# Auto Salvage Recyclers Environmental Self-Audit Workbook





Indiana Department of Environmental Management

## **Auto Salvage Recyclers**

#### **Environmental Self-Audit Workbook**



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www.idem.IN.gov/landquality/2465.htm

Updated January 2017

#### **ACKNOWLEDGEMENTS**

The Indiana Department of Environmental Management (IDEM) acknowledges the following organizations for their contributions to the development of this workbook.

- Indiana Auto Salvage Recycler's Association
- Pull-A-Part Used Auto Parts
- Summit, Inc.
- AutoZone
- Car X Muffler and Brakes
- Indiana State Department of Health
- Marion County Health Department
- Indiana Secretary of State Dealer/Special Sales Division
- U.S. Environmental Protection Agency (U.S. EPA)
- Indiana Department of Environmental Management
  - Office of Water Quality (OWQ) Wetlands and Storm Water
  - OWQ Drinking Water
  - OWQ Ground Water
  - Office of Air Quality Compliance
  - Office of Land Quality (OLQ) Emergency Response
  - OLQ Industrial Waste Compliance
  - Office of Program Support Assistance and Outreach Branch

#### Disclaimer:

The Indiana Department of Environmental Management does not endorse or recommend any product, company, or organization identified or depicted in this document.

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#### INTRODUCTION

The auto salvage recycling business sector is over seventy-five years old. It has evolved into a sophisticated, technology-driven operation that constantly changes in response to innovations in the automotive industry. To be competitive and profitable in today's markets, the auto salvage recycling process must involve more than merely crushing wrecked, abandoned, and worn-out motor vehicles. The modern-day auto salvage recycler needs established operating practices that realize the maximum market value of every end-of-life vehicle, as well as providing environmental protection within the community.

This workbook provides information that the auto salvage recycler needs in this modern age. Utilizing this information will help you better understand the environmental issues, comply with state and federal environmental regulations, and implement best management practices (BMPs) to minimize risks and liabilities. If you discover environmental violations at your business, this workbook can help you return to compliance without enforcement penalty.

Use of this workbook is voluntary. However, it will help you identify any issues and prepare your facility in the event of an inspection. You should keep copies of your checklists and any other forms you submit in order to assist you in demonstrating compliance with applicable state and federal regulations.

If you would like free, confidential, environmental assistance with your business, you can call IDEM's *Compliance and Technical Assistance Program* (CTAP). CTAP staff are available weekdays to answer your environmental questions regarding air, water, and waste regulations, pollution prevention, and recycling. You can call CTAP at (800) 988-7901 or (317) 232-8172.

#### **Clean Yard Program**

The Indiana Clean Yard program recognizes auto salvage recyclers who make sure that the environment and their communities are protected from pollution. There are two levels of recognition: Indiana Clean Yard, and Indiana Clean Yard Gold Level.

The first step to become an Indiana Clean Yard is for the owner or operator to conduct a self-audit of the facility using this workbook, and fix any issues found. Then, the owner or operator can submit the Auto Salvage Recyclers Certification Program Environmental Self-Audit Checklist and Certification Statement (both available on the www.in.gov/idem/5157. htm, IDEM Forms page). IDEM will review the forms and schedule a site visit to verify that your facility follows environmental regulations, has necessary licenses and approvals, and has an effective recycling program. If IDEM finds no issues during the review and site visit, we will present you with the Indiana Clean Yard Award. For more information about the Indiana Clean Yard Program, call IDEM at (317) 232-8172 or (317) 234-6951. You can also visit the IDEM Clean Yard Website at www.in.gov/idem/landquality/2470.htm.

#### **INSTRUCTIONS**

IDEM created this workbook to help you, the auto salvage recycler, understand the environmental regulations that apply to your business.

You can use this workbook to conduct an inspection of your facility and correct any potential violations that you find.

This workbook is divided into multiple sections labeled A through J and each section addresses a different compliance topic. For example, Section A: Auto Salvage License explains who needs to have an auto salvage license and what to do if you need a license.

There are two types of questions in this workbook. Questions followed by an explanation in an orange box like this:

The workbook sections also include information and resources to help you manage your business's environmental needs while utilizing best management practices (BMPs). Information placed in orange boxes similar to this refers to BMPs. While not required by regulation, BMPs will help you run your business in a more cost effective and environmentally-safe manner.

These questions are about best management practices (BMPs) which are voluntary. All other questions are about regulations; these regulations are mandatory and must be followed. For example, see question 1 in A: Auto Salvage License.

We also created the Auto Salvage Recyclers Certification Program Environmental Self-Audit Checklist form (SF 53765) to help document and evaluate your compliance. This form can be found at http://www.in.gov/idem/5157.htm. You do not need to mail this form to IDEM unless you plan on becoming an Indiana Clean Yard.

If you have questions about this workbook, contact IDEM's Industrial Waste Compliance Section at (800) 451-6027 or (317) 234-6951.

#### **A: AUTO SALVAGE LICENSE**



An auto salvage recycler facility.

A copy of the license application form can be found at www.idem. IN.gov/sos/dealer/2383.htm

170 Tage	Indiana Secretary of State Salvage Motor V	ehicle Busine	ss License			
	THIS LICENSE MUST BE DISPLAYED CONSPICUOUSLY. THIS LICENSE IS NOT TRANSFERRABLE THIS LICENSE IS VOID IF ALTERED					
This lice	This license named below is authorized to engage in the business activity indicated by the license type at the location listed below:					
LICENSE T	YPE	ISSUE DATE				
SALVAGE						
FUNCTIONS						
	RECYCLE USED PARTS DLR					
DEALER NA	AME AND ADDRESS	EXP DATE				
		COUNTY				
OWNER NA	ME	DEALER#	LICENSE FEE			
		SIGNATURE OF	SECRETARY OF STATE			

Sample salvage motor vehicle business license

In addition to following environmental regulations, you also need to make sure that your salvage recycling yard is licensed by the Indiana Bureau of Motor Vehicles.

#### Do you have a valid Indiana Automotive Salvage Recycler Business License?

A license is required for disposal facilities, used parts dealers, or automotive salvage rebuilders that do any of the following activities:

- Sell a used major component part of a vehicle;
- Wreck or dismantle a vehicle for resale of the major component parts of the vehicle;
- Rebuild a wrecked vehicle or dismantled vehicle;
- Possess more than two (2) inoperable vehicles subject to registration for more than 30 days; and,
- Engage in the business of storing, disposing, salvaging, or recycling of vehicles, vehicle hulks, or the parts of vehicles.

If you do not have a valid (i.e., current) Indiana Salvage Recycler Business License, you will need to get one. To be in compliance, you will need to complete the license application form and submit the form with the application fee to:

Secretary of State of Indiana Dealer Division 302 W. Washington Street, Room E018 Indianapolis, Indiana 46204

#### **B: FLUIDS MANAGEMENT**

As the operator of an auto salvage recycling business, you work with numerous types of fluids, and you need to be aware that many of them can pose a threat to human health and the environment if not handled correctly. Fluids are generally best managed by starting the fluids management process as soon as you receive a vehicle and diligently following through with all of the recommendations you will find here. This section will explain some requirements and suggestions for helping manage your fluids in the best way possible.

### Do you have spills or releases of fluids at your facility?

Fluids can include gasoline, fuel, motor oil, antifreeze, transmission fluid, brake fluid, battery acid, power steering fluid, crank case oil, solvents, paints, etc.

To be in compliance, you will need to immediately clean-up, remove, and contain all spills and contaminated soil/debris resulting from spills and releases.

If the visible contamination is less than twelve (12) inches below the ground surface, then remove at least six (6) inches of soil/debris below the visible contamination. Dispose of all waste and contaminated soil/debris in a state permitted municipal solid waste landfill. Submit to IDEM, documentation of proper disposal of the remediated waste, as well as, plans to prevent future contamination (e.g., photos, receipts). Be aware that if the spilled material is unknown, you will need to conduct a waste determination prior to disposal of your contaminated material. See the orange box at the right for guidance information.

If the visible contamination is greater than twelve (12) inches below the ground surface, notify IDEM to determine the necessary clean-up requirements. Call IDEM's *Office of Land Quality* — *Industrial Waste Section* at (800) 451-6027 or (317) 234-6951.



Fluid pooling beneath stored vehicles.



Release of fluids from above ground storage tanks in poor condition with no label.

#### For guidance in making a waste determination, visit

- www.idem.IN.gov//landquality/ files/hw\_waste\_info\_determination\_ process.pdf
- www.idem.IN.gov/ctap or call IDEM toll free at (800) 988-7901 or (317) 232-8172.



Removal of fluids prior to storing the vehicle.



Oil removed and drained from oil filters.



Fluid removal prior to storing cars in the yard can greatly reduce fluids releases to ground and storm water.



Some fluids can be recycled or reused after removal.

## If you answered "YES" to the question above, did you report the spill(s) and release(s) to IDEM upon discovery?

In the future, you will need to call IDEM's *Office* of Land Quality – Emergency Response Section at (888) 233-7745 or (317) 234-4112 to report any spill or release.

