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:
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Ryan Shaul, Counterman, (317) 484-9780, happyauto@sbcglobal.net

Report Prepared by:
John "Jack" J. Bajor, Jr., Environmental Engineer
Water Enforcement and Compliance Assurance Branch, Section 2

Inspector Signature: Bajor, John Digitally signed by Bajor, John Date: 2021.07.15 15:14:56 -05'00'

Approver: Ryan Bahr, Section 2 Chief, Water Enforcement and Compliance Assurance Branch

Approver Signature and Date: RYAN BAHR Digitally signed by RYAN BAHR Date: 2021.07.15 16:53:14 -05'00'

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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 ares 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.

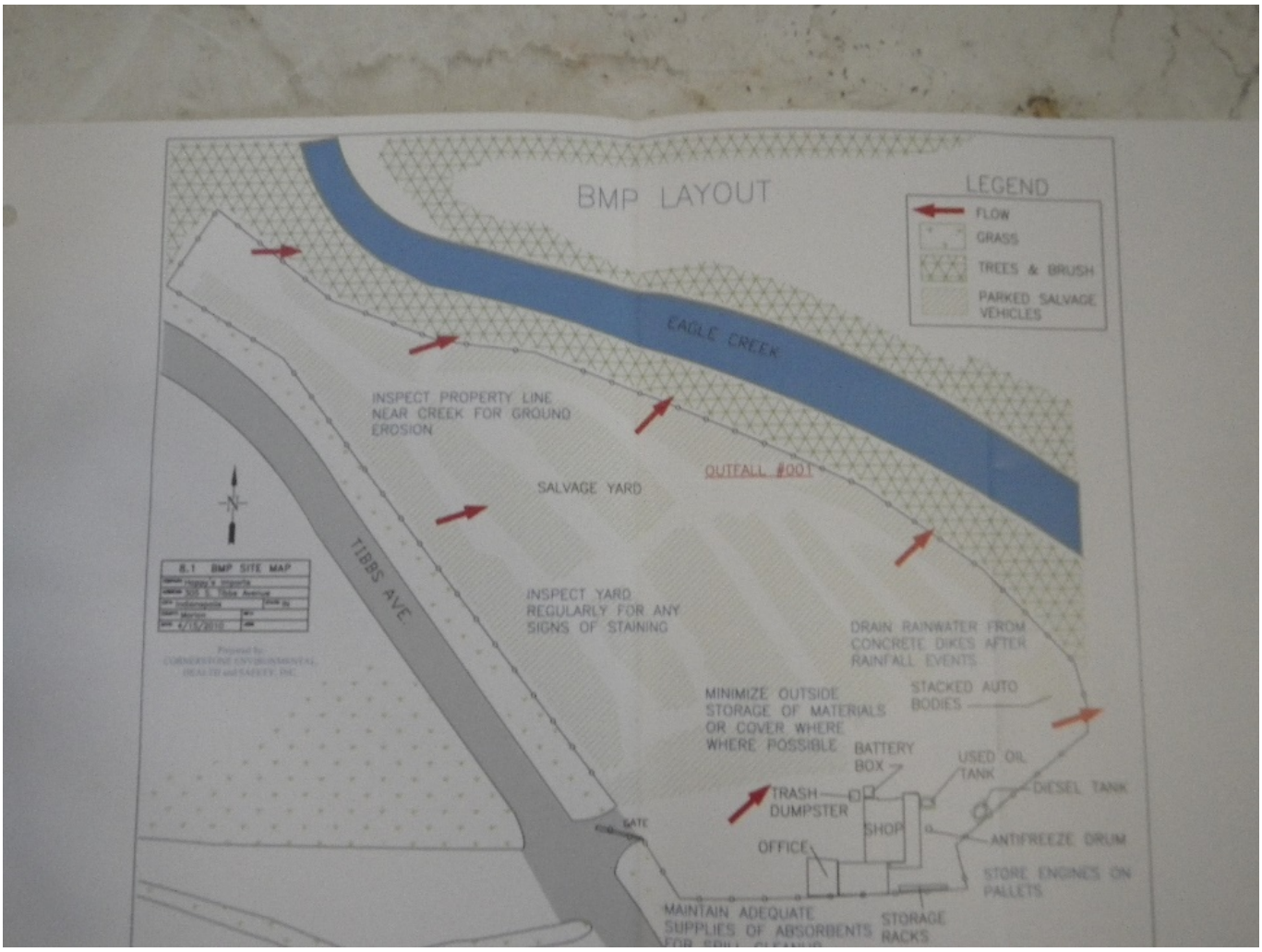
LIST OF ATTACHMENTS

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



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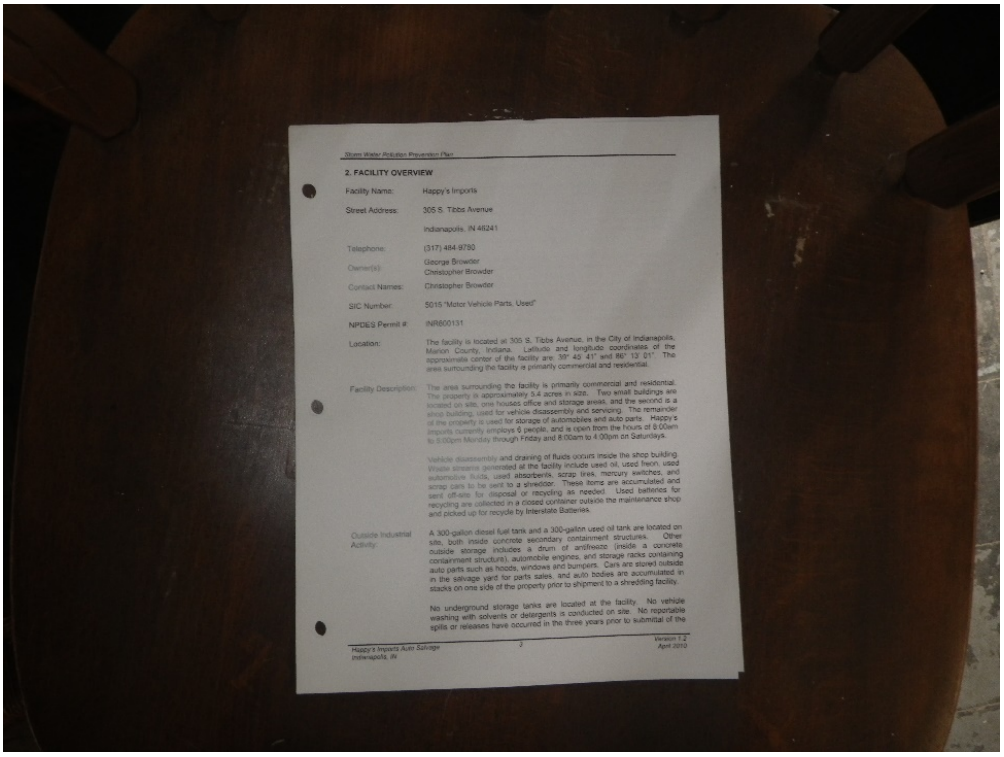
Location: SWPPP.
Camera Direction: Down.
Date/Time: May 19, 2021/ 09:16AM



2. FACILITY OVERVIEW

Facility Name:	Happy's Imports
Street Address:	305 S. Tibbs Avenue Indianapolis, IN 46241
Telephone:	(317) 484-9780
Owner(s):	George Browder Christopher Browder
Contact Names:	Christopher Browder
SIC Number:	5015 "Motor Vehicle Parts, Used"
NPDES Permit #:	INR600131
Location:	The facility is located at 305 S. Tibbs Avenue, in the City of Indianapolis, Marion County, Indiana. Latitude and longitude coordinates of the approximate center of the facility are: 39° 45' 41" and 86° 13' 01". The area surrounding the facility is primarily commercial and residential.
