

Happy Import Auto Salvage
Industrial User Inspection Report
May 19, 2021

U.S. Environmental Protection Agency Region 5

Purpose: Industrial Stormwater Inspection

Facility: Happy Import Auto Salvage, INRM00795
305 South Tibbs Avenue
Indianapolis, Indiana 46261 (317) 484-9780

Inspection Date: May 19, 2021

EPA Representatives:

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Facility Representatives:

Christopher Browder, Vice President, (317) 484-9780, happyauto@sbcglobal.net
Ryan Shaul, Counterman, (317) 484-9780, happyauto@sbcglobal.net

Report Prepared by:

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Water Enforcement and Compliance Assurance Branch, Section 2

Bajor, John

Inspector Signature: _____

Digitally signed by John
Date: 2021.07.15
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Approver: Ryan Bahr, Section 2 Chief, Water Enforcement and Compliance Assurance Branch

RYAN BAHR

Approver Signature and Date: _____

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PURPOSE OF INSPECTION/ AGENCY PARTICIPANTS

The purpose of the inspection at Happy Import Auto Salvage (HIAS), located at 305 South Tibbs Avenue in Indianapolis, Indiana was to describe, evaluate, and document compliance with the Clean Water Act (CWA) and general industrial stormwater permit IRM00795 as issued by IDEM. This was an announced inspection.

EPA inspection team participants included Jack Bajor as lead inspector and Val Dooling, environmental engineer. Indiana Department of Environmental Management (IDEM) Office of Water Quality Stormwater Specialist Robert (Rob) Beck participated in the inspection.

The team was prepared to take samples at HIAS but experienced dry weather and were unable to gather samples at the time of inspection.

BACKGROUND

HIAS is an auto parts and salvage facility [Standard Industrial Classification (SIC) Code 5515] that engages in dismantling motor vehicles for the purpose of selling parts. The facility operates on approximately 5.5 acres of property and has been in operation since 1995. HIAS has 6 employees and operates Monday through Friday from 8:00AM to 5:00PM and 8:00AM to 4:00PM on Saturdays. Two buildings are located on site including the office and shop/ storage building. Approximately 90% of the 5.5 acres of active property is overlaid with impervious but somewhat deteriorating concrete with the remaining areas covered with gravel.

HIAS discharges overland flow and through a designated Outfall 001 to Eagle Creek under general stormwater permit number INRM00795 as issued from IDEM. The coverage for HIAS expired on August 15, 2015. HIAS had not filed a Notice of Intent (NOI) with IDEM as required for renewal of its permit at time of the inspection. The last NOI (Attachment I) from HIAS was filed with IDEM on April 20, 2010.

ON-SITE INSPECTION

EPA and IDEM inspectors drove to the HIAS location in separate vehicles and met at 8:49AM in the HIAS parking lot to collectively enter the HIAS facility garage office at 9:00AM to meet with Christopher Browder, the Vice President of HIAS. This inspection was announced and Mr. Browder anticipated the inspection team's arrival and the purpose of inspection. Upon entering the office, introductions and EPA credentials were presented to Mr. Browder and I thanked him for his time to accompany us for the morning inspection.

I advised Mr. Browder that the industrial storm water inspection would include an opening conference, an on-site physical inspection of the facility and a final closing conference, I advised him that a summary report of our findings would be provided to HIAS upon final management approval.

Mr. Browder stated that no masks had to be worn during the inspection, but all participants maintained a 6-foot distance from persons throughout the inspection. Upon finishing introductions, presenting credentials and discussing COVID precautions, the inspectors took seats in the garage office to begin the opening conference.

HIAS Opening Conference

For the opening conference, I explained that EPA and IDEM were present to conduct an industrial stormwater inspection of the HIAS facility to describe, evaluate, and document compliance with the Clean Water Act (CWA) and general industrial stormwater permit IRM00795 as issued by IDEM. I stated that the inspection would include the opening conference to discuss HIAS's operations, to conduct a facility operations tour and inspection which will result in the preparation of a final inspection report to be provided to HIAS following management approval of today's findings, and to conduct a closing conference. Rob Beck explained the inspection from IDEM's perspective.

I stated at this time the opening conference will entail an interview to secure detailed information on the salvage yard operations at the HIAS facility, a succinct discussion regarding industrial stormwater permit activities and a records review of stormwater files related to HIAS operations as an industrial discharging stormwater to Eagle Creek.

I asked if there were any confidential business information (CBI) restrictions or concerns. Mr. Browder responded there were no CBI concerns.

Following CBI discussion, I stated that the inspection team would take photographs during the course of the inspection and Mr. Browder stated it was acceptable to take photographs. HIAS opted not to take photographs with those as taken by EPA.

The inspectors brought safety shoes, hard hats, vests, safety glasses and other protective equipment to use during the inspection but were told by Mr. Browder that it was not necessary. Inspectors did wear safety shoes during the inspection.

After setting the foundation for the inspection, the inspection team began to ask questions regarding HIAS' operations.

