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**From:** John Catalano <john@bionicaautoparts.com>  
**Sent:** Thursday, May 16, 2019 8:43 AM  
**To:** Renante Marante  
**Cc:** John Catalano Jr; Sara Hamidovic  
**Subject:** Re: Notice of Proposed Rules - Large Recycling Facilities

Is it possible to separate this proposal to existing facilities, then rules for new facilities , then rules for expanding facilities its seems very confusing.

We also comply now with a lot of the issues you are asking for when we apply for our license.

We have been in business for 42 years and we pride ourselves in a clean operation with a certificate from Illinois green car, United Recycler group ,Our national group ARA Gold Seal,Team PRP Group,

For Bionic to stay compliant we have to stay within there guide lines .( see attachment )

Measurements of fence we did comply for over 42 years, engineer why the extra cost ? Fire prevention we are inspected 2 to 3 times a year by the Fire dept,over head view we would have to higher some one from a drone operator,

Other burdens = now have to give one full week sick pay that the City of Chicago has put a new rule in place,increase minimum wages.Inspections from CDPH twice a month these issues take up our time.

It is getting very expensive to do Business in Chicago !! Our property tax and state tax helps fund a huge amount cost in the city county and state taxes,

Also you are asking for special equipment to keep our facility clean also( maintain pot holes ?? )

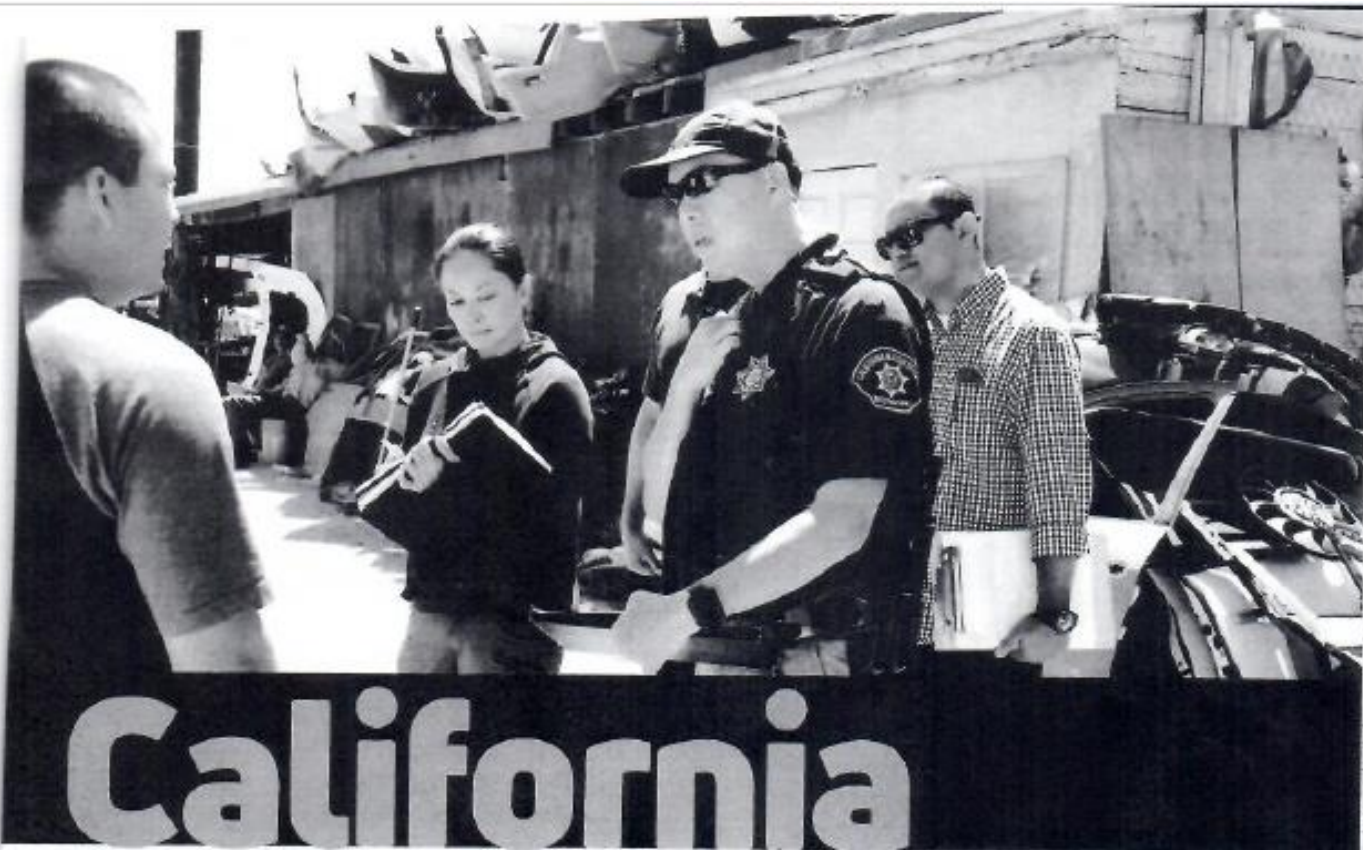
I can understand that some people don't follow the rules, we do.

