
North Coast Regional Water Quality Control Board

INSPECTION MEMO

Name and Location of Facility Inspected

Eel River Scrap and Salvage
850 Riverwalk Dr.
Fortuna, Humboldt County

Industrial General Permit

WDID #: 1 12I017276

Inspection Date

February 8, 2023

Inspection Time

Start time: 9:20 am End time: 11:10 am

Names & Titles of Site Representative

Dominic Hardin, new Facility owner
Jaden Weitz, Facility staff

Consent for inspection Provided?

Yes, by Jaden Weitz

Notified of Inspection?

No, unannounced inspection was conducted.

Inspector Name & Affiliation

Farzad Kasmaei, Regional Water Board

Weather Conditions at the Time of the Inspection: No rain during the inspection

Facility Receiving Water Name(s): Eel River and Strongs Creek

Inspection Memo Prepared By: Farzad Kasmaei

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A. Background

The Eel River Scrap and Salvage is a 13-acre auto dismantler located at 850 Riverwalk Dr, in the City of Fortuna (Facility). The Facility is located at a latitude and longitude of 40°35'08.4"N and 124°09'29.1"W, respectively. The Facility operations consist of auto dismantling, scrap metal, and chipping and grinding operations. The Facility also receives concrete and green wastes as well as Construction and Demolition Debris (C&D Materials) besides scrap metals. The Facility is regulated under order No. 2014-0057-DWQ, NPDES No. CAS000001 Industrial General Permit (Industrial General Permit, IGP, or Permit). The Facility's runoff is conveyed through an onsite drainage ditch and multiple onsite storm drain inlets before discharging to Strongs Creek, a tributary to Eel River which is impaired for sedimentation and temperature.

Regional Water Board staff inspected the Facility in 2019 and observed several Best Management Practices (BMP) deficiencies. Also, the hard copies of documents and reports such as stormwater training log and monthly visual observation reports were not available on-site during that inspection. Also, the Discharger was notified that they were not in compliance with the sampling frequency requirements¹ and the requirement to submit the sampling results via Ad Hoc reports within the (SMARTS) database.

An updated site map was uploaded to SMARTS in 2020 to reflect the current condition of the site. However, the SWPPP and site map have not been updated since that time.

Due to several annual NAL exceedances, the Facility is currently no longer in baseline status for multiple analytical parameters including Total Suspended Solids (TSS), Oil and Grease, Zinc, Lead, Iron, Copper, Chemical Oxygen Demand (COD), Magnesium and Aluminum.

Prior to the inspection conducted on February 8, 2023, the Discharger was notified that they must submit the past due annual report for the reporting year 2021-22 to avoid further violations.

B. Inspection Narrative and Findings

Regional Water Board staff arrived at 9:20 a.m. and met Facility representatives Ms. Adrianna Hardin and Mr. Jaden Weitz at the office. Mr. Dominic Hardin, the Legally Responsible Person (LRP) was not present at the time of the arrival; however, he joined us later during the inspection.

During the inspection the Discharger was reminded to submit the past due level 1 and level 2 Exceedance Response Action (ERA) technical reports via SMARTS. The Discharger confirmed that a new consultant was recently hired to prepare and submit

¹ A minimum of 4 samples during each reporting year

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the required documents and past due reports.

Hard copies of the updated site map along with the monthly visual observation reports and stormwater training log were not available on-site. The Facility crew informed me that Jim, former Facility staff, was responsible for the sampling, monitoring and reporting but he is no longer working for this Facility since last year. Also, per SMARTS, Harry Hardin is the current Legally Responsible Person (LRP) for this Facility. However, during the inspection, I was informed that the Facility property title was transferred to his sons, Dominic and Dino Hardin. As a result, the Discharger is currently in violation of the IGP requirements for failure to change the ownership and LRP in SMARTS.

We walked through the Facility and inspected the eastern portion of the Facility where the samples are collected. Hydrocarbon spills were observed within this area (Picture 1). Also, hydrocarbon spills and oil sheens were observed on the ground at multiple locations including the fueling storage areas (Pictures 4a, 4b, 11, 17a, 17b). I reminded Mr. Weitz that the Facility is currently at level 1 status for Oil and Grease due to annual NAL exceedances during previous reporting years. I stated that it is critical to ensure that the spill prevention and response requirements are fully met at the Facility and Facility crew is properly trained.