#### Do you remove fluids and filters from vehicles prior to storing them in your yard?

It is recommended that you remove all fluids and filters from vehicles before you store them in the yard. Removing these helps prevent potential health and environmental hazards. Used automotive fluids can contain contaminants, such as solvents, which can cause negative health effects as mild as nausea or as severe as life-threatening organ damage. Even clean, new fluids can pose a health risk: gasoline contains benzene, a chemical known to cause cancer. Additionally, removing the fluids and filters allows you to recycle them.

### Do you remove batteries from vehicles prior to storing them in your yard?

It is suggested that you remove batteries from vehicles prior to storing the vehicles in your yard, since they contain harmful substances such as lead, zinc, mercury, nickel, cadmium, and strong acids. A substance with the corrosive ability of a strong acid or the toxic potentials of lead, zinc, mercury, nickel, and cadmium should not be released to the environment. By removing batteries, you help ensure that these contaminants stay out of our soil, water and air.

# Do you store vehicle batteries in a building or away from the elements (e.g., rain and snow) to prevent a release into the environment?

Once you have taken the first step of removing batteries, the next thing to do is store them properly. The best possible way to store batteries is in containers or structures that can catch any leaks. These containers or structures are also known as secondary containment units. Containers should then be kept inside a building. By following this suggestion, you decrease the likelihood that contaminants (acid, lead, etc.) from the batteries will leak onto the ground or be washed into waterways by rain or snow. Storing batteries in secondary containment inside a building also helps lessen the chances of a potentially costly clean-up in the event of an accidental release.



Proper battery storage inside a trailer.



Proper battery storage inside a building in secondary containment.



Batteries stored inside with secondary containment.



Auto recycler crushing operation.



Crusher placed in secondary containment.



Windshield wiper fluid storage.

## Do you crush vehicles on site? This applies to a crusher that is owned or

contracted by the facility to do work on site. *If "NO", skip question 5a.* 

# If you answered "YES" to the question above, is the crusher located in an impervious secondary containment unit or inside a building with concrete floors?

After you have removed all automotive fluids, residual fluids will undoubtedly remain. In order to decrease the chance that these fluids will spill onto the ground during crushing and contaminate the environment, you should consider placing the crusher in an impervious secondary containment unit or inside a building with impervious concrete floors.

### Do you remove and recycle windshield wiper fluid?

Most people are familiar with the idea that gasoline and oils can cause health and environmental damage. However, many people do not realize that windshield wiper fluid, because of constituents like ethylene glycol, can also negatively impact human health and the environment. By removing windshield wiper fluid, you will be helping to ensure this contaminant does not reach the environment, and possibly save money.

### Do you inspect all fluid containers weekly for rust, dents, holes, bulges and leaks?

You should inspect all your fluid containers on a weekly basis for rust, dents, holes, bulges and leaks. By doing this, you will notice any problems and therefore decrease the possibility of an accidental release which could cause damage to the environment or loss of recyclable materials.

### Do all of your fluid containers have secure (tightly-sealed) lids?

You should secure the lids on all of your fluid containers. Following this suggestion will lessen the chances that contaminants will reach the environment through evaporation or accidental spills. This will also help prevent contamination of your usable fluids.



Drums that are rusted and dented.



Properly closed parts washer



Properly closed parts washer.



Properly labeled and stored antifreeze.



Properly labeled and stored fluids.



Properly labeled and stored fluids in stationary secondary containment.

### Do you label all of your fluid containers to identify the contents?

Labeling all of your fluid containers is an easy suggestion to follow. This will help prevent accidental mixing of incompatible substances. Also, it is much easier for you to know how to react to a spill if you know what fluid has spilled. This also helps when emergency responders need to come to your facility regarding a spill. Labeling fluids can also help with recycling and avoid the potential costs of a waste determination, a procedure that sometimes must be done in order to determine the identity of an unknown material.

## Do you store your fluid containers in a building or away from the elements (e.g., rain and snow) to prevent releases to the environment?

Storing fluid containers in a building or away from the elements is another suggestion you can follow to help ensure that fluids do not reach the environment. You can also add secondary containment pads for increased protection. These measures will help lessen the chances of a potentially costly clean-up in the event of an accidental release.

## Do you store empty drums in a manner that prevents the accumulation of rain water?

Keep empty drums in a manner that prevents the accumulation of water. For example, you can store them capped and laid on their sides. This will help prevent the accumulation of stagnant water, which could serve as a mosquito breeding ground. This also helps ensure that no water will come into contact with residual fluids and wash them into the soil or water.

# Do you store engines, transmissions, and other vehicle parts in a building or away from the elements (e.g., rain and snow) to prevent releases to the environment?

Store vehicle parts inside a building. By storing them outside, you risk potential contamination if residual fluids leak out, or if precipitation washes the fluids into the environment. Inside storage will lessen the chances of contamination, and your parts will be protected from damage by the elements.

### Are your floor drains closed or filled in where fluids are present?

If you have floor drains in an area where fluids are present, we suggest that you close or fill in the drains. By doing so, you make clean-up easier and you help ensure that your fluids will not find their way into the soil or water if they happen to spill on your floor.



Open containers collecting rainwater.



Drums capped and stored on their sides.



Parts stored in racks inside building.



Filled in floor drain.

#### C: OIL



Improperly stored used oil.



Labeled drum of used oil.



Used oil label.

Oil, especially used oil, has the potential to cause pollution and other negative effects if handled incorrectly. Used oil is also one of the most common waste fluids you generate at your facility. Because salvage yards so commonly deal with this fluid, the importance of following all applicable regulations can sometimes get lost in the shuffle of everyday business. This section will help you understand some of the most common regulations that apply to storage, use and disposal of used oil.

#### Are your oil containers and/or tanks in good condition?

Good condition is free from rust, dents, holes, bulges and leaks. Inspect all used oil storage containers and/ or tanks at your facility. To be in compliance, you will need to immediately replace/repair any damaged containers and/or tanks. Dispose of deteriorated containers at an approved disposal or recycling facility, as appropriate. Maintain containers and/or tanks in good condition.

### Do you label used oil containers and/or tanks with the words "Used Oil"?

All containers and/or tanks that store used oil must be labeled clearly with the words "Used Oil". No other phrases are acceptable. If your containers and/or tanks are not labeled with the words "Used Oil", you will need to label them. In addition to tanks and containers, label any fill ports if the fill ports are not directly associated with the containers and/or tanks.

An example of this is when a container and/or tank is outside the building and the fill port (commonly a sink or pump) is located inside the building. To be in compliance, you will need to label (e.g., via stickers, paint, marker, stenciling) all of your used oil containers and/or tanks with the words "Used Oil"

#### Do you burn used oil in a space heater? If "NO", skip question 3a.

The use of an oil-fired space heater is permitted provided that the heater has a maximum capacity of no more than a half (0.5) million BTUs/hour and that the combustion gases from the heater are vented to the ambient air.



#### Do you burn used oil generated only by your facility or by a household do-it-yourselfer?

If you burn oil generated by another facility (except for household do-it-yourselfers), you will need to immediately cease the use/acceptance of used oil generated at other locations.

If you would like to continue to use/accept used oil generated by another location, you must comply with 329 IAC 13-4-1 requirements for used oil marketers.



Used oil storage tank in secondary containment.



Space heater with labeled used oil storage tank.

If you have any questions about the rule for burning used oil, please contact IDEM's Office of Land Quality toll free at (800) 451-6027 ext. 234-6935.



Registered used oil transporter.



Drum transported in a truck bed.

### Do you use a registered transporter for your shipments of used oil?

If "YES", skip question 4a.

You can find a list of registered used oil handlers atwww.idem.IN.gov/landquality/2371.htm

- Do you transport used oil (fifty-five (55) gallons or less) in a company (or employee) vehicle to one of the following locations:
  - a government approved collection center; or,
  - an aggregation point owned or operated by your company?

OR

#### Do you have a contract that requires your used oil to be returned to you for re-use?

You may self-transport fifty-five (55) gallons or less of used oil if you take it to an approved collection center or company owned aggregation point. If you do not take your oil to an approved location or have an approved contract, you will need to immediately contract the services of a registered transporter and maintain records of shipments or you may self-transport to an approved location.

# Do you have a total on site storage capacity for oil and other petroleum products that exceeds one thousand three hundred and twenty (1320) gallons?

Capacity equals the amount the containers and tanks can hold, NOT the amount of oil and other petroleum products you currently have.

If "NO", skip question 5a.

Calculate the oil and other petroleum products storage capacity you have on site. This will include all oil and other petroleum products, both new and used. The only containers that you will need to count are those above ground with a capacity to hold fifty-five (55) gallons or more. If the total capacity is less than one thousand three hundred and twenty (1320) gallons, *answer NO and skip question 5a*.

## Does your facility have a Spill Prevention, Control, and Countermeasure (SPCC) Plan?

If your facility does not have an SPCC Plan, you will need to develop an SPCC Plan. Or, you may reduce the total on site oil and other petroleum product capacity at your facility.

For more information on developing an SPCC plan, visit **www.epa.gov/oem/content/spcc/index.htm** or call the U.S. EPA at (312) 866-9497.



Oil storage capacity exceeding 1320 gallons.



Oil storage capacity exceeding 1320 gallons.



