

From: [Elizabeth Wallace](#)
To: [IDEM WWWiolationresponse](#)
Cc: [Kent Robinson](#)
Subject: IN0064751 - JB's Salvage and West Side Auto Parts Inspection Response
Date: Friday, June 21, 2024 2:20:47 PM
Attachments: [image001.png](#)
[6-21-24 Noncompliance Response.pdf](#)

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Hello,

VET Environmental Engineering, LLC (VET) was retained by JB's Salvage and West Side Auto Parts (JB's) to respond to the Noncompliance Letter issued by the Indiana Department of Environmental Management (IDEM) on May 29, 2024. Attached please find JB's full response. If you have any questions or concerns, please do not hesitate to contact VET at (812) 822-0400.

Thank you – have a nice day!

Respectfully,

Elizabeth Wallace, MS, MPA
Senior Project Manager
Environmental Scientist

 2335 WEST FOUNTAIN DRIVE
BLOOMINGTON, IN 47404
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June 21, 2024

Indiana Department of Environmental Management
Office of Water Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

To whom it may concern,

**RE: JB's Salvage, Inc. – Bloomington, Indiana
Noncompliance Letter Response**

VET Environmental Engineering, LLC (VET) was retained by JB's Salvage and West Side Auto Parts (JB's) to assist with compliance tasks associated with the facility's National Pollutant Discharge Elimination System (NPDES) permit. JB's is located at 1803 West Fountain Drive, Bloomington, Monroe County, Indiana (Site). The Site's NPDES permit number is IN0064751.

The Indiana Department of Environmental Management (IDEM) conducted an inspection at the Site on May 16, 2024. This response is necessitated by IDEM's issuance of a Noncompliance Letter dated May 29, 2024. Below are the items necessitating response and JB's completed or intended actions.

- 1. In reviewing the December 2023 Quarterly NetDMR submittal, it was determined that the daily maximum and daily minimum results for Aluminum, Zinc, Copper, Iron, and COD were recorded wrong on the Discharge Monitoring Report (DMR). The facility must correct and resubmit this report in NetDMR.*

Response: VET resubmitted the Quarterly NetDMR for Outfall 001 to reflect accurate daily minimums and maximums. Outfall 003 did not discharge during the October – December 2023 monitoring period. As such, the NetDMR for Outfall 003 was not resubmitted. A copy of the resubmitted Quarterly NetDMR for Outfall 001 is included as **Attachment 1**.

- 2. The number of exceedances (#of Ex.) column in NetDMR was not filled out. A correct accounting of exceedances can be found under the Effluent Limits Compliance portion of this report. Also, causes of exceedances and any mitigation steps taken should be explained in the "Comments" box on the DMR. Please ensure that future reports contain this information.*

"Compliance that makes sense."

Response: The number of exceedances column and “comments” box in NetDMR were appropriately completed for JB’s April 2024 NetDMR submissions for Outfalls 001 and 003. VET will ensure NetDMRs continue to be completed as specified in this letter moving forward. JB’s April 2024 NetDMR submissions are included as **Attachment 2**.

3. *The Effluent Limit Conditions area was rated unsatisfactory due to the following self-reported violations of the limits detailed in Part I.A. of the NPDES permit.*

<i>Month</i>	<i>Year</i>	<i>Outfall</i>	<i>Parameter</i>	<i>Number</i>
<i>November</i>	<i>2023</i>	<i>001</i>	<i>TSS</i>	<i>2</i>
<i>January</i>	<i>2024</i>	<i>003</i>	<i>TSS</i>	<i>2</i>
<i>January</i>	<i>2024</i>	<i>001</i>	<i>TSS</i>	<i>2</i>

It is noted that there was only six months of records reviewed, because the last reconnaissance inspection included a 12-month records review from October 2022 to September 2023.

Response: JB’s submitted Additional Action Plans (AAP) on February 22, 2024 and May 14, 2024 to address effluent limitation exceedances reported in NetDMR. As of the date of this letter, JB’s has completed all corrective action detailed in the AAPs. VET successfully collected storm water samples, subsequent to the completed corrective action, at Outfalls 001 and 003 on May 14, 2024 and May 15, 2024, respectively. Analytical results for Outfalls 001 and 003 were below the facility’s effluent limitations at concentrations of <5.0 milligrams per liter (mg/L) and 15 mg/L, respectively. These results demonstrate that JB’s completed corrective actions are successfully trapping sediment prior to discharge and lowering the facility’s results for Total Suspended Solids (TSS).

If you have any questions or comments regarding this document, please contact VET at (812) 822-0400.

