AI ID: 23178  Inspector: Brian Connoley

Site Name: Eastside Auto Recycling, Inc.
Facility Address: 4725 Erdman Ave, Baltimore, MD 21205
County: Baltimore City

Inspection Date: February 24, 2015  Start Date/Time: February 24, 2015, 09:00 AM
End Date/Time: February 24, 2015, 12:00 PM

Media Type(s): NPDES Industrial Stormwater

Contact(s): Mr. Kelvin Yearwood - Manager

**NPDES Industrial Stormwater**
Permit / Approval Numbers: 02SW1149

Site Status: Active

Site Condition: Noncompliance

Recommended Action: Additional Investigation Required

Inspection Reason: Routine Scheduled, Initial Quarterly, Initial Yearly

Evidence Collected: Visual Observation

**Inspection Findings:**

A routine inspection was conducted at the above facility, in regards to the general permit for discharges from stormwater associated with industrial activities on this date during cold, dry weather conditions. The facility is a full service dismantling facility for the recovery of used auto parts from vehicles. The 3.0 acre site includes one main building which includes a front parts counter, part storage, automotive garage and offices. Approximately 500 used automobiles are stored on-site at any one time. Stormwater travels as sheet flow over a mix of 40% impervious surface with a 60% mix of crushed stone over thick loam soil, generally southward to two outfalls before entering a small creek at the southern end of the property.

This inspector met with Mr. Kelvin Yearwood (Manager) and an explanation of this visit was made clear to Mr. Yearwood. The investigation consisted of a records review of the stormwater pollution prevention plan (SWPPP) and a site inspection; Mr. Yearwood did not accompany this inspector. Post inspection it was determined that violations were present.

With respect to the above MDE authorization, the following violation(s) of Environment Article Titles 9 and the above referenced NPDES permit, by USALCO, LLC, were observed on this date:

1. There are no records of employee training being conducted per permit requirements.
2. There are no records of routine/quarterly inspections being conducted per permit requirements.
3. There are no records of annual comprehensive inspections being conducted per permit requirements.
To bring this site into compliance with Environment Article Titles 9 the following corrections should be made immediately upon receipt of this report:

a. Immediately conduct and document employee training and annually thereafter in accordance with permit requirements.
b. Immediately conduct and document a routine/quarterly inspection of the facility and quarterly thereafter in accordance with permit requirements.
c. Immediately conduct and document an annual comprehensive inspection of the facility and annually thereafter in accordance with permit requirements.

STATE LAW PROVIDES FOR PENALTIES FOR VIOLATIONS OF MARYLAND ENVIRONMENT ARTICLE TITLES 9 FOR EACH DAY THE VIOLATION CONTINUES. THE MARYLAND DEPARTMENT OF THE ENVIRONMENT MAY SEEK PENALTIES FOR THE AFOREMENTIONED VIOLATIONS OF TITLES 9 ON THIS SITE FOR EACH DAY THE VIOLATION CONTINUES.

A follow up inspection will be conducted. Please address any questions or comments to the attention of Brian Connoley at 410-537-3526 or at brian.connoley@maryland.gov. A copy of this report has been forwarded to Mr. Yearwood.

NPDES Industrial Stormwater- Inspection Checklist

<table>
<thead>
<tr>
<th>Inspection Item</th>
<th>Status</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Does the facility have a discharge permit? [Environment Article §9-323a(1-3)]</td>
<td>No Violations Observed</td>
<td></td>
</tr>
<tr>
<td>2. Is the discharge permit current? Has facility applied for renewal? [Environment Article §9-328a(1)]</td>
<td>No Violations Observed</td>
<td></td>
</tr>
<tr>
<td>3. Is the facility as described in the current permit? Are treatment processes as described in the current permit? [COMAR 26.08.04.01.01B(4)]</td>
<td>No Violations Observed</td>
<td></td>
</tr>
<tr>
<td>4. Has notification been submitted about any new, different or increased discharges? [40 CFR Part 122 Subpart C Section 122.42.b(1-3)]</td>
<td>No Violations Observed</td>
<td></td>
</tr>
<tr>
<td>5. Is the number and location of discharge points as described in the discharge permit? [Environment Article §9-3314]</td>
<td>No Violations Observed</td>
<td></td>
</tr>
<tr>
<td>6. Has permittee submitted correct name and address of receiving waters? [40 CFR 122.21.i(3)]</td>
<td>No Violations Observed</td>
<td></td>
</tr>
<tr>
<td>7. Is the permittee meeting the compliance schedule per permit requirements? [COMAR 26.08.04.02-1.02-1A(3)]</td>
<td>Out of Compliance See findings</td>
<td></td>
</tr>
<tr>
<td>8. Has the operator or superintendent been certified by the Board in the appropriate classification for the facility? [COMAR 26.06.01.05A(1)]</td>
<td>Not Applicable</td>
<td></td>
</tr>
<tr>
<td>9. Are adequate records being maintained for the sampling date, time, and exact location; analysis dates and times; individual performing analysis; and analytical results? [COMAR 26.08.04.03.03B(3)(a, b, c, e)]</td>
<td>Not Applicable</td>
<td></td>
</tr>
</tbody>
</table>
## NPDES Industrial Stormwater- Inspection Checklist

