

**Environmental
Protection Agency**

Governor

Lt. Governor

Director

October 4, 2011

RE: TRUMBULL COUNTY
BAZETTA TOWNSHIP
BOB KARL'S AUTO WRECKING
NPDES PERMIT NO. OHR000004
OHIO EPA PERMIT NO. 3GR00201*DG
INDUSTRIAL STORM WATER

David Karl
Bob Karl's Auto Wrecking
2315 Elm Road
Cortland, OH 44410

Dear Mr. Karl:

On September 6, 2011, Ohio EPA conducted an inspection of Bob Karl's Auto Wrecking, located at 2315 Elm Road, Bazetta Township, Trumbull County (facility). During the inspection, I was accompanied by Tomás Parry of Ohio EPA. The facility was represented by Rob Bianco. Ohio EPA records indicate that the facility is covered by General National Pollutant Discharge Elimination System (NPDES) Permit for Storm Water Associated with Industrial Activity (General Storm Water Permit), permit No. 3GR00201*DG. The inspection documented the following:

General Information

The facility's industrial activities are currently classified under U.S. Department of Labor's Occupational Safety and Health Administration's Standard Industrial Classification (SIC) Code 5093: Scrap and Waste Materials.

Storm Water Pollution Prevention Plan (SWP3)

The facility's SWP3 states that storage tanks are located outdoors. With the exception of gasoline, storage tanks are currently located indoors under roof. The SWP3 must be revised to be reflective of this change.

Facility Inspection

The facility's SWP3 must be revised to incorporate or install Best Management Practices (BMP) necessary to address the following deficiencies:

- An above ground gasoline tank was observed at the facility. Mr. Bianco was unaware if the above ground gasoline tank was double walled. Please verify that the above ground gasoline tank is double walled or provide secondary containment with a design to hold 110% of the above ground gasoline tank's volume. In addition, a spill kit must be located in the above ground gasoline tank to address spills or leaks that may occur during refueling events.

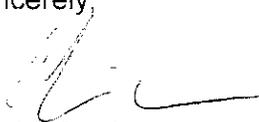
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- Part V.B of the General Storm Water Permit requires monitoring for oil and grease, chemical oxygen demand, total suspended solids, pH, duration of storm event, precipitation, duration between storm events, volume for facilities with storm water discharges associated with industrial activity that are from those areas at automobile junkyards with any of the following:
 - a. Over 250 auto/truck bodies with drivelines (engine, transmission, axles, and wheels), 250 drivelines, or any combination thereof (in whole or in parts) are exposed to storm water;
 - b. Over 500 auto/truck units (bodies with or without drive lines in whole or in parts) are stored and exposed to storm water; or
 - c. Over 100 units per year are dismantled and drainage or storage of automotive fluids occurs in areas exposed to storm water.

During the inspection, Mr. Bianco was unable to provide the information necessary to determine which category the facility falls into.

Please provide Ohio EPA with a letter of response detailing which category the facility falls into. The letter of response must also include any monitoring that was performed over the previous two (2) years. Should you have any questions regarding this matter, please contact me at your earliest convenience at (330)963-1118 or via e-mail chris.moody@epa.ohio.gov.

Sincerely,



Chris Moody
Environmental Specialist II
Division of Surface Water

CM/cs