

**From:** aero auto parts  
**Sent:** Friday, June 7, 2019 1:11:31 PM (UTC-06:00) Central Time (US & Canada)  
**To:** envcomments  
**Subject:** Proposed rules For Large Recycling Facilities

To Whom it May Concern,

I'm writing in opposition to the Proposed rules for Large Recycling Facilities. My family owns and operates Aero Auto Parts, a small automotive recycling facility in Chicago's Englewood neighborhood. We are a small business that is right on the border of the definitions of a "large recycling facility" by the new proposed rules. These rules would be incredibly costly to put into place for a small family owned and operated business. The vast majority of auto recyclers in this country are small family owned businesses. We hope very much, not to be regulated out of business. In the USA over 12 million vehicles are recycled every year, and businesses like ours are a very important part of the responsible processing of these junk vehicles, especially in a big city like Chicago. We safely collect and recycle all fluids, Freon, mercury switches, batteries, and tires. We already follow self imposed, voluntary, strict guidelines as award winning members of the Illinois Green Car Program. I will attach a copy of our 2019 Illinois Green Car Audit and results for reference. As members of this program we work with VET Environmental Engineering, and therefore have an Illinois Licensed Professional Engineer on retainer to guide us and our peers in the right direction. Many auto recycling facilities occupy over 2.5 acres of land but we are still small recycling facilities. We use this land primarily for storage of salvaged vehicles. This is our inventory and essentially warehouse space. We only actively recycle on a much smaller plot of land. We ship very low volumes of material.

We provide essential low cost recycled auto parts to our surrounding communities. We sell used original equipment parts for all different makes and models that fit better and work just as well or better than newly produced aftermarket parts. The use of these used car parts saves countless resources that go into producing the new aftermarket car parts. Today's successful automotive recyclers are green businesses that add significantly to Chicago's capacity to recycle and be a greener city.

There are definitions within the proposed rules that just don't add up. The rules state a large recycling facility is one that ships over 250 tons per day or occupies over 2.5 acres of land. 250 tons per day is a lot of recycled material and does constitute a large recycling facility. However 2.5 acres is a very small automotive recycling yard that holds very limited inventory, and processes very few vehicles and very limited tonnage. We ship approximately 8 tons of material per week. That's only 1.33 tons per day. (we operate six days a week) I don't believe a facility that ships 1.33 tons per day should have to adhere to the same set of rules as one that ships over 250 tons per day. Perhaps Class 4A automotive recycling yards could be exempt from these new rules all together. The old rules seem appropriate to regulate our industry. If that is too much to ask, perhaps we could be exempt as long as we are actively participating in the Illinois Green Car Program? These new proposed rules would be financially crushing to small business like Aero Auto Parts. I ask you to please reconsider implementing the new proposed rules as currently written.

