

INDUSTRIAL ACTIVITIES STORMWATER POLLUTION PREVENTION PLAN (SWPPP)

For

LKQ 1711 - Lakenor Auto & Truck Salvage, Inc.

11200 Alden Road

Adelanto, CA 92301



Waste Discharger Identification (WDID)

6B36I025414

Compliance Group Name

LKQ Corporation

Exceedance Response Action (ERA) Status

Level 1 – Aluminum, Copper, Iron, Lead, Total Suspended Solids, & Zinc

Legally Responsible Person (LRP)

LKQ of Southern California

Nicky Castillo

11200 Alden Road

Adelanto, CA 92301

209-345-0204

SWPPP Prepared by:

Apex Companies, LLC

5355 Avenida Encinas, Suite 107

Carlsbad, CA 92008

SWPPP Amended Date

June 24, 2024

Certification and Signature

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified employees properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted, to the best of my knowledge and belief, is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Legally Responsible Party (LRP)

Nicky Castillo, Plant Manager

Full Name, Job Title

Signature

Date

SWPPP Checklist

The facility will revise the SWPPP as necessary, including but not limited to when there are changes in facility contacts or Pollution Prevention Team (PPT) members, changes or addition of Best Management Practices (BMPs), or changes in or addition of industrial activities that impact stormwater discharge.

SWPPP Requirement (IGP Section Reference)	Not Applicable	Page Number / Section Reference	Date Implement ed or Last Revised
General			
Signed Certification (Section II.A)		i	June 2024
Pollution Prevention Team (Section X.D.1)		3 / §1.5	September 2023
Existing Facility Plans (Section X.D.2)		4 / §1.6	June 2024
Site Map(s) (Section X.E)			
Facility Boundaries (Section X.E.3.a)		App. A	June 2024
Drainage Areas (Section X.E.3.a)		App. A	December 2020
Direction of Flow (Section X.E.3.a)		App. A	December 2020
On-Facility Water Bodies (Section X.E.3.a)	X	N/A	N/A
Areas of Soil Erosion (Section X.E.3.a)		App. A	December 2020
Nearby Water Bodies (Section X.E.3.a)		App. A	December 2020
Municipal Storm Drain Inlets (Section X.E.3.a)	X	N/A	N/A
Points of Discharge (Section X.E.3.b)		App. A	December 2020
Sampling Locations (Section X.E.3.b)		App. A	December 2020
Structural Control Measures (Section X.E.3.c)		App. A	December 2020
Impervious Areas (Section X.E.3.d)		App. A	December 2020
Location of Directly Exposed Materials (Section X.E.3.e)		App. A	December 2020

SWPPP Requirement (IGP Section Reference)	Not Applicable	Page Number / Section Reference	Date Implement ed or Last Revised
Locations of Significant Spills and Leaks (Section X.E.3.e)	X	N/A	N/A
Areas of Industrial Activity (Section X.E.3.f)		App. A	December 2020
Storage Areas/Storage Tanks (Section X.E.3.f)		App. A	June 2024
Shipping and Receiving Areas (Section X.E.3.f)		App. A	December 2020
Fueling Areas (Section X.E.3.f)		App. A	December 2020
Vehicle Equipment Storage & Maintenance (Section X.E.3.f)		App. A	December 2020
Material Handling / Processing (Section X.E.3.f)		App. A	December 2020
Waste Treatment / Disposal (Section X.E.3.f)	X	N/A	N/A
Dust or Particulate Generations (Section X.E.3.f)		App. A	December 2020
Cleaning and Material Use (Section X.E.3.f)		App. A	December 2020
Other Areas of Industrial Use (Section X.E.3.f)		App. A	December 2020
List of Industrial Materials (Section X.F)			
Storage Location		5 / Table 2-1	June 2024
Quantity		5 / Table 2-1	June 2024
Frequency		5 / Table 2-1	June 2024
Receiving and Shipping Location		5 / Table 2-1	June 2024
Quantity		5 / Table 2-1	June 2024
Frequency		5 / Table 2-1	June 2024
Handling Location		5 / Table 2-1	June 2024