Specific industrial categorical questions for HIAS and responses were as follows:

- Rob Beck of IDEM asked for a copy of HIAS' SWPPP. *Mr. Browder stated that he didn't know if they had a current copy available. He stated that he has not heard from the consultant who authored the original SWPPP and collected samples for several years then stopped. (Before the interview was completed, a copy of their original SWPPP under Storm water NPDES Permit INR600131 and miscellaneous files were located and available for review).*

- Mr. Browder was asked operation questions regarding the fluids taken and stored on site from the vehicles that were taken in at HIAS. *Mr. Browder responded that they remove motor oil, anti-freeze and freon from the vehicles and these fluids are all stored in containers under roof. The storage vessels include a 300-gallon diesel fuel above ground storage tank, a 300-gallon used oil tank. Both storage tanks are inside concrete secondary containment structures. A 55-gallon drum on site contains used antifreeze. Fuel, oil and anti-freeze commodities are recycled and reused. Freon is captured and properly disposed.*
- Mr. Browder was asked if any stormwater sewers or inlets exist on the property and if they connect to Outfall 001. *Mr. Browder said he was unaware of any storm sewers or inlet structures on the property and feels none exist. He did not know for certain where designated Outfall 001 is located or if it exists as a pipe structure and felt that stormwater basically sheet flows to Eagle Creek in several locations. He stated that it has been “a while” since the consultant had sampled stormwater discharge.*
- Mr. Browder was asked to describe HIAS operations. *He responded that HIAS has owned the property since the 1960’s and the current operation has been on site since 1995. The property is 5.5 acres and 90% of the property is covered by impervious concrete. Remaining areas are covered with gravel. HIAS purchases 4-5 cars per week and has an inventory of approximately 1,000 cars with 400 to 500 cars per year sent out for crushing/ scrapping operation by an outside source. The fluids including gas, oil and anti-freeze are drained and stored on site as the vehicles come on site. Engines, batteries (up to 20 batteries before being sold to Interstate), and catalytic converters are removed from the vehicles and properly stored on site until sold. Car parts remaining on cars held in inventory are sold. A freon recovery machine stored indoors is kept on site to remove refrigerant until properly disposed or recycled. Wrecks and car bodies of no use are stacked and hauled to a wrecker by a contractor.*
- Mr. Browder was asked about storm water management on site. *He responded that storm water normally remains on-site until it will evaporate during minor storm events. For larger storms the sheet flow migrates toward Eagle Creek at several outlet sites. He said there is no flooding within the buildings or work areas under roof and that roof gutter flow drains to the front of the building and “puddles”.*

At this point in the opening conference, Mr. Shaul located and brought out the original SWPPP in a box with other stormwater files for the team to review. The team looked at the original SWPPP and took pictures of key pages including the facility layout showing the buildings, sheet flow runoff routes and possible location of a unique Outfall 001. Pictures were taken of additional key pages of the original SWPPP including the HIAS facility overview, potential pollutant sources, permit monitoring and reporting requirements and employee training requirements. (Photos #1 through #12).

HIAS Facility Inspection

The facility inspection began at 9:40AM with EPA and IDEM inspectors being accompanied by Mr. Browder. We walked to the north end of the property to start inspecting the salvage yard and the embankment of Eagle Creek bordering the property to the east.

A primary focus of the inspection team was to locate Outfall 001 as described in the NOI and SWPPP BMP layout. The inspection team investigated the heavily vegetated and very steep embankment for a discrete pipe thought to be Outfall 001. Several low areas on the East embankment of Eagle Creek appeared to contain broken pipes. Upon investigation, some of these locations were comprised of old vehicle wheel cowlings and automotive parts integrated into the embankment soil matrix. Mr. Browder did not think that a unique discharge pipe designated as Outfall 001 existed to Eagle Creek (Photo #13) as there are no storm sewers or storm inlets within the salvage area.

Working our inspection activities south along the Eagle Creek embankment located east of the salvage yard, the team discovered numerous areas of potential storm water runoff location to Eagle Creek from the salvage yard (Photo #14). These areas contained accumulated vegetation and debris on the low side of the concrete sloped toward Eagle Creek at the embankment.

Continuing south and west of Eagle Creek, we noted the salvage yard vehicle inventory consisting of vehicles whose engines and transmissions were removed. Mr. Browder explained that these commodities were removed in the shop. These commodities were stored on site under roof for sale after being drained of fuel and oil. The drained fuel and oil was stored in 300-gallon tanks on site. The batteries, catalytic converters and antifreeze were removed and stored on site for sale or disposal (Photo #15).

The inspection team continued along Eagle Creek and located a low area with a hole (Photo #16). Upon close inspection, the hole appeared to be a void in the embankment due to soil erosion through rip rap and car parts.

Many vehicles were stored along the embankment. A typical view of the concrete base of the salvage yard is illustrated in Photo #17.

As the inspection team continued south along the embankment, another potential stormwater runoff path and pipe aperture to Eagle Creek was discovered (Photo #18).

The inspection team then proceeded south and found a vehicle with fluids in the containers. One container had a pink fluid and appeared to be window wash container; the other had a clear liquid and appeared to be a radiator overflow reservoir (Photo #19).

We proceeded to continue to walk south through the salvage yard and then toward the embankment and discovered another runoff path toward Eagle Creek with an aperture to Eagle

Creek (Photo #20). It was unable to be determined if this aperture contained a pipe or rip rap debris as the end was obstructed with rip rap materials.

As we continued south along the embankment, the team located another stormwater runoff path to Eagle Creek (Photo #21).