Thank you  
Andrew Mistretta  
Aero Auto Parts  
cell:708-526-1799

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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/drained customer parking separate from vehicle storage area. <input checked="" type="checkbox"/>	Poorly graded/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 debris. <input checked="" type="checkbox"/>	Minimal debris present <input type="checkbox"/>	Excessive debris present <input type="checkbox"/>	2
<input type="checkbox"/>	1-6. The property is free of open dumping. <input checked="" type="checkbox"/>	Not free of open dumping <input type="checkbox"/>		2
<input type="checkbox"/>	1-7. Vegetation is regularly maintained. <input checked="" type="checkbox"/>	Some weeds - nuisance <input type="checkbox"/>	Heavy weeds/trees - hazard <input type="checkbox"/>	2
<input type="checkbox"/>	1-8. Dust does not leave facility. <input checked="" type="checkbox"/>	Minimal dust suppression <input type="checkbox"/>	No dust suppression measures <input type="checkbox"/>	2
Section 1. Percentage/Subtotal (16 points possible)			100.00%	16
N/A	<b>Section 2. Recordkeeping</b>			
<input type="checkbox"/>	2-1. Record of used oil furnace use or recycling records 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"/>	2-2. Antifreeze disposal/recycling records 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"/>	2-3. Lead acid battery recycling records 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"/>	2-4. R134a Bills of Lading 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"/>	2-5. 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. Mercury switch disposal records 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"/>	2-7. Mercury switch annual report submitted to IEPA by August 15. <input type="checkbox"/>	Submitted late <input type="checkbox"/>	Not submitted <input checked="" type="checkbox"/>	0
<input type="checkbox"/>	2-8. SDS Book accessible and current. <input checked="" type="checkbox"/>	SDS Book outdated <input type="checkbox"/>	SDS Book unavailable <input type="checkbox"/>	2
<input type="checkbox"/>	2-9. 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
<input type="checkbox"/>	2-10. Posted salvage license current. <input checked="" type="checkbox"/>	Not posted/expired <input type="checkbox"/>	No salvage license <input type="checkbox"/>	2
<input type="checkbox"/>	2-11. Delivery and support vehicle license/registration current and available. <input checked="" type="checkbox"/>	Vehicle license/registration expired/unavailable <input type="checkbox"/>	Vehicles not licensed/registered <input type="checkbox"/>	2
<input type="checkbox"/>	2-12. Annual LOTO inspections complete. <input type="checkbox"/>	Overdue <input type="checkbox"/>	No LOTO inspections <input checked="" type="checkbox"/>	0
Section 2. Percentage/Subtotal (24 points possible)			83.33%	20
N/A	<b>Section 3. Safety Procedures</b>			
<input type="checkbox"/>	3-1. No open burning conducted. <input checked="" type="checkbox"/>	Open burning conducted <input type="checkbox"/>		2
<input type="checkbox"/>	3-2. 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"/>	3-3. Property organized and safe <input checked="" type="checkbox"/>	Poorly organized <input type="checkbox"/>	Slip/trip/fall hazard <input type="checkbox"/>	2
<input type="checkbox"/>	3-4. Delivery and support vehicles appear well-maintained and safe. <input checked="" type="checkbox"/>	Not well-maintained <input type="checkbox"/>	Appear unsafe <input type="checkbox"/>	2
<input type="checkbox"/>	3-5. Safety supervisor listed in location visible to customers/employees. <input checked="" type="checkbox"/>	Not listed <input type="checkbox"/>	Not assigned <input type="checkbox"/>	2
<input type="checkbox"/>	3-6. 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"/>	3-7. PPE is used (gloves, hard hats, protective shoes, clothing, shields, goggles). <input checked="" type="checkbox"/>	Some PPE <input type="checkbox"/>	No PPE <input type="checkbox"/>	2
<input type="checkbox"/>	3-8. 15-minute eye wash station(s) readily accessible near corrosive materials. <input checked="" type="checkbox"/>	Bottles only/inadequate supply/expired <input type="checkbox"/>	No eye wash supplies <input type="checkbox"/>	2
<input type="checkbox"/>	3-9. Fire extinguishers readily available, fully-charged, and tagged. <input checked="" type="checkbox"/>	Expired/not tagged/ inadequate supply <input type="checkbox"/>	No fire extinguishers <input type="checkbox"/>	2
<input type="checkbox"/>	3-10. 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"/>	3-11. 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
Section 3. Percentage/Subtotal (22 points possible)			100.00%	22