Sample spill prevention control and countermeasures plan cover page.

#### D: UNDERGROUND STORAGE TANKS



Remnants of a dispenser pad for a UST.



Vent lines for a UST.



Fill pad for a UST.

For a registration application, visit www.idem.IN.gov/
5157.htm#olq\_auto

The presence of an underground storage tank (UST), whether in use or out of service, could mean that your facility is subject to additional regulations. It's possible that you have an underground storage tank, but are not aware of it. If you have items resembling those depicted to the left, you will need to examine them further to determine if you do have a UST.

**Does your facility have any USTs?** *If "NO", skip question la.* 

Do you have petroleum or hazardous substance-containing UST(s) (one hundred ten (110) gallons or more) that have not been registered with IDEM?

Note: USTs storing fuel for heating are exempt.

If you have a UST(s) that has not been registered with IDEM, you will need to contact IDEM's Office of Land Quality — Underground Storage Tank Section toll free at (800) 451-6027 ext. 234-0343 to register or close your tank.

#### **E: HAZARDOUS WASTE MANAGEMENT**

Some small businesses, including salvage yards, are hazardous waste generators. Even if you only generate a small amount of hazardous waste, it's still important to handle the waste properly. Some of the items that an auto salvage business may have that could be considered hazardous waste are: solvents, paints, aerosol cans, rags contaminated with solvents or paints, lead acid batteries, and fluorescent lights.

#### Does your facility have any unknown materials on site?

If you have unknown materials, you will need to identify (e.g., conduct a waste determination) the unknown materials and determine if they are hazardous.

## Do you generate hazardous waste in quantities greater than or equal to two hundred twenty (220) pounds per month?

If you generate hazardous waste in quantities greater than or equal to two hundred twenty (220) pounds per month, you will need to contact IDEM's *Office of Land Quality* — *Hazardous Waste Section* toll free at (800) 451-6027 or (317) 234-6951 to obtain a U.S. EPA ID number and for further guidance on how to properly manage the waste.



Unlabeled group of drums with unknown contents.



A half full 55 gallon drum is about 220 pounds.

#### For guidance in making a waste determination, visit

- www.idem.IN.gov/landquality/ files/hw\_waste\_info\_determination\_ process.pdf
- www.idem.IN.gov/ctap

or call IDEM toll free at (800) 988-7901 or (317) 232-8172.

#### F: WASTE TIRE MANAGEMENT



2/32 inch tread depth test with a penny.



Sample waste tire storage registration.

Waste tires can pose a fire hazard and provide breeding grounds for rodents and mosquitoes. In order to reduce these potential hazards, it's important for you to comply with Indiana's waste tire regulations. The information below can help you determine what problems you may have and also provide you with information on how to remedy some of those problems.

## Does your facility have over 1,000 waste tires stored outside or over 2,000 waste tires stored inside?

If "NO", skip question la.

A waste tire is a tire that is not suitable for the tire's original purpose. A tire with less than two-thirty seconds (2/32") of an inch tread is considered to be a waste tire. To test tread depth, place a penny into several tread grooves across the tire. If part of Lincoln's head is always covered by the tread, you have more than two-thirty seconds (2/32") of an inch of tread depth remaining.

## Does your facility have a valid certificate of registration as a waste tire storage facility?

If your facility does not have a valid waste tire storage registration, you will need to obtain one.

### Do you open dump waste tires at your facility?

If you have uncovered and/or unaltered waste tires kept outside, you likely have an open dump, and will need to collect and remove all waste tires presently on site and haul them to a state approved waste tire management facility. Be advised that IC 13-20-14-1 prohibits the disposal of whole waste tires at Indiana solid waste landfills. The Indiana Air Pollution Control Rule prohibits the open burning of this waste. Or you may keep waste tires in an enclosed area or covered container until you dispose of the waste tires.

### Do you store waste tires in a manner that poses a fire hazard?

If you store your waste tires in a manner that poses a fire hazard (e.g., near heat sources and activities like welding, torching, smoking or under power lines) you will need to change this practice. To be in compliance, you will need to store waste tires away from potential fire hazards.



Open dump of tires.



Tire fire due to storing tires in an unsafe manner.

For more information on storing tires in a manner that does not pose a fire hazard, you can contact the Indiana State Fire Marshal at (317) 232-2222.



Tires stored improperly in standing water.



Mosquito larvae in tire. (Marion County Department of Health)



Mosquito larvae. (Indiana State Department of Health)

#### Do you prevent water from accumulating in the waste tires?

Water accumulation in waste tires is not allowed.

If you do not prevent water from accumulating in your waste tires, you will need to do so by cutting or drilling holes, and/or by storing in a building, under a tarp, in an enclosed area or in a covered container.

## Do your waste tires have the potential to harbor vectors that pose a threat to human health?

A vector is a mosquito or other animal that can carry disease to humans.

If your waste tires have the potential to harbor vectors, you will need to manage waste tires in a manner that minimizes vector attractions by cutting tires, drilling holes in tires, storing tires in a building, and/or storing tires in enclosed areas or covered containers. In extreme cases, you will also need to ensure removal of vectors (e.g., spraying for mosquitoes).

- **Do you ship whole waste tires off-site?** *If "NO", skip question 7.*
- Are your tires delivered to one or more of the approved locations:
  - **a** wholesaler or agent of a wholesaler;
  - a facility that manufactures or retreads tires;
  - a permitted final disposal facility regulated under environmental management laws;
  - a permitted waste tire storage site;
  - a permitted waste tire processor; or
  - a registered waste tire transporter.

If your tires are not taken to an approved location, you will need to immediately cease transport to all unapproved facilities. Begin transporting all whole waste tires to an approved facility. Keep proof of transport to an approved facility (e.g., receipts, contract).



Shredded waste tires.



Open dump of tires.

For a list of registered transporters, processors, or storage sites, please visit

- www.idem.IN.gov/wastetire/files/ wt\_processors\_and\_storage.pdf,
- www.idem.IN.gov/wastetire/files/ wt\_transporters.pdf

#### **G: MERCURY SWITCHES**



Mercury is contained within the gold-colored pellet near the right end of this mercury switch housing.



ELVS bucket properly labeled with the universal waste label.

For more information on the ELVS program, visit www.elvsolutions.org

Mercury switches are found in the hood and trunk lights of some vehicles. When cars containing these switches are crushed or when the metal is remelted, the mercury can be released into the environment, potentially contaminating the air and water. In order to help protect human health and the environment from the effects of mercury, you are required to remove mercury switches from your scrap vehicles.

Indiana currently pays auto salvage recyclers \$3 for each mercury switch and \$5 for each ABS sensor. To find out how to collect your bounty, call IDEM at (800) 451-6027, ext. 2-8172 or (317) 232-8172 or see the Indiana Archives and Records Administration and search for State Form 53238. In order to collect a bounty you must participate in the End of Life Vehicle Solutions (ELVS) program. All auto salvage yards can obtain a mercury switch recycling container/bucket and additional materials from the ELVS program. To obtain the container, please contact the ELVS program or IDEM.

Many steel mills are now required to ensure that the scrap they purchase is free of mercury switches. One steel mill in Indiana has made it a part of their scrap management plan to only buy from auto salvagers who are listed in the ELVS database as switch recyclers.

## Do you receive vehicles that contain mercury switches at your facility?

For a list of vehicles that contain mercury switches, see www.elvsolutions.org/?page\_id=542

*If "NO", skip to the next section H - Solid Waste.* 

### Do you remove mercury switches from vehicles at your facility?

Indiana law requires each motor vehicle recycler to remove all mercury switches from each vehicle when it is received. If you do not remove mercury switches at your facility, to be in compliance you will need to obtain an ELVS bucket and remove mercury switches from all vehicles. See below for additional information.

# Do you use an appropriate container to store mercury switches and/or ABS G-force sensors that contain mercury switches?

An appropriate container is a container that meets the universal waste regulations for transportation (e.g., a bucket provided by ELVS.)

If you do not store mercury switches in an appropriate container such as the plastic bucket provided by ELVS, you will need to obtain an ELVS bucket and store all mercury switches in that container (a maximum of four hundred fifty (450) switches per bucket). Place the plastic liner included with the bucket inside the bucket and place all switches in the liner. Ensure that the container is labeled with the universal waste sticker (completely filled out). After the bucket is filled, you can use the pre-paid shipping label and return the full bucket to ELVS. Before you ship your bucket, make sure to request a new one from ELVS.

The ELVS bucket includes educational materials and a DVD that show you which vehicles have mercury switches and how to properly remove, store and ship them. It also contains a universal waste label that must be placed on the bucket, a plastic liner that must be placed in the bucket, and a mailing label that you must use to ship the bucket to the mercury recycler. Keep the cardboard box you received the bucket in. You will need to ship the bucket in the box.



Removal of mercury switches is required by Indiana law.



Improper mercury switch storage.

To obtain a bucket for mercury switches, contact ELVS at www.elvsolutions.org/?page\_id=13 using the form provided.

If you have questions, call IDEM at (800) 451-6027, ext. 2-8172 or (317) 232-8172.



**ELVS** universal waste bucket.



Correct way to fill out a label for mercury switches.