I also notified the Discharger that even if hydrocarbon spills originate from contractor's trucks not owned by the Discharger, it is LRP's responsibility to ensure that his contractor are using well-maintained vehicles and equipment and that spills are prevented and managed. The spill prevention kits were available on-site as required by IGP (Pictures 7a and 7b) but were not in use to address the observed spills.

The warehouse where the Construction and Demolition Debris (C&D materials) are received and processed was inspected. Due to lack of maintenance, the storm drain inlet located at the low point of the loading dock adjacent to the warehouse was plugged. As a result, the loading dock was full of stormwater remaining from previous storm events (Picture 6). The Discharger was informed that all storm drainage systems including the stormwater drain inlets and drainage ditches must be maintained routinely, specifically prior to each Qualifying Storm Events (QSEs).

The inlet adjacent to the C&D building that is one of the Facility's sampling points was protected by haybales and fiber rolls (Pictures 5 and 6). An uncovered dumpsters full of scrap metals and wastes was stored adjacent to this inlet. Also, this inlet partially receives runoff from the areas where scrap metal stockpiles are stored. I reminded the Discharger that the Facility is currently at level 2 status for multiple metals due to several annual NAL exceedances that were occurred for those parameters during the past reporting years. Per the IGP, a site assessment must be conducted, and a technical report must be prepared by a QISP². I stated that adequate/effective BMPs

² Qualified Industrial Stormwater Practitioner

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must be implemented and installed in accordance with the ERA technical report. Also, the site map and SWPPP must be updated accordingly. These documents have not been submitted via SMARTs and are past due.

Most of the dumpsters, drums, and barrels that are used to store wastes and scrap metals are very old, rusty, and in poor condition. These containers are not sealed, and they are not equipped with appropriate lids to minimize the exposure of industrial materials to rain (Pictures 2, 8, 13 and 18). Using lidded and sealed dumpsters/containments was strongly suggested since these rusty containments can be considered as pollutant sources.

Significant amount of waste stockpiles including scrap metals and rusty auto parts were observed throughout the Facility with no adequate/effective BMPs (Pictures 8, 12, 14 and 15). Housekeeping and source control is not implemented at the Facility, which is a violation of the IGP requirements.

The stormwater drainage system including the existing drainage ditch is in a poor condition and in need of maintenance. Also, the existing site map indicates that check dams shall be installed at the ditch area. However, no check dams were observed during the inspection (Picture 16).

The newly installed structural cover within the truck washing area was then inspected. The existing trench drain under the roofed area is connected to an oil/water separator system; however, it does not fully capture the wash/rinse water and associated hydrocarbons. Non-stormwater runoff was observed on the ground flowing toward the storm drain inlet beyond the covered truck washing area (Pictures 9 and 10). Oil sheen was observed in this runoff. I notified the Discharger that they needed to proceed with the corrective actions in a manner to avoid any unauthorized non-stormwater discharges. The Discharger was reminded to meet the non-stormwater discharge requirements including sampling and reporting when such unauthorized discharges occur.