SWPPP Requirement (IGP Section Reference)	Not Applicable	Page Number / Section Reference	Date Implement ed or Last Revised
Quantity		5 / Table 2-1	June 2024
Frequency		5 / Table 2-1	June 2024
Potential Pollution Sources (Section X.G)			
Description of Potential Pollution Sources (Section X.G.1)			
Industrial Processes (Section X.G.1.a)		5 / Table 2-1	June 2024
Material Handling and Storage Areas (Section X.G.1.b)		5 / Table 2-1	June 2024
Dust and Particulate Generating Activities (Section X.G.1.c)		6 / §2.2	June 2015
Significant Spills and Leaks (Section X.G.1.d)	X	9 / §2.4	June 2015
Non-Stormwater Discharges (Section X.G.1.e)		9 / §2.5	June 2015
Erodible Surfaces (Section X.G.1.f)		10 / §2.6	June 2024
Assessment of Potential Pollutant Sources (Section X.G.2)			
Narrative Assessment of Likely Sources of Pollutants (Section X.G.2.a)		7 / Table 2-2	June 2024
Narrative Assessment Likely Pollutants Present in Stormwater Discharges (Section X.G.2.a)		7 / Table 2-2	June 2024
Identification of Additional BMPs (Section X.G.2.a)		16 / §3.2.4	June 2015
Identification of Drainage Areas with No Exposure (Section X.G.2.c)	X	3 / §1.4	June 2015
Identification of Additional Parameters (Section X.G.2.d)		8 / Table 2-2	June 2024
Stormwater BMPs (Section X.H)			
Minimum BMPs (Section X.H.1)			
Good Housekeeping (Section X.H.1.a)		11 / §3.1.1	December 2020

SWPPP Requirement (IGP Section Reference)	Not Applicable	Page Number / Section Reference	Date Implement ed or Last Revised
Preventative Maintenance (Section X.H.1.b)		11 / §3.1.2	June 2015
Spill Response (Section X.H.1.c)		12 / §3.1.3	December 2020
Material Handling and Waste (Section X.H.1.d)		12 / §3.1.4	June 2015
Erosion and Sediment Controls (Section X.H.1.e)		13 / §3.1.5	June 2015
Employee Training Program (Section X.H.1.f)		13 / §3.1.6	June 2015
Quality Assurance and Record Keeping (Section X.H.1.g)		14 / §3.1.7	June 2015
Advanced BMPs (Section X.H.2)			
Implement Advanced BMPs (Section X.H.2.a)		15 / §3.2	June 2015
Exposure Minimization BMPs (Section X.H.2.a.i)		15 / §3.2.1	December 2020
Stormwater Containment and Discharge Reduction BMPs (Section X.H.2.a.ii)		16 / §3.2.2	June 2015
Treatment Control BMPs (Section X.H.2.a.iii)	X	16 / §3.2.3	June 2015
Other Advanced BMPs (Section X.H.2.a.iv)		16/ §3.2.4	June 2015
Temporary Suspension of Activities (Section X.H.3)			
BMPs Necessary for Stabilization of Facility (Section X.H.3)	X	/ §4.4.4	June 2015
BMP Descriptions and Summary (Sections X.H.4 and X.H.5)			
Pollutant that the BMP Reduces or Prevents (Section X.H.4.a.i)		16 / Table 3-2	Feb 2017
Frequency of BMP Implementation (Section X.H.4.a.ii)		18 / Table 3-4	December 2020
Location of BMP (Section X.H.4.a.iii)		18 / Table 3-4	December 2020
Person Implementing BMP (Section X.H.4.a.iv)		18 / Table 3-4	December 2020

SWPPP Requirement (IGP Section Reference)	Not Applicable	Page Number / Section Reference	Date Implement ed or Last Revised
Procedures / Maintenance / Instructions for BMP Implementation (Section X.H.4.a.v)		18 / Table 3-4	December 2020
Equipment and Tools for BMP Implementation (Section X.H.4.a.vi)		18 / Table 3-4	December 2020
BMPs Needing More Frequent Inspections (Section X.H.4.a.vii)	X	18 / Table 3-4	June 2024
Minimum BMP / Applicable Advanced BMPs Not Implemented at the Facility (Section X.H.4.b)	X	N/A	N/A
BMPs Implemented in Lieu of Minimum or Applicable Advanced BMPs (Section X.H.4.c)	X	N/A	N/A
BMP Summary Table (Section X.H.5)		18 / Table 3-4	June 2024
Monitoring Implementation Plan (Section X.I)			
Team Members Assisting in Developing the MIP (Section X.I.1)		25 / §4.2	June 2015
Summary of Visual Observation Procedures, Locations, and Details (Section X.I.2)		26 / §4.3	June 2015
Justifications, if applicable, for: Alternative Discharge Locations, Representative Sampling Reduction or Qualified Combined Samples (Section X.I.3)	X	28 / §4.4	June 2015
Procedures for Field Instrument Calibration (Section X.I.4)		28 / §4.4	June 2015
Examples of Chain-Of-Custody Record (Section X.I.5)		App. C	June 2024
Annual Comprehensive Facility Compliance Evaluation (Section XV)			
Review of all Visual Inspection and Monitoring Records and Sampling and Analysis Results Conducted During the Previous Reporting Year (Section XV.A)		30 / §4.5	June 2015
Visual Inspection of All Areas of Industrial Activity and Associated Potential Pollutant Sources (Section XV.B)		30 / §4.5	June 2015
Visual Inspection of All Drainage Areas Previously Identified As Having No-Exposure to Industrial Activities and Materials in Accordance with the Definitions in Section XVII (Section XV.C)		30 / §4.5	June 2015
Visual Inspection of Equipment Needed to Implement the BMPs (Section XV.D)		30 / §4.5	June 2015
Visual Inspection of Any Structural and/or Treatment Control BMPs (Section XV.E)		30 / §4.5	June 2015