I also notice this proposal does not apply to small operation so they have a advantage over us with not having to follow the same costly rules the City of Chicago are proposing CDPH will find out small operation are more likely to be the culprit in EPA violation then the big and understand it's harder to Police because there are so many.At least make the playing field fair.for all of us .

Last we have a consultant on retainer from Vet environmental takes care all EPA regulation for us and Illinois Green car also OSHA regulation .If all operation follow Illinois Green Car which is sponsored by State of Illinois IEPA. they would be in code .

CDPH you invited to view our operation before you go forward with some or all regulations .Please contact me at anytime 8:00 am to 5:00 pm Monday thru Friday 1 773 489 6020 ex 308

John Catalano President



# California

## Crack Down

The DMV's Investigations Division takes on unlicensed vehicle dismantlers. These rogue businesses generate about 200 million gallons of toxic liquid in the state alone.

By Artemio Armenta



Investigators with the California Department of Motor Vehicles (DMV) since 2017 have conducted two dozen undercover enforcement operations throughout the state, aimed at unlicensed vehicle dismantlers.

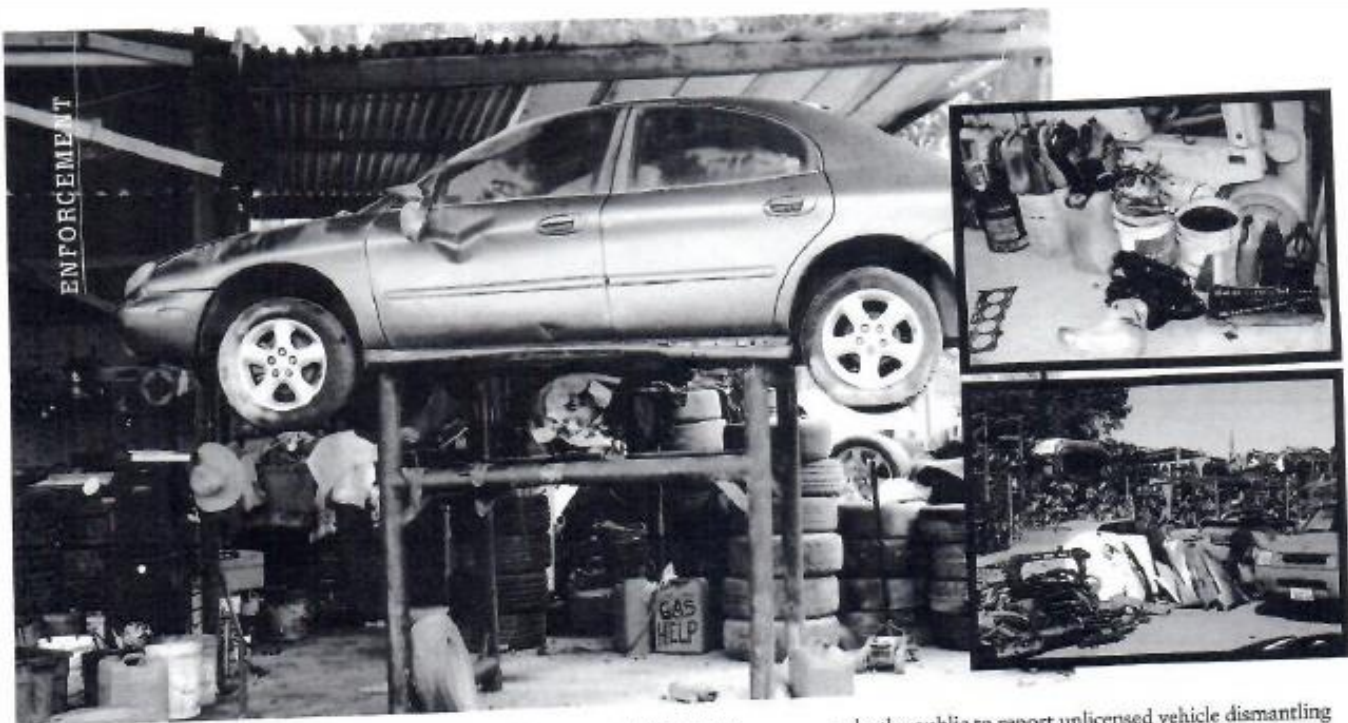
The campaign to catch and fine unlicensed vehicle dismantlers is underway by a newly created multi-agency task force made up of several state departments, headed by the DMV's Investigations Division. Governor Jerry Brown signed Assembly Bill 1858 in September 2016 that formed the task force to investigate tax evasion, environmental damage, and public harm that occurs because of unlicensed vehicle dismantling.

