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COMPLIANCE PLUS SERVICES

October 24, 2013

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EPA REGION III
OCT 25 2013
NPDES ENFORCEMENT BRANCH
(3WP42)

RECEIVED
EPA REGION III
OCT 25 2013
NPDES PERMITS BRANCH
(3WP41)

Via UPS Ground

Allison Graham
US Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, Pa 19103-2029

RE: Response to Information and Observations Contained in the September 25, 2013 U.S. Environmental Protection Agency ("EPA") NPDES Industrial Stormwater Inspection Report for Super Salvage, Inc. 1711 1st St., SW, Washington, DC 20024

Dear Ms. Graham,

Pursuant to your September 25, 2013 correspondence, Compliance Plus Services, Inc. ("CPS") is providing the following comments, as well as the supplemental information referenced herein, on behalf of Super Salvage, Inc. ("SSI"), related to the observations made by the U.S. Environmental Protection Agency ("EPA") during the Clean Water Act inspection conducted at the SSI facility on February 20, 2013. These observations were presented in the final NPDES Industrial Storm Water Inspection Report dated September 25, 2013 as referenced above.

The comments and responses provided below are provided on behalf of SSI and were prepared based on information and consultation with Mr. Robert Bullock, Chief Financial Officer of SSI.

General Comments:

SSI acknowledges that the facility is not currently authorized under the 2008 Multi-Sector General Permit (MSGP), nor did it obtain a "No Exposure Exclusion". However, SSI would like to note that due to the construction of the berm at Entrance #1 to the facility in 2000, which the Company believed eliminated any direct discharge of stormwater, (as defined in 40 CFR 122.2), that were exposed to industrial activities or materials, SSI did not believe it was subject to MSGP permit requirements. Based on this belief, no Stormwater Pollution Prevention Plan (SPPP) or Spill Prevention, Control and Countermeasures Plan (SPCC) was developed or implemented at the site.

While no written SPPP is in place, SSI has historically monitored stormwater and has made some effort to reduce its exposure to industrial activities and materials. Similarly, while no written SPCC plan is in place, Super Salvage has historically contained and cleaned up minor spills of oil or other possible pollutants as they have occurred. Additionally, as indicated in its response

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Premier Industry Provider of Environmental and Safety Services
P.O. Box 186
Hatboro, PA 19040
Ph: 215-734-1414 Fax: 215-734-1424
1-866-976-PLUS (7587)

to the Agency's Request for Information, SSI is currently in the process of evaluating its potential to discharge oils into or on the navigable waters of the United States as part of its development of an SPCC Plan. Nevertheless, SSI believes that: 1) there has never been a discharge of petroleum materials from its facility that has impacted the navigable waters of the U.S., and 2) based on its current site controls, this potential has been minimized.

Contrary to the comment regarding the maintenance of the large stormwater retention pond on Page 3 of the report, Mr. Bullock has since determined that the pond was pumped out at least three times over the past several years. Service invoices for two occasions when the pond was vacuumed out are included as Attachment 1.

Comments on Observation 1:

Mr. Bullock has no record of SSI ever receiving the Illicit Discharge Investigation Report, dated March 30, 2010, prepared by the District Department of the Environment (DDOE). The first time Mr. Bullock had an opportunity to review the report was after the receipt of the document as Appendix D in the September 25, 2013 EPA Inspection Report.

Comments on Observation 2:

The EPA's observations of the large retention pond occurred on a day following a rain event that has been preceded by several weeks of dry conditions. SSI believes this wash of stormwater runoff across areas of dried or caked residue onsite exaggerated the oily layer and conditions of the retention pond.

Comments on Observation 3:

Photograph 23 depicts the 1,600 gallon hydraulic fluid tank used to run the large sheer. The system operates between 1,500 – 3,300 psi and, at this pressure, occasional leaks can occur in the piping and around the seals. Following a discovery of a leak during operation, the fluid is covered with absorbent material. The floor is periodically cleaned and the used absorbent is placed in drums into the secondary containment area located outside of the office while awaiting offsite disposal. A systematic replacement of the original piping with new stainless steel material is being considered, however, SSI has not yet found a capable fabricator for this project, but is continuing to search.