<table>
<thead>
<tr>
<th>Inspection Item</th>
<th>Status</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>10. Are adequate records being maintained for the analytical methods/techniques used? [COMAR 26.08.04.03B(3)(d)]</td>
<td>Not Applicable</td>
<td></td>
</tr>
<tr>
<td>11. Does the permittee retained a minimum of 3 years worth of monitoring records including raw data and original strip chart recordings; calibration and maintenance records; and reports? [COMAR 26.08.04.03B(1)]</td>
<td>Not Applicable</td>
<td></td>
</tr>
<tr>
<td>12. Is the lab and monitoring equipment being properly calibrated and maintained? Are they keeping records to reflect this? [Environment Article §9-3313]</td>
<td>Not Applicable</td>
<td></td>
</tr>
<tr>
<td>13. Is laboratory controls and appropriate quality assurance procedures properly operated and maintained? [40 CFR Part 122 Subpart C Section 122.41.e]</td>
<td>Not Applicable</td>
<td></td>
</tr>
<tr>
<td>14. Has the permittee submitted the monitoring results on the proper Discharge Monitoring Report form? [COMAR 26.08.04.03C(1)]</td>
<td>Not Applicable</td>
<td></td>
</tr>
<tr>
<td>15. Has the permittee submitted these results within the allotted time? [COMAR 26.08.04.03C(2)]</td>
<td>Not Applicable</td>
<td></td>
</tr>
<tr>
<td>16. Are discharge monitoring reports complete and reflect permit conditions? [COMAR 26.08.04.03B(3)]</td>
<td>Not Applicable</td>
<td></td>
</tr>
<tr>
<td>17. Is the facility being properly operated and maintained including: (a) stand-by power or equivalent provisions available, (b) adequate alarm system for power or equipment failure available, (c) all treatments units are in service, . [40 CFR Part 122 Subpart C Section 122.41.e]</td>
<td>Not Applicable</td>
<td></td>
</tr>
<tr>
<td>18. Is sewage sludge managed correctly per permit requirements? [COMAR 26.04.06.03.03]</td>
<td>Not Applicable</td>
<td></td>
</tr>
<tr>
<td>19. Any by-pass since last inspection? Has permittee submitted notice of any by-pass? [40 CFR Part 122 Subpart C Section 122.41.m(4)(i)(C)]</td>
<td>Not Applicable</td>
<td></td>
</tr>
<tr>
<td>20. Any non-complying discharges experienced since last inspection? Has regulatory agency been notified? [40 CFR Part 122 Subpart C Section 122.41.l(6)]</td>
<td>Not Applicable</td>
<td></td>
</tr>
<tr>
<td>21. Have overflows occurred since the last inspection? [COMAR 26.08.10.02A]</td>
<td>Not Applicable</td>
<td></td>
</tr>
<tr>
<td>22. Has records of overflows been maintained at the facility for at least five years? [COMAR 26.08.10.06A-B]</td>
<td>Not Applicable</td>
<td></td>
</tr>
</tbody>
</table>
## NPDES Industrial Stormwater- Inspection Checklist

<table>
<thead>
<tr>
<th>Inspection Item</th>
<th>Status</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>23.  Are flow measuring devices properly installed and operated, calibration frequency of flow meter adequate, flow measurement equipment adequate to handle expected ranges of flow? [40 CFR Part 122 Subpart C Section 122.41.e]</td>
<td>Not Applicable</td>
<td></td>
</tr>
<tr>
<td>24.  Are discharge monitoring points adequate for representative sampling? Do parameters and sampling frequency meet the minimum requirements? Does the permittee use the method of sample collection required by the permit? [Environment Article §9-331(4)]</td>
<td>No Violations Observed</td>
<td></td>
</tr>
<tr>
<td>25.  Are analytical testing procedures approved by EPA? If alternate analytical procedures are used, proper approval has been obtained? [COMAR 26.08.01.02B(1)]</td>
<td>Not Applicable</td>
<td></td>
</tr>
<tr>
<td>26.  Has the permittee notified the Department of the name and address of the commercial laboratory? [COMAR 26.08.04.03.03A(3)]</td>
<td>Not Applicable</td>
<td></td>
</tr>
<tr>
<td>27.  Were discharges observed at the authorized outfalls? Does the facility have any unauthorized discharges to waters of the State? [Environment Article §9-322]</td>
<td>No Violations Observed</td>
<td></td>
</tr>
<tr>
<td>28.  Does the discharges or receiving waters have any visible pollutants (oil sheen, grease, turbidity, foam, floating solids, color), odor, noncompliant DO concentrations, and/or noncompliant temperature ranges? [Environment Article §9-314b(1)]</td>
<td>No Violations Observed</td>
<td></td>
</tr>
<tr>
<td>29.  Were discharge samples collected? [Environment Article §9-261c(1)]</td>
<td>Not Evaluated</td>
<td></td>
</tr>
<tr>
<td>30.  Is the facility required to have a storm water pollution prevention plan? Has storm water pollution prevention plan been developed and implemented as required? Does storm water pollution prevention plan require modifications to prevent runoff of pollutants? [40 CFR Part 122 Subpart B Section 122.26.c(1)(I)(A-B)]</td>
<td>Out of Compliance</td>
<td>See findings</td>
</tr>
<tr>
<td>31.  Are the permit conditions being met? [Environment Article §9-326a(1)]</td>
<td>Out of Compliance</td>
<td>See findings</td>
</tr>
</tbody>
</table>

Inspector: Brian Connoley/Date  
brian.connoley@maryland.gov  
410-537-3978  

Received by: ________________________________  
Signature/Date  
______________________________  
Print Name
AI ID: 23178

Inspector: Benjamin Wells

Site Name: Y & R Eastside Auto Recycling
Facility Address: 4725 Erdman Ave, Baltimore, MD 21205
County: Baltimore City

Inspection Date: June 16, 2017

Start Date/Time: June 16, 2017, 11:00 AM
End Date/Time: June 16, 2017, 03:00 PM

Media Type(s): NPDES Industrial Stormwater

Contact(s): Kelvin Yearwood – Owner/Manager

NPDES Industrial Stormwater
Permit/Approval Numbers: 12SW1149

Site Status: Active

Site Condition: Noncompliance

Recommended Action: Additional Investigation Required

Inspection Reason: Routine Scheduled, Initial Quarterly, Initial Yearly

Evidence Collected:
Photos/Videos Taken, Visual Observation

Inspection Findings:

Today, on June 16, 2017 an unannounced routine inspection was conducted at the above reference facility for compliance with the State/National Pollution Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Industrial Activity, Permit No. 12-SW. The weather today was partly cloudy. During today’s inspection I met with Kelvin Yearwood. Mr. Yearwood was present for a records review of the site’s Stormwater Pollution Prevention Plan (SWPPP). After a records review, Mr. Yearwood and I proceeded to take a site walkthrough around the facility.

Records Review

Mr. Yearwood was able to provide a copy of the site’s Stormwater Pollution Prevention Plan (SWPPP) upon request. The facility received coverage under the Permit No. 12-SW on 2/8/2016. The size of the property is listed at 2.00 acres. The facility operates as a full service dismantling facility of late model domestic & foreign vehicles & light trucks for the recovery and sale of used auto parts.