N/A	Section 4. Safety Training						
<input type="checkbox"/>	4-1. Safety program in place with regularly scheduled meetings/inspections.	<input checked="" type="checkbox"/>	No regularly scheduled meetings/inspections	<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 Hazardous Communication (HCS/GHS).	<input checked="" type="checkbox"/>	Training overdue	<input type="checkbox"/>	Not trained	<input type="checkbox"/>	2
<input checked="" type="checkbox"/>	4-4. If shipping air bags, DOT Training within past 3 years.	<input 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
Section 4. Percentage/Subtotal (16 points possible)					100.00%		16
N/A	Section 5. Storm Water Pollution Prevention						
<input checked="" type="checkbox"/>	5-1. Property evaluated for Waters of the U.S. and is in compliance.	<input type="checkbox"/>	Evaluated but not compliant	<input type="checkbox"/>	Not evaluated/not compliant	<input type="checkbox"/>	2
<input checked="" type="checkbox"/>	5-2. NOI submitted to IEPA.	<input type="checkbox"/>	Notice of Intent overdue	<input type="checkbox"/>	Notice of Intent not submitted	<input type="checkbox"/>	2
<input checked="" type="checkbox"/>	5-3. SWPPP submitted to IEPA and current.	<input type="checkbox"/>	SWPPP not submitted/expired	<input type="checkbox"/>	No SWPPP	<input type="checkbox"/>	2
<input checked="" type="checkbox"/>	5-4. Necessary storm water samples collected and submitted on time.	<input type="checkbox"/>	Storm water samples overdue	<input type="checkbox"/>	Storm water samples not collected	<input type="checkbox"/>	2
<input type="checkbox"/>	5-5. Good housekeeping inspections conducted regularly.	<input checked="" type="checkbox"/>	Inspections overdue	<input type="checkbox"/>	Not developed	<input type="checkbox"/>	2
<input type="checkbox"/>	5-6. Best Management Practice inspections conducted regularly.	<input checked="" type="checkbox"/>	Inspections overdue	<input type="checkbox"/>	Not developed	<input type="checkbox"/>	2
<input checked="" type="checkbox"/>	5-7. Facility has submitted the Storm Water Annual Report.	<input type="checkbox"/>	Overdue	<input type="checkbox"/>	Not submitted	<input type="checkbox"/>	2
<input checked="" type="checkbox"/>	5-8. SWPPP quarterly visual wet weather inspections conducted on time.	<input type="checkbox"/>	Inspections overdue	<input type="checkbox"/>	Not developed	<input type="checkbox"/>	2
Section 5. Percentage/Subtotal (16 points possible)					100.00%		16
N/A	Section 6. Fluids Storage						
<input type="checkbox"/>	6-1. Containers have secondary containment and precipitation protection.	<input checked="" type="checkbox"/>	No precipitation protection	<input type="checkbox"/>	Secondary containment absent	<input type="checkbox"/>	2
<input type="checkbox"/>	6-2. Containers have tightly sealed lids.	<input checked="" type="checkbox"/>	Lids not sealed/open bung	<input type="checkbox"/>	Lids not present/full drip pans	<input type="checkbox"/>	2
<input type="checkbox"/>	6-3. Containers labeled correctly.	<input checked="" type="checkbox"/>	Some not labeled	<input type="checkbox"/>	No containers properly labeled	<input type="checkbox"/>	2
<input type="checkbox"/>	6-4. Containers free of rust/dents/bulges.	<input checked="" type="checkbox"/>	Some rust	<input type="checkbox"/>	Bulges/dents/holes	<input type="checkbox"/>	2
<input type="checkbox"/>	6-5. Fluids storage area(s) free of spills and leaks.	<input type="checkbox"/>	No spills and only a few leaks on ground	<input checked="" type="checkbox"/>	Multiple spills and leaks on ground	<input type="checkbox"/>	1
<input type="checkbox"/>	6-6. If petroleum capacity >1,320 gal, SPCC Plan is in place.	<input checked="" type="checkbox"/>	SPCC Outdated	<input type="checkbox"/>	No SPCC	<input type="checkbox"/>	2
<input type="checkbox"/>	6-7. Empty drums are stored indoors or in manner that prevents water accumulation.	<input checked="" type="checkbox"/>	Some drums stored outdoors and upright	<input type="checkbox"/>	Drums visibly collecting water and harboring vectors	<input type="checkbox"/>	2
<input type="checkbox"/>	6-8. Facility is free of unknown materials.	<input checked="" type="checkbox"/>	Not evaluated / not free of unknown materials			<input type="checkbox"/>	2
<input type="checkbox"/>	6-9. Facility is free of UST(s) not registered with IEPA.	<input checked="" type="checkbox"/>	USTs present and not registered			<input type="checkbox"/>	2
<input type="checkbox"/>	6-10. If SPCC is in place, monthly SPCC inspections are current.	<input checked="" type="checkbox"/>	Inspections outdated or not performed on time	<input type="checkbox"/>	Not developed	<input type="checkbox"/>	2
<input type="checkbox"/>	6-11. Compressed gas cylinders upright and restrained; other cylinders stored in proper manner.	<input checked="" type="checkbox"/>	Unchained	<input type="checkbox"/>	Stored on side; excessive, old/damaged	<input type="checkbox"/>	2
Section 6. Subtotal/Percentage (22 points possible)					95.45%		21