The law also established the Vehicle Industry Dismantler Strike Team (VDIST), which is made up of 14 DMV investigators who are sworn police officers and are charged with regulating the vehicle dismantler industry as part of their duties.

The DMV is leading the effort with representatives from the California Environmental Protection Agency, Department of Toxic Substances Control, State Water







As witnessed above, unlicensed auto dismantlers not only affect the auto recycling industry, they affect local neighborhoods where residents may be exposed to toxic chemicals.

Resources Control Board, Department of Resources Recycling and Recovery, California Air Resources Board, and California Department of Tax and Fee Administration.

Since July 2017, DMV investigators have opened over 700 cases, 605 of which involved unlicensed automobile dismantling. So far, these cases have led to 370 citations for violations of unlicensed dismantler laws and other assorted crimes. Violators face a penalty of up to one year in jail and a fine of up to \$1,000. Environmental violations can carry a civil penalty of \$25,000 per violation and fines ranging from \$5,000 to \$100,000.

"It is against the law for anyone to act as a vehicle dismantler without having an established place of business, meeting specific requirements, and having a current valid license or temporary permit issued by the Department of Motor Vehicles," DMV Investigations Acting Deputy Director Mary Bienko said. "The sole mission of our Vehicle Dismantler Industry Strike Team is to identify and shut down unlicensed vehicle dismantlers."

In San Diego County, DMV investigators inspected 52 Otay Mesa vehicle dismantler businesses and issued 23 misdemeanor citations in January.

An estimated 1.2 million vehicles reach the end of their useful life annually. Toxic substances experts calculate that about 1,000 unlicensed and unregulated vehicle dismantlers process roughly 360,000 vehicles per year. These unlicensed locations generate an estimated 2 million gallons of toxic liquid such as used oil, antifreeze and solvents, which are often disposed of in storm drains or on the ground. This can lead to the contamination of nearby streams, drinking water, groundwater, and the environment.

The DMV also unveiled a statewide public awareness campaign to inform the public of the health and safety risks posed by unlicensed vehicle dismantling. The DMV

asks the public to report unlicensed vehicle dismantling activity by completing the online complaint form.

During the inspections of unlicensed vehicle dismantlers, investigations observed the mismanagement of hazardous waste and disposal of vehicle fluids on the ground. Containers of hazardous waste were found to be unlabeled, lacking lids and stored for more than 180 days.

"Unlicensed auto dismantlers not only affect the auto and recycling industries, they affect local neighborhoods where residents may be exposed to toxic chemicals and see the environmental damage," said Hansen Pang, Chief Investigator with Department of Toxic Substances Control.

Bienko said that a defective auto part could possibly contribute to a serious accident. "This is a major safety concern," she said.

Economically, this underground industry prevents the state from collecting millions of dollars in sales tax and creates unfair competition because they can sell parts cheaper. These operations do not pay workers' compensation nor provide insurance, and they pay salaries under the table.

"As long as there is metal, the car will have value, whether the components work or not," DMV Investigations Division Area Commander Randy Vera said. "For example, a Mercedes involved in a wreck may not be drivable, but its front headlight could easily sell for \$200 and the airbag for as much as \$2,000. There is a huge monetary incentive for these unlicensed dismantlers." ■



Arterio Armenta is the Public Information Officer for the California Department of Motor Vehicles. The facts in this article have been updated since this article originally ran in the Summer 2018 edition of *Law Enforcement Quarterly*, a publication by the San Diego County District Attorney's Office.