Facility Description:	The area surrounding the facility is primarily commercial and residential. The property is approximately 5.4 acres in size. Two small buildings are located on site, one houses office and storage areas, and the second is a shop building, used for vehicle disassembly and servicing. The remainder of the property is used for storage of automobiles and auto parts. Happy's Imports currently employs 9 people, and is open from the hours of 8:00am to 5:00pm Monday through Friday and 8:00am to 4:00pm on Saturdays. Vehicle disassembly and draining of fluids occurs inside the shop building. Waste streams generated at the facility include used oil, used freon, used automotive fluids, used absorbents, scrap tires, mercury switches, and scrap cars to be sent to a shredder. These items are accumulated and sent off-site for disposal or recycling as needed. Used batteries for recycling are collected in a closed container outside the maintenance shop and picked up for recycle by Interstate Batteries.
Outside Industrial Activity:	A 300-gallon diesel fuel tank and a 300-gallon used oil tank are located on site, both inside concrete secondary containment structures. Other outside storage includes a drum of antifreeze (inside a concrete containment structure), automobile engines, and storage racks containing auto parts such as hoods, windows and bumpers. Cars are stored outside in the salvage yard for parts sales, and auto bodies are accumulated in stacks on one side of the property prior to shipment to a shredding facility. No underground storage tanks are located at the facility. No vehicle washing with solvents or detergents is conducted on site. No reportable spills or releases have occurred in the three years prior to submittal of the