Toward the extreme south of the property along the embankment to Eagle Creek, the inspection team located an area of washout/erosion where there was a path through the vegetation from a hole in the side of the embankment to Eagle Creek. (Photo #22). The five areas photographed are in the general locations illustrated on Photo #1, where the SWPP BMP site layout map illustrates the flow routes with red arrows. No discrete Outfall 001 as a pipe discharge was confirmed during the site inspection.

After inspecting the vehicle storage area and the embankment located west of Eagle Creek, the inspection team observed covered storage of transmission and engines that were drained of fluids (Photo #23). The team then inspected the shop area and found the 300-gallon diesel fuel storage tank which had a concrete secondary containment structure located below. This tank was adjacent to a white 55-gallon drum that served as a secondary containment structure for collected antifreeze. The secondary containment structure appeared to be inadequate for the 300-gallon diesel fuel tank and was found to have a drain plug attachment that was not secured to the concrete structure (Photo #24 & #25).

The team inspected the 300-gallon engine oil storage tank with secondary containment as a concrete structure. The structure exhibits evidence of an overflow or spill train from filling the tank with used oil from the salvage vehicles (Photo #26).

As we proceed to enter the office for the closing conference, the inspection team walked through the shop area where engines, transmissions and other auto parts are removed from stored vehicles (Photo #27). The shop area was clean. We noticed the use of oil dry compounds as they were applied to the floor and outside working areas of the shop.

As we walked through the shop area to the office, we noticed the freon recovery unit (Photo #28) used to remove freon from the air conditioners of the vehicles as needed.

At this point the inspection team completed the site inspection and proceeded to the office for the closing conference.

HIAS Closing Conference

The closing conference was conducted as we finished our facility tour. The inspection team including Val Dooling, Rob Beck of IDEM and I returned to the HIAS office with Mr. Browder at 10:36AM for a closing conference. Ryan Shaul of HIAS was additionally present for the closing conference.

After I thanked Mr. Browder for his participation and courtesy rendered throughout the inspection, I briefly reviewed and discussed the documents we reviewed and commented on our site observations. I focused on the absence of an updated SWPPP, missing information crucial to the SWPPP and that no records were available on sampling. I mentioned the concern of the need for representative sampling at designated discharge point(s) and the question of the absence of a known location for Outfall 001. I advised Mr. Browder that our inspection and findings will be described in an inspection report and would be sent to their attention following our management's review and approval of the report and its findings.

Mr. Beck of IDEM provided closing remarks from the state's perspective including the importance of filing a new NOI application with IDEM immediately and to re-engage with their consultant to ensure SWPPP requirements are satisfied, sampling is resumed, and that annual reports are filed with IDEM.

I asked if Mr. Browder had any questions and, hearing none, I then ended the closing conference and the inspection team departed the facility at 10:50AM. The inspection team then met at a location to briefly discuss the inspection and areas of concern before departing to return home.

AREAS OF CONCERN

EPA has the following areas of concern following the review of information gathered during the inspection:

- The industrial general stormwater permit coverage (INRM00795) for HIAS expired August 15, 2015. A Notice of Intent (NOI) for renewal was not filed with IDEM before its expiration date.
- The Spill Response Plan (SRP) in the SWPPP was lacking current information regarding procedures to respond to sources of potential spills taking into account HIAS' current operations. There were also no records that employees had received annual training to properly respond to spills.
- Records were not updated/maintained in the SWPPP or in HIAS' files as required. The inspection team found no current records since 2009 available at time of inspection. The records that are required to be retained on-site include regular site maintenance activities, employee training, sampling results, quarterly inspections, all annual reports, discharge monitoring reports and laboratory results.
- HIAS could not confirm the location of Outfall 001 to Eagle Creek which is designated in the SWPPP as existing on the east side of the property. This Outfall is to be used for collecting representative samples per the SWPPP.
- At several areas along the embankment, EPA observed concrete sloped toward Eagle Creek indicating that stormwater flow from the facility could flow by gravity to Eagle

