U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION III
CLEAN WATER ACT
COMPLIANCE INSPECTION REPORT

for

Name of Facility: Super Salvage, Inc.
Facility Address: 1711 1st St SW Washington, DC 20024
Mailing Address: 1711 1st St SW Washington, DC 20024

Report Prepared on: May 17, 2013 (*Date*) By: _____ (*Signature*), ERG

Report Final as of: _____ (*Date*) By: _____ (*Signature*), EPA

General Information

Type of Facility:	Industrial	**SIC Code:**	5093
Activity/Product:	Scrap Recycling Facility		
Owner:	Super Salvage, Inc.		
Operator:	Super Salvage, Inc.		
Permittee:	Unpermitted		
NOI Submittal Date:	No NOI submitted		
NOI Tracking Number:	No NOI submitted		
Effective Date of Coverage:	Unpermitted		
SWPPP Development Date:	No SWPPP developed		
SWPPP Developed By:	No SWPPP developed		
Site Area:	Approximately 1.3 acres		
Receiving Water and/or MS4:	Anacostia River via MS4		

A site map and vicinity map for the Super Salvage, Inc. are provided in Appendix A.

On-Site Inspection Overview

Inspection Date: February 20, 2013
Entry Time: 1:40 pm EST
Exit Time: 3:30 pm EST

Name	Title/Affiliation	Telephone
Inspectors:		
Allison Graham	Inspector – USEPA Region 3	(215) 814-2373
Kathleen Wu	Inspector – ERG	(703) 633-1625
Mark Briggs	Inspector – ERG	(989) 345-7595
Site Representatives:		
Robert Bullock	Chief Financial Officer - Super Salvage, Inc.	(202) 488-7157
Other Participants:		
Adion Chinkuyu	Inspector – District Department of the Environment (DDOE)	(202) 535-2193

Credential Presentation:

Ms. Allison Graham with USEPA Region 3 presented credentials to Mr. Robert Bullock of Super Salvage, Inc. (Super Salvage or the Facility) upon arrival at the Facility. Ms. Graham explained that the purpose of the inspection was to evaluate compliance with the 2008 USEPA Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP). The EPA Inspection was comprised of Ms. Graham, Ms. Wu and Mr. Briggs.

Weather and Precipitation:

Overcast and partly sunny conditions with temperatures in the low 40°F range were experienced during the inspection. National Oceanic and Atmospheric Administration (NOAA) National Weather Service rainfall data prior to the inspection are provided in the table below.

Rainfall Data Prior to Inspection of Super Salvage, Inc.

Date	Rainfall Amount (inches)[a]
February16, 2013	0.02
February 17, 2013	0.00
February 18, 2013	0.00
February 19, 2013	0.08
February 20, 2013	0.00

a. Recorded at Washington Reagan National Airport.

Documentation:

According to Mr. Bullock, the Facility did not submit a Notice of Intent (NOI) for Storm Water Discharges Associated with Industrial Activity under the NPDES Multi-Sector General Permit and did not have coverage under the 2008 USEPA Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP). In addition, the Facility did not obtain a "No Exposure Exclusion", has never developed a Storm Water Pollution Prevention Plan (SWPPP), a Spill Prevention, Control and Countermeasures Plan (SPCC), nor have they conducted any formal self inspections. When asked by the EPA inspection team to identify the Facility's Standard Industrial Classification (SIC) Code, Mr. Bullock provided an unusual answer that was not related to the question posed. According to

40 CFR 122.26(b)(14) "*stormwater discharges associated with industrial activity* means the discharge from any conveyance that is used for collecting and conveying stromwater that is directly related to manufacturing, processing or raw materials storage areas at an industrial plant. As per the SIC Code for scrap yards, Super Salvage, Inc. is considered to be engaging in "industrial activities" as defined in 40 CFR 122.26(b)(14); thus subject to an NPDES permit for stormwater discharges associated with industrial activities.

Photographs taken by Ms. Allison Graham, EPA Region 3, during the inspection are provided in Appendix B. A reconnaissance photograph showing the exterior of the Super Salvage facility taken on February 11, 2013, is provided in Appendix C. Following the inspection, the District Department of the Environment (DDOE) provided EPA with an Illicit Discharge Investigation Report for Super Salvage dated March 30, 2010, which is provided in Appendix D of this report.