The SWPPP listed that the industrial activities that occur onsite include dismantling vehicles, vehicle check-in area, battery removal, diesel AST, waste oil AST and gasoline AST. The site map also noted that there was a parts washing area onsite. All of these areas were inspected during today’s site walkthrough. There are approximately 500 vehicles
stored at the facility. There are approximately 10 vehicles dismantled per week. The SWPPP noted that fluids are drained and batteries are removed before vehicles are put in the storage area.

As per the permit requirements, quarterly routine inspections of the facility should be conducted at least once a quarter after the permit has been issued. There were no quarterly routine inspections present at the facility.

As per the permit requirements, quarterly visual monitoring reports should be conducted at least once a quarter after the permit has been issue. There were no quarterly visual monitoring reports presented at the facility. Once a quarter during a rain event or a snow melt, the facility should get a stormwater sample at the listed discharge monitoring points on the site map and answering the corresponding questions on the quarterly visual monitoring form.

As per the permit requirements, annual comprehensive inspections should be conducted yearly after the permit has been issued. There were no annual comprehensive inspections present at the facility.

As per the permit requirements, yearly SWPPP training should be conducted at the facility. There was no documentation of annual SWPPP training present at the facility.

I went over the compliance schedule today with Mr. Yearwood.

Prior to the inspection, I observed that the facility was not signed up and reporting Discharge Monitoring Reports on the electronic reporting site NetDMR. It was evaluated today that the facility had not completed benchmark sampling for any of the required quarters by the permit.

Since the facility qualifies for the SW-12 permit under Sector M: Auto Salvage, they are required to complete benchmark monitoring of Total Suspended Solids (TSS), Aluminum, Iron and Lead. Samples should be analyzed consistent with 40 CFR Part 136 analytical methods and using test procedures with quantitation limits at or below benchmark values for all benchmark parameters for which you are required to sample.

To assist Maryland and other states in complying with this new requirement, the U.S. EPA has developed a tool called NetDMR that allows regulated permittees, such as your facility, to submit the required permit monitoring reports electronically via a secure internet application (i.e., a standard web browser such as Internet Explorer or Chrome). All monitoring data you collect to comply with your permit for a DMR that is due should be summarized and submitted electronically using NetDMR.

Before you can submit official DMRs using NetDMR you should attend training Webinars on-line or inhouse training at the Department. If you prefer to attend a training seminar, you should sign up for the Department’s limited seating monthly training sessions. If you do not attend the required training (seminar or webinar) in a timely manner, you are in risk of violating the new U.S. EPA NPDES electronic reporting rule. You should apply for access to NetDMR at www.epa.gov/netdmr. To obtain information regarding the Department’s NetDMR training or if you have questions regarding NetDMR submissions, please contact the Water Management Administration via email at mde.netdmr@maryland.gov or by phone at 410-537-3520 and the Department will address your concerns or questions. You may also visit our webpage at http://www.mde.state.md.us/programs/Water/Compliance/Pages/index.aspx to review our NetDMR brochure for upcoming training opportunities. Additional NetDMR support is available at https://netdmr.zendesk.com/home.

Site Walkthrough

During today’s site walkthrough, all areas of potential contamination were inspected to ensure compliance with the SWPPP and the Permit No.12-SW. Mr. Yearwood informed me that customers are not allowed in the vehicle storage area and the facility is responsible for removal of parts from vehicles. Almost all hoods on vehicles were closed. Vehicles that could not have hoods closed had all batteries removed to prevent stormwater exposure. There were no batteries exposed to stormwater onsite. Throughout the lot, there was various staining on the stone that was under the vehicles. The staining is from leaks/spills from the vehicles and has the potential to contaminate stormwater during a rain event. The facility should frequently monitor the lot and if any staining is noticed, the stained material should be removed and disposed of properly to prevent stormwater contamination. By the dismantling area, there was a vehicle
part that was exposed to stormwater and had staining around it from a leak (see photos). The facility should ensure that vehicle parts that have the potential to leak and/or have an oil/lubricated coating are kept out of exposure to stormwater. The facility had a scrap dumpster onsite, it was requested that this scrap dumpster be tarped to prevent exposure of old vehicle parts to stormwater.

Part washing was observed onsite during today’s site walkthrough. The washwater was not being contained and was flowing through the lot. The washwater was observed to have oil sheen (see photos) The Permit No. 12-SW states that “The discharge of vehicle and equipment washwater, including tank cleaning operations is not authorized by this permit. These wastewaters must be covered by a separate NPDES permit, discharged to a sanitary sewer in accordance with applicable industrial pretreatment requirements, or disposed of otherwise in accordance with applicable law.” I informed Mr. Yearwood that this washwater should be collected and disposed of properly or discharged to the sanitary sewer line. Mr. Yearwood informed me that the floor drains in the maintenance area are directed to the sanitary sewer line. If the facility decides to wash vehicle parts over the sanitary sewer line, they should receive authorization under a separate wastewater discharge permit through the City of Baltimore.

With respect to the above MDE authorization the following violations of Environment Article Title 9, by Y&R Eastside Auto Recycling were observed this date with corrections needed immediately:

1) There were no quarterly visual stormwater monitoring records available for review. The facility is not following the compliance schedule in accordance to Permit conditions. The facility should complete/document quarterly visual monitoring of stormwater at a designated outfall location indicated in the SWPPP in accordance to Permit conditions.

2) There were no quarterly routine facility inspections available for review. The facility is not following the compliance schedule in accordance to Permit conditions. The facility should follow the compliance schedule and complete/document routine facility inspections.

3) There were no annual comprehensive site evaluations available for review. The facility is not following the compliance schedule in accordance to Permit conditions. The facility should complete/document annual comprehensive site compliance evaluations in accordance to Permit conditions.

4) There were no annual employee SWPPP training records available for review. The facility is not following the compliance schedule in accordance to Permit conditions. The facility should complete/document annual employee SWPPP training in accordance to Permit conditions.

5) The facility has not properly completed and reported benchmark monitoring results through NetDMR in accordance to Permit requirements. The facility should complete and submit quarterly benchmark monitoring results properly through NetDMR per Permit conditions.

6) By the dismantling area, there was a vehicle part that was exposed to stormwater and had staining around it from a previous leak. The facility should ensure that vehicle parts that have the potential to leak and/or have an oil/lubricated coating are kept out of exposure to stormwater.