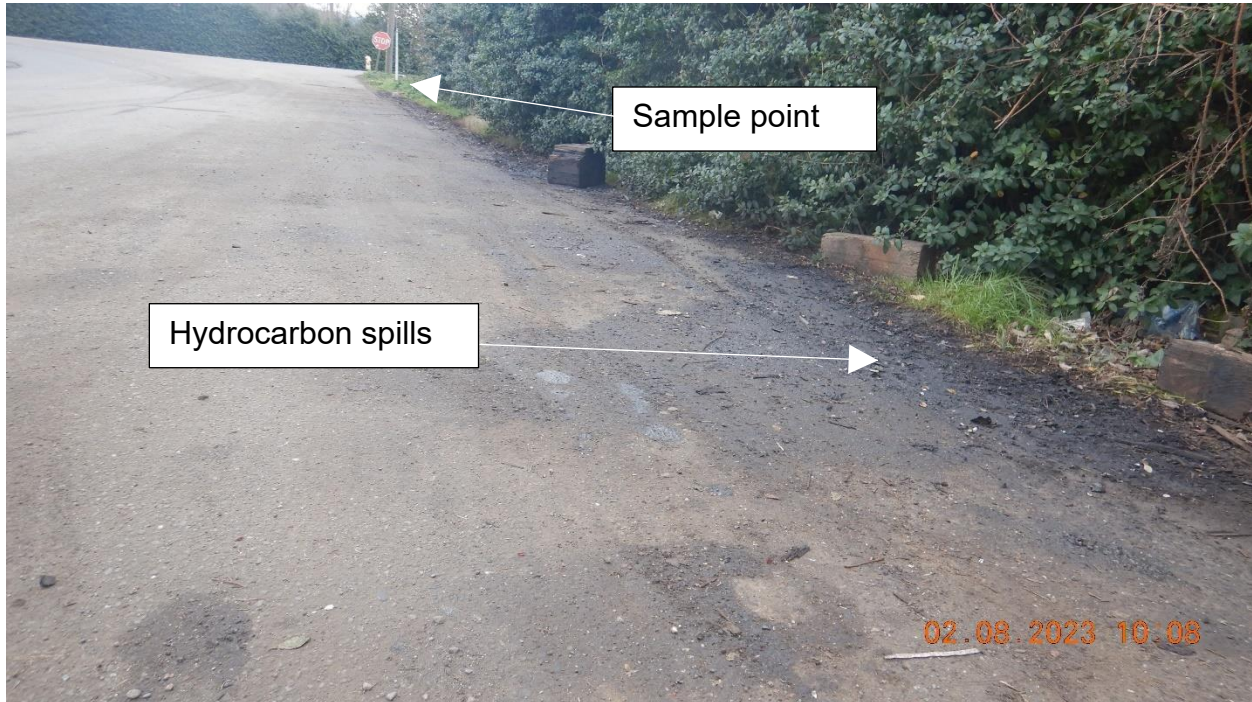
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Attachment(s):

1. Pictures
2. Facility Site map

Pictures:



Picture 1- View of the Hydrocarbon spills on the ground upstream of sampling point at the southeast corner of the Facility. Picture taken by Farzad Kasmaei.

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Picture 2- View of the old and rusty dumpsters on the east side of the Facility. Picture taken by Farzad Kasmaei.



Picture 3- Looking west at the on-site storm drain inlet on the east side of the Facility. Picture taken by Farzad Kasmaei.

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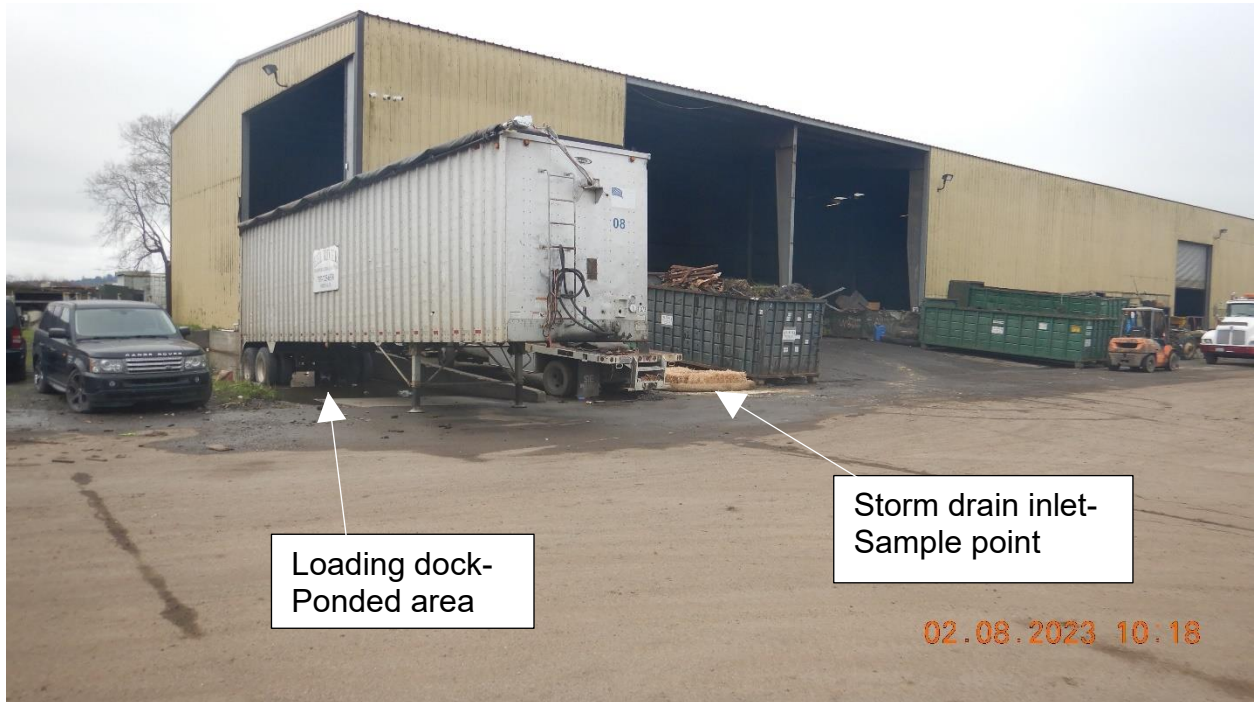
Pictures 4a, 4b - View of the fueling tank and secondary containment stored within a roofed area. Hydrocarbon spill was observed within this area. Picture taken by Farzad Kasmaei.



