



**REGION 3**

PHILADELPHIA, PA 19103

**SENT VIA ELECTRONIC SERVICE**

John Rutan, Environmental Compliance Manager  
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**Re: Administrative Order – Docket No. CWA-03-2021-0095DN  
Potomac German Auto, Inc. and LKQ Northeast, Inc. c/o LKQ Corporation  
LKQ facilities in Jessup, MD; Mt. Airy, MD; Edgewood, MD; Erdman, MD; Hawkins Point, MD;  
Easton, MD; and York Haven, PA**

Dear Mr. Rutan:

On September 22, 2021, the United States Environmental Protection Agency, Region 3, (“EPA”) issued the above-referenced Administrative Order on Consent (“Order”) to Potomac German Auto, Inc. and LKQ Northeast, Inc. c/o LKQ Corporation (“Respondents”) regarding their facilities in Jessup, MD; Mt. Airy, MD; Edgewood, MD; Erdman, MD; Hawkins Point, MD; Easton, MD; and York Haven, PA and compliance with their respective Industrial Stormwater National Pollutant Discharge Elimination System (“NPDES”) Permits, Permit Number MDR002262; MDR003074; MDR002259; MDR001257; MDR001880; MDR001037; and PAR603587, respectively. For each facility, the Order required the Respondents to:

- 1) Submit an updated Stormwater Pollution Prevention Plan (SWPPP) for Maryland facilities and Pollution Prevention and Contingency Plan (PPC Plan) for the Pennsylvania facility;
- 2) Until the end of 2023, increase the frequency of visual inspections and routine facility inspections from quarterly to monthly;
- 3) Until the end of 2023, submit an Annual Industrial Stormwater Audit (Annual Audit), which included reports for the visual inspections and routine facility inspections required under number 2, above; and;
- 4) Based on the results of the Annual Audit, provide a Corrective Action Plan (“CAP”) to address any deficiencies identified in the Annual Audits.

The EPA received the above-mentioned deliverables for all facilities, with the exception of the Jessup, MD facility, which was vacated February/March 2022 and whose NPDES permit was terminated as of August 1, 2022. The final deliverable for the facilities was a letter, dated March 28, 2024, containing CAPs for all of the facilities. In the March 28 letter, Respondents requested termination of the Order. Based on the EPA’s review, the Respondents have complied with all actions required by the Order, and the EPA is therefore terminating the Order.

Note that the Respondents must continue to comply with all applicable Clean Water Act (“CWA”) requirements and applicable NPDES permits. Any noncompliance with the CWA or a current or future NPDES permit could result in the initiation of an additional enforcement action pursuant to the federal enforcement provisions set forth in Section 309 of the CWA, 33 U.S.C. § 1319. You are therefore encouraged to pay close attention to all permit conditions at all times, and to maintain and implement any plans or Standard Operating Procedures (“SOPs”) to assure compliance.

Thank you for your cooperation in this matter. If you have questions regarding any of the above information or future compliance obligations, please contact Shane McAleer, NPDES Enforcement, Enforcement and Compliance Assurance Division, at (215) 814-5616 or [mcaleer.shane@epa.gov](mailto:mcaleer.shane@epa.gov), or have your attorney 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 and Compliance Assurance Division

cc: EPA R3, Regional Hearing Clerk ([R3\\_Hearing\\_Clerk@epa.gov](mailto:R3_Hearing_Clerk@epa.gov))  
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