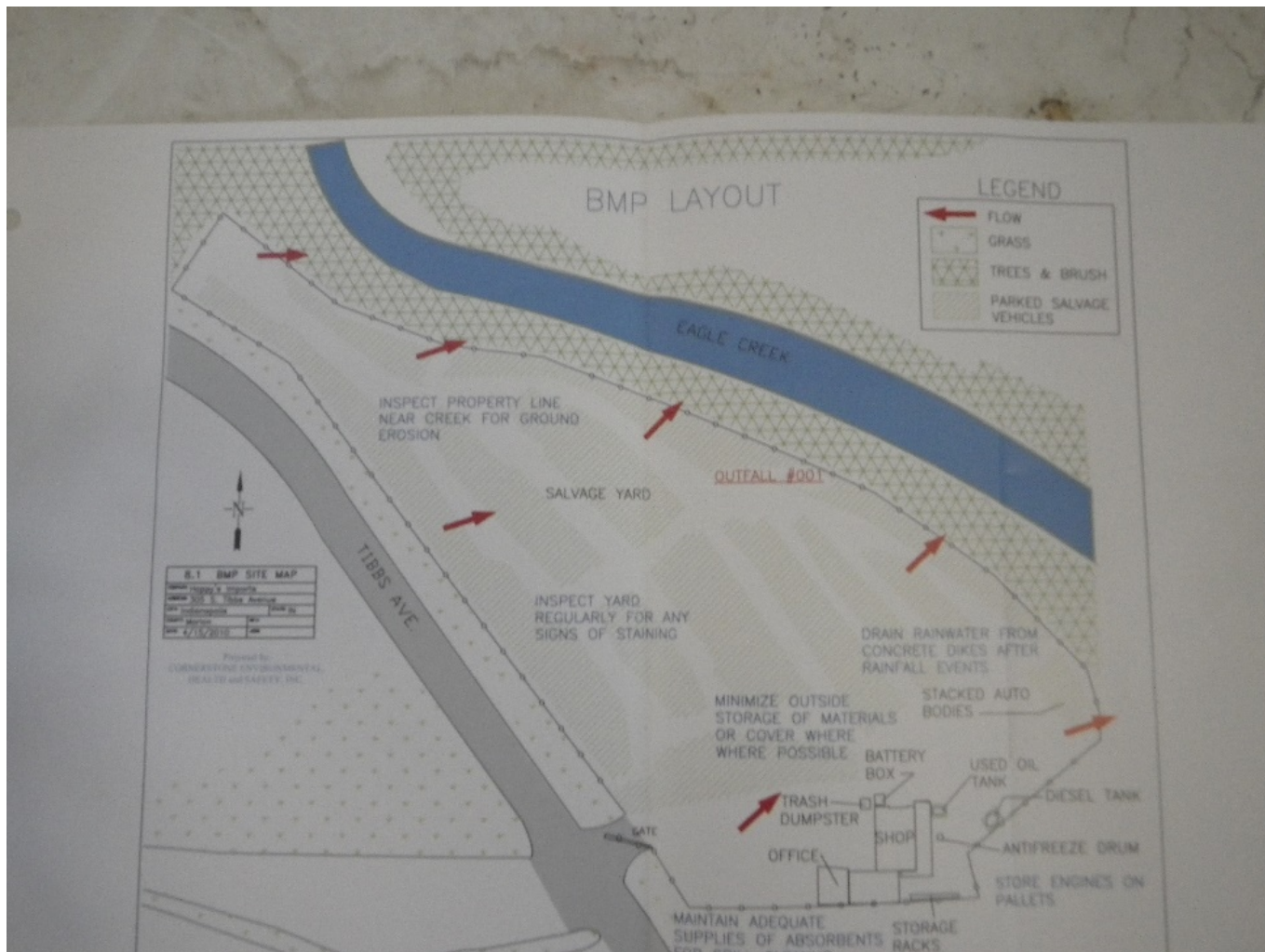
Creek. Holes observed in the embankment indicated that the embankment may not be sufficiently stabilized to prevent point source discharges.

- The drain plug on the secondary containment structure for the 300-gallon diesel tank was not secure. The secondary containment structure appeared to not provide adequate volume to contain 300-gallons from the diesel fuel tank.
- The 300-gallon used engine oil storage tank showed signs of overflow or leakage to the secondary containment vessel which also exhibited oil overflow or spillage.

LIST OF ATTACHMENTS

- I. HIAS NOI dated April 20, 2010.**
- II. HIAS Industrial Storm Water Permits – Monitoring Benchmarks.**
- III. Sector M - EPA Fact Sheet/ Auto Salvage.**

Happys Import Salvage
EPA Inspection May 19, 2021
All photos taken by Val Dooling, Environmental Engineer/Scientist, U.S. EPA
Camera: Pentax WG-1 GPS #1