N/A	Section 7. Fluids Management				
<input type="checkbox"/>	7-1. Fluids removal area(s) free of spills and leaks.	<input type="checkbox"/>	No spills and only a few leaks on ground <input checked="" type="checkbox"/>	Multiple spills and leaks on ground <input type="checkbox"/>	1
<input type="checkbox"/>	7-2. Used oil (55 gallons or less) is transported in a company or private vehicle.	<input checked="" type="checkbox"/>	More than 55 gallons transported w/o license <input type="checkbox"/>		2
<input type="checkbox"/>	7-3. Spent solvents managed as hazardous waste and disposed by licensed recycler.	<input checked="" type="checkbox"/>	Documentation not readily available <input type="checkbox"/>	Spent solvents are burned, discharged into sewer <input type="checkbox"/>	2
<input type="checkbox"/>	7-4. Water from pressure washing is recycled, collected for disposal, or permitted.	<input checked="" type="checkbox"/>	Wash water not recycled/collected/permited <input type="checkbox"/>		2
<input type="checkbox"/>	7-5. Sellable engine/transmission storage area(s) 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 <input type="checkbox"/>	2
7-6. Appropriate spill kits are readily accessible in the following areas:					
<input type="checkbox"/>	> Dismantling Area	<input checked="" type="checkbox"/>	Only absorbents <input type="checkbox"/>	No spill supplies <input type="checkbox"/>	2
<input type="checkbox"/>	> Large Core Storage Area	<input checked="" type="checkbox"/>	Only absorbents <input type="checkbox"/>	No spill supplies <input type="checkbox"/>	2
<input type="checkbox"/>	> Engine/Transmission Storage Area	<input checked="" type="checkbox"/>	Only absorbents <input type="checkbox"/>	No spill supplies <input type="checkbox"/>	2
<input type="checkbox"/>	> Fluids Storage Area	<input checked="" type="checkbox"/>	Only absorbents <input type="checkbox"/>	No spill supplies <input type="checkbox"/>	2
<input type="checkbox"/>	> Parts Storage Area	<input checked="" type="checkbox"/>	Only absorbents <input type="checkbox"/>	No spill supplies <input type="checkbox"/>	2
<input type="checkbox"/>	7-7. Large core storage area(s) free of spills and leaks.	<input type="checkbox"/>	No spills and only a few leaks on ground <input checked="" type="checkbox"/>	Multiple spills and leaks on ground <input type="checkbox"/>	1
<input type="checkbox"/>	7-8. Salvage vehicle storage area(s) free of spills and leaks.	<input type="checkbox"/>	No spills and only a few leaks on ground <input checked="" type="checkbox"/>	Multiple spills and leaks on ground <input type="checkbox"/>	1
<b>Section 7. Subtotal/Percentage (24 points possible)</b>				87.50%	21
N/A	Section 8. Fluids Removal/Dismantling/Crushing				
<input checked="" type="checkbox"/>	8-1. Floor drains in dismantling area are sealed or filled with concrete.	<input type="checkbox"/>	Floor drains filled temporarily <input type="checkbox"/>	Floor drains present and unsealed <input type="checkbox"/>	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 <input type="checkbox"/>	2
<input type="checkbox"/>	8-3. Designated fluid removal area on impervious surface with roof.	<input type="checkbox"/>	Gravel/dirt surface or no roof <input checked="" type="checkbox"/>	Designated area has gravel/dirt ground surface and no roof <input type="checkbox"/>	1
<input type="checkbox"/>	8-4. Windshield wiper fluid is removed and recycled/reused.	<input checked="" type="checkbox"/>	Not removed/recycled <input type="checkbox"/>		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 <input type="checkbox"/>	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 <input type="checkbox"/>	2
<input type="checkbox"/>	8-7. Sellable engine/transmission storage area has roof and impervious surface.	<input checked="" type="checkbox"/>	Gravel/dirt surface or no roof <input type="checkbox"/>	No roof and on dirt/gravel surface <input type="checkbox"/>	2
<input type="checkbox"/>	8-8. Large cores in competent, covered containers or under roof on impervious surface.	<input type="checkbox"/>	Roof and pervious surface or outdoors in uncovered, competent <input checked="" type="checkbox"/>	Stored outdoors on pervious surface with no weather-proof <input type="checkbox"/>	1
<input type="checkbox"/>	8-9. Engines and transmissions are removed before crushing/dropping roofs on site.	<input type="checkbox"/>	Some engines/trans crushed in vehicles (<20%) <input checked="" type="checkbox"/>	Engines/trans left in vehicles when crushing <input type="checkbox"/>	1
<input checked="" type="checkbox"/>	8-10. Crusher (owned/leased) inside building or under roof on impervious surface.	<input type="checkbox"/>	Outdoors on impervious surface <input type="checkbox"/>	Outdoors on pervious surface <input type="checkbox"/>	2
<input checked="" type="checkbox"/>	8-11. Crusher area(s) free of spills and leaks.	<input type="checkbox"/>	No spills and only a few leaks on ground <input type="checkbox"/>	Multiple spills and leaks on ground <input type="checkbox"/>	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>				87.50%	21
N/A	Section 9. Mercury Management				
<input type="checkbox"/>	9-1. All Mercury switches removed prior to storage on yard.	<input checked="" type="checkbox"/>	Some not removed/not stored in collection bucket <input type="checkbox"/>	No switches removed <input type="checkbox"/>	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 <input type="checkbox"/>	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 <input type="checkbox"/>		2
<input type="checkbox"/>	9-4. Mercury container labeled "Universal Waste" and accumulation start date indicated.	<input checked="" type="checkbox"/>	Not properly labeled <input type="checkbox"/>		2
<input type="checkbox"/>	9-5. Employees receive annual Mercury safety training.	<input checked="" type="checkbox"/>	Not trained or not properly documented <input type="checkbox"/>		2
<input type="checkbox"/>	9-6. Mercury spill kit is readily accessible in dismantling area.	<input checked="" type="checkbox"/>	Not in dismantling area <input type="checkbox"/>	No Mercury spill kit <input type="checkbox"/>	2
<b>Section 9. Percentage/Subtotal (12 points possible)</b>				100.00%	12