7) Part washing was observed onsite during today’s site walkthrough. The washwater was not being contained and was flowing through the lot. The washwater was observed to have oil sheen. Washwater should be collected and disposed of properly or discharged to the sanitary sewer line. If the facility decides to wash vehicle parts over the sanitary sewer line, they should receive authorization under a separate wastewater discharge permit through the City of Baltimore.

STATE LAW PROVIDES FOR PENALTIES FOR VIOLATIONS OF MARYLAND ENVIRONMENT ARTICLE TITLE 9 FOR EACH DAY THE VIOLATION CONTINUES. THE MARYLAND DEPARTMENT OF THE ENVIRONMENT MAY SEEK PENALTIES FOR THE AFOREMENTIONED VIOLATIONS OF TITLE 9 ON THIS SITE FOR EACH DAY THE VIOLATION CONTINUES.
For information regarding NetDMR submission and reporting, contact Bill Lee of the Department’s Compliance Program at wlee@maryland.gov or at 410-537-3514.

A follow-up inspection of this facility will be conducted.

Any questions regarding this report can be referred to Benjamin Wells at 410-537-3526 or at Benjamin.wells@maryland.gov.

A copy of this report was forwarded to Mr. Yearwood.

### NPDES Industrial Stormwater- Inspection Checklist

<table>
<thead>
<tr>
<th>Inspection Item</th>
<th>Status</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Does the facility have a discharge permit?</td>
<td>No Violations Observed</td>
<td></td>
</tr>
<tr>
<td>[Environment Article §9-323(a)(1-3)]</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. Has a Stormwater Pollution Prevention Plan (SWPPP) been implemented as required?</td>
<td>Out of Compliance</td>
<td>See findings.</td>
</tr>
<tr>
<td>[40 CFR Part 122 Subpart B Section 122.26.(c)(1)(i)(A-B)]</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. Is the number and location of discharge outfalls as described within the Stormwater Pollution Prevention Plan (SWPPP)? [40 CFR Part 122 Subpart B Section 122.26.(c)(1)(i)(A-B)]</td>
<td>No Violations Observed</td>
<td></td>
</tr>
<tr>
<td>5. Does the Stormwater Pollution Prevention Plan (SWPPP) require modifications to prevent runoff of pollutants? [40 CFR Part 122 Subpart C Section 122.42.(b)(1-3)]</td>
<td>No Violations Observed</td>
<td></td>
</tr>
<tr>
<td>6. Are adequate records being maintained for the quarterly routine facility inspections? [Environment Article §9-261(a)(2)]</td>
<td>Out of Compliance</td>
<td>See findings.</td>
</tr>
<tr>
<td>7. Are adequate records being maintained for the quarterly visual monitoring? [Environment Article §9-261(a)(2)]</td>
<td>Out of Compliance</td>
<td>See findings.</td>
</tr>
<tr>
<td>8. Are adequate records being maintained for the annual comprehensive evaluation? [Environment Article §9-261(a)(2)]</td>
<td>Out of Compliance</td>
<td>See findings.</td>
</tr>
<tr>
<td>9. Are adequate records being maintained for the employee training who are implementing activities necessary to meet the conditions of the permit? [Environment Article §9-261(a)(2)]</td>
<td>Out of Compliance</td>
<td>See findings.</td>
</tr>
<tr>
<td>10. If monitoring of benchmark parameters is required, has the permittee performed the required quarterly monitoring? [COMAR 26.08.04.03A(2)]</td>
<td>Out of Compliance</td>
<td>See findings.</td>
</tr>
</tbody>
</table>
NPDES Industrial Stormwater- Inspection Checklist

<table>
<thead>
<tr>
<th>Inspection Item</th>
<th>Status</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>11. If monitoring of benchmark parameters is required, has the permittee submitted quarterly benchmark monitoring results electronically within the allotted time? [COMAR 26.08.04.03C(2), 40 CFR Part 127.16]</td>
<td>Out of Compliance</td>
<td>See findings.</td>
</tr>
<tr>
<td>12. Were visible pollutants observed in the receiving waters or in a position likely to pollute water of the State? [Environment Article §9-322]</td>
<td>Out of Compliance</td>
<td>See findings.</td>
</tr>
<tr>
<td>13. If discharges were observed, were samples of the discharge taken? [Environment Article §9-261(c)(1)]</td>
<td>Not Evaluated</td>
<td></td>
</tr>
</tbody>
</table>

Inspector: Benjamin Wells/Date 6/16/2017
benjamin.wells@maryland.gov
410-537-3526

Received by: ________________________
Signature/Date ________________________
Print Name ________________________

Report Provided to: 
[ ] Fax ________________________
[ ] Email ________________________
[ ] Regular Mail ________________________
[ ] Certified Mail ________________________
Photo 1: Staining on ground from vehicle part leak by the maintenance area.

Photo 2: Evidence of part washing onsite by the maintenance area with visible pollutants.
NPDES Industrial Stormwater

Permit / Approval Numbers: 12SW1149

Site Status: Active

Site Condition: Noncompliance

Recommended Action: Additional Investigation Required

Inspection Reason: Routine Scheduled, Initial Quarterly, Initial Yearly

Evidence Collected:
Photos/Videos Taken, Visual Observation

Inspection Findings:

Today, on June 16, 2017 an unannounced routine inspection was conducted at the above reference facility for compliance with the State/National Pollution Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Industrial Activity, Permit No. 12-SW. The weather today was partly cloudy. During today’s inspection I met with Kelvin Yearwood. Mr. Yearwood was present for a records review of the site’s Stormwater Pollution Prevention Plan (SWPPP). After a records review, Mr. Yearwood and I proceeded to take a site walkthrough around the facility.

Records Review

Mr. Yearwood was able to provide a copy of the site’s Stormwater Pollution Prevention Plan (SWPPP) upon request. The facility received coverage under the Permit No. 12-SW on 2/8/2016. The size of the property is listed at 2.00 acres. The facility operates as a full service dismantling facility of late model domestic & foreign vehicles & light trucks for the recovery and sale of used auto parts.