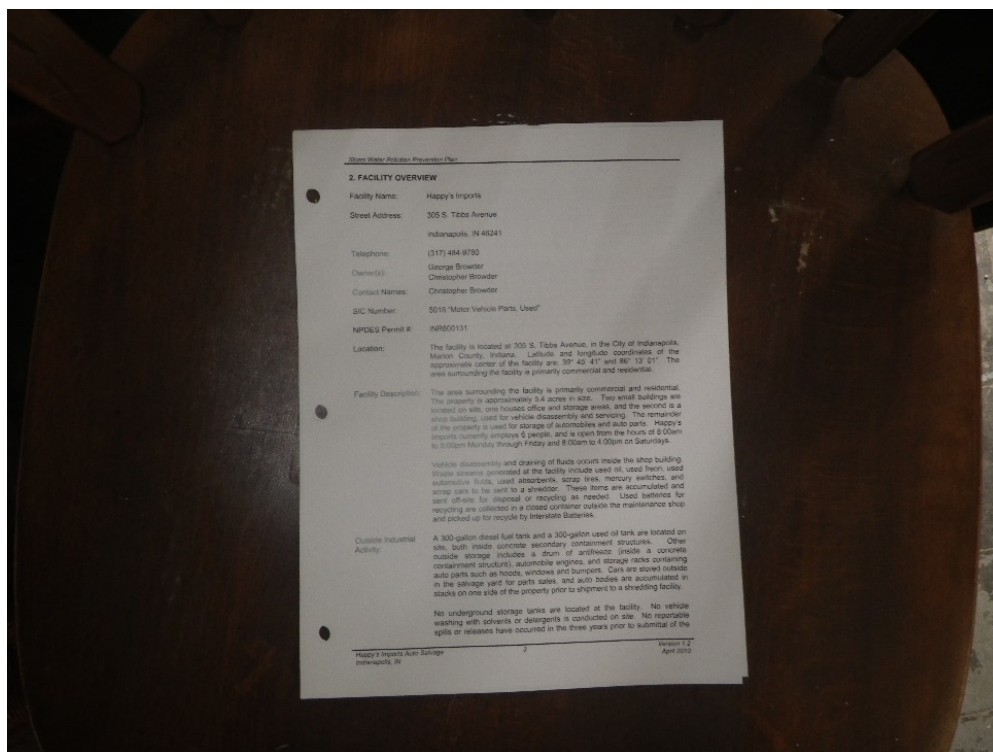
IMGP0001

Description: SWPPP- BMP site layout and flow routes.

Location: SWPPP.

Camera Direction: Down.

Date/Time: May 19, 2021/ 09:16AM



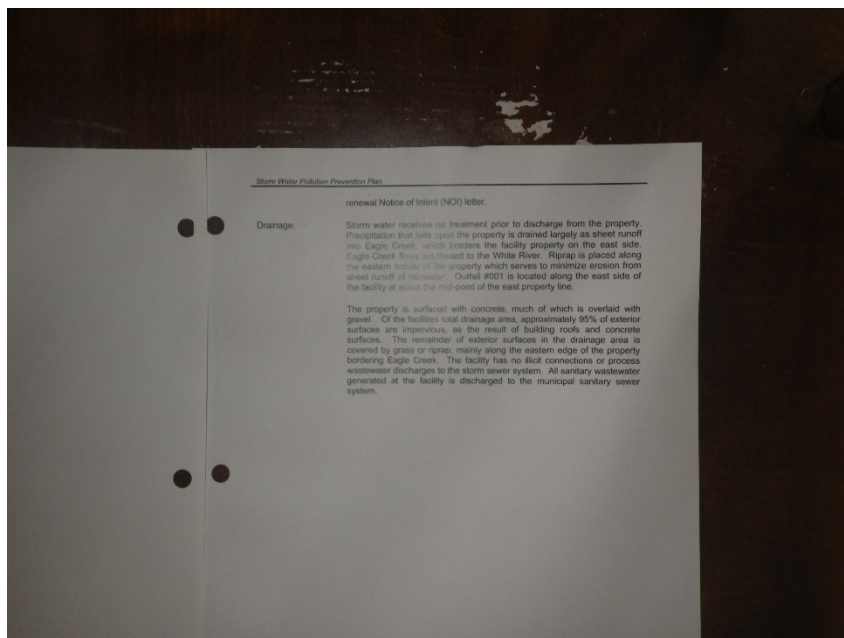
IMGP0002

Description: Facility overview.

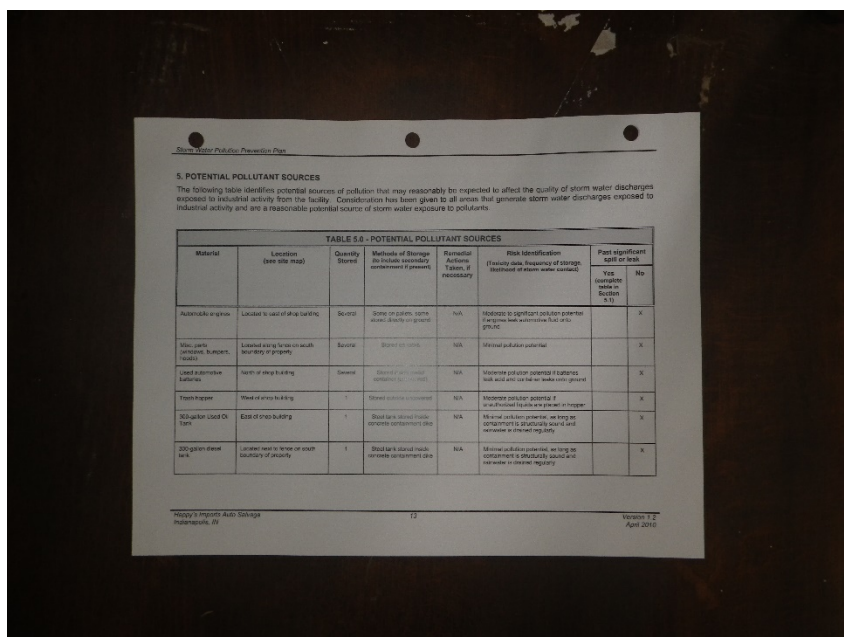
Location: SWPPP.

Camera Direction: Down.

Date/Time: May 19, 2021/ 09:19AM



IMGP0003
 Description: Facility overview.
 Location: SWPPP.
 Camera Direction: Down.
 Date/Time: May 19, 2021/ 09:20AM



IMGP0004
 Description: Potential pollutant sources.
 Location: SWPPP.
 Camera Direction: Down.

