

**Environmental
Protection Agency**

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

May 24, 2010

RE: PULL-A-PART
3GR01228*DG
STORMWATER
STARK COUNTY

Mr. Ken Purnell
Pull-A-Part
1551 Belden Ave
Canton, OH 44707

Dear Mr. Purnell:

On May 20, 2010 this writer conducted an inspection of your facility, located at 1551 Belden Ave in Canton, to determine compliance with your Industrial General Storm Water NPDES permit referenced above. Ken Purnell, the general manager and Philip Rhodes, Ohio EPA Environmental Engineer were also present during this inspection. Along with our observations from the inspection we have provided comments concerning your SWPPP below:

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. Drainage from the car storage yard flows into a storm drain near the southwest corner of the yard. The car processing area drains into a catch basin located near the center of the processing area.
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).
4. The car processing area drains to a catch basin which exits the property via outfall 001 to the industrial park's retention pond. This outfall is the testing location for the SWPPP.

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. You stated that the area is constantly policed to keep it clean. 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.
2. Periodically stormwater collected inside the fuel containment dike is pumped into barrels. This water is then disposed by introducing it into cars being crushed and taken to an off-site scrap yard. This water is considered a wastewater and the aforementioned disposal method is unacceptable. You need to visually evaluate the collected water. If the stormwater collected displays no visible sheen, or otherwise contains no visible contaminants, then it can be discharged in accordance with your stormwater 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

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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. Oil dry is located inside a large container, near car processing area, that is not easily accessible. 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 especially the dumpsters containing the radiators and transmissions.

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.

Action Items

- Cover and seal the dumpsters on site.
- Stop putting stormwater from the storage dike into cars.
- Update and sign the 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.

Sincerely,



David Rischar
Assistant to the District Engineer
Division of Surface Water

DR/mt



Figure 1: Storage area for crushed cars next to the crusher

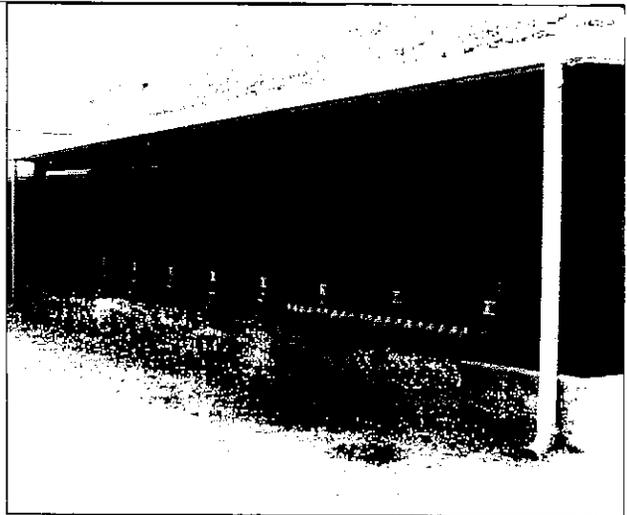


Figure 2: Secondary containment for drained fluids

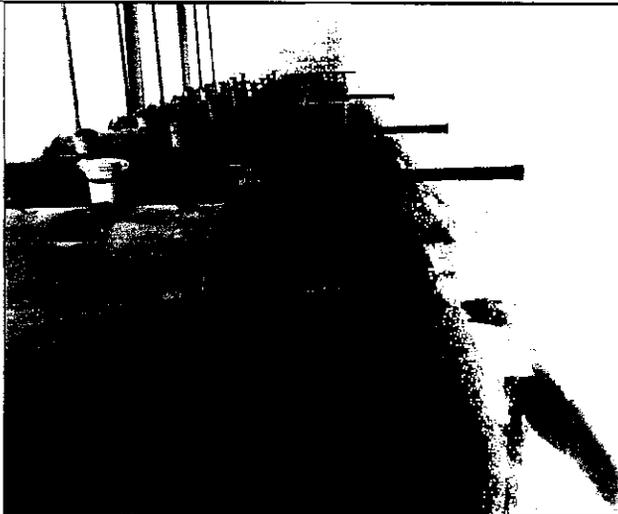


Figure 3: Water collecting inside secondary containment



Figure 4: Location of outfall 001 (testing location)



Figure 5: Overview of car crusher pad.



Figure 6: Car fluid extraction area