SWPPP Requirement (IGP Section Reference)	Not Applicable	Page Number / Section Reference	Date Implement ed or Last Revised
Review and Assessment of All BMPs for Each Area of Industrial Activity and Associated Potential Pollutant Sources (Section XV.F)		30 / §4.5	June 2015
Assessment of Other Factors Needed to Complete the Information Described in Section XVI.B (Section XV.G)		30 / §4.5	June 2015

Schedule of Key SWPPP Elements

Event	Frequency	Key Factors
Visual Observations – refer to the MIP in Section 4.0		
Monthly Visual Observations	Once per calendar month (monthly)	Conducted during daylight hours of scheduled facility operating hours and on days <u>without precipitation</u>
Sampling Event Visual Observation for Compliance Group	1 QSE during 1st half of reporting year 1 QSE during 2nd half of reporting year	Conducted at the same time sampling occurs at a discharge location
Sampling & Analysis – refer to the MIP in Section 4.0		
Stormwater Samples for Compliance Group	1 QSE during 1st half of reporting year 1 QSE during 2nd half of reporting year	- Within 4 hours of the start of a QSE, or at the start of facility operations if the QSE occurs within the previous 12-hour period. - Minimum of one sample from each drainage area at all discharge locations
Evaluations / Revisions / Reporting refer to the MIP in Section 4.0		
Annual Evaluation	No less than 8 months and no more than 16 months after previous	- A review of all sampling events, visual observation and inspection records - An inspection of all industrial activity and potential pollutant sources for evidence of pollutants entering the stormwater - An inspection of all drainage areas previously identified as no exposure - An inspection of equipment needed to implement the BMPs - An inspection of all BMPs - A review and effectiveness assessment of all BMPs - An assessment of any other factors needed to comply with the requirements of Section XVI.B of the IGP
Annual Report	No later than July 15 th for previous reporting year	- Compliance Checklist - An explanation for any non-compliance - An identification of all revisions made to the SWPPP - The date of the Annual Evaluation

SWPPP Revision Log

Revision No.	Date	Revised By	Reason for Amendment	Sections Revised
1	2-7-2017	Apex	Updated sampling parameters.	Table 2-2, 3-2, 3-4, and 4-2
2	12-11-2020	Apex	Updated to reflect current site conditions and personnel.	Sections 1.0-3.0; Appendix A Figures
3	9-29-2023	Apex	Updated to reflect current LRP and PPT, and industrial material quantities kept onsite.	Cover, Page i, Section 1.5, Table 2-1, Table 2-2, Table 3-1, Appendix A Figure 2
4	6-24-2024	Apex	Updated to reflect current facility boundaries due to site expansion and industrial material quantities kept onsite.	Cover, Page i, Sections 1.1, 1.3, 2.6, and 3.4 Tables 1-1, 2-1, 2-2, and 3-4 Appendix A Figure 2 Appendix C Appendix E