Date/Time: May 19, 2021/ 09:20AM

Storm Water Pollution Prevention Plan

TABLE 5.0 - POTENTIAL POLLUTANT SOURCES							
Material	Location (see site map)	Quantity Stored	Methods of Storage (to include secondary containment if present)	Preventative Actions Taken, if necessary	Risk Identification (Hazardity data, frequency of storage, likelihood of storm water contact)	Past significant spill or leak	
						Yes (complete table in Section 5.1)	No
Antifreeze drum	East of shop building	1	Drum stored on concrete pad over secondary containment dike	N/A	Minor pollution potential, as long as drum is inspected daily and secondary containment is maintained regularly from outside dike		X
Automobiles for salvage	Located throughout property, north of office and shop building	Several	Automobile stored outside for parts if being as needed	N/A	Minor pollution potential if batteries and fluids are properly removed from auto prior to storage		X
Auto bodies	Stored on east side of property prior to transport office for shredding	Several	Auto bodies are washed outside	N/A	Minor pollution potential as auto bodies are larger contain fluids, batteries or machines		X

Happy's Imports Auto Salvage
Indianapolis, IN

14

Version 1.2
April 2010

IMGP0005

Description: Potential pollutant sources.

Location: SWPPP.

Camera Direction: Down.

Date/Time: May 19, 2021/ 09:20AM

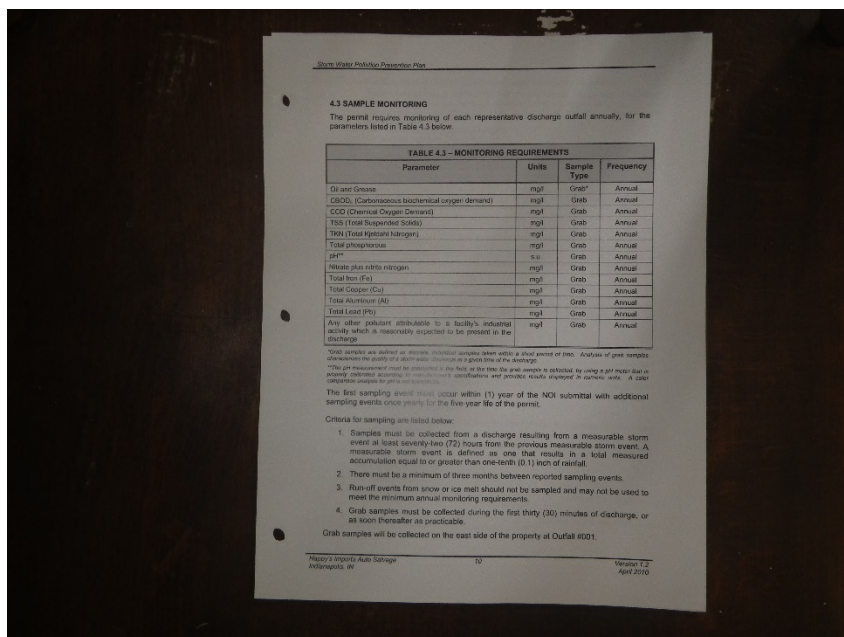
Storm Water Pollution Prevention Plan

4. PERMIT REQUIREMENTS Happy's Imports must take specific steps to obtain coverage under the General Permit, and maintain compliance with the Permit. These requirements are listed below. 4.1 NOI SUBMITTAL General Permit coverage is valid for five years from the date of NOI submission. As such, Happy's Imports coverage under the original General Permit will expire on August 17, 2010. A renewal Notice of Intent was submitted to IDEM in April 2010. 4.2 SWPPP PREPARATION AND IMPLEMENTATION This SWPPP for Happy's Imports was developed in June 2008 and updated in April 2010. As a requirement of the Permit, the SWPPP is to be implemented no later than 365 days from the submittal of the NOI letter. 4.2.1 SWPPP Certification Checklist The permittee must submit a checklist to IDEM within thirty (30) days of the SWPPP implementation date, but no later than one (1) year after the original NOI is received by IDEM, certifying that the Storm Water Pollution Prevention Plan has been prepared and contains all the required elements set forth in 327 IAC 15-6-7. The checklist must be signed by a facility representative and by a Qualified Professional. A copy of the checklist is located in Appendix C of this SWPPP. 4.2.2 SWPPP Amendments This SWPPP must be amended in the following circumstances: - Whenever there is a change in design, construction, operation, or maintenance at the facility, which may have a significant effect on the potential for the discharge of pollutants to surface waters of the state. - Upon written notice from IDEM, that the SWPPP proves to be ineffective in controlling pollutants in storm water discharges exposed to industrial activity. Within sixty (60) days of such notification from the commissioner the permittee shall make the required changes to the SWPPP and shall submit the amended SWPPP to the commissioner for review.