The SWPPP listed that the industrial activities that occur onsite include dismantling vehicles, vehicle check-in area, battery removal, diesel AST, waste oil AST and gasoline AST. The site map also noted that there was a parts washing area onsite. All of these areas were inspected during today’s site walkthrough. There are approximately 500 vehicles
stored at the facility. There are approximately 10 vehicles dismantled per week. The SWPPP noted that fluids are 
drained and batteries are removed before vehicles are put in the storage area.

As per the permit requirements, quarterly routine inspections of the facility should be conducted at least once a quarter 
after the permit has been issued. There were no quarterly routine inspections present at the facility.

As per the permit requirements, quarterly visual monitoring reports should be conducted at least once a quarter after the 
permit has been issue. There were no quarterly visual monitoring reports presented at the facility. Once a quarter during 
a rain event or a snow melt, the facility should get a stormwater sample at the listed discharge monitoring points on the 
site map and answering the corresponding questions on the quarterly visual monitoring form.

As per the permit requirements, annual comprehensive inspections should be conducted yearly after the permit has 
been issued. There were no annual comprehensive inspections present at the facility.

As per the permit requirements, yearly SWPPP training should be conducted at the facility. There was no 
documentation of annual SWPPP training present at the facility.

I went over the compliance schedule today with Mr. Yearwood.

Prior to the inspection, I observed that the facility was not signed up and reporting Discharge Monitoring Reports on 
the electronic reporting site NetDMR. It was evaluated today that the facility had not completed benchmark sampling 
for any of the required quarters by the permit.

Since the facility qualifies for the SW-12 permit under Sector M: Auto Salvage, they are required to complete 
benchmark monitoring of Total Suspended Solids (TSS), Aluminum, Iron and Lead. Samples should be analyzed 
consistent with 40 CFR Part 136 analytical methods and using test procedures with quantitation limits at or below 
benchmark values for all benchmark parameters for which you are required to sample.

To assist Maryland and other states in complying with this new requirement, the U.S. EPA has developed a tool called 
NetDMR that allows regulated permittees, such as your facility, to submit the required permit monitoring reports 
electronically via a secure internet application (i.e., a standard web browser such as Internet Explorer or Chrome). All 
monitoring data you collect to comply with your permit for a DMR that is due should be summarized and submitted 
electronically using NetDMR.

Before you can submit official DMRs using NetDMR you should attend training Webinars on-line or inhouse training 
at the Department. If you prefer to attend a training seminar, you should sign up for the Department’s limited seating 
monthly training sessions. If you do not attend the required training (seminar or webinar) in a timely manner, you are in 
risk of violating the new U.S. EPA NPDES electronic reporting rule. You should apply for access to NetDMR at 
www.epa.gov/netdmr. To obtain information regarding the Department’s NetDMR training or if you have questions 
regarding NetDMR submissions, please contact the Water Management Administration via email at 
mde.netdmr@maryland.gov or by phone at 410-537-3520 and the Department will address your concerns or questions. 
You may also visit our webpage at http://www.mde.state.md.us/programs/Water/Compliance/Pages/index.aspx to 
review our NetDMR brochure for upcoming training opportunities. Additional NetDMR support is available at 

Site Walkthrough

During today’s site walkthrough, all areas of potential contamination were inspected to ensure compliance with the 
SWPPP and the Permit No.12-SW. Mr. Yearwood informed me that customers are not allowed in the vehicle storage 
area and the facility is responsible for removal of parts from vehicles. Almost all hoods on vehicles were closed. 
Vehicles that could not have hoods closed had all batteries removed to prevent stormwater exposure. There were no 
batteries exposed to stormwater onsite. Throughout the lot, there was various staining on the stone that was under the 
vehicles. The staining is from leaks/spills from the vehicles and has the potential to contaminate stormwater during a 
rain event. The facility should frequently monitor the lot and if any staining is noticed, the stained material should be 
removed and disposed of properly to prevent stormwater contamination. By the dismantling area, there was a vehicle
part that was exposed to stormwater and had staining around it from a leak (see photos). The facility should ensure that vehicle parts that have the potential to leak and/or have an oil/lubricated coating are kept out of exposure to stormwater. The facility had a scrap dumpster onsite, it was requested that this scrap dumpster be tarped to prevent exposure of old vehicle parts to stormwater.

Part washing was observed onsite during today’s site walkthrough. The washwater was not being contained and was flowing through the lot. The washwater was observed to have oil sheen (see photos) The Permit No. 12-SW states that “The discharge of vehicle and equipment washwater, including tank cleaning operations is not authorized by this permit. These wastewaters must be covered by a separate NPDES permit, discharged to a sanitary sewer in accordance with applicable industrial pretreatment requirements, or disposed of otherwise in accordance with applicable law.” I informed Mr. Yearwood that this washwater should be collected and disposed of properly or discharged to the sanitary sewer line. Mr. Yearwood informed me that the floor drains in the maintenance area are directed to the sanitary sewer line. If the facility decides to wash vehicle parts over the sanitary sewer line, they should receive authorization under a separate wastewater discharge permit through the City of Baltimore.

With respect to the above MDE authorization the following violations of Environment Article Title 9, by Y&R Eastside Auto Recycling were observed this date with corrections needed immediately:

1) There were no quarterly visual stormwater monitoring records available for review. The facility is not following the compliance schedule in accordance to Permit conditions. The facility should complete/document quarterly visual monitoring of stormwater at a designated outfall location indicated in the SWPPP in accordance to Permit conditions.

2) There were no quarterly routine facility inspections available for review. The facility is not following the compliance schedule in accordance to Permit conditions. The facility should follow the compliance schedule and complete/document routine facility inspections.

3) There were no annual comprehensive site evaluations available for review. The facility is not following the compliance schedule in accordance to Permit conditions. The facility should complete/document annual comprehensive site compliance evaluations in accordance to Permit conditions.

4) There were no annual employee SWPPP training records available for review. The facility is not following the compliance schedule in accordance to Permit conditions. The facility should complete/document annual employee SWPPP training in accordance to Permit conditions.

5) The facility has not properly completed and reported benchmark monitoring results through NetDMR in accordance to Permit requirements. The facility should complete and submit quarterly benchmark monitoring results properly through NetDMR per Permit conditions.