Table of Contents

1.0	Facility Description and Contact Information	1
1.1	Facility Information	1
1.2	Facility Operations	1
1.3	Facility Layout and Conditions	2
1.4	Stormwater Drainage and Discharge Information	2
1.5	Facility Contacts and Responsible Parties	3
1.6	Existing Facility Plans	4
2.0	Potential Pollutant Sources	5
2.1	Significant Materials and Associated Industrial Activity	5
2.2	Dust and Particulate-Generating Activities	7
2.3	Potential Spills and Leaks	7
2.4	History of Spills and Leaks	9
2.5	Non-Stormwater Discharges (NSWDs)	9
2.6	Erodible Surfaces	10
3.0	Best Management Practices (BMPs)	11
3.1	Minimum BMPs	11
3.1.1	Good Housekeeping	11
3.1.2	Preventative Maintenance	11
3.1.3	Spill and Leak Prevention and Response	12
3.1.4	Material Handling and Waste Management	12
3.1.5	Erosion and Sediment Control	13
3.1.6	Employee Training	13
3.1.7	Quality Assurance and Recordkeeping	14
3.2	Advanced BMPs	15
3.2.1	Exposure Minimization	15
3.2.2	Stormwater Containment and Discharge Reduction	16
3.2.3	Treatment Control	16
3.2.4	Other Advanced BMPs	16
3.3	Summary of BMPs	17
3.4	Planned Improvements	24
4.0	Monitoring and Implementation Plan (MIP)	25
4.1	Discharge Locations and / or Outfalls	25
4.2	Pollution Prevention Team Members	25
4.3	Monitoring	26

4.3.1	Monthly Visual Observations.....	26
4.3.2	Sampling Event Visual Observations	27
4.3.3	Visual Observation Records.....	28
4.4	Stormwater Sampling and Analysis	28
4.4.1	Alternative Discharge Locations.....	30
4.4.2	Representative Sampling Reduction.....	30
4.4.3	Qualified Combined Samples.....	30
4.4.4	Temporary Suspension of Activities.....	30
4.5	Annual Comprehensive Facility Compliance Evaluation	31
4.6	Annual Report	31

Tables

1-1	Drainage Areas
2-1	Significant Materials and Associate Industrial Activity
2-2	Potential Spills and Leaks
2-3	History of Spills and Leaks
3-1	Exposure Minimization BMPs
3-2	Stormwater Containment and Discharge Reduction BMPs
3-3	Treatment Control BMPs
3-4	Summary of BMPs
4-1	Discharge / Outfall Locations
4-2	Sampling and Analysis Parameters

Appendices

A	Figures
B	Visual Observations Forms and Annual Comprehensive Facility Compliance Evaluation Form
C	Chain-of-Custody Record Example
D	Stormwater Training Records
E	Exceedance Response Action (ERA) Reports

1.0 Facility Description and Contact Information

1.1 Facility Information

Name of Facility: LKQ Lakenor Auto & Truck Salvage, Inc.

Street Address: 11200 Alden Road

City, State Zip: Adelanto, CA 92301

County: San Bernardino

WDID: 6B36I025414

Approximate Size (Acres): 85

Latitude: 34°37'16.52"N

Longitude: 117°25'11.62"W

Source for Lat. & Long: Google Earth Pro (version 7.1.4.1529)

Located in Indian Country: Yes _____ No X _____

If yes – name of reservation: N/A

Federal Facility: Yes _____ No X _____

A copy of a general site location map is included as **Appendix A, Figure 1**.

1.2 Facility Operations

Primary SIC Code: 5015

SIC Code Description: Motor Vehicle Parts, Used

Description of Operations: Operates primarily as an automotive dismantling, storage, and used parts retailer.
Operations include dismantling automobiles, washing and storing of used automobile parts for both retail and scrap

Normal Business Hours: 8:00 a.m. to 5:00 p.m. / Monday – Friday

Closed Holidays: New Year's Day, Memorial Day, Labor Day, Independence Day, Thanksgiving Day, and Christmas Day

1.3 Facility Layout and Conditions

Description of Buildings:	Office – approx. 5,859 SF Shipping/Dismantling Area – approx. 31,362 SF
Description of Vegetated Areas:	Retention Pond – approx. 3,117 SF
Description of Erodible Areas:	Vehicle Storage Yards, Parts Storage Racks, Employee Parking, and Retention Pond – approx. 3,612,131 SF
Description of Impervious Areas:	Office, Shipping/Dismantling Area, Loading Dock, Hazardous Waste Accumulation Area, and Tire Dismantling Area – approx. 89,632 SF
Acres of Developed Area:	Approximately 85
Acres of Dev. Area Exposed to Precipitation / Runoff:	Approximately 84.1
Describe Known or Potential Sources of Contamination:	None

A site diagram depicting the general layout of the facility that identifies approximate facility boundaries, buildings, locations of industrial activity subject to the IGP, locations of materials directly exposed to precipitation, storage areas and storage tank locations, fueling areas, vehicle and equipment maintenance and storage areas, material handling and processing areas, waste accumulation areas, vegetated areas, erodible areas, impervious areas, dust-generating areas, cleaning areas, areas of known