Description of Industrial Operations

Super Salvage is located in Southwest Washington, D.C. and sorts, processes, and recycles scrap metals and other materials on site. The locations of the site's large runoff collection pond, the small runoff collection pond, magnetic crane, and both entrances observed by the EPA inspection team are identified on a 2012 Google Earth® site map of the Facility that is provided in Appendix A. In addition, an area used by Super Salvage for material storage but, according to Mr. Bullock, owned by the District of Columbia is also identified on the map. The entire property has been used as a scrap yard since the early 1990s based on historical Google Earth® imagery. There are typically between 12 and 15 employees on site daily. Generally scrap metal is dropped off to the site from vehicles entering at Entrance 2 and leaving at Entrance 1. Employees and walk up customers enter at Entrance 1. The scrap metal collected is stored on site until it can be sorted either with the magnet crane or by hand for recycling. Items observed during the inspection include aluminum, copper wire and copper piping, metal appliances, lead-acid batteries, engine parts, and scrap iron and steel. Scrap metal piles and what appeared to be used oil drums are stored outside and are not covered under a storm resistant shelter (see Photographs 15, 17, 41 and 70 in Appendix B). The only portions of the Facility under cover are the front office, a mechanical room containing hydraulic equipment, and portions of a conveyor belt system that transfers sorted metals to a crusher. Once the scrap metals have been sorted and compressed, they are sent off site to designated recycling centers.

According to Mr. Bullock, during rain events the Facility collects water and any other fluids that drain from the scrap piles in the small runoff collection pond via unlined earthen trenches (see Photographs 19, 29, and 30 in Appendix B). The small runoff collection pond is located near the center of the site and, according to Mr. Bullock, is the lowest point in the yard (see Photographs 13, 14 and 31 in Appendix B). The small runoff collection pond is visually monitored by workers and as the liquid level rises, a pump (see Photograph 31 in Appendix B) is manually started to pump the small runoff collection pond into the large runoff collection pond located along the southwest corner of the site (see the site map in Appendix A and Photograph 12 in Appendix B). According to Mr. Bullock, the small runoff collection pond is checked by workers in the morning following a rain event. In addition, according to Mr. Bullock, the large collection pond has never overflowed or reached the height of the riser (see Photographs 6 and 11 in Appendix B) and so has not been pumped out or cleaned in the 15 years he has worked there.

According to Mr. Bullock, there are no stormwater outfalls at the Facility and the site is designed so that stormwater does not leave the site. The perimeter of the site has a concrete curb, Entrance 1 has a berm, and Entrance 2 slopes into the Facility (see Photographs 2, 50, and 53 in Appendix B). However, in many cases, the EPA inspection team observed materials stored outside the perimeter of the Facility (see Photographs 58, 63, and 75 through 78 in Appendix B), sediment/material/liquid residue in and around the entrance and outside of the site (see Photographs 1,3, 47, 50, 56, 61, 73, 75, 80, 83 and 84 in Appendix B), and there was evidence of what appeared to be oil staining and fluid losses beyond the curbing and berm and sediment into the storm drain near the corner of First Street SW and S Street SW (see Photographs 75, 79, 80, 81, 83, and 84 in Appendix B).

NOI/Permit Requirements and Observations

The following observations were made relative to the requirements of the NOI for Storm Water Discharges Associated with Industrial Activity under the NPDES Multi-Sector General Permit and the 2008 USEPA Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP). During the inspection, the EPA inspection team walked the entrance, exit, the scrap metal piles, two ponds, a hydraulics machinery building, and an adjacent materials storage area used by Super Salvage but, according to Mr. Bullock, is owned by the District of Columbia.

MSGP Section 1.3.1 (Deadlines for Submitting Your NOI and Your Official Date of Permit Coverage) – The MSGP, which became effective on September 29, 2008, and regulates stormwater discharges from industrial facilities in 29 different industrial sectors, requires industrial facilities to implement and maintain site-specific stormwater control measures and to develop SWPPPs. New industrial facilities which began operating after January 5, 2009, must submit an NOI a minimum of 60 days prior to commencing discharge, or a minimum of 30 days if the SWPPP is posted on the Internet during this period and the Internet address (i.e., URL) to the SWPPP is provided on the NOI form.