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IMGP0002
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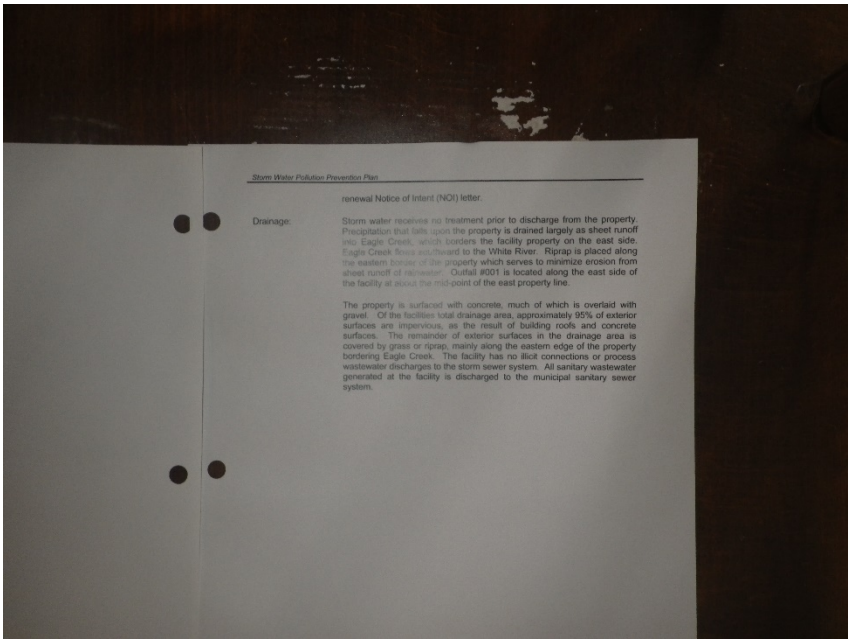
Camera Direction: Down.
Date/Time: May 19, 2021/ 09:19AM



Storm Water Pollution Prevention Plan

renewal Notice of Intent (NOI) letter.

Drainage: Storm water receives no treatment prior to discharge from the property. Precipitation that falls upon the property is drained largely as sheet runoff into Eagle Creek, which borders the facility property on the east side. Eagle Creek flows southward to the White River. Riprap is placed along the eastern border of the property which serves to minimize erosion from sheet runoff of rainwater. Outfall #001 is located along the east side of the facility at about the mid-point of the east property line.

The property is surfaced with concrete, much of which is overlaid with gravel. Of the facilities total drainage area, approximately 95% of exterior surfaces are impervious, as the result of building roofs and concrete surfaces. The remainder of exterior surfaces in the drainage area is covered by grass or riprap, mainly along the eastern edge of the property bordering Eagle Creek. The facility has no illicit connections or process wastewater discharges to the storm sewer system. All sanitary wastewater generated at the facility is discharged to the municipal sanitary sewer system.

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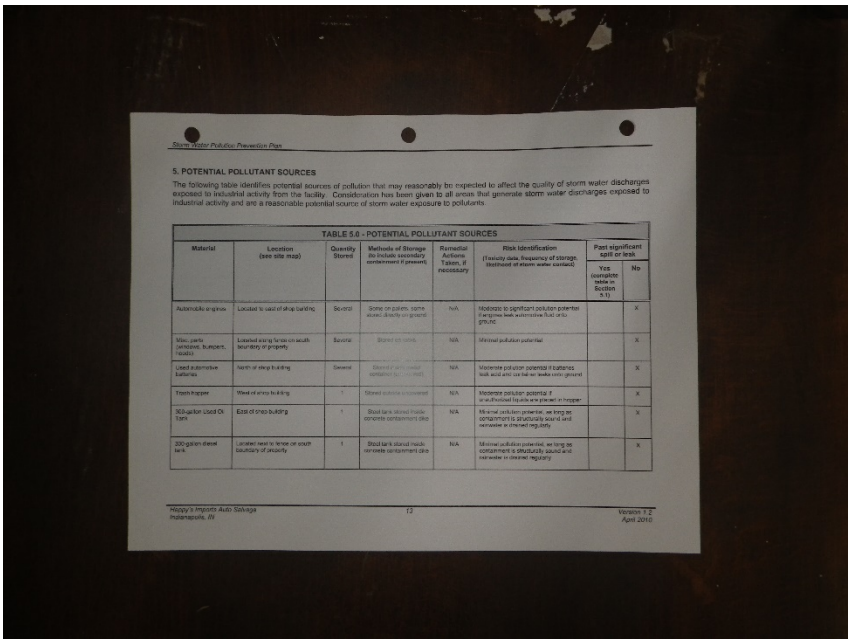
Location: SWPPP.
Camera Direction: Down.
Date/Time: May 19, 2021/ 09:20AM



