



FLORIDA DEPARTMENT OF Environmental Protection

Southeast District Office
3301 Gun Club Road, MSC 7210-1
West Palm Beach, FL 33406
561-681-6600

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Secretary

December 9, 2022

Lorenzo Abreu, Owner
JDM Kings
13205 Cairo Ln.
Opa Locka, FL 33054
jdmkingsmiami@yahoo.com

Re: Compliance Assistance Offer
JDM Kings
SW Facility ID # FLR05I461
Miami-Dade County

Dear Mr. Abreu:

An inspection was conducted at your facility on November 15, 2022, under the authority of Section 403.091, Florida Statutes (F.S.). During this inspection, potential non-compliance was noted. The purpose of this letter is to offer compliance assistance as a means of resolving these matter(s).

Specifically, potential non-compliance with the requirements of Chapter 403, F.S, Chapter 62-621, Florida Administrative Code (F.A.C.) and NPDES Multi-Sector Generic Permit number FLR05I461 were observed. Please see the attached inspection report for a full account of Department observations and recommendations.

We request you review the item(s) of concern noted and respond in writing within **15 days** of receipt of this Compliance Assistance Offer. Your written response should include one of the following:

1. Describe what has been done to resolve the non-compliance issue or provide a schedule describing how/when the issue will be addressed
2. Describe what steps have been taken to prevent, to the extent practicable, a recurrence of the non-compliance.
3. Provide the requested information, or information that mitigates the concerns or demonstrates them to be invalid

It is the Department's desire that you are able adequately address the aforementioned issues so that this matter can be closed. Your failure to respond promptly may result in the initiation of formal enforcement proceedings.

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Please address your response and any questions to Henry Webster of the Southeast District Office at 561-681-6600 or via e-mail at Henry.Webster@floridadep.gov . We look forward to your cooperation with this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'S. Davila', with a stylized flourish at the end.

Sirena Davila, Assistant Director
Southeast District
Florida Department of Environmental Protection

Enclosure: Inspection Report

cc: Jesus Lopez, JDM Kings, asapscrap@gmail.com



Department of Environmental Protection Industrial Stormwater Inspection Report

Form DWRM - WCAP - 20 - 043

Updated 08.01.22



Facility and Inspection Information									
Physical Location: JDM Kings 13205 Cairo Ln. Opa Locka, FL 33054-4620				Permit No.: FLR051461		Inspection Date: Nov 15, 2022			
Mailing Address: JDM Kings 13205 Cairo Ln. Opa Locka, FL 33054				Effective Date: Jan 10, 2020		Entry Time: 10:15 AM			
				Expiration Date: Jan 9, 2025		Exit Time: 11:00 AM			
				District: Southeast		Hydrologic Conditions: Normal			
				County: Miami-Dade					
				Water Mgmt. SFWMD		Latitude: 25 ° 53 ' 39.18 "			
				District: SFWMD		Longitude: -80 ° 15 ' 24.25 "			
Receiving Waters or MS4: Outfall Little River Canal				No. Employees: 10		Size of Property (acres): 2			
				No. Shifts: 1		Years at Location: 2			
Classification: Class III Other: N/A				Operating Hrs.: 8:00 AM - 5:00 PM		No. of Outfalls: 1			
Industrial Activity									
SIC Code: 5015		Analytical Reqmnt: Yes		Sector: M		Sector Description: Automobile Salvage Yards			
Company Representatives									
On-Site Representatives				Title		Company/Organization Name		Telephone	
Jesus Lopez		Administrative Manager		JDM Kings		(305) 687-3200			
Responsible Authority (RA)				Title		Company/Organization Name		Telephone	
Lorenzo Abreu		Owner		JDM Kings		(954) 483-7753			
RA Email Address:				jdmkingsmiami@yahoo.com					
Inspection Comments									
This facility sells used Honda parts and accessories.									
Weather Conditions									
Possible rain events in the past 24 hours.									
Summary Evaluation									
Overall Inspection Rating: Out of Compliance									
Section Ratings:				Ratings Key:					
S	Permit			S = Satisfactory or In Compliance			N/A = Not Applicable		
S	Condition of Receiving Waters			M = Marginal or Out of Compliance			N/C = Not Covered		
M	Facility Site Review			U = Unsatisfactory or Significantly Out of Compliance					
U	Plans/Monitoring			N = Not Evaluated					
Inspector Information									
Inspector Name		Office		Email		Telephone			
Henry Webster		Southeast District Office		Henry.Webster@FloridaDEP.gov		(561) 681-6600			



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Permit

Is coverage under a Multi-Sector Generic Permit (MSGP) required?	Yes
If 'No,' why not?	Not Applicable
Has an MSGP been applied for?	Yes
If 'Yes,' is the permit Active?	Yes
If 'No,' why not?	Not Applicable
Comments:	
Rating: This item is rated as 'Satisfactory'.	