6) By the dismantling area, there was a vehicle part that was exposed to stormwater and had staining around it from a previous leak. The facility should ensure that vehicle parts that have the potential to leak and/or have an oil/lubricated coating are kept out of exposure to stormwater.

7) Part washing was observed onsite during today’s site walkthrough. The washwater was not being contained and was flowing through the lot. The washwater was observed to have oil sheen. Washwater should be collected and disposed of properly or discharged to the sanitary sewer line. If the facility decides to wash vehicle parts over the sanitary sewer line, they should receive authorization under a separate wastewater discharge permit through the City of Baltimore.

STATE LAW PROVIDES FOR PENALTIES FOR VIOLATIONS OF MARYLAND ENVIRONMENT ARTICLE TITLE 9 FOR EACH DAY THE VIOLATION CONTINUES. THE MARYLAND DEPARTMENT OF THE ENVIRONMENT MAY SEEK PENALTIES FOR THE AFOREMENTIONED VIOLATIONS OF TITLE 9 ON THIS SITE FOR EACH DAY THE VIOLATION CONTINUES.
For information regarding NetDMR submission and reporting, contact Bill Lee of the Department's Compliance Program at wlee@maryland.gov or at 410-537-3514.

A follow-up inspection of this facility will be conducted.

Any questions regarding this report can be referred to Benjamin Wells at 410-537-3526 or at Benjamin.wells@maryland.gov.

A copy of this report was forwarded to Mr. Yearwood.

### NPDES Industrial Stormwater- Inspection Checklist

<table>
<thead>
<tr>
<th>Inspection Item</th>
<th>Status</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Does the facility have a discharge permit? [Environment Article §9-323(a)(1-3)]</td>
<td>No Violations Observed</td>
<td></td>
</tr>
<tr>
<td>2. Has a Stormwater Pollution Prevention Plan (SWPPP) been implemented as required? [40 CFR Part 122 Subpart B Section 122.26.(c)(1)(i)(A-B)]</td>
<td>Out of Compliance</td>
<td>See findings.</td>
</tr>
<tr>
<td>3. Is the number and location of discharge outfalls as described within the Stormwater Pollution Prevention Plan (SWPPP)? [40 CFR Part 122 Subpart B Section 122.26.(c)(1)(i)(A-B)]</td>
<td>No Violations Observed</td>
<td></td>
</tr>
<tr>
<td>5. Does the Stormwater Pollution Prevention Plan (SWPPP) require modifications to prevent runoff of pollutants? [40 CFR Part 122 Subpart C Section 122.42.(b)(1-3)]</td>
<td>No Violations Observed</td>
<td></td>
</tr>
<tr>
<td>6. Are adequate records being maintained for the quarterly routine facility inspections? [Environment Article §9-261(a)(2)]</td>
<td>Out of Compliance</td>
<td>See findings.</td>
</tr>
<tr>
<td>7. Are adequate records being maintained for the quarterly visual monitoring? [Environment Article §9-261(a)(2)]</td>
<td>Out of Compliance</td>
<td>See findings.</td>
</tr>
<tr>
<td>8. Are adequate records being maintained for the annual comprehensive evaluation? [Environment Article §9-261(a)(2)]</td>
<td>Out of Compliance</td>
<td>See findings.</td>
</tr>
<tr>
<td>9. Are adequate records being maintained for the employee training who are implementing activities necessary to meet the conditions of the permit? [Environment Article §9-261(a)(2)]</td>
<td>Out of Compliance</td>
<td>See findings.</td>
</tr>
<tr>
<td>10. If monitoring of benchmark parameters is required, has the permittee performed the required quarterly monitoring? [COMAR 26.08.04.03A(2)]</td>
<td>Out of Compliance</td>
<td>See findings.</td>
</tr>
</tbody>
</table>
**NPDES Industrial Stormwater- Inspection Checklist**

<table>
<thead>
<tr>
<th>Inspection Item</th>
<th>Status</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>11. If monitoring of benchmark parameters is required, has the permittee submitted quarterly benchmark monitoring results electronically within the allotted time? [COMAR 26.08.04.03C(2), 40 CFR Part 127.16]</td>
<td>Out of Compliance</td>
<td>See findings.</td>
</tr>
<tr>
<td>12. Were visible pollutants observed in the receiving waters or in a position likely to pollute water of the State? [Environment Article §9-322]</td>
<td>Out of Compliance</td>
<td>See findings.</td>
</tr>
<tr>
<td>13. If discharges were observed, were samples of the discharge taken? [Environment Article §9-261(c)(1)]</td>
<td>Not Evaluated</td>
<td></td>
</tr>
</tbody>
</table>

**Inspector:**

Benjamin Wells/Date
benjamin.wells@maryland.gov
410-537-3526

**Received by:** ________________________________

---

**Report Provided to:**

- [ ] Fax
- [ ] Email
- [ ] Regular Mail
- [ ] Certified Mail
Maryland Department of Environment
Water Management Administration
Compliance Program
1800 Washington Blvd, Baltimore, MD 21230
410-537-3510

AI ID: 23178
Inspector: Benjamin Wells

Site Name: Y & R Eastside Auto Recycling
Facility Address: 4725 Erdman Ave, Baltimore, MD 21205
County: Baltimore City

Inspection Date: June 16, 2017
Start Date/Time: June 16, 2017, 11:00 AM
End Date/Time: June 16, 2017, 03:00 PM

Media Type(s): NPDES Industrial Stormwater

Contact(s): Kelvin Yearwood – Owner/Manager

NPDES Industrial Stormwater
Permit/Approval Numbers: 12SW1149

Site Status: Active

Site Condition: Noncompliance

Recommended Action: Additional Investigation Required

Inspection Reason: Routine Scheduled, Initial Quarterly, Initial Yearly

Evidence Collected:
Photos/Videos Taken, Visual Observation

Inspection Findings:

Today, on June 16, 2017 an unannounced routine inspection was conducted at the above reference facility for compliance with the State/National Pollution Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Industrial Activity, Permit No. 12-SW. The weather today was partly cloudy. During today’s inspection I met with Kelvin Yearwood. Mr. Yearwood was present for a records review of the site’s Stormwater Pollution Prevention Plan (SWPPP). After a records review, Mr. Yearwood and I proceeded to take a site walkthrough around the facility.