Automotive Recycling



## CASE STUDY

# State Association at Work ... with the Law

SCADA works with the Unlicensed Automobile Dismantling Task Force to shut down illegal operators.

California legislature's Bill AB-238 extends the sunset for three years on the Unlicensed Automobile Dismantling Task Force established in 2016 by AB-1858 (Santiago). AB-1858 required the establishment of a multi-agency task force to review and coordinate enforcement and compliance activity related to unlicensed and unregulated automobile dismantling, including resulting environmental and public health impacts, tax evasion that is occurring as a result of this activity, and the lack of enforcement. The task force, since named Vehicle Dismantler Industry Strike Team (VDIST), is comprised of the Department of Motor Vehicles, the California Environmental Protection Agency, the State Water Resources Control Board, the Department of Toxic Substances Control, the Department of Resources Recycling and Recovery, the California Air Resources Board and the Department of Tax and Fee Administration.

### Background

Auto dismantlers are small businesses that are occupationally licensed by the Department of Motor Vehicles to properly process End-Of-Life-Vehicles (ELVs). These processes include, but are not limited to, removing and properly recycling or disposing of unused gasoline, brake fluid, engine oil, transmission fluid, catalytic converters, antifreeze, tires, mercury switches, lead acid batteries and freon. They are also required to document and complete DMV paperwork and remit required taxes to the state. Auto dismantlers are regulated by over a dozen local, state and federal environmental, worker safety, tax and public safety agencies.

Upon completion of the environmental and DMV processes and requirements, the auto dismantler removes any reusable parts and sells them as a cost-effective option to auto body and repair shops and to the general public. Unsold parts and the rest of the vehicle are then properly recycled and disposed of following strict environmental and DMV guidelines and regulations.

### The Problem

The underground economy in California continues to be a huge dilemma facing the auto recycling industry. It is estimated that at least 30 percent of all end-of-life vehicles are being processed through a thriving underground economy of unlicensed and unregulated auto dismantlers. These mostly cash-only businesses do not face the same DMV licensing requirements, environmental regulatory requirements, insurance obligations, work place safety requirements and tax



payment liability as required by law for licensed dismantlers. The result is these bad actors enjoy a sizeable competitive advantage over the good actors when purchasing vehicles at salvage pools, insurance auctions and from the public.

The consequences of these circumstances and limited enforcement activity has led to a growing lack of compliance with DMV dealer and dismantler laws, illegal dumping and disposal of vehicles, lack of compliance with storm water permitting requirements, improper hazardous waste handling, cash-only transactions and employee payments, non-payment of sales and income taxes, car thefts, violations of worker safety protections, lack of ADA compliance and violations of advertising laws. Many of these violations and associated harm are occurring in California's most vulnerable and underserved communities.

### By the Numbers

Of the 28 million registered vehicles in California, approximately 1.2 million are disposed of annually. These can be vehicles that get old and worn out, break down and aren't worth fixing, or vehicles that are damaged beyond economical repair.

The 30% of vehicles that disappear into the underground economy and are not accounted for totals approximately 360,000 vehicles each year. Based on known revenue generated from the licensed dismantling industry, the annual lost revenue to the underground economy is estimated at \$1.5 billion dollars annually. Of that lost revenue, \$100 million is sales tax that goes uncollected.



In addition, the average vehicle accounts for more than a ton of recyclable metals and materials. They also contain toxic materials and hazardous fluids that are strictly regulated. Licensed dismantlers are required to properly remove, collect and manifest most of these materials and fluids including mercury switches, tires and batteries. The 360,000 vehicles that are unaccounted for represent nearly two million tires and two million gallons of hazardous fluids that are more than likely improperly handled and disposed of.

Industry data estimates that the cost differential per vehicle for a properly licensed and regulated auto dismantler versus a non-licensed dismantler operating in the underground economy is \$264 per vehicle. For an average sized auto dismantler processing 500 vehicles per year this adds up to an annual cost difference for the business of \$132,000 versus the unlicensed dismantler operating in the underground economy.

### Vehicle Dismantler Industry Strike Team

The VDIST conducted 24 enforcement operations in the state from July 2017 to December 2018. The DMV-led operations included participation from state environmental and tax departments, boards, and local law enforcement.

The VDIST opened a total of 706 cases during this time, 605 of which were for unlicensed automobile dismantling.