Observation 1: Based on the industrial activities at the site, Super Salvage is an industrial scrap recycling facility categorized under Subsector N1 (Scrap Recycling and Waste Recycling Facilities except Source-Separated Recycling) according to Appendix D of the MSGP. At the time of the inspection, Super Salvage had not submitted an NOI for coverage under the MSGP. According to Mr. Bullock the Facility began operations in the 1990s under new ownership. Mr. Bullock stated that the grading of the Facility and perimeter berm were designed to contain all fluids, including stormwater, inside the Facility. In addition, Mr. Bullock stated that the Facility captures all stormwater and is held in the large runoff collection pond until it evaporates. Mr. Bullock stated that because the Facility does not discharge stormwater, he believes they do not need a permit.

When asked if self-inspections or other inspections had been conducted at the Facility, Mr. Bullock indicated that no inspections have been conducted during his time of employment that he recalls. After the inspection, the DDOE provided EPA with an Illicit Discharge Investigation Report for Super Salvage dated March 30, 2010 (see Appendix D).

MSGP Section 2.1.2.1 (Minimize Exposure) – Section 2.1.2.1 of the MSGP requires the facility to

minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings (although significant enlargement of impervious surface area is not recommended). In minimizing exposure, the facility should pay particular attention to the following:

- Use grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away from these areas;
- Locate materials, equipment, and activities so that leaks are contained in existing containment and diversion systems (confine the storage of leaky or leak-prone vehicles and equipment awaiting maintenance to protected areas);
- Clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants;
- Use drip pans and absorbents under or around leaky vehicles and equipment or store indoors where feasible;
- Use spill/overflow protection equipment;
- Drain fluids from equipment and vehicles prior to on-site storage or disposal;
- Perform all cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray; and
- Ensure that all washwater drains to a proper collection system (i.e., not the stormwater drainage system).

Observation 2: The EPA inspection team observed a number of spills and no active cleanup of those spills. The EPA inspection team observed what appeared to be oil and/or chemical layer floating on the surface of the large runoff collection pond. A saturated absorbent sock was observed adjacent to the pond (see Photographs 38-40 in Appendix B); however, the facility did not have active mitigation measures in place to remove the layer floating on top of the large collection pond. The EPA inspection team also observed vehicle air conditioning units placed on the ground and leaking fluids; however, no absorbent materials were placed on the leaking fluids (see Photographs 48-50 in Appendix B). The EPA inspection team observed what appeared to be oil staining outside of the perimeter berm (see Photographs 75 and 78 in Appendix B), sediment residue and liquids on District of Columbia (DC) streets outside/near entrance 2 (see Photographs 61 and 62 in Appendix B) and drainage from Super Salvage's open-top dumpsters located on, according to Mr. Bullock, DC property adjacent to the facility fence line (see Photographs 63 and 64 in Appendix B).

MSGP Section 2.1.2.3 (Maintenance) – Section 2.1.2.3 requires a facility regularly inspect, test, maintain, and repair all industrial equipment and systems to avoid situations that may result in leaks, spills, and other releases of pollutants in stormwater discharged to receiving waters. The permittee must maintain all control measures that are used to achieve the effluent limits required by the permit in effective operating condition. Nonstructural control measures must also be diligently maintained (e.g., spill response supplies available, personnel appropriately trained). If the permittee finds that its control measures need to be replaced or repaired, the permittee must make the necessary repairs or

modifications as expeditiously as practicable.

Observation 3: The EPA inspection team observed large amounts of staining and pooled fluids on the floor of the building from hydraulic equipment and 55-gallon drums (see Photographs 20 through 23 in Appendix B). The EPA inspection team observed saturated absorbent material that had been placed on some of the fluids. In addition, the door to the building led to small earthen trenches that conveyed liquids into the small runoff collection pond near the center of the facility (see Photograph 19 in Appendix B). According to Mr. Bullock, the small runoff collection pond is then pumped to the larger runoff collection pond.

