

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: Summit, Inc.

EPA ID No.: N/A

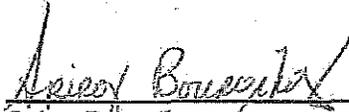
LOCATION ADDRESS: 6901 West Chicago Avenue
Gary, IN 46406

NAICS CODE: 423930 (Automobile Salvage Facility)

DATE OF INSPECTION: April 2, 2008

U.S. EPA INSPECTOR: Spiros Bourgikos

PREPARED BY:


Spiros Bourgikos
Environmental Engineer

4/23/08
Date

REVIEWED BY:


Mary S. Setnicar, Acting Chief
Compliance Section 1
RCRA Branch
Land and Chemicals Division

4/23/08
Date

Purpose of Inspection

The purpose of the inspection was to conduct an inspection at Summit, Inc. (Summit) located at 6901 West Chicago Avenue, Gary, Indiana 46406, to determine whether Summit generates and/or handles hazardous waste and its compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), specifically those regulations related to the management of hazardous waste. This was an announced inspection. On April 1, 2008, and approximately 3:00 pm, CDT, I called Summit and stated that U.S. EPA was planning to visit the facility on April 2, 2008, and requested that the owner and/or general manager be present to assist us with our inspection. The Indiana Department of Environmental Quality (IDEM) was notified of this inspection on March 1, 2008. Rosemary Cantwell and Dorel Hunt represented IDEM in this inspection.

Participants:

Spiros Bourgikos, U.S. EPA, RCRA Inspector
Sue Rodenbeck Brauer, U.S. EPA, RCRA Used Oil Expert
Ken Zolnierczyk, U.S. EPA, Pesticides/Toxics Compliance Section
Rosemary Cantwell, IDEM
Dorel Hunt, IDEM
Peter Coulopoulos, Summit
David S. Green, ATC Associates, Inc.

Inspection Pre-meeting:

Prior to the inspection, representatives of the U.S. EPA and IDEM held a pre-inspection meeting at the Highland, Indiana, Fire Station to discuss the inspection agenda. William Timmer, Highland Indiana, Fire Chief was present at the meeting and gave us a brief history of the Summit site.

Opening Conference:

On April 2, 2008, we arrived at Summit, at approximately 10:00 am, driving in two separate vehicles. Mr. Coulopoulos, the owner of Summit, arrived at the same time and greeted us as we exited our vehicles. Mr. Green arrived a few minutes later. Mr. Coulopoulos escorted us into his office where we introduced ourselves and presented our enforcement credentials. At this point, I explained the purpose of our visit and I gave Mr. Coulopoulos the Small Business Resources information sheet. I also provided Mr. Coulopoulos a copy of the promotional brochure titled,

“Strengthening Indiana’s Economic Development by Promoting Clean Manufacturing technology”, detailing the services offered by Clean Manufacturing Technology Institute (CMTI). I noted that CMTI is a non-regulatory service organization affiliated with the Purdue University. I also mentioned that, CMTI has been providing assistance to companies in Indiana

since 1994 and has worked with Indiana manufactures to reduce operating costs and improve efficiency.

Plant Description/Background

Summit is an automobile salvage yard. The site includes approximately 40 acres bordered by Chicago Avenue to the North, Industrial Highway to the Northeast and the Gary Airport to the Southeast. Mr. Coulopoulos owns Summit and part of the land. Currently he is the process of purchasing the remaining land from his father. According to Mr. Coulopoulos, his father started the business in the early 1970s. He started working there right out of college and purchased the business in 2002. Summit employees 68 people and is open 5 days a week, 8.5 hours per day. It is also open some Saturdays for just a few hours. Summit deals in obsolete scrap versus industrial scrap¹. Summit receives approximately 100 cars per day and ferrous scrap delivered by street collectors. At the site, Summit uses two crushers to crash the cars before it sends them to be shredded at either Metal Management Midwest, Inc., or General Iron. According to Mr. Coulopoulos, crushing enables Summit to load 16 cars on a flat bed trailer versus 9 non-crashed. According to Mr. Coulopoulos, before crushing, Summit removes the car catalytic convertors, alternators and starters, drains any gasoline from the cars, removes the car battery and the mercury switches. Car fluids such as engine and transmission oil and radiator antifreeze are not removed prior to crushing. According to Mr. Coulopoulos, it is very labor intensive to take out the oil pan, open up the transmission and empty the radiator. Mr. Coulopoulos also stated that pumping out engine oil is difficult, especially in the winter because of the high viscosity of the oil.

