Indiana Auto Salvage Environmental Results Program (ERP): Encouraging Environmental Performance and Leadership

Indiana Department of Environmental Management Commissioner Thomas Easterly (left) officially recognizes Adkins Auto Parts (employees in gold) as a gold-level Indiana Clean Yard. The ceremony was attended by other community leaders.

Final Report, December 2010
U. S. EPA State Innovation Grants Program

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In Memoriam: Rosemary Cantwell

IDEM dedicates this final report to the memory of Rosemary Cantwell. Rosemary was formerly the Section Chief of Industrial Waste 1. She led the grant proposal and project implementation for the Auto Salvage ERP. She passed away suddenly in March 2010. She had served IDEM for a quarter century (1986-2010).

Project Title: ***Indiana Environmental Results Program: Auto Salvage Sector***

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Introduction

This is the final report for the Indiana Environmental Results Program: Auto Salvage Sector, which was undertaken with funding provided by a U. S. EPA State Innovation Grant. IDEM's Industrial Waste Compliance Section 1 was the primary implementer and worked with several partners (see Project Implementation). This report will discuss the factors which led to the decision to use ERP as a model to address the Auto Salvage Sector in Indiana; the steps used to plan and implement the program; statistical findings; lessons learned through this program; and what steps will or could be taken next.

Project Background/Context

Indiana Auto Salvage Yards: A Persistent Problem

Past complaints and an earlier auto salvage initiative showed that land, air, and water violations were commonplace at Indiana auto salvage facilities. This sector has historically been a lightning rod for pollution complaints, netting over 100 auto salvage-related complaints in some years. IDEM was expending a great deal of resources addressing these complaints and recognized the need to address these sector-wide environmental problems in a more comprehensive manner.

New Approach Needed

IDEM decided to institutionalize the pilot program begun by the previous initiative, but believed a new approach was needed to try to address the persistent, cross-media problems observed in auto salvage yards. ERP offered an opportunity to cost-effectively improve the scope and scale of IDEM's auto salvage approach. The benefits of using the ERP approach included:

- The typical ERP is holistic, a good fit for the continuing cross-media problems observed at auto salvage yards;
- ERP offers organized, plain-language compliance assistance that seemed well suited to the sector, because facilities in the sector are typically small independent operations with little technical background in environmental issues.
- ERP offers the potential to reach (and understand the performance of) large numbers of auto salvage yards spread across the state, in a way that IDEM believed traditional methods of compliance assurance could not.

Background on the Environmental Results Program (ERP)

The Environmental Results Program (ERP) is an integrated approach to addressing environmental problems associated with various business sectors and other groups having large numbers of small facilities. While individual facilities within these groups may release small amounts of pollution, the aggregate impact can be significant.

A typical ERP combines several interlocking policy tools in a cyclical process to address environmental problems in a sector (see Figure 1). These tools include:

- Plain-language outreach on key environmental issues;
- Voluntary or mandatory facility self-certification regarding performance on those issues;
- Agency site visits to assist facilities and verify performance; and
- Statistically based performance measurement.

Figure 1. ERP: Interlocking tools in an integrated system.

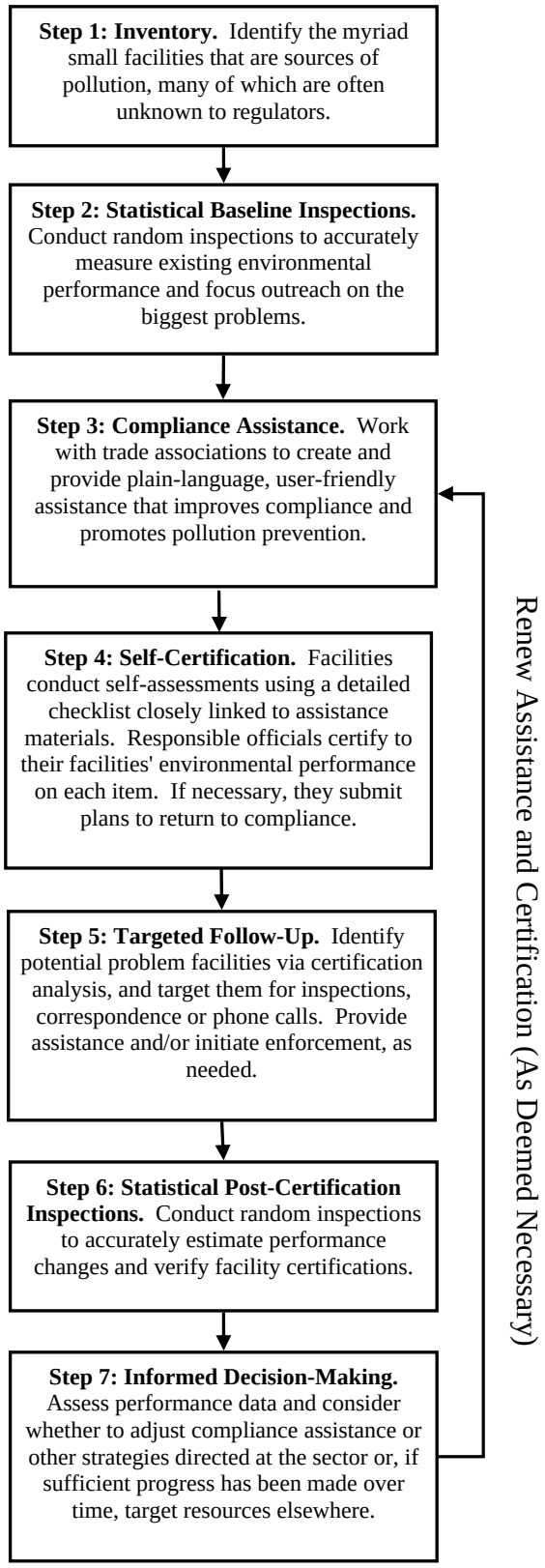
ERP's mix of tools is designed to drive facilities to hold themselves more accountable and give them the capability and incentive to improve performance. For instance, regulators sometimes find that large percentages of facilities report they are out of compliance with one or more requirements on their first self-certification forms, and submit plans to return to compliance. Therefore, businesses should be able to recognize a problems and correct them with minimal IDEM oversight.

How Does an Integrated ERP Work?
A typical ERP cycle combines several interlocking tools in a cyclical process and can be thought of as a series of general steps (see Figure 2). Compliance assistance specifies how facilities should assess their operations and certify compliance, while agency inspectors document progress against performance indicators that are linked to self-certification checklists. Performance data, in turn, inform and improve the next round of compliance assistance. No two ERPs are exactly alike, however, because states have adapted this approach for a wide variety of circumstances. For instance, many states have successfully implemented ERPs with voluntary submission of self-certifications, when mandatory certification was not feasible.

History of ERP
The Massachusetts Department of Environmental Protection developed ERP over 10 years ago, in the midst of department-wide budget cuts, as a cost-effective strategy to improve and measure the performance of such groups. More than one-third of U.S. states have now developed or are implementing at least one ERP. Increasingly, states are also exploring new ways of applying ERP components.

For more basic information on ERP, including its history, read the "ERP States Produce Results 2007 Report," available on EPA's ERP website: www.epa.gov/erp.

Figure 2. A Typical ERP Cycle



Project Implementation

IDEM's ERP implementation approach was consistent with the typical ERP approach described in the prior section, with the addition of an environmental leadership/recognition component. This section provides a brief overview of IDEM's auto salvage ERP timeline, as implemented; identifies the project partners who collaborated with the Industrial Waste Section 1; and provides a detailed table of project activities and outputs, organized by the steps in the ERP cycle as depicted in Figure 2 above. A more traditional presentation of project milestones is presented in Appendix A and Core ERP Descriptors for this program are presented in the States ERP Consortium's recommended template (Appendix B).

Brief Project Timeline

IDEM submitted a pre-proposal in the 2005 solicitation of EPA's State Innovation Grants (SIG) Program, run by EPA's National Center for Environmental Innovation (NCEI). The grant was officially awarded in 2006; after IDEM was notified of its selection a complete and formal workplan/proposal was submitted. At the time, the auto salvage sector was still an untested sector for ERP. (EPA had awarded an auto salvage ERP grant to Rhode Island DEM in 2005, but Rhode Island's implementation was just beginning in 2006.)

The following bullets identify major activities and contextual factors, for each year of project implementation following the grant award in 2006:

Year	Major Activities/Contextual Factors
2007	• Identified 548 licensed facilities using Bureau of Motor Vehicles' data • Random inspections at 48 facilities, to baseline performance • Economic downturn begins December 2007[1]
2008	• Preparation for certification and recognition program launch • IDEM begins to hear of staffing reductions at salvage yards
2009	• Deliver workbooks and workshops • Launch voluntary certification and Indiana Clean Yards recognition programs • Conduct random inspections at 50 more facilities
2010	• Data analysis • Presentation of results to IDEM upper management • Development of final report

[1] National Bureau of Economic Research. http://www.nber.org/cycles.html. 2010-09-20.

Project Team
The following internal and external stakeholders assisted in key aspects of ERP implementation. (Appendix C provides a detailed acknowledgment of the individuals who supported this effort.)

Stakeholder	Role
IDEM OLQ Industrial Waste 1 staff	Project management, development, implementation, and outreach
IDEM OPPTA	Project development and facility outreach
IDEM MACS	Development and production of outreach materials and recognition materials
IDEM OLQ Finance and Operations	Budget management
IDEM OLQ Science Services	Data management, GIS, and analytical support
IDEM OWQ Wetlands and Storm Water	Media-specific project development
IDEM OAQ	Media-specific project development
Automotive Recyclers of Indiana	Industry input, outreach, and workshop support
Michael Crow, consultant	Data analysis and reporting support

Detailed Description of Project Implementation and Outputs (By ERP Step)

Step	Dates	Summary of Activities/Outputs
Inventory	10/2006-6/2007	• Acquired Bureau of Motor Vehicles (BMV) list of over 600 licensed salvage yards; IDEM list was incomplete, having identified salvage yards only in the course of responding to complaints. • BMV list was "cleaned" to focus only on active auto salvage yards; list winnowed to 548 facilities.
Statistical Baseline Inspections	6/2007-9/2007	• 48 valid random inspections were completed (50 inspections were conducted, but 2 were excluded because the facilities were determined not to be auto salvage yards). • 7 different inspectors were involved; all received data quality training beforehand to ensure consistency. • Industrial Waste staff worked closely with other IDEM offices to develop clear, coherent and comprehensive cross-media checklist (see Appendix D). • Checklist was embedded into tablet PCs for inspectors to use in the field.

Step	Dates	Summary of Activities/Outputs
Compliance Assistance	4/2009-6/2009	• Distributed color, multi-media workbooks to all facilities in April 2009 (see Appendix E). Workbook contained removable self-certification form. Workbook developed in collaborative process with other IDEM offices beginning in 2007. • Delivered 3 workshops in May and June 2009. Workshops cosponsored by Automotive Recyclers of Indiana (trade association). Locations of Indianapolis, Valparaiso and Albany were chosen because of geographic distribution across the state and proximity to interstates (to improve travel logistics for salvage yards). Combined, workshops had 119 attendees (from 70 individual salvage yards, or 13% of the universe). • Launched ERP website for auto salvage yards. Consultant quote: "[The] IDEM Auto Salvage website is phenomenal."
Self-Certification	4/2009-7/2009	• Voluntary certification allowable beginning with distribution of workbooks; deadline of July 15, 2009 for first round of certifications. • Incentive to self-certify: possible recognition as Indiana Clean Yard (see Beyond Statistics in Project Findings below). • 45 facilities (8% of the universe) submitted certifications. • 26 of those submitted return-to-compliance plans (5% of the universe, or 57% of certifiers). 85 RTC plans submitted by those facilities.
Targeted Follow-Up	7/2009-present	• Reviewed certifications for "red flags" (e.g., inconsistencies). • Conducted record checks (e.g., storm water NOIs, mercury switch recycling records). • Reviewed Return-to-Compliance plans. • Followed up with phone calls and/or assistance. • Began helping Indiana Clean Yard recognition program applicants to achieve their goals.
Statistical Post-Certification Inspections	9/2009-11/2009	• 50 valid random inspections completed; sample drawn from full list of 548 facilities • 9 different inspectors involved; all received data quality training to ensure consistency with each other and across rounds of inspections. • Industrial Waste staff made only minor modifications to the inspector checklist.

Step	Dates	Summary of Activities/Outputs
Informed Decision-Making	2010	• Completed data entry. • Created Microsoft Excel-based tool (Results Pro) for conducting common ERP statistical analyses of inspection data. Tool was based upon earlier version created for Vermont DEC's UST ERP, also SIG-funded. • Used tool to analyze data in a variety of ways: e.g., all measures, all primary measures (a.k.a. EBPIs), compliance measures, voluntary measures, media specific measures. • Reviewed the project and its results, identified planned and potential next steps for auto salvage, and other potential ERP opportunities for IDEM. • Delivered presentation to IDEM upper management in September 2010. Commissioner, Chief of Staff, all 6 Assistant Commissioners, and a number of branch chiefs attended. IDEM project lead for SIG-funded Region 5 auto body ERP also attended.

Project Findings

IDEM conducted analysis on all valid checklist measures and drilled down on a variety of subsets of measures. Based on this analysis, IDEM's key finding is that auto salvage performance remained fairly steady despite the economic downturn that began almost immediately after baseline inspections were conducted. Salvage yards reported negative economic impacts from a substantial fall in scrap metal prices in 2008 and from the longer-lasting downturn. During the compliance assistance phase and the second round of inspections, IDEM staff learned from salvage yards and association members that yards were facing financial difficulties, and in some cases reducing staffing. In this context, one might have expected overall deterioration in performance.

However, as detailed in the subsections below, IDEM observed generally steady performance (and some key improvements), with the exception of storm water compliance. Sector performance with regard to storm water regulations decreased on almost all measures. After considering a variety of potential influences, IDEM believes that economic factors most likely have a substantial impact on storm water performance, because of the following specific issues:

- Storm water regulations are more complex, which leads to some confusion for facility operators.
- Maintaining storm water compliance can be more difficult with fewer staff.
- Yards often pay consultants to help maintain compliance with storm water, and are responsible for paying for lab tests on water samples.

The subsections below provide more detail about the statistical analysis and results for individual measures, as well as signs of progress that go beyond the statistical results. These signs of progress include increased interest in compliance assistance in the sector, increased

trust/partnership with industry, and increased environmental leadership in the sector. Detailed statistical results are provided in Appendices F, G, and H.

Statistical Analysis

Primary Measures. As primary measures, IDEM identified 10 multimedia compliance measures as priority/primary measures (akin to what are traditionally in ERP called Environmental Business Practice Indicators, or EBPIs). As indicated in the table below, the sector demonstrated one statistically significant performance improvement, with regard to used oil container conditions, along with 4 other observed increases. The sector demonstrated two statistically significant performance decreases, with regard to storm water pollution prevention planning and storm water sample submission, along with 3 other observed decreases. IDEM observed no statistically significant changes with regard to measures that summarize performance across all primary measures, such as the average facility score. (Note: IDEM used a 90% confidence level for all analyses.) At the end of the project, the observed average facility score for all primary measures was 61%, with a 90% confidence interval of 57%-65%. This means we are 90% confident that an average facility in the population is somewhere between 57% and 65% of all primary measures applicable to it. (Note: some measures may not apply to all facilities.)

Indiana DEM Auto Salvage ERP

Questions Analyzed: Performance Measures (All Primary)

90% Confidence Level

Performance Change (Round 2 minus Round 1)

# of facilities eligible for this set of questions: Round 1, 48; Round 2, 50

Measures Summarizing Performance across All Listed Questions

	Confidence Interval for Performance Change (Percentage Points)				
	Statistically Significant?	Lower Bound	Observed	Upper Bound
Average Facility Score*	no	-10.8	**-4.2**	2.4
Median Facility Score	nc	nc	**0.0**	nc
Aggregate Achievement Rate*	nc	nc	**-3.8**	nc
"Full Achievement" Rate (Achievement Rate across All Measures*)	no	-15.8	**-6.5**	2.8
Percent of Facilities Achieving At Least One Measure	no	0.0	**0.0**	0.0

Results Associated with Individual Questions

	Question Metadata (For Filtering)			Confidence Interval for Performance Change (Percentage Points)			
Number & Nickname	Compliance Question?	Priority?	Issue/Medium	Statistically Significant?	Lower Bound	Observed	Upper Bound
Air_Q01: Open Burning	Compliance	1	Air	no	-4.4	**4.4**	13.2
Air_Q07: Refrigerants Discharged	Compliance	1	Air	no	-13.9	**-2.8**	8.3
Fluids_Q01: Spills	Compliance	1	Fluids	no	-9.6	**5.4**	20.4
Mercury_Q02: Remove Switches	Compliance	1	Mercury	no	-7.7	**8.7**	25.1
Oil_Q01: Container Condition	Compliance	1	Oil	YES	2.3	**9.5**	16.8
Solid Waste_Q01: Open Dumping	Compliance	1	Solid Waste	no	-13.9	**-1.3**	11.4
Waste Tires_Q02: Open Dumping	Compliance	1	Waste Tires	no	-12.5	**0.9**	14.3
Water_Q07: NOI submitted	Compliance	1	Water	no	-30.5	**-15.0**	0.5
Water_Q09: SWP3	Compliance	1	Water	YES	-32.3	**-17.9**	-3.5
Water_Q13: Storm Water Samples Submitted	Compliance	1	Water	YES	-34.4	**-22.9**	-11.4

*For info, see the States ERP Consortium's Guide to Reporting ERP Results.
Notes: (1) Confidence intervals calculated based on EPA Results Analyzer 2007.
(2) Stat. significance based on confidence interval excluding zero.
(3) Higher proportions/scores indicate better performance.
(4) "nc" means "not calculated."

All Measures. IDEM also analyzed the set of all 65 performance measures, including both primary and secondary measures. This set of measures covered all media (air, fluids, hazardous waste, mercury, oil, solid waste, UST, waste tires, and water), and both compliance and voluntary practices. Related to this set of results, IDEM observed the following:

- 3 statistically significant performance improvements (2 related to used oil and one related to storm water[2]).
- 9 statistically significant performance decreases (6 storm water, 2 related to refrigerant removal, and 1 related to floor drain closure).

[2] IDEM does not consider this statistically significant result for storm water reliable. It relates to the percent of facilities with no water contamination according to testing of their samples. Since actual testing of storm water samples demonstrated a statistically significant decrease, IDEM suspects that the measure of decreased observed contamination may be biased.

- 6 measures showing no performance change at a 100% performance level.
- No statistically significant changes on summary measures of performance. Round 2 findings: 90% confidence interval for the average facility score ranges from 54% to 62%.

All Compliance Measures (Excluding Storm water). Given that so many storm water measures demonstrated statistically significant decreases, IDEM examined the impact of decreasing storm water performance on the overall picture of the sector by removing storm water measures from the analysis. IDEM found:

- 2 statistically significant compliance improvements (related to used oil, as mentioned earlier).
- 3 statistically significant decreases, but they all related to voluntary practices, which one might expect would falter in a poor economy.
- A statistically significant improvement in the percentage of facilities achieving *all* performance measures, both compliance and voluntary. (This finding agrees with IDEM's other observations suggesting increased environmental leadership in the sector, described in a subsequent section.) Round 2 findings for this measure: 90% confidence interval of 3%-14%.
- No other changes in summary measures for this subset of items. Round 2 findings for the average facility score: 90% confidence interval of 69%-77%.
- When examining just compliance measures, without storm water, IDEM also observed key summary measures (i.e., average facility score, aggregate achievement rate) did not show a significant change.

Beyond Statistics: Other Outcomes

IDEM observed several additional outcomes that IDEM believes supports the case that ERP had a positive impact in helping to maintain general sector performance levels: downward trends in formal enforcement cases and complaints, baseline inspections apparently encouraging efforts to improve, increased interest in compliance assistance, increased environmental leadership within the sector, and increased trust/partnership with industry.

Formal enforcement cases are trending downward. The table below shows number of formal enforcement cases (i.e.: legal action was begun) per year.

Year	Enforcement Cases
2004	14
2005	15
2006	12
2007	8
2008	7
2009	0
2010	2

Prior to 2004, auto salvage enforcement cases, if there were any, would not have been tracked separately. The high numbers seen in 2004-2006 were due in part to an earlier auto salvage initiative. It's interesting to note that we did not see a similar spike after either of our ERP

inspection rounds in 2007 and 2009. In addition to the downward trend in formal enforcement, a downward trend in auto salvage complaints as a percent of total IDEM complaints was noted, as seen in the table below. This could suggest that auto salvage yards are improving relative to other industries. (Note: 2010 was excluded because data were incomplete.)

Year	# Auto Salvage Complaints	Auto Salvage Complaints as % of Office of Land Quality Total	Auto Salvage Complaints as % of IDEM Total
2006	73	15	5
2007	95	11	4
2008	80	12	4
2009	47	7	2

Inspections Appear to Encourage Improvement. Evidence suggests that facilities that were inspected in the baseline were more likely than others to seek out assistance and to certify. Specifically, 27% of the baseline sample ultimately attended a workshop, whereas only 13% of all facilities attended a workshop (and 14% of the post-certification sample). Further, 19% of baseline facilities ultimately submitted certification forms, compared to 8% of all facilities (and 4% of the post-certification sample).

Increased Interest in Compliance Assistance. Auto salvage yards in general demonstrated their increased interest in compliance assistance in two ways: through attendance at workshops and an increase in requests for compliance assistance visits.

- 70 businesses (12%) of all auto salvage yards attended one of three workshops.
- After the workshops and launch of the certification program, IDEM observed a 50% increase in requests for confidential assistance visits. Specifically, 18 visits were requested from May 2008 to April 2009, and 27 were requested from May 2009 to April 2010.

Increased Environmental Leadership within the Sector. IDEM observed an increased level of environmental leadership within the auto salvage yards sector, in several ways. First, as mentioned above, data analysis showed a statistically significant performance improvement with regard to combined compliance and voluntary performance (excluding storm water). IDEM believes a key component of ERP that contributed to this trend was the Indiana Clean Yards recognition program.

Under this program, facilities that voluntarily certified and demonstrated full compliance were eligible to become an Indiana Clean Yard. The most ambitious facilities could strive for Indiana Clean Yard-Gold status by achieving full compliance along with a score of 75% on a checklist of best management practices.

To date, ten facilities have become Indiana Clean Yards (with seven of those facilities achieving Gold status). Indiana Clean Yards receive the following from IDEM:

- A certificate of recognition (for Gold yards, presented by the IDEM Commissioner and/or Assistant Commissioner), example shown in Appendix I;
- Counter mats that provide recognition and remind them and their customers of key good environmental practices;

- An Indiana Clean Yards logo, for use in their own promotional materials (see Figure 3); and
- A press release recognizing them for their efforts.

Figure 3. Indiana Clean Yard logo.

Yards also receive the satisfaction of becoming an environmental steward, and may also receive notable recognition within their own communities and even the broader world of automotive recycling. For example, when Adkins, Inc. received their Indiana Clean Yard-Gold award, many community members, including the mayor, were on hand to congratulate facility owners and staff (see cover photo). The facility also received coverage in the local newspaper (Appendix J) and a national publication (http://www.recyclingtoday.com/indiana-auto-recycler-clean-yard.aspx).

Sometimes, participants in environmental leadership programs were already strong environmental leaders before joining the program. IDEM believes that the Indiana Clean Yards program encouraged at least some shops to transition from poor performance to outstanding performance. One example is Wright's Auto Parts, in Brown County, Indiana. This facility had a variety of violations noted during a baseline inspection. Mr. Wright reacted proactively by attending a workshop, submitting self-certification, and resolving all violations. His interest in environmental compliance went further and his facility was awarded Indiana Clean Yard-Gold status earlier this year.

Increased Trust/Partnership with Industry. As part of developing and implementing this ERP, IDEM found itself working in a trust-based partnership with the sector that had not existed in the past. As Marty Hollingshead of Northlake Auto Recyclers wrote in an October 2009 letter to IDEM:

> ***"This is the first time I have seen a government regulatory agency work with business in a cooperative nature... [T]hank you for starting the clean yard program [sic]."***

While not replacing the necessity of traditional compliance approaches, this sort of partnership can yield important benefits.

Most prominently, 26 auto salvage yards (about 5% of the universe) submitted return-to-compliance plans, effectively demonstrating their trust that IDEM would work collaboratively with them in resolving problems. It's likely that at least some of the other yards that certified fixed problems before submitting certifications to IDEM. In these circumstances, IDEM believes that improved environmental performance was encouraged without requiring the need for what can be resource-intensive enforcement actions.

IDEM also enjoyed active support from members of the sector. For instance, a local Pull-A-Part facility was involved in the development of the workbook and the company's Senior Vice President, Steve Levetan, appears in the DVD created to accompany the workbook. The owner of another yard, Charles Wright, stood up at the workshop he attended to tell the other attendees about the benefits of participating in ERP and his positive experience in working with IDEM. Further, Auto Recyclers of Indiana (the trade association) assisted in materials development and

outreach. Unfortunately, however, the association has limited membership (<10% of the universe), so the impact of its promotional efforts may have been limited.

Additional Benefits for IDEM

In addition to perceived improvements in environmental performance by auto salvage yards, ERP provided a number of other benefits to IDEM.

Improved Capacity for Evidence-based Decision-Making. IDEM feels that the experience of collecting, analyzing and assessing the wealth of ERP data has improved Department skills in this area, and we believe it will lead to cost-effective management decision-making in the future. For instance, our analysis of ERP data is at the core of decision-making about next steps with regard to ERP and auto salvage yards.

Easy Microsoft Excel-based Tool for Data Analysis. To facilitate data analysis -- particularly exploratory data analysis at the heart of evidence-based decision-making -- IDEM decided to invest in the development of a user-friendly spreadsheet tool to enable straightforward analysis of ERP-like inspection data. This tool was based upon an earlier version used by Vermont DEC for its UST ERP results. Further, the tool produces a number of core measures recommended under the States ERP Consortium Guide to Reporting Results.

Long-Lasting Compliance Assistance Materials. IDEM is proud of the quality and utility of the compliance assistance materials prepared for this project, and expects to use them again and again moving forward. Those materials include a full-color, plain-language multimedia workbook, a DVD, workshop materials, and a web site described as "phenomenal" by one auto salvage consultant who visited it.

Repeatable Self-Certification Process, Random Inspection Methodology, and Indiana Clean Yards Program. With many of the other components, IDEM feels it has invested in a robust and repeatable system that will enable easy continuance of many aspects of ERP, to the degree that IDEM sees fit. (Discussed further below in the section on next steps for auto salvage yards.)

Lessons Learned

New Program Required Reasonable Investment. IDEM spent approximately $61,000 per year over the course of the four year implementation of ERP, and considers this a modest investment considering short-space and long-term benefits. IDEM anticipates that future ERP efforts could be even more cost-effective.

Multimedia Initiatives Are Challenging. The holistic approach with ERP required the Industrial Waste 1 Section to coordinate closely with the Office of Air Quality and Office of Water Quality. IDEM believes the collaboration was largely effective, although it did slow implementation. Implementation of baseline inspections, and of compliance assistance/self-certification, could have happened earlier with a single-medium focus. Single-medium ERPs may be desirable in terms of speeding up project outcomes, reducing project budget and focusing sector attention on a smaller set of issues at one time.

Compliance Assistance Itself Is Likely Insufficient. IDEM believes the outreach component of ERP was largely well designed. Although it could be improved further (see subsection immediately below), IDEM believes that a key component of sector improvement/performance maintenance was traditional compliance aspect (i.e., inspections), as discussed above. In this sector, a large proportion of facilities may be unlikely to make substantial changes in performance without stronger disincentives (in terms of enforcement) or incentives.

Need for Further Improvements with Compliance Assistance. IDEM observed certification inaccuracy issues with regard to storm water, refrigerants and mercury. Further, inspection data analysis revealed high proportions of very low-performing facilities with regard to storm water and mercury (and few mid-performing facilities). Both of these findings, along with anecdotal reports from inspectors, suggest ongoing confusion among yards about their responsibilities in these areas.

Next Steps

What's Next for Auto Salvage Yards?
Inspection data reveal substantial need for improvement among auto salvage yards in several important areas: storm water, refrigerant management, fluid spills, and mercury management,. Consequently, IDEM anticipates continuing efforts in this sector, based on what we have learned. Specifically, as described in more detail below, the Industrial Waste 1 Section will continue its standard practice of investigating all complaints against auto salvage yards, but intends to supplement that approach with several targeted activities that leverage our ERP investment. Industrial Waste 1 Section is also considering a number of additional potential opportunities to improve performance in the sector, based on the ERP investment and/or lessons learned.

Planned Next Steps. The following steps are expected to help maintain performance levels and are relatively easily integrated into Industrial Waste 1 activities.

- Require renewal of Indiana Clean Yard status within two years of award, to ensure leadership performance levels are maintained.
- On a regular basis, deliver compliance assistance materials (ERP workbook, DVD) to all new salvage license holders, according to Bureau of Motor Vehicles listings (screening out holders that are not actually operating salvage yards). This should ensure a basic level of owner/operator awareness of environmental responsibilities and opportunities in the sector.
- Continued compliance assistance to any auto salvage yard that requests it.
- As mentioned above, continue to respond to complaints against auto salvage yards.

Additional Options under Consideration. The following options may require more substantial commitments of time/resources, and/or by their nature would be farther out in the future, so bear more careful consideration. They could be implemented by themselves or combined in various ways.

- Occasionally promote/invite a new round of self-certifications, from the whole universe or from a targeted set of facilities (e.g., new license holders).

- Periodically, conduct additional rounds of random inspections to gauge performance levels over time and adjust policy approaches accordingly (could be 3-5 years between rounds of inspections).
- Enhance our compliance assistance approach in the sector (more workshops, different sets of facilities).
- Streamline our focus on just the biggest problem areas, to focus facility attention and IDEM resources.
- Partnership and resource-sharing with other IDEM media programs.
- Partner with organizations outside of IDEM (e.g., Rhode Island partnered with the Narragansett Bay Commission and the University of Rhode Island in their implementation of an auto salvage ERP).
- Use other data sources to target our efforts (e.g., priority watersheds, identifying shops not recycling mercury switches or submitting storm water samples, using GIS analysis to identify potential trouble spots).

Broader ERP Options for IDEM, beyond Auto Salvage

The IDEM ERP project team also identified a number of potential ERP options for IDEM management to consider. We grouped these options into two categories: options involving integrated use of multiple ERP tools, and options utilizing ERP-style measurement approaches. Option identification was informed in large part by the challenging financial context facing IDEM (and most if not all state environmental agencies). Consequently, while we feel our particular auto salvage investment was quite reasonable, we aimed to focus on strategies that seemed most likely to be cost-effective and which would limit needed upfront investments. (To be clear, we consider this list of options to be a kind of menu to potentially assist IDEM management in finding specific ERP opportunities. This list does not necessarily represent a particular commitment on behalf of IDEM to pursue these options.)

Integrated ERP Approaches. IDEM may be able to substantially leverage ERP concepts by pursuing collaborations with EPA and other states; integrating ERP approaches into core program; and encouraging large businesses or other organizations to manage environmental issues using "internal ERPs."

- *More Collaborations:* IDEM may be able to reap substantial benefits from ERP by undertaking projects similar to the current Region 5 Auto Body ERP. Such collaborations offer the potential for substantial economies of scale, through the sharing of materials development costs, data processing/analysis costs, and a proportional distribution of inspections. They also may offer the potential for explicit support from the EPA Region, as well as EPA funding/resource-sharing. The most likely opportunities for collaboration will probably be with regard to emerging or persistent problems common to all the states in the region. The current autobody project fits this mold, because it addresses an urban air toxics priority and implementation of a new rule.
- *Core Programs:* IDEM may be able to adopt ERP approaches in a cost-neutral or cost-efficient fashion by integrating ERPs into core programs that are already funded, but that may not be achieving IDEM goals. Specifically, IDEM may wish to examine programs involving general permits or registrations. Such general permits or registrations might be converted to detailed, mandatory self-certifications. Regular self-certification in that context

may help achieve and maintain high performance levels, as well as giving IDEM (and potentially the public) substantial information to verify facility performance and target follow-up efforts (e.g., such as by identifying "red flags" that suggest the performance of a facility may be lagging). Complementing this approach with periodic random samples of the permitted universe would also enable objective assessment of sector-level performance. Such measurement efforts could be stretched out on a 3-5 year schedule and certainly coexist with traditional targeting methods.

- *Business Partnerships:* IDEM may find opportunities to work with large corporation (or organizations such as large universities) to integrate an ERP-style approach into its internal environmental management system. Such an approach could be used to manage numerous far-flung operations, within or outside the direct control of the corporation (which serves the role in this case as the "regulator,") in an effort to protect its own interests, such as by reducing the potential for public relations or liability problems. For instance, IDEM understands that Perdue Chicken has an agreement with EPA Region 3, in which Perdue flock managers would implement an ERP-style approach with suppliers, in an effort to better protect the Chesapeake Bay.

Alternately, IDEM could pursue voluntary agreements with sectors to encourage their going beyond compliance and verifying improve performance through ERP approaches. A model could be the Massachusetts DEP dental mercury certification program, described in EPA's *ERP States Produce Results 2007 Report.* In that program, 74% of dentists certified to voluntary, high-efficiency mercury removal equipment. Such equipment installation could be verified independently by Massachusetts, giving confidence in the certifications. The sector met and agreed-upon threshold for participation, so Massachusetts delayed the promulgation of regulations that would have required removal equipment. Massachusetts gained performance improvements earlier than would have otherwise happened through a regulatory approach, and also gained higher efficiency installations, because the regulatory approach required lower efficiency removal equipment.