## Are the containers in good condition and kept closed unless adding or removing mercury switches?

To be in compliance, you will need to store your containers closed and maintain the containers in good condition (e.g., no cracks or holes).

#### Do you mark the containers as universal waste?

We recommend that you use the ELVS-supplied label; however, you can use an appropriate label for mercury switches that have the words "Universal Waste" and one of the following three (3) descriptions to describe the switches: "Mercury-Containing Equipment", "Waste Mercury-Containing Equipment", or "Used Mercury-Containing Equipment".

To be in compliance, you will need to label your container (e.g., use the pre-printed label provided in the ELVS bucket). Ensure that the label is completely filled out with the accumulation start date and shipper information.

#### 6

## Have any containers of mercury switches been accumulating on site for more than one year?

Containers shall be labeled with the accumulation start date.

Mercury switches and other universal waste may only be stored on site for a maximum of one year. If you have a container of mercury switches that has been on site for more than one year, immediately send mercury off site for proper disposal (we recommend using the ELVS program which includes a shipping box, a plastic bucket, and a pre-paid shipping label). In the future ensure you ship mercury switches off before the one year time limit.



#### Do you maintain records of mercury switch removals?

Indiana law requires you to maintain records that document the number of vehicles processed at your facility, the number of vehicles that contained switches, and the total number or switches collected. You must keep those records for at least three years. If you do not maintain records for mercury switch removal, immediately begin doing so.



Removal of a light containing a mercury switch.



Mercury spill kit.

A mercury spill kit typically includes safety glasses, disposable gloves, mercury absorbing sponges, and mercury absorbing powder.

# Does your facility use appropriate safety procedures and have emergency equipment available in the areas where you handle mercury switches?

These procedures can include handling mercury in a well-ventilated area, and using containment devices. You must have a mercury spill kit in the area where you handle mercury switches.

# Have you trained your employees on appropriate safety and emergency procedures for removing and handling mercury switches?

These procedures can include handling mercury in a well-ventilated area and using containment devices. You must have a mercury spill kit in the area where you handle mercury switches.

If you have not trained your employees on appropriate safety and emergency procedures for removing and handling mercury switches, you should do so immediately and keep documentation of training. For an example of a training log, see Appendix: Annual Mercury Safety Training of this guide.

#### **H: SOLID WASTE MANAGEMENT**

Solid wastes generated by auto salvage recyclers can include garbage, refuse, or other discarded material resulting from industrial or commercial operations. Nearly any item at your facility that is no longer in use or usable can be considered waste. Therefore, it's very important for you to maintain your business in a way that does not allow for the excessive accumulation or mismanagement of solid waste.

#### 1

### Do you open dump materials at your facility?

An open dump is any waste that is not properly containerized, and is instead scattered and piled upon the ground. Solid waste materials can include garbage, refuse, construction debris, tires, ash piles, contaminated soils, household waste, shredder fluff, discarded auto parts or other similar items.

#### Open dumping of materials is prohibited by state law!

If you open dump immediately remove any solid waste from the facility and take it to a state-approved solid waste management facility or recycling facility. IDEM recommends that you keep documentation of solid waste removal. In the future, place all solid waste in a container (e.g., dumpster, trash can, roll-off) for proper management and disposal.



Illegal open dumping of solid waste.



Illegal open dumping of solid waste.



Proper solid waste disposal container.



Brake pad removal.



Non-deployed airbag removal.

For information on the health effects of sodium azide, visit the Centers for Disease Control Web Site at www.emergency.cdc.gov/agent/sodiumazide/basics/facts.asp

## Do you remove brake or clutch pads from vehicles at your facility?

If "NO", skip question 2a.

#### Do you take measures to eliminate asbestos exposure?

If you remove materials containing asbestos, you need to take proper precautions to reduce exposure due to the health hazards associated with asbestos. Measures that can be taken include using respiratory and eye protection, and using the wet wipe method. The wet wipe method involves using a spray bottle or other device capable of delivering a fine mist of water at low pressure to wet all brake and clutch parts. The brakes/clutches can then be wiped clean with a cloth. It is recommended that the used cloths and other asbestos waste be collected and disposed of in sealed, impermeable containers that are labeled with the following information: "DANGER. CONTAINS ASBESTOS FIBERS. AVOID CREATING DUST. CANCER AND LUNG DISEASE HAZARD.

## **Do you remove air bags at your facility?** *If "NO", skip question 3a.*

### Do you take measures to safely remove non-deployed air bags?

If you remove air bags, you should take measures to ensure safety due to the health hazards associated with the sodium azide in air bags. Safety measures include using respiratory, eye, and skin protection when removing air bags; placing the air bags in a container away from sunlight; and, sending the air bags for recycling.

#### I: AIR

The air can be impacted in many ways by your business. Solvents you use could evaporate into the air; refrigerants can be released into the air; dust can be generated and swept into the air; and smoke can carry any number of contaminants. This section will guide you through an examination of some potential sources of air pollution at your facility.

## Do you open burn any materials on your property?

"Open burning" is the burning of any materials whereby air contaminants resulting from combustion are emitted directly into the air, without passing through a stack or chimney from an enclosed chamber.

**Open burning is prohibited!** If you open burn any materials, you will need to immediately stop. Clean the burn area and remove any solid waste and ash to a state-approved solid waste management facility or recycling facility, as appropriate.

For more information about open burning, visit the IDEM web site at www.idem.IN.gov/airquality/2411.htm.

## Do you use solvent(s) (cleaners/degreasers) at your facility?

If "NO", skip question 2a.

There are many types of commercial solvents available for cleaning grease, oil and dirt from engines and parts. Gasoline, brake cleaner, and paint thinner can be considered solvents. Know what types of solvents you have at your facility and maintain a Material Safety Data Sheet (MSDS) for each solvent.



Illegal open burning.



Illegal open burning in a barrel.



Common solvents.



Properly closed parts washer.



Construction generated dust crossing property lines.

For further information on solvents, call IDEM's Office of Air Quality at (800) 451-6027, ext. 3-0178 or (317) 233-0178 or visit www.idem.IN.gov/airquality/2411.htm

## Do you store your solvent(s) in a closed container(s) when not in use?

A solvent container can be a parts washer (degreaser). Examine all solvent containers (including parts washers) to ensure all lids are tightly sealed.

## Do you generate any particulate matter (e.g., dust, smoke, etc.) that crosses the property line?

Examine your property for signs that particulate matter (dust or smoke) is visibly crossing your property line at or near ground level. The following activities/ areas may create particulate matter that can cross the property lines:

- torching;
- welding;
- driving on gravel or dirt parking areas or roadways; and,
- moving equipment and inventory around your property.

If there is visible particulate matter crossing the property line, contact IDEM's *Office of Air Quality* for guidance on how to prevent fugitive dust and emission violations. IDEM's *Air Compliance Section* can be reached at (800) 451-6027 ext. 3-0178 or (317) 233-0178.

Information is also available on the IDEM Web site at www.idem.IN.gov/airquality/2411.htm.

#### 4

#### Do you use a sweat furnace at your facility?

A sweat furnace is used to melt mixed aluminum scrap into more uniform, saleable ingots or sows.

If your facility uses a non-permitted sweat furnace, you will need to contact IDEM's *Office of Air Quality (OAQ)* for guidance on how to obtain a permit and comply with the appropriate emission limits, performance testing, and operating and monitoring requirements.

For information concerning the requirements for sweat furnaces, contact IDEM at (800) 451-6027, ext. 3-0178 or (317) 233-0178.

For the U.S. EPA's *New Regulations Controlling Emissions* from Sweat Furnace Operations, visit www.nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=000037AN.pdf.



# Do you keep records documenting the appropriate removal of refrigerants from vehicles, appliances (e.g., refrigerators and air conditioners), or other equipment?

Ensure that records are maintained for every vehicle going for final disposal (e.g., crushing, scrapping). If you do not have records documenting the appropriate removal of refrigerants from the vehicles at your facility, you will need to start keeping records with the following information for every vehicle brought to your site:

- 1. a signed statement that refrigerants have been legally removed; and
- 2. the name and address of the person recovering the refrigerant; and
- 3. the date the refrigerant was removed; or,
- 4. a contract that the refrigerant will be removed.

You will need to keep these records and make them available to IDEM upon request. For an example of a refrigerant removal tracking form see *Appendix: Refrigerant Tracking Logs*.



Sweat furnace.

Refrigerant Removal Records									
I hereby certify that the refr on this page.	igerants have	e been leg	ally remov	ed from	the vehicles listed				
Facility Owner: Sign		Prin	t		Date				
All refrigerants were remov	ed at the foll	owing lo	eation:						
Refrigerant Recovered By	Date Removed	Make	Model	Year	VIN				
<u> </u>									

**Example of refrigerant removal form.** 

For more information
on regulations that are
applicable to refrigerants,
visit the U.S. EPA's web site at
www.epa.gov/sites/production/
files/2015-08/documents/section\_
609\_of\_the\_clean\_air\_act\_motor\_
vehicle\_air\_conditioning.pdf



Refrigerant recovery device.