So far, these cases have led to 369 citations for violation of unlicensed automobile dismantler laws and other associated crimes.

AB-238 is intended to simply extend the sunset on the Vehicle Dismantler Industry Strike Team for three years.

The State of California Auto Dismantlers Association (SCADA) represents approximately 190 small businesses throughout California. SCADA was formed in 1969 to serve its members in the area of government relations, education, and business. SCADA members are licensed by the state Department of Motor Vehicles and take responsibility for recycling and disposing of End-of-Life Vehicles using environmentally responsible practices.

**AB 1888 Supporters in 2016 and likely supporters of AB 238:**  
 State of California Automobile Dismantlers Association  
 Automotive Recyclers Association  
 LRQ Corporation  
 Association of Deputy District Attorneys  
 Association of Environmental Health Administrators  
 Association of Los Angeles Deputy Sheriffs  
 California Coastkeeper Alliance  
 Californians Against Waste  
 California Association of Code Enforcement Officers California

California Auto Dismantlers Recyclers Alliance  
 Coalition for Clean Air  
 DTSC - Independent Review Panel  
 Institute of Scrap Recycling Industries  
 LKQ Corporation  
 Los Angeles Police Protective League  
 Pick-N-Pull  
 Riverside Sheriff's Association  
 San Diego County Auto Recyclers Association  
 Schnitzer Steel Industries Inc.  
 Valley Automotive Dismantlers Association