ERP-Style Measurement Approaches. ERP measurement approaches may be most valuable to IDEM in terms of taking "statistical snapshots" of performance and in benchmarking those snapshots against other states.

- *Statistical Snapshots:* IDEM could consider conducting baseline statistical samples to assess new concerns and/or persistent difficulties. Doing so could enable making policy decisions that are rooted in objective evidence of performance. For instance, Massachusetts DEP is undertaking a baseline snapshot of underground storage tanks, for which DEP is the newly delegated regulatory authority. DEP intends to make policy decisions based upon analysis of the highest priority problems and the apparent root causes of those problems. Such snapshots may not always seem feasible, but costs and implementation time can be reduced through creative approaches, such as undertaking a "rapid baseline," with a streamlined checklist of top priority items and a relatively small sample size. Further, random measurement could be integrated with already planned assistance visits (to the degree that those site visits can be randomized).
- *Performance Benchmarking:* Combining IDEM's statistical snapshots with those of others could help identify areas where IDEM is leading and/or lagging relative to other agencies,

which would further help identify high-priority areas of improvement. Comparison to other agencies can also help identify strategies that may be most likely to be effective (such as those strategies that have consistent evidence of working well). This kind of information may help managers make decisions about activities that should receive budget increases versus those that should receive budget decreases. For example, in the States Common Measures Project, a group of mostly northeastern states compared the results from random samples of hazardous waste small quantity generators (SQGs), using a common set of performance measures. The states reported that a comparison of results led them to believe that better performance may be associated to some degree with active compliance assistance programs.

Dissemination Activities

As mentioned earlier, the IDEM Industrial Waste 1 Section has shared the findings of this ERP broadly within the Department. In September, the entire senior management team attended a presentation on the auto salvage ERP, which included a discussion of potential opportunities elsewhere in IDEM. One specific potential opportunity has already been identified and is being explored within the Office of Land Quality, where the Industrial Waste 1 Section is housed.

Information from the auto salvage ERP has also been shared with the IDEM's representative/project lead to the Region 5 Autobody ERP. Going forward, IDEM staff anticipate notifying the States ERP Consortium of the availability of this report and lessons learned, as well as the availability of the new Excel-based tool for analysis. IDEM staff, like those of many states, face travel restrictions, but IDEM plans on participating in Consortium conference calls to share information.

List of Appendices

A: Project Milestones

B: Core ERP Descriptors

C: Detailed List of Stakeholders

D: Baseline Inspection Checklist

E: Auto Salvage Recyclers Workbook

F: Statistical Results: Primary Measures

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I: Indiana Clean Yard Certificate

J: Indiana Clean Yard Coverage in Local Media

Appendix A

Project Milestones

Project Milestones

Task Name	Task Description	Start Date	End Date
Outreach	**Initial meetings with internal stakeholders to discuss roles and get input**	**10/06**	**09/10**
Goals Identification	**Finalize the goals of the project, upon which metrics will be based**	**10/06**	**1/07**
Measures Identification	**Finalize metrics to be tracked by this project**	**10/06**	**1/07**
Facility Identification	**Work with the Bureau of Motor Vehicles to determine facilities to be included in this project.**	**10/06**	**12/06**
Analytical Methodology	**Develop analytical methodology to drive performance measurements and analytical tasks.**	**10/06**	**10/07**
Data Input & Management Strategy	**Develop and implement an approach to cost-effectively input and manage ERP data, including primary and secondary data. Primary data consists of data from inspection reports and facility forms (including self-certification forms). Secondary data sources include lists of facilities form regulatory and private-sector databases. A data input program will be developed along with the digital inspector program.**	**10/06**	**3/07**
QAPP finalization & approval	**Finalize QAPP based upon results of the measures identification, analytical methodology, and data management tasks. Primary data collection will not occur before relevant parts of the QAPP are finalized and approved by EPA.**	**10/06**	**4/07**
Inspector Checklist	**Develop a digital inspector checklist. Work with IDEM IT and IOT to develop a network and data storage infrastructure for tablet PCs. The digital program will incorporate a multi-media compliance and BMP checklist along with tabs for access to rule language, information and guidance material. The digital program will enable the inspector to be completely mobile and efficient in the field.**	**10/06**	**6/07**

Baseline Inspections (establishing a performance measures baseline)	**Inspect facilities to establish a baseline for performance measures. Facilities selected at random from the entire population, based upon sample design from analytical methodology. Enter the data into the database as it is collected via the digital inspector program.**	**6/07**	**9/07**
Baseline Analysis	**QA inspection data, and analyze the data to establish a baseline for the project's performance measures.**	**8/07**	**6/09**
Develop Outreach Materials	**Revise and update current guidance manual. Develop self evaluation/certification forms with workbook/directions for completing forms. Identify and incorporate existing guidance materials and links onto existing web site.**	**1/07**	**5/09**
Facility assistance	**Schedule workshops. Deliver compliance/technical assistance materials to facilities and self evaluation/certification forms. Conduct workshops. Provide on-site confidential compliance assistance from the OPPTA office if requested.**	**1/08**	**6/09**
Self-certification	**Implement a voluntary facility self evaluation/certification approach by requesting sites to complete and submit forms to IDEM within 1 month. The self evaluation/certification submittal will be a legally binding record of a facility's compliance and beyond compliance practices.**	**7/08**	**6/09**
Analysis of Self-certification results	**Analysis of self-certification data, with primary purpose of identifying opportunities for selective follow-up.**	**8/09**	**11/09**
Selective follow-up	**Selective follow-up with self-certifying facilities, based upon analysis of self-certification data. Selective follow-up may include GIS imaging, aerial photography, phone calls, inspections and enforcement. Selective follow-up will not based upon a random sample.**	**8/09**	**12/09**
Post-certification Inspections	**Inspections at facilities to establish whether sector performance measures (and other measures) have changed since the baseline. Inspection data also used to cross-check self-certification data at inspected facilities.**	**9/09**	**11/09**

	Facilities selected at random from the entire universe of facilities, based upon sample design from analytical methodology. If resources allow, this project may collect representative samples from sub-populations (e.g., to compare the performance of certifiers to non-certifiers). IDEM recognizes that analytical challenges are presented by such an approach. Such challenges will be addressed in the analytical methodology, and the approach will be reflected in an amended QAPP.		
Data Analysis	**Analysis of baseline, self-certification, and post-certification data to understand change in facility performance and overall outcomes of interest. Assessment of project efficiency.**	**2/10**	**9/10**
Reporting to EPA	**Reporting shall include quarterly, annual and final reports**	**12/06**	**12/10**

Appendix B

Core ERP Descriptors

Core ERP Descriptors

Table 1: General Information about this Report

State Reporting	**Indiana**
Lead Agency Implementing ERP	**Department of Environmental Management**
ERP Sector/Group	**Auto Salvage**
Types of Data Included in this Report and Year Data Collected [Mark an "X" for all options that apply]	☒ Baseline 2007 x Self-Certification 2009 x Post-Certification Inspection 2009
Date of This Report	**December 29, 2010**
Status of Results (Draft or Final)	**Final**
Revision Number of this Document (first version of this document submitted should be indicated by #1; if there are subsequent revisions of the document submitted, they should be numbered sequentially)	**1**
Individual Reporting Who Can be Contacted with Questions about Data Reported, including: Name, Organization, Phone Number, Email Address	**Theresa Bordenkecher** **Indiana Department of Environmental Management** **317.234.6961** **tbordenk@idem.in.gov**

Table 2: Core Descriptors of the ERP

Descriptor Name and Description	Info Reported by State
UNIVERSE (i.e., population of facilities eligible for ERP)	
1. Universe definition (who's in, who's out?) What characteristics define the group of facilities that are eligible for and/or required to submit self-certification forms in your ERP?	The universe consists of all businesses holding an Indiana Bureau of Motor Vehicle (BMV) Salvage Motor Vehicle Business License who acquire salvage motor vehicles, dismantle these vehicles for sale or reuse of parts or sale of recyclable materials, and then dispose of recyclable materials to a scrap processor or other appropriate facility.
2. Geographic location of your universe Is your ERP statewide? [Yes/No] If no, please describe how it is targeted. If it has changed from prior years, please explain.	Yes, this ERP is statewide.
3. Universe size # of facilities in universe at the point in time at which the state has determined that the most recent certification period has closed.	548

Descriptor Name and Description	Info Reported by State
4. Confidence in universe size How confident are you that your reported universe is representative of all facilities? [Indicate one option: very confident, moderately confident, or not very confident] Why?	Moderately confident: some businesses that function as auto salvage operations do not acquire the BMV Salvage Motor Vehicle Business License and would, therefore, not be represented in our universe.
5. Key environmental concerns In approximately one paragraph, explain the key processes or aspects of facilities in this group that may impact environmental, occupational, and/or public health outcomes.	The auto salvage sector includes a large number of facilities that are not regularly inspected for environmental compliance. The human health and environmental risks associated with auto salvage operations are diverse and variable and include a broad array of physical, chemical and biological hazards. Such hazards include: • A potential for air, soil, surface water and ground water contamination resulting from improper management of solid and hazardous waste and other materials on site, including mercury switches, vehicle refrigerants, vehicle fluids, batteries, auto parts and open burning. • A potential for fires and explosions • A potential to transmit West Nile Virus and other such diseases where yard areas serve as vector-breeding grounds • A potential to contaminate drinking water sources
6. Similarity to federal requirements Briefly explain whether the requirements addressed by your ERP are the same as or more stringent than federal environmental requirements that apply to the same universe of facilities.	Our compliance requirements for relevant Hazardous Waste, Air, Water, Used Oil, and USTs are comparable to federal requirements. Our compliance requirements for Solid Waste and Waste Tires are more specific and stringent.
POLICY APPROACH	
7. Substantive scope of ERP Briefly list the environmental media and any other policy issues (such as safety and health) that your ERP intends to address. Note if your ERP is not addressing one of the media with "key environmental concerns" described in the descriptor above, or is not addressing certain media in a comprehensive way.	Our ERP focuses on compliance requirements and best management practices related to Solid Waste, Used Oil, Spills, USTs, Hazardous Waste, Waste Tires, Mercury Switches, Air , Water
8. ERP tools/ components used	Which tools are you using in your ERP? [Mark an "X" for all that apply] X Statistical measurement X Compliance assistance X Self-certification by a responsible company official X Compliance assurance and enforcement program

Descriptor Name and Description	Info Reported by State
9. Certification type (i.e., voluntary or mandatory) Is submission of the certification form mandatory for all facilities, or voluntary? If certification type has changed or is expected to change in the future, explain. If certification is mandatory, but responses to some questions on the certification form are voluntary, explain.	Voluntary
10. Certification motivators If certification is voluntary, identify motivators used to increase certification rate (both incentives for certifying and disincentives against not certifying).	Certifiers are eligible to be recognized as an "Indiana Clean Yard"
11. ERP's interface with regulatory structure Explain the extent to which your ERP integrates with or replaces key aspects of the regulatory structure in your state. For example: • Does certification replace permits or a notification requirement? Does it help facilities meet a training requirement? • Do your inspections count toward inspection obligations your state has with regard to EPA-delegated programs? • Does your ERP address no regulatory issues at all?	We plan to use ERP to expand the auto salvage program from a complaint-driven approach with inspections tailored to the nature of the complaint to a proactive multi-media outreach effort.
12. Permanence of ERP Is your ERP a pilot or a permanent program? If pilot, please describe your future plans.	This is a pilot program. Further use of ERP will in part be determined by the outcome of this project.
13. External stakeholder involvement approach Please describe the external stakeholders that have been involved in developing and/or implementing the ERP approach, and identify the activities they've been involved in.	The Indiana Auto Salvage Recycler's Association has been involved in this project. Trade association members have had some involvement in developing our approach and assisted us in implementation by participating in workshops. Association members and an industry leader also provided feedback on our workbook and checklist. An industry leader appears in the DVD we developed for this program.
MEASUREMENT APPROACH	
14. List of EBPIs Provide list of EBPIs, identifying voluntary versus compliance-related EBPIs and identifying the corresponding media category [Indicate all that apply: air, water, solid waste, hazardous waste, USTs, health, safety, other]. Also please note any changes to EBPIs from prior years.	1. Is there evidence of open burning? (Compliance, Air) 2. Are refrigerants being discharged to the atmosphere? (Compliance, Air) 3. Is there evidence of spills or releases of fluids? (Compliance, Solid Waste and Used Oil) 4. Does the facility remove mercury-containing switches from vehicles? (Compliance, Universal Waste, Mercury) 5. Are containers storing used oil in good condition? (Compliance, Solid Waste and Used Oil) 6. Is there evidence of open dumping of debris? (Compliance, Solid Waste)

Descriptor Name and Description	Info Reported by State
	7. Is there evidence of open dumping of waste tires? (Compliance, Solid Waste, Tires) 8. Has the facility submitted a Notice of Intent (NOI) for Storm Water Rule 6? (Compliance, Water) 9. Has the facility developed a Storm Water Pollution Prevention Plan? (Compliance, Water) 10. Has the facility submitted the required storm water sample results? (Compliance, Water)
15. EBPI selection approach Were your EBPIs selected because you feel they are the most important issues in the sector? [Yes/No] If no, please explain your process of selecting EBPIs.	Yes
16. Random sample approach Did you take a simple random sample of the entire universe of facilities for all rounds of random inspections being reported? [Yes/No] If no, or if there are any other unusual issues associated with your random samples or with your analysis of them, please explain.	Yes
17. Random sample size What was the total sample size for each round of random inspections?	48 for first round; 50 for second round
18. Data collector skills/training Describe skill level and training of the individuals who collected data during the random facility visits.	Data were collected by Industrial Waste inspectors who were provided media-specific training and data collection training prior to each round of inspections. Inspectors used tablet computers with decision rules to ensure quality.

Descriptor Name and Description	Info Reported by State
19. Data entry approach If using web-based certification and another option, please provide the percentage of certifications that were submitted online.	Form of data submission/data entry for inspection data: (Mark an "X" for all that apply) X Electronic field collection Scanning of paper forms Manual data entry of paper forms Other (specify)_____ Form of data submission/data entry for certification data? (Mark an "X" for all that apply) Web-based Scanning of paper forms X Manual data entry of paper forms Other (specify) no certifications received on-line, this was not an option we provided
MISCELLANEOUS DESCRIPTORS	
20. Timeframe of key ERP activities • Year for each round of random inspections to date in your ERP • Year of each round of certification to date • Are there any timing issues that have come up in your ERP that would impact how your data should be interpreted?	2007, baseline random inspections 2009, facility certification 2009, post-certification random inspections Facility certification was delayed due to internal delays in developing outreach materials.
21. External factors influencing ERP Are there any factors outside the ERP that may affect the universe of facilities and/or impact how data should be interpreted, how the ERP was implemented, or the potential environmental impact of ERP?	In late 2008, scrap metal prices dropped; during the post-certification inspections (2009) some salvage businesses mentioned that they were stock-piling metal/cars and waiting for prices to increase. During the post-certification inspections, some facilities reported a decline in business; a couple of facilities also mentioned decreasing staff size in response to the economic downturn. Increased inventory may have led to increased compliance issues. Decreased business and shrinking staff sizes may have resulted in facilities being less able to deal with compliance issues.
22. Changes to ERP since the last ERP cycle If not discussed already, briefly describe any important changes in your ERP since the last ERP cycle. For instance, describe important changes to regulatory requirements, certification type, universe, EBPIs, etc.	Not applicable

Appendix C

Detailed List of Stakeholders

Project Stakeholders

Many stakeholders, both internal and external to IDEM contributed to this project. Because of the duration of this project and the change in project managers, the list below may not be complete.

Rosemary Cantwell	IDEM, Office of Land Quality, Industrial Waste
Theresa Bordenkecher	IDEM, Office of Land Quality, Industrial Waste
Tracy Barnes	IDEM, Office of Land Quality, Industrial Waste
Mark Espich	IDEM, Office of Land Quality, Industrial Waste
Lori Freeman	IDEM, Office of Land Quality, Industrial Waste
Chris Halloran	IDEM, Office of Land Quality, Industrial Waste
Dorel Hunt	IDEM, Office of Land Quality, Industrial Waste
Anne Kominowski	IDEM, Office of Land Quality, Industrial Waste
Chris Lowell	IDEM, Office of Land Quality, Industrial Waste
Alan Minne	IDEM, Office of Land Quality, Industrial Waste
Theresa Pichtel	IDEM, Office of Land Quality, Industrial Waste
George Ritchotte	IDEM, Office of Land Quality, Industrial Waste
Lisa Smith	IDEM, Office of Land Quality, Industrial Waste
Gary Romesser	IDEM, Office of Land Quality, Industrial Waste
Alison Beumer	IDEM, Office of Pollution Prevention & Technical Assistance
Stacey Pfeffer	IDEM, Office of Pollution Prevention & Technical Assistance
Hani Sharaya	IDEM, Office of Pollution Prevention & Technical Assistance
Mark Amick	IDEM, Office of Pollution Prevention & Technical Assistance
Kevin Bump	IDEM, Office of External Affairs
Oscar Meza	IDEM, Office of External Affairs
Barry Sneed	IDEM, Office of External Affairs
Brent Weisheit	IDEM, Office of External Affairs
Rich Ligman	IDEM, Office of Land Quality, Finance and Operations
Jeff Moody	IDEM, Office of Land Quality, Science Services
Diane Osborn	IDEM, Office of Land Quality, Science Services
Greg Overtoom	IDEM, Office of Land Quality, Science Services
Randy Braun	IDEM, Office of Water Quality
Megan Nagle	IDEM, Office of Water Quality
Phil Perry	IDEM, Office of Air Quality
Herm Carney	IDEM, Office of Air Quality
Michelle Lechner	Automotive Recyclers of Indiana
Michael Crow	Crow Environmental
Steve Levetan	Pull-A-Part

Appendix D

Baseline Inspection Checklist

AUTO SALVAGE INSPECTION REPORT
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Inspector's Name	
Other's In Attendance:	
Time In:	
Time Out:	
Date of Inspection	
Purpose of Inspection	☐ CEI ☐ COI ☐ EFI ☒ BL ☐ SF ☐ PC ☐ Other

General Information

Facility Contact Information

1. Facility Name:

2. Location:

Street Address:
S City/State:
S Zip Code:
S County:
Mailing Address:
M City/State
M Zip Code:
M County:

3. Contact Information

Facility Contact Person:
F Phone Number:
F Fax Number:
Facility Contact Email:
Property Owner:
Facility Owner:
Owner's Phone Number:
Owner's Fax Number:
Owner Email:

Id/permit/license

1.IFRS #	
2.RCRA EPA ID #:	
3.NPDES Permit # (or exemption):	
4.Storm Water Permit #:	
5.Drinking Water PWSID #:	
6.BMV Salvage Motor Vehicle Business License ID #:	
7.BMV License Expiration Date:	
8.Other Permit	

Facility Type

1.Auto Salvage Facility:	☐ Yes ☐ No ☐ NR
2.Scrap Metal Processor:	☐ Yes ☐ No ☐ NR
3.Towing Service:	☐ Yes ☐ No ☐ NR
4.Other Facility Type:	

Crusher and Scrap Metal Info

1. Are Vehicles and/or other equipment crushed on-site?	☐ Yes ☐ No ☐ NR
2. Does the facility own the crusher?	☐ Yes ☐ No ☐ NR ☐ NA
3.Name and address of company operating the crusher (if brought on-site):	
4.Name and address of scrap metal processors where vehicles , equipment and other parts are sent for recycling (if sent off-site):	

Facility Information

1. Approximate number of vehicles processed per day/month/year?	☐ per day ☐ per month ☐ per year
2. Approximate number of vehicles currently on site?	
3. Approximate acreage of facility?	
4. Number of years the property has been utilized as an auto salvage facility?	
5.SIC Code(s):	☐ 5015 (Motor Vehicle Parts, Used) ☐ 5093 (Scrap and Waste Materials) ☐ 7549 (Automotive Services, Except Repair and Carwashes) Other
6.NAICS:	☐ 423140 (Motor Vehicle Parts (Used) Merchant Wholesalers) ☐ 423930 (Recyclable Material Merchant Wholesalers) ☐ 488410 (Motor Vehicle Towing) Other:

Waste Streams

From Vehicles	Removed?	Quantity on-site	Disposition
1. Used Oils (differential fluid, motor oil, transmission fluid, and brake fluid):	☐		
2. Fuel (Gas and Diesel):	☐		
3. Fuel Filters:	☐		
4. Lead Parts:	☐		
5. Mercury (lights, hoods, and switches):	☐		
6. Used Oil Filters:	☐		
7. Antifreeze:	☐		
8. Batteries (Lead-Acid)	☐		
9. Airbags (Sodium Azide)	☐		
10. Windshield Washer Fluid	☐		
11. Brake Shoes and Clutches (Asbestos)	☐		
12. Engines:	☐		
13. Waste Tires:	☐		

Non-vehicle Waste Streams

Non-vehicle Waste Streams	Quantity on-site	Disposition
1. PCB Capacitors:		
2. Solvents:		

3. Contaminated Soil:		
4. Paint		
5. Absorbent Materials:		
6. Shop Towels:		
7. Solid Waste (contained):		
8. Solid Waste (open dump -not contained)		
9. White Goods:		
10. Others (specify):		

Checklist

BMV					
1. Does the facility have a valid Salvage Motor Vehicle Business License?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
Fluids Management					
1. Is there evidence of spills or releases of fluids including gasoline, fuel, motor oil, antifreeze, transmission fluid, brake fluid, battery acid, power steering fluid, crank case oil, solvents and paint?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
1a. Were the spills and releases reported to IDEM upon discovery?	☐ Yes	☐ No	☐ NR		
B1. Are fluids and filters removed from vehicles prior to storing them in the yard?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
B2. Are fluids from vehicles removed over a cement pad, inside a building, using funnels, pumps, and/or drip pans?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
B3. Are vehicle batteries removed prior to storing vehicles in the yard?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
B4. Are vehicle batteries stored in a building or away from the elements such as rain or snow to prevent a release to the environment?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
B5. Is the crusher located in an impervious secondary containment unit or inside a building?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
B6. Is windshield wiper fluid removed and recycled?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
B7. Are containers storing fluids inspected weekly for rust, dents, holes, bulges, and leaks?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
B8. Do all containers of fluids, not just those subject to the used oil or hazardous waste containers, have secure (sealed tight) lids?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
B9. Are all containers of fluids, not just those subject to the used oil or hazardous waste regulations, labeled to identify its contents?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
B10. Are containers stored in a building or away from the elements such as rain and snow to prevent the deterioration of the containers and a release to the environment?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
B11. Are empty drums stored in a manner to prevent the accumulation of rain water?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
B12. Are engines, transmissions, and other vehicle parts stored in a building or away from the elements such as rain and snow to prevent releases to the environment?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
B13. Are floor drains closed or filled in where fluids are present?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
Oil					
1. Are containers and/or tanks storing used oil in good condition (free from rust, dents, holes, bulges, and leaks)?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
2. Are tanks and containers that are used to store used oil clearly labeled with the words "Used Oil"?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR

3. Does the facility burn used oil in a space heater?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
3a. Is the used oil that the facility burns generated only at that facility location or a household do-it-yourselfer?	☐ Yes	☐ No	☐ NR		
4. Is a registered transporter used for shipments of used oil?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
4a. Is 55 gallons or less of used oil transported in your own vehicles (company or employee) to either a government approved collection center or an aggregation point (owned or operated by your company)? OR Is used oil being transported and reclaimed under a contract that requires your used oil to be returned to you for re-use?	☐ Yes	☐ No	☐ NR		
5. Is the total storage capacity of on-site oil greater than 1320 gallons? Note that: • This storage capacity adds ONLY containers and/or tanks with a capacity of 55 gallons or more (i.e., small containers such as 5 gallon buckets are not added) • The total may include more than one storage location (which may need to be entered into additional information table). • "Oil" includes product oil as well as waste oil.	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
5a. Does the facility have an SPCC plan (Spill Prevention, Control, and Countermeasure Plan)?	☐ Yes	☐ No	☐ NR		
Underground Storage Tanks					
1. Are there any underground storage tanks (USTs) located on-site?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
1a. Are there USTs (greater than 100 gal) on-site which contain petroleum or a hazardous substance that have not been registered with IDEM? (Underground tanks storing fuel for heating are exempt.)	☐ Yes	☐ No	☐ NR		
Hazardous Waste Management					
1. Do you have any unknown material located on-site?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
2. Do you generate hazardous waste in quantities greater than or equal to 220 lbs/month?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
Waste Tire Management					
1. IC 13-11-2-250 "Waste tire", for purposes of IC 13-20-13 and IC 13-20-14, means a tire that is not suitable for the tire's original purpose. Does the facility have over 1,000 waste tires stored outside or over 2,000 waste tires stored inside?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
1a. Does the facility have a valid certificate of registration as a waste tire storage facility?	☐ Yes	☐ No			
See attached Waste Tire Inspection Report	☐ Yes	☐ NA			
2. Is there evidence of open dumping of waste tires on site?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
3. Are waste tires stored in a manner that poses a fire hazard (including: near a heat source, welding, torching, smoking, or under electrical power-lines)?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
4. Is water prevented from accumulating in the waste tires?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
5. Do the waste tires harbor vectors (mosquitoes, rodents, snakes, ticks) that pose a threat to human health?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
6. Does this facility ship whole waste tires off-site?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
6a. Are they delivered to one or more of the following approved locations? • a wholesaler or agent of a wholesaler • a manufacturer of tires • a facility that recycles or collects tires for delivery to a facility that	☐ Yes	☐ No	☐ NR		

recycles • a permitted final disposal facility regulated under environmental management laws • a permitted waste tire storage site • a facility operated as a waste tire cutting facility under a permit issued by the commissioner • a registered waste tire transporter or a person who operates a municipal waste collection and transportation vehicle licensed under IC 13-20-4.					
6b. Are waste tire manifests available for review and retained for at least 1 year?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
Mercury Switches					
1. Does your facility receive vehicles that contain mercury switches?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
2. Does the facility remove mercury containing switches from vehicles?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
3. Are all mercury switches and/or ABS switches that contain mercury stored in a container that complies with the universal waste regulations for transportation (i.e. End of Life Vehicle Solutions (ELVS) or other Dept. of Transportation (DOT) approved) container?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
4. Are the containers in good condition and kept closed unless adding or removing mercury containing devices?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
5. Are the containers marked as universal waste?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
6. Have any containers of mercury switches been accumulating on-site for more than 1 year (containers should be labeled with accumulation start date)?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
7. Are records of mercury switch removals maintained at the facility documenting the number of cars with switches, and the number and percentages of the switches removed)? (See Compliance Manual for further requirements)	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
8. Does the facility have appropriate safety procedures and emergency equipment where handling mercury devices (i.e. well ventilated area, containment devices, mercury spill kit)?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
9. Have employees been trained on appropriate safety and emergency procedures for removing and handling mercury switches including removing over a containment device, having a mercury spill kit on hand, and removing in a well ventilated area?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
Solid Waste Management					
1. Is there evidence of open dumping of garbage, refuse, construction debris, commercial waste, industrial waste, ash piles, contaminated soils, household waste, or other similar items?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
B1. Does the facility remove brake or clutch pads from vehicles?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
B1a. Are measures taken to eliminate asbestos exposure?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
B2. Does this facility remove air bags?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
B2a. Are measures taken to safely remove un-deployed airbags?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
Air					
1. Is there any evidence of open burning (Note: No burning is permitted except in an approved device)?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
2. Are solvents (cleaners/degreasers) used at this facility?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
2a. Are degreaser (parts washer) covers closed when not cleaning parts?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR

2b. Are waste solvent containers stored closed?	☐ Yes	☐ No	☐ NA		
3. Is there any activity generating dust or spray that crosses property lines?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
4. Is there a sweat furnace (i.e. a furnace used to reclaim aluminum from scrap metal) in use at the facility?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
5. Are there records documenting appropriate removal of refrigerants from vehicles, white goods, or other equipment? (Referred to Compliance Manual Tab 6, Pg. 4)	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
6. Are refrigerants collected in EPA approved devices? (Referred to Compliance Manual Tab 2, Pg. 2)	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
7. Are refrigerants (i.e. Freon, CFCs, etc.) being discharged to the atmosphere?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
B1. Do you remove refrigerants from vehicles prior to storing them in the yard?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
B2. Are employees trained to remove and capture refrigerants?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
B3. Do you ensure that all AC openings are sealed after evacuation to prevent leaking of residual refrigerant?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
B4. Do you ensure that collection/storage devices are not overfilled?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
Water					
1. Are there any existing or planned land disturbing activities that exceed one acre at the facility?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
2. Does the facility have a permit for land disturbing activities as referenced under 327 IAC 15-5?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
3. Is there extensive soil buildup on roads around the facility?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
4. Does the facility have any construction or filling activities in a potential floodway?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
5. Is the facility (or any part) located within a potential designated wetland area?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
6. Is the facility's drinking water supplied by a municipal system (private or public)?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
6a. Does the facility have a PWS ID Number?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
7. Has the facility submitted a Notice of Intent (NOI) for Storm Water Rule 6?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
7a. Does the NOI accurately reflect the storm water conditions (i.e. location of outfalls and drainage areas) at the facility?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
8. Has the facility submitted a Storm Water Pollution Prevention Plan (SWP3) Certification Checklist signed by a qualified professional (i.e. trained and experienced in storm water treatment techniques) to the Department? (See Compliance Manual for further details)	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
9. Has the facility developed a Storm Water Pollution Prevention Plan (SWP3)?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
10. Has the facility implemented good housekeeping measures described within the SWP3 at the site to ensure that contaminants from auto salvage activities aren't exposed to storm water?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
11. Does the facility document quarterly inspections of storm water run-off conveyances looking for oil sheens, discoloration, dead aquatic life, and sediment buildup in nearby ditches and/or streams?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
12. Has the facility documented annual employee training on the components and goals of the SWP3? (i.e. spill response, good housekeeping, and	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR

materials management)					
13. Has the facility submitted storm water sample results of the required eight (8) parameters?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
13a. Do sample results indicate any contamination of the eight (8) parameters?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
13b. Did the facility identify the source of the contaminate(s) and eliminate them?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
Miscellaneous					
1. Were any potential workplace safety issues observed pertaining to IOSHA (i.e. loading and moving vehicles in an unsafe manner, stacking cars, waste, or parts too high, not wearing respiratory, eye or other protection when needed?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR
2. Does the facility have permanent or handheld radiation equipment on-site?	☐ Yes	☐ No	☐ NI	☐ NA	☐ NR

Summary

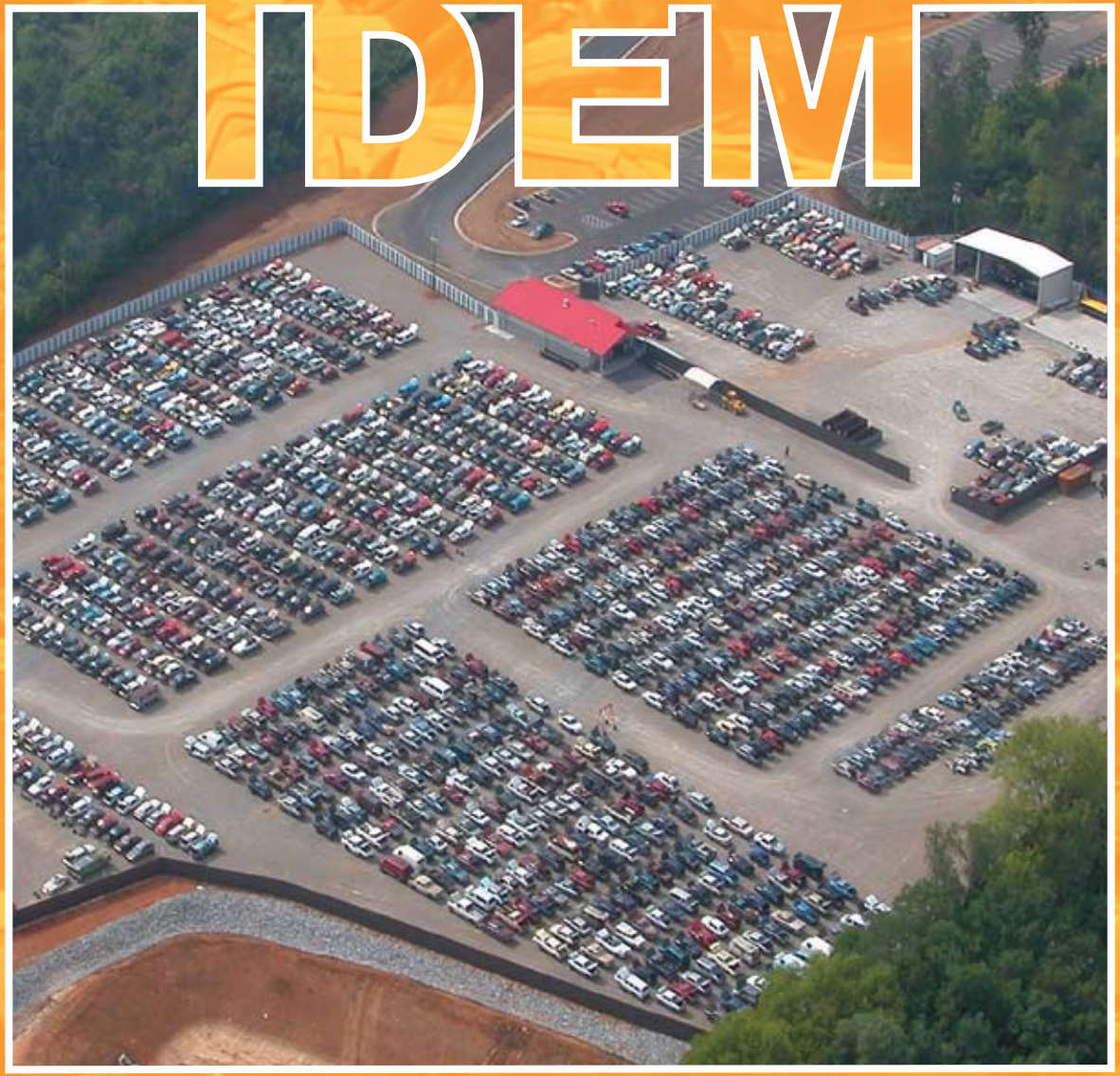
Description of Violations and Further Actions

Appendix E

Auto Salvage Recyclers Workbook

Indiana Department of Environmental Management

IDEM



Auto Salvage Recyclers

ENVIRONMENTAL SELF-AUDIT WORKBOOK AND CHECKLIST

For the Auto Salvage Recyclers Certification Program

Auto Salvage Recyclers

ENVIRONMENTAL SELF-AUDIT WORKBOOK AND CHECKLIST

Prepared by
Indiana Department of Environmental Management
Office of Land Quality
Industrial Waste Compliance

Indiana Department of Environmental Management
OLQ - Industrial Waste Compliance
Auto Salvage Recyclers Certification Program
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www.idem.IN.gov/4993.htm

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- 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 Pollution Prevention and Technical Assistance
  - 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 #1
  - Office of External Affairs

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.

