



**Environmental
Protection Agency**

Robert Taft, Governor
Richard Cordusio, Lt. Governor
Lynne F. Brown, Director

September 4, 2012

Paul Baker Sr.
All City Auto Wrecking
1547 Joyce Avenue
Columbus, OH 43219

**Re: Storm Water Investigation at All-City Wrecking
Permit #4GR00298*DG/ Franklin County
Notice of Violation**

Dear Mr. Baker:

This letter is written in follow-up to a storm water inspection I conducted with Paul Baker Jr., at All-City Wrecking located at 1457 Joyce Avenue in Columbus Ohio on August 28th, 2012. This letter also serves as a formal Notice of Violation for failing to implement appropriate Best Management Practices to minimize storm water pollution and for failing to renew storm water permit coverage as required by 40 CFR 122.26 and OAC 3745-39. Based on my inspection and the current storm water regulation, the following items were noted:

Storm Water Permitting

- In accordance with 40CFR122.26 this facility must update coverage under the new Multi-Sector General Permit (MSGP). The initial coverage for the storm water permit at this site has expired. Renewed coverage must be addressed within 7 days of receipt of this letter.

Storm Water Pollution Prevention Plan (SWPPP)

- A SWPPP must be updated in accordance with the new conditions set forth in the in MSGP. Please refer to the guidance document at the following link to assist you in the process: http://cfpub.epa.gov/npdes/stormwater/msgp.cfm#msgp2008_swppp. Upon final development of your SWPPP, please submit the plan to my attention within 14 days of completion. Please note the SWPPP must be updated within 180 days.

Dismantling Area

- During the inspection I had the opportunity to evaluate the dismantling area associated with this project. During the time of the inspection I noted abundant oil staining and used fluids associated with the dismantling process (SEE FIGURES 1 & 2). It is apparent that the current Best Management Practice associated with receiving and dismantling of all cars is failing. At this time, all stained soils and used motor fluids within the receiving and dismantling area must be remediated and properly disposed. *At this time I am formally requesting the corrective measures necessary to remediate the soils and ensure proper disposal within 3 days of receiving this letter. Please note I will be evaluating this process and disposal receipts for the stained soils.* Feel free to contact David Hohmann (tel. 614-728-3885) regarding used oil compliance requirements, and/or refer to Ohio EPA's used oil generator guidance online at <http://goo.gl/Xlc1Q>.

Additional Storm Water Management Practices

- Additional storm water management practices are expected for the dismantling area. I have noted the installation of a cover in association with receiving/dismantling area. However, a trench drain which leads to a blind sump must be installed to collect the fluid concurrent with the receiving and dismantling of all automobiles at this site or demonstrate an approvable alternative. *This measure is expected within 30 days from receipt of this letter.*
- A centralized secondary containment area must be developed for the storage of all fluids associated with this site. During the inspection I noted barrels scattered throughout the yard with indications that anti-freeze and used oil were stored within the barrels. Secondary containment must be provided for all used fluids. All barrels must be properly identified with respect to their content. In addition there are expectations that oil, gas, radiator fluid, transmission fluids, and brake fluids are drained upon intake of used automobiles at this facility. The amended storm water pollution prevention plan must clearly address the dismantling process and the associated protocols to ensure all fluids are drained and properly stored in a centralized containment area.
- All used engines and transmissions should be stored in areas under roof. I have addressed this issue concurrent with previous inspections at this site.

Oil Water Separator

- Please demonstrate the oil water separator is monitored and cleaned out. In addition a monitoring port must be developed to ensure the oil water separator is working as intended. The new MSGP requires monitoring of this storm water outfall.

If you have any questions regarding this letter or the inspection, please do not hesitate to call me at our Central District Office at (614) 728-3844 or email at harry.kallipolitis@epa.state.oh.us. In addition, please provide a written response (*email preferred*) to the action items addressed above within ten days from receipt of this letter. A follow-up inspection will be conducted to ensure the minimum conditions of the General Permit are met.

Sincerely,



Harry Kallipolitis
Storm Water Coordinator
Division of Surface Water
Central District Office

- c. Jeff Cox, City of Columbus
Dave Hohmann
Adam Ward
Melissa Storch



Figure 1 Breakdown and Fluid Draining Area



Figure 2: Breakdown and Fluid Draining Area