MSGP Section 2.1.2.4 (Spill Prevention and Response Procedures) – Section 2.1.2.4 of the MSGP requires a facility to minimize the potential for leaks, spills, and other releases that may be exposed to stormwater and develop plans for effective response to such spills if or when they occur. At a minimum, the facility must implement:

- Procedures for plainly labeling containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides," etc.) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur;
- Preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling; and
- Procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases.

Observation 4: Super Salvage stored what appeared to be its used waste oil in an unlabeled plastic bin near Entrance 1 (see Photographs 71 and 72 in Appendix B). Several unlabeled open buckets and drums that were labeled as lubricants were also stored by the entrance on wooden pallets. It was unclear to the EPA inspection team whether the contents inside of these drums were lubricants (see Photographs 3, 4, and 70).

Observation 5: The EPA inspection team observed storage of what appeared to be lubricants and used oil filters in metal drums in various locations on site (See Photographs 3, 4, 15, 17, and 70 in Appendix B). Scrap engine parts were stored in cardboard boxes (see Photographs 65 and 66 in Appendix B). A 500-gallon diesel fuel tank was stored near Entrance 2. The diesel fuel tank was located in a high-traffic area with no barricades and was immediately adjacent to several oxygen tanks and propane tanks (see Photograph 53, 54, and 57 in Appendix B). When asked, Mr. Bullock was unsure if the oxygen and propane tanks were full or empty. The EPA inspection team did not observe secondary containment measures in place around the diesel fuel tank and small propane tanks. The EPA inspection team also observed additional fuel storage tanks including a 500-gallon diesel storage tank and numerous 55-gallon drums, without secondary containment, of what appeared to contain oils (see Photographs 34 and 44).

The EPA inspection team observed storage of sorted metal, engine parts, car batteries, leaking air conditioning units, and hydraulic equipment in various uncovered areas throughout the facility as well as on the property, that according to Mr. Bullock, is owned by DC (see Photographs 16, 24-28, 32-38, 41-45, 48-50, 63, and 64 in Appendix B).

Observation 6: The EPA inspection team observed what appeared to be oil staining and pools of oil present throughout the facility (see Photographs 67 and 68 in Appendix B). In some cases saturated absorbent material was present on top of the fluid (see Photograph 70 in Appendix B). The EPA inspection team observed leaking air conditioning equipment adjacent to the property fence line (see Photographs 48, 49, and 50 in Appendix B). As stated in observation 3, the EPA inspection team observed the inside of a small building containing hydraulic equipment. The floors had saturated absorbent material located near the drums and hydraulic equipment, in addition to pooled fluids underneath the hydraulic machinery (see Photographs 20-23 in Appendix B).

Based on a visual inventory of the large petroleum storage tanks and the 55-gallon drums, the EPA inspection team estimates the facility has in excess of 1,320 gallons of above-ground oil storage capacity. When asked about a Spill Prevention, Control, and Countermeasure (SPCC) plan for the facility, Mr. Bullock stated the facility has neither developed nor implemented an SPCC plan.

MSGP Section 2.1.2.9 (Employee Training) – Section 2.1.2.9 of the MSGP states the permittee must train all employees who work in areas where industrial materials or activities are exposed to stormwater, or who are responsible for implementing activities necessary to meet the conditions of this permit (e.g., inspectors, maintenance personnel), including all members of the Pollution Prevention Team. Training must cover both the specific control measures used to achieve the effluent limits, and monitoring, inspection, planning, reporting, and documentation requirements in other parts of this permit. EPA recommends training be conducted at least annually (or more often if employee turnover is high).

Observation 7: Mr. Bullock did not provide any evidence that stormwater-related training had been provided to employees that work in areas where industrial materials are exposed to stormwater.

MSGP Section 2.1.2.12 (Dust Generation and Vehicle Tracking of Industrial Materials) – Section 2.1.2.12 of the MSGP requires a permittee to minimize the generation of dust and off-site tracking of raw, final, or waste materials.

Observation 8: A Google Earth® map dated October 2012 shows sediment residue at both Entrance 1 and Entrance 2 of the site (see Site Map in Appendix A). During EPA's inspection of Super Salvage and the surrounding roadways, the EPA inspection team observed sediment residue on DC streets near both entrances and sediment entering a storm drain from the street (see Photograph 1, 53, 56, 58-64, and 79-81 in Appendix B).