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N/A	Best Practices (2 Points)	Fair Practices (1 Point)	Deficient Practices (0 Points)	Score
N/A	<b>Section 1. General Business Standards</b>			
<input type="checkbox"/>	1-1. Adequate, well-graded/drainage customer parking separate from vehicle storage area. <input checked="" type="checkbox"/>	Poorly graded or drained or insufficient number of spaces <input type="checkbox"/>	Not separate from vehicle storage area <input type="checkbox"/>	2
<input type="checkbox"/>	1-2. Clean, organized, and safe reception area. <input checked="" type="checkbox"/>	Not organized or unclean <input type="checkbox"/>	Unsafe reception area <input type="checkbox"/>	2
<input type="checkbox"/>	1-3. Signs in good taste and of positive tone. <input checked="" type="checkbox"/>	Necessary signage missing. <input type="checkbox"/>	Signs not in good taste. <input type="checkbox"/>	2
<input type="checkbox"/>	1-4. Current DOL, Employee signage posted. <input checked="" type="checkbox"/>	DOL signage expired <input type="checkbox"/>	No DOL signage <input type="checkbox"/>	2
<input type="checkbox"/>	1-5. The property is free of open dumping. <input checked="" type="checkbox"/>	Minimal debris present <input type="checkbox"/>	Not free of open dumping <input type="checkbox"/>	2
<input type="checkbox"/>	1-6. Dust or smoke does not leave facility. <input checked="" type="checkbox"/>	Minimal dust suppression <input type="checkbox"/>	No dust suppression measures <input type="checkbox"/>	2
<b>Section 1. Percentage/Subtotal (12 points possible)</b>			<b>100%</b>	<b>12</b>
N/A	<b>Section 2. Recordkeeping</b>			
<input type="checkbox"/>	2-1. Used oil furnace/recycler records available for 3 years. <input checked="" type="checkbox"/>	Records not available for 3 years <input type="checkbox"/>	No records <input type="checkbox"/>	2
<input type="checkbox"/>	2-2. Antifreeze disposal/recycling records available for 3 years. <input checked="" type="checkbox"/>	Records not available for 3 years <input type="checkbox"/>	No records <input type="checkbox"/>	2
<input type="checkbox"/>	2-3. Lead acid battery recycling records available for 3 years. <input checked="" type="checkbox"/>	Records not available for 3 years <input type="checkbox"/>	No records <input type="checkbox"/>	2
<input type="checkbox"/>	2-4. R134a Bills of Lading available for 3 years. <input checked="" type="checkbox"/>	Records not available for 3 years <input type="checkbox"/>	No records <input type="checkbox"/>	2
<input type="checkbox"/>	2-5. Records from licensed waste tire recycler available for past 3 years. <input checked="" type="checkbox"/>	Records not available for 3 years <input type="checkbox"/>	No records <input type="checkbox"/>	2
<input type="checkbox"/>	2-6. SDS accessible, complete, and current. <input checked="" type="checkbox"/>	SDS Book outdated <input type="checkbox"/>	SDS Book Unavailable <input type="checkbox"/>	2
<input type="checkbox"/>	2-7. If >10 employees, in compliance with OSHA 300 Log Requirements. <input checked="" type="checkbox"/>	OSHA 300 Log outdated <input type="checkbox"/>	No OSHA 300 Log <input type="checkbox"/>	2
<b>Section 2. Percentage/Subtotal (14 points possible)</b>			<b>100%</b>	<b>14</b>
N/A	<b>Section 3. Safety Procedures</b>			
<input type="checkbox"/>	3-1. If air bags are removed, measures are taken to safely remove non-deployed airbags. <input checked="" type="checkbox"/>	No safety measures implemented <input type="checkbox"/>		2
<input type="checkbox"/>	3-2. No open burning conducted. <input checked="" type="checkbox"/>	Open burning conducted <input type="checkbox"/>		2
<input type="checkbox"/>	3-3. Building(s) well-maintained, clean, orderly, and safe. <input checked="" type="checkbox"/>	Poorly organized <input type="checkbox"/>	Unsafe <input type="checkbox"/>	2