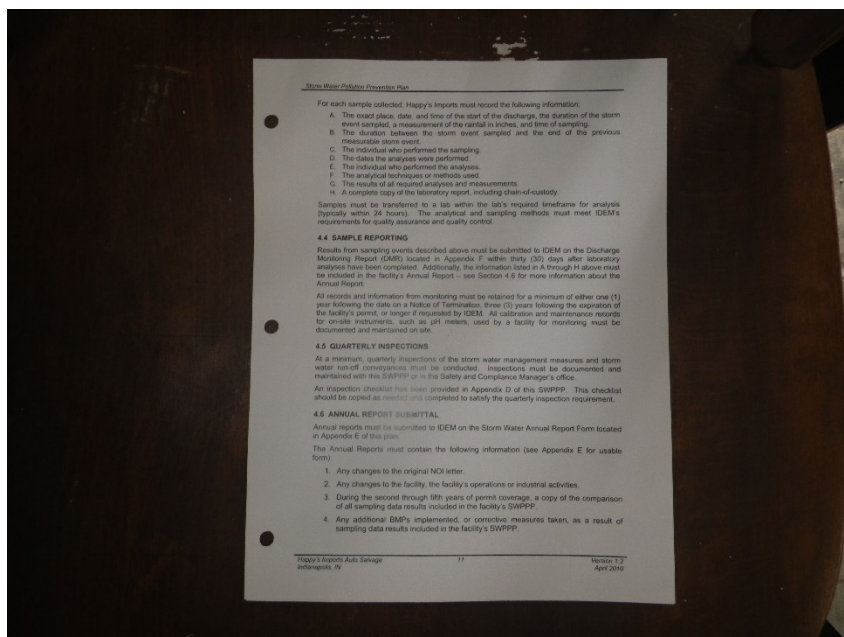
IMGP0006

Description: NPDES permit requirements.

Location: SWPPP.
Camera Direction: Down.
Date/Time: May 19, 2021/ 09:24AM



IMGP0007
Description: NPDES permit monitoring requirements.
Location: SWPPP.
Camera Direction: Down.
Date/Time: May 19, 2021/ 09:24AM



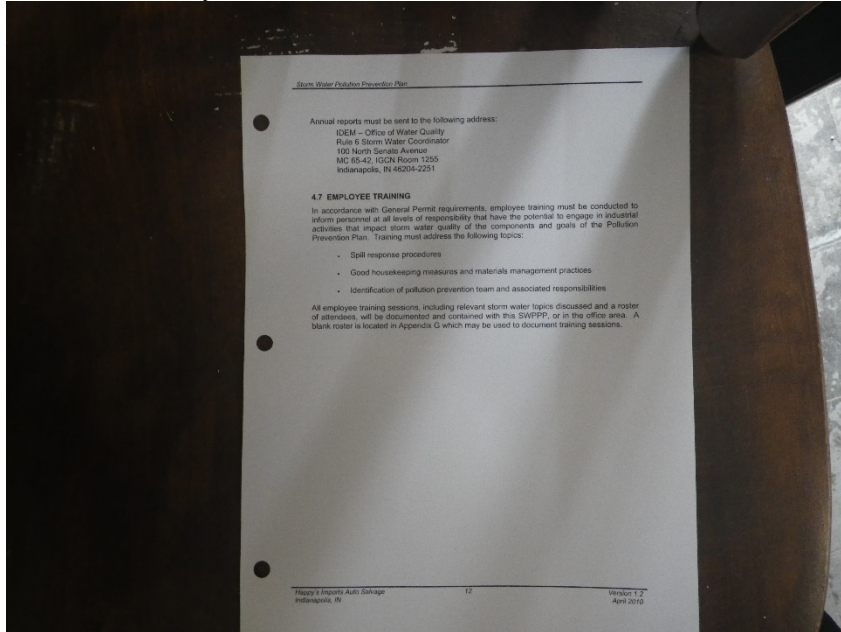
IMGP0008

Description: NPDES reporting requirements.

Location: Down.

Camera Direction: SWPPP.

Date/Time: May 19, 2021/ 09:24AM



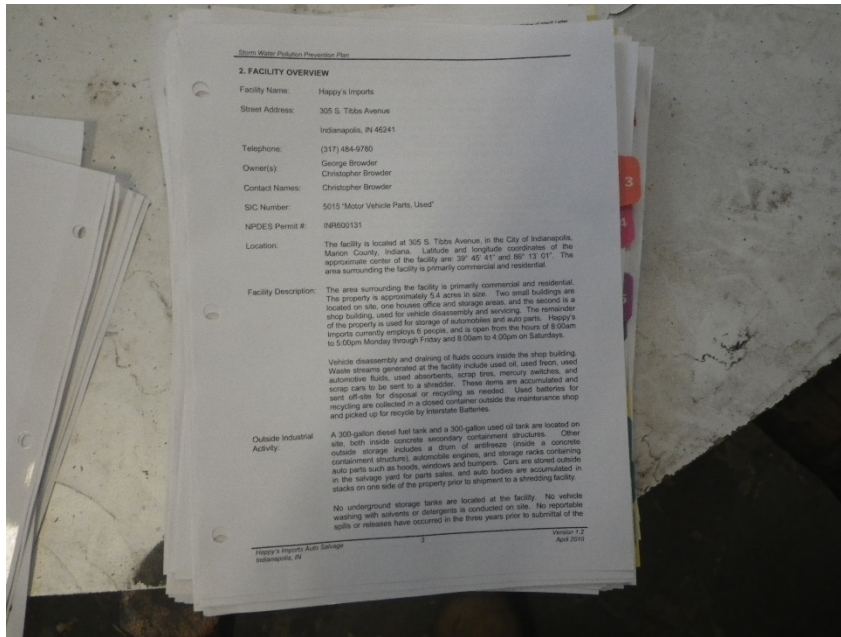
IMGP0009/010 (duplicate)

Description: NPDES permit training requirements.

Location: SWPPP.

