



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

**VIA UPS OVERNIGHT MAIL**

Andrew R. Andreasik  
Vice President and Senior Real Estate Counsel  
Potomac German Auto, Inc. and LKQ Northeast, Inc.  
c/o LKQ Corporation  
500 West Madison Street, Suite 2800  
Chicago, Illinois 60661  
[axandreasik@lkqcorp.com](mailto:axandreasik@lkqcorp.com)

Re: EPA Docket No. CWA-03-2021-0095DN  
ADMINISTRATIVE ORDER ON CONSENT TO ADDRESS STORMWATER VIOLATIONS

Dear Mr. Andreasik:

Attached is the executed Administrative Order on Consent (“AOC”) concerning violations of the Clean Water Act (“CWA”), as amended, 33 U.S.C. § 1251, et seq. The United States Environmental Protection Agency (“EPA”) is issuing this AOC to Potomac German Auto, Inc. and LKQ Northeast, Inc. (“Respondents”) under the authority of Section 309(a) of the Clean Water Act (“CWA” or “Act”), 33 U.S.C. § 1319(a), to address violations at seven auto salvage yards in Maryland and Pennsylvania, owned and operated by the Respondents. The AOC requires the Respondents to submit certain documents to EPA and implement certain activities in order to comply with the requirements of facilities’ applicable state General Permit for Stormwater Discharges Associated with Industrial Discharges, Permit No. 12SW in Maryland and PAG-03 in Pennsylvania (collectively, “General Permits”).

Specifically, the Order in the AOC requires the Respondents to:

- (1) Provide to EPA the most recent version of the SWPPP (for Maryland facilities) and PPC Plan (for Pennsylvania facility) for each of the Facilities, any amended SWPPP or PPC Plan;
- (2) Increase the frequency of the visual inspections and routine facility inspections required by the General Permits from quarterly (as required by the General Permits) to monthly, for the remainder of year 2021 through December 31, 2023;
- (3) Submit to EPA, for the years 2021 through 2023, an Annual Industrial Stormwater Audit for each of the 7 Facilities, along with completed Monthly Inspection Forms;
- (4) Within sixty (60) days of completion of the Audit for each facility, provide to EPA a Corrective Action Plan (“CAP”) to address any deficiencies identified in the Annual Audit for that facility.
- (5) Implement each CAP in full.

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Please note that the effective date of this AOC is today, the date of your receipt of this document.

If you have any questions regarding the AOC, please contact Natalie Katz, Senior Assistant Regional Counsel, at (215) 814-2615 or [katz.natalie@epa.gov](mailto:katz.natalie@epa.gov).

Sincerely,

Karen Melvin, Director  
Enforcement & Compliance Assurance Division

Enclosure: Executed Administrative Order on Consent

cc: David Rieser, K&L Gates LLP ([david.rieser@klgates.com](mailto:david.rieser@klgates.com))  
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