In order to improve environmental protection, the Auto Salvage Recyclers Certification Program was developed by the Indiana Department of Environmental Management (IDEM). 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, participation in this program can allow you the opportunity to return to compliance without enforcement penalty. Additionally, auto salvage recycling businesses participating in the Auto Salvage Recyclers Certification Program may be eligible for Indiana Clean Yard Certification if they are in compliance with all regulations.

Time frame

If you choose to participate, we would like you to submit your completed environmental self-audit checklist, any necessary return-to-compliance (RTC) forms, and the certification statement, within 60 days of receiving this workbook. These forms are located in the appendix of this guide.

Participation

Participation in the program is voluntary. However, all auto salvage recycling facilities should strongly consider participating in the program to take advantage of the opportunity to improve their day-to-day business practices and become better stewards of the environment. Specific advantages of participation include:

- reducing inspection priority;
- making you better prepared for a complaint inspection;
- being placed on a public participation list as an environmental participant;
- the possibility of being certified as an Indiana Clean Yard by IDEM. For more information on this program, see the following section titled "Clean Yard Certification". You may also call IDEM at (800) 988-7901 or (317) 232-8172 or visit our Web site at www.idem.IN.gov for more information;
- priority in receiving information and education on methods of complying with environmental regulations that apply to auto salvage facilities;
- priority in receiving free, confidential technical assistance from IDEM's *Office of Pollution Prevention and Technical Assistance* (OPPTA) to comply with environmental regulations and implement best management practices that could result in financial savings; and,
- priority in receiving educational and promotional materials.

Participation in this certification program does not imply that your business will be exempt from random inspections, or inspections prompted by complaints. However, participation in this program 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.

To assist you in participating in this program, we have included a DVD. This instructional DVD is located on the last page of this workbook. Although use of this DVD is not essential, it is designed to walk you through the information contained in this workbook and may help answer questions you have.

If you would like free, confidential, environmental assistance with this program, 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.

Not Operating as an Auto Salvage Facility?

If there are no active auto salvage yard operations at your facility address, simply complete, sign, and send the non-applicability statement form to the Indiana Department of Environmental Management (IDEM). The non-applicability statement form can be found in the appendix of this workbook on page 57. Please note that all industrial and commercial facilities in the State of Indiana must comply with all applicable environmental regulations, whether or not they are part of this program or any other certification program.

Clean Yard Certification

Eligibility for certification as an Indiana Clean Yard by IDEM is based on your completion of the environmental self-audit checklist and determination that your facility complies with all environmental regulations, holds necessary licenses and approvals, recycles most materials, and is in good standing with all IDEM programs. For more information, call IDEM at (800) 988-7901 or (317) 232-8172 or visit Auto Salvage Web site at www.idem.IN.gov/4993.htm .

INSTRUCTIONS

To participate in the Auto Salvage Recycler Program, you will need to complete the environmental self-audit checklist, all necessary return-to-compliance (RTC) forms, the certification statement, and submit them to the Indiana Department of Environmental Management (IDEM). These steps are outlined below.

1. Complete the environmental self-audit checklist form.

The environmental self-audit checklist form is included in the appendix of this guide. You should use Sections A through J of this guide to help you complete the form. These sections of the workbook correspond with the sections of the checklist and contain explanations that will help you answer the checklist questions. See the box below for an example of questions that are used in this workbook.

1 **Do you crush vehicles at your facility?**

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.

2. Complete any necessary return-to-compliance (RTC) plan form(s).

On the environmental self-audit checklist form, you will select "YES" or "NO" for each question. You will notice that sometimes the "YES" or "NO" is followed by "Submit RTC". For each of your answers that include the note "Submit RTC", you will need to complete and submit a separate return-to-compliance plan form (RTC). Copy and use the RTC plan form located in the appendix of this guide as needed.

3. Complete the certification statement form.

After you have completed the environmental self-audit checklist and all necessary RTC forms, please complete and sign the certification statement.

4. Mail the forms.

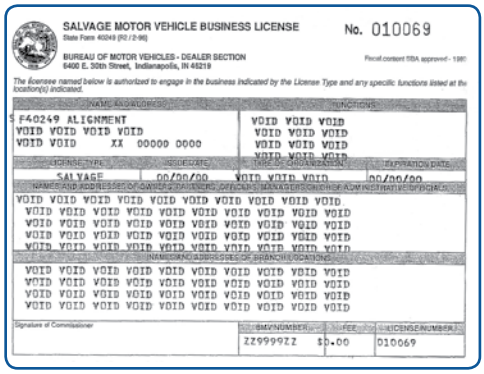
This is the final step. Take all of your completed forms (the environmental self-audit checklist, all necessary RTC forms, and the certification statement) and mail them together to the address provided on the forms.

If you have questions about any of these forms, contact IDEM's *Industrial Waste Compliance Section* at (800) 451-6027 ext. 8-3103 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.IN.gov/icpr/webfile/formsdiv/40248.pdf or in *Appendix: Auto Salvage License.*



SALVAGE MOTOR VEHICLE BUSINESS LICENSE No. 010069

BUREAU OF MOTOR VEHICLES - DEALER SECTION
6400 E. 30th Street, Indianapolis, IN 46219

F40249 ALIGNMENT
VOID VOID VOID VOID
VOID VOID XX 00000 0000

SALVAGE 00/00/00 VOID VOID VOID 00/00/00

VOID VOID VOID VOID VOID VOID VOID VOID VOID VOID

VOID VOID VOID VOID VOID VOID VOID VOID VOID VOID

ZZ9999ZZ $0.00 010069

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.

1 Do you have a valid Indiana Salvage Motor Vehicle Business License?

A license is required for disposal facilities, used parts dealers, or automotive salvage rebuilders that do 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 Motor Vehicle Business License, you will need to submit a return to compliance plan form. To be in compliance, you will need to complete the license application form and submit the form with a $10 application fee to:

Indiana Bureau of Motor Vehicles
Dealer Section
6400 E. 30th Street,
Indianapolis, IN 46219.

Include a copy of your valid Indiana Salvage Motor Vehicle Business License with all forms submitted for IDEM's *Auto Salvage Recycler Certification Program.*

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.

Fluid pooling beneath stored vehicles.

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

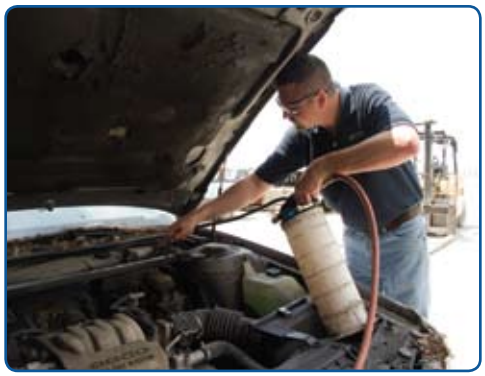
Fluids can include gasoline, fuel, motor oil, antifreeze, transmission fluid, brake fluid, battery acid, power steering fluid, crank case oil, solvents, paints, etc. If you have a spill or release on your property, you will need to submit an RTC plan form. To be in compliance, you will need to immediately clean-up, remove, and contain all spills and contaminated soil/debris resulting from spills and releases.

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

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.

For guidance in making a waste determination, visit www.idem.IN.gov/catalog/guidance/la-062-gg.pdf , www.idem.IN.gov/5043.htm , www.idem.IN.gov/4108.htm or call IDEM toll free at (800) 988-7901 or (317) 232-8172.

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 ext. 8-3103 or (317) 234-6951.



Removal of fluids prior to storing the vehicle.

1a 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.

2 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.

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.

3 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.

Proper battery storage inside a trailer.

4 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 help lessen the chances of a potentially costly clean-up in the event of an accidental release.

Proper battery storage inside a building in secondary containment.

Batteries stored inside with secondary containment.

Auto recycler crushing operation.

5 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.

Crusher placed in secondary containment.

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.

Windshield wiper fluid storage.

6 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.

7 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.

Drums that are rusted and dented.

8 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.

Properly closed parts washer.

Properly closed parts washer.

Properly labeled and stored antifreeze.

9 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.

Properly labeled and stored fluids.

10 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.

Properly labeled and stored fluids in stationary secondary containment.

11 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.

Open containers collecting rainwater.

12 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.

Drums capped and stored on their sides.

13 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.

Parts stored in racks inside building.

Filled in floor drain.

C. OIL

Improperly stored used oil.

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.

Labeled drum of used oil.

1 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. If your containers and/or tanks are not in good condition, you will need to submit an RTC plan form. To be in compliance, you will need to immediately replace/repair the 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. Submit to IDEM documentation of proper used oil storage (e.g., photos).

Used oil label.

2 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 submit an RTC plan form. 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". Submit to IDEM documentation of labeling (e.g., photographs).

Used oil storage tank in secondary containment.

3 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 half (0.5) million BTUs/hour and that the combustion gases from the heater are vented to the ambient air.

Space heater with labeled used oil storage tank.

3a Do you burn used oil generated only by your facility or by a household do-it-yourselfer?

If you burn oil generated by another business facility (except for household do-it-yourselfers), you will need to submit an RTC plan form. To be in compliance, you will need to immediately cease the use/acceptance of used oil generated at other locations. Submit to IDEM documentation that describes the source of used oil burned at your facility.

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.

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.

4 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 transporters at www.idem.IN.gov/files/hw_notifier_used_oil.pdf .

4a 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 must submit an RTC plan form. To be in compliance, 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.

Submit to IDEM proof of the use of a registered transporter (unless you transport fifty-five (55) gallons or less) and approved location.

5 Do you have a total on site oil storage capacity 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 you currently have.

If "NO", skip question 5a.

Calculate the oil storage capacity you have on site. This will include both product oil and used oil. 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.*

Oil storage capacity exceeding 1320 gallons.

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 submit an RTC plan form. To be in compliance, you will need to develop an SPCC Plan. Submit to IDEM documentation of your SPCC Plan. Alternately, you may reduce the total on site oil capacity at your facility.

For more information on developing a SPCC plan, visit www.epa.gov/oem/content/spcc/index.htm , www.epa.gov/region5oil/plan/spcc.html or call the U.S. EPA at (312) 866-7187

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.

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.

1 Does your facility have any underground storage tanks (USTs)?

If "NO", skip question 1a.

1a Do you have petroleum or hazardous substance containing UST(s) (one hundred ten (110) gallons or more) that have not been registered with IDEM?

Vent lines for a UST.

Note: Underground storage tanks storing fuel for heating are exempt.

If you have a UST(s) that has not been registered with IDEM, you will need to submit an RTC plan form. To be in compliance, you will need to contact IDEM's *Office of Land Quality - Underground Storage Tank Section* toll free at (800) 451-6027 ext. 234-4112 to register or close your tank.

For a registration application, visit www.IN.gov/icpr/webfile/formsdiv/45223.doc , or the *Appendix: Underground Storage Tank* of this guide.

Fill pad for a UST.

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.

1 Does your facility have any unknown materials on site?

If you have unknown materials, you will need to submit an RTC plan form. To be in compliance, you will need to identify (e.g., conduct a waste determination) any unknown materials and determine if they are hazardous. Submit to IDEM documentation and/or analytical results that support your determination. In addition, submit documentation of proper recycling or disposal of the material.

Unlabeled group of drums with unknown contents.

2 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 - Industrial Waste Section* toll free at (800) 451-6027 ext. 234-6951 or (317) 234-6951 to obtain a U.S. EPA ID number and for further guidance on how to properly manage the waste.

A half full 55 gallon drum is about 220 pounds.

For guidance in making a waste determination, visit www.idem.IN.gov/catalog/guidance/la-062-gg.pdf , www.idem.IN.gov/5043.htm , www.idem.IN.gov/4108.htm 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.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

Date:

(SAMPLE REGISTRATION LETTER)

WASTE TIRE STORAGE SITE REGISTRATION

In accordance with Indiana's Solid Waste Management Board Rule 329 IAC 15-3-3, and the information provided by your application for a waste tire storage registration:

Facility Contact Person's Name
Facility Name
Facility Street Address
City, State, Zip Code

is hereby issued registration number **[060-S-00###]**, subject to the following conditions:

1. Waste tires may only be accepted from a registered waste tire transporter or a person who is not required to be registered as a transporter under 329 IAC 15-4.
2. A shipment of waste tires by a registered waste tire transporter will not be accepted if it is not accompanied by a manifest containing information required by 329 IAC 15-4-13.
3. Waste tire storage is restricted to a maximum of [####], whether they are in shredded tire pieces, whole tires, or a combination of both, identified by storage area permanent corner boundary markers.
4. Disposal of waste tire material from this operation must be at a Department of Environmental Management approved facility.

This registration is valid for a period of five (5) years, provided the registrant maintains compliance with 329 IAC 15-3 and 15-5, and will expire on **Month 1, 20##.** A renewal application for this registration must be submitted sixty (60) days prior to the expiration date. This registration is subject to administrative review as described in the attached Notice f Decision. If you have any questions, please contact Ms. Debby Baker, Waste Tire Program Director, at 317/232-0066.

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.

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

If "NO", skip question 1a.

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.

1a 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 submit an RTC plan form as described in question 2.

2 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 submit an RTC plan form. To be in compliance, you will need to collect and remove all waste tires presently on site and haul them to a state approved solid waste or tire management facility or recycling 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. Submit to IDEM the number of tires removed and documentation showing proper disposal or provide a reasonable schedule for cleanup and disposal. In the future, collect waste tires in an enclosed area or covered container and dispose of the waste tires within six months.

Open dump of tires.

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) 233-5341 or (317) 234-2585.

3 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 submit an RTC plan form. To be in compliance, you will need to store waste tires in a manner that does not pose a fire hazard. Submit to IDEM documentation showing proper storage of tires (e.g., photos).

Tire fire due to storing tires in an unsafe manner.

Open dump of tires.

Tires stored improperly in standing water.

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

Water accumulation may be prevented by storing tires inside or under cover, by altering the tires so that they cannot accumulate water, or other methods.

If you do not prevent water from accumulating in your waste tires, you will need to submit an RTC plan form. To be in compliance, you will need to prevent water from accumulating in tires by cutting or drilling holes, and/or by storing in a building, enclosed area or covered container. Submit to IDEM documentation that you have ensured that no water can accumulate in your waste tires (e.g., photos).

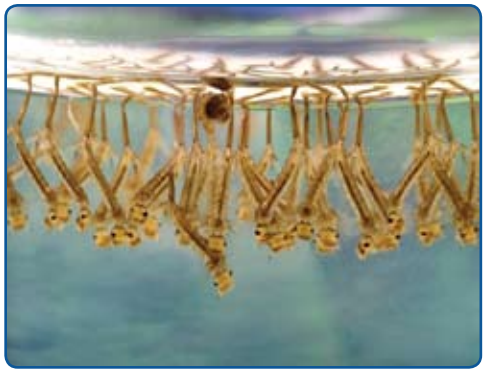
Mosquito larvae in tire.
(Marion County Department of Health)

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

A vector is a mosquito, rodent, flea, tick or other animal that can carry disease to humans.

If your waste tires have the potential to harbor vectors, you will need to submit an RTC plan form. To be in compliance, 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).

Submit to IDEM documentation that your waste tires are not vector attractants (e.g., photos, receipts).



Mosquito larvae.
(Indiana State Department of Health)

6 Do you ship whole waste tires off-site?

If "NO", skip question 7.

7 Are your tires delivered to one or more of the approved locations:

- a wholesaler or agent of a wholesaler;
- a facility that recycles or collects tires for delivery to a facility that recycles;
- a permitted final disposal facility regulated under environmental management laws;
- a permitted waste tire storage site;
- a facility operated as a waste tire cutting facility under a permit issued by the commissioner; or
- a registered waste tire transporter or a person who operates a municipal waste collection and transportation vehicle licensed under IC 13-20-4.

If your tires are not taken to an approved location, you will need to submit an RTC plan form. To be in compliance, you will need to immediately cease transport to all unapproved facilities. Begin transporting all whole waste tires to an approved facility. Submit to IDEM proof of transport to an approved facility (e.g., receipts, contract).

Shredded waste tires.

For a list of registered transporters, processors, or storage sites, please visit www.idem.IN.gov/files/wt_transporters.pdf or www.idem.IN.gov/files/wt_processors_and_storage.pdf .

Open dump of tires.

G. MERCURY SWITCHES

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

Mercury switches are found in the hood and trunk light switches of some vehicles. When cars containing these switches are crushed or when the metal is remelted, the mercury can be released into the environment and eventually make its way to 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. The information in this section will guide you through the steps necessary to accomplish this safely.

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. 3-1655 or (317) 233-1655 and see *Appendix: Mercury Switch* of this guide. In order to collect a bounty you must participate in the End of Life Vehicle Solutions (ELVS) program. All auto salvage yards should have received a mercury switch recycling container and additional materials from the ELVS program. If you did not receive these, please contact the ELVS program or IDEM.

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

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.

ELVS bucket properly labeled with the universal waste label.

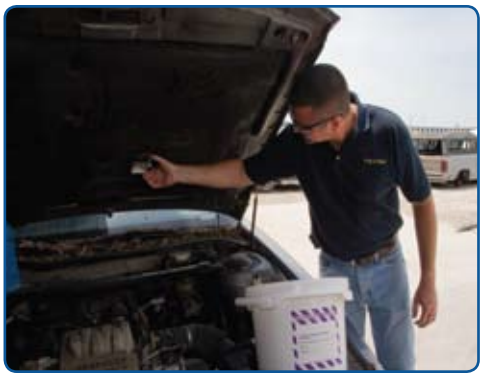
1 Do you receive vehicles that contain mercury switches at your facility?

For a list of vehicles that contain mercury switches, see www.elvsolutions.org/attachment_a.htm .

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

2 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, remove mercury switches from all vehicles, and submit an RTC plan form. See below for additional information.



Removal of mercury switches is required by Indiana law.

3 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 submit an RTC plan form. To be in compliance, 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. ELVS will then ship you a new bucket. Submit documentation of proper removal and disposal to IDEM (e.g., photos, receipts).

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.

Improper mercury switch storage.

To obtain a bucket for mercury switches, contact ELVS at www.elvsolutions.org/contact.html using the form provided. If you have questions, call IDEM at (800) 451-6027, ext. 3-1655 or (317) 233-1655.

ELVS universal waste bucket.

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

If you do not store your containers closed and maintain them in good condition, you will need to submit an RTC plan form. To be in compliance, you will need to store your containers closed and maintain the containers in good condition. Submit to IDEM documentation of proper storage (e.g., photos).

5 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".

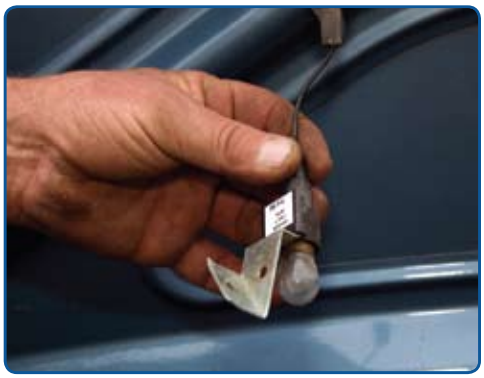
If you do not label your containers as universal waste, you will need to submit an RTC plan form. To be in compliance, you will need to label your container (e.g., the pre-printed label provided in the ELVS bucket). Ensure that the label is completely filled out with the accumulation start date and shipper information. Submit to IDEM documentation of proper labeling (e.g., photos).

Correct way to fill out a label for mercury switches.

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.

If you have a container of mercury switches that has been on site for more than one year, you will need to submit an RTC plan form. Mercury switches and other universal waste may only be stored on site for a maximum of 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). Submit to IDEM documentation of disposal and plans to ensure removal at appropriate times (e.g., shipping receipts).



Removal of a light containing a mercury switch.

7 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, you will need to submit an RTC plan form. To be in compliance, you will need to immediately begin maintaining records. Records should document the number of vehicles processed at your facility, the number of vehicles that contained switches, and the total number of switches collected. Submit to IDEM documentation of record keeping.

Record keeping is important to obtain the mercury switch bounty. For a copy of the claim form, see www.IN.gov/icpr/webfile/formsdiv/53238.pdf or *Appendix: Mercury Switch* of this guide.

CLAIM FOR PAYMENT FOR MERCURY SWITCHES FROM END-OF-LIFE VEHICLES

Mercury switch bounty claim form.

Mercury spill kit.

A mercury spill kit typically includes safety glasses, disposable gloves, mercury absorbing sponges, and mercury absorbing powder. For examples of mercury kits, visit https://decs.nhgl.med.navy.mil/DIS60/sec6b.htm .

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

These procedures and equipment can include handling mercury in a well-ventilated area, using containment devices, and having a mercury spill kit.

If you do not use appropriate safety procedures and have emergency equipment on site, you will need to submit an RTC plan form. To be in compliance, you will need to develop safety procedures for handling mercury containing devices at your facility and obtain emergency equipment capable of handling a mercury spill. Submit to IDEM documentation of compliance (e.g., a copy of your safety procedures, receipts, and photos).

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

These procedures can include removing mercury over a containment device, having a mercury spill kit on hand, and removing mercury in a well-vented area.

If you have not trained your employees on appropriate safety and emergency procedures for removing and handling mercury switches, you will need to submit an RTC plan form. To be in compliance, you will need to train your workers on safety and emergency procedures for mercury switch handling. Submit to IDEM documentation of training (e.g., training log).

For an example of a training log, see *Appendix: Mercury Switch* 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.

Illegal open dumping 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, commercial waste, industrial waste, ash piles, contaminated soils, household waste, or other similar items.

Illegal open dumping of solid waste.

Open dumping of materials is prohibited by state law!

If you open dump, you will need to submit an RTC plan form. To be in compliance, you will need to immediately cease all open dumping of solid waste. Immediately remove any solid waste from the facility and take it to a state-approved solid waste management facility or recycling facility. Submit to IDEM documentation of arrangements to have solid waste removed by a solid waste hauler and documentation of the removal of solid waste. In the future, place all solid waste in a container (e.g., dumpster, trash can, roll-off) for proper management and disposal.

Proper solid waste disposal container.

Brake pad removal.

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

If "NO", skip question 2a.

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."

Non-deployed airbag removal.

3 Do you remove air bags at your facility?

If "NO", skip question 3a.

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.

For information on the health effects of sodium azide, visit the Centers for Disease Control Web site at www.bt.cdc.gov/agent/sodiumazide/basics/pdf/sodiumazide-facts.pdf .

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.

Illegal open burning.

1 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 burn any materials, you will need to submit an RTC plan form. To be in compliance, you will need to immediately cease all open burning. Clean the burn area and remove any solid waste and ash to a state-approved solid waste management facility or recycling facility, as appropriate. Submit to IDEM documentation of arrangements to have solid waste picked up by a solid waste hauler (e.g., receipts).

For more information about open burning, visit the IDEM Web site at www.idem.IN.gov/4980.htm .

Illegal open burning in a barrel.

2 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.

Common solvents.

Properly closed parts washer.

2a 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. If not, you will need to submit an RTC plan form. To be in compliance, you will need to close all containers when not in use and submit documentation to IDEM (e.g., photos).

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/4981.htm .

3 Do you generate any particulate matter (i.e., 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.

Construction generated dust crossing property lines.

If there is visible particulate matter crossing the property line, you must submit an RTC plan form that indicates and documents that you have contacted IDEM's *Office of Air Quality* for guidance on how to prevent fugitive dust and emission violations. To obtain information, call IDEM's *Air Compliance Section* 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/4981.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 submit an RTC plan form. Submit to IDEM documentation that you have contacted 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.

More information is available on the IDEM Web site at www.idem.IN.gov/4815.htm .

For the U.S. EPA's *Sweat Furnace Operations Brochure*, visit www.epa.gov/ttn/atw/alum2nd/secalum.pdf or see *Appendix: Air* for information on sweat furnace operations.

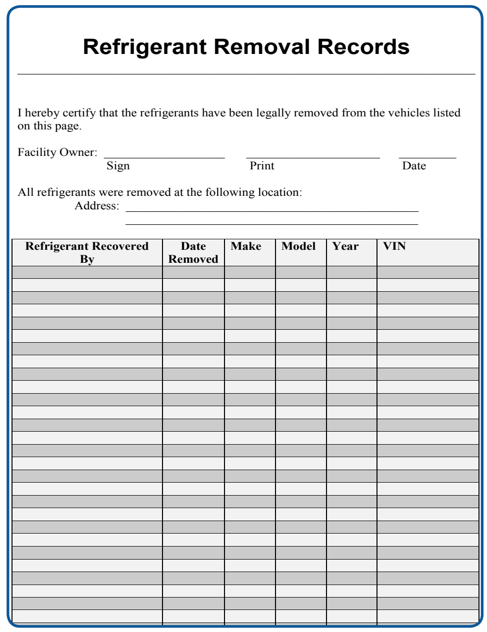
Sweat furnace.

5 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 submit an RTC plan form. To be in compliance, you will need to maintain records with the following information for every vehicle brought to your site:

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

You will need to maintain and submit a record to IDEM. For an example of this refrigerant removal form for recordkeeping, see *Appendix: Air*.



Refrigerant Removal Records

I hereby certify that the refrigerants have been legally removed from the vehicles listed on this page.

Facility Owner: __________ Sign __________ Print __________ Date

All refrigerants were removed at the following location:
Address: __________

Refrigerant Recovered By	Date Removed	Make	Model	Year	VIN

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/ozone/title6/609/ .

Refrigerant recovery device.

For a list of equipment that can be certified, visit www.epa.gov/ozone/title6/609/technicians/appequip.html or call the Stratospheric Ozone Hotline at (800) 296-1996.

For a copy of the form, visit www.epa.gov/ozone/title6/608/608fact.html#ownercert .

6 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 shall take the form of a statement signed by the owner of the equipment or another responsible officer and setting forth:

- 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 your equipment is not certified by the U.S. EPA, you will need to submit an RTC plan form that indicates and documents that you have called the Stratospheric Ozone Hotline at (800) 296-1996 and certified your equipment.

7 Do you release refrigerants into the atmosphere?

Refrigerants cannot be released into the atmosphere. If you do not currently collect refrigerants, you will need to submit an RTC plan form. To be in compliance, you will need to cease all releases of refrigerants to the air. Do not cut or puncture refrigerant lines.

Ensure that all refrigerants are collected and contained in an U.S. EPA-approved device. Submit to IDEM proof that refrigerants are collected in an approved manner (e.g., a receipt for equipment purchase).

8 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.

Refrigerant removal.

9 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. For training and certification programs, call the Stratospheric Ozone Hotline (800) 296-1996 or visit U.S. EPA's Web site at www.epa.gov/ozone/title6/609/technicians/609certs.html .

For information on training and certification programs, call the Stratospheric Ozone Hotline at (800) 296-1996 or visit www.epa.gov/ozone/title6/609/technicians/609certs.html .

10 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.

11 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.

J. WATER

Environmental contamination from leaking crushed vehicles.

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.

Construction activity exceeding one acre.

For additional information about land disturbing activities, visit the storm water permits Web site at www.idem.IN.gov/4902.htm or contact IDEM's *OWQ Wetlands and Storm Water Section* at (800) 451-6027 or (317) 233-8488.

1 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) 233-8488.

Contacting IDEM will assist you with determination of your construction activity's jurisdiction in relationship to either a storm water conservation district (SWCD) or municipal separate storm sewer system (MS4) entity at the local level.

1a Does your facility have a permit for land disturbing activities as referenced under 327 IAC 15-5?

If you have determined that 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 submit a RTC plan form to IDEM.

If you have not already begun your land disturbing activities, your facility needs 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/4899.htm or contact IDEM's *OWQ - Wetlands & Storm Water Section* at (800) 451-6027 or (317) 233-8488.

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.

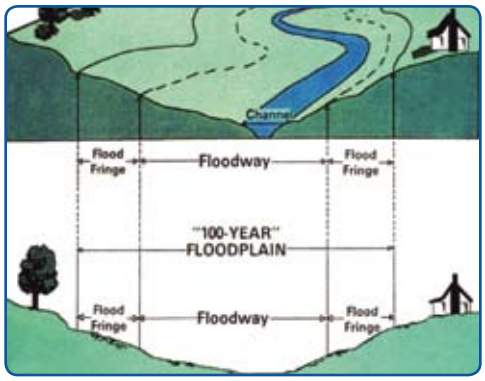
Extensive soil build-up.

2 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 tracking, circle YES and submit an RTC plan form.

If an RTC plan form is necessary, 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.



Map of floodway and floodplain.

3 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.

3a 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 submit an RTC plan form. The plan will indicate and document that you contacted the Indiana Department of Natural Resources - *Floodplain Management Section* at (877) 928-3755 or (317) 232-4160 to obtain a floodway construction permit.

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 .

4 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.

Conditions and factors that determine a wetland area are presented on the next page.

Forested wetland area.

Emergent wetland area.

For additional information about wetlands regulations, visit the IDEM Web sites at: www.idem.IN.gov/4385.htm , www.idem.IN.gov/files/howdoiknowwetland.ppt , and www.idem.IN.gov/4401.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 submit an RTC plan form that indicates and documents that you have contacted both IDEM and the U.S. Army Corps of Engineers (USACE) to obtain any necessary permits. 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).

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

If "YES", skip question 5a.

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 submit an RTC plan form that indicates and documents that you have contacted IDEM's *Drinking Water Branch* at (800) 451-6027 ext. 8-3299 or (317) 308-3299.

For additional information about drinking water, visit the IDEM *Drinking Water* Web site at www.idem.IN.gov/5097.htm .

If you have any questions about drinking water rules and regulations contact the IDEM *Drinking Water Branch* at (800) 451-6027 ext. 8-3299 or (317) 308-3299, or the U.S. EPA *Safe Drinking Water Hotline* at (800) 426-4791.

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

An NOI letter is a written notification indicating a facility's intention to comply with the terms of Rule 327 IAC 15-6 general storm water requirements in lieu of applying for an individual National Pollutant Discharge Elimination System (NPDES) permit. An NOI letter includes information required under 327 IAC 15-6-5.

The Rule 6 Industrial Storm Water Permit applies to businesses with specific standard industrial classification (SIC) codes. The SIC code is a four digit number used to identify the type of industrial activity at your business. Common SIC codes for auto salvage operations are:

- 5015: motor vehicle parts, used; and,
- 5093: scrap and waste materials.

If your SIC code is 5015 or 5093, and you have activities or materials exposed to rain and snow, you will need to submit a Rule 6 NOI letter for storm water run-off. If you have no materials (e.g., cars, parts, machinery) stored outside, and no activities (e.g., fluid removal, crushing, shredding, dismantling) conducted outside where they can potentially contaminate storm water, then you can file a U.S. EPA - *No Exposure Exclusion Form* # 3510-11 instead of an NOI.

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 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 further information about storm water, contact IDEM's *OWQ - Wetlands & Storm Water Section* at (800) 451-6027, or visit www.idem.IN.gov/4901.htm .

If you would like more information on Indiana's storm water regulations, you can find them on the IDEM Web site at www.idem.IN.gov/4901.htm .

The NOI and no exposure exclusion forms are in *Appendix: Water* of this guide. The NOI form can be obtained on the Indiana Commission on Public Records Web site at www.IN.gov/icpr/webfile/formsdiv/51286.pdf . The no exposure exclusion form is can be obtained on the U.S. EPA Web site at www.epa.gov/npdes/pubs/noexpoform_app4.pdf .

If you have not submitted your NOI letter or no exposure exclusion form, you will need to submit an RTC plan form that describes how you will address this deficiency. To be in compliance you will need to do one of the following items.

- If you have activities conducted outside or materials stored outside, you will need to contact IDEM's *Office of Water Quality-Wetlands & Storm Water Section* at (800) 451-6027 and submit a Rule 6 NOI form to IDEM. A $50 application fee and public notice in your local newspaper are required to be submitted with the NOI in order for it to be complete.