Camera Direction: Down.

Date/Time: May 19, 2021/ 09:24AM



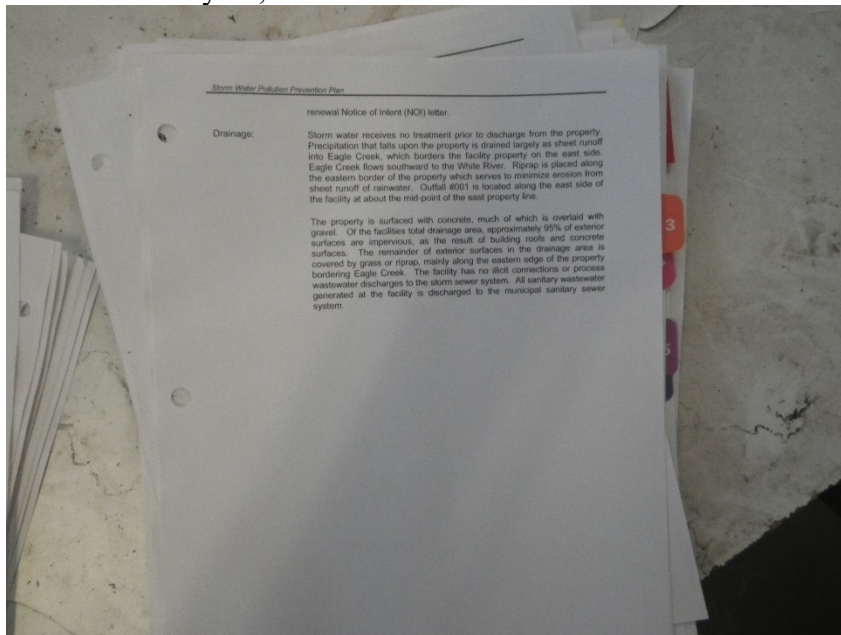
IMGP0011

Description: Duplicate of Photo 0002 for clarity.

Location: SWPPP.

Camera Direction: Down.

Date/Time: May 19, 2021/ 09:27AM



IMGP0012

Description: Duplicate of Photo 0003 for clarity.

Location: SWPPP.

Camera Direction: Down.

Date/Time: May 19, 2021/ 09:27AM



IMGP0013

Description: Eagle Creek looking down heavily vegetated steep embankment.

Location: Eagle Creek.

Camera Direction: NNE

Date/Time: May 19, 2021/ 09:42AM



IMGP0014

Description: The concrete in this area was sloped toward Eagle Creek.

Location: East enbankment.
Camera Direction: NNE
Date/Time: May 19, 2021/ 09:48AM



IMGP0015
Description: Salvage yard.
Location: West of Eagle Creek.
Camera Direction: SE
Date/Time: May 19, 2021/ 09:49AM



IMGP0016

Description: This area was lower, wet, and had a hole as pictured.

Location: East embankment to Eagle Creek.

Camera Direction: NE

Date/Time: May 19, 2021/ 09:53AM



IMGP0017

Description: Vehicles stored along embankment to Eagle Creek.

Location: West of Eagle Creek.

Camera Direction: NE

Date/Time: May 19, 2021/ 09:51AM



IMGP0018

Description: At this location, we observed this hole in the ground.

Location: East embankment to Eagle Creek.

Camera Direction: NE

Date/Time: May 19, 2021/ 09:53AM



IMGP0019

Description: Vehicle reservoir with pink liquid inside.

Location: On a vehicle located along east embankment of Eagle Creek.

Camera Direction: NNE

Date/Time: May 19, 2021/ 10:02AM



IMGP0020

Description: Concrete in this area slopes downhill toward Eagle Creek with leaves and debris.
Top of rounded concrete object observed which was full of debris.

Location: East enbankment to Eagle Creek.

Camera Direction: NE

Date/Time: May 19, 2021/ 10:09AM



IMGP0021

Description: Concrete in this area slopes downhill toward Eagle Creek.

Location: East embankment to Eagle Creek.

Camera Direction: NE

Date/Time: May 19, 2021/ 10:09AM



IMGP0022

Description: Large circular metal object observed protruding from ground.

Location: East embankment to Eagle Creek.

Camera Direction: NE

Date/Time: May 19, 2021/ 10:16AM



IMGP0023

Description: Covered storage area with transmissions and car engines.

Location: Storage area east of office.

Camera Direction: S
Date/Time: May 19, 2021/ 10:24AM



IMGP0024

Description: Diesel fuel storage tank and antifreeze storage tank in white secondary drum.

Location: East of shop area.

Camera Direction: SW

Date/Time: May 19, 2021/10:25AM



IMGP0025

Description: Disjointed drain plug from secondary containment structure.

Location: East of shop area.

Camera Direction: SW

Date/Time: May 19, 2021/ 10:27:AM



IMGP0026

Description: Engine oil storage tank.

Location: East of shop area.

Camera Direction: SW

Date/Time: May 19, 2021/ 10:28AM



IMGP0027

Description: Shop area.

Location: East of office.

Camera Direction: W

Date/Time: May 19, 2021/ 10:29AM



IMGP0028

Description: Freon recovery unit.

Location: In shop building.

Camera Direction: S

Date/Time: May 19, 2021/ 10:32AM