Storm Water Pollution Prevention Plan

5. POTENTIAL POLLUTANT SOURCES

The following table identifies potential sources of pollution that may reasonably be expected to affect the quality of storm water discharges exposed to industrial activity from the facility. Consideration has been given to all areas that generate storm water discharges exposed to industrial activity and are a reasonable potential source of storm water exposure to pollutants.

TABLE 5.0 - POTENTIAL POLLUTANT SOURCES

Material	Location (see site map)	Quantity Stored	Methods of Storage (to include secondary containment if present)	Remedial Actions Taken, if necessary	Risk Identification (Toxicity data, frequency of storage, likelihood of storm water contact)	Past significant spill or leak	
						Yes (complete information in Section 5.1)	No
Automobile engines	Located to west of shop building	Several	Some on pallets, some stored directly on ground	N/A	Moderate to significant pollution potential if engines leak automotive fluid onto ground		X
Misc. parts (windows, bumpers, doors)	Located along fence on south boundary of property	Several	Stored on racks	N/A	Minimal pollution potential		X
Used automotive batteries	North of shop building	Several	Stored in wire cages contained by concrete	N/A	Moderate pollution potential if batteries leak acid and car batteries leaks onto ground		X
Trash hopper	West of shop building	1	Stored outside uncovered	N/A	Moderate pollution potential if unauthorized liquids are placed in hopper		X
300-gallon Used Oil Tank	East of shop building	1	Steel tank stored inside concrete containment dike	N/A	Minimal pollution potential, as long as containment is structurally sound and rainwater is checked regularly		X
200-gallon diesel tank	Located near to fence on south boundary of property	1	Steel tank stored inside concrete containment dike	N/A	Minimal pollution potential, as long as containment is structurally sound and rainwater is checked regularly		X

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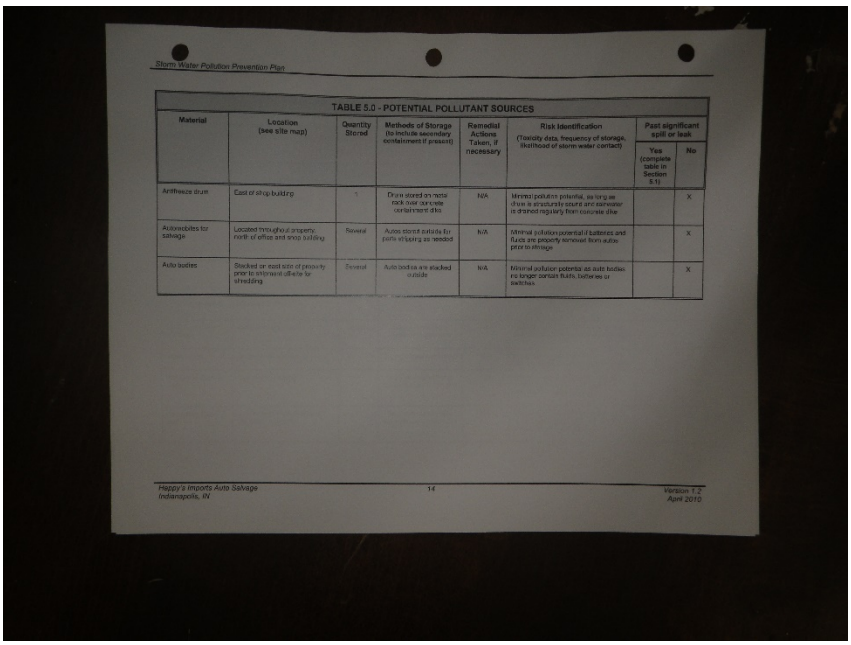
IMGP0004
Description: Potential pollutant sources.
Location: SWPPP.
Camera Direction: Down.