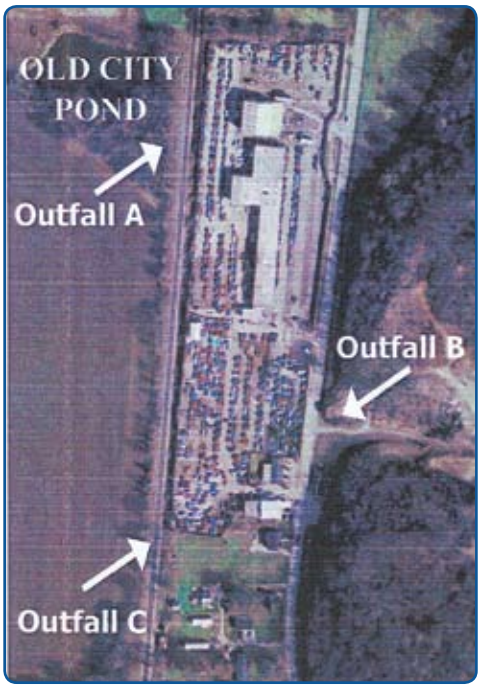
OR

- If you do not have any materials stored outside and do not conduct activities outside, you can contact IDEM's *Office of Water Quality-Wetlands & Storm Water Section* at (800) 451-6027 and submit a no exposure exclusion form to IDEM.

6a 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 submit a RTC plan form. The RTC plan form should indicate and document that you contacted IDEM's *OWQ - Wetlands & Storm Water Section* at (800) 451-6027 and submitted an amended NOI that reflects the outfalls and drainage areas on your property.



Aerial photo of auto recycler salvage yard with outfalls noted.

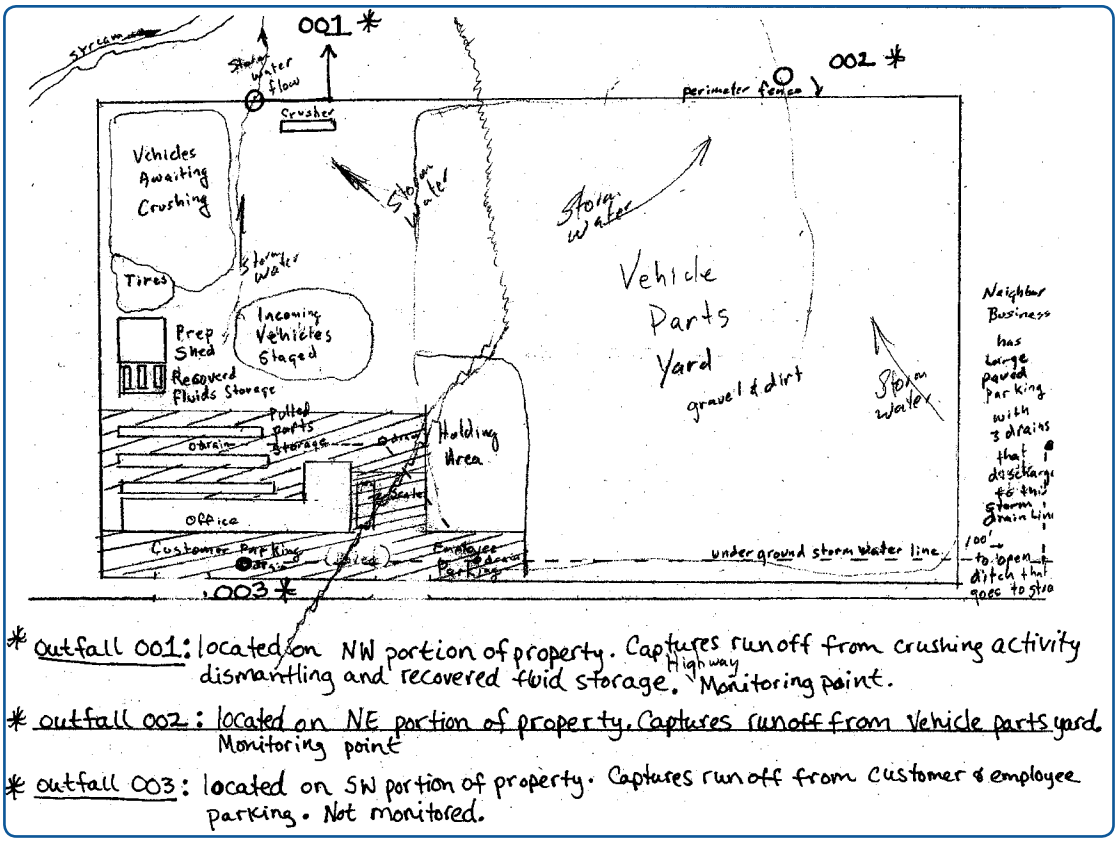


Diagram of auto salvage recycler yard with outfalls noted.

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.

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

After you submit an Notice of Intent (NOI), you have 365 days to develop and implement a SWP3. The SWP3 is a written document that prevents pollutant sources from entry into storm water run-off by developing and implementing best management practices and controls at your facility.

The plan 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.

You should answer "NO" to this question if you have never developed and implemented a SWP3 at your facility, even if you are still within the initial 365 day window. If you have not developed and implemented a SWP3 at your facility, you will need to submit an RTC plan form that documents how you will address this issue. You must provide a timeline to IDEM indicating your schedule for developing and implementing your SWP3.

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

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.

If you have not submitted your SWP3 certification checklist, then you will need to submit an RTC plan form. To be in compliance, you will need to submit your SWP3 certification checklist to IDEM or provide a timeline for completing and submitting the SWP3 certification checklist to IDEM.

View of auto recycler yard practicing good housekeeping.

9 Do you use good housekeeping measures to ensure that contaminants from auto salvage activities are not exposed to storm water?

For an example of a good housekeeping inspection program, see *Appendix:Water* of this guide. Good housekeeping is defined as maintaining a clean work environment to reduce or eliminate the potential mobilization of pollutants by storm water.

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 do not take measures to ensure that you maintain a clean work environment at your facility, answer "NO". If you answered "NO", you will need to submit an RTC plan form. To be in compliance, you will need to implement good housekeeping measures. Describe the housekeeping measures that are being implemented and submit the plan to IDEM.

For further information about storm water, contact IDEM's *OWQ - Wetlands & Storm Water Section* at (800) 451-6027, or visit www.idem.IN.gov/4901.htm .

Pooled storm water.

9a Has your facility developed best management practices (BMPs) to improve the quality of storm water run-off?

BMPs are any of the following measures to prevent or reduce the pollution of the Waters of the State. Schedules of activities, prohibitions of practice, treatment requirements, operation and maintenance procedures, use of containment facilities, and other management practices.

Have you developed and implemented BMPs at your facility? If you have not developed and implemented BMPs, answer "NO". If you answered "NO" to this question, then you will need to submit an RTC plan form. To be in compliance, you will need to develop BMPs and submit them to IDEM. In addition, you will need to submit a schedule for implementing the BMPs.

A list of possible BMPs for water is located in *Appendix: Water*.

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?			

Example of a quarterly storm water inspection form.

10 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 submit an RTC plan form. To be in compliance, you will need to conduct and document quarterly storm water inspections, and then address any problems noted during an inspection. To be in compliance, you will also need to submit to IDEM a copy of your first quarterly storm water inspection.

See *Appendix: Water* for an example of a quarterly stormwater visual monitoring form.

11 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 submit an RTC plan form. To be in compliance, you will need to provide and document annual training to all employees regarding the components and goals of the SWP3. Provide the training documentation for the current year to IDEM.

Information for annual employee SWP3 training is located in Appendix: Water.

Properly kept facility records.

12 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 (e.g., 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).

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.

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

Comments: _____

Instructor: _____ Date: _____

*Note: An inspector can be any person authorized by the facility owner who has an understanding of the

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

For more information on a qualifying rainfall event and how to sample, visit www.idem.IN.gov/4918.htm or www.ecy.wa.gov/pubs/0210071.pdf .

Water samples.

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, or see *Appendix: Water* of this guide 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, you will need to submit an RTC plan form. To be in compliance, you will need to sample all identified storm water run-off sources of the next measurable (one-tenth (1/10") of an inch) rainfall event and submit results as well as plans to ensure sampling takes place annually to IDEM.

Water sample testing.

12a Do your sample results indicate any contamination* by the twelve (12) parameters?

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 s.u. (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.

* 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.

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, did you identify the source(s) of the contaminants(s) and eliminate them? If the answer is "NO", then you will need to submit an RTC plan form. To be in compliance, you will need to:

1. identify the source of the contaminant(s);
2. develop and implement a plan to eliminate the contaminant(s); and,
3. submit the plan to IDEM.

Fluid release from salvage vehicle.

13 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.

IDEM facility inspection.

If you have not submitted your report, you will need to submit an RTC plan form. To be in compliance, you will need to answer the questions above and submit your report to IDEM.

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 or (317) 233-8488.

AGENCY TELEPHONE NUMBERS

Agency	Telephone number
IDEM	(800) 451-6027 or (317) 232-8603
IDEM-Emergency Response	(888) 233-7745 or (317) 234-4112
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-OPPTA	(800) 988-7901 or (317) 232-8172
IDEM-OWQ Drinking Water	(800) 451-6027 ext. 8-3299 or (317) 308-3299
IDEM-OWQ Wetlands & Storm Water	(800) 451-6027 ext. 3-8488 or (317) 233-8488
IDEM-Underground Storage Tanks	(800) 451-6027 ext. 4-4112 or (317) 234-4112
IDNR - Floodplain Management	(877) 928-3755 or (317) 232-4160
Indiana State Fire Marshal	(317) 233-5341 or (317) 234-2585
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) 886-7187
U.S. EPA Stratospheric Ozone Hotline	(800) 296-1996

WEB SITES IN THIS GUIDE

Description	Web site:
401 Water Quality Certification Program	www.idem.IN.gov/4385.htm
Air Compliance Assistance	www.idem.IN.gov/4981.htm
Air Permit Assistance	www.idem.IN.gov/4815.htm
Airbag Hazard (Sodium Azide)	www.bt.cdc.gov/agent/sodiumazide/basics/pdf/sodiumazide-facts.pdf
BMV Salvage License Form	www.IN.gov/icpr/webfile/formsdiv/40248.pdf
Construction Plan Development Assistance	www.idem.IN.gov/4899.htm
Construction/Land Disturbance Storm Water Permits	www.idem.IN.gov/4902.htm
Drinking Water	www.idem.IN.gov/5097.htm
ELVS Program	www.elvsolutions.org/
EPA Sweat Furnace Brochure	www.epa.gov/ttn/atw/alum2nd/secalum.pdf
Equipment Capable of Certification	www.epa.gov/ozone/title6/609/technicians/appequip.html
Floodplain Information	www.IN.gov/dnr/water/2459.htm
Mercury Bounty Claim Form	www.IN.gov/icpr/webfile/formsdiv/53238.pdf
Mercury Containing Vehicles	www.elvsolutions.org/attachment_a.htm
Mercury Spill Kit	https://decs.nhgl.med.navy.mil/DIS60/sec6b.htm
No Exposure Certification Form	www.epa.gov/npdes/pubs/noexpoform_app4.pdf
Notice of Intent Form	www.IN.gov/icpr/webfile/formsdiv/51286.pdf
Obtaining an ELVS Bucket	www.elvsolutions.org/contact.html
Oil Transporters	www.idem.IN.gov/files/hw_notifier_used_oil.pdf
Open Burning	www.idem.IN.gov/4980.htm
OPPTA CTAP	www.idem.IN.gov/4108.htm
Refrigerant Equipment Cert. Form	www.epa.gov/Ozone/title6/608/608fact.html#ownercert
Refrigerant Information	www.epa.gov/ozone/title6/609/
Registred Tire Transporters/Processors/ Storage Facilities	www.idem.IN.gov/files/wt_processors_and_storage.pdf www.idem.IN.gov/files/wt_transporters.pdf
Refrigerant Removal Training	www.epa.gov/ozone/title6/609/technicians/609certs.html
SIC Code	www.osha.gov/pls/imis/sicsearch.html
SPCC Plans	www.epa.gov/oem/content/spcc/index.htm www.epa.gov/region5oil/plan/spcc.html
Storm Water Pollution Prevention Plan	www.idem.IN.gov/4896.htm
Storm Water Rules	www.idem.IN.gov/4901.htm
Storm Water Sampling Information	www.idem.IN.gov/4918.htm
Storm Water Sampling Information	www.ecy.wa.gov/pubs/0210071.pdf
UST Registration Application	www.IN.gov/icpr/webfile/formsdiv/45223.doc
Waste Determinations	www.idem.IN.gov/catalog/guidance/la-062-gg.pdf
Waste Determinations	www.idem.IN.gov/5043.htm
Wetlands	www.idem.IN.gov/files/howdoiknowwetland.ppt
Wetlands	www.idem.IN.gov/4401.htm

APPENDIX: AUTO SALVAGE RECYCLER CERTIFICATION FORMS

Documents:

- Certification statement
- Facility non-applicability statement
- Return-to-compliance (RTC) plan forms
- Environmental self-audit checklist

APPENDIX: AUTO SALVAGE LICENSE

Documents:

- Application for *Indiana Salvage Motor Vehicle Business License*

APPENDIX: UNDERGROUND STORAGE TANK

Documents:

- Notification for underground storage tanks (USTs) form

APPENDIX: MERCURY SWITCHES

Documents:

- Payment for mercury switches from end-of-life vehicles (ELVs) claim form
- Annual mercury safety training form

APPENDIX: AIR

Documents:

- New regulation controlling emissions from secondary aluminum production (Sweat Furnace Operations) sheet
- Refrigerant removal records form
- Vehicles obtained without refrigerants form

APPENDIX: WATER

Documents:

- Notice of intent (NOI) letter
- No exposure certification for exclusion from NPDES storm water permitting
- Rule 6 storm water pollution prevention plan (SWP3) certification checklist
- Good housekeeping inspection checklist
- Best management practices (BMPs) for water checklist
- Quarterly storm water visual monitoring log
- Listing of analytical testing labs and environmental consulting firms
- Annual SWP3 training log

Auto Salvage Recyclers Certification Program Certification Statement

State Form 53766 (10-08)

Indiana Department of Environmental Management
Office of Land Quality/ Industrial Waste Compliance
Auto Salvage Recyclers Certification Program
100 North Senate Avenue
MC 66-20-2 Shadeland Office
Indianapolis IN 46204-2251

INSTRUCTIONS: ***1.*** *Complete ALL required Return-to-Compliance (RTC) plans (State Form 53767) before signing this statement.*

2. Sign and mail statement along with Self-Audit Checklist (State Form 53765) to the address at the upper right.

AUTHORITIVE STATEMENT

1. I _____, hereby certify to the following:

I) That I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certification statement.

II) That, based on my inquiry of those individuals responsible for obtaining the information, the information contained in this submittal is, to the best of my knowledge, true, accurate and complete.

III) That systems to maintain compliance are in place.

IV) That I am fully authorized to make this attestation on behalf of this facility.

I certify that the information I have provided in this form is true, accurate and complete, to the best of my knowledge.

Signature:	Date (*month, day, year*):
Printed Name:	Title:

2. Source of Signatory Authority:

If a Corporation: ☐ **President** ☐ **Secretary** ☐ **Treasurer**
☐ **Vice President** (*If authorized by corporate vote.*)
☐ **Representative of the above** (*If authorized by corporate vote and if responsible for overall operation of the facility.*)

If a Partnership: ☐ **General Partner**

If a Sole Proprietorship: ☐ **Owner / Proprietor**

INDIANA CLEAN YARD PARTICIPATION

3. If you are interested in becoming a certified “Indiana Clean Yard” please check the box below.
To determine “Indiana Clean Yard” criteria, see the Auto Salvage Recyclers workbook section - “Introduction: Clean Yard Levels of Recognition”.

☐ I am interested in becoming an “Indiana Clean Yard”.

Auto Salvage Recyclers Certification Program
Facility Non-Applicability Statement

State Form 53768 (10-08)

INSTRUCTIONS: *1. Read statement below and submit information.*
2. Sign and mail statement to the address in the box to the right.

Indiana Department of Environmental Management
Office of Land Quality/ Industrial Waste Compliance
Auto Salvage Recyclers Certification Program
100 North Senate Avenue
MC 66-20-2 Shadeland Office
Indianapolis IN 46204-2251

All facilities that have a Salvage Motor Vehicle Business License from the Indiana Bureau of Motor Vehicles are eligible to participate in the self-certification program. If your facility does not meet the description of an auto salvage facility actively operated by you, or if this package has been sent to you in error, please complete, sign and return this statement of non-applicability to the Indiana Department of Environmental Management. If you have any questions regarding the status of your facility, please call (317) 308-3103.

FACILITY INFORMATION

1. Facility Name:

Facility Street Address:

City/Town: State: ZIP:

Telephone Number: ( ) FAX Number: ( )

2. Contact Person: Telephone Number: ( )

3. Owner/Corporation:

4. This facility is not participating in the Indiana Auto Salvage Recyclers Certification Program for the following reason(s):

- ☐ No actively operated auto salvage yard operations occur at this address.
- ☐ The facility/property has been sold.

Returning this statement does not relieve you of your responsibility to comply with environmental requirements. Any complaints regarding your facility may still warrant an inspection from the Indiana Department of Environmental Management.

Signature: _____ **Date (*month, day, year*):** _____

Auto Salvage Recyclers Certification Program
Return-to-Compliance Plan

State Form 53767 (10-08)

Indiana Department of Environmental Management
Office of Land Quality/ Industrial Waste Compliance
Auto Salvage Recyclers Certification Program
100 North Senate Avenue
MC 66-20-2 Shadeland Office
Indianapolis IN 46204-2251

INSTRUCTIONS:
1. *BEFORE COMPLETING FORM, make as many copies as needed.*
2. *Complete a separate Return-to-Compliance form for EACH compliance question that requires one.*
3. *Attach to the Certification Self-Audit Checklist (State Form 53765) and return entire package to the address in the upper right corner.*

Only submit a Return-to-Compliance Plan for violations that you were unable to correct before certifying.

Completing this form does not relieve the facility of its affirmative responsibility to operate in compliance with applicable regulations. Failure to operate in full compliance with the applicable regulations may result in enforcement actions which may include fines or penalties.

FACILITY INFORMATION

Facility Name:

1. Please specify the section and question number from The Indiana Department of Environmental Management's publication "Auto Salvage Recyclers Environmental Self Audit Checklist and Workbook" for which you are reporting non-compliance:

Section: Question: Page Number:

Describe how you are out of compliance with the requirement referred to above:

2. Give a brief description of requirement:

3. What corrective action will you take to return to compliance?

4. Date facility is expected to be in compliance with this requirement (*month, day, year*):

Auto Salvage Recyclers Certification Program
Environmental Self-Audit Checklist

State Form 53765 (10-08)

Indiana Department of Environmental Management
Office of Land Quality/ Industrial Waste Compliance
Auto Salvage Recyclers Certification Program
100 North Senate Avenue
MC 66-20-2 Shadeland Office
Indianapolis IN 46204-2251

INSTRUCTIONS:
1. *Complete the information below and sections A through J.*
2. *See the Indiana Auto Salvage Recycler workbook for detailed information about each question and for instructions on how to complete this check-list and any Return-to-Compliance (RTC) plans.*
3. *Submit this form along with all Return-to-Compliance (RTC) forms (State Form 53767) to the address in the upper right corner.*

CONTACT INFORMATION

1. Facility Name:

Street Address:

City/Town: State: ZIP:

County:

Mailing Address (*if different*):

2. Bureau of Motor Vehicles Salvage Motor Vehicles Business License number:

3. Contact Person:

4. Owner Name:

Telephone number: ( ) FAX number: ( )

E-mail address:

5. Total site acreage (*in acres*):

Total size of vehicle storage area (*in acres*):

6. Approximate total number of vehicles currently stored on-site:

Approximate total number of vehicles received per year:

Approximate total number of vehicles removed per year:

7. Total number of employees:

8. Total years in operation (*former and current owners*):

FACILITY INFORMATION

Which of the following describes your facility operations? (*Check all that apply*)

- ☐ Dismantler/Recycler
- ☐ Towing Yard
- ☐ Auto Dealer
- ☐ Auto Repair/Service
- ☐ Auto Body or Rebuilder
- ☐ Shredder/Processor
- ☐ Other (*please specify*): _____

Which of the following describes vehicle crushing at your facility? (*Check all that apply*)

- ☐ Vehicles are taken to another site to be crushed.
- ☐ Vehicles are crushed at this facility by a contractor.
- ☐ Vehicles are crushed on-site using our own dedicated crusher.

Other than motor vehicles, does your facility receive any other type of solid waste, such as appliances, other scrap metal, or demolition debris?

- ☐ No
- ☐ Yes (*please specify type(s)*) _____
  _____
  _____
  _____

Which of the following parts/components are removed from vehicles and separately managed? (*Check all that apply*)

- ☐ Air bag Cartridges
- ☐ Asbestos Parts
- ☐ Antifreeze
- ☐ Batteries
- ☐ Brake Fluid
- ☐ Catalytic Converters
- ☐ CFC's (Chlorofluorocarbons)/Freon
- ☐ Drive Train / Engine
- ☐ Fuel Tanks
- ☐ Lead Parts
- ☐ Mercury Switches
- ☐ Oil Filters
- ☐ Tires
- ☐ Windshield Washer Fluid
- ☐ Used Oil (*Check all that apply*)
  - ☐ Transmission Fluid
  - ☐ Motor Oil
  - ☐ Crankcase Oil
  - ☐ Power Steering Fluid
- ☐ Other (*please specify*):_____
  _____

SECTION A AUTO SALVAGE LICENSE

1. Do you have a valid salvage motor vehicle business license?
   NOTE: A license is required for disposal facilities, used parts dealers, or automotive salvage builders that do 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 or dismantle vehicle.
   - Possess more than two (2) inoperable vehicles subject to registration for more than thirty (30) days.
   - Engage in the business of storing, disposing, salvaging, or recycling of vehicles, vehicle hulks, or the parts of vehicles.

☐ YES ☐ NO - *SUBMIT RTC PLAN*

SECTION B - FLUIDS MANAGEMENT

1. Do you have spills or releases of fluids at your facility?
   NOTE: Fluids include gasoline, motor oil, antifreeze, transmission fluid, brake fluid, battery acid, power steering fluid, crank case oil, solvents, paints, etc.

☐ YES - *SUBMIT RTC PLAN* ☐ NO

1a. If you answered YES to the question above, did you report the spills and releases to IDEM upon discovery?

☐ YES ☐ NO - *SUBMIT RTC PLAN*

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

☐ YES ☐ NO

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

☐ YES ☐ NO

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

☐ YES ☐ NO

5. Do you crush vehicles on site?
   NOTE: This applies to a crusher that is owned or contracted by the facility to do work on-site.
   If NO, skip question 5a.

☐ YES ☐ NO

5a. If you answered YES to the question above, do you locate the crusher in an impervious secondary containment unit or inside a building with concrete floors?

☐ YES ☐ NO

6. Do you remove and recycle windshield wiper fluid?

☐ YES ☐ NO

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

☐ YES ☐ NO

8. Do all of your fluid containers have secure (tightly sealed) lids?

☐ YES ☐ NO

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

☐ YES ☐ NO

10. 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?

☐ YES ☐ NO

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

☐ YES ☐ NO

12. 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?

☐ YES ☐ NO

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

☐ YES ☐ NO

SECTION C - OIL

1. Are your containers and/or tanks in good condition?
NOTE: Good condition is free from rust, dents, holes, bulges, and leaks.

☐ YES ☐ NO - *SUBMIT RTC PLAN*

2. Do you label used oil containers and/or tanks with the words “Used Oil”?

☐ YES ☐ NO - *SUBMIT RTC PLAN*

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

☐ YES ☐ NO

3a. Do you burn used oil generated only by your facility or by a household do-it-yourselfer?

☐ YES ☐ NO - *SUBMIT RTC PLAN*

4. Do you use a registered transporter for your shipments of used oil?
If YES, skip question 4a.

☐ YES ☐ NO - *SUBMIT RTC PLAN*

4a. 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,
- 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?

☐ YES ☐ NO - *SUBMIT RTC PLAN*

5. Do you have a total on-site oil storage capacity that exceeds one-thousand-three hundred-twenty (1320) gallons?
NOTE: Your storage capacity includes ONLY containers and/or tanks with a capacity of fifty-five (55) gallons or more and can include more than one storage location. In addition “oil” includes product oil as well as waste oil.
If NO, skip 5a.

☐ YES ☐ NO - *SUBMIT RTC PLAN*

5a. Does your facility have a Spill Prevention, Control, and Countermeasure Plan (SPCC Plan)?

☐ YES ☐ NO - *SUBMIT RTC PLAN*

SECTION D - UNDERGROUND STORAGE TANKS

1. Does your facility have any underground storage tanks (USTs)?
If NO, skip to next section E - Hazardous Waste.

☐ YES ☐ NO

1a. Do you have petroleum or hazardous substance containing UST(s) (110 gallons or more) that have not been registered with IDEM?
NOTE: Underground storage tanks storing fuel for heating are exempt.

☐ YES - *SUBMIT RTC PLAN* ☐ NO

SECTION E - HAZARDOUS WASTE

1. Does your facility have any unknown materials on-site?

☐ YES - *SUBMIT RTC PLAN* ☐ NO

2. Do you generate hazardous waste in quantities greater than or equal to two-hundred-twenty (220) lbs/month?

☐ YES - *SUBMIT RTC PLAN* ☐ NO

SECTION F - WASTE TIRE MANAGEMENT

1. Does your facility have over 1,000 waste tires stored outside or over 2,000 waste tires stored inside?
NOTE: A waste tire is a tire that is not suitable for the tire's original purpose. A tire with less than 2/32" 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 2/32" of tread depth remaining.
If NO, skip to question 2.

☐ YES ☐ NO

1a. Does your facility have a valid certificate of registration as a waste tire storage facility?

☐ YES ☐ NO - *SUBMIT RTC PLAN*

2. Do you open dump waste tires at your facility?
NOTE: Open dumping is the consolidation of solid waste from one (1) or more sources or the disposal of solid waste at a single disposal site that:
   a. does not fulfill the requirements of a sanitary landfill or other land disposal method as prescribed by law or regulations; and
   b. is established and maintained:
      1. without cover; and
      2. without regard to the possibilities of contamination of surface or subsurface water resources.

☐ YES - *SUBMIT RTC PLAN* ☐ NO

3. Do you store waste tires in a manner that poses a fire hazard?
NOTE: Some areas where tires should not be stored include near heat sources (e.g. activities like welding, or smoking) and under power lines.

☐ YES - *SUBMIT RTC PLAN* ☐ NO

4. Do you prevent water from accumulating in the waste tires?
NOTE: Water accumulation may be prevented by storing tires inside or under cover, by altering the tires so that they cannot accumulate water, or other methods.

☐ YES ☐ NO - *SUBMIT RTC PLAN*

5. Do your waste tires have the potential to harbor vectors that pose a threat to human health?
NOTE: A vector is a mosquito, rodent, flea, tick, or other animal that can carry disease to humans.

☐ YES - *SUBMIT RTC PLAN* ☐ NO

6. Do you ship whole waste tires off-site?
If NO, skip to next Section G - Mercury Switches.

☐ YES ☐ NO

7. Are your tires delivered to one or more of the following approved locations?
   - A wholesaler or agent of a wholesaler, OR
   - A facility that recycles or collects tires for delivery to a facility that recycles, OR
   - A permitted final disposal facility regulated under environmental management laws, OR
   - A permitted waste tire storage site, OR
   - A facility operated as a waste tire cutting facility under a permit issued by the commissioner, OR
   - A registered waste tire transporter or a person who operates a municipal waste collection and transportation vehicle licensed under IC 13-20-4.

☐ YES ☐ NO - *SUBMIT RTC PLAN*

SECTION G - MERCURY SWITCHES

1. Do you receive vehicles that contain mercury switches at your facility?
   NOTE: For a list of vehicles that contain mercury switches, see **http://www.elvsolutions.org/attachment_a.htm.**
   If NO, skip to next Section H - Solid Waste.

☐ YES ☐ NO

2. Do you remove mercury switches from vehicles at your facility?

☐ YES ☐ NO - *SUBMIT RTC PLAN*

3. Do you store mercury switches and/or ABS G-force sensors that contain mercury switches in an appropriate container?
   NOTE: An appropriate container is a container that meets the universal waste regulations for transportation (i.e., a bucket provided by End of Life Vehicle Solutions [ELVS]).

☐ YES ☐ NO - *SUBMIT RTC PLAN*

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

☐ YES ☐ NO - *SUBMIT RTC PLAN*

5. Do you mark the containers as Universal Waste?
   NOTE: An appropriate label for mercury switches will have the words Universal Waste and one of the following three (3) descriptions: “Mercury Containing Equipment”, “Waste Mercury-Containing Equipment”, or “Used Mercury-Containing Equipment”.

☐ YES ☐ NO - *SUBMIT RTC PLAN*

6. Have any containers of mercury switches been accumulating on-site for more than one (1) year?
   NOTE: Containers should be labeled with the accumulation start date.

☐ YES - *SUBMIT RTC PLAN* ☐ NO

7. Do you maintain records of mercury switch removals?
   NOTE: 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 of switches collected. You must keep those records for at least three (3) years.

☐ YES ☐ NO - *SUBMIT RTC PLAN*

8. Does your facility use appropriate safety procedures and have emergency equipment available in the areas where you handle mercury switches?
   NOTE: These procedures and equipment can include handling mercury in a well-ventilated area, using containment devices, and having a mercury spill kit.

☐ YES ☐ NO - *SUBMIT RTC PLAN*

9. Have you trained your employees on appropriate safety and emergency equipment procedures for removing and handling mercury switches?
   NOTE: These procedures can include removing switches over a containment device, having a mercury spill kit on hand, and removing switches in a well vented area.

☐ YES ☐ NO - *SUBMIT RTC PLAN*

SECTION H - SOLID WASTE

1. Do you open dump materials at your facility?
NOTE: Materials can be garbage, refuse, construction debris, commercial, industrial or household wastes, ash piles, contaminated soils, or similar items.

☐ YES - *SUBMIT RTC PLAN* ☐ NO

2. Do you remove brake or clutch pads from vehicles at your facility?
If NO, skip to question 3.

☐ YES ☐ NO

2a. Do you take measures to eliminate asbestos exposure?

☐ YES ☐ NO

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

☐ YES ☐ NO

3a. Do you take measures to safely remove non-deployed air bags?

☐ YES ☐ NO

SECTION I - AIR

1. Do you open burn any materials on your property?
NOTE: Open burn means the burning of any materials (i.e., any non-vegetative matter) without passing through a stack or chimney from an enclosed chamber.

☐ YES - *SUBMIT RTC PLAN* ☐ NO

2. Do you use solvents (cleaners/degreasers) at your facility?
If NO, skip to question 3.

☐ YES - *SUBMIT RTC PLAN* ☐ NO

2a. Do you store your solvent containers closed?
NOTE: A solvent container can be a parts washer (degreaser).

☐ YES ☐ NO - *SUBMIT RTC PLAN*

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

☐ YES - *SUBMIT RTC PLAN* ☐ NO

4. Do you use a sweat furnace at your facility?
NOTE: A sweat furnace is used to convert piles of mixed aluminum scrap into more uniform, saleable ingots or sows.

☐ YES - *SUBMIT RTC PLAN* ☐ NO

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

☐ YES ☐ NO - *SUBMIT RTC PLAN*

6. Do you collect refrigerants in EPA approved devices?

☐ YES ☐ NO - *SUBMIT RTC PLAN*

7. Do you release refrigerants into the atmosphere?

☐ YES - *SUBMIT RTC PLAN* ☐ NO

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

☐ YES ☐ NO

9. Are employees trained to remove and capture refrigerants?

☐ YES ☐ NO

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

☐ YES ☐ NO

11. Are all collection/storage devices inspected to ensure that they are not overfilled?

☐ YES ☐ NO

SECTION J - WATER

1. Are there any existing or planned land disturbing activities greater than one (1) acre at your facility?
NOTE: Land disturbing activities include any man-made change of the land surface, including purposefully removing vegetative cover, excavating, grading, filling, and construction.

☐ YES ☐ NO

1a. If you answered YES to the above question, does your facility have a permit for land disturbing activities as referenced under 327 IAC 15-5?

☐ YES ☐ NO - *SUBMIT RTC PLAN*

2. Is there extensive soil build-up on the roads around your facility?
NOTE: Extensive soil build-up can be defined as the amount of soil/dirt build-up that may be a potential vehicle contamination issue or driving obstruction/hazard.

☐ YES - *SUBMIT RTC PLAN* ☐ NO

3. Is your facility (or any part of it) located in a potential floodway?
NOTE: A floodway includes the channel of a stream and the parts of the floodplain that are reasonably required to carry flood water.

☐ YES ☐ NO

3a. If you answered YES to the above question, does your facility have any construction or filling activities in a potential floodway?

☐ YES - *SUBMIT RTC PLAN* ☐ NO

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

☐ YES - *SUBMIT RTC PLAN* ☐ NO

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

☐ YES ☐ NO

5a. If you answered NO to the above question, does your facility have a Private Water System ID number?
Note: If you have a private water system that serves 25 or more individuals daily for at least sixty (60) days a year, you need a Private Water System ID number.

☐ YES - ID #:_____ ☐ NO

6. Has your facility submitted a Rule 6 Notice of Intent (NOI) Letter, State Form 51286, for Storm Water Runoff Exposed to Industrial Activity?
NOTE: An NOI letter is a written notification indicating a facility's intention to comply with the terms of rule 327 IAC 15-6 in lieu of applying for an individual NPDES permit. An NOI letter includes information required under 327 IAC 15-6-5.

☐ YES - ID #:_____ ☐ NO - *SUBMIT RTC PLAN*

6a. Does your NOI include all the locations of outfalls and drainage areas (i.e., an area that discharges surface or surplus water) at your facility?

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

☐ YES ☐ NO - *SUBMIT RTC PLAN*

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

NOTE: You should answer NO to this question if you have never developed or implemented your SWP3 even if you are still within the initial 365 day window.

