



Environmental
Protection Agency

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

August 28, 2012

Mr. Rick Pardini, Owner
Lindale Auto Parts, Inc.
2976 State Route 132
P.O. Box 17
New Richmond, OH 45157

RE: Industrial Storm Water Inspection; NPDES Permit 1GR00007*EG, Sector M

Dear Mr. Pardini:

On Monday, August 20, 2012, I inspected Lindale Auto Parts to determine compliance with its industrial storm water discharge permit. I walked the site on my own after first meeting with you to discuss the scope and intent of the inspection.

Based on my observations, and our discussion, there are no significant violations of the permit. Fluids are removed from wrecked vehicles that are brought to an indoor shop, and oils are collected and stored for use during winter months to fire the shop's furnace. Gasoline that is sometimes present in wrecked vehicles destined for salvaging is removed and provided to employees. A mobile car crusher comes to the site periodically to prepare vehicles that are free of fluids for transport off site to a metal shredding facility. These practices go a long way toward reducing the exposure of wastes and other collected materials to rainfall, much of which could drain from the property as runoff.

Near the site's northeastern corner, a single metal drum full of (what's assumed to be) used oil, or oily sludge, was observed sitting on the ground, surrounded by an area of dark stained soil. It appears the drum has been left open, and rainwater has displaced the lighter oil, causing it to leak out and creating a stain perhaps three or four times the size of the diameter of the drum. It was not raining at the time of this inspection, but based on where staining was observed it did not appear that oil has been carried off the property in storm water runoff. Regardless, current waste management regulations require used oil containers to be kept closed unless material is being added or removed, and labeled with the words "Used Oil".

It would be wise to dispose of this material since it did not appear suitable for burning in your shop's used oil furnace. If it is to remain on the site, after being closed and labeled it should be stored where it won't be accidentally knocked over or punctured.

Lindale Auto's industrial storm water permit has several requirements that need to be addressed before the company can be considered fully compliant. The permit can be downloaded from the following link to Ohio EPA's website:

http://www.epa.ohio.gov/portals/35/permits/IndustrialStormWater_Final_GP_dec11.pdf

(The entire permit is 141 pages long, but only about 35 pages will apply to auto salvage facilities, which fall in to Sector M.)

1. Storm Water Pollution Prevention Plans (SWP3s)

Regulated companies are required to create and implement a storm water pollution prevention plan. The plan may not be that useful to the company in its day to day operations since you and your employees know how to run your site without having to reference such a plan. The requirement to create and implement a site specific SWP3 proves to regulators that the company has considered all the possible sources of storm water contamination at its site, and describes, in writing, how the company's activities serve to reduce these impacts.

A key part of any SWP3 will be a map of the company's property showing potential pollutant sources, and the directions in which storm water runoff flows. Details on other things that SWP3s should contain are found on pages 23 and 24 of the permit.

2. Quarterly Visual Assessment of Storm Water Discharges

All companies covered under this "multi-sector" general industrial permit are required to assess samples of storm water runoff collected from their property on a quarterly basis. Samples are to be collected at points where runoff leaves the property. Details of what to look for in collected samples can be found on page 19 of the permit. Information obtained from these assessments must be documented and kept at the site, and must be made available to Ohio EPA upon request.

3. Benchmark Monitoring of Storm Water Runoff

Industrial sites are required to perform "benchmark" monitoring of storm water runoff that is discharged from their property. The types of pollutants to be monitored will depend on the industrial sector in question. Information about benchmark monitoring begins on page 30 of the permit, and details about the pollutants Sector M (auto salvaging) facilities are required to look for (total suspended solids, total aluminum, and total lead) are found on pages 66-67.

Benchmark monitoring requirements call for four samples to be obtained during the first three years in which the permit is in place, beginning January 1, 2012. Sampling can be done at any time within this three year period, so long as each of the four seasons is represented. Once all sampling has been completed, the results are to be averaged, then

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compared to the benchmark concentrations established by U.S. EPA for particular pollutants. If results are higher than U.S. EPA's levels, then regulated companies must improve their operations to reduce the levels of pollutants that are being carried away in storm water runoff.

Other portions of the storm water permit that will have relevance to Lindale Auto's operation include facility inspections (Section 4, beginning on page 17), and reporting and recordkeeping (Section 7, beginning on page 33).

Within 60 days of receipt of this letter, please provide a rough draft copy of the SWP3 written for Lindale Auto. If you'd like to send sections of the plan as it is being written to be sure it's on the right track, feel free to email me accordingly, using the address that's on my business card.

If you have questions about anything in this letter, I can be contacted at 937.285.6442.

Sincerely,



Chris Cotton
Environmental Specialist II
Division of Surface Water

CC/ff

cc: Ohio EPA/DSW/SWDO Files