For a list of equipment that can be certified, visit https://www.epa.gov/mvac/section-609-certified-equipment

For a copy of the form, visit https://www.epa.gov/sites/production/files/2016-03/documents/recoveryform.pdf

### Do you collect refrigerants in U.S. EPA - approved devices?

All refrigerants must be collected in U.S. EPA-approved devices. An approved device must be certified. Certification requires a statement signed by the owner of the equipment or another responsible person and must include:

- the name and address of the purchaser of the equipment, including the county name;
- where each piece of equipment is or will be located;
- the number of service trucks (or other vehicles) used to transport technicians and equipment between the establishment and job sites and the field;
- the manufacturer name, the date of manufacture, and if applicable, the model and serial number of the equipment; and,
- a statement that the equipment will be properly used in servicing or disposing of appliances and that the information given is true and correct.

Owners or lessees of recycling or recovery equipment having their places of business in Indiana must send their certifications to:

> CAA section 608 Enforcement Contact EPA Region V (AE17J) 77 West Jackson Blvd. Chicago, IL 60604-3507.

If you have not certified your equipment you will need to do so immediately.

## 7 Do you release refrigerants into the atmosphere?

Refrigerants cannot be released into the atmosphere. Do not cut or puncture refrigerant lines. If you are releasing refrigerants you will need to stop immediately and ensure that all refrigerants are collected and contained in a U.S. EPA-approved device.

# Are refrigerants removed from vehicles prior to storing them in the yard?

You should remove all refrigerants from all vehicles (non-drivable) prior to storing them in the yard. Removing refrigerants prior to storing them in the yard will reduce the chance for an accidental release to the environment as vehicles age in your yard.

# Are employees trained to remove and capture refrigerants?

Ensure that all employees who deal with refrigerants at your facility receive training to remove and capture refrigerants. Proper training of employees will reduce the chance for accidental refrigerant releases in the environment.

# Are all air conditioner openings sealed after evacuation to prevent leaking of residual refrigerant?

Ensure that all air conditioner openings are sealed after evacuation. Sealing the air conditioner openings will reduce small releases into the environment.

# Are all collection/storage devices inspected to ensure they are not overfilled?

Initiate an inspection program to ensure that all your refrigerant storage devices are not overfilled. An inspection program will reduce the chances of accidental releases into the environment.



Refrigerant removal.

For information on training and certification programs, visit https://www.epa.gov/mvac/section-609-technician-training-and-certification-programs.

#### J: WATER



Environmental contamination from leaking crushed vehicles.



Construction activity exceeding one acre.

For additional information about land disturbing activities, visit the storm water permits web site at www.idem.IN.gov/stormwater/2331.htm
or contact IDEM's OWQ Wetlands and Storm Water Section at (800) 451-6027 or (317) 234-3980.

All salvage operations need to be aware of their potential impact on storm water and how to decrease any negative impacts they may be having. Because many items at an auto salvage business are stored outside without cover, it is important to practice "good housekeeping measures". These measures can help reduce or eliminate the exposure of contaminants released by activities such as fluids removal, dismantling, crushing, and shredding, to rain and snow. This section will cover the most pertinent water issues that businesses in the auto salvage sector encounter.

# Are there any existing or planned land disturbing activities greater than one (1) acre at your facility?

If "NO", skip question 1a.

Land disturbing activities include any man-made change of the land surface, including purposefully removing vegetative cover, excavating, grading, filling, and construction activity that will expose the soil surface.

Consider your present and future activities; if your plans include any land disturbing activities as described above, circle yes. If you are not sure if your activities qualify, contact IDEM's *Office of Water Quality (OWQ)* — *Wetlands & Storm Water Section* at (800) 451-6027 or (317) 234-3980.

IDEM can assist you in determining if your construction activity jurisdiction of either a storm water conservation district (SWCD) or municipal separate storm sewer system (MS4) at the local level.

#### Does your facility have a permit for land disturbing activities as referenced under 327 IAC 15-5?

If you are conducting or planning land disturbing activities greater than one (1) acre, have you contacted IDEM and received a permit for those activities? If the answer is "NO", then you will need to do so immediately.

Before you begin land disturbing activities, you need to obtain a valid permit under 327 IAC 15-5. To obtain a permit:

- 1. develop a construction plan to address erosion, and sedimentation and pollutants that will be associated with the post construction land use;
- 2. submit the construction plan to the local soil and water district office or to the local "Municipal Separate Storm Sewer System" (MS4) entity if your facility is located within an MS4 jurisdiction. Contact IDEM at the number on the right to determine if you are within a MS4 jurisdiction; and,
- 3. submit a notice of intent (NOI) (including proof of publication, plan approval verification, and \$100 application fee), to IDEM at the address in the orange box on the right.

If you have already started your land disturbing activity without a valid permit under 327 IAC 15-5, your facility needs to obtain a valid permit. To obtain a permit complete the three steps described above and take immediate action to implement appropriate erosion and sediment control measures to reduce the discharge of sediment.

For information regarding the development of a construction plan see the Indiana Storm Water Quality Manual at www.idem.IN.gov/ stormwater/2363.htm or contact IDEM's **OWQ Wetlands and Storm** Water Section at (800) 451-6027 or (317) 234-3980.

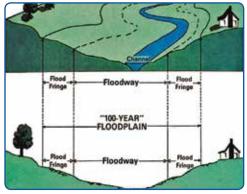


Construction activity exceeding one acre.

Indiana Department of **Environmental Management** Office of Water Quality Wetlands - Storm Water Section 100 N. Senate Avenue MC 65-42 IGCN 1255 Indianapolis, IN 46204-2251.



Extensive soil build-up.



Map of floodway and floodplain.

# Is there extensive soil build-up on the roads around your facility?

Extensive soil build-up can be defined as the amount of soil or dirt build-up that may be a potential vehicle contamination issue, driving obstruction or driving hazard. Examine the roads around your property. Can you see evidence that soil is being tracked onto the roads?

If there is evidence of soil tracked onto roads you can come back into compliance by keeping all public and private roadways cleared of accumulated soil/sediment resulting from run-off or tracking. Document all of your efforts in clearing the debris. Bulk clearing of soil/sediment cannot include flushing the area with water. Any cleared soil/sediment shall be redistributed on site so that it will not run-off or be tracked off the property.

# Is your facility (or any part of it) located in a potential floodway?

Examine your facility to determine if any part of it is in a floodway. A floodway is the channel of a river or stream and the parts of the floodplain adjoining the channel that are reasonably required to efficiently carry and discharge the flood water or flood flow of a river or stream.

"Floodplain" means the area adjoining a river or stream that has been or may be covered by flood water.

# If you answered "YES" to the above question, does your facility have any construction or filling activities in a potential floodway?

If you have determined that your facility is in a floodway, are you planning/conducting any construction activities at your facility? A permit is required to erect, make, use, or maintain a structure, an obstruction, a deposit, or an excavation in or on a floodway. Typical activities requiring a permit may include bank protection, bridges, buildings, culverts, channel work, dams, excavations, fills, levees, outfalls, clean-ups, removals, and utility crossings.

If you are conducting construction or filling activities in a floodway, then you will need to contact the Indiana Department of Natural Resources — *Floodplain Management Section* at (877) 928-3755 or (317) 232-4160 to obtain a floodway construction permit.

# Is your facility (or any part of it) located within a potential wetland area?

The Clean Water Act defines wetlands as those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions.



Construction within a floodway.

For additional information about activities in a floodway, visit the Indiana Department of Natural Resources web site at www.IN.gov/dnr/water/2459.htm



Forested wetland area.



Emergent wetland area.

For additional information about wetlands regulations, visit IDEM's web site at:

www.idem.IN.gov/wetlands/
index.htm

This definition from the Clean Water Act means that a wetland has three main characteristics.

- The first characteristic is vegetation. Wetland vegetation generally has shallow root systems, swollen trunks, and roots that grow above the soil surface. Common wetland vegetation includes cattails, bulrushes, sphagnum moss, bald cypress, willows, sedges, rushes, arrowheads and lily pads.
- The second characteristic is hydric soils (e.g., soils that are developed in conditions where water has limited soil oxygen for long periods of the growing season). Indicators of hydric soils include peats or mucks, a thick layer of decomposing plant material on the surface, blue-gray or grayish color soil, or a rotten egg smell.
- The third characteristic is hydrology. Wetlands can be hard to recognize as they can be dry during part of the year. Wetlands need to have water at or above the soil surface for a sufficient period of time so as to influence plant and soil type. Examples of wetland hydrology include standing or flowing water observed on the area during the growing season, waterlogged soil during the growing season, water marks on trees or other erect objects, and thin layers of sediments on leaves or other objects.

If you determine that your facility is located in a potential wetland area, you will need to find out if you are subject to permitting. To determine any requirements that you may be subject to, contact IDEM's *OWQ* — *Wetlands & Storm Water Section* at (800) 451-6027, also contact the USACE at (502) 315-6733 (Louisville), or (574) 232-1952 (South Bend).

Does your facility or your landlord pay a municipality or community for water service?

If "YES", skip question 5a.

# If you answered "NO" to the above question, does your facility have a Public Water System (PWS) ID number?

A "public water system (PWS)" is any facility that has at least fifteen (15) service connections or regularly serves an average of at least twenty five (25) individuals daily for at least 60 days per year.