☐ YES ☐ NO - *SUBMIT RTC PLAN*

8. Has your facility submitted the Storm Water Pollution Prevention Plan (SWP3) Certification Checklist (State Form 51287) signed by a qualified professional to the Department?

NOTE: A qualified professional is someone who is trained and experienced in storm water treatment techniques. An example of this may be a consultant or engineer who does storm water work.

☐ YES ☐ NO - *SUBMIT RTC PLAN*

9. Do you use good housekeeping measures to ensure that contaminants from auto salvage activities are not exposed to storm water?

For an example of a good housekeeping inspection program, see Appendix: Water in the Auto Salvage Recyclers Workbook.

☐ YES ☐ NO - *SUBMIT RTC PLAN*

9a. Has your facility developed Best Management Practices (BMPs) to improve the quality of storm water run-off?

NOTE: BMPs are any of the following measures to prevent or reduce the pollution of waters of the state: schedules of activities, prohibitions of practice, treatment requirements, operation and maintenance procedures, use of containment facilities, other management practices.

☐ YES ☐ NO - *SUBMIT RTC PLAN*

10. Do you have records documenting your quarterly storm water run-off inspections?

For an example of a quarterly inspection form, see Appendix: Water in the Auto Salvage Recyclers Workbook.

☐ YES ☐ NO - *SUBMIT RTC PLAN*

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

For an example of a training log and what should be in the training, see Appendix: Water in the Auto Salvage Recyclers Workbook.

☐ YES ☐ NO - *SUBMIT RTC PLAN*

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

NOTE: 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.

☐ YES ☐ NO - *SUBMIT RTC PLAN*

12a. Do your sample results indicate any contamination of the twelve (12) parameters?

NOTE: Contamination means that the results exceed the benchmark level.

☐ YES - *SUBMIT RTC PLAN* ☐ NO

12b. Did your facility identify the source(s) of the contaminant(s) and eliminate them?

☐ YES ☐ NO - *SUBMIT RTC PLAN*

13. Has your facility submitted the Annual Report?

☐ YES ☐ NO - *SUBMIT RTC PLAN*

APPLICATION FOR SALVAGE MOTOR VEHICLE BUSINESS LICENSE

State Form 40248 (R6 / 5-08)

* This agency is requesting the disclosure of your Social Security Number in accordance with IC 4-1-8-1; disclosure is mandatory and this record cannot be processed without it.

INSTRUCTIONS: 1. *Complete application in full.*
2. *Do not send payment with application.*
3. *Mail to* ***Secretary of State, Dealer Division, 6400 East 30th Street, Indianapolis, Indiana 46219.***

Reset Form

1. Name of business			County code
Business address (*number and street, city, state, and ZIP code*)			
County	Telephone number ( )	2. Retail merchants certificate number	3. Federal ID number
If you have a rural location, please give directions to place of business			

4. Check the function(s) for which you wish to be licensed:

☐ Salvage recycler ☐ Salvage rebuilder ☐ Hulk crusher ☐ Used parts dealer

5. Check the activities to be conducted at this location:

☐ 1. Selling used major component parts of vehicles;
☐ 2. Wrecking or dismantling vehicles for resale of their major component parts;
☐ 3. Rebuilding wrecked or dismantled vehicles;
☐ 4. Possessing two (2) or more inoperable vehicles subject to registration for more than thirty (30) days;
☐ 5. Engaging in the business of storing, disposing, salvaging, or recycling of vehicles, vehicle hulks, or the parts of vehicles.

6. List any branch or supplemental locations required to be licensed to perform any of the above activities:

NAME	ADDRESS (*number & street, city, state, & ZIP code*)	TELEPHONE NUMBER	COUNTY
		( )	
		( )	
		( )	
		( )	

7. Has any owner, partner, officer, director, or agent of applicant had a civil judgment or criminal conviction against them for any violation of any State or Federal laws concerning the sale, distribution, financing, or insuring of motor vehicles or parts within the last three years? ☐ Yes ☐ No If Yes, please give details:

8. Has any owner, partner, officer, director or agent of applicant had a Salvage Operator license suspended or revoked or had an application for a Salvage Operator license rejected in this or any other state within the last three years? ☐ Yes ☐ No If Yes, explain:

TO BE COMPLETED BY LOCAL ZONING BOARD

I, the undersigned, verify compliance with local zoning ordinances or other local ordinances for conducting Salvage Operator business at the address cited above.

Signature	Authorized agency	Date (*month, day, year*)
Printed or typed name	Title	

(*Continued on the reverse side*)

9. Check type of business organization:

☐ Sole Proprietorship ☐ Partnership ☐ Corporation ☐ Unincorporated association

10. If Sole Proprietorship, list information for owner. If Partnership, list information for all partners. If Corporation, list information for all officers. If Unincorporated Association, list information for all managers or chief administrative officials.

NAME	SOCIAL SECURITY NUMBER *	TITLE	ADDRESS (*number & street, city, state, & ZIP code*)	TELEPHONE NUMBER
				( )
				( )
				( )
				( )
				( )

11. State the name and address of the person upon whom legal service of process may be made:

Name	Address (*number and street, city, state, and ZIP code*)

12. If corporation, give the date and state of incorporation.	13. If foreign corporation, state the date of admission to do business in Indiana.

14. Has any owner, partner, officer, or director of applicant owned or worked for another salvage operator in this or any other state within the last three (3) years? ☐ Yes ☐ No If Yes, give name of individual and name and address of business.

Name of individual	Name of business

Address of business (*number and street, city, state, and ZIP code*)

Name of individual	Name of business

Address of business (*number and street, city, state, and ZIP code*)

15. Indicate whether your establishment is owned or leased.

14. Is this location devoted solely to the business of recycling, rebuilding, dismantling, crushing and/or exchanging used motor vehicle parts / vehicles?

☐ Yes ☐ No

If no, explain:

PLEASE NOTE: Every disposal facility or automotive salvage rebuilder shall keep and maintain records on the current model year and immediate four (4) preceding model years for all salvage motor vehicles as indicated in 140 IAC 3-3-8 (Vehicle Register and Major Component Parts Register) and required by IC 9-22-3-20.

Any salvage motor vehicle or major component part which is subject to recordkeeping procedures by law and per regulation which has been acquired and entered into the vehicle register or major component parts register shall be subject to recordkeeping for disposal purposes even though the sale of such vehicle or part is beyond the five (5) year provisions of 140 IAC 3-3-8.

All records required to be maintained under IC 9-22-3-21 and inventory are subject to inspection by a police officer or bureau representative during normal business hours.

I hereby certify, under the penalty of perjury, that I am authorized to make this application and that the answers and information contained in this application are true and correct.

Signature of applicant	Date (*month, day, year*)

Printed or typed name	Title

STATE FORM45223 (R3/11-08)

INSTRUCTIONS
FOR THE
NOTIFICATION FOR UNDERGROUND STORAGE TANKS

This instruction page will provide you with general information on how to complete the Notification for Underground Storage Tanks form. Each section is referenced with a letter corresponding to the letter of the instructions in the left column of this page.

Headers

If you know the Facility, Owner, Federal or EPA Identification numbers, please write these in the spaces provided in the header of the first page. At the top of each following page, indicate the Facility Name and Facility Identification number to ensure that separated pages will be properly filed with their respective facility.

A. General Information

Type of Notification - Indicate the purpose of this notification by filling in the circle next to the desired type.

B. Ownership of Tanks

Owner of Tanks - All Notifications must contain ownership information. Indicate the name, mailing address, city, state, zip code, and telephone number of the owner of the tanks at the facility.

C. Location of Tanks

Tank/Facility Location - Must contain a facility name. If the facility location is different than the mailing address, indicate this location in the space provided.
Type of Owner - Check the type of owner that applies to the facility and give the effective date of ownership.
Type of Operation - Check the type of operation that applies to the facility and give the GIS coordinates of the facility. The GIS coordinates may be obtained from the Indiana DNR, your county surveyor's office or the U.S. Geological Survey. These data are optional.

D. Certification and Contacts (All signatures must be in ink)

Consultant/Contractor compliance certification - to be completed by the consultant/contractor who performed the installation/closure or upgrade being reported on this notification. This section DOES NOT need to be completed for a request for closure or change of ownership notification.
Contact at Tank Location - A contact's name, title, and telephone number at the tank location is indicated here.
Owner Certification - MUST be completed by the owner or authorized representative (letter signed by owner authorizing signatory authority must accompany each notification signed by the authorized representative).
Number of Tanks at this Location - Total number of tanks currently in use or temporarily out of use (or have undergone a change-in-service). Do not list those tanks that are permanently out of use.
Number of pages attached to this notification - total number of pages attached (i.e.. pages 2 & 3 may need to be copied when there are more than six tanks for which there is information provided in this notification).

E. General

Each column of the Tank Information pages is dedicated to ONE TANK ONLY. Assign a number to each tank by using the appropriate column, beginning with one (1) and proceeding as needed for the number of tanks at the facility. Attach additional sheets as needed. Owner-specified Tank Number blanks are provided to aid you in coordinating this Notification with your own tank numbering system. Indicate the tank installation dates and capacities in the provided spaces.

F. Tank Status

Select ONLY ONE of the three boxes (1,2 or 3) in this section for each tank. Indicate the appropriate date for the indicated tank status. If requesting closure, indicate the type of closure being requested in box (4) (removal, in-place, or change-in-service). If requesting Change-in-Service, mark the type of change in box (5).

G. Contents

Select ONLY ONE of the three boxes (1, 2, or 3) in this section. If the tank is currently empty, indicate the last substance to be stored in that tank. For a tank containing Hazardous Substances, indicate the common name of the substance and the correct identification number as appropriate. If a tank contains a petroleum and a hazardous substance, indicate both substances separately. If a tank contains a mixture of hazardous substances fill in the circle.

H. & I. Construction/protection and Piping

For all tank systems, fill in all circles that apply to that tank system.

J.K.&L Release Detection, Cathodic Protection and spill/Overflow Control

Fill in all circles that apply in each of these sections for each tank. If a tank or tanks have specific leak detection/ protection information that is not contained on this form, indicate the tank number(s) and the method(s) in the 'Another Method" sections.

(CONTINUED ON REVERSE)

INSTRUCTIONS
FOR THE
NOTIFICATION FOR UNDERGROUND STORAGE TANKS

M. Contractor Information

Fill in all circles that apply to the contractor who has done the current tank work for which the notification form is being submitted (installation, closure, or upgrade). If the form is being submitted for a reason other than these tank activities, tank contractor compliance information does not have to be provided and this part of this section may be left uncompleted.

N. Certification of Financial Responsibility

Indicate the method of Financial Responsibility that is used to meet the deductible requirement for Excess Liability Fund eligibility. Fill in the circle(s) that apply for each method(s) being used to provide this coverage.

O. Closure Request

Proposed Contractor - Submit the tank contractor information in the spaces provided. The contractor certification number must be provided to insure that the closure will be performed by a tank contractor certified by the Office of the State Fire Marshal.

LUST Incident Information - If the tank(s) to be permanently closed are the source of a release or contamination, a Leaking Underground Storage Tank incident number must be obtained (call the IDEM LUST Section @ (317) 232-8900) and submitted in the space provided.

UST System Closure Report

Within 30 days of the closure of any UST System, the owner is required to submit an UST System Closure Report to the UST Section of the Indiana Department of Environmental Management. This UST System Closure Report must conform to UST May 2002 Section Closure Requirements.

Closure reports are also required for the closure of any piping related to an UST System. By definition, piping is part of an UST System and an assessment of native soils under the piping must be made when it is removed, replaced, or closed in place. While this office does require prior approval when replacing piping, an assessment is still required. An item by item description of information required for closure reports can be found in the May 2002 Closure Requirements.

Once the UST System Closure Report is received by the UST Section of the Indiana Department of Environmental Management, it is to be reviewed within 6 months. Once the report is reviewed, a checklist will be generated and sent to the owner of the closed UST(s). If none of the boxes on the checklist are marked 'INADEQUATE', the UST closure is completed and no further work is required.

COMPLETION OF UST CLOSURE REQUIREMENTS DOES NOT INCLUDE ANY POSSIBLE WORK REQUIRED FOR THE CLEAN UP OF CONTAMINATION RELATED TO THIS CLOSURE.

STATE FORM 45223(R3/11-08)

NOTIFICATION FOR UNDERGROUND STORAGE TANKS

RETURN COMPLETED FORMS TO :

Indiana Department of Environmental Management
Office of Land Quality, UST Section
100 N. Senate Ave.
Indianapolis, IN 46204-2251
UST: (317) 308-3024 LUST: (317) 232-8900

Facility ID Number	
Federal ID Number	
Owner ID Number	

A GENERAL INFO

Notification is required by Federal and State laws for all storage tanks that are operational or have been used to store regulated substances since January 1, 1974. The information requested is required by Indiana Code 329 IAC 9, as amended. Specific detailed instructions for the completion of this form may be obtained by contacting the UST Section at the above address.

TYPE OF NOTIFICATION

THIS NOTIFICATION FORM PROVIDES INFORMATION FOR (CHECK ALL THAT APPLY):

☐	A NEW FACILITY	☐	AN ADDRESS CHANGE	☐	A TEMPORARY CLOSURE
☐	A NEW OWNER	☐	A CHANGE OF OWNERSHIP	☐	A REQUEST FOR CLOSURE
☐	A NEW TANK	☐	OTHER	☐	A PERMANENT CLOSURE
☐	A SYSTEM UPGRADE				WITH CLOSURE REPORT

B OWNER OF TANKS

OWNER OF TANKS

OWNER NAME

MAILING ADDRESS

CITY
STATE

ZIP CODE | | | | - | | | |

TELEPHONE ( ) -

OPERATOR OF FACILITY

OPERATOR NAME (IF SAME AS OWNER, MARK BOX HERE [ ])

MAILING ADDRESS

CITY STATE

ZIP CODE | | | | - | | | |

TELEPHONE ( ) -

C TANK/FACILITY LOCATION

FACILITY NAME (IF SAME AS OWNER, MARK BOX HERE [ ])

MAILING ADDRESS (IF SAME AS OWNER, MARK BOX HERE [ ])

LOCATION OF TANKS

CITY

ZIP CODE | | | | - | | | |

COUNTY

TYPE OF FACILITY/OWNER

TYPE OF OWNER
TYPE OF OPERATION

☐	PRIVATE/BUSINESS	☐	MOTOR VEHICLE FUEL
☐	STATE GOVERNMENT		DISPENSING STATION
☐	LOCAL GOVERNMENT	☐	COMMERCIAL
☐	FEDERAL GOVERNMENT	☐	RESIDENTIAL
	GSA FACILITY (ID# _____)	☐	INDUSTRIAL
☐	OTHER	☐	AGRICULTURE
	EFFECTIVE DATE OF OWNERSHIP / /	☐	OTHER
			UTM COORDINATES

D CONSULTANT/CONTRACTOR COMPLIANCE CERTIFICATION

CERTIFICATION

OATH: I certify that the information concerning installation, upgrade, or closure provided in this notification is true and correct to the best of my knowledge.

NAME OF CONTRACTOR/CONSULTANT

NAME OF COMPANY

SIGNATURE OF CONTRACTOR (IN INK - NO PHOTOCOPIES WILL BE ACCEPTED)

CERTIFICATION NUMBER —

DATE / /

CONTACT AT TANK LOCATION

NAME OF CONTACT PERSON AT TANK LOCATION

NUMBER OF TANKS AT THIS LOCATION ____

JOB TITLE

TELEPHONE NUMBER ( ) --

NUMBER OF PAGES ATTACHED TO THIS NOTIFICATION ____

OWNER CERTIFICATION

OATH: I certify that under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

NAME AND TITLE OF OWNER OR AUTHORIZED REPRESENTATIVE

SIGNATURE OF OWNER (IN INK - NO PHOTOCOPIES WILL BE ACCEPTED)

DATE / /

STATE USE ONLY

STATE FORM 45223(R3/3-05)

DESCRIPTION OF UNDERGROUND STORAGE TANK SYSTEM

E COMPLETE A COLUMN FOR EACH TANK. ATTACH ADDITIONAL SHEETS WHEN NUMBER OF TANKS EXCEEDS SIX.

GENERAL	**SEQUENTIAL TANK NUMBER**						
	OWNER-SPECIFIED TANK NUMBER						
	DATE INSTALLED	/ /	/ /	/ /	/ /	/ /	/ /
	CAPACITY (GALLONS)						
F **TANK STATUS**	COMPLETE ONLY ONE OF 1, 2 OR 3. **1. CURRENTLY IN USE** DATE BROUGHT INTO USE	☐ / /	☐ / /	☐ / /	☐ / /	☐ / /	☐ / /
	2. TEMPORARILY OUT OF USE DATE LAST USED	☐ / /	☐ / /	☐ / /	☐ / /	☐ / /	☐ / /
	3. PERMANENTLY OUT OF USE DATE REMOVED FROM GROUND	/ /	/ /	/ /	/ /	/ /	/ /
	DATE FILLED IN-PLACE	/ /	/ /	/ /	/ /	/ /	/ /
	1, 2 OR 3 MUST BE COMPLETED IF SECTIONS 4 OR 5 ARE SELECTED. SECTION 4 B REQUIRES PRE-NOTIFICATION **4. REQUESTING CLOSURE**	☐	☐	☐	☐	☐	☐
	A. TO BE REMOVED	☐	☐	☐	☐	☐	☐
	B. TO BE FILLED IN PLACE	☐	☐	☐	☐	☐	☐
	5. CHANGE-IN-SERVICE REGULATED TO UNREGULATED	☐	☐	☐	☐	☐	☐
	UNREGULATED TO REGULATED	☐	☐	☐	☐	☐	☐
G **CONTENTS**	**SUBSTANCE CURRENTLY OR LAST STORED** (COMPLETE ONLY ONE OF 1, 2 OR 3) **1. PETROLEUM** DIESEL	☐	☐	☐	☐	☐	☐
	KEROSENE	☐	☐	☐	☐	☐	☐
	GASOLINE	☐	☐	☐	☐	☐	☐
	USED OIL	☐	☐	☐	☐	☐	☐
	OTHER (specify)						
	2. HAZARDOUS SUBSTANCE	☐	☐	☐	☐	☐	☐
	CERCLA SUBSTANCE or						
	Chemical Abstract Service Number						
	MIXTURE OF SUBSTANCES	☐	☐	☐	☐	☐	☐
	3. UNKNOWN	☐	☐	☐	☐	☐	☐
H **CONSTRUCTION/PROTECTION**	**TANK CONSTRUCTION** STEEL	☐	☐	☐	☐	☐	☐
	CLAD (ACT 100	☐	☐	☐	☐	☐	☐
	FIBERGLASS/PLASTIC	☐	☐	☐	☐	☐	☐
	INTERSTITIAL-DOUBLE WALLED	☐	☐	☐	☐	☐	☐
	OTHER (specify)						
	TANK CORROSION PROTECTION INTERIOR LINING	☐	☐	☐	☐	☐	☐
	DATE	___/___/___	___/___/___	___/___/___	___/___/___	___/___/___	___/___/___
	FIBERGLASS/PLASTIC	☐	☐	☐	☐	☐	☐
	IMPRESSED CURRENT (RECTIFIERS)	☐	☐	☐	☐	☐	☐
	LAST ANODE TEST	___/___/___	___/___/___	___/___/___	___/___/___	___/___/___	___/___/___
	SACRIFICIAL ANODES ON TANK (GALVANIC)	☐	☐	☐	☐	☐	☐
	LAST ANODE TEST	___/___/___	___/___/___	___/___/___	___/___/___	___/___/___	___/___/___
	OTHER (specify)						
I **PIPING**	**PIPING CORROSION PROTECTION** FIBERGLASS REINFORCED PLASTIC	☐	☐	☐	☐	☐	☐
	IMPRESSED CURRENT (RECTIFIER)	☐	☐	☐	☐	☐	☐
	LAST ANODE TEST	___/___/___	___/___/___	___/___/___	___/___/___	___/___/___	___/___/___
	SACRIFICIAL ANODES (GALVANIC)	☐	☐	☐	☐	☐	☐
	LAST ANODE TEST	___/___/___	___/___/___	___/___/___	___/___/___	___/___/___	___/___/___
	OTHER (specify)						

STATE FORM 45223 (R3/11-08)

FACILITY NAME _____ **FACILITY ID.** _____ **PAGE** ___ **OF** _____

DESCRIPTION OF UNDERGROUND STORAGE TANK SYSTEMS (CONTINUED)

COMPLETE A COLUMN FOR EACH TANK — ATTACH ADDITIONAL SHEETS WHEN THE NUMBER OF TANKS EXCEEDS SIX.

		Sequential Tank Number					
J RELEASE DETECION	**Tank** (Only for use with tanks 2000 gallons or smaller) Manual Tank Gauging	□	□	□	□	□	□
	(Can only be used for 10 yrs) Tank Tightness Testing With Daily Inventory Controls	□	□	□	□	□	□
	(ATG must perform monthly leak test) Automatic Tank Gauging	□	□	□	□	□	□
	(Site Assessment required for use) Vapor Monitoring	□	□	□	□	□	□
	(Site Assessment required for use) Ground Water Monitoring	□	□	□	□	□	□
	Interstitial Monitoring Within a Secondary Barrier	□	□	□	□	□	□
	Interstitial Monitoring Within Secondary Containment	□	□	□	□	□	□
	Statistical Inventory Reconciliation (SIR)	□	□	□	□	□	□
	Another Method (Please specify below)	□	□	□	□	□	□
K	**PIPING** Suction (Check valve at pump) EUROPEAN SUCTION	□	□	□	□	□	□
	(Check valve at tank) AMERICAN SUCTION	□	□	□	□	□	□
	Pressurized (Required for pressurized piping only) Automatic Line Leak Detectors	□	□	□	□	□	□
	MUST CHECK ONE — **Flow Restrictor**	□	□	□	□	□	□
	Flow Shut Off	□	□	□	□	□	□
	Alarm	□	□	□	□	□	□
	MUST CHECK ONE — **SIR**	□	□	□	□	□	□
	ATG	□	□	□	□	□	□
	Interstitial - Double Walled	□	□	□	□	□	□
	(Required if tank leak detection does not cover piping) Line Tightness Testing	□	□	□	□	□	□
L SPILL	(Required for most tanks) Catchment Basins	□	□	□	□	□	□
	(Valve attached to fill pipe) Automatic Shutoff Devices	□	□	□	□	□	□
	(MUST be audible to fuel delivery personnel) Overfill Alarms	□	□	□	□	□	□
	(Not recommended for use with suction piping) Ball Float Valves	□	□	□	□	□	□
	Another Method (Please specify below)	□	□	□	□	□	□
M CONTRACTOR	**Indicate compliance specific to this installation upgrade, or closure** — Installer is certified by the tank and piping manufacturer.	□	□	□	□	□	□
	Contractor is certified by the Office of the State Fire Marshal.	□	□	□	□	□	□
	Work inspected/certified by a registered professional engineer.	□	□	□	□	□	□
	Work inspected by the Office of the State Fire Marshal.	□	□	□	□	□	□
	All work has been completed.	□	□	□	□	□	□
	Another method of compliance was used (specify below).	□	□	□	□	□	□

CERTIFICATION OF FINANCIAL RESPONSIBILITY

N FINANCCIAL

I have financial responsibility in accordance with Subtitle I Subpart H (Specify below).

- □ Self-Insurance
- □ Trust Agreement
- □ Guarantee
- □ Surety Bond
- □ Letter of Credit
- □ Local Government - Bond Rating Test
- □ Local Government - Financial Test
- □ Local Government - Guarantee
- □ Local Government - Fund
- □ Local Government - Bond Rating Test
- □ Insurance & Risk Retention Group Coverage

30 - DAY REQUEST FOR TANK CLOSURE

O CLOSURE REQUEST

To request a tank closure, mark the Request for Closure oval in Type of Notification in Section A, complete sections B, C, D, E, and mark D. REQUESTING CLOSURE in section F. Complete the remaining sections (G-N) and fill in the requested information below.

PROPOSED CONTRACTOR

CONTRACTOR NAME

MAILING ADDRESS

CITY | STATE

ZIP | TELEPHONE ( ) -

CONTACT PERSON | CERTIFICATION NUMBER

LUST INCIDENT INFORMATION

LUST INCIDENT NUMBER, IF APPLICABLE

DATE INCIDENT REPORTED

*NOTE: Any tank closures must be performed by persons certified by the Indiana State Fire Marshal. City/County Fire Departments, the Indiana State Fire Marshal, and IDEM's UST Section must be notified 14 days prior to closure. Please report to the Leaking Underground Storage Tank Section at (317) 232-8900 if signs of soil or groundwater contamination are observed.

Indiana State Fire Marshal (317) 232-2222

CLAIM FOR PAYMENT FOR MERCURY SWITCHES FROM END-OF-LIFE VEHICLES

State Form 53238 (R2 / 9-07)

Indiana Department of Environmental Management

INSTRUCTIONS:
1. *Use this form to request payment for mercury switches removed from end-of-life vehicles under 329 IAC 11.5.*
2. *Print or type all requested information. Sign and date the certification. IDEM will verify the number of switches shipped with the End of Life Vehicle Solutions/Environmental Quality database.*
3. *Mail the form to Indiana Department of Environmental Management, Office of Land Quality MC 66-30, Mercury Switch Program, 100 North Senate Avenue, Indianapolis, IN 46204-2251*
4. *If you have not already done so, you must submit a Taxpayer Identification Number Request (State Form 23743).*
5. *To receive payments from IDEM you must submit an Automated Direct Deposit Authorization Agreement (State Form 47551).*
6. *For more information or for help completing your claim, contact IDEM's Office of Land Quality at (317) 233-1655.*

Claim Number: (IDEM Use Only)	**MS –** **–**

Motor vehicle recycler information:		
Company name:		
Address:		
City:	State:	ZIP:
Contact person:	Telephone:	

Vehicle salvage license number (from Bureau of Motor Vehicles):	
Number of mercury switches or switch pellets removed and shipped to recycler in this container:	
Number of ABS G-Force sensors removed and shipped to recycler in this container:	
Number of vehicles these switches were removed from:	
Date this container of mercury switches was shipped to the recycler:	

Certification by company official (claim cannot be paid without valid signature):

All convenience switches and ABS G-force sensor switches that were removed and sent for recycling and for which reimbursement is requested in this claim contain mercury. I certify, in accordance with IC 13-30-6-2, that to the best of my knowledge the information in this claim is true and accurate.

Signature:	Print name:
Title:	Date:

FOR IDEM USE ONLY

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.

Annual Mercury Safety Training

Facility Name: _____

Location: _____

Print Name	Sign Name

Comments:_____

_____

_____

_____

Instructor: _____ Date: _____

**Note: An inspector can be any person authorized by the facility owner who has an understanding of the material being covered.*

EPA'S NEW REGULATION CONTROLLING EMISSIONS FROM SWEAT FURNACE OPERATIONS

The U.S. Environmental Protection Agency (EPA) has issued national regulations to control air emissions from secondary aluminum production facilities.These facilities include aluminum scrap shredders, thermal chip dryers, scrap dryers/delacquering kilns/decoating kilns, group 2 furnaces (processing clean charge only and no reactive fluxing), sweat furnaces, dross onlyfurnaces, and rotary dross coolers. This brochure presents a summary of the requirements of the standard for owners and operators of sweat furnaces only (i.e., emission limits, performance testing, and operating and monitoring requirements). The full regulation appeared in the March 23, 2000, edition of the Federal Register [Vol. 65, No. 57, beginning on page 15690].

GENERAL INFORMATION

- What is a sweat furnace?

A sweat furnace is a unit designed and used exclusively to reclaim aluminum from scrap that contains substantial quantities of iron by using heat to separate the low melting point aluminum from the scrap while the higher melting point iron remains in solid form. These units are also commonly known as dry hearth furnaces.

- Where are sweat furnaces located?

Due to their small size and portability, sweat furnaces are common in many industries. They are used to process scrap that cannot be processed in other furnaces. For example, scrap yards use sweat furnaces to reclaim aluminum from many forms of scrap (sheet and cast aluminum), and automotive salvage yards use them to reclaim aluminum from unusable auto parts (such as, transmissions).

- Why are sweat furnaces included in the regulation?

The Clean Air Act directs EPA to regulate emissions of 188 toxic chemicals, which include organic hazardous air pollutants (HAPs), inorganic gaseous HAPs (hydrogen chloride, hydrogen fluoride and chlorine), and particulate HAP metals. Some of these pollutants, including dioxins are known to, or suspected of, causing cancer, and all are harmful to humans. The secondary aluminum regulation helps protect public health by requiring that you reduce air emissions from your sweat furnace to comply with the national limits. EPA estimates that with full compliance with this rule, nationwide toxic emissions would be reduced by about 12,400 tons per year (11,300 megagrams/year). Emissions of other pollutants, such as particulate matter and volatile organic compounds, would also be reduced.

- When must I meet these standards?

If your operation is an existing source (a sweat furnace that began construction or reconstruction prior to February 11, 1999), then you must be in compliance no later than March 24, 2003. On the other hand, if you operate a new source (constructed or reconstructed after February 11, 1999), then you must have complied by March 23, 2000, or upon startup, whichever is later.

- How much will it cost?

Estimates of the average cost for adding an afterburner to a sweat furnace to control dioxin/furan (D/F) emissions range from $8,000 to $58,000, depending on the size of the furnace.

- What happens if I don't comply?

If you fail to comply with the requirements of the rule, you could face legal action under the Clean Air Act. You may be assessed civil penalties of $25,000 per day for non-compliance.

SWEAT FURNACE REQUIREMENTS

- Does this regulation apply to me?

The secondary aluminum production regulation applies to ALL sweat furnace operations regardless of their location and size.

- What emission limits must sweat furnaces meet?

If you are an owner/operator of a sweat furnace, you must control the dioxin /furan (D/F) emissions from each sweat furnace to 0.80 nanogram of D/F toxic equivalent per dry standard cubic meter (3.5 x 10-10 grain per dry standard cubic foot) at 11 percent oxygen. As an alternative, you may operate and maintain an afterburner with a design residence time of 0.8* seconds or greater and an operating temperature of 1600 °F or greater. If you elect to comply with these afterburner requirements, you would not be required to conduct emissions testing to show compliance with the emission limit.

- What operating standards must I meet?

If you choose to install and operate an afterburner with a design residence time of 0.8* seconds or greater and an operating temperature of 1600 °F or greater, then you must maintain the average afterburner temperature at no less than 1600 °F. The afterburner must operate in accordance with your operation maintenance and monitoring plan. However, even if you are using an afterburner, you can choose to comply with the emission limits by conducting an initial compliance test. In this case, you must then maintain the afterburner average operating temperature at the level established during the performance test.
***The rule is being amended to reflect this time.**

- When must I conduct performance tests?

If you choose to demonstrate compliance with the requirements of the regulation by conducting an initial compliance test, then the test must be conducted prior to the compliance deadline. If you choose to comply with the alternative equipment standard, you are not required to conduct emission testing.

- What test methods must I use in conducting performance tests?

The test method required to determine dioxin/furan (D/F) emissions is EPA Reference Method 23. This method and other test methods can be found in the Code of Federal Regulations (CFR), Appendix A, 40 CFR Part 60, or the Emissions Measurement Center (EMC) website at **www.epa.gov/ttn/emc**.

- What are the monitoring requirements for afterburners?

You must operate a device that continuously monitors and records the afterburner operating temperature. This device must be installed at the exit of the afterburner's combustion zone, and it must record the temperature in 15 minute block averages and also determine and record the average temperature for each three-hour block period.

You must prepare and implement for each emission unit, a written Operation Maintenance and Monitoring (OM&M) plan, approved by your permitting authority, that shows how you are complying with the national standards. You must also inspect each afterburner at least once a year and record the results of the inspection. Repairs must be completed in accordance with the OM&M plan. You must maintain files of all information (including all reports and notifications) for at least five years for each affected source with emissions controlled by an afterburner.

STATE OR LOCAL REQUIREMENTS

- How does the new EPA regulation relate to state or local requirements?

Some state or local agencies have existing control requirements that you must continue to meet. Check with your state or local agency for the specific requirements that apply to your sweat furnace operation. Most state and local permit authorities also have operating permit programs (a Clean Air Act requirement under Part 70) that you must comply with. However, under this new regulation for sweat furnaces, EPA has specified that the state or local permit authority has discretion to defer operating permits until December 9, 2004 for sweat furnace operations at area sources of HAPs (i.e., facilities that emit, or have the potential to emit considering controls, less than 10 tons per year of any individual HAP or less than 25 tons per year of any combination of HAPs). This deferral is not automatic, so you should check with your state or local to see if your operation has a deferral.

For Indiana, please contact the EPA Region 5 Office at **(312) 353-6684**.

This pamphlet is intended for general reference only; it is not a full and complete statement of the technical or legal requirements associated with the regulation. A copy of the rule can be obtained from the Federal Register or the EPA's Air Toxics Web site (ATW) rule and implementation page for secondary aluminum at **www.epa.gov/ttn/uatw/alum2nd/alum2pg.html**.
If you need TTN assistance, call (919) 541-5384.

Refrigerant Removal Records

I hereby certify that the refrigerants have been legally removed from the vehicles listed on this page.

Facility Owner: _____ _____ _____
Sign Print Date

All refrigerants were removed at the following location:
Address: _____
_____

Refrigerant Recovered By	Date Removed	Make	Model	Year	VIN

Vehicles Obtained Without Refrigerants

I hereby certify that the vehicles listed on this page arrived at the address below with no refrigerants inside of them (i.e., due to front end damage or prior removal).