Records Review

Mr. Yearwood was able to provide a copy of the site’s Stormwater Pollution Prevention Plan (SWPPP) upon request. The facility received coverage under the Permit No. 12-SW on 2/8/2016. The size of the property is listed at 2.00 acres. The facility operates as a full service dismantling facility of late model domestic & foreign vehicles & light trucks for the recovery and sale of used auto parts.
The SWPPP listed that the industrial activities that occur onsite include dismantling vehicles, vehicle check-in area, battery removal, diesel AST, waste oil AST and gasoline AST. The site map also noted that there was a parts washing area onsite. All of these areas were inspected during today’s site walkthrough. There are approximately 500 vehicles stored at the facility. There are approximately 10 vehicles dismantled per week. The SWPPP noted that fluids are drained and batteries are removed before vehicles are put in the storage area.

As per the permit requirements, quarterly routine inspections of the facility should be conducted at least once a quarter after the permit has been issued. There were no quarterly routine inspections present at the facility.

As per the permit requirements, quarterly visual monitoring reports should be conducted at least once a quarter after the permit has been issue. There were no quarterly visual monitoring reports presented at the facility. Once a quarter during a rain event or a snow melt, the facility should get a stormwater sample at the listed discharge monitoring points on the site map and answering the corresponding questions on the quarterly visual monitoring form.

As per the permit requirements, annual comprehensive inspections should be conducted yearly after the permit has been issued. There were no annual comprehensive inspections present at the facility.

As per the permit requirements, yearly SWPPP training should be conducted at the facility. There was no documentation of annual SWPPP training present at the facility.

I went over the compliance schedule today with Mr. Yearwood.

Prior to the inspection, I observed that the facility was not signed up and reporting Discharge Monitoring Reports on the electronic reporting site NetDMR. It was evaluated today that the facility had not completed benchmark sampling for any of the required quarters by the permit.

Since the facility qualifies for the SW-12 permit under Sector M: Auto Salvage, they are required to complete benchmark monitoring of Total Suspended Solids (TSS), Aluminum, Iron and Lead. Samples should be analyzed consistent with 40 CFR Part 136 analytical methods and using test procedures with quantitation limits at or below benchmark values for all benchmark parameters for which you are required to sample.

To assist Maryland and other states in complying with this new requirement, the U.S. EPA has developed a tool called NetDMR that allows regulated permittees, such as your facility, to submit the required permit monitoring reports electronically via a secure internet application (i.e., a standard web browser such as Internet Explorer or Chrome). All monitoring data you collect to comply with your permit for a DMR that is due should be summarized and submitted electronically using NetDMR.

Before you can submit official DMRs using NetDMR you should attend training Webinars on-line or inhouse training at the Department. If you prefer to attend a training seminar, you should sign up for the Department’s limited seating monthly training sessions. If you do not attend the required training (seminar or webinar) in a timely manner, you are in risk of violating the new U.S. EPA NPDES electronic reporting rule. You should apply for access to NetDMR at www.epa.gov/netdmr. To obtain information regarding the Department’s NetDMR training or if you have questions regarding NetDMR submissions, please contact the Water Management Administration via email at mde.netdmr@maryland.gov or by phone at 410-537-3520 and the Department will address your concerns or questions. You may also visit our webpage at http://www.mde.state.md.us/programs/Water/Compliance/Pages/index.aspx to review our NetDMR brochure for upcoming training opportunities. Additional NetDMR support is available at https://netdmr.zendesk.com/home.

Site Walkthrough

During today’s site walkthrough, all areas of potential contamination were inspected to ensure compliance with the SWPPP and the Permit No. 12-SW. Mr. Yearwood informed me that customers are not allowed in the vehicle storage area and the facility is responsible for removal of parts from vehicles. Almost all hoods on vehicles were closed.

Vehicles that could not have hoods closed had all batteries removed to prevent stormwater exposure. There were no batteries exposed to stormwater onsite. Throughout the lot, there was various staining on the stone that was under the vehicles. The staining is from leaks/spills from the vehicles and has the potential to contaminate stormwater during a
rain event. The facility should frequently monitor the lot and if any staining is noticed, the stained material should be removed and disposed of properly to prevent stormwater contamination. By the dismantling area, there was a vehicle part that was exposed to stormwater and had staining around it from a leak (see photos). The facility should ensure that vehicle parts that have the potential to leak and/or have an oil/lubricated coating are kept out of exposure to stormwater. The facility had a scrap dumpster onsite, it was requested that this scrap dumpster be tarped to prevent exposure of old vehicle parts to stormwater.

Part washing was observed onsite during today’s site walkthrough. The washwater was not being contained and was flowing through the lot. The washwater was observed to have oil sheen (see photos) The Permit No. 12-SW states that “The discharge of vehicle and equipment washwater, including tank cleaning operations is not authorized by this permit. These wastewaters must be covered by a separate NPDES permit, discharged to a sanitary sewer in accordance with applicable industrial pretreatment requirements, or disposed of otherwise in accordance with applicable law.” I informed Mr. Yearwood that this washwater should be collected and disposed of properly or discharged to the sanitary sewer line. Mr. Yearwood informed me that the floor drains in the maintenance area are directed to the sanitary sewer line. If the facility decides to wash vehicle parts over the sanitary sewer line, they should receive authorization under a separate wastewater discharge permit through the City of Baltimore.

With respect to the above MDE authorization the following violations of Environment Article Title 9, by Y&R Eastside Auto Recycling were observed this date with corrections needed immediately:

1) There were no quarterly visual stormwater monitoring records available for review. The facility is not following the compliance schedule in accordance to Permit conditions. **The facility should complete/document quarterly visual monitoring of stormwater at a designated outfall location indicated in the SWPPP in accordance to Permit conditions.**

2) There were no quarterly routine facility inspections available for review. The facility is not following the compliance schedule in accordance to Permit conditions. **The facility should follow the compliance schedule and complete/document routine facility inspections.**

3) There were no annual comprehensive site evaluations available for review. The facility is not following the compliance schedule in accordance to Permit conditions. **The facility should complete/document annual comprehensive site compliance evaluations in accordance to Permit conditions.**

4) There were no annual employee SWPPP training records available for review. The facility is not following the compliance schedule in accordance to Permit conditions. **The facility should complete/document annual employee SWPPP training in accordance to Permit conditions.**

