

## Scrapyard Taskforce FAQ

### **What Is the Scrapyard Task Force?**

The Scrapyard Task Force (STF) includes City of Philadelphia departments and state and federal agencies involved in regulating and supporting scrap metal and auto salvage businesses operating in the city.

### **Who is involved with the STF?**

Currently, the agencies and units regularly involved in the STF include:

- Philadelphia Water Department (PWD) - Watershed Protection
- Pennsylvania Department of Environmental Protection (PADEP) - Solid Waste Division
- Philadelphia Department of Licenses and Inspection (L&I)
- Philadelphia Police Department - Auto Squad
- Philadelphia Fire Department - Hazardous Materials (Hazmat) Administration

The Zero Litter and Waste Cabinet is a frequent attendee of the STF inspections. Specialists from other City of Philadelphia agencies such as the Health Department, PWD Industrial Waste Unit, Streets Department attend the STF inspections if they are available or are referred locations of sites which can be inspected by the individual agencies.

The U.S. Environmental Protection Agency (EPA), PADEP Water Quality Division, and the Pennsylvania Fish & Boat Commission may also play a role in STF meetings and inspections.

### **How long has the STF operated?**

The STF was initiated in 2003 by EPA Region 3, which serves Philadelphia and the mid-Atlantic region. In 2008, the Philadelphia Water Department (PWD) took over the Scrapyard task force as STF Coordinator.

### **What Is the STF mission?**

The STF mission is to help scrap and salvage operations achieve compliance with applicable federal, state and local regulations and codes. These businesses provide important services and are a source of local jobs, but full compliance with regulations and industry best practices is necessary to ensure environmental protection and safe conditions for communities, customers and employees.

Task force goals include immediate and long-term solutions that:

- Improve quality of life and safety conditions in our communities
- Protect the environment and local water sources
- Ensure clear regulations guiding the operation of these businesses are in place and enforced.

### **Why was the STF created?**

Auto salvage and scrap metal operations that fail to comply with laws, regulations and industry best practices can create serious health, safety and environmental risks for neighbors, customers, and employees.

Additionally, regional agencies and municipalities who share the Delaware River watershed as a drinking water and recreational resource have a stake in the Philadelphia Water Department's efforts to prevent impacts on water quality.

### **What are some major concerns the STF is addressing?**

Scrap and auto salvage operations that fail to follow regulations may cause polluted runoff to enter the City's sewers, create and encourage blight in City neighborhoods, and contribute to short dumping and other environmental/safety impacts that may affect waterways and neighboring properties.

### **What is the purpose of STF meetings and inspections?**

The primary focus of the STF meetings and inspections is to establish routine convening meeting/inspections where agencies that have a vested interest can regulate these sites in a unified effort. The STF provides education to salvage yard owners on how to safely manage a facility with current regulations including good housekeeping practices and controlling potential runoff.

### **What is considered a "scrapyard" by the Scrapyard Task Force?**

A scrapyard, as defined by the Scrapyard Task Force, is a business that conducts materials salvaging/dismantling activities that is open to the general public or commercial accounts. Scrapyards largely deal with metal or automotive items, which generally have the highest monetary value but are also more likely to require additional safety and environmental protection procedures. Some scrapyards also serve as automotive repair shops that sell salvage equipment or parts.

### **What businesses are not covered by Scrapyard Task Force activities?**

Businesses that conduct automotive repair only, auto detailers, general auto sales (new or used), tow truck companies, parking lots and garages, oversea shipping businesses or storage/overflow lots not associated with materials salvaging/dismantling activities are not currently under the purview of STF.

### **How often does the STF meet?**

The STF conducts meetings and inspections once a month, barring any cancellations due to inclement weather or scheduling problems. Meetings help prior to inspections recap last month's inspection and reveal the sites being inspected that month.

Prior history or information about the current site selection will be discussed at monthly meetings.

## **How many scrapyards are in Philadelphia?**

The STF manages a list of approximately 150 active scrapyards in Philadelphia. The exact number fluctuates often, as facilities change hands or shut down. Generally, the STF inspects four sites a month, resulting in sites being visited at least once every five years.

## **What is PWD's role as STF Coordinator and in inspections?**

As STF Coordinator, PWD selects inspection sites each month based a random list of operations that have not been inspected recently and occasionally complaints or sites of interest from STP members. PWD coordinates pre-inspection meetings and inspection dates with STF members.

During SFT visits, PWD inspects sites for water-related contamination issues, including potential discharges to the sewer system or surrounding waterway and the condition of any floor drains present, and proximity to stormwater inlets.

Fortunately, 75 percent of scrapyards do not have water and sewer service, which significantly reduces the likelihood of direct sewer contamination. In addition, many scrapyards are graded to drain toward the site's center to eliminate potential runoff issues.

## **What are the most common violations for scrapyards?**

- Improper labeling and signage
- Lack of appropriate permits or licenses
- Excessive municipal trash, debris or leaves

## **Have any regulations been put in place that impact and potentially benefit the STF?**

In 2008, a detailed description of prohibited conduct including prohibited items

In 2010, require junk dealers to secure adequate customer identification containing a photograph before conducting any business

In 2010, updated regulations on Penalties and Cease Operations Orders

In 2012, Update regulations to require records and receipts (name, date, type/amount of material, amount paid) are for all transactions

In 2015, PA passed a statute on the theft of secondary metal

In 2017, Updated prohibited conduct to include cutting of tires outdoors

## **What are the key regulations for businesses the SRT inspects?**

Regulations for businesses are often changing. Included below are typical regulations that each department may enforce.

The Department of Licenses and Inspections:

- Must be fenced with durable material to obscure the view of any person to the premises
- Valid licenses (depending on what practices takes place on site)
- The premise and exterior property should be free from weeds or plants growth in excess of 10 inches and in clean, safe, and sanitary condition.

- No person can use their sidewalk to conduct business
- Junk dealers are required to obtain customer identification before completing business transactions

The Philadelphia Fire Department - Hazmat :

- Proper storage of scrap tires
- Acceptance fire lanes with a width of at least 20 feet
- Proper labeling of containers, cartons, packages, etc.
- Control of combustibles, trash, debris, etc, to prevent fire

The Philadelphia Water Department:

- The right to inspect any property at reasonable times to ascertain the existence of unnecessary flow or leakage of water, to read the water meter, or to repair or replace the water meter.
- No person shall discharge pollutant into the any PWD system, storm or sewer.
- An oil interceptor is required if floor drains are present or engine work and washing is done

The Philadelphia Streets Department: (During STP inspections, L&I oversees these regulations as Streets does not attend unless specifically asked)

- No Litter in public areas, on sidewalks, or into any gutters.
- No short dumping
- Owner in control of premise shall maintain the yard, keeping it free of litter, at all times.

### **What happens after the STF inspects the property?**

The STF coordinator summarizes and documents observations seen during inspection. If necessary, referral agencies will be contacted. Follow up inspections from individual agencies may occur without notice to other taskforce members. Violations and other enforcement actions are handled within the individual agencies.

### **Are scrapyards ever re-inspected?**

If no major issues arise, the scrapyards are generally inspected at least once every 5 years.