Facility Owner: _____ _____ _____
Sign Print Date

Address: _____
_____
_____
_____

Refrigerant Verified Removed By	Date Removed	Make	Model	Year	VIN

RULE 6 NOTICE OF INTENT (NOI) LETTER

State Form 51286 (R5 / 2-08)
Form Approved by State Board of Accounts, 2004
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NOTE:

- This form must be used to apply for a general NPDES permit pursuant to 327 IAC 15-6.
- **Please type or print in ink.**
- Return this form, required addenda, and payment by mail to the IDEM Rule 6 Coordinator at the address listed in the box on the upper-right.

For questions regarding this form, contact:
IDEM – Rule 6 Coordinator
100 North Senate Avenue, Rm 1255
Mail Code 65-42
Indianapolis, IN 46204
Phone: (317) 233-0202 or
(800) 451-6027, ext. 30202 (within Indiana)
Web Access:
http://www.in.gov/idem/permits/water/wastewater/wetwthr/storm/rule6.html

EXCLUSIONS

Permit coverage under 327 IAC 15-6 applies to all entities that:

1. are not required to obtain an individual NPDES permit under 327 IAC 15-2-9(b);
2. meet the general permit rule applicability requirements under 327 IAC 15-2-3;
3. have not received an approved "No Exposure" exclusion for storm water permitting;
4. have a discharge composed entirely of storm water and allowed non-storm water contributions; and
5. operate, maintain, or otherwise have responsibility for an industrial facility meeting the applicability requirements of 327 IAC 15-6-2.

APPLICATION TYPE (*check one*)

☐ Initial NOI letter

☐ Renewal NOI letter

☐ Amended NOI letter

Was there a change of ownership since the last NOI letter?
☐Yes ☐No

PART A: GENERAL INFORMATION FOR FACILITY

1. Facility name:

2. Primary Standard Industrial Classification (SIC) Code for the facility (4 digits):

3. Facility location address:

☐City ☐Town ☐Village **Of:**	ZIP:	County:

4. Longitude and Latitude of the approximate center of the facility to the nearest fifteen (15) seconds

Decimal Longitude: Decimal Latitude:

LONGITUDE			LATITUDE		
Degrees	**Minutes**	**Seconds**	**Degrees**	**Minutes**	**Seconds**
°	'	"	°	'	"

5. On-site Facility Contact name:

6. On-site Facility Contact title:

7. On-site Facility Contact telephone number:

8. On-site Facility Contact facsimile number *(if applicable)*:

9. On-site Facility Contact e-mail address *(if applicable)*:

10. Has the facility been issued a past or present NPDES permit? *(if yes, provide permit numbers)* ☐Yes ☐No

Permit Number(s): IN- IN- IN- IN-

11. Brief narrative description of the industrial processes performed at the facility *(attach additional sheets if necessary)*:

PART B: GENERAL INFORMATION FOR RESPONSIBLE INDIVIDUAL

12. Responsible Individual name:

13. Responsible Individual title:

14. Responsible Individual mailing address:

City:	State:	ZIP:

15. Responsible Individual telephone number:

16. Responsible Individual facsimile number *(if applicable)*:

17. Responsible Individual e-mail address *(if applicable)*:

PART C: (CORPORATIONS ONLY) GENERAL INFORMATION FOR REGISTERED AGENT

18. Registered Agent name:

19. Registered Agent title:

20. Registered Agent mailing address:

City:	State:	ZIP:

21. Registered Agent telephone number:

22. Registered Agent facsimile number *(if applicable)*:

23. Registered Agent e-mail address *(if applicable)*:

PART D: GENERAL INFORMATION FOR STORM WATER DISCHARGE(S) FROM FACILITY

24. Identification of the number and location of each outfall where storm water exposed to industrial activity discharges to a water of the state, including a narrative description of the industrial activity associated with the drainage area of each identified outfall:

25. Identification of any outfalls, listed above in item 24, that are substantially similar *(Include reason as to why outfalls are deemed similar)*:

26. Identification of the outfall(s) to be monitored as representative of all such discharges:

27. Identification of receiving water(s) for the storm water discharge outfall(s) identified above in item 24:

28. Does the facility discharge storm water into a municipal separate storm sewer system (MS4)? *(If yes, provide contact person information)*:
☐**Yes** ☐**No**

Contact person for the MS4 entity:

Phone number for the MS4 entity contact person:

PART E: MATERIALS TO BE SUBMITTED WITH THIS NOI LETTER

► In addition to the information in Parts A, B, C, and D facility representative must provide the following *(check when completed)*:

1) ☐ Proof of publication in a newspaper of largest circulation in the affected area.

PART F: FEES, CERTIFICATION, AND SIGNATURE

- Upon submission of this NOI letter, the responsible individual or registered agent shall pay a fee in the amount of fifty dollars ($50). Make all checks and money orders payable to "IDEM."
- Pursuant to 327 IAC 15, the fee is **NOT**:
  - Transferable from one (1) facility location to another;
  - Transferable from one (1) person to another;
  - Transferable to any other type of permit issued by IDEM; or
  - Refundable.

Unless requested by the responsible individual or registered agent and approved by IDEM within three (3) days of submittal to IDEM or prior to the NOI letter processing by IDEM, whichever is earlier.

- There is also an annual fee of one hundred dollars ($100), for which you will be billed.
- Pursuant to 327 IAC 15, the NOI letter is **NOT**:
  - Transferable from one (1) facility location to another (a new NOI letter is required for each facility location);
  - Transferable from one (1) facility name to another at the same location (a new NOI letter is required for a name change to the facility location).
- Pursuant to 327 IAC 15, the annual fee requirement is terminated:
  - When a written request for the "no exposure" exclusion from the facility is approved by IDEM;
- When a period of five (5) years passes, from the date of the NOI letter submittal. (Within ninety (90) days from the five (5) year permit term ending, a new, reapplication NOI letter must be submitted.).
- Allow a minimum of four (4) weeks for processing the NOI letter information and receipt of your Notice of Sufficiency.
- Make sure you have completed all appropriate sections of this NOI letter and have included all required addenda. Sign and date the NOI letter and return it to the address shown on page one (1) of this NOI letter. Incomplete or incorrect NOI letters will result in a delay in processing and issuance of your Notice of Sufficiency.
- Unless not applicable, all information requested in this NOI letter is MANDATORY for the administration and processing of your permit pursuant to 327 IAC 15-6. All data received will be regarded as a public record.

► The persons listed in "Part B: Responsible Individual" must sign the following certification statement:

"By signing this NOI letter, I hereby certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Type or print Responsible Individual Name: _____

Signature of Responsible Individual: _____ **Date:** _____
(mm/dd/year)

APPENDIX A: SUPPLEMENTARY INSTRUCTIONS

Part A, Item #2: Enter the 4-digit Standard Industrial Classification (SIC) code which identifies the facility's primary activity. SIC codes can be obtained from the Standard Industrial Classification Manual, 1987, by accessing the Occupational Safety and Health Administration (OSHA) web site at http://www.osha.gov/oshstats/sicser.html, or by contacting the Indiana Department of Workforce Development at 1-317-232-7458.

Part A, Item #4: Enter the longitude and latitude of the approximate center of the facility in degrees/minutes/seconds. Longitude and latitude can be obtained from United States Geological Survey (USGS) quadrangle or topographic maps, by calling 1-888-275-8747, or by accessing a locational web site at http://www.geocode.com and conducting a search based on the facility street address.

Longitude and latitude of the approximate center of the facility must be converted to degrees, minutes, and seconds for proper entry on the NOI letter. To convert decimal longitude and latitude to degrees/minutes/seconds, follow the steps in the following example:

Example: Convert decimal latitude 45.1234567 to degrees, minutes, and seconds

a) The numbers to the left of the decimal point are the degrees: 45.
b) To obtain minutes, multiply the first four numbers to the right of the decimal point by 0.006: 1234 x 0.006 = 7.404.
c) The numbers to the left of the decimal point in the result obtained in (b) are the minutes: 7.
d) To obtain seconds, multiply the remaining three numbers to the right of the decimal from the result obtained in (b) by 0.06: 404 x 0.06 = 24.24. Since the numbers to the right of the decimal point are not used, the result is 24 seconds.
e) The conversion for 45.1234567 = 45 degrees, 7 minutes, and 24 seconds.

Part A, Item #11: Enter a brief narrative description of the industrial processes that occur at the facility. This description should include:

a) raw materials;
b) processes (including general chemical additives) utilized to created intermediary or final products; and
c) products created.

To provide an adequate narrative description, please create a similar text format to the following example:

Example: Lead-acid battery reclamation
The facility utilizes a battery breaker and secondary lead smelter to create lead ingots. The lead ingots are sold for use in battery production. The broken battery casings, other solid components, and waste acid are disposed of as wastestreams.

Part B: For purposes of this rule, "responsible individual" means:

(A) For a corporation,
  (1) a president, secretary, treasurer, any vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation; or
  (2) the manager of one or more manufacturing, production, or operating facilities employing more than two hundred fifty (250) persons or having gross annual sales or expenditures exceeding twenty-five million dollars ($25,000,000), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
(B) For a partnership or sole proprietorship,
  (1) a general partner or the proprietor, respectively.

Part C: For purposes of this rule, "registered agent" means an individual who:

(A) is the corporation's agent for service of process, notice, or demand required or permitted by law to be served on the corporation; and
(B) is registered along with a business office with the Indiana Secretary of State's Office.

NPDES FORM 3510-11

United States Environmental Protection Agency
Washington, DC 20460

Form Approved
OMB No. 2040-0211

NO EXPOSURE CERTIFICATION for Exclusion from NPDES Storm Water Permitting

Submission of this No Exposure Certification constitutes notice that the entity identified in Section A does not require permit authorization for its storm water discharges associated with industrial activity in the State identified in Section B under EPA's Storm Water Multi-Sector General Permit due to the existence of a condition of no exposure.

A condition of no exposure exists at an industrial facility when all industrial materials and activities are protected by a storm resistant shelter to prevent exposure to rain, snow, snowmelt, and/or runoff. Industrial materials or activities include, but are not limited to, material handling equipment or activities, industrial machinery, raw materials, intermediate products, by-products, final products, or waste products. Material handling activities include the storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, final product or waste product. A storm resistant shelter is not required for the following industrial materials and activities:

- drums, barrels, tanks, and similar containers that are tightly sealed, provided those containers are not deteriorated and do not leak. "Sealed" means banded or otherwise secured and without operational taps or valves;
- adequately maintained vehicles used in material handling; and
- final products, other than products that would be mobilized in storm water discharges (e.g., rock salt).

A No Exposure Certification must be provided for each facility qualifying for the no exposure exclusion. In addition, the exclusion from NPDES permitting is available on a facility-wide basis only, not for individual outfalls. If any industrial activities or materials are or will be exposed to precipitation, the facility is not eligible for the no exposure exclusion.

By signing and submitting this No Exposure Certification form, the entity in Section A is certifying that a condition of no exposure exists at its facility or site, and is obligated to comply with the terms and conditions of 40 CFR 122.26(g).

ALL INFORMATION MUST BE PROVIDED ON THIS FORM.

Detailed instructions for completing this form and obtaining the no exposure exclusion are provided on pages 3 and 4.

A. Facility Operator Information

1. Name: _____ 2. Phone: _____

3. Mailing Address: a. Street: _____

b. City: _____ c. State: ____ d. Zip Code: _____–____

B. Facility/Site Location Information

1. Facility Name: _____

2. a. Street Address: _____

b. City: _____ c. County: _____

d. State: ____ e. Zip Code: _____–____

3. Is the facility located on Indian Lands? Yes ☐ No ☐

4. Is this a Federal facility? Yes ☐ No ☐

5. a. Latitude: ____ ° ____ ' ____ " b. Longitude: ____ ° ____ ' ____ "

6. a. Was the facility or site previously covered under an NPDES storm water permit? Yes ☐ No ☐

b. If yes, enter NPDES permit number: _____

7. SIC/Activity Codes: Primary: ____ Secondary (if applicable): ____

8. Total size of site associated with industrial activity: _____ acres

9. a. Have you paved or roofed over a formerly exposed, pervious area in order to qualify for the no exposure exclusion? Yes ☐ No ☐

b. If yes, please indicate approximately how much area was paved or roofed over. Completing this question does not disqualify you for the no exposure exclusion. However, your permitting authority may use this information in considering whether storm water discharges from your site are likely to have an adverse impact on water quality, in which case you could be required to obtain permit coverage.

Less than one acre ☐ One to five acres ☐ More than five acres ☐

NO EXPOSURE CERTIFICATION for Exclusion from NPDES Storm Water Permitting

Form Approved
OMB No. 2040-0211

C. Exposure Checklist

Are any of the following materials or activities exposed to precipitation, now or in the foreseeable future? (Please check either "Yes" or "No" in the appropriate box.) **If you answer "Yes" to any of these questions (1) through (11), you are not eligible for the no exposure exclusion.**

		Yes	No
1.	Using, storing or cleaning industrial machinery or equipment, and areas where residuals from using, storing or cleaning industrial machinery or equipment remain and are exposed to storm water	☐	☐
2.	Materials or residuals on the ground or in storm water inlets from spills/leaks	☐	☐
3.	Materials or products from past industrial activity	☐	☐
4.	Material handling equipment (except adequately maintained vehicles)	☐	☐
5.	Materials or products during loading/unloading or transporting activities	☐	☐
6.	Materials or products stored outdoors (except final products intended for outside use [e.g., new cars] where exposure to storm water does not result in the discharge of pollutants)	☐	☐
7.	Materials contained in open, deteriorated or leaking storage drums, barrels, tanks, and similar containers	☐	☐
8.	Materials or products handled/stored on roads or railways owned or maintained by the discharger	☐	☐
9.	Waste material (except waste in covered, non-leaking containers [e.g., dumpsters])	☐	☐
10.	Application or disposal of process wastewater (unless otherwise permitted)	☐	☐
11.	Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the storm water outflow	☐	☐

D. Certification Statement

I certify under penalty of law that I have read and understand the eligibility requirements for claiming a condition of "no exposure" and obtaining an exclusion from NPDES storm water permitting.

I certify under penalty of law that there are no discharges of storm water contaminated by exposure to industrial activities or materials from the industrial facility or site identified in this document (except as allowed under 40 CFR 122.26(g)(2)).

I understand that I am obligated to submit a no exposure certification form once every five years to the NPDES permitting authority and, if requested, to the operator of the local municipal separate storm sewer system (MS4) into which the facility discharges (where applicable). I understand that I must allow the NPDES permitting authority, or MS4 operator where the discharge is into the local MS4, to perform inspections to confirm the condition of no exposure and to make such inspection reports publicly available upon request. I understand that I must obtain coverage under an NPDES permit prior to any point source discharge of storm water from the facility.

Additionally, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Print Name: ______________________________

Print Title: ______________________________

Signature: ______________________________

Date: __________

NPDES FORM 3510-11

Instructions for the NO EXPOSURE CERTIFICATION for Exclusion from NPDES Storm Water Permitting

Form Approved OMB No. 2040-0211

Who May File a No Exposure Certification

Federal law at 40 CFR Part 122.26 prohibits point source discharges of storm water associated with industrial activity to waters of the U.S. without a National Pollutant Discharge Elimination System (NPDES) permit. However, NPDES permit coverage is not required for discharges of storm water associated with industrial activities identified at 40 CFR 122.26(b)(14)(i)-(ix) and (xi) if the discharger can certify that a condition of "no exposure" exists at the industrial facility or site.

Storm water discharges from construction activities identified in 40 CFR 122.26(b)(14)(x) and (b)(15) are not eligible for the no exposure exclusion.

Obtaining and Maintaining the No Exposure Exclusion

This form is used to certify that a condition of no exposure exists at the industrial facility or site described herein. This certification is only applicable in jurisdictions where EPA is the NPDES permitting authority and must be re-submitted at least once every five years.

The industrial facility operator must maintain a condition of no exposure at its facility or site in order for the no exposure exclusion to remain applicable. If conditions change resulting in the exposure of materials and activities to storm water, the facility operator must obtain coverage under an NPDES storm water permit immediately.

Where to File the No Exposure Certification Form

No Exposure Forms sent regular mail:

SW No Exposure Certification (4203M)
USEPA
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Forms sent overnight/express:

SW No Exposure Certification
US EPA East Building, Rm. 7420
1201 Constitution Avenue, NW
Washington, D.C. 20004
(202) 564-9545

Completing the Form

You must type or print, using uppercase letters, in appropriate areas only. Enter only one character per space (i.e., between the marks). Abbreviate if necessary to stay within the number of characters allowed for each item. Use one space for breaks between words. One form must be completed for each facility or site for which you are seeking to certify a condition of no exposure. Additional guidance on completing this form can be accessed at EPA's website: www.epa.gov/npdes/stormwater. Please make sure you have addressed all applicable questions and have made a photocopy for your records before sending the completed form to the above address.

Section A. Facility Operator Information

1. Provide the legal name of the person, firm, public organization, or any other entity that operates the facility or site described in this certification. The name of the operator may or may not be the same as the name of the facility. The operator is the legal entity that controls the facility's operation, rather than the plant or site manager.

2. Provide the telephone number of the facility operator.

3. Provide the mailing address of the operator (P.O. Box numbers may be used). Include the city, state, and zip code. All correspondence will be sent to this address.

Section B. Facility/Site Location Information

1. Enter the official or legal name of the facility or site.

2. Enter the complete street address (if no street address exists, provide a geographic description [e.g., Intersection of Routes 9 and 55]), city, county, state, and zip code. Do not use a P.O. Box number.

3. Indicate whether the facility is located on Indian Lands.

4. Indicate whether the industrial facility is operated by a department or agency of the Federal Government (see also Section 313 of the Clean Water Act).

5. Enter the latitude and longitude of the approximate center of the facility or site in degrees/minutes/seconds. Latitude and longitude can be obtained from United States Geological Survey (USGS) quadrangle or topographic maps, by calling 1-(888) ASK-USGS, or by accessing the Census Bureau at: http://www.census.gov/cgi-bin/gazetteer.

   Latitude and longitude for a facility in decimal form must be converted to degrees (°), minutes ('), and seconds (") for proper entry on the certification form. To convert decimal latitude or longitude to degrees/minutes/seconds, follow the steps in the following example.

   Example: Convert decimal latitude 45.1234567 to degrees (°), minutes ('), and seconds (").

   a) The numbers to the left of the decimal point are the degrees: 45°.

   b) To obtain minutes, multiply the first four numbers to the right of the decimal point by 0.006: 1234 x 0.006 = 7.404.

   c) The numbers to the left of the decimal point in the result obtained in (b) are the minutes: 7'.

   d) To obtain seconds, multiply the remaining three numbers to the right of the decimal from the result obtained in (b) by 0.06: 404 x 0.06 = 24.24. Since the numbers to the right of the decimal point are not used, the result is 24".

   e) The conversion for 45.1234567 = 45° 7' 24".

6. Indicate whether the facility was previously covered under an NPDES storm water permit. If so, include the permit number.

7. Enter the 4-digit SIC code which identifies the facility's primary activity, and second 4-digit SIC code identifying the facility's secondary activity, if applicable. SIC codes can be obtained from the Standard Industrial Classification Manual, 1987.

8. Enter the total size of the site associated with industrial activity in acres. Acreage may be determined by dividing square footage by 43,560, as demonstrated in the following example.

   Example: Convert 54,450 ft^2 to acres

   Divide 54,450 ft^2 by 43,560 square feet per acre:
   54,450 ft^2 ÷ 43,560 ft^2/acre = 1.25 acres.

9. Check "Yes" or "No" as appropriate to indicate whether you have paved or roofed over a formerly exposed, pervious area (i.e., lawn, meadow, dirt or gravel road/parking lot) in order to qualify for no exposure. If yes, also indicate approximately how much area was paved or roofed over and is now impervious area.

Instructions for the NO EXPOSURE CERTIFICATION for Exclusion from NPDES Storm Water Permitting

Form Approved OMB No. 2040-0211

Section C. Exposure Checklist

Check "Yes" or "No" as appropriate to describe the exposure conditions at your facility. If you answer "Yes" to **ANY** of the questions (1) through (11) in this section, a potential for exposure exists at your site and you cannot certify to a condition of no exposure. You must obtain (or already have) coverage under an NPDES storm water permit. After obtaining permit coverage, you can institute modifications to eliminate the potential for a discharge of storm water exposed to industrial activity, and then certify to a condition of no exposure.

Section D. Certification Statement

Federal statutes provide for severe penalties for submitting false information on this application form. Federal regulations require this application to be signed as follows:

For a corporation: by a responsible corporate officer, which means:

(i) president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation, or

(ii) the manager of one or more manufacturing, production, or operating facilities, provided the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures;

For a partnership or sole proprietorship: by a general partner or the proprietor; or

For a municipal, State, Federal, or other public facility: by either a principal executive or ranking elected official.

Paperwork Reduction Act Notice

Public reporting burden for this certification is estimated to average 1.0 hour per certification, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose to provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments regarding the burden estimate, any other aspect of the collection of information, or suggestions for improving this form, including any suggestions which may increase or reduce this burden to: Director, OPPE Regulatory Information Division (2137), USEPA, 401 M Street, SW, Washington, D.C. 20460. Include the OMB control number of this form on any correspondence. Do not send the completed No Exposure Certification form to this address.

RULE 6 STORM WATER POLLUTION PREVENTION PLAN (SWP3) CERTIFICATION CHECKLIST

State Form 51287 (R4 / 2-08)
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

For questions regarding this form, contact:
IDEM – Rule 6 Coordinator
100 North Senate Avenue, Rm 1255
Mail Code 65-42
Indianapolis, IN 46204
Phone: (317) 233-0202 or
(800) 451-6027, ext. 30202 (within Indiana)
Web Access:
http://www.in.gov/idem/permits/water/wastewater/wetwthr/storm/rule6.html

NOTE:

- This form must be used, completed, and submitted within one (1) year after an NOI letter is received by IDEM for permit coverage under a general NPDES permit pursuant to 327 IAC 15-6.
- Return this form by mail to the IDEM Rule 6 Coordinator at the address listed in the box on the upper-right.

PART A: GENERAL INFORMATION FOR FACILITY

1. Facility name:

2. Facility general NPDES Industrial Storm Water Permit Number: INR-

3. Facility location address:

☐City ☐Town ☐Village **Of:**	ZIP:	County:

PART B: RULE 6 CHECKLIST

► Please check the appropriate box when the requirements for each numbered item have been met, or check NA if an item is "not applicable." For some of the numbered items, the requirements must be met and "not applicable" is not provided as an option.

✓	NA	ITEM
☐		**1.** Plan identifies individuals and their corresponding responsibilities for the facility Storm Water Pollution Prevention Team
☐		**2.** Plan contains a copy of the complete NOI letter, which contains:
☐		i) Facility contact information
☐		ii) SIC Code(s)
☐		iii) Facility longitude and latitude
☐		iv) Receiving water(s)
☐	☐	v) The identification of past and present NPDES permits
☐	☐	vi) The identification of the MS4 receiving the storm water discharge(s)
☐		vii) Narrative description of industrial processes at facility
☐		viii) Responsible Individual contact information
☐	☐	ix) Registered Agent contact information
☐		x) Outfall description, which identifies substantially similar outfall discharges and monitoring points
☐		xi) Proof of publication
☐	☐	**3.** Plan contains a soils map, which indicates the types of soils found on the facility property. The boundaries of the facility property have been outlined, in a contrasting color. If a facility's property only has impervious surfaces, the soils map requirement can be omitted.
☐		**4.** Graphical representation which indicates[1]:
☐		i) On-site drainage and discharge conveyances
☐		ii) Adjacent property drainage and discharge conveyances
☐	☐	iii) On-site and adjacent property water bodies
☐		iv) Outline of the drainage area for each storm water outfall
☐		v) Outline of the facility property indicating directional flows of surface drainage patterns
☐		vi) Outline of the impervious surfaces, with estimate of impervious and pervious surfaces square footage for each drainage area
☐	☐	vii) On-site injection wells
☐	☐	viii) On-site wells used as potable water sources
☐	☐	ix) Existing structural control measures
☐	☐	x) Existing and/or historical underground and aboveground storage tank locations[2]
☐	☐	xi) Permanently designated plowed and/or dumped snow storage locations[2]
☐	☐	xii) Loading and unloading areas for solid and/or liquid bulk materials[2]
☐	☐	xiii) Existing and/or historical outdoor storage areas for raw materials, intermediary products, final products, or waste materials[2]
☐	☐	xiv) Existing and/or historical outdoor storage areas for fuels, processing equipment, and other containerized materials[2]
☐	☐	xv) Outdoor processing areas[2]
☐	☐	xvi) Dust or particulate generating process areas[2]
☐	☐	xvii) Outdoor waste storage and/or disposal areas[2]
☐	☐	xviii) Pesticide and/or herbicide application areas[2]
☐	☐	xix) Vehicular access roads[2]
☐		**5.** Area map which indicates:
☐		i) Topographic relief or similar elevations
☐		ii) Facility outlined in contrasting color
☐		iii) Receiving water(s)
☐	☐	iv) Drinking water wells within a ¼-mile radius

(Continued on page 2)

[1] The on-site mapping of items listed in (x) through (xix) is required only in those areas that generate storm water discharges exposed to industrial activity and have a reasonable potential for storm water exposure to pollutants.
[2] The mapping of historical locations is only required if the historical locations have a reasonable potential for storm water exposure to historical pollutants.

PART B: RULE 6 CHECKLIST

► Please check the appropriate box when the requirements for each numbered item have been met, or check NA if an item is "not applicable." For some of the numbered items, the requirements must be met and "not applicable" is not provided as an option.

✓	NA	ITEM
☐		**6.** Plan contains a narrative description of potential pollutant source areas[3]
☐		a) Descriptions have been created for all existing and/or historical areas identified as being a potential source of storm water exposure to pollutants.
		b) The descriptions for EACH area includes:
☐		i) Type and typical quantity of materials present in the area
☐		ii) Methods of storage, including presence of any secondary containment measures
☐	☐	iii) Remedial actions undertaken in the area to eliminate pollutant sources or exposure of storm water to those sources
☐	☐	iv) Spill or leak history in the area[3]
☐	☐	(1) Date and type of material released
☐	☐	(2) Estimated volume released
☐	☐	(3) Description of remedial actions undertaken
☐		c) Where the chemical or material can be exposed to storm water, area contains a risk identification analysis of chemicals or materials stored or used within the area, which includes:
☐		i) Toxicity data of chemicals and/or materials used within the area, referencing appropriate MSDS locations
☐		ii) Frequency and typical quantity of chemicals and/or materials stored in the area
☐		iii) Potential ways storm water discharges may be exposed to chemicals and/or materials
☐		iv) Likelihood of the chemicals and/or materials to come into contact with storm water
☐		**7.** Plan contains a narrative description of existing and planned management practices and measures to improve the quality of, or eliminate, storm water run-off leaving the facility property
☐	☐	a) Descriptions have been created for all existing and/or historical areas identified as being a potential source of storm water exposure to pollutants, including those areas listed in the graphical representation required by the SWP3. The description includes:
☐	☐	i) Existing and planned structural and nonstructural control practices and measures for EACH area
☐	☐	ii) Any treatment the storm water receives prior to leaving the facility property or entering a water of the state
☐	☐	iii) Ultimate disposal of any solid or fluid wastes collected in structural control measures
☐	☐	b) Specific control practices and measures are utilized, and include:
☐	☐	i) Identification of areas which have a high potential for significant soil erosion, including implementation of erosion control measures
☐	☐	ii) Plan created to reduce exposure of storm water to storage piles of sand, salt, or other commercial/industrial materials
☐	☐	iii) Storage piles of sand, salt, or other commercial/industrial materials are stored in a manner to reduce the potential for polluted storm water run-off
☐		c) The facility has a written preventative maintenance program
☐		i) Implementation of good housekeeping practices to reduce the potential for storm water contact with pollutants
☐	☐	ii) Documentation of storm water control measure maintenance
☐	☐	iii) Documentation of the inspection and testing of facility equipment and systems that have potential exposure to storm water
☐		iv) Documentation of quarterly storm water control measure inspections
☐		v) Documentation of quarterly storm water run-off conveyances inspections
☐		vi) Documentation of annual training for all employees that have the potential to engage in industrial activities that impact storm water quality
☐		d) The facility has a written spill response program
☐	☐	i) Location, description, and quantity of all response materials and equipment
☐		ii) Response procedures for facility personnel
☐		iii) Contact information for reporting spills, both for facility staff and external emergency response entities
☐		e) The facility has a written nonstorm water assessment program
☐		i) Certification letter stating that storm water discharges from the facility property or entering a water of the state have been evaluated for the presence of illicit discharges and non-storm water contributions
☐	☐	ii) Detergent or solvent-based washing of equipment or vehicles that would allow washwater additives to enter any storm drainage system or receiving water shall not be allowed at the facility, and the corrective action is documented in the written nonstorm water assessment program
☐	☐	iii) Maintenance area floor drains with the potential for maintenance fluids or other materials to enter storm sewers are sealed, connected to a sanitary sewer with prior authorization, or the discharge is permitted under an appropriate NPDES wastewater permit, and the corrective action is documented in the written nonstorm water assessment program
☐		iv) For conducting the nonstorm water assessment, a description of the method used, the date of any testing, and the on-site drainage points that were directly observed during a test
☐		**8.** Plan contains the analytical results of run-off monitoring
☐		a) Monitoring data includes field data sheets, chain-of-custody forms, and laboratory results
☐	☐	b) Comparison created after the results of two sample monitoring events is available
☐	☐	i) Pollutant investigated when reductions are not indicated in the comparison, where appropriate
☐	☐	ii) Practices and/or measures implemented as a result of the investigation are documented
☐	☐	**9.** If applicable, plan references other facility pertinent plans (e.g. Operations and Maintenance, Spill Prevention Control and Countermeasures, or Risk Contingency Plans)
☐		**10.** Plan has been certified by a qualified professional
☐		**11.** Plan is retained and available at the facility
☐		**12.** Plan has been completed and implemented 365 days after submission of a timely-submitted NOI letter, or prior to initiation of operations at the facility

[3] Spill or leak history shall date back for a period of three (3) years from the date of the NOI letter, in the identified area, for materials spilled outside of secondary containment structures and impervious surfaces in excess of their reportable quantity. In subsequent permit terms, the history shall date back for a period of five (5) years from the date of the NOI letter.

PART C: GENERAL INFORMATION REGARDING THE SWP3

- The SWP3 must be reviewed periodically for changes and improvements at the facility. As a minimum, this review should be conducted annually.
  - The dates of all SWP3 reviews should be documented in the SWP3.
  - As changes and improvements to the original SWP3 are made, the SWP3 must be updated, and retained and available at the facility.
- The SWP3 checklist shall be completed and submitted to IDEM:
  - Within 365 days after submission of an initial, renewal, or amended NOI letter; or
  - Upon the written or verbal request of an IDEM representative.

PART D: CERTIFICATION AND SIGNATURE

- Make sure you have completed all appropriate sections of this SWP3 checklist. Sign and date the bottom of this form and return it to the address shown on page one (1) of this SWP3 checklist.
- All information requested in this SWP3 checklist is MANDATORY, unless noted otherwise, for the administration and processing of your permit pursuant to 327 IAC 15-6. All data received will be regarded as a public record.

► The person referenced in PART A, Item #10 of this form (Qualified Professional) must sign the following certification statement:

"By signing this SWP3 checklist, I hereby certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Type or print Qualified Professional Name: _____

Signature of Qualified Professional: _____ **Date:** _____ *(mm/dd/year)*

Type or print Responsible Individual Name: _____

Signature of Responsible Individual: _____ **Date:** _____ *(mm/dd/year)*

Good Housekeeping Inspection Checklist

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

Date _____ Inspected by _____ Title _____

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		
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 in an appropriately organized manner		

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.

BMP	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 possible 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?			

Analytical Testing Labs

Envision Laboratories
1439 Sadlier Circle West Drive
Indianapolis, IN 46239
317-351-8632

Test America
6964 Hillsdale Court
Indianapolis, IN 46520
317-842-4261

Astbury Water Technology, Inc.
5933 West 71st Street
Indianapolis, IN 46278
317-290-1471

Pace Analytical Services, Inc.
7726 Moller Road
Indianapolis, IN 46268
317-875-5894

Environmental Consulting Firms

SES Environmental
320G M St
Bedford, IN 47421
Phone: (812) 278-9584

Pratter Environmental Service Incorporated
1615 Treadwell Ln
Bloomington, IN 47408-1200
Phone: (812) 336-8477

Fields Environmental Incorporated
220 E Wylie Rd
Bloomington, IN 47408
Phone: (812) 876-1333

Bynum Fanyo Environmental Incorporated
528 N Walnut St
Bloomington, IN 47404-3804
Phone: (812) 332-3791

DECA Environmental & Associates
410 1st. Ave. N.E.
Carmel, IN 46032
(317) 575-0095 Off.
(317) 575-0096 Fax
(317) 919-0491 Cell
deca@indy.net
www.DECAEnvironmental.com

Cornerstone Environmental
880 Lennox Ct
Zionsville, IN 46077-9179
(317) 733-2481

Keramida Environmental Incorporated
330 N College Ave
Indianapolis, IN 46202-3613
(317) 685-6600

SES Environmental
7946 Zionsville Rd
Indianapolis, IN 46268-1649
(317) 334-1997

Astbury Environmental Engnrng
5645 W 79TH St
Indianapolis, IN 46278-1711
(317) 472-0999

American Environmental Corporation
8500 Georgetown Rd
Indianapolis, IN 46268-1647
(317) 871-4090

August Mack Environmental Incorporated
8007 Castleton Rd
Indianapolis, IN 46250-2004
(317) 579-7400

Sesco Group
1426 W 29TH St
Indianapolis, IN 46208-4993
(317) 347-9590

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.