Comments on Observation 4:

The drum in Photographs 3 and 4 is a transfer drum used to transport new hydraulic oil from the 300 gallon storage tank (Photographs 71/72) to the desired equipment. Photograph 70 depicts used oil filters awaiting disposal.

Comments on Observation 5:

The 500 gallon diesel tank is double-walled and located at least 25 feet from traffic flow. It was SSI's understanding that no additional secondary containment is needed for double-walled tanks. Additionally, please note that the nearby large oxygen tank, shown in photograph 54, was empty and awaiting removal. The drum referenced in Photographs 34 and 44 is an empty drum that is stored upside down to prevent the collection of rain water. The drum is used to burn broken pallets when needed. Photograph 16 depicts car batteries properly stacked on pallets and shrink wrapped awaiting shipment off-site. Photographs 24-28 depict piles of stainless steel awaiting processing by the bailer.

The "fluid" pooling in the photographs is rain water from the previous night. Additionally, Photographs 27 and 28 depict aluminum piles also awaiting processing by the bailer. Photographs 63 and 64 depict rainwater from the previous night draining out of the containers located on the adjacent property. It should be clarified that the property is leased by Virginia Concrete from the District of Columbia and is used by SSI with Virginia Concrete's permission.

Comments on Observation 6:

Photographs 67 and 68 depict close-up views of the containment area which is specifically designed to contain oil. The amount of oil appears greater due to the rain water contained underneath.

While the inventory of oil in large storage tanks and 55-gallon drums is in excess of the 1,320 gallon capacity requirement of a SPCC plan, it has not been satisfactorily determined if the oil could reasonably discharge into or upon navigable waters or adjoining shorelines of the U.S. An SPCC plan is currently being developed for SSI by CPS. During the preparation of the plan, an evaluation of the geography and location of the SSI facility will be performed to determine the applicability of the SPCC plan requirements pursuant to 40 CFR 112.1.

Comments on Observation 7:

As indicated above, SSI does not currently have a SPPP Plan that specifies employee training. Consequently, the only stormwater training provided to employees is for pumping of the stormwater that has collected in the small runoff collection area in the center of the facility to the large stormwater retention pond located in the southwest corner of the facility. As previously stated, a SPPP Plan is being developed for the site which will include applicable employee training provisions.

Comments on Observation 8:

It is SSI's belief that it cannot be conclusively determined if the tracks near Entrance 2 (north east corner of site) leading onto DC streets are sediment residue from SSI or Virginia Concrete. Virginia Concrete trucks pick up and deliver cement trailers frequently from their lot which also exits onto Potomac Avenue. SSI only occasionally traffics trucks from that lot when picking up a roll-off container for delivery to a customer.

SSI utilizes a rotary brush attachment on the Bobcat to clean the paved areas within the facility on a weekly basis. The curb on the SSI owned side of 1st Street is also cleaned weekly when the block is free of parked vehicles (typically on Saturday mornings).

Comments on Observation 9:

As indicated above, SSI did not believe that it was subject to the storm waste discharge provisions and, consequently, had not developed a SPPP Plan that included provisions for routine facility stormwater inspections. Formal stormwater inspections will begin and be recorded as soon as SSI is authorized under the MSGP and a written Stormwater Pollution Prevention Plan is in place.

Comments on Observation 10:

As indicated in SSI's comments to Observation 9, the facility had not secured the MSGP based on SSI's belief that a discharge permit did not apply to its facility. Formal Quarterly visual assessments will begin and be recorded as soon as SSI is authorized under the MSGP and a written SPPP is in place.

The background of the riser structure was researched by Mr. Bullock. Former employees Joel Kaplan (1960's- 2005) who was formerly responsible for stormwater reporting and Paul Kaplan (1970's- 1998) were both contacted and neither of them could recall the installation, purpose or discharge location of the riser. Neither of them could recall the water ever getting high enough

to overflown into the riser. A representative from DC Water was also contacted regarding sanitary sewer lines servicing this area and no historical information on the riser was available.