N/A	Section 10. Waste Tire Management						
<input type="checkbox"/>	10-1. Facility has waste tire storage <250 outside or <1,300 inside.	<input checked="" type="checkbox"/>	More than 1,300 tires stored inside	<input type="checkbox"/>	More than 250 tires stored outside	<input type="checkbox"/>	2
<input type="checkbox"/>	10-2. Waste tires stored in a manner that prevents water accumulation/weed growth.	<input checked="" type="checkbox"/>	Tires allowing weed growth	<input type="checkbox"/>	Tires accumulating water	<input type="checkbox"/>	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		<input type="checkbox"/>	2	
<input type="checkbox"/>	10-4. If >50 used tires on Site and/or any retail tires available for sale, one-time Used Tire Notification sent to IEPA.	<input checked="" type="checkbox"/>	Not completed/submitted		<input type="checkbox"/>	2	
<input type="checkbox"/>	10-5. If facility is a Tire Storage Site, annual Used Tire Notification and Registration Form completed and submitted to IEPA.	<input checked="" type="checkbox"/>	Overdue	<input type="checkbox"/>	Not completed/submitted	<input type="checkbox"/>	2
<input type="checkbox"/>	10-6. \$2.50/tire IDR fee collected for each new/used tire sold; fee listed as distinct separate item from tire selling price.	<input checked="" type="checkbox"/>	\$2.50 fee not listed separately on receipts/invoices	<input type="checkbox"/>	\$2.50 fee not collected	<input type="checkbox"/>	2
<input type="checkbox"/>	10-7. If new/used tires are sold, an equal number of used tires are accepted from the buyer for recycling.	<input checked="" type="checkbox"/>	Less than equal number accepted	<input type="checkbox"/>	None accepted	<input type="checkbox"/>	2
<input type="checkbox"/>	10-8. If new/used tires are sold, 8.5"x 11" recycling sign posted in accordance with IL state law.	<input checked="" type="checkbox"/>	Signage incomplete/too small	<input type="checkbox"/>	Signage not posted	<input type="checkbox"/>	2
<input type="checkbox"/>	10-9. If new/used tires are sold, facility does not allow used tires to accumulate for >90 days.	<input checked="" type="checkbox"/>	Used tires accumulate for >90 days		<input type="checkbox"/>	2	
Section 10. Percentage/Subtotal (18 points possible)					100.00%	18	
N/A	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	<input type="checkbox"/>	2
<input type="checkbox"/>	11-2. Lead acid batteries stored inside covered storage area with impervious surface.	<input checked="" type="checkbox"/>	Covered storage area absent or no impervious surface	<input type="checkbox"/>	No cover, no impervious surface	<input type="checkbox"/>	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"/>	Stored unsafely	<input type="checkbox"/>	2
<input type="checkbox"/>	11-4. If new/used lead acid batteries are sold, an equal number of used lead acid batteries are accepted from the buyer for recycling.	<input checked="" type="checkbox"/>	Less than equal number accepted	<input type="checkbox"/>	None accepted	<input type="checkbox"/>	2
<input type="checkbox"/>	11-5. If new/used lead acid batteries are sold, 8.5"x 11" recycling sign posted in accordance with IL state law.	<input checked="" type="checkbox"/>	Signage incomplete/too small	<input type="checkbox"/>	Signage not posted	<input type="checkbox"/>	2
Section 11. Percentage/Subtotal (10 points possible)					100.00%	10	
N/A	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	<input type="checkbox"/>	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	<input type="checkbox"/>	2
<input checked="" type="checkbox"/>	12-3. Refrigerants collected and stored in EPA approved devices.	<input type="checkbox"/>	Devices not EPA approved/refrigerants released into atmosphere		<input type="checkbox"/>	2	
Section 12. Subtotal/Percentage (6 points possible)					100.00%	6	