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

Comments: _____

_____

_____

_____

Instructor: _____ Date: _____

**Note: An inspector can be any person authorized by the facility owner who has an understanding of the material being covered.*

DVD

To assist you in participating in IDEM's *Auto Salvage Recycler Program*, a DVD has been included with this workbook.

This DVD is designed to walk you through the information contained in this workbook and help answer some questions you have. If you would like free, confidential, environmental assistance with this program, call IDEM's *Compliance and Technical Assistance Program* (CTAP) at (800) 988-7901 or (317) 232-8172.

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Appendix F

Statistical Results: Primary Measures

Indiana DEM Auto Salvage ERP

Questions Analyzed: Performance Measures (All Primary)

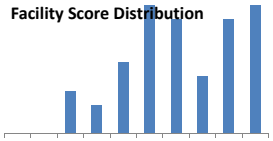
90% Confidence Level

Round 1 of Random Inspections

48 facilities eligible for this set of questions

Measures Summarizing Performance across All Listed Questions

	Confidence Intervals (% with Preferred Response)			
	50%	Lower Bound	Observed	Upper Bound
Average Facility Score*		60.3%	**65.5%**	70.8%
Median Facility Score		nc	**60.0%**	nc
Aggregate Achievement Rate*		nc	**64.8%**	nc
"Full Achievement" Rate (Achievement Rate across All Measures*)		6.9%	**12.5%**	22.1%
Percent of Facilities Achieving At Least One Measure		94.7%	**100.0%**	100.0%



Results Associated with Individual Questions

	Question Metadata (For Filtering)			Confidence Intervals (% with Preferred Response)			Counts of Responses		
Number & Nickname	Compliance Question?	Priority?	Issue/Medium						
Air_Q01: Open Burning	Compliance	1	Air	80.4%	**89.6%**	94.6%	43	48	0,0
Air_Q07: Refrigerants Discharged	Compliance	1	Air	80.1%	**91.2%**	96.2%	31	34	14,0
Fluids_Q01: Spills	Compliance	1	Fluids	53.2%	**64.6%**	74.4%	31	48	0,0
Mercury_Q02: Remove Switches	Compliance	1	Mercury	40.8%	**52.2%**	63.4%	24	46	0,2
Oil_Q01: Container Condition	Compliance	1	Oil	80.7%	**90.5%**	95.4%	38	42	0,6
Solid Waste_Q01: Open Dumping	Compliance	1	Solid Waste	70.8%	**81.3%**	88.4%	39	48	0,0
Waste Tires_Q02: Open Dumping	Compliance	1	Waste Tires	66.2%	**77.1%**	85.0%	37	48	0,0
Water_Q07: NOI submitted	Compliance	1	Water	28.0%	**39.0%**	51.4%	16	41	1,6
Water_Q09: SWP3	Compliance	1	Water	22.2%	**32.5%**	45.0%	13	40	1,7
Water_Q13: Storm Water Samples Submitted	Compliance	1	Water	15.9%	**25.0%**	37.2%	10	40	5,3

*For info, see the States ERP Consortium's Guide to Reporting ERP Results.

Notes: (1) Confidence intervals calculated based on EPA Results Analyzer 2007.

(2) Stat. significance based on confidence interval excluding zero.

(3) Higher proportions/scores indicate better performance.

(4) "nc" means "not calculated."

Indiana DEM Auto Salvage ERP

Questions Analyzed: Performance Measures (All Primary)

90% Confidence Level

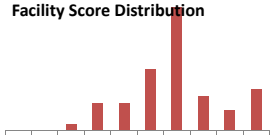
Round 2 of Random Inspections

50 facilities eligible for this set of questions

Measures Summarizing Performance across All Listed Questions

	Confidence Intervals (% with Preferred Response)			
	50%	Lower Bound	Observed	Upper Bound
Average Facility Score*		57.2%	**61.3%**	65.4%
Median Facility Score		nc	**60.0%**	nc
Aggregate Achievement Rate*		nc	**61.0%**	nc
"Full Achievement" Rate (Achievement Rate across All Measures*)		2.6%	**6.0%**	13.9%
Percent of Facilities Achieving At Least One Measure		94.9%	**100.0%**	100.0%

Facility Score Distribution



Results Associated with Individual Questions

	Question Metadata (For Filtering)			Confidence Intervals (% with Preferred Response)				Counts of Responses		
Number & Nickname	Compliance Question?	Priority?	Issue/Medium	50%	Lower Bound	Observed	Upper Bound	Preferred	Eligible (n)	N/A, Invalid
Air_Q01: Open Burning	Compliance	1	Air		86.1%	**94.0%**	97.4%	47	50	0,0
Air_Q07: Refrigerants Discharged	Compliance	1	Air		78.3%	**88.4%**	93.9%	38	43	7,0
Fluids_Q01: Spills	Compliance	1	Fluids		59.0%	**70.0%**	78.9%	35	50	0,0
Mercury_Q02: Remove Switches	Compliance	1	Mercury		49.2%	**60.9%**	71.3%	28	46	4,0
Oil_Q01: Container Condition	Compliance	1	Oil		94.4%	**100.0%**	100.0%	46	46	1,3
Solid Waste_Q01: Open Dumping	Compliance	1	Solid Waste		69.7%	**80.0%**	87.3%	40	50	0,0
Waste Tires_Q02: Open Dumping	Compliance	1	Waste Tires		67.5%	**78.0%**	85.6%	39	50	0,0
Water_Q07: NOI submitted	Compliance	1	Water		16.0%	**24.0%**	34.7%	12	50	0,0
Water_Q09: SWP3	Compliance	1	Water		8.4%	**14.6%**	24.5%	7	48	0,2
Water_Q13: Storm Water Samples Submitted	Compliance	1	Water		0.6%	**2.1%**	8.9%	1	47	0,3

*For info, see the States ERP Consortium's Guide to Reporting ERP Results.

Notes: (1) Confidence intervals calculated based on EPA Results Analyzer 2007.

(2) Stat. significance based on confidence interval excluding zero.

(3) Higher proportions/scores indicate better performance.

(4) "nc" means "not calculated."

Indiana DEM Auto Salvage ERP

Questions Analyzed: Performance Measures (All Primary)

90% Confidence Level

Performance Change (Round 2 minus Round 1)

# of facilities eligible for this set of questions: Round 1, 48; Round 2, 50

Measures Summarizing Performance across All Listed Questions

	Confidence Interval for Performance Change (Percentage Points)					Observed %	
	-50 0 +50	Statistically Significant?	Lower Bound	Observed	Upper Bound	Round 1	Round 2
Average Facility Score*		no	-10.8	**-4.2**	2.4	65.5%	61.3%
Median Facility Score		nc	nc	**0.0**	nc	60.0%	60.0%
Aggregate Achievement Rate*		nc	nc	**-3.8**	nc	**64.8%**	**61.0%**
"Full Achievement" Rate (Achievement Rate across All Measures*)		no	-15.8	**-6.5**	2.8	12.5%	6.0%
Percent of Facilities Achieving At Least One Measure		no	0.0	**0.0**	0.0	100.0%	100.0%

Results Associated with Individual Questions

	Question Metadata (For Filtering)			Confidence Interval for Performance Change (Percentage Points)				Observed %	
Number & Nickname	Compliance Question?	Priority?	Issue/Medium	-50 0 +50	Statistically Significant?	Lower Bound	Observed	Upper Bound	Round 1	Round 2
Air_Q01: Open Burning	Compliance	1	Air		no	-4.4	**4.4**	13.2	89.6%	94.0%
Air_Q07: Refrigerants Discharged	Compliance	1	Air		no	**-13.9**	**-2.8**	**8.3**	**91.2%**	**88.4%**
Fluids_Q01: Spills	Compliance	1	Fluids		no	-9.6	**5.4**	20.4	64.6%	70.0%
Mercury_Q02: Remove Switches	Compliance	1	Mercury		no	-7.7	**8.7**	25.1	52.2%	60.9%
Oil_Q01: Container Condition	Compliance	1	Oil		**YES**	2.3	**9.5**	16.8	90.5%	100.0%
Solid Waste_Q01: Open Dumping	Compliance	1	Solid Waste		no	-13.9	**-1.3**	11.4	81.3%	80.0%
Waste Tires_Q02: Open Dumping	Compliance	1	Waste Tires		no	-12.5	**0.9**	14.3	77.1%	78.0%
Water_Q07: NOI submitted	Compliance	1	Water		no	-30.5	**-15.0**	0.5	39.0%	24.0%
Water_Q09: SWP3	Compliance	1	Water		**YES**	-32.3	**-17.9**	-3.5	32.5%	14.6%
Water_Q13: Storm Water Samples Submitted	Compliance	1	Water		**YES**	-34.4	**-22.9**	-11.4	25.0%	2.1%

*For info, see the States ERP Consortium's Guide to Reporting ERP Results.

Notes: (1) Confidence intervals calculated based on EPA Results Analyzer 2007.

(2) Stat. significance based on confidence interval excluding zero.

(3) Higher proportions/scores indicate better performance.

(4) "nc" means "not calculated."

Appendix G

Statistical Results: All Measures

Indiana DEM Auto Salvage ERP

Questions Analyzed: Performance Measures (All)

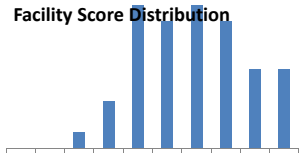
90% Confidence Level

Round 1 of Random Inspections

48 facilities eligible for this set of questions

Measures Summarizing Performance across All Listed Questions

	Summary Results			
	50%	Lower Bound	Observed	Upper Bound
Average Facility Score*		59.1%	**63.4%**	67.7%
Median Facility Score		nc	**63.1%**	nc
Aggregate Achievement Rate*		nc	**64.4%**	nc
"Full Achievement" Rate (Achievement Rate across All Measures*)		0.0%	**0.0%**	5.3%
Percent of Facilities Achieving At Least One Measure		94.7%	**100.0%**	100.0%



Results Associated with Individual Questions

	Question Metadata (For Filtering)			% of Facilities with Preferred Response				Counts of Responses		
Number & Nickname	Compliance Question?	Priority?	Issue/Medium	50%	Lower Bound	Observed	Upper Bound	Preferred	Eligible (n)	N/A, Invalid
Air_Q01: Open Burning	Compliance	1	Air		80.4%	**89.6%**	94.6%	43	48	0,0
Air_Q02: Solvents Used	Vol	2	Air		64.0%	**75.0%**	83.3%	36	48	0,0
Air_Q02a: Degreaser Covers Closed	Compliance	2	Air		76.9%	**100.0%**	100.0%	9	9	36,3
Air_Q02b: Solvent Containers Closed	Compliance	2	Air		70.0%	**91.7%**	98.0%	11	12	36,0
Air_Q03: Dust Generated	Compliance	2	Air		94.7%	**100.0%**	100.0%	48	48	0,0
Air_Q04: Sweat Furnace	Compliance	2	Air		94.7%	**100.0%**	100.0%	48	48	0,0
Air_Q05: Refrigerant Removal Records	Compliance	2	Air		14.2%	**22.2%**	33.4%	10	45	2,1
Air_Q06: EPA Approved Device	Compliance	2	Air		50.6%	**63.9%**	75.3%	23	36	4,8
Air_Q07: Refrigerants Discharged	Compliance	1	Air		80.1%	**91.2%**	96.2%	31	34	14,0
Air_QB01: Refrigerants Removed Prior to Storage	Vol	2	Air		30.0%	**40.9%**	52.8%	18	44	2,2
Air_QB02: Employees Trained	Vol	2	Air		51.0%	**64.7%**	76.3%	22	34	5,9
Air_QB03: AC openings Sealed	Vol	2	Air		54.4%	**70.8%**	83.1%	17	24	11,13
Air_QB04: Not overfilled	Vol	2	Air		77.0%	**91.3%**	96.9%	21	23	11,14
Fluids_Q01: Spills	Compliance	1	Fluids		53.2%	**64.6%**	74.4%	31	48	0,0
Fluids_Q01a: Spills Reported	Compliance	2	Fluids		0.0%	**0.0%**	14.5%	0	16	32,0
Fluids_QB02: Removed over containment	Vol	2	Fluids		54.0%	**65.9%**	76.0%	29	44	1,3
Fluids_QB03: Batteries Removed	Vol	2	Fluids		67.9%	**78.7%**	86.4%	37	47	0,1
Fluids_QB04: Stored inside	Vol	2	Fluids		69.0%	**80.0%**	87.6%	36	45	1,2
Fluids_QB05: Crusher in containment	Vol	2	Fluids		22.2%	**34.5%**	49.4%	10	29	2,17
Fluids_QB06: Windshield wiper fluid removed	Vol	2	Fluids		24.8%	**34.8%**	46.4%	16	46	1,1
Fluids_QB07: Containers inspected	Vol	2	Fluids		35.8%	**46.8%**	58.1%	22	47	0,1
Fluids_QB08: Lids closed	Vol	2	Fluids		67.9%	**78.7%**	86.4%	37	47	0,1
Fluids_QB09: Containers Labeled	Vol	2	Fluids		43.9%	**55.3%**	66.2%	26	47	0,1
Fluids_QB1: Removed before storing	Vol	2	Fluids		39.8%	**51.1%**	62.2%	24	47	0,1
Fluids_QB10: Containers inside	Vol	2	Fluids		39.8%	**51.1%**	62.2%	24	47	0,1
Fluids_QB11: Empty drums storage	Vol	2	Fluids		76.0%	**86.4%**	92.5%	38	44	0,4
Fluids_QB12: Parts stored inside	Vol	2	Fluids		50.4%	**62.2%**	72.6%	28	45	0,3
Fluids_QB13: Floor drains closed	Vol	2	Fluids		74.4%	**87.1%**	93.8%	27	31	0,17
Hazardous Waste_Q01: Unknown Material	Compliance	2	Hazardous Waste		82.9%	**91.7%**	95.9%	44	48	0,0
Hazardous Waste_Q02: Hazardous Waste Quantity	Compliance	2	Hazardous Waste		94.3%	**100.0%**	100.0%	45	45	1,2
Mercury_Q02: Remove Switches	Compliance	1	Mercury		40.8%	**52.2%**	63.4%	24	46	0,2
Mercury_Q03: Stored Correctly	Compliance	2	Mercury		60.1%	**75.0%**	85.5%	21	28	5,15
Mercury_Q04: Container Condition	Compliance	2	Mercury		61.5%	**76.9%**	87.3%	20	26	8,14
Mercury_Q05: Labeled Universal Waste	Compliance	2	Mercury		58.8%	**74.1%**	85.0%	20	27	7,14
Mercury_Q06: On-sited more than 1 Year	Compliance	2	Mercury		84.6%	**96.2%**	99.0%	25	26	7,15
Mercury_Q07: Removal Records	Compliance	2	Mercury		23.9%	**37.0%**	52.5%	10	27	7,14
Mercury_Q08: Safety Devices	Compliance	2	Mercury		42.2%	**57.1%**	70.9%	16	28	6,14
Mercury_Q09: Employees Trained	Compliance	2	Mercury		31.1%	**44.8%**	59.4%	13	29	8,11
Oil_Q01: Container Condition	Compliance	1	Oil		80.7%	**90.5%**	95.4%	38	42	0,6
Oil_Q02: Containers Labeled	Compliance	2	Oil		40.4%	**52.4%**	64.1%	22	42	0,6
Oil_Q03a: Self Generated	Compliance	2	Oil		60.2%	**83.3%**	94.2%	10	12	36,0
Oil_Q04a: Non Registered Transport Methods	Compliance	2	Oil		0.0%	**0.0%**	47.4%	0	3	45,0
Oil_Q05a: SPCC Plan	Compliance	2	Oil		0.0%	**0.0%**	40.3%	0	4	44,0
Solid Waste_Q01: Open Dumping	Compliance	1	Solid Waste		70.8%	**81.3%**	88.4%	39	48	0,0
Solid Waste_QB01a: Eliminate Asbestos Exposure	Vol	2	Solid Waste		68.9%	**100.0%**	100.0%	6	6	42,0
Solid Waste_QB02a: Safely Remove	Vol	2	Solid Waste		65.3%	**90.0%**	97.7%	9	10	38,0
UST_Q01a: Not Registered	Compliance	2	UST		N/A	**N/A**	N/A	0	0	N/A,N/A
Waste Tires_Q01a: Registration	Compliance	2	Waste Tires		0.0%	**0.0%**	27.9%	0	7	41,0
Waste Tires_Q02: Open Dumping	Compliance	1	Waste Tires		66.2%	**77.1%**	85.0%	37	48	0,0
Waste Tires_Q03: Fire Hazard	Compliance	2	Waste Tires		90.5%	**97.7%**	99.4%	43	44	0,4

* These measures are explained in the States ERP Consortium's Guide to Reporting ERP Results.

Indiana DEM Auto Salvage ERP

Questions Analyzed: Performance Measures (All)

90% Confidence Level

Round 1 of Random Inspections

48 facilities eligible for this set of questions

				Summary Results						
Waste Tires_Q04: Water Accumulation	Compliance	2	Waste Tires	45.0%	**57.1%**	68.4%	24	42	0,6
Waste Tires_Q05: Vectors	Compliance	2	Waste Tires	73.8%	**85.0%**	91.7%	34	40	3,5
Waste Tires_Q06a: Delivery Location	Compliance	2	Waste Tires	85.5%	**100.0%**	100.0%	16	16	32,0
Waste Tires_Q06b: Manifests	Compliance	2	Waste Tires	60.2%	**83.3%**	94.2%	10	12	34,2
Water_Q02: Construction Permit	Compliance	2	Water	N/A	**N/A**	N/A	0	0	N/A,N/A
Water_Q03: Soil Build Up	Compliance	2	Water	94.7%	**100.0%**	100.0%	48	48	0,0
Water_Q07: NOI submitted	Compliance	1	Water	28.0%	**39.0%**	51.4%	16	41	1,6
Water_Q07a: NOI accurate	Compliance	2	Water	22.4%	**33.3%**	46.6%	12	36	5,7
Water_Q08: SWP3 Checklist submitted	Compliance	2	Water	22.2%	**32.5%**	45.0%	13	40	1,7
Water_Q09: SWP3	Compliance	1	Water	22.2%	**32.5%**	45.0%	13	40	1,7
Water_Q10: Good Housekeeping	Compliance	2	Water	18.0%	**27.5%**	39.9%	11	40	5,3
Water_Q11: Quarterly Inspection	Compliance	2	Water	12.3%	**20.5%**	32.5%	8	39	6,3
Water_Q12: Annual employee training	Compliance	2	Water	12.0%	**20.0%**	31.8%	8	40	5,3
Water_Q13: Storm Water Samples Submitted	Compliance	1	Water	15.9%	**25.0%**	37.2%	10	40	5,3
Water_Q13a: Contamination	Compliance	2	Water	56.9%	**76.5%**	88.8%	13	17	14,17
Water_Q13b: Contamination eliminated	Compliance	2	Water	0.0%	**0.0%**	40.3%	0	4	44,0

* These measures are explained in the States ERP Consortium's Guide to Reporting ERP Results.

Indiana DEM Auto Salvage ERP

Questions Analyzed: Performance Measures (All)

90% Confidence Level

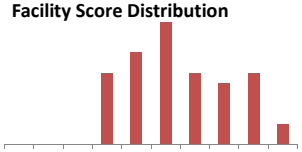
Round 2 of Random Inspections

50 facilities eligible for this set of questions

Measures Summarizing Performance across All Listed Questions

	Summary Results			
	50%	Lower Bound	Observed	Upper Bound
Average Facility Score*		54.9%	**58.8%**	62.8%
Median Facility Score		nc	**54.8%**	nc
Aggregate Achievement Rate*		nc	**59.3%**	nc
"Full Achievement" Rate (Achievement Rate across All Measures*)		0.0%	**0.0%**	5.1%
Percent of Facilities Achieving At Least One Measure		94.9%	**100.0%**	100.0%

Facility Score Distribution



Results Associated with Individual Questions

	Question Metadata (For Filtering)			% of Facilities with Preferred Response				Counts of Responses		
Number & Nickname	Compliance Question?	Priority?	Issue/Medium	50%	Lower Bound	Observed	Upper Bound	Preferred	Eligible (n)	N/A, Invalid
Air_Q01: Open Burning	Compliance	1	Air		86.1%	**94.0%**	97.4%	47	50	0,0
Air_Q02: Solvents Used	Vol	2	Air		61.1%	**72.0%**	80.7%	36	50	0,0
Air_Q02a: Degreaser Covers Closed	Compliance	2	Air		81.6%	**100.0%**	100.0%	12	12	37,1
Air_Q02b: Solvent Containers Closed	Compliance	2	Air		62.7%	**84.6%**	94.6%	11	13	36,1
Air_Q03: Dust Generated	Compliance	2	Air		94.9%	**100.0%**	100.0%	50	50	0,0
Air_Q04: Sweat Furnace	Compliance	2	Air		94.9%	**100.0%**	100.0%	50	50	0,0
Air_Q05: Refrigerant Removal Records	Compliance	2	Air		19.7%	**28.6%**	39.6%	14	49	1,0
Air_Q06: EPA Approved Device	Compliance	2	Air		48.1%	**61.8%**	73.7%	21	34	13,3
Air_Q07: Refrigerants Discharged	Compliance	1	Air		78.3%	**88.4%**	93.9%	38	43	7,0
Air_QB01: Refrigerants Removed Prior to Storage	Vol	2	Air		25.6%	**35.4%**	46.8%	17	48	2,0
Air_QB02: Employees Trained	Vol	2	Air		43.9%	**55.6%**	66.6%	25	45	2,3
Air_QB03: AC openings Sealed	Vol	2	Air		33.6%	**45.9%**	58.8%	17	37	10,3
Air_QB04: Not overfilled	Vol	2	Air		56.7%	**71.0%**	81.9%	22	31	12,7
Fluids_Q01: Spills	Compliance	1	Fluids		59.0%	**70.0%**	78.9%	35	50	0,0
Fluids_Q01a: Spills Reported	Compliance	2	Fluids		0.0%	**0.0%**	16.2%	0	14	36,0
Fluids_QB02: Removed over containment	Vol	2	Fluids		48.1%	**59.6%**	70.0%	28	47	1,2
Fluids_QB03: Batteries Removed	Vol	2	Fluids		67.5%	**78.0%**	85.6%	39	50	0,0
Fluids_QB04: Stored inside	Vol	2	Fluids		73.1%	**83.3%**	90.0%	40	48	1,1
Fluids_QB05: Crusher in containment	Vol	2	Fluids		11.4%	**20.7%**	35.0%	6	29	0,21
Fluids_QB06: Windshield wiper fluid removed	Vol	2	Fluids		25.0%	**34.7%**	45.9%	17	49	1,0
Fluids_QB07: Containers inspected	Vol	2	Fluids		48.2%	**60.0%**	70.7%	27	45	4,1
Fluids_QB08: Lids closed	Vol	2	Fluids		65.6%	**76.6%**	84.7%	36	47	1,2
Fluids_QB09: Containers Labeled	Vol	2	Fluids		38.7%	**50.0%**	61.3%	23	46	2,2
Fluids_QB1: Removed before storing	Vol	2	Fluids		35.4%	**46.0%**	57.0%	23	50	0,0
Fluids_QB10: Containers inside	Vol	2	Fluids		50.2%	**61.7%**	72.0%	29	47	1,2
Fluids_QB11: Empty drums storage	Vol	2	Fluids		61.0%	**73.2%**	82.5%	30	41	3,6
Fluids_QB12: Parts stored inside	Vol	2	Fluids		38.4%	**50.0%**	61.6%	22	44	1,5
Fluids_QB13: Floor drains closed	Vol	2	Fluids		41.0%	**54.3%**	66.9%	19	35	0,15
Hazardous Waste_Q01: Unknown Material	Compliance	2	Hazardous Waste		81.1%	**90.0%**	94.8%	45	50	0,0
Hazardous Waste_Q02: Hazardous Waste Quantity	Compliance	2	Hazardous Waste		94.9%	**100.0%**	100.0%	50	50	0,0
Mercury_Q02: Remove Switches	Compliance	1	Mercury		49.2%	**60.9%**	71.3%	28	46	4,0
Mercury_Q03: Stored Correctly	Compliance	2	Mercury		62.4%	**76.7%**	86.5%	23	30	20,0
Mercury_Q04: Container Condition	Compliance	2	Mercury		80.1%	**92.6%**	97.4%	25	27	22,1
Mercury_Q05: Labeled Universal Waste	Compliance	2	Mercury		54.9%	**70.4%**	82.1%	19	27	22,1
Mercury_Q06: On-sited more than 1 Year	Compliance	2	Mercury		70.0%	**84.6%**	92.7%	22	26	23,1
Mercury_Q07: Removal Records	Compliance	2	Mercury		24.2%	**36.7%**	51.3%	11	30	20,0
Mercury_Q08: Safety Devices	Compliance	2	Mercury		27.3%	**38.1%**	50.3%	16	42	6,2
Mercury_Q09: Employees Trained	Compliance	2	Mercury		28.7%	**39.5%**	51.6%	17	43	5,2
Oil_Q01: Container Condition	Compliance	1	Oil		94.4%	**100.0%**	100.0%	46	46	1,3
Oil_Q02: Containers Labeled	Compliance	2	Oil		44.9%	**56.5%**	67.4%	26	46	1,3
Oil_Q03a: Self Generated	Compliance	2	Oil		88.1%	**100.0%**	100.0%	20	20	30,0
Oil_Q04a: Non Registered Transport Methods	Compliance	2	Oil		31.7%	**54.5%**	75.6%	6	11	39,0
Oil_Q05a: SPCC Plan	Compliance	2	Oil		5.0%	**14.3%**	35.2%	2	14	36,0
Solid Waste_Q01: Open Dumping	Compliance	1	Solid Waste		69.7%	**80.0%**	87.3%	40	50	0,0
Solid Waste_QB01a: Eliminate Asbestos Exposure	Vol	2	Solid Waste		59.7%	**100.0%**	100.0%	4	4	45,1
Solid Waste_QB02a: Safely Remove	Vol	2	Solid Waste		59.3%	**80.0%**	91.5%	12	15	35,0
UST_Q01a: Not Registered	Compliance	2	UST		27.0%	**100.0%**	100.0%	1	1	49,0
Waste Tires_Q01a: Registration	Compliance	2	Waste Tires		N/A	**N/A**	N/A	0	0	N/A,N/A
Waste Tires_Q02: Open Dumping	Compliance	1	Waste Tires		67.5%	**78.0%**	85.6%	39	50	0,0
Waste Tires_Q03: Fire Hazard	Compliance	2	Waste Tires		94.4%	**100.0%**	100.0%	46	46	2,2

* These measures are explained in the States ERP Consortium's Guide to Reporting ERP Results.

Indiana DEM Auto Salvage ERP

Questions Analyzed: Performance Measures (All)

90% Confidence Level

Round 2 of Random Inspections

50 facilities eligible for this set of questions

				Summary Results						
Waste Tires_Q04: Water Accumulation	Compliance	2	Waste Tires	45.0%	**56.8%**	67.9%	25	44	4,2
Waste Tires_Q05: Vectors	Compliance	2	Waste Tires	66.2%	**78.0%**	86.4%	32	41	7,2
Waste Tires_Q06a: Delivery Location	Compliance	2	Waste Tires	86.3%	**100.0%**	100.0%	17	17	33,0
Waste Tires_Q06b: Manifests	Compliance	2	Waste Tires	N/A	**N/A**	N/A	0	0	N/A,N/A
Water_Q02: Construction Permit	Compliance	2	Water	N/A	**N/A**	N/A	0	0	N/A,N/A
Water_Q03: Soil Build Up	Compliance	2	Water	94.9%	**100.0%**	100.0%	50	50	0,0
Water_Q07: NOI submitted	Compliance	1	Water	16.0%	**24.0%**	34.7%	12	50	0,0
Water_Q07a: NOI accurate	Compliance	2	Water	11.4%	**18.4%**	28.7%	9	49	1,0
Water_Q08: SWP3 Checklist submitted	Compliance	2	Water	7.1%	**12.8%**	22.5%	6	47	1,2
Water_Q09: SWP3	Compliance	1	Water	8.4%	**14.6%**	24.5%	7	48	0,2
Water_Q10: Good Housekeeping	Compliance	2	Water	6.9%	**12.5%**	22.1%	6	48	0,2
Water_Q11: Quarterly Inspection	Compliance	2	Water	0.0%	**0.0%**	5.4%	0	47	0,3
Water_Q12: Annual employee training	Compliance	2	Water	2.8%	**6.4%**	14.7%	3	47	0,3
Water_Q13: Storm Water Samples Submitted	Compliance	1	Water	0.6%	**2.1%**	8.9%	1	47	0,3
Water_Q13a: Contamination	Compliance	2	Water	59.7%	**100.0%**	100.0%	4	4	40,6
Water_Q13b: Contamination eliminated	Compliance	2	Water	0.0%	**0.0%**	73.0%	0	1	49,0

* These measures are explained in the States ERP Consortium's Guide to Reporting ERP Results.

Indiana DEM Auto Salvage ERP

Questions Analyzed: Performance Measures (All)

90% Confidence Level

Performance Change (Round 2 minus Round 1)

# of facilities eligible for this set of questions: Round 1, 48; Round 2, 50

Measures Summarizing Performance across All Listed Questions

	Performance change (Percentage points)					Observed %	
	-50 0 +50	Significant?	Lower Bound	Observed	Upper Bound	Round 1	Round 2
Average Facility Score*		no	-10.4	**-4.6**	1.2	63.4%	58.8%
Median Facility Score		nc	nc	**-8.3**	nc	63.1%	54.8%
Aggregate Achievement Rate*		nc	nc	**-5.1**	nc	64.4%	59.3%
"Full Achievement" Rate (Achievement Rate across All Measures*)		no	0.0	**0.0**	0.0	0.0%	0.0%
Percent of Facilities Achieving At Least One Measure		no	0.0	**0.0**	0.0	100.0%	100.0%

Results Associated with Individual Questions

	Question Metadata (For Filtering)			Performance change (Percentage points)				Observed %	
Number & Nickname	Question?	Priority?	Issue/Medium	-50 0 +50	Significant?	Lower Bound	Observed	Upper Bound	Round 1	Round 2
Air_Q01: Open Burning	Compliance	1	Air		no	-4.4	**4.4**	13.2	89.6%	94.0%
Air_Q02: Solvents Used	Vol	2	Air		no	-17.1	**-3.0**	11.1	75.0%	72.0%
Air_Q02a: Degreaser Covers Closed	Compliance	2	Air		no	0.0	**0.0**	0.0	100.0%	100.0%
Air_Q02b: Solvent Containers Closed	Compliance	2	Air		no	-28.7	**-7.1**	14.6	91.7%	84.6%
Air_Q03: Dust Generated	Compliance	2	Air		no	0.0	**0.0**	0.0	100.0%	100.0%
Air_Q04: Sweat Furnace	Compliance	2	Air		no	0.0	**0.0**	0.0	100.0%	100.0%
Air_Q05: Refrigerant Removal Records	Compliance	2	Air		no	-7.9	**6.3**	20.6	22.2%	28.6%
Air_Q06: EPA Approved Device	Compliance	2	Air		no	-20.8	**-2.1**	16.5	63.9%	61.8%
Air_Q07: Refrigerants Discharged	Compliance	1	Air		no	-13.9	**-2.8**	8.3	91.2%	88.4%
Air_QB01: Refrigerants Removed Prior to Storage	Vol	2	Air		no	-21.6	**-5.5**	10.6	40.9%	35.4%
Air_QB02: Employees Trained	Vol	2	Air		no	-26.9	**-9.2**	8.6	64.7%	55.6%
Air_QB03: AC openings Sealed	Vol	2	Air		YES	-45.0	**-24.9**	-4.7	70.8%	45.9%
Air_QB04: Not overfilled	Vol	2	Air		YES	-36.7	**-20.3**	-3.9	91.3%	71.0%
Fluids_Q01: Spills	Compliance	1	Fluids		no	-9.6	**5.4**	20.4	64.6%	70.0%
Fluids_Q01a: Spills Reported	Compliance	2	Fluids		no	0.0	**0.0**	0.0	0.0%	0.0%
Fluids_QB02: Removed over containment	Vol	2	Fluids		no	-22.4	**-6.3**	9.8	65.9%	59.6%
Fluids_QB03: Batteries Removed	Vol	2	Fluids		no	-14.0	**-0.7**	12.5	78.7%	78.0%
Fluids_QB04: Stored inside	Vol	2	Fluids		no	-9.4	**3.3**	16.1	80.0%	83.3%
Fluids_QB05: Crusher in containment	Vol	2	Fluids		no	-32.7	**-13.8**	5.1	34.5%	20.7%
Fluids_QB06: Windshield wiper fluid removed	Vol	2	Fluids		no	-15.6	**-0.1**	15.4	34.8%	34.7%
Fluids_QB07: Containers inspected	Vol	2	Fluids		no	-3.2	**13.2**	29.6	46.8%	60.0%
Fluids_QB08: Lids closed	Vol	2	Fluids		no	-15.8	**-2.1**	11.5	78.7%	76.6%
Fluids_QB09: Containers Labeled	Vol	2	Fluids		no	-21.8	**-5.3**	11.1	55.3%	50.0%
Fluids_QB1: Removed before storing	Vol	2	Fluids		no	-21.2	**-5.1**	11.0	51.1%	46.0%
Fluids_QB10: Containers inside	Vol	2	Fluids		no	-5.5	**10.6**	26.8	51.1%	61.7%
Fluids_QB11: Empty drums storage	Vol	2	Fluids		no	-27.0	**-13.2**	0.6	86.4%	73.2%
Fluids_QB12: Parts stored inside	Vol	2	Fluids		no	-28.9	**-12.2**	4.4	62.2%	50.0%
Fluids_QB13: Floor drains closed	Vol	2	Fluids		YES	-49.6	**-32.8**	-16.1	87.1%	54.3%
Hazardous Waste_Q01: Unknown Material	Compliance	2	Hazardous Waste		no	-10.9	**-1.7**	7.6	91.7%	90.0%
Hazardous Waste_Q02: Hazardous Waste Quantity	Compliance	2	Hazardous Waste		no	0.0	**0.0**	0.0	100.0%	100.0%
Mercury_Q02: Remove Switches	Compliance	1	Mercury		no	-7.7	**8.7**	25.1	52.2%	60.9%
Mercury_Q03: Stored Correctly	Compliance	2	Mercury		no	-16.7	**1.7**	20.0	75.0%	76.7%
Mercury_Q04: Container Condition	Compliance	2	Mercury		no	-0.2	**15.7**	31.5	76.9%	92.6%
Mercury_Q05: Labeled Universal Waste	Compliance	2	Mercury		no	-23.6	**-3.7**	16.2	74.1%	70.4%
Mercury_Q06: On-sited more than 1 Year	Compliance	2	Mercury		no	-24.7	**-11.5**	1.6	96.2%	84.6%
Mercury_Q07: Removal Records	Compliance	2	Mercury		no	-21.2	**-0.4**	20.5	37.0%	36.7%
Mercury_Q08: Safety Devices	Compliance	2	Mercury		no	-38.5	**-19.0**	0.4	57.1%	38.1%
Mercury_Q09: Employees Trained	Compliance	2	Mercury		no	-24.5	**-5.3**	13.9	44.8%	39.5%
Oil_Q01: Container Condition	Compliance	1	Oil		YES	2.3	**9.5**	16.8	90.5%	100.0%
Oil_Q02: Containers Labeled	Compliance	2	Oil		no	-12.8	**4.1**	21.1	52.4%	56.5%
Oil_Q03a: Self Generated	Compliance	2	Oil		no	-1.6	**16.7**	34.9	83.3%	100.0%
Oil_Q04a: Non Registered Transport Methods	Compliance	2	Oil		YES	28.9	**54.5**	80.2	0.0%	54.5%
Oil_Q05a: SPCC Plan	Compliance	2	Oil		no	-1.5	**14.3**	30.0	0.0%	14.3%
Solid Waste_Q01: Open Dumping	Compliance	1	Solid Waste		no	-13.9	**-1.3**	11.4	81.3%	80.0%
Solid Waste_QB01a: Eliminate Asbestos Exposure	Vol	2	Solid Waste		no	0.0	**0.0**	0.0	100.0%	100.0%
Solid Waste_QB02a: Safely Remove	Vol	2	Solid Waste		no	-33.8	**-10.0**	13.8	90.0%	80.0%
UST_Q01a: Not Registered	Compliance	2	UST		N/A	N/A	**N/A**	N/A	N/A	100.0%
Waste Tires_Q01a: Registration	Compliance	2	Waste Tires		N/A	N/A	**N/A**	N/A	0.0%	N/A
Waste Tires_Q02: Open Dumping	Compliance	1	Waste Tires		no	-12.5	**0.9**	14.3	77.1%	78.0%
Waste Tires_Q03: Fire Hazard	Compliance	2	Waste Tires		no	-1.3	**2.3**	5.9	97.7%	100.0%

* These measures are explained in the States ERP Consortium's Guide to Reporting ERP Results.

