



Environmental
Protection Agency

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

June 22, 2011

RE: RIDGE ROAD AUTO PARTS & WRECKING
FACILITY #3GR00701*DG
INDUSTRIAL STORMWATER
CUYAHOGA COUNTY

Mr. Daniel Rothstein, Owner
Ridge Road Auto Parts & Wrecking, Inc.
3741 Ridge Road
Cleveland, OH 44144

Dear Mr. Rothstein:

On June 8, 2011 this writer conducted an inspection of your facility, located at 3741 Ridge Road, Cleveland, to determine compliance with the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for storm water associated with industrial activity #OHR000004. Dan Bogoevski of the Division of Surface Water (DSW) was also present during this inspection. Along with our observations from the inspection we have provided comments concerning your permit below:

General:

1. This site is the location of Ridge Road Auto Parts, a company that does automobile dismantling and parts resale.
2. An independent contractor crushes auto bodies at this facility several times per year on an as-needed basis.
3. The Storm Water Pollution Prevention Plan (SWPPP) indicates that storm water on the site runs off to the north along a highway drainage area to an unnamed tributary, eventually reaching Lake Erie. Interior floor drains in the Truck Runway Building, Wash Area, and Dismantling Area all go to a holding tank located on the east end of the building.

Inspection Observations:

1. Some staining due to leaks or spills of automotive fluids was seen on the ground in the Vehicle Holding Area (Figure 1). The SWPPP calls for a visual inspection of each vehicle upon arrival to ensure they are not leaking. Drip pans, absorbent pads and other spill response measures are to be implemented if leaks are noted. This issue can also be addressed by draining all fluids immediately when a vehicle is brought on site to remove the source of pollutants. If spills do contact the ground, a spill kit should be used to clean up the spill and contaminated soils should then be removed and disposed of properly.
2. Two 55 gallon drums of antifreeze were located just inside of a door in the Dismantling Area (Figure 2). These drums should be stored on a containment tray or be relocated to an area further away from the door to prevent exposure to storm water in the event of a spill.
3. It is suggested that automobile crushing operations be relocated to a bermed concrete pad.

4. The Core Scrap Storage Area is roofed and the floor is intended to drain to a holding tank. However, it appears that the floor along the north side of the pad was not set to the proper grade when it was constructed, allowing fluids to flow out from under the roof. This allows pollutants to become exposed to storm water. Absorbent booms were in place at the time of inspection and a few were in need of replacement (Figure 3). As discussed, the addition of a permanent curb or berm should be considered or these absorbent booms must be inspected and changed with greater regularity.
5. A tote and two smaller containers of used oil were left outside near the Used Oil Tank in the Fluid Management Area. These containers should be stored inside per the SWPPP.
6. In the Outside Parts Storage Areas on the north and south sides of the building, there were signs of oil and rust staining under the shelving units (Figure 4). BMPs and good housekeeping measures should be implemented to capture spills from leaking parts and keep these areas clean. The shelves that were located near a storm drain by the C Building should be relocated as staining indicated some contaminated fluid had made its way to the storm drain.
7. The general trash dumpster on the north side should be lidded or covered with a tarp to prevent collection of storm water and creation of leachate (Figure 5).
8. At the time of inspection it was unknown whether the floor drain inside the C Building went to sanitary or storm sewers. If this drain goes to storm sewers, the sink water cannot be discharged into the drain and the floor in the building should either be cleaned or the floor drain should be capped permanently (Figure 6).
9. The floor drain in Building B has been permanently capped.

Permit:

1. Based on the SWPPP, it was unclear if water on site was entering a sanitary, combined, or storm sewer system. This information should be updated and made clear on the maps and in the plan. The floor drain in the C Building should be investigated to find if it connects to storm or sanitary sewer and added to the map along with all other indoor drainage points, if they are connected to storm sewers. Scott Boroski at the Northeast Ohio Regional Sewer District (NEORS) may be of assistance to you in making this determination. You can contact him at (216) 881-6600.
2. All stormwater outfall locations should be identified with designated numbers (e.g.: 001, 002, etc.) on the map.
3. Employee training must be conducted at least once per year as required in Paragraph D.7.b.9 in Part IV of the permit. Records of scheduled training dates, topics covered, and attendance should be added as an appendix to the SWPPP and kept for no less than 6 years.
4. All updated portions of the plan should be added to the SWPPP binder and old portions should be removed and stored separately.
5. Comprehensive site compliance evaluations must be conducted at least once per year as required in Paragraph D.4 in Part IV of the permit.

Action Items

- Clean up and prevent any spills or leaks in the Vehicle Holding Area.

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- Move antifreeze drums further from door in the dismantling area or put them on a containment tray.
- Regularly replace absorbent booms in covered outdoor storage area or install a permanent curb to contain spills on the concrete pad.
- Store all totes and containers of used oil indoors or under cover.
- Implement good housekeeping BMPs for the Outdoor Parts Storage Areas. Keep these areas clean and leaking parts must be kept away from storm drains.
- Keep dumpsters closed or covered by a tarp.
- Determine if your storm water discharges to a separate or combined sewer system.
- Find out if the floor drain in the C Building discharges to storm or sanitary sewer.
- Make aforementioned changes 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 5, 2011.

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

Sincerely,



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

KAM/mt

cc: Maurice Leiser, Ridge Road Auto Parts
Scott Boroski, NEORS
Rachid Zoghaib, City of Cleveland, Department of Water Pollution Control



Figure 1: Oil stains in vehicle holding area

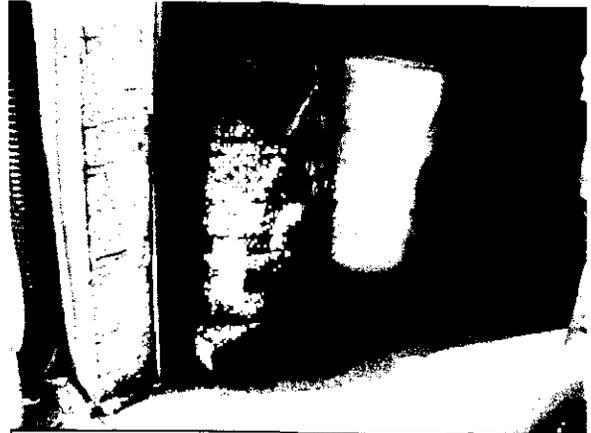


Figure 2: Drums of antifreeze located near door



Figure 3: Outside storage area with absorbent booms in need of replacement



Figure 4a: Staining around outdoor shelving unit



Figure 4b: Staining near outdoor shelving area which leads towards a storm drain



Figure 5: Open dumpster



Figure 6: An unknown drain (behind yellow crate) in the C-building with sink draining into it and dirt and debris surrounding it