A PWS ID number is also needed for a private well that serves twenty five (25) individuals for at least 60 days per year. If your facility does not have a PWS ID number, you must contact IDEM's *Drinking Water Branch* at (800) 451-6027 or (317) 234-7430.

# Has your facility submitted a Rule 6 Notice of Intent (NOI) letter for storm water run-off exposed to industrialactivity?

A notice of intent (NOI) letter is a written notification indicating a facility's intention to comply with the terms of 327 IAC 15-6, or Rule 6 general storm water requirements, in lieu of applying for an individual national pollutant discharge elimination system (NPDES) permit. An NOI letter includes information requiredunder 327 IAC 15-6-5.

If your SIC code is 5015 or 5093, and you have activities or materials exposed to rain and snow, and you have a point source discharge composed of storm water and allowable non-storm water toa water(s) of the state, then you need to submit a Rule 6 NOI letter for storm water run-off (327 IAC 5-1.5-40).

A Point source discharge is any discernable, confined, and discrete conveyance, including, but not limited to, any of the following from which pollutants are or may be discharged:

Pipe
 Tunnel
 Ditch
 Conduit
 Channel
 Well

For additional information about drinking water, visit IDEM's Drinking Water web site at www.idem.IN.gov/cleanwater/2386.htm

If you have any questions about drinking water rules and regulations contact the IDEM *Drinking Water Branch* at (800) 451-6027 or (317) 234-7430, or the U.S. EPA *Safe Drinking Water Hotline* at (800) 426-4791.



Planned retention pond.

For more SIC codes, visit the U.S. Department of Labor Occupational Safety and Health Administration (OSHA) web site at www.osha.gov/pls/imis/ sicsearch.html

Regulated Industrial Activity Categories						
SIC C	SIC Code * Activity Description					
10xx	Metal mining					
13xx	Oil and gas extraction					
14xx	Nonmetallic minerals, except fuels					
20xx	Food and kindred products					
21xx	Tobacco products					
22xx	Textile mill products					
23xx	Apparel and other textile products					
24xx	Lumber and wood products					
25xx	Furniture and fixtures					
26xx	Paper and allied products					
27xx	Printing and publishing					
28xx	Chemicals and allied products					
29xx	Petroleum and coal products					
30xx	Rubber and miscellaneous plastic products					
31xx	Leather and leather products					
32xx	Stone, clay, and glass products					
33xx	Primary metal industries					
34xx	Fabricated metal products					
35xx	Industrial machinery and equipment					
36xx	Electronic and other electric equipment					
37xx	Transportation equipment					
38xx	Instruments and related products					
39xx	Miscellaneous manufacturing industries					
40xx	Railroad transportation					
41xx	Local and interurban passenger transit					
42xx	Trucking and warehousing					
43xx	United States Postal Service					
44xx	Water transportation					
45xx	Transportation by air					
5015	Motor vehicle parts, used					
5093	Scrap and waste materials					
5541	Gasoline service stations **					

List of SIC codes that automatically require a storm water permit.

For additional information about storm water, contact IDEM's OWQ — Wetlands and Storm Water Section at (800) 451-6027 or visit www.idem.IN.gov/stormwater

A Water of the State is an accumulation of water, surface and underground, natural and artificial, public and private, or parts thereof, which are wholly or partially within, flow through, or border upon this state. However, the term does not include any private pond, or any pond, reservoir, or facility built for reduction or control of pollution or cooling of water prior to discharge unless the discharge there from causes or threatens to cause water pollution.

If you have no materials (e.g., cars, parts, machinery) stored outside, and no activities (e.g., fluid removal, crushing, shredding, dismantling) conducted outside, then you can file a U.S. EPA – No Exposure Certification form instead of an NOI. If your facility does not meet the definition of having a point source discharge, you may submit a Notice of Termination/ Exclusion (NOT/E) form 54087.

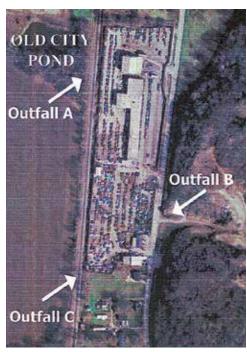
For more information regarding storm water questions, you may contact IDEM's Storm Water Permits Coordinator toll-free at (800) 451-6027, ext. 4-3980. Note, if you do not need to file an NOI, you may skip questions 6a through 13.

The NOI form can be obtained on the Indiana Archives and Records Administration web site at www.in.gov/iara/2362.htm. You will need to search for Rule 6
Notice of Intent (NOI) Letter, State Form 51286.
The no exposure exclusion form can be obtained on the U.S. EPA Web site at https://www3.epa.gov/npdes/pubs/msgp2008\_appendixk.pdf. The Notice of Termination/Exclusion (NOT/E) form can be found on the Indiana Archives and Records Administration web site at http://www.in.gov/iara/2362.htm. You will need to need to search for Notice of Termination/Exclusion (NOT/E) or State Form 54087.

#### **Does your NOI identify all the locations** of outfalls and drainage areas (i.e., an area that discharges surface water) at your facility?

An outfall can be any location where water leaves your property through a variety of conveyances, such as pipes, ditches, channels, tunnels, conduits (i.e., a natural or artificial channel through which something such as a fluid is conveyed), streams, curbs, gutters, or drain inlets.

Examine all your activities that could lead to storm water contamination (e.g., fluid removal, crushing, storage, dismantling). Identify all locations that storm water can travel from each activity and write them down. Next, compare the outfalls and drainage areas that you wrote down to the ones listed in your NOI. If there are differences between the two, then you will need to contact IDEM's OWO — Wetlands & Storm Water Section at (800) 451-6027 and submit an amended NOI that reflects the outfalls and drainage areas on your property.



Aerial photo of auto recycler salvage yard with outfalls noted.

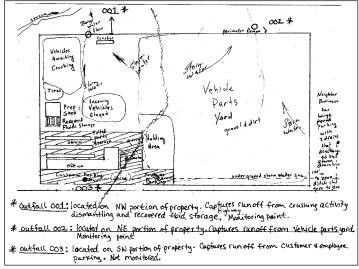


Diagram of auto salvage recycler yard with outfalls noted.

# STORM WATER POLLUTION PREVENTION PLAN A Recycling Facility

Sample storm water pollution prevention plan cover page.

For further information, the U.S. EPA has developed a manual to guide facilities in developing their own storm water pollution prevention plans. To order "Storm water management for industrial activities: developing pollution prevention plans and best management practices manual", (document number U.S. EPA 832-R-92-006), call the National Technical Information Service at (800) 553-6847.

# Has your facility developed a Storm Water Pollution Prevention Plan (SWP3)?

The SWP3 is a written document that prevents pollutant sources from entering storm water run-off by developing and implementing best management practices and controls at your facility. If you are required to submit a Notice of Intent (NOI), you will also need to develop a SWP3. You have 365 days from the time you submit your NOI to develop and implement your SWP3.

#### The SWP3 should include:

- a list of staff and their responsibilities for the storm water pollution prevention team;
- a copy of the NOI;
- a site map and soil maps;
- a description of the potential pollutant source areas, and a description of existing and planned management activities;
- sampling strategies and analytical results of run-off monitoring; and,
- references to any other applicable facility plans.

# Has your facility submitted the Storm Water Pollution Prevention Plan (SWP3) certification checklist (form 51287) signed by a qualified professional to IDEM?

If you are required to develop on an NOI and SWP3, you will also need to submit the SWP3 checklist signed by a qualified professional. A qualified professional is someone trained and experienced in storm water treatment techniques. An example of this may be a consultant or engineer who does storm water work.

# Is your facility implementing good housekeeping measures and storm water Best Management Practices (BMPs) included in the SWP3?

If you are required to create a SWP3, you are also required to implement the good housekeeping measures and storm water BMPs that are included in your SWP3.

Good housekeeping is defined as maintaining a clean work environment to reduce or eliminate the potential mobilization of pollutants by storm water.



View of auto recycler yard practicing good housekeeping.

For additional information about storm water, contact IDEM's OWQ — Wetlands and Storm Water Section at (800) 451-6027 or visit www.idem.IN.gov/stormwater



Pooled storm water.

#### 

Example of a quarterly storm water inspection form.

Sediment build-up at or

Storm water BMPs are any of the following measures to prevent or reduce the pollution of the Waters of the State:

- schedules of activities (such as sweeping),
- prohibitions of practice,
- treatment requirements,
- operation and maintenance procedures,
- use of containment facilities and,
- other management practices.

Examine your routines and policies at your facility. Do you conduct daily, weekly, or monthly inspections (depending on your needs) to determine if spills are cleaned-up, all fluids are stored in closed containers, all removed parts are stored under cover, and any other activities required to keep your facility clean and running smoothly are occurring? If you are not conducting inspections to check on these things, you will need to begin doing so.

# Do you have records documenting your quarterly storm water inspections?

If you do not conduct quarterly inspections, or you do not maintain records of your quarterly inspections, you will need to do so immediately and then address any problems noted during an inspection. Be sure to maintain records so that they are available to IDEM upon request.