Indiana DEM Auto Salvage ERP

Questions Analyzed: Performance Measures (All)

90% Confidence Level

Performance Change (Round 2 minus Round 1)

# of facilities eligible for this set of questions: Round 1, 48; Round 2, 50

				Performance change (Percentage points)					Observed %	
Waste Tires_Q04: Water Accumulation	Compliance	2	Waste Tires		no	-17.4	**-0.3**	16.7	57.1%	56.8%
Waste Tires_Q05: Vectors	Compliance	2	Waste Tires		no	-20.7	**-7.0**	6.8	85.0%	78.0%
Waste Tires_Q06a: Delivery Location	Compliance	2	Waste Tires		no	0.0	**0.0**	0.0	100.0%	100.0%
Waste Tires_Q06b: Manifests	Compliance	2	Waste Tires		N/A	N/A	**N/A**	N/A	83.3%	N/A
Water_Q02: Construction Permit	Compliance	2	Water		N/A	N/A	**N/A**	N/A	N/A	N/A
Water_Q03: Soil Build Up	Compliance	2	Water		no	0.0	**0.0**	0.0	100.0%	100.0%
Water_Q07: NOI submitted	Compliance	1	Water		no	-30.5	**-15.0**	0.5	39.0%	24.0%
Water_Q07a: NOI accurate	Compliance	2	Water		no	-30.4	**-15.0**	0.4	33.3%	18.4%
Water_Q08: SWP3 Checklist submitted	Compliance	2	Water		**YES**	-33.9	**-19.7**	-5.6	32.5%	12.8%
Water_Q09: SWP3	Compliance	1	Water		**YES**	-32.3	**-17.9**	-3.5	32.5%	14.6%
Water_Q10: Good Housekeeping	Compliance	2	Water		**YES**	-28.6	**-15.0**	-1.4	27.5%	12.5%
Water_Q11: Quarterly Inspection	Compliance	2	Water		**YES**	-30.9	**-20.5**	-10.1	20.5%	0.0%
Water_Q12: Annual employee training	Compliance	2	Water		**YES**	-25.2	**-13.6**	-2.0	20.0%	6.4%
Water_Q13: Storm Water Samples Submitted	Compliance	1	Water		**YES**	-34.4	**-22.9**	-11.4	25.0%	2.1%
Water_Q13a: Contamination	Compliance	2	Water		**YES**	6.4	**23.5**	40.7	76.5%	100.0%
Water_Q13b: Contamination eliminated	Compliance	2	Water		#DIV/0!	#DIV/0!	**0.0**	#DIV/0!	0.0%	0.0%

* These measures are explained in the States ERP Consortium's Guide to Reporting ERP Results.

Appendix H

Statistical Results: Compliance Measures Excluding Storm Water

Indiana DEM Auto Salvage ERP

Questions Analyzed: Performance Measures (All Compliance except Water)

90% Confidence Level

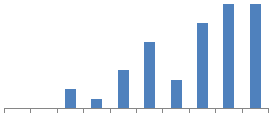
Round 1 of Random Inspections

48 facilities eligible for this set of questions

Measures Summarizing Performance across All Listed Questions

	Confidence Intervals (% with Preferred Response)			
	50%	Lower Bound	Observed	Upper Bound
Average Facility Score*		68.3%	**73.0%**	77.6%
Median Facility Score		nc	**77.4%**	nc
Aggregate Achievement Rate*		nc	**72.7%**	nc
"Full Achievement" Rate (Achievement Rate across All Measures*)		5.4%	**10.4%**	19.6%
Percent of Facilities Achieving At Least One Measure		94.7%	**100.0%**	100.0%

Facility Score Distribution



Results Associated with Individual Questions

	Question Metadata (For Filtering)			Confidence Intervals (% with Preferred Response)				Counts of Responses		
Number & Nickname	Compliance Question?	Priority?	Issue/Medium	50%	Lower Bound	Observed	Upper Bound	Preferred	Eligible (n)	N/A, Invalid
Air_Q01: Open Burning	Compliance	1	Air		80.4%	**89.6%**	94.6%	43	48	0,0
Air_Q02a: Degreaser Covers Closed	Compliance	2	Air		76.9%	**100.0%**	100.0%	9	9	36,3
Air_Q02b: Solvent Containers Closed	Compliance	2	Air		70.0%	**91.7%**	98.0%	11	12	36,0
Air_Q03: Dust Generated	Compliance	2	Air		94.7%	**100.0%**	100.0%	48	48	0,0
Air_Q05: Refrigerant Removal Records	Compliance	2	Air		14.2%	**22.2%**	33.4%	10	45	2,1
Air_Q06: EPA Approved Device	Compliance	2	Air		50.6%	**63.9%**	75.3%	23	36	4,8
Air_Q07: Refrigerants Discharged	Compliance	1	Air		80.1%	**91.2%**	96.2%	31	34	14,0
Fluids_Q01: Spills	Compliance	1	Fluids		53.2%	**64.6%**	74.4%	31	48	0,0
Fluids_Q01a: Spills Reported	Compliance	2	Fluids		0.0%	**0.0%**	14.5%	0	16	32,0
Hazardous Waste_Q01: Unknown Material	Compliance	2	Hazardous Waste		82.9%	**91.7%**	95.9%	44	48	0,0
Hazardous Waste_Q02: Hazardous Waste Quantity	Compliance	2	Hazardous Waste		94.3%	**100.0%**	100.0%	45	45	1,2
Mercury_Q02: Remove Switches	Compliance	1	Mercury		40.8%	**52.2%**	63.4%	24	46	0,2
Mercury_Q03: Stored Correctly	Compliance	2	Mercury		60.1%	**75.0%**	85.5%	21	28	5,15
Mercury_Q04: Container Condition	Compliance	2	Mercury		61.5%	**76.9%**	87.3%	20	26	8,14
Mercury_Q05: Labeled Universal Waste	Compliance	2	Mercury		58.8%	**74.1%**	85.0%	20	27	7,14
Mercury_Q06: On-sited more than 1 Year	Compliance	2	Mercury		84.6%	**96.2%**	99.0%	25	26	7,15
Mercury_Q07: Removal Records	Compliance	2	Mercury		23.9%	**37.0%**	52.5%	10	27	7,14
Mercury_Q08: Safety Devices	Compliance	2	Mercury		42.2%	**57.1%**	70.9%	16	28	6,14
Mercury_Q09: Employees Trained	Compliance	2	Mercury		31.1%	**44.8%**	59.4%	13	29	8,11
Oil_Q01: Container Condition	Compliance	1	Oil		80.7%	**90.5%**	95.4%	38	42	0,6
Oil_Q02: Containers Labeled	Compliance	2	Oil		40.4%	**52.4%**	64.1%	22	42	0,6
Oil_Q03a: Self Generated	Compliance	2	Oil		60.2%	**83.3%**	94.2%	10	12	36,0
Oil_Q04a: Non Registered Transport Methods	Compliance	2	Oil		0.0%	**0.0%**	47.4%	0	3	45,0
Oil_Q05a: SPCC Plan	Compliance	2	Oil		0.0%	**0.0%**	40.3%	0	4	44,0
Solid Waste_Q01: Open Dumping	Compliance	1	Solid Waste		70.8%	**81.3%**	88.4%	39	48	0,0
UST_Q01a: Not Registered	Compliance	2	UST		N/A	**N/A**	N/A	0	0	N/A,N/A
Waste Tires_Q01a: Registration	Compliance	2	Waste Tires		0.0%	**0.0%**	27.9%	0	7	41,0
Waste Tires_Q02: Open Dumping	Compliance	1	Waste Tires		66.2%	**77.1%**	85.0%	37	48	0,0
Waste Tires_Q03: Fire Hazard	Compliance	2	Waste Tires		90.5%	**97.7%**	99.4%	43	44	0,4
Waste Tires_Q04: Water Accumulation	Compliance	2	Waste Tires		45.0%	**57.1%**	68.4%	24	42	0,6
Waste Tires_Q05: Vectors	Compliance	2	Waste Tires		73.8%	**85.0%**	91.7%	34	40	3,5
Waste Tires_Q06a: Delivery Location	Compliance	2	Waste Tires		85.5%	**100.0%**	100.0%	16	16	32,0
Waste Tires_Q06b: Manifests	Compliance	2	Waste Tires		60.2%	**83.3%**	94.2%	10	12	34,2

*For info, see the States ERP Consortium's Guide to Reporting ERP Results.

Notes: (1) Confidence intervals calculated based on EPA Results Analyzer 2007.

(2) Stat. significance based on confidence interval excluding zero.

(3) Higher proportions/scores indicate better performance.

(4) "nc" means "not calculated."

Indiana DEM Auto Salvage ERP

Questions Analyzed: Performance Measures (All Compliance except Water)

90% Confidence Level

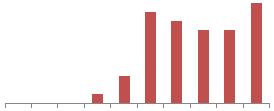
Round 2 of Random Inspections

50 facilities eligible for this set of questions

Measures Summarizing Performance across All Listed Questions

	Confidence Intervals (% with Preferred Response)			
	50%	Lower Bound	Observed	Upper Bound
Average Facility Score*		69.2%	**73.1%**	77.0%
Median Facility Score		nc	**72.5%**	nc
Aggregate Achievement Rate*		nc	**73.1%**	nc
"Full Achievement" Rate (Achievement Rate across All Measures*)		5.2%	**10.0%**	18.9%
Percent of Facilities Achieving At Least One Measure		94.9%	**100.0%**	100.0%

Facility Score Distribution



Results Associated with Individual Questions

	Question Metadata (For Filtering)			Confidence Intervals (% with Preferred Response)				Counts of Responses		
Number & Nickname	Compliance Question?	Priority?	Issue/Medium	50%	Lower Bound	Observed	Upper Bound	Preferred	Eligible (n)	N/A, Invalid
Air_Q01: Open Burning	Compliance	1	Air		86.1%	**94.0%**	97.4%	47	50	0,0
Air_Q02a: Degreaser Covers Closed	Compliance	2	Air		81.6%	**100.0%**	100.0%	12	12	37,1
Air_Q02b: Solvent Containers Closed	Compliance	2	Air		62.7%	**84.6%**	94.6%	11	13	36,1
Air_Q03: Dust Generated	Compliance	2	Air		94.9%	**100.0%**	100.0%	50	50	0,0
Air_Q05: Refrigerant Removal Records	Compliance	2	Air		19.7%	**28.6%**	39.6%	14	49	1,0
Air_Q06: EPA Approved Device	Compliance	2	Air		48.1%	**61.8%**	73.7%	21	34	13,3
Air_Q07: Refrigerants Discharged	Compliance	1	Air		78.3%	**88.4%**	93.9%	38	43	7,0
Fluids_Q01: Spills	Compliance	1	Fluids		59.0%	**70.0%**	78.9%	35	50	0,0
Fluids_Q01a: Spills Reported	Compliance	2	Fluids		0.0%	**0.0%**	16.2%	0	14	36,0
Hazardous Waste_Q01: Unknown Material	Compliance	2	Hazardous Waste		81.1%	**90.0%**	94.8%	45	50	0,0
Hazardous Waste_Q02: Hazardous Waste Quantity	Compliance	2	Hazardous Waste		94.9%	**100.0%**	100.0%	50	50	0,0
Mercury_Q02: Remove Switches	Compliance	1	Mercury		49.2%	**60.9%**	71.3%	28	46	4,0
Mercury_Q03: Stored Correctly	Compliance	2	Mercury		62.4%	**76.7%**	86.5%	23	30	20,0
Mercury_Q04: Container Condition	Compliance	2	Mercury		80.1%	**92.6%**	97.4%	25	27	22,1
Mercury_Q05: Labeled Universal Waste	Compliance	2	Mercury		54.9%	**70.4%**	82.1%	19	27	22,1
Mercury_Q06: On-sited more than 1 Year	Compliance	2	Mercury		70.0%	**84.6%**	92.7%	22	26	23,1
Mercury_Q07: Removal Records	Compliance	2	Mercury		24.2%	**36.7%**	51.3%	11	30	20,0
Mercury_Q08: Safety Devices	Compliance	2	Mercury		27.3%	**38.1%**	50.3%	16	42	6,2
Mercury_Q09: Employees Trained	Compliance	2	Mercury		28.7%	**39.5%**	51.6%	17	43	5,2
Oil_Q01: Container Condition	Compliance	1	Oil		94.4%	**100.0%**	100.0%	46	46	1,3
Oil_Q02: Containers Labeled	Compliance	2	Oil		44.9%	**56.5%**	67.4%	26	46	1,3
Oil_Q03a: Self Generated	Compliance	2	Oil		88.1%	**100.0%**	100.0%	20	20	30,0
Oil_Q04a: Non Registered Transport Methods	Compliance	2	Oil		31.7%	**54.5%**	75.6%	6	11	39,0
Oil_Q05a: SPCC Plan	Compliance	2	Oil		5.0%	**14.3%**	35.2%	2	14	36,0
Solid Waste_Q01: Open Dumping	Compliance	1	Solid Waste		69.7%	**80.0%**	87.3%	40	50	0,0
UST_Q01a: Not Registered	Compliance	2	UST		27.0%	**100.0%**	100.0%	1	1	49,0
Waste Tires_Q01a: Registration	Compliance	2	Waste Tires		N/A	**N/A**	N/A	0	0	N/A,N/A
Waste Tires_Q02: Open Dumping	Compliance	1	Waste Tires		67.5%	**78.0%**	85.6%	39	50	0,0
Waste Tires_Q03: Fire Hazard	Compliance	2	Waste Tires		94.4%	**100.0%**	100.0%	46	46	2,2
Waste Tires_Q04: Water Accumulation	Compliance	2	Waste Tires		45.0%	**56.8%**	67.9%	25	44	4,2
Waste Tires_Q05: Vectors	Compliance	2	Waste Tires		66.2%	**78.0%**	86.4%	32	41	7,2
Waste Tires_Q06a: Delivery Location	Compliance	2	Waste Tires		86.3%	**100.0%**	100.0%	17	17	33,0
Waste Tires_Q06b: Manifests	Compliance	2	Waste Tires		N/A	**N/A**	N/A	0	0	N/A,N/A

*For info, see the States ERP Consortium's Guide to Reporting ERP Results.

Notes: (1) Confidence intervals calculated based on EPA Results Analyzer 2007.

(2) Stat. significance based on confidence interval excluding zero.

(3) Higher proportions/scores indicate better performance.

(4) "nc" means "not calculated."

Indiana DEM Auto Salvage ERP

Questions Analyzed: Performance Measures (All Compliance except Water)

90% Confidence Level

Performance Change (Round 2 minus Round 1)

# of facilities eligible for this set of questions: Round 1, 48; Round 2, 50

Measures Summarizing Performance across All Listed Questions

	Confidence Interval for Performance Change (Percentage Points)					Observed %	
	-50 0 +50	Statistically Significant?	Lower Bound	Observed	Upper Bound	Round 1	Round 2
Average Facility Score*		no	-5.8	**0.2**	6.2	73.0%	73.1%
Median Facility Score		nc	nc	**-4.9**	nc	77.4%	72.5%
Aggregate Achievement Rate*		nc	nc	**0.4**	nc	**72.7%**	**73.1%**
"Full Achievement" Rate (Achievement Rate across All Measures*)		no	-10.1	**-0.4**	9.3	10.4%	10.0%
Percent of Facilities Achieving At Least One Measure		no	0.0	**0.0**	0.0	100.0%	100.0%

Results Associated with Individual Questions

	Question Metadata (For Filtering)			Confidence Interval for Performance Change (Percentage Points)				Observed %	
Number & Nickname	Compliance Question?	Priority?	Issue/Medium	-50 0 +50	Statistically Significant?	Lower Bound	Observed	Upper Bound	Round 1	Round 2
Air_Q01: Open Burning	Compliance	1	Air		no	-4.4	**4.4**	13.2	89.6%	94.0%
Air_Q02a: Degreaser Covers Closed	Compliance	2	Air		no	**0.0**	**0.0**	**0.0**	**100.0%**	**100.0%**
Air_Q02b: Solvent Containers Closed	Compliance	2	Air		no	-28.7	**-7.1**	14.6	91.7%	84.6%
Air_Q03: Dust Generated	Compliance	2	Air		no	0.0	**0.0**	0.0	100.0%	100.0%
Air_Q05: Refrigerant Removal Records	Compliance	2	Air		no	-7.9	**6.3**	20.6	22.2%	28.6%
Air_Q06: EPA Approved Device	Compliance	2	Air		no	-20.8	**-2.1**	16.5	63.9%	61.8%
Air_Q07: Refrigerants Discharged	Compliance	1	Air		no	-13.9	**-2.8**	8.3	91.2%	88.4%
Fluids_Q01: Spills	Compliance	1	Fluids		no	-9.6	**5.4**	20.4	64.6%	70.0%
Fluids_Q01a: Spills Reported	Compliance	2	Fluids		no	0.0	**0.0**	0.0	0.0%	0.0%
Hazardous Waste_Q01: Unknown Material	Compliance	2	Hazardous Waste		no	-10.9	**-1.7**	7.6	91.7%	90.0%
Hazardous Waste_Q02: Hazardous Waste Quantity	Compliance	2	Hazardous Waste		no	0.0	**0.0**	0.0	100.0%	100.0%
Mercury_Q02: Remove Switches	**Compliance**	**1**	**Mercury**		**no**	**-7.7**	**8.7**	**25.1**	**52.2%**	**60.9%**
Mercury_Q03: Stored Correctly	Compliance	2	Mercury		no	-16.7	**1.7**	20.0	75.0%	76.7%
Mercury_Q04: Container Condition	Compliance	2	Mercury		no	-0.2	**15.7**	31.5	76.9%	92.6%
Mercury_Q05: Labeled Universal Waste	Compliance	2	Mercury		no	-23.6	**-3.7**	16.2	74.1%	70.4%
Mercury_Q06: On-sited more than 1 Year	Compliance	2	Mercury		no	-24.7	**-11.5**	1.6	96.2%	84.6%
Mercury_Q07: Removal Records	Compliance	2	Mercury		no	-21.2	**-0.4**	20.5	37.0%	36.7%
Mercury_Q08: Safety Devices	Compliance	2	Mercury		no	-38.5	**-19.0**	0.4	57.1%	38.1%
Mercury_Q09: Employees Trained	Compliance	2	Mercury		no	-24.5	**-5.3**	13.9	44.8%	39.5%
Oil_Q01: Container Condition	Compliance	1	Oil		**YES**	2.3	**9.5**	16.8	90.5%	100.0%
Oil_Q02: Containers Labeled	Compliance	2	Oil		no	-12.8	**4.1**	21.1	52.4%	56.5%
Oil_Q03a: Self Generated	Compliance	2	Oil		no	-1.6	**16.7**	34.9	83.3%	100.0%
Oil_Q04a: Non Registered Transport Methods	Compliance	2	Oil		**YES**	28.9	**54.5**	80.2	0.0%	54.5%
Oil_Q05a: SPCC Plan	Compliance	2	Oil		no	-1.5	**14.3**	30.0	0.0%	14.3%
Solid Waste_Q01: Open Dumping	Compliance	1	Solid Waste		no	-13.9	**-1.3**	11.4	81.3%	80.0%
UST_Q01a: Not Registered	Compliance	2	UST		N/A	N/A	**N/A**	N/A	N/A	100.0%
Waste Tires_Q01a: Registration	Compliance	2	Waste Tires		N/A	N/A	**N/A**	N/A	0.0%	N/A
Waste Tires_Q02: Open Dumping	Compliance	1	Waste Tires		no	-12.5	**0.9**	14.3	77.1%	78.0%
Waste Tires_Q03: Fire Hazard	Compliance	2	Waste Tires		no	-1.3	**2.3**	5.9	97.7%	100.0%
Waste Tires_Q04: Water Accumulation	Compliance	2	Waste Tires		no	-17.4	**-0.3**	16.7	57.1%	56.8%
Waste Tires_Q05: Vectors	Compliance	2	Waste Tires		no	-20.7	**-7.0**	6.8	85.0%	78.0%
Waste Tires_Q06a: Delivery Location	**Compliance**	**2**	**Waste Tires**		**no**	**0.0**	**0.0**	**0.0**	**100.0%**	**100.0%**
Waste Tires_Q06b: Manifests	Compliance	2	Waste Tires		N/A	N/A	**N/A**	N/A	83.3%	N/A

*For info, see the States ERP Consortium's Guide to Reporting ERP Results.

Notes: (1) Confidence intervals calculated based on EPA Results Analyzer 2007.

(2) Stat. significance based on confidence interval excluding zero.

(3) Higher proportions/scores indicate better performance.

(4) "nc" means "not calculated."

Appendix I

Indiana Clean Yard Certificate

The Indiana Department of Environmental Management
hereby bestows the title of,

Indiana Clean Yard

Auto Salvage Recycler

in recognition of achievement in complying with all applicable environmental regulations and their commitment to integrating recycling into daily business to

Name of Business name/location

this day of Month XXth, 2009.

Expires two years after issue

IDEM EST. 1986

INDIANA CLEAN YARD
Auto Salvage Recyclers
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Thomas W. Easterly, Commissioner,
Indiana Department of Environmental Management

IDEM EST. 1986

Appendix J

Indiana Clean Yard Coverage in Local Media

Keeping things 'clean'

Adkins Auto Parts receives Indiana Clean Yard award

By Aleasha Sandley
asandley@reporter-times.com

MARTINSVILLE

Clean might be the last thing you think of when you picture a salvage yard, with beat-up cars and twisted scraps of metal lining the lot. But Adkins Auto Parts is beyond clean by Indiana Department of Environmental Management standards.

The business at 1010 N. Main St., Martinsville, was inducted into IDEM's Indiana Clean Yard environmental recognition program Wednesday and given the program's Gold designation for going above and beyond clean yard requirements and implementing best management practices in the yard.

The designation makes Adkins the sixth salvage yard in the state to be inducted into the program's gold level and the first yard in the program that does both auto salvaging and recycling of other metals.

"It's naturally a dirty business," co-owner Jim Adkins said of the auto- and metal-salvaging industry. "It's hard to make it a clean business and keep it a clean business."

Indiana Department of Environmental Management Commissioner Thomas Easterly (far left) presents Adkins Auto Parts co-owners Mark Kendall and Jim Adkins with an Indiana Clean Yard - Gold Level certificate as community members, including Martinsville Mayor Phil Deckard celebrate the achievement. Photo by Keith Rhoades.

> "We want to figure out a way to keep it (clean) and we're working on it and the folks who work here are committed to keeping it that way It's made our business more efficient, safer."
> Mark Kendall, co-owner of Adkins Auto Parts

Theresa Bordenkecher, the IDEM section chief for industrial waste, said Adkins Auto Parts received a 79 percent on an inspection checklist. To be eligible for the gold level, yards must achieve at least a 75 percent.

City officials, as well as members from the Morgan County Solid Waste Management District Board, attended the event Wednesday in which Adkins received its honor.

"I have never seen so many portions of the community show up for the announcement," Bordenkecher said.

IDEM Commissioner Thomas Easterly called Adkins' environmental protection measures "excellent."

"They're doing it more than properly," Easterly said. "When I see their tire management all inside a barn, that's excellent. Doing all these good environmental things helps their business get more efficient."

Adkins co-owner Mark Kendall said he asked environmental engineer Blake Wilson about five years ago to begin looking into the cost associated with creating an environmental plan. One of the final necessary steps to Adkins fulfilling the Indiana Clean Yard requirements was when it built a dam to contain runoff from the scrapping process, Kendall said.

"When we thought we were close, we asked (IDEM) to come see," he said. "I think it would have been a terrible disappointment if we didn't get it."

The business also purchased a machine that can drill holes in vehicles' gas tanks and radiators, seal them and suck the fluids out, as opposed to simply draining the fluids and leaving some of it behind. The co-owners also put in a system for making sure the yard regularly is cleaned, and employee Jay Steinway, who oversees the environmental compliance effort, checks the yard every week and writes notes to employees on how to maintain the environmental standards.

"We want to figure out a way to keep it (clean) and we're working on it and the folks who work here are committed to keeping it that way," Kendall said. "I don't think Jim or I was particularly anxious about causing trouble, and we wanted to follow the rules. It's made our business more efficient, safer."

Warren Waymire, of the county's solid waste management district, said Adkins Auto Parts was the largest recycler in Morgan County.

See CLEAN on page D2

Traderbakers owner reflects on business

Jeff Baker remembers Martinsville roots, company motivation

By Bryan Jackson
News correspondent

Traderbakers Flea Market owner Jeff Baker is on borrowed time, but he sees that as a good thing.

The difference between Baker and the rest of us is that he was lucky enough to have open heart surgery at age 39 and was forced to take inventory of his life and spend time in prayer.

"When you've have your life flash before your eyes, it makes you realize how short life is," he said.

His grandparents, Forest and Inez Baker, lived in the last house on Jordan Road in Martinsville and raised 10 children, including Baker's dad, Jack, so he has lots of family ties to Martinsville. Born in Noblesville, Baker grew up in the grocery/meat business, but always wanted to work for himself. While rehabilitating from heart surgery, he would stop at garage sales, Goodwill and the Salvation Army because his mother, Betty, loved to go bargain hunting, so he was bitten by the bargain bug too.

Toward the end of his rehab, he asked God to lead him into a way of life where he could make a decent living and bring his family into the business if they wanted. One day, as he was leaving a Goodwill store, he thought, "Why can't I make a living doing something that I really love to do more than anything else?"

Baker always has loved to buy and sell, and he just knew there had to be other people like him out there.

"I'll open a place where you can do both," he thought.

With the support of his wife, Patti, Baker gave his two weeks' notice and contacted a Realtor about leasing a vacant Walmart in Corydon. The lease offer was accepted, and the Bakers started working long and hard hours to get the store ready. Two weeks before the store was to open, Patti gave her notice at work and joined her husband in their new venture. Three months later, the building was completely full of vendors and they had 125 people on a waiting list for a spot.

Six months later, some of the vendors wanted to know if they were going to open another store.

"We had never thought about opening another one," Baker said. "We were pretty content working this one. It was successful and we were happy with what we had. Why have another headache?"

Traderbakers Flea Market owner Jeff Baker stands in front of o
fly from store to store. Submitted photo.

Business briefs

Chaplin to host seminar

Gary Chaplin, an Edward Jones financia
tinsville, will host a "Social Security an
nar, which will mix an educational inves
with a Social Security presentation. The
6 p.m. Oct. 21 at Holiday Inn Express, 2
Martinsville. Chaplin will be joined by A
the Social Security Administration and
Melissa Schiff CPA. Seating is limited. F
tion, call 765-342-1857.

Chamber holding Colts dra

The Greater Martinsville Chamber of Co
a drawing for three tickets to the Indian
Houston Texans Monday Night Football
p.m. Nov. 1 at Lucas Oil Stadium in India
package also includes a limo ride, gift b
for dinner at a restaurant of choice. To e
ing, purchase tickets for $10 each or $2
Chamber board members or at the Cha
E. Morgan St., Martinsville. Tickets also
at the Chamber's Fall Foliage Festival Bo
will be announced at the Oct. 15 Chamb
meeting.

Core Fitness to host walk/

Core Fitness, 480 S. Indiana St., Moores
the annual Sgt. Dan R. Starnes Memoria
Sept. 25 at Pioneer Park in Mooresville.
from 8:30 to 9:30 a.m., and the event b
Cost is $25 per person, which includes
all proceeds go toward the Sgt. Dan Sta
rial Scholarship Fund at the Community
Morgan County. Register at tinyurl.com
calling Core Fitness at 317-834-8226.

IU to host economist

Indiana University's chapter of Young A
Liberty will host free-market economis
Thomas E. Woods at 7 p.m. Tuesday in
er Auditorium, where he will present a
economic crisis from a free-market per
of Woods' lecture is "The Economic Cri
What Now?" The event is free and open
will be followed by a question-and-ans

Leadership academy class to graduate

The Morgan County Leadership Acaden
is Phyllis Hall, Sarah Richardson, Jamie
Dunigan, Shane Williams, Chris Page, Jo
lyn Holland, Linda Hilligoss, Angela Kath
Joy McCarthy Sessing. On Oct. 16, the c
from the academy. The 12 Morgan Cour
fessionals have spent 2010 learning abo
more information or to download a 201
the MCLA website at http://scican3.sci
call 317-374-3009.

Artesian Books to have gr

Artesian Books with Tinkerbell and Mir
gan St., Martinsville, will have a grand o
10:30 a.m. today. Non-fiction author an
County Deputy Sheriff Volitta Fritsche w
sign her book, and the Greater Martinsv
Commerce will have a ribbon-cutting c

Miller's to host Alzheimer

Miller's Senior Living, 225 W. Harrison S
will have an informational seminar from
27 hosted by the Rev. Jamie Wilson, pre
Alzheimer Advocacy Group, to teach th
tween dementia and Alzheimer's disea
will be provided by Premier Hospice an
RSVP to Tracy Davis at 317-834-6892.

Miller's Senior Living to ha pancake breakfast

Miller's Senior Living Community will h
munity pancake breakfast from 8 to 10
Miller's, 225 W. Harrison St., Mooresvil
Davis at 317-834-6892.

Business Ownership Initia

CLEAN

FROM PAGE 1

"As a conservation person, I'm just tickled at what they're doing," Waymire said. "This is a feather in Morgan County's cap."

Adkins Auto Parts employs 15 people and has been in Martinsville since 1987, Kendall said.

If they are not maintained properly, auto salvage yards can pose an environmental threat, according to an IDEM press release, as wrecked vehicles can contain antifreeze, gas, oil, brake fluid, transmission fluid, batteries, mercury switches and tires.

To pursue Indiana Clean Yard recognition, yards contact IDEM for an environmental self-evaluation checklist. After correcting any problems found on the checklist, the property becomes eligible for the program. If additional requirements are met, the yard can receive IDEM's gold level.

"Achieving the highest certification level signifies that the auto salvage facility has gone beyond environmental regulations to show that they care about the community and are committed to protecting the environment," the press release says.

An Adkins Auto Parts worker loads aluminum cans onto a machine at the salvage yard. Adkins was the first yard in Indiana that recycles vehicle parts and other metals to receive the Indiana Department of Environmental Management's Clean Yard - Gold Level award. Photo by Aleasha Sandley.