Condition of Receiving Waters

Is stormwater discharge apparent at the time of the inspection?	No
Is there evidence that there has been a discharge of polluted runoff to a regulated receiving water (past or present)?	No
If 'Yes', explain:	
Comments:	
Rating: This item is rated as 'Satisfactory'.	

Facility Site Review - No Exposure Certification (NEX)

Are any of the following materials or activities exposed to precipitation:	
1. Areas for storage, maintenance, washing, or use of industrial machinery or equipment?	Not Applicable
2. Materials or residuals from spills/leaks on the ground or in stormwater inlets?	Not Applicable
3. Materials or products from past industrial activities?	Not Applicable
4. Material handling equipment (except for adequately maintained vehicles)?	Not Applicable
5. Loading, unloading, or transportation of materials or products?	Not Applicable
6. Materials or products stored outdoors (except for final products intended to be used outside)?	Not Applicable
7. Materials contained in open, deteriorated, or leaking storage containers such as drums, barrels, or tanks?	Not Applicable
8. Materials or products that are handled/stored on road or rails owned/maintained by the facility?	Not Applicable
9. Waste materials (except for waste in covered, non-leaking containers (e.g., dumpsters))?	Not Applicable
10. Process wastewater application or disposal (unless otherwise permitted)?	Not Applicable
11. Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (e.g., under an air quality control permit) and evident in stormwater discharges?	Not Applicable
Comments: Facility does not have a No Exposure Certification, therefore this section does not apply.	
Rating: This item was not rated.	



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Facility Site Review - Multi-Sector Generic Permit (MSGP)

Have the provisions of the Stormwater Pollution Prevention Plan (SWPPP) been implemented?	Not Applicable
If 'Some' or 'None', explain what has not been implemented: The SWPPP was not available during or after the inspection,	
Is there a potential for the discharge of polluted stormwater from the site to a regulated receiving water or Municipal Separate Storm Sewer System (MS4)?	No
Are Best Management Practices appropriate for the activities occurring on site to protect regulated surface waters?	Yes

Best Management Practices (BMPs)

Area of Concern	Which BMPs are currently employed at the facility?	Are BMPs maintained consistent with the SWPPP?	Do BMPs appear sufficient to protect surface waters?
Vehicle / Equipment Wash and Rinse Areas	No washing occurs on-site (Jesus Lopez).	Not Applicable	Not Applicable
Fueling Areas	Five 5-gal. gas cans stored indoors (spill kits available).	Not Covered	Yes
Vehicle / Equipment Maintenance Areas	All vehicle maintenance occurs indoors on concrete w/ spill kits available.	Not Covered	Yes
Outdoor Manufacturing Areas	No outdoor manufacturing areas.	Not Applicable	Not Applicable
Outdoor Stockpile / Material Handling Areas	Vehicle engines are removed and drained, cars organized outside above soil.	Not Covered	Yes
Trash and Debris Areas	One 4-yd. dumpster w/ lid.	Not Covered	Yes
Loading / Unloading Transfer Areas	Transfer areas consist of pavement with overhead cover.	Not Covered	Yes
Illicit Connections to SW System (e.g., floor drains)	None found.	Not Applicable	Not Applicable
Chemical Storage Tanks (New and Used fluids)	Four 55-gal. drums w/ secondary containment for used oil (spill kits available).	Not Covered	Yes
Stormwater Treatment System	Sheet flow to C-7 canal.	Not Covered	Yes

Comments:

Rating: This item is rated as 'Marginal'.



