contain specific storm water annual training dates and verification that training was conducted with the employees.
3. The SWPPP needs to be updated to include current staff members that will be part of the Pollution Prevention Team.
4. The certification for the SWPPP needs to be signed either by a manager or by a health and safety officer.

If you should have any questions concerning this letter, feel free to contact this writer at (330) 963-1136 or by email phil.rhodes@epa.state.oh.us.

Sincerely,



Philip P. Rhodes, P.E.
Environmental Specialist II
Division of Surface Water

PPR:cj

File: Industrial/Permit/ Compliance

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