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)	Remedial Actions Taken, if necessary	Risk Identification (Toxicity 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 metal rack over concrete containment dike	N/A	Minimal pollution potential, as long as drum is structurally sound and rainwater is drained regularly from curcular dike		X
Automobiles for salvage	Located throughout property north of office and shop building	Several	Autos stored outside for parts w/salvag as needed	N/A	Minimal pollution potential if batteries and fluids are properly removed from autos prior to storage		X
Auto bodies	Stacked on east side of property prior to shipment off-site for shredding	Several	Auto bodies are stacked outside	N/A	Minimal pollution potential as auto bodies no longer contain fluids, batteries or switches		X

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IMGP0005
Description: Potential pollutant sources.
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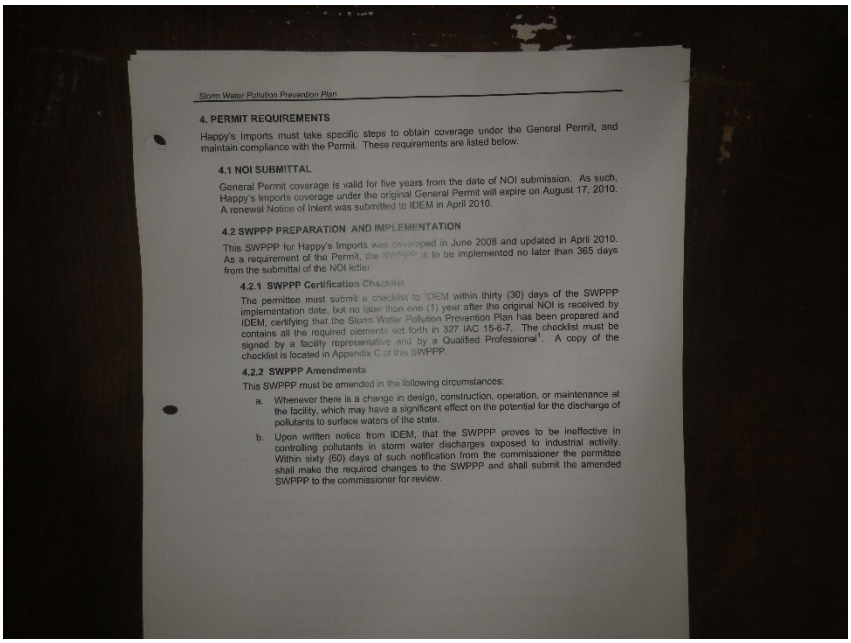
Camera Direction: Down.
Date/Time: May 19, 2021/ 09:20AM



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[1]. A copy of the checklist is located in Appendix C of this SWPPP.

4.2.2 SWPPP Amendments

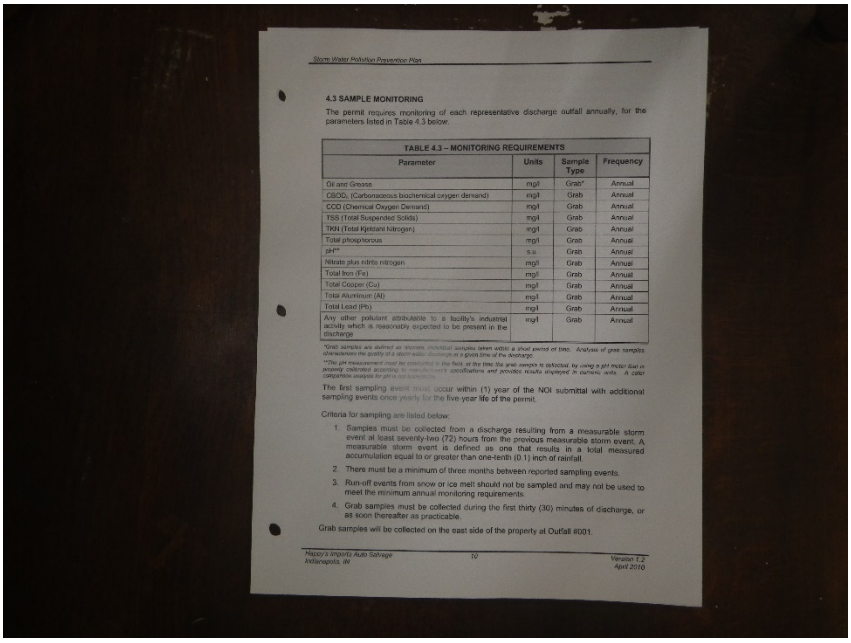
This SWPPP must be amended in the following circumstances:

a. 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.

b. 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



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4.3 SAMPLE MONITORING

The permit requires monitoring of each representative discharge outfall annually, for the parameters listed in Table 4.3 below:

TABLE 4.3 – MONITORING REQUIREMENTS

Parameter	Units	Sample Type	Frequency
Oil and Grease	mg/l	Grab*	Annual
CBOD$_5$ (Carbonaceous biochemical oxygen demand)	mg/l	Grab	Annual
COD (Chemical Oxygen Demand)	mg/l	Grab	Annual
TSS (Total Suspended Solids)	mg/l	Grab	Annual
TKN (Total Kjeldahl Nitrogen)	mg/l	Grab	Annual
Total phosphorous	mg/l	Grab	Annual
pH**	s.u.	Grab	Annual
Nitrate plus nitrite nitrogen	mg/l	Grab	Annual
Total Iron (Fe)	mg/l	Grab	Annual
Total Copper (Cu)	mg/l	Grab	Annual
Total Aluminum (Al)	mg/l	Grab	Annual
Total Lead (Pb)	mg/l	Grab	Annual
Any other pollutant attributable to a facility's industrial activity which is reasonably expected to be present in the discharge	mg/l	Grab	Annual

*Grab samples are defined as discrete, individual samples taken within a short period of time. Analysis of grab samples characterizes the quality of a storm water discharge at a given time of the discharge.

**The pH measurement must be conducted in the field, at the time the grab sample is collected, by using a pH meter that is properly calibrated according to manufacturer's specifications and provides results expressed in numeric units. A label composition analysis for pH is not acceptable.

The first sampling event must occur within (1) year of the NOI submittal with additional sampling events once yearly for the five-year life of the permit.

Criteria for sampling are listed below:

1. Samples must be collected from a discharge resulting from a measurable storm event at least seventy-two (72) hours from the previous measurable storm event. A measurable storm event is defined as one that results in a total measured accumulation equal to or greater than one-tenth (0.1) inch of rainfall.
2. There must be a minimum of three months between reported sampling events.
3. Run-off events from snow or ice melt should not be sampled and may not be used to meet the minimum annual monitoring requirements.
4. Grab samples must be collected during the first thirty (30) minutes of discharge, or as soon thereafter as practicable.

Grab samples will be collected on the east side of the property at Outfall #001.

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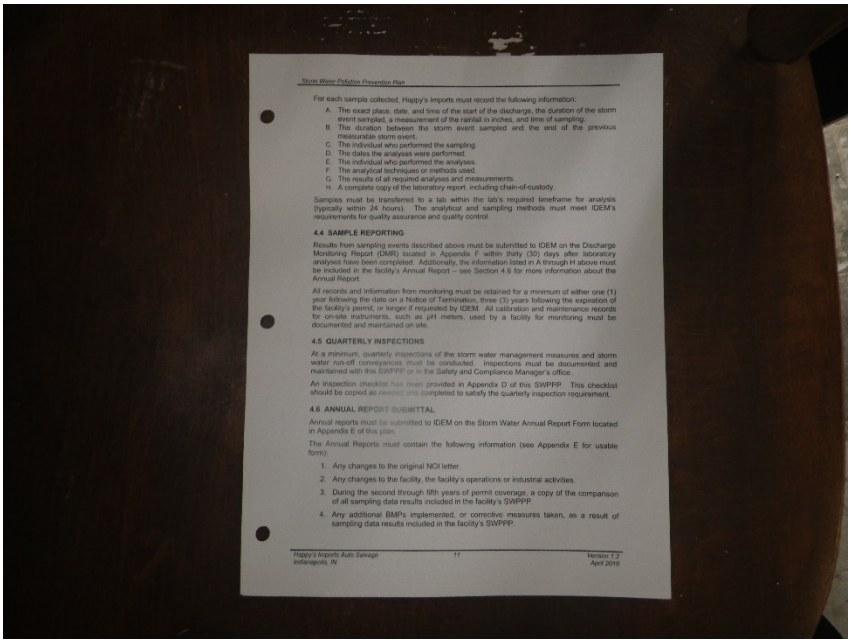
IMGP0007
Description: NPDES permit monitoring requirements.
Location: SWPPP.
Camera Direction: Down.
Date/Time: May 19, 2021/ 09:24AM



Storm Water Pollution Prevention Plan

For each sample collected, Happy's Imports must record the following information:

A. The exact place, date, and time of the start of the discharge, the duration of the storm event sampled, a measurement of the rainfall in inches, and time of sampling.
B. The duration between the storm event sampled and the end of the previous measurable storm event.
C. The individual who performed the sampling.
D. The dates the analyses were performed.
E. The individual who performed the analyses.
F. The analytical techniques or methods used.
G. The results of all required analyses and measurements.
H. A complete copy of the laboratory report, including chain-of-custody.