MSGP Section 4.1 (Routine Facility Inspections) – The industrial facility seeking coverage under the MSGP must conduct routine facility inspections of all areas of the facility where industrial materials or activities are exposed to stormwater, and of all stormwater control measures used to comply with the effluent limits contained in the permit. Routine facility inspections must be conducted at least quarterly (i.e., once each calendar quarter), although in many instances, more frequent inspections (e.g., monthly) may be appropriate for some types of equipment, processes, and control measures or areas of the facility with significant activities and materials exposed to stormwater. The inspections must be performed during periods when the facility is in operation. The inspection schedules must be included in the SWPPP. These routine inspections must be performed by qualified personnel with at least one member of the facility's stormwater pollution prevention team participating. At least once each calendar year, the routine facility inspection must be conducted during a period when a stormwater discharge is occurring. Section 4.1.2 of the MSGP states the permittee must document the findings of each routine facility inspection performed and maintain this documentation on site with the SWPPP. At a minimum, the documentation of each routine facility inspection must include:

- The inspection date and time;
- The name(s) and signature(s) of the inspector(s);
- Weather information and a description of any discharges occurring at the time of the inspection;
- Any previously unidentified discharges of pollutants from the site;
- Any control measures needing maintenance or repairs;
- Any failed control measures that need replacement;
- Any incidents of noncompliance observed; and
- Any additional control measures needed to comply with the permit requirements.

Observation 9: Mr. Bullock indicated that no stormwater inspections were formally conducted at the site since his employment; therefore, inspection paperwork was not available at the time of the inspection. He stated that after storm events employees visually check the small collection pond in the morning and run the manual pump to the large pond as needed.

MSGP Section 4.2.1 (Quarterly Visual Assessment) – Once each quarter for the entire permit term, the facility must collect a stormwater sample from each outfall (except as noted in Part 4.2.3) and conduct a visual assessment of each of these samples. These samples are not required to be collected consistent with 40 CFR Part 136 procedures but should be collected in such a manner that the samples are representative of the stormwater discharge. The visual assessment must be made on a sample in a clean, clear glass, or plastic container and examined in a well-lit area and the sample must be collected within the first 30 minutes of an actual discharge from a storm event. If it is not possible to collect the sample within the first 30 minutes of discharge, the sample must be collected as soon as practicable after the first 30 minutes. The samples must be visually inspected for the following water quality characteristics: color; odor; clarity; floating solids; settled solids; suspended solids; foam; oil sheen; and other obvious indicators of stormwater pollution. Section 4.2.2 of the MSGP states the results of the quarterly visual assessment must be documented and the results of the visual assessment documentation muse remain on site with the SWPPP.

Observation 10: According to Mr. Bullock quarterly visual assessments of stormwater pollution have not been conducted or documented. Mr. Bullock stated the Facility did not

have a stormwater outfall due to the berms that had been placed around the perimeter to contain runoff. However, Mr. Bullock was unsure where the overflow (riser structure) to the large runoff collection pond discharged if levels reached the overflow (see Photographs 6 and 11).

MSGP Section 5.1 (Stormwater Pollution Prevention Plan) – The permittee must prepare a SWPPP for the industrial facility before submitting its Notice of Intent (NOI) for permit coverage. If a SWPPP was prepared for coverage under a previous NPDES permit, the permittee must review and update the SWPPP to implement all provisions of this permit prior to submitting its NOI. Section 5.1 of the MSGP requires the SWPPP to contain the following elements:

- Stormwater pollution prevention team;
- Site description;
- Summary of potential pollutant sources;
- Description of control measures;
- Schedules and procedures;
- Documentation to support eligibility considerations under other federal laws; and
- Signature requirements.

Section 5.2 of the MSGP requires the permittee to modify the SWPPP whenever necessary to address any of the triggering conditions for corrective action in Part 3.1. Section 3.1 includes requirements for the selection, design, installation, and implementation of control measures if construction or a change in design, operation, or maintenance at the facility significantly changes the nature of pollutants discharged in stormwater from the facility, or significantly increases the quantity of pollutants discharged.

Observation 11: According to Mr. Bullock, the Facility has not developed a Storm Water Pollution Prevention Plan (SWPPP) or an SPCC plan.