<b>IL Green CAR Audit Grand Total (210)</b>		94.76%	199
<b>Highlights</b>			
Disposal records were perfect!!			
Safety training and environmental inspections were up to date and perfect!!			
Staff was very helpful and pleasant to be around!			
Tour given by Andy was awesome!!			
<b>Comments</b>			
2-7 Mercury switch annual report not submitted - ensure mercury switch annual reports submitted on time 2-12 No LOTO inspections - ensure LOTO inspections are completed annually for applicable equipment 6-5 A few leaks where fluids storage containers held - fix leaks, clean up spills on occurrence and prevent 7-1 A few leaks in fluids removal areas - fix leaks, clean up spills on occurrence and prevent 7-7 A few leaks in large core storage area - fix leaks, clean up spills on occurrence and prevent 7-8 A few leaks in salvage vehicle storage area - fix leaks, clean up spills on occurrence and prevent 8-3 Designated fluid removal area is uncovered, impervious surface - cover area or relocate to covered, impervious surface 8-8 Large cores stored on uncovered, impervious surface - provide cover, enclosed containers, or relocate to covered, impervious area 8-9 Engines/transmissions left in <20% of vehicles when crushing - remove engines/transmissions from vehicles prior to crushing			
<b>Compliance with IL Green CAR Standards Verified</b>			
<b>Signature</b>	<b>Medal Awarded</b>	<b>Date</b>	
<b>IL Green CAR Environmental Manager Verification</b>			
Signature:		Date:	