See *Appendix: Quarterly Storm Water Visual Monitoring* for an example of a monitoring form.

#### Do you have records of your annual employee training on the components and goals of the SWP3?

Do you conduct annual storm water training and maintain records? If your answer is "NO", then you will need to provide and document annual training to all employees regarding the components and goals of the SWP3.

For an example of how to track this training, see Appendix: Annual Storm Water Pollution Prevention Plan Training.

#### Has your facility submitted storm water sample results of the required twelve (12) parameters?

The required parameters are: oil and grease, CBOD5 (carbonaceous biochemical oxygen demand), COD (chemical oxygen demand), TSS (total suspended solids), TKN (total kjeldahl nitrogen), total phosphorous, pH, nitrate plus nitrite nitrogen, lead, iron, copper and aluminum.

On an annual basis (or more frequently if requested), you will need to sample the outfalls designated on your NOI. The first annual sample must be taken prior to the implementation of the SWP3. Samples must be taken during a qualifying rainfall event. This means that all samples must be collected from discharges resulting from a measurable storm event at least 72 hours after the previous measurable storm event. A measurable storm event means the total accumulation of rainfall must be greater than or equal to one-tenth (1/10) an inch of rainfall.

Required grab samples must be collected during the first 30 minutes, or as soon thereafter as practicable, of discharge at the storm water outfalls. The pH measurement must be taken at the time the grab sample is collected (i.e., due to holding time exceedance, pH can not be analyzed by an off-site laboratory), and can not be estimated using a color comparison (e.g., test strips).



Properly kept facility records.

<b>Annual Storm Water Pollution Prevention</b>					
Plan Training					

- Topics to be covered during the annual training include:

   The purpose and requirements of the Storm Water Pollution Prevention Plan;

   Spill prevention and response procedures;
- Spin procedures, Reporting procedures; Automotive fluids, used oil and spent solvent management; Good housekeeping practices;
- Lead-acid battery management
- Current and proposed Best Management Practices; Parts handling and storage.

Have each employee at the training sign a sheet (sample below) and give the date and

instructor of the training.	, , ,				
Annual Storm Water Pollution Prevention Training Facility Name: Location:					
Print Name	Sign Name				
Instructor:	Date:				

Example of an annual storm water pollution prevention plan training log form.

For more information on a qualifying rain event and how to sample, visit www.idem.IN.gov/stormwater/ 2382.htm or www.ecy.wa.gov/pubs/ 0210071.pdf



Water samples.



Water sample testing.

- \* Contamination means the results exceed the benchmark level.
- \*\* A sudden increase will be a marked increase in TKN results when compared with previous annual testing.

Each time you sample, you will need to test for all the parameters listed above. For information on where to send your samples, call IDEM's *OWQ* — *Wetlands & Storm Water Section* at (800) 451-6027, ext. 3-8488, or go to www.idem.IN.gov/4988.htm for a list of labs and consultants located in the state. A copy of the results must be submitted to IDEM within 30 days after receipt back from the lab. This submittal should include analytical results, a chain of custody form and field data from the time the sample was collected.

If you have not submitted your results, please do so immediately. If you have not taken your required storm water samples, you will need to sample all identified storm water run-off sources of the next measurable (1/10 of an inch) rainfall event and submit results, as well as plans to ensure sampling takes place annually, to IDEM

## **12**a

## Do your sample results indicate any contamination\*?

Examine your storm water results. Do the results exceed the following benchmarks?

- Oil and grease: 15 mg/L
- CBOD5: 30 mg/L
- COD: 120 mg/L
- TSS: 100 mg/L
- TKN: Unknown sudden increase\*\*
- Total phosphorous: 2.0 mg/L
- pH: 6.0-9.0 (anything < 6.0 and > 9.0 will result in answering YES)
- Nitrate plus Nitrite Nitrogen: 0.68 mg/L
- Lead, total: 0.0816 mg/L
- Iron, total: 1.0 mg/L
- Copper, total: 0.0636 mg/L
- Aluminum, total: 0.75 mg/L

If any of your results exceed the benchmark results, go to question 12b.

#### Did your facility identify the source(s) of the contaminant(s) and eliminate them?

If you determined that storm water results exceeded the benchmark levels, you will need to identify the source(s) of the contaminants(s) and eliminate them.

#### Has your facility submitted the annual report to IDEM?

The annual report is required to be submitted 365 days after the NOI submittal

The annual report should include the following:

- 1. any changes to the original NOI;
- 2. any changes to facility, operations or activities;
- 3. comparison of all sampling results; and,
- 4. any BMPs or corrective measures implemented.

If you have not submitted your report, you will need to do so immediately.

All correspondence should be addressed to:

**Indiana Department of Environmental Management** Office of Water Quality Rule 6 Coordinator 100 N. Senate Avenue, MC 65-42 Indianapolis, IN 46204-2251

For more information, call IDEM - Office of Water Quality at (800) 451-6027, ext 3-8488 or (317) 234-3980.



Fluid release from salvage vehicle.



**IDEM facility inspection.** 

## **TELEPHONE NUMBERS**

Agency	Telephone number
IDEM	(800) 451-6027 or (317) 232-8603
IDEM-Emergency Response	(888) 233-7745
IDEM-OAQ	(800) 451-6027 ext. 3-0178 or (317) 233-0178
IDEM-OLQ Industrial Waste	(800) 451-6027 ext. 4-6951 or (317) 234-6951
IDEM-CTAP	(800) 988-7901 or (317) 232-8172
IDEM-OWQ Drinking Water	(800) 451-6027 ext. 4-7430 or (317) 234-7430
IDEM-OWQ Wetlands & Storm Water	(800) 451-6027 ext. 4-3980 or (317) 324-3980
IDEM-Underground Storage Tanks	(800) 451-6027 ext. 4-7957 or (317) 232-7957
IDNR - Floodplain Management	(877) 928-3755 or (317) 232-4160
Indiana State Fire Marshal	(317) 232-2222 or (317) 232-2236
National Technical Information Service	(800) 553-6847
U.S. Army Corps of Engineers- Louisville	(502) 315-6733
U.S. Army Corps of Engineers- South Bend	(574) 232-1952
U.S. EPA Safe Drinking Water Hotline	(800) 426-4791
U.S. EPA SPCC Information	(312) 886-9497

## **WEB SITES WITH ADDITIONAL INFORMATION**

Description	Web site:
Air Compliance Assistance	www.idem.IN.gov/airquality/2344.htm
Air Permit Assistance	www.idem.IN.gov/airquality/2356.htm
Airbag Hazard (Sodium Azide)	www.emergency.cdc.gov/agent/sodiumazide/basics/facts.asp
SOS Salvage License Form	www.idem.IN.gov/5157.htm#nonidem_bmv
Construction Plan Development Assistance	www.idem.IN.gov/5912.htm
Construction/Land Disturbance Storm Water Permits	www.idem.IN.gov/stormwater/2331.htm
Drinking Water	www.idem.IN.gov/cleanwater/2381.htm
<b>ELVS Program</b>	www.elvsolutions.org/
<b>Environmental Consultants List</b>	www.idem.IN.gov/4988.htm
EPA Sweat Furnace Brochure	nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=000037AN.pdf
<b>Equipment Capable of Certification</b>	www.epa.gov/mvac/section-609-certified-equipment
Floodplain Information	www.IN.gov/dnr/water/2459.htm
Mercury Bounty Claim Form	www.idem.IN.gov/5157.htm#olq_auto
Mercury Containing Vehicles	www.elvsolutions.org/?page_id=542
No Exposure Certification Form	www.epa.state.il.us/water/permits/waste-water/forms/no-exposure.pdf
Notice of Intent Form	www.idem.IN.gov/5157.htm#owq_stormwater
Obtaining an ELVS Bucket	www.elvsolutions.org/?page_id=13
Oil Transporters	www.idem.IN.gov/landquality/2371.htm
Open Burning	www.idem.IN.gov/airquality/2411.htm
IDEM CTAP	www.idem.IN.gov/ctap
Refrigerant Equipment Cert. Form	www.epa.gov/sites/production/files/2016-03/documents/recoveryform.pdf
Refrigerant Information	www.epa.gov/sites/production/files/2015-08/documents/ section_609_of_the_clean_air_act_motor_vehicle_air_ conditioning.pdf
Registred Tire Transporters/Processors/ Storage Facilities	www.in.gov/idem/wastetire/files/wt_processors_and _storage.pdf
Refrigerant Removal Training	https://www.epa.gov/mvac/section-609-technician-training-and-certification-programs
SIC Code	www.osha.gov/pls/imis/sicsearch.html
SPCC Plans	www.www2.epa.gov/oil-spills-prevention-and-preparedness-regulations
Storm Water Pollution Prevention Plan	www.idem.IN.gov/stormwater/2389.htm
Storm Water Rules	www.idem.IN.gov/stormwater/2382.htm
Storm Water Sampling Information	www.ecy.wa.gov/pubs/0210071.pdf
UST Registration Application	www.idem.IN.gov/5157.htm#olq_ust
UST Registration Application Waste Determinations	www.idem.IN.gov/5157.htm#olq_ust  www.idem.IN.gov/landquality/files/hw_waste_info_ determination_process.pdf

#### **APPENDICES: RECORD KEEPING FORMS**

- Annual Mercury Safety Training
- Refrigerant Removal Records
- Vehicles Obtained Without Refrigerants
- Good Housekeeping Inspection Checklist
- Best Management Practices for Water
- Quarterly Storm Water Visual Monitoring
- Annual Storm Water Pollution Prevention Plan Training

## **Annual Mercury Safety Training**

Topics to be covered during the annual training include:

- Spill prevention and response procedures;
- Mercury spill kit use;
- Reporting procedures;
- Safe mercury switch removal;
- Good housekeeping practices;
- Personal safety and appropriate personal protective equipment (PPE).