Samples must be transferred to a lab within the lab's required timeframe for analysis (typically within 24 hours). The analytical and sampling methods must meet IDEM's requirements for quality assurance and quality control.

4.4 SAMPLE REPORTING

Results from sampling events described above must be submitted to IDEM on the Discharge Monitoring Report (DMR) located in Appendix F within thirty (30) days after laboratory analyses have been completed. Additionally, the information listed in A through H above must be included in the facility's Annual Report – see Section 4.6 for more information about the Annual Report.

All records and information from monitoring must be retained for a minimum of either one (1) year following the date on a Notice of Termination, three (3) years following the expiration of the facility's permit, or longer if requested by IDEM. All calibration and maintenance records for on-site instruments, such as pH meters, used by a facility for monitoring must be documented and maintained on site.

4.5 QUARTERLY INSPECTIONS

At a minimum, quarterly inspections of the storm water management measures and storm water run-off conveyances must be conducted. Inspections must be documented and maintained with this SWPPP or in the Safety and Compliance Manager's office.

An inspection checklist has been provided in Appendix D of this SWPPP. This checklist should be copied as needed and completed to satisfy the quarterly inspection requirement.

4.6 ANNUAL REPORT SUBMITTAL

Annual reports must be submitted to IDEM on the Storm Water Annual Report Form located in Appendix E of this plan.

The Annual Reports must contain the following information (see Appendix E for usable form):

1. Any changes to the original NOI letter.
2. Any changes to the facility, the facility's operations or industrial activities.
3. During the second through fifth years of permit coverage, a copy of the comparison of all sampling data results included in the facility's SWPPP.
4. Any additional BMPs implemented, or corrective measures taken, as a result of sampling data results included in the facility's SWPPP.

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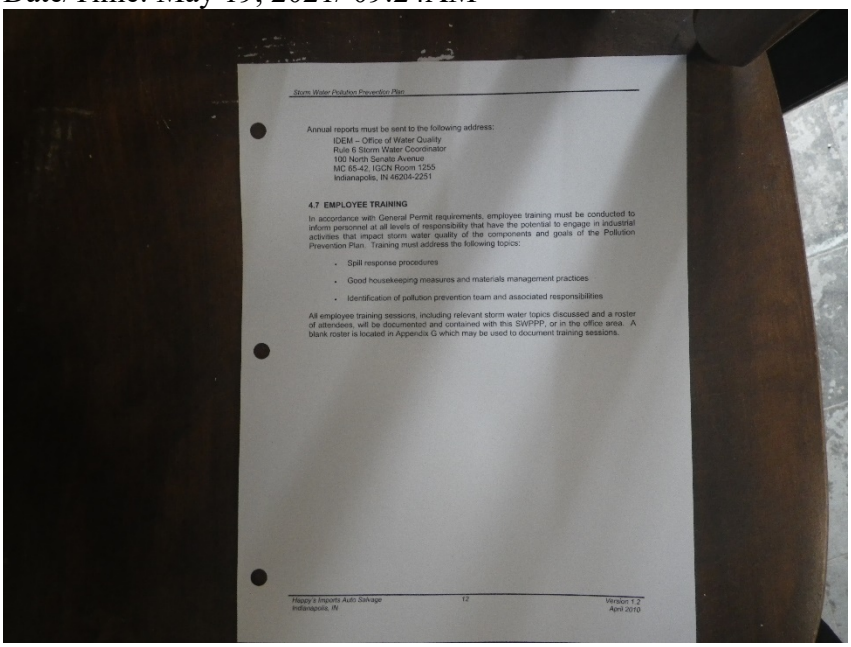
IMGP0008
Description: NPDES reporting requirements.
Location: Down.
Camera Direction: SWPPP.
Date/Time: May 19, 2021/ 09:24AM



Storm Water Pollution Prevention Plan

Annual reports must be sent to the following address:

IDEM – Office of Water Quality
Rule 6 Storm Water Coordinator
100 North Senate Avenue
MC 65-42, IGCN Room 1255
Indianapolis, IN 46204-2251

4.7 EMPLOYEE TRAINING

In accordance with General Permit requirements, employee training must be conducted to inform personnel at all levels of responsibility that have the potential to engage in industrial activities that impact storm water quality of the components and goals of the Pollution Prevention Plan. Training must address the following topics:

- Spill response procedures
- Good housekeeping measures and materials management practices
- Identification of pollution prevention team and associated responsibilities

All employee training sessions, including relevant storm water topics discussed and a roster of attendees, will be documented and contained with this SWPPP, or in the office area. A blank roster is located in Appendix G which may be used to document training sessions.