Picture 5- View of a storm drain inlet (sampling point) adjacent to an uncovered dumpster containing waste materials. Haybales and fiber rolls are used for inlet protection. Picture taken by Farzad Kasmaei.

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Picture 6- View of the existing warehouse where C&D materials are received and processed. Ponded area within the loading dock adjacent to the warehouse. Picture taken by Farzad Kasmaei.



Pictures 7a, 7b – Picture of spill prevention kit including absorbent pads and socks. Picture taken by Farzad Kasmaei.

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Picture 8- View of wastes on the ground with no BMPs in place. All dumpsters at the Facility are uncovered, in poor condition, and significantly rusty. Picture taken by Farzad Kasmaei.



Picture 9- View of the newly installed structural covered area where the trucks are washed. Wash/rinse water (non-stormwater) is not fully captured within the existing trench drain that is connected to the oil/water separator. Picture taken by Farzad Kasmaei.

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Picture 10 - View of non-stormwater runoff from truck washing area. Oil sheen was observed on the surface of runoff. Generated runoff within this paved area discharges to an onsite storm drain inlet. Picture taken by Farzad Kasmaei.
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Picture 11 - View of oil sheen that was observed within a ponded area. Picture taken by Farzad Kasmaei.

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Picture 12 - View of the scrap metals that are baled/crushed and stored within the unpaved area. No BMPs observed to minimize the exposure of industrial materials (pollutant sources) to rain. Picture taken by Farzad Kasmaei.

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Picture 13 – View of the rusty auto parts and scrap metals that are stored in very old and rusty containments on the west side of the Facility. These storage bins are not sealed, and no lids or appropriate covers are provided. Picture taken by Farzad Kasmaei.

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Picture 14 – View of scrap metals and wastes stockpile that are stored on the unpaved area. Source control is not implemented and no BMPs were observed to minimize the exposure to rain. The concrete blocks installed around the waste materials is not considered as a perimeter control BMPs and they are not effective. Picture taken by Farzad Kasmaei.

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Picture 15 – View of the concrete and scrap metal stockpiles at the central portion of the Facility. Runoff from this area is discharged ton an on-site drainage ditch, that is in need of maintenance, before eventually discharging off the site to Strongs Creek. Picture taken by Farzad Kasmaei.

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Pictures 16 – View of the existing drainage ditch. The ditch is buried under lumber and wastes and it is not maintained. No check dams were observed within the ditch as indicated on the site map. This drainage ditch eventually discharging off the site to Strongs Creek. Picture taken by Farzad Kasmaei.



Pictures 17a, 17b – View of the fueling storage area. Oil sheen was observed within this area. No BMPs were present. Picture taken by Farzad Kasmaei.

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Picture 18 – Looking north at the ponded area within the west side of the Facility. The scrap metals are stored inappropriately in old/rusty barrels. These barrels are in poor conditions and not covered. Note- Background aggregate stockpiles are not associated with this Facility. Picture taken by Farzad Kasmaei.

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Site Map:



Picture 19 – Site map shows the location of the immediate receiving water (Strongs Creek) and Eel River and sample points.