Have each employee at the training sign below.



Safety Training						
Facility Name:						
Location:						
Print Nan	ne e	Sign Name				
	· · · · · · · · · · · · · · · · · · ·					
Instructor:		Date:				
*Note: An inspector can be an material being covered.	y person authorized by the facility	w owner who has an understanding of the				

## **Refrigerant Removal Records**

I hereby certify that to on this page.	he refrigerants have be	en legally remov	ed from the v	ehicles listed
Facility Owner: Sig	n	Print		Date
All refrigerants were Address:	removed at the following	ng location:		
		1		

Refrigerant Recovered By	Date Removed	Make	Model	Year	VIN
	•				
*					

## **Vehicles Obtained Without Refrigerants**

•			ted on this page arrived at the to front end damage or prior		
Facility Owner:	Sign		Print		Date
		Address:		-	Ť

Refrigerant Verified Removed By	Date Removed	Make	Model	Year	VIN
V					
	_				
<b>Y</b>					

## **Good Housekeeping Inspection Checklist**

Use the following checklist to inspect the facility and document the results once a month (or more frequently if needed).

Title

Date

Inspected by

in an appropriately organized manner

Area/Action	What did you see?	What did you do about it?
HOLDING AREA		
Look at each vehicle for leaks, clutter, hoods down		
DISMANTLING AREA		
Check for stains, spills, leaks of fluids		
Is dismantling being done in the designated area?		
Drain gasoline when vehicles come in so it can be reused or recycled	Q	
FLUID STORAGE AREA		
Check all fluid containers for leaks, levels, labeling, and housekeeping		
INSIDE PARTS STORAGE AREA		
Ensure drip pans are in place if necessary		
Inspect for leaks and spills		
Ensure parts are stored on racks or pallets		
OUTSIDE PARTS STORAGE AREA		
Ensure parts are completely drained before storage		
Ensure parts are stored off the ground		
Inspect for leaks and spills		
VEHICLE STORAGE AREA		
Ensure all fluids have been removed from vehicles		
Ensure all batteries have been removed from vehicles		
Ensure hoods are kept down		
Ensure vehicles are stored in rows or		

Area/Action	What did you see?	What did you do about it?
PARTS WASHING/ PRESSURE WASHING AREA		
Ensure no wash water runs to the ground, down a drain, or into a septic system		
Ensure all equipment is in good working order		
If solvent sink is used, ensure regular servicing and proper disposal of spent solvent		
CORE AND SCRAP STORAGE AREAS		
Ensure cores are completely drained before storage		
Ensure cores are stored under cover over an impervious surface or out of the rain		
CRUSHING AREA		
Ensure all fluids and batteries have been removed from vehicles before crushing		
Inspect crusher for leaks and spills		
STORMWATER SAMPLING LOCATION		
Ensure sample point is accessible and clean		
Ensure nothing is stored around the sample point		
Look at the vegetation for signs of oil		
EQUIPMENT MAINTENANCE		
Evaluate each piece of equipment for leaks		
Repair any hydraulic lines, hoses, cylinders, etc. promptly		

## **Best Management Practices for Water**

Use the following checklist to select the BMPs that are appropriate to your facility. Note that the following list does not include all possible BMPs that may be beneficial to your facility.

ВМР	Implemented Yes, No, or N/A
Vehicles are inspected as they come in and are checked for cracked batteries and fluid leaks.	
All fluids are removed from vehicles before they are stored in the main storage area.	
Used oil is kept in clearly labeled containers (labeled "Used Oil") separate from parts cleaning solvents, antifreeze, and fuel.	
Engine oil is drained and stored in clearly labeled tanks or containers.	
Tanks and containers are kept in good condition, free of any visible spills or leaks, structural damage, or deterioration.	
Antifreeze is drained and reused or disposed of properly and stored in clearly labeled containers, with waste antifreeze and usable antifreeze stored separately.	
Windshield washer fluid is drained for reuse or disposal with antifreeze.	
Batteries are removed as soon as feasible after vehicle enters the facility.	
Batteries are stored inside on a pallet or outside in a leak-proof covered container, away from traffic areas.	
All pressure washing operations are performed indoors or in covered and bermed outside cleaning areas.	
Parts washing water is captured and recycled or disposed of by a licensed disposal company and NEVER allowed to run on the ground, down a drain, or into a septic system.	
Substances used to wash/clean parts are replaced by less volatile/less harmful products whenever possible (i.e., non-phosphate soaps for detergents, naphtha for harsher solvents).	
Cleaning fluids are recycled and reused where practical.	
Crusher fluids are captured to prevent spillage. This mixture of fluids is collected in a spill-proof covered container and disposed of properly. It is not allowed to run on the ground, down a drain, or into a septic system. The drain within the crusher is kept clean so that the fluids do not collect and overflow from the crusher onto the ground, down a drain, or into a septic system.	
A preventive maintenance program that involves timely inspections and/or maintenance of all facility equipment has been	

developed.	
The crusher and other equipment are kept clean.	
BMP	Implemented Yes, No, or N/A
Periodic inspections of equipment for leaks, spills and malfunctioning, worn or corroded parts are conducted. Tanks, valves, hoses, and containers are regularly inspected and checked for signs of wear or weakness.	
Valves on secondary containment are kept in the "off" position and locked at all times, except when collected water is being removed.	
Labeled spill clean up equipment is provided at locations where spills are most likely to occur.	
Clean-up procedures are in place, including the use of dry absorbent materials or other clean-up methods to collect, dispose of, or recycle spilled or leaked fluids. An adequate supply of dry absorbent material is kept on-site and disposed of properly. Used absorbent is never disposed of in vehicles to be crushed.	
Oil or other fluids spilled during parts removal are immediately contained, cleaned up, and the cleaning materials disposed of properly.	
When parts are removed, they are drained. Drip pans are not left unattended.	
When refueling, vehicles and equipment are parked as close to the pump as possible. The fuel nozzle is kept upright when not in use, and replaced securely in the pump.	
Any spills that may occur around fueling areas are immediately controlled, cleaned up, and the cleaning materials disposed of properly.	
All fluid, waste, and core containers are labeled, kept closed and stored away from traffic areas, preferably under cover.	
All tanks, drums, and containers are inspected regularly as required for leaks, spills, and labeling.	
Vehicle fluids, oil, or fuels are not used for dust control or weed control.	
Parts are removed on a concrete pad, under cover.	
Training on pollution prevention is provided annually to all employees.	
The SWPPP is reviewed annually and modified as needed.	
No solvents, detergents, wash water, or other fluids are poured down a drain, into a septic system, or allowed to run on the ground.	
Hoods are kept down where any vehicles are stored.	

## **Quarterly Storm Water Visual Monitoring**

1st Quarter	Inspected by	Title	Date
2nd Quarter	Inspected by	Title	Date
3rd Quarter	Inspected by	Title	Date
4th Quarter	Inspected by	Title	Date

Use the following checklist to visually examine a sample of your storm water runoff once each calendar quarter, when and if you have a discharge, and verify that no noticeable pollutants are present in the storm water discharge. Make copies of this page to use for each quarter. N/D = no discharge. The results are to be kept with the SWPPP.

DO YOU SEE?	DESCRIBE WHAT YOU SEE (suds, oil sheen, water is cloudy, smell of gasoline)	POTENTIAL SOURCE (Anything seem to be different or out of place?)	CORRECTIVE ACTION (What did you do to fix the problem?)
Material floating on the surface of the water?			
Solids settling to bottom of container?			
Solids suspended in water?			
Oil or grease?			
Discoloration of the water?			
Turbidity (is the water cloudy or clear)?			
Foam or suds?			
Odor (gasoline, antifreeze)?			
Other unusual conditions about the water?			
Dead aquatic life?			
Sediment build-up at or down stream from your property?			

# Annual Storm Water Pollution Prevention Plan Training

Topics to be covered during the annual training include:

- The purpose and requirements of the Storm Water Pollution Prevention Plan;
- Spill prevention and response procedures;
- Reporting procedures;
- Automotive fluids, used oil and spent solvent management;
- Good housekeeping practices;
- Lead-acid battery management;
- Current and proposed Best Management Practices;
- Parts handling and storage.

material being covered.

Have each employee at the training sign a sheet (sample below) and give the date and instructor of the training.

# **Annual Storm Water Pollution Prevention Training**

Facility Name:			
Location:			
		·	
Print I	Vame	Sign Name	
Comments:			
Instructor:		Date:	
	any person authorized b	y the facility owner who has an und	lerstanding of the



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