Summit does not use any degreasing equipment.

On Site Observations:

We started the facility tour by walking east along Chicago Avenue. The first building we encountered was the scale house. The scale house is a two story structure where street collectors weigh their loads. On the ground level of this building Summit conducts some vehicle maintenance². We walked through this maintenance area and did not observe any hazardous materials.

East of the scale house along Industrial Highway there is a large cement pad. On this pad, Summit has two car crushers and a three sided shed where gasoline is drained before the cars are crushed. Cars are stacked two high in the crusher (see Photograph No. 1). The crusher is equipped with a collection pan that collects the car fluids while the cars are crushed and drains into a five gallon bucket (see Photograph No. 2). For a detail description of the Summit crushing operations and its management of the oil generated by the crushing of cars, please see Sue Brauer's April 11, 2008 inspection report (Attachment 2).

¹ Industrial scrap according to Mr. Coulopoulos is "clean scrap", i.e., never painted.

² Summit farms out most of its equipment maintenance.

Once crushed, cars are placed in a metal pan where fluids are drained farther (see Photograph Nos. 3 and 4).

Further down the pad, next to the shed, I observed a plastic tote (see Photograph Nos. 5 and 6) full of car batteries. The batteries close to the top of the tote seemed to be intact. However, the tote was one third full with some type of liquid. Mr. Coulopoulos could not say with any degree of certainty whether the liquid inside the tote was water or battery fluid. According to Mr. Coulopoulos the tote is supplied by T&S Trading, Inc. (T&S). T&S picks up the tote with the batteries at the end of each shift and leaves one new tote behind. Back at the office after the conclusion of the facility tour I requested the T&S invoices for 2008.

Next to the tote there were two five gallon un-marked buckets that contained mercury switches (see Photograph No 7).

Further southeast, along Industrial Highway and adjacent to the second crusher (see Photograph no. 8), there was a second tote that contained car batteries (see Photograph No. 9). This tote did not contain any free liquid. However, the tote had what seemed to be a two inch opening at the bottom of it (see Photograph No. 10). Adjacent to this tote, more batteries were stored in the back of a pickup truck. At least two of the batteries appeared to be broken (see Photograph No. 11).

Crushed cars are stored six high on wooden pallets. The U.S. EPA and IDEM inspectors walked south between stacks of cars with Mr. Coulopoulos and Mr. Green. The wooden pallets seemed to be saturated with oil. There were also oil drips visible on the muddy surface below the wooden pallets (see Photograph Nos. 12 and 13).

Further south, we visited an area where Summit stores semi-trailers. According to Mr. Coulopoulos, the semis are dismantled manually as time allows.

Next, Mr. Coulopoulos took us to a property south of Summit, which according to him is now owned by the city of Gary where tarry tank bottoms have been disposed (see Photograph Nos. 14 and 15). Mr. Coulopoulos complained that nothing is being done to clean this area. He also stated that Gary plans to cap the contaminated area and expand the Gary Airport runway. Mr. Coulopoulos stated that he has been in contact with Steve Faryan of the U. S. EPA, Region 5, Superfund Division concerning this issue. He complained that not everybody is regulated equally.

Coming back into the Summit property, we walked by the baler (see Photograph No. 16). This area is where scrap delivered by street collectors is sorted and baled. Walking through this area, we observed at least three hydraulic shears cutting and sorting scrap (see Photograph No. 17).

Closing Conference:

At the conclusion of the inspection, the inspectors provided a brief closing conference. I advised Mr. Coulopoulos to improve the storage of car batteries. I was especially concerned with the tote

with the two inch opening. Mr. Coulopoulos stated that he could place the totes inside a containment pan.

Attachments:

Attachment 1: Photograph Log

Attachment 2: Sue Brauer's April 11, 2008 Inspection report.