Respectfully submitted,



Elizabeth K. Wallace, MS, MPA
Senior Project Manager

ATTACHMENT 1

[✔ View Certification](#) | [📄 Download COR](#)

DMR Copy of Submission

Form Approved OMB No. 2040-0004 expires on 07/31/2026

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Showing COR 1 of 2 [◀](#) [1](#) [2](#) [▶](#)

Submission Note

If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

Edit Check Errors

No errors.

Comments

Maximum for AI = 0.68 mg/L

Attachments

Name	Type	Size
IN0064751_001A_MMR_2023_12.pdf	pdf	123804.0
IN0064751_001A_MMR_2023_10.pdf	pdf	138981.0
IN0064751_001A_MMR_2023_11.pdf	pdf	184284.0

Report Last Saved By

JB SALVAGE INC & WEST SIDE AUTO PARTS

User: SARA@VET-ENV.COM
Name: Sara Hamidovic
E-Mail: sara@vet-env.com
Date/Time: 2024-06-21 09:39 (Time Zone:-04:00)

Report Last Signed By

User: SARA@VET-ENV.COM
Name: Sara Hamidovic
E-Mail: sara@vet-env.com
Date/Time: 2024-06-21 09:39 (Time Zone:-04:00)

ATTACHMENT 2

[✔ View Certification](#) | [📄 Download COR](#)

DMR Copy of Submission

Form Approved OMB No. 2040-0004 expires on 07/31/2026

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Submission Note

If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

Edit Check Errors

Parameter		Monitoring Location	Field	Type	Description	Acknowledge
Code	Name					
00530	Solids, total suspended	1 - Effluent Gross	Quality or Concentration Sample Value 2	Soft	The provided sample value is outside the permit limit. Please verify that the value you have provided is correct.	<input checked="" type="checkbox"/>

Comments

VET submitted an Additional Action Plan (AAP) to IDEM via email on May 14, 2024 addressing planned and initiated corrective actions to address the effluent limitation exceedances for April 2024 at Outfalls 001 and 003. Corrective actions include removing and replacing straw bales, expanding the existing swale at Outfall 001, and installing a rock filter berm at Outfall 003. Additional details are documented in the AAP submitted to IDEM.

Attachments

Name	Type	Size
IN0064751_001A_MMR_2024_04.pdf	pdf	287238.0

Report Last Saved By**JB SALVAGE INC & WEST SIDE AUTO PARTS**

User: SARA@VET-ENV.COM
 Name: Sara Hamidovic
 E-Mail: sara@vet-env.com
 Date/Time: 2024-05-27 22:53 (Time Zone:-04:00)

Report Last Signed By

User: SARA@VET-ENV.COM
 Name: Sara Hamidovic
 E-Mail: sara@vet-env.com
 Date/Time: 2024-05-27 22:53 (Time Zone:-04:00)

[✔ View Certification](#) | [📄 Download COR](#)

DMR Copy of Submission

Form Approved OMB No. 2040-0004 expires on 07/31/2026

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Submission Note

If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

Edit Check Errors

Parameter		Monitoring Location	Field	Type	Description	Acknowledge
Code	Name					
00530	Solids, total suspended	1 - Effluent Gross	Quality or Concentration Sample Value 3	Soft	The provided sample value is outside the permit limit. Please verify that the value you have provided is correct.	<input checked="" type="checkbox"/>
00530	Solids, total suspended	1 - Effluent Gross	Quality or Concentration Sample Value 2	Soft	The provided sample value is outside the permit limit. Please verify that the value you have provided is correct.	<input checked="" type="checkbox"/>

Comments

VET submitted an Additional Action Plan (AAP) to IDEM via email on May 14, 2024 addressing planned and initiated corrective actions to address the effluent limitation exceedances for April 2024 at Outfalls 001 and 003. Corrective actions include removing and replacing straw bales, expanding the existing swale at Outfall 001, and installing a rock filter berm at Outfall 003. Additional details are documented in the AAP submitted to IDEM.

Attachments

Name	Type	Size
IN0064751_003A_MMR_2024_04.pdf	pdf	312900.0

Report Last Saved By**JB SALVAGE INC & WEST SIDE AUTO PARTS**

User: SARA@VET-ENV.COM
 Name: Sara Hamidovic
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 Date/Time: 2024-05-27 22:53 (Time Zone:-04:00)

Report Last Signed By

User: SARA@VET-ENV.COM
 Name: Sara Hamidovic
 E-Mail: sara@vet-env.com
 Date/Time: 2024-05-27 22:53 (Time Zone:-04:00)