Comments on Observation 11:

SSI acknowledges that there was no written SPPP in place before the time of the inspection; however, there is an effective operational plan in place to contain stormwater within the boundaries of the facility and limit exposure of stormwater to industrial activities and materials whenever, possible.

SSI requests that these clarifications and supplemental information be included in the EPA's final compliance determination process. If you have any questions related to the comments or information provided herein, please don't hesitate to contact me at 215-734-1414 or by email at mlogan@cps-2comply.com.

Sincerely,

Michael D. Logan

Michael D. Logan
Vice President of Environmental Services
Compliance Plus Services, Inc.

Enclosure: Attachment 1: Retention Pond Service Invoices

cc: Robert Bullock, CFO – Super Salvage, Inc.

N:\#0326 - Super Salvage, Inc\0326-02 - Response to EPA Inspection Report\EPA Inspection Report Response Letter.docx

Attachment 1

Retention Pond Service Invoices

9/12/13
240326 0051 NIS

(301) 937-8611 NIS
~~1-800 336-8611~~ Sex line
Fax # 937-9028
FID 52-1340142

Tri County Industries

5005 Powder Mill Road
P.O. Box 1467
Beltsville, MD 20704-1467

Super Salvage
1711 First Street SW
Washington DC 20024

INVOICE No. V-001390

Dec-03-1997

Attn: Mike
Phone: 202-488-7157

SITE: 1711 1st Street SW
Washington DC

Your Order No.
Our Order No. S/J

SUPERS

	Shipped Via: TCI			Salesman: SWW	F.O.B.
DATE	DESCRIPTION	UNIT	QTY.	UNIT RATE	TOTAL
26-Nov	Liquid Disposal of Product	gal	1800	$0.50	$900.00
	Vacuum Pumping Services	hour	4	$75.00	$300.00
	TOTAL INVOICE				$1200.00

Payment Terms
Net 30 Days

FCC environmental

Please Remit Payment To
FCC Environmental, LLC
P.O. Box 674156
Dallas, Texas 75267-4156

INVOICE NUMBER 0313951

INVOICE DATE 09-08-10

SHIP TO: SUPER SALVAGE
1711 FIRST ST SW

WASHINGTON DC 20024-0000
78140301

TO:

SUPER SALVAGE
ATTN ACCOUNTS PAYABLE
1711 FIRST ST SW
WASHINGTON DC
20024

SITE NUMBER

701403
ATTN: PAUL KAPLAN
PH#: 202-488-7157

YOUR PURCHASE ORDER	SERVICE ORDER NUMBER	WORK DATE	SALES DISTRICT	SERVICE CENTER
CREDIT CARD	3586219	08-27-10	78	79
TERMS OF PAYMENT				
UPON RECEIPT				

QUANTITY	DESCRIPTION		UNIT PRICE	TOTAL
10.50	P/N:M-LABORLUMP	TECH & SUPERVISOR	105.00	1,102.50
1.00	P/N:M-MISCMATLR	BILLING FOR MISC MATER	600.00	600.00
750.00	P/N:COL-OWGA	OILY WATER GA	0.35	262.50
10.50	P/N:M-VAC 08-27-10	VAC SERVICES CHARGE	125.00	1,312.50
8.50	P/N:M-VAC	VAC SERVICES CHARGE	125.00	1,062.50
8.50	P/N:M-LABORLUMP	TECH & SUPERVISOR	105.00	892.50
1.00	P/N:M-MISCMATLR	BILLING FOR MISC MATER	600.00	600.00
300.00	P/N:COL-OWGA	OILY WATER GA	0.35	105.00
	Any questions regarding this invoice, please call 1-888-749-8344.		SALES TAX	214.50

Federal Tax I.D. # 45-0560557

ORIGINAL INVOICE

PLEASE PAY THIS AMOUNT $6,152.00