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Plans/Monitoring - SWPPP

Has a SWPPP been prepared for the facility?	No
Is the SWPPP available for review at the time of inspection?	No
Does the SWPPP appear accurate and up-to-date?	Not Applicable
Does the SWPPP appear to meet the standards set forth in the MSGP (See the SWPPP Checklist for all applicable areas)?	Not Applicable
Are applicable records kept for three (3) years from the date of collection?	No
Comments: The SWPPP was not available for review during or after the inspection.	

Plans/Monitoring - Analytical Monitoring

Is the facility subject to analytical monitoring requirements?	Yes
If so, have the following conditions been met:	
- Has a monitoring schedule been identified?	Yes
- Has sampling been performed per the minimum requirements of the MSGP?	Yes
- Have the Discharge Monitoring Reports (DMRs) been submitted to the Department as required by the MSGP?	Yes
Has the facility reported any benchmark exceedances on DMRs submitted during the current permit cycle?	No
- If 'Yes', did the facility document a re-evaluation of the SWPPP measures and controls to address exceedances?	Not Applicable
- Have all noted updates to measures and controls been implemented at the facility?	Not Applicable
Note: Failure to amend and implement changes to the SWPPP as result of benchmark exceedance(s) constitutes a violation of Parts IV and IV.C. of the MSGP. Benchmark exceedance(s) may indicate a cause or contribution to water quality impairments.	
Comments: Sampling at the facility is not performed due to the claim of no discharge as reported in its DMRs.	

Plans/Monitoring - Compliance Monitoring

Is the facility subject to compliance monitoring requirements?	No	
If so, what frequency are the following activities conducted at the facility:		
Activity	Conducted	Frequency of Activity
- Wet Deck Storage	N/A	Not Applicable
- Phosphate Fertilizer Manufacturing	N/A	Not Applicable
- Asphalt Paving / Roofing Emulsions Production	N/A	Not Applicable
- Cement Manufacturing	N/A	Not Applicable
- Coal Pile Storage	N/A	Not Applicable
Are discharges sampled at least once per year and tested for the effluent limited parameters specified for the activities?	Not Applicable	
Are the discharge samples subject to the numeric effluent limitations prior to mixing with other discharges?	Not Applicable	
Have the compliance monitoring DMRs been submitted to the Department by the March 31st deadline, of the year following monitoring? (e.g., results are due by March 31, 2018 for a sample collected in 2017)	Not Applicable	
Comments:		



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Plans/Monitoring - Annual Comprehensive Site Compliance Evaluation (ACSCE)

Did the facility perform an ACSCE in the past 12 months?	No
Does the report contain the following:	
- Scope of the evaluation?	Not Covered
- Date of the evaluation?	Not Covered
- Any major observations relating to the implementation of the SWPPP?	Not Covered
Have the following conditions been met?	
- A determination of the effectiveness of the SWPPP?	No
- An assessment of compliance with the terms of the MSGP?	No
- A report documenting the results of the evaluation, and any required updates to the site / SWPPP?	No
Have the results of the ACSCEs been maintained for a minimum of three (3) years from the date of collection?	No
Comments: The ACSCEs have not been conducted for 2020-21.	

Plans/Monitoring - Quarterly Visual Monitoring (QVM)*

Has a schedule been identified to complete QVM?	No
Has the facility performed quarterly visual examinations of stormwater (more specifically, in the last 4 quarters)?	No
If so, have the following conditions been met?	
- Reports include observations of color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, or other obvious indicators of stormwater pollution?	Not Covered
- Reports include time, date, location, and name of personnel collecting the sample?	Not Covered
- Reports include probable sources of any observed indicators of stormwater pollution?	Not Covered
Have the results of the QVM been maintained for a minimum of three (3) years from the date of collection?	No
Comments: QVMs have not been conducted.	

**Sector S facilities do not have a QVM requirement, therefore this section does not apply to Sector S.*

Rating: This item is rated as 'Unsatisfactory'.