<input type="checkbox"/>	3-4. Property well-maintained, clean, orderly, and safe. <input checked="" type="checkbox"/>	Poorly organized <input type="checkbox"/>	Unsafe <input type="checkbox"/>	2
<input type="checkbox"/>	3-5. Delivery and support vehicles are licensed and well-maintained. <input checked="" type="checkbox"/>	Not well-maintained <input type="checkbox"/>	Not licensed or unsafe <input type="checkbox"/>	2
<input type="checkbox"/>	3-6. Safety supervisor listed in visible location. <input checked="" type="checkbox"/>	Not listed <input type="checkbox"/>	Not Assigned <input type="checkbox"/>	2
<input type="checkbox"/>	3-7. Salvage vehicles stored in safe and organized manner. <input checked="" type="checkbox"/>	Not organized <input type="checkbox"/>	Unsafe <input type="checkbox"/>	2
<input type="checkbox"/>	3-8. Basic PPE is used (gloves, hard hats, shoes, clothing, shields, goggles). <input checked="" type="checkbox"/>	Some PPE <input type="checkbox"/>	No PPE <input type="checkbox"/>	2
<input type="checkbox"/>	3-9. Approved 15-minute eye wash station(s) readily accessible near corrosive materials. <input checked="" type="checkbox"/>	Not OSHA Approved or inadequate supply <input type="checkbox"/>	No eye wash stations <input type="checkbox"/>	2
<input type="checkbox"/>	3-10. Fire extinguishers readily available, fully-charged, and tagged. <input checked="" type="checkbox"/>	Expired or inadequate supply <input type="checkbox"/>	No fire extinguishers <input type="checkbox"/>	2
<input type="checkbox"/>	3-11. Stocked first aid kit is readily accessible in appropriate area. <input checked="" type="checkbox"/>	Not fully stocked or inappropriate location <input type="checkbox"/>	No first aid kit <input type="checkbox"/>	2
<input checked="" type="checkbox"/>	3-12. If Self-Service Facility, safety reminders are posted and visible. <input type="checkbox"/>	Not readily visible <input type="checkbox"/>	Not posted <input type="checkbox"/>	2
<b>Section 3. Percentage/Subtotal (24 points possible)</b>			<b>100%</b>	<b>24</b>
N/A	<b>Section 4. Safety Training</b>			
<input type="checkbox"/>	4-1. Safety program in place with regularly scheduled meetings/inspections. <input checked="" type="checkbox"/>	No regularly scheduled meetings <input type="checkbox"/>	No safety program <input type="checkbox"/>	2
<input type="checkbox"/>	4-2. All employees using cutting torch trained and follow proper protocol. <input checked="" type="checkbox"/>	Some employees trained <input type="checkbox"/>	No training or improper protocol <input type="checkbox"/>	2
<input type="checkbox"/>	4-3. All employees trained annually on HCS/GHS. <input checked="" type="checkbox"/>	Training overdue <input type="checkbox"/>	Not trained <input type="checkbox"/>	2
<input type="checkbox"/>	4-4. If shipping air bags, DOT Training within past 3 years. <input checked="" type="checkbox"/>	Training overdue <input type="checkbox"/>	Not trained <input type="checkbox"/>	2
<input type="checkbox"/>	4-5. Forklift operators trained within past 3 years. <input checked="" type="checkbox"/>	Training overdue <input type="checkbox"/>	Not trained <input type="checkbox"/>	2
<input type="checkbox"/>	4-6. All employees trained annually on back injury prevention. <input checked="" type="checkbox"/>	Training overdue <input type="checkbox"/>	Not trained <input type="checkbox"/>	2
<input type="checkbox"/>	4-7. All employees trained annually on fire safety. <input checked="" type="checkbox"/>	Training overdue <input type="checkbox"/>	Not trained <input type="checkbox"/>	2
<input checked="" type="checkbox"/>	4-8. All employees trained annually on SWPPP. <input type="checkbox"/>	Training overdue <input type="checkbox"/>	Not trained <input type="checkbox"/>	2
<b>Section 4. Percentage/Subtotal (16 points possible)</b>			<b>100%</b>	<b>16</b>