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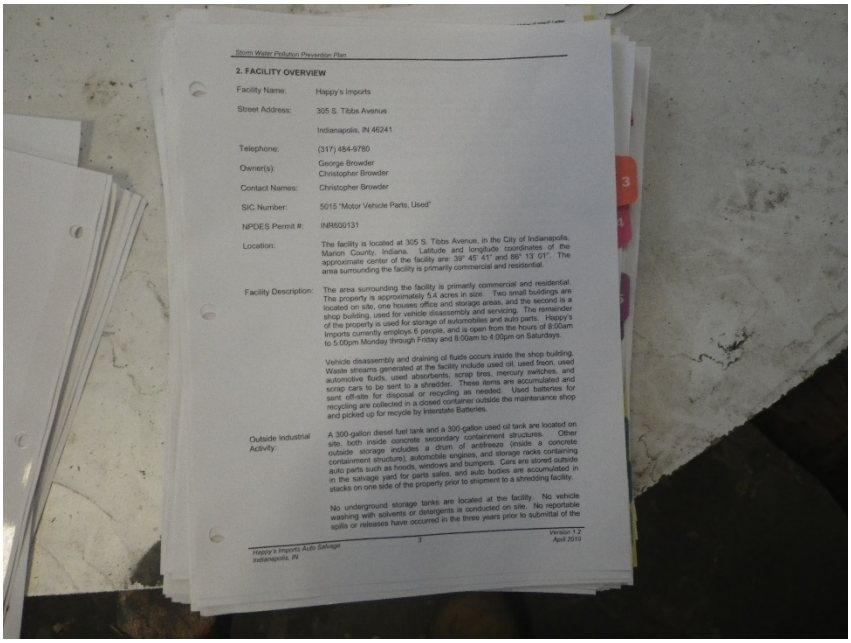
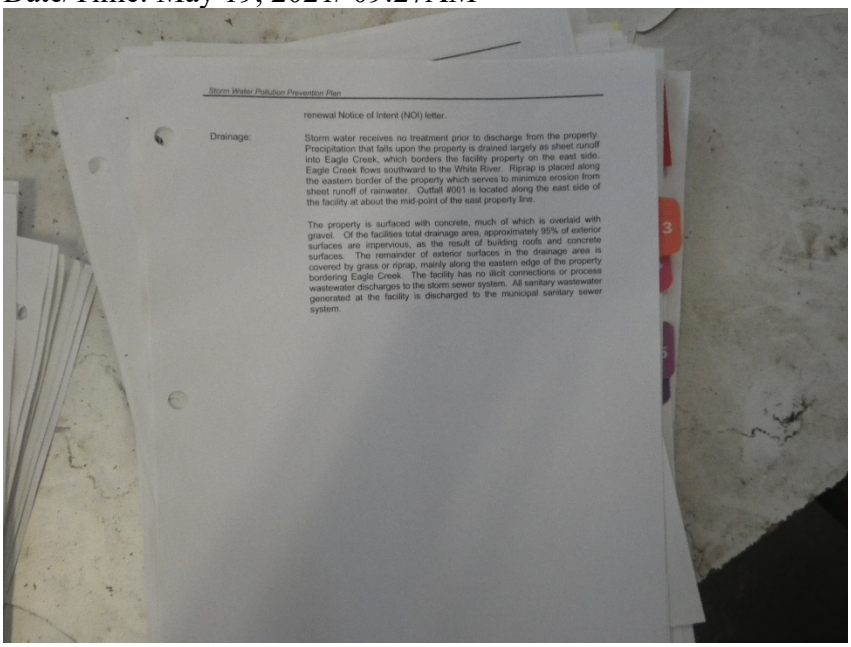
IMGP0009/010 (duplicate)
Description: NPDES permit training requirements.
Location: SWPPP.
Camera Direction: Down.
Date/Time: May 19, 2021/ 09:24AM



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 enbankment to Eagle Creek.
Camera Direction: NE
Date/Time: May 19, 2021/ 09:53AM

IMGP0017
Description: Vehicles stored along enbankment 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 enbankment 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 enbankment 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 enbankment 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 enbankment to Eagle Creek.
Camera Direction: NE
Date/Time: May 19, 2021/ 10:16AM

IMGP0023
Description: Covered storage area with transmissions and car engines.
Location: Storge 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