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Plans/Monitoring - Industrial SWPPP Checklist

Section	Yes / No	Comments
Is the SWPPP current and up-to-date?	No	The SWPPP was not available for review during or after the inspection.
Pollution Prevention Team	No	No SWPPP.
Description of Potential Pollutant Sources	No	No SWPPP.
Drainage	No	No SWPPP.
Inventory of Exposed Materials	No	No SWPPP.
Significant Spills and Leaks	No	No SWPPP.
Non-Stormwater Discharges	No	No SWPPP.
Sampling Data	No	No SWPPP.
Summary of Potential Pollutant Sources	No	No SWPPP.
Measures and Controls	No	No SWPPP.
Good Housekeeping	No	No SWPPP.
Preventative Maintenance	No	No SWPPP.
Spill Prevention and Response	No	No SWPPP.
Inspections	No	No SWPPP, QVMs were not reported for yrs. 2020-22 as well.
Employee Training	No	No SWPPP.
Record Keeping	No	No SWPPP.
Sediment and Erosion Control	No	No SWPPP.
Management of Runoff	No	No SWPPP.
Annual Comprehensive Site Compliance Evaluation	No	No SWPPP, ACSCEs were not conducted for 2020-21 as well.



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Inspection Rating Determination Form

Point Total:

Letter Type:

Letter to Send:

S = Satisfactory M = Marginal U = Unsatisfactory N = Not Evaluated

<input type="text" value="S"/>	Permit	Pts
S	Has a Permit or Exclusion from coverage, and NOI is located on site	1
M	Has applied for Permit or Exclusion from coverage, but it is not active	2
U	Has not obtained permit coverage, or does not qualify for a No Exposure Exclusion	10

<input type="text" value="S"/>	Condition of Receiving Waters	Pts
S	Receiving water is <i>not</i> impacted from the offsite discharge of polluted runoff	1
M	Receiving water is <i>moderately</i> impacted from the offsite discharge of polluted runoff	3
U	Receiving water is <i>significantly</i> impacted from the offsite discharge of polluted runoff	6
N	No inspection completed, or access to discharge areas was not able to be obtained	0

<input type="text" value="M"/>	Facility Site Review	Pts
S	Overall, the site poses little to no chance for the offsite discharge of polluted stormwater	1
M	Overall, the site poses a moderate chance for the offsite discharge of polluted stormwater	3
U	Overall, the site poses a significant chance for the offsite discharge of polluted stormwater	6
N	No inspection completed, or access to the facility was not able to be obtained	0

<input type="text" value="U"/>	Plans/Monitoring	Pts
S	SWPPP is complete. Required records are up to date and accurate	1
M	SWPPP is not more than 50% incomplete and/or not updated. Incomplete records, or inspections/reports are no more than 12 months past due	3
U	No SWPPP, or SWPPP is more than 50% incomplete. No records within the previous 12 month period	6
N	No permit, or a SWPPP is not required	0



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Single Event Violations

Check for Yes	Eval Area	Finding Code	SEV Code	Description
<input type="checkbox"/>	RRPT	STM2	D0N11	The facility was discharging without an industrial stormwater generic permit.
<input checked="" type="checkbox"/>	RRPT	STM3	B0N12	The facility failed to conduct inspections according to the industrial stormwater generic permit.
<input type="checkbox"/>	FACS	STM4	B0N18	The facility failed to implement the stormwater pollution prevention plan for the industrial stormwater generic permit.
<input checked="" type="checkbox"/>	RRPT	STM5	B0N41	The facility failed to maintain records for the industrial stormwater generic permit.
<input checked="" type="checkbox"/>	RRPT	STM6	C0N11	The facility failed to monitor according to the industrial stormwater generic permit.
<input checked="" type="checkbox"/>	RRPT	STM7	B0N17	The facility failed to develop any or an adequate stormwater pollution prevention plan for the industrial stormwater generic permit.
<input type="checkbox"/>	FACS	STM8	BN19A	The facility failed to properly install/implement best management practices.
<input type="checkbox"/>	FACS	STM9	BN19B	The facility failed to properly operate/maintain best management practices.
<input type="checkbox"/>	RRPT	STMA	E0N16	The facility failed to submit the required non-DMR report for the industrial stormwater generic permit.
<input type="checkbox"/>	RPPT	STMB	D0N18	The facility did not submit a Notice of Termination once all stormwater discharges associated with industrial activities had ceased.

Inspector Comments

Rationale for Letter:

The SWPPP, including QVM, and ACSCs were unavailable for review during the inspection. A Compliance Assistance Offer Letter(CAOL)should be sent.

Manager/Reviewer Comments

Concur with Recommendation?

☒ Yes

☐ No

Comments:

Concur with recommendation.

Inspector Signature

Manager/Reviewer Signature

Signed: Nov 29, 2022

FLR051461

Signed: Nov 29, 2022