Section 8. Fluids Removal/Dismantling/Crushing					
<input type="checkbox"/>	8-1. Floor drains in dismantling area are sealed or filled with concrete.	<input checked="" type="checkbox"/>	Floor drains filled temporarily	<input type="checkbox"/> Floor drains present and unsealed	2
<input type="checkbox"/>	8-2. All fluid removals take place in a designated fluids removal area(s).	<input checked="" type="checkbox"/>	Some not in designated area	<input type="checkbox"/> Lacking a designated area	2
<input type="checkbox"/>	8-3. Designated fluid removal area on impervious surface with roof.	<input checked="" type="checkbox"/>	Gravel/dirt surface or no roof	<input type="checkbox"/> Designated area has gravel/dirt ground surface and no roof	2
<input type="checkbox"/>	8-4. Windshield wiper fluid is removed and recycled/reused.	<input checked="" type="checkbox"/>	Wiper fluid is removed and not recycled	<input type="checkbox"/> Not removed	2
<input type="checkbox"/>	8-5. Used oil, brake/steering/transmission fluid, antifreeze, and fuel removed prior to storage.	<input checked="" type="checkbox"/>	Some vehicles on yard remain undrained	<input type="checkbox"/> Fluids are not drained	2
<input type="checkbox"/>	8-6. Body plugs removed from vehicles on yard to prevent water accumulation.	<input checked="" type="checkbox"/>	Some plugs removed	<input type="checkbox"/> No plugs removed	2
<input type="checkbox"/>	8-7. Designated sellable engine/transmission storage area with roof and impervious surface.	<input checked="" type="checkbox"/>	Gravel/dirt surface or no roof	<input type="checkbox"/> No designated area or no roof and on dirt/gravel surface	2
<input type="checkbox"/>	8-8. Large cores in competent, covered containers or under roof on impervious surface.	<input checked="" type="checkbox"/>	Roof and pervious surface or outdoors in uncovered, competent containers	<input type="checkbox"/> Stored outdoors on pervious surface with no weather-proof container	2
<input type="checkbox"/>	8-9. Engines and transmissions are removed before crushing on site.	<input checked="" type="checkbox"/>	Engines and transmissions are left in vehicle when crushing	<input type="checkbox"/>	2
<input type="checkbox"/>	8-10. Crusher (if owned) inside building or under roof on impervious surface.	<input type="checkbox"/>	Outdoors on impervious surface	<input checked="" type="checkbox"/> Outdoors on pervious surface	1
<input type="checkbox"/>	8-11. Crusher area is free of spills and leaks.	<input checked="" type="checkbox"/>	No spills and only a few leaks on ground	<input type="checkbox"/> Multiple spills and leaks on ground	2
<input type="checkbox"/>	8-12. Oil filters remain on sellable engines or voids capped to prevent leaking.	<input checked="" type="checkbox"/>	Voids on sellable engines are not capped	<input type="checkbox"/>	2
<b>Section 8. Subtotal/Percentage (24 points possible)</b>			<b>96%</b>		<b>23</b>
Section 9. Mercury Management					
<input type="checkbox"/>	9-1. All Mercury switches removed prior to storage on yard.	<input checked="" type="checkbox"/>	Container is in poor condition or lid is not sealed	<input type="checkbox"/> Switches not stored in collection bucket	2
<input type="checkbox"/>	9-2. Mercury collection bucket in good condition and sealed unless adding switches.	<input checked="" type="checkbox"/>	Bucket not sealed	<input type="checkbox"/> Bucket in poor condition	2
<input type="checkbox"/>	9-3. Mercury collection bucket has accumulated switches for less than one year.	<input checked="" type="checkbox"/>	Accumulating for more than one year		2
<input type="checkbox"/>	9-4. Mercury container labeled "Universal Waste" and accumulation start date indicated.	<input checked="" type="checkbox"/>	Not properly labeled		2
<input type="checkbox"/>	9-5. Employees receive annual mercury safety training.	<input checked="" type="checkbox"/>	Not trained or not properly documented		2
<input type="checkbox"/>	9-6. Mercury spill kit is readily accessible in dismantling area.	<input checked="" type="checkbox"/>	<input type="checkbox"/> Not in dismantling area	<input type="checkbox"/> No Mercury spill kit	2
<b>Section 9. Percentage/Subtotal (12 points possible)</b>			<b>100%</b>		<b>12</b>
Section 10. Waste Tire Management					
<input type="checkbox"/>	10-1. Facility has waste tire storage <1,000 outside or <2,000 inside.	<input checked="" type="checkbox"/>	More than 2,000 tires stored inside	<input type="checkbox"/> More than 1,000 tires stored outside	2
<input type="checkbox"/>	10-2. Waste tires stored in a manner that prevents water accumulation.	<input checked="" type="checkbox"/>	Tires allowing weed growth	<input type="checkbox"/> Tires accumulating water	2
<input type="checkbox"/>	10-3. Waste tires are stored more than 25 feet from the nearest building.	<input checked="" type="checkbox"/>	Waste tire pile less than 25 feet from nearest building		2
<b>Section 10. Percentage/Subtotal (6 points possible)</b>			<b>100%</b>		<b>6</b>
Section 11. Lead Acid Battery Management					
<input type="checkbox"/>	11-1. All lead acid batteries are removed prior to storage on yard and then recycled.	<input checked="" type="checkbox"/>	Some batteries removed	<input type="checkbox"/> Batteries not removed	2
<input type="checkbox"/>	11-2. Lead acid batteries stored inside covered storage area with impervious surface.	<input checked="" type="checkbox"/>	Covered area with no impervious surface	<input type="checkbox"/> No cover, no impervious surface	2
<input type="checkbox"/>	11-3. Lead acid batteries stacked, at maximum, three batteries tall.	<input checked="" type="checkbox"/>	Stacked over three batteries tall	<input type="checkbox"/> Covered storage area absent or no impervious surface	2
<b>Section 11. Percentage/Subtotal (6 points possible)</b>			<b>100%</b>		<b>6</b>
Section 12. Refrigerant Management					
<input type="checkbox"/>	12-1. Refrigerants are removed prior to storage on the yard.	<input checked="" type="checkbox"/>	Refrigerants removed but no documentation	<input type="checkbox"/> Refrigerants not removed	2
<input type="checkbox"/>	12-2. Employees are trained to remove and capture refrigerants.	<input checked="" type="checkbox"/>	Trained but not documented	<input type="checkbox"/> Not trained	2
<input type="checkbox"/>	12-3. Refrigerants collected and stored in EPA approved devices.	<input checked="" type="checkbox"/>	Not collected or stored in EPA approved devices	<input type="checkbox"/> Refrigerants released into atmosphere	2
<b>Section 12. Subtotal/Percentage (6 points possible)</b>			<b>100%</b>		<b>6</b>



Item Rows Filled with Light Grey Require Photo.

**PHOTOS**



Curbside Photo of Business



1-1. Customer Parking Area



1-2. Sales Counter and Customer Reception Area



1-3. Signs in Customer Reception Area



1-4. DOL Employee Signage Posted in Visible Area



2-6. SDS Binder in Accessible Area



2-7. OSHA 300 Log Posted in Visible Area



3-6. Safety Supervisor Listed in Visible Area



3-7. Vehicle Storage Yard



3-8. Basic Personal Protective Equipment



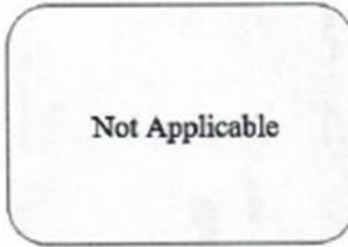
3-9. 15-Minute Eye Wash Station



3-10. Fire Extinguisher (Tag Visible)



3-11. Stocked First Aid Kit in Accessible Area



3-12. If Self-Service, Safety Reminders Posted in Visible Area



6-1. Fluids Secondary Containment and Precipitation Protection