5) The facility has not properly completed and reported benchmark monitoring results through NetDMR in accordance to Permit requirements. **The facility should complete and submit quarterly benchmark monitoring results properly through NetDMR per Permit conditions.**

6) By the dismantling area, there was a vehicle part that was exposed to stormwater and had staining around it from a previous leak. **The facility should ensure that vehicle parts that have the potential to leak and/or have an oil/lubricated coating are kept out of exposure to stormwater.**

7) Part washing was observed onsite during today’s site walkthrough. The washwater was not being contained and was flowing through the lot. The washwater was observed to have oil sheen. **Washwater should be collected and disposed of properly or discharged to the sanitary sewer line. If the facility decides to wash vehicle parts over the sanitary sewer line, they should receive authorization under a separate wastewater discharge permit through the City of Baltimore.**

STATE LAW PROVIDES FOR PENALTIES FOR VIOLATIONS OF MARYLAND ENVIRONMENT ARTICLE TITLE 9 FOR EACH DAY THE VIOLATION CONTINUES. THE MARYLAND DEPARTMENT OF THE ENVIRONMENT MAY SEEK PENALTIES FOR THE AFOREMENTIONED VIOLATIONS OF TITLE 9 ON THIS SITE FOR EACH DAY THE VIOLATION CONTINUES.
For information regarding NetDMR submission and reporting, contact Bill Lee of the Department’s Compliance Program at wlee@maryland.gov or at 410-537-3514.

A follow-up inspection of this facility will be conducted.

Any questions regarding this report can be referred to Benjamin Wells at 410-537-3526 or at Benjamin.wells@maryland.gov.

A copy of this report was forwarded to Mr. Yearwood.

### NPDES Industrial Stormwater

<table>
<thead>
<tr>
<th>Inspection Item</th>
<th>Status</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Does the facility have a discharge permit? [Environment Article §9-323(a)(1-3)]</td>
<td>No Violations Observed</td>
<td>begin checklist_item 1000241212 29787 1end checklist_item 1000241212 29787 AIOO 23178</td>
</tr>
<tr>
<td>2. Has a Stormwater Pollution Prevention Plan (SWPPP) been implemented as required? [40 CFR Part 122 Subpart B Section 122.26.(c)(1)(i)(A-B)]</td>
<td>Out of Compliance</td>
<td>begin checklist_item 1000241212 29824 2See findings.end checklist_item 1000241212 29824 AIOO 23178</td>
</tr>
<tr>
<td>3. Is the number and location of discharge outfalls as described within the Stormwater Pollution Prevention Plan (SWPPP)? [40 CFR Part 122 Subpart B Section 122.26.(c)(1)(i)(A-B)]</td>
<td>No Violations Observed</td>
<td>begin checklist_item 1000241212 29825 3end checklist_item 1000241212 29825 AIOO 23178</td>
</tr>
<tr>
<td>4. Are identified outfalls representative of stormwater discharges from the site? [40 CFR Part 122 Subpart B Section 122.26.(c)(1)(i)(A-B)]</td>
<td>No Violations Observed</td>
<td>begin checklist_item 1000241212 29826 4end checklist_item 1000241212 29826 AIOO 23178</td>
</tr>
<tr>
<td>5. Does the Stormwater Pollution Prevention Plan (SWPPP) require modifications to prevent runoff of pollutants? [40 CFR Part 122 Subpart C Section 122.42.(b)(1-3)]</td>
<td>No Violations Observed</td>
<td>begin checklist_item 1000241212 29827 5end checklist_item 1000241212 29827 AIOO 23178</td>
</tr>
<tr>
<td>6. Are adequate records being maintained for the quarterly routine facility inspections? [Environment Article §9-261(a)(2)]</td>
<td>Out of Compliance</td>
<td>begin checklist_item 1000241212 29828 6See findings.end checklist_item 1000241212 29828 AIOO 23178</td>
</tr>
<tr>
<td>7. Are adequate records being maintained for the quarterly visual monitoring? [Environment Article §9-261(a)(2)]</td>
<td>Out of Compliance</td>
<td>begin checklist_item 1000241212 29829 7See findings.end checklist_item 1000241212 29829 AIOO 23178</td>
</tr>
<tr>
<td>8. Are adequate records being maintained for the annual comprehensive evaluation? [Environment Article §9-261(a)(2)]</td>
<td>Out of Compliance</td>
<td>begin checklist_item 1000241212 29830 8See findings.end checklist_item 1000241212 29830 AIOO 23178</td>
</tr>
<tr>
<td>9. Are adequate records being maintained for the employee training who are implementing activities necessary to meet the conditions of the permit? [Environment Article §9-261(a)(2)]</td>
<td>Out of Compliance</td>
<td>begin checklist_item 1000241212 29831 9See findings.end checklist_item 1000241212 29831 AIOO 23178</td>
</tr>
<tr>
<td>10. If monitoring of benchmark parameters is required, has the permittee performed the required quarterly monitoring? [COMAR 26.08.04.03A(2)]</td>
<td>Out of Compliance</td>
<td>begin checklist_item 1000241212 29832 10See findings.end checklist_item 1000241212 29832 AIOO 23178</td>
</tr>
</tbody>
</table>
11. If monitoring of benchmark parameters is required, has the permittee submitted quarterly benchmark monitoring results electronically within the allotted time? [COMAR 26.08.04.03C(2), 40 CFR Part 127.16]  
Out of Compliance  
begin checklist_item 1000241212 29833 11See findings.end checklist_item 1000241212 29833 AIOO 23178

12. Were visible pollutants observed in the receiving waters or in a position likely to pollute water of the State? [Environment Article §9-322]  
Out of Compliance  
begin checklist_item 1000241212 29834 12See findings.end checklist_item 1000241212 29834 AIOO 23178

13. If discharges were observed, were samples of the discharge taken? [Environment Article §9-261(c)(1)]  
Not Evaluated  
begin checklist_item 1000241212 29835 13See_end checklist_item 1000241212 29835 AIOO 23178

Benjamin Wells/Date  
benjamin.wells@maryland.gov  
410-537-3526  
Inspector: 6/16/2017  
Received by: ________________________________  
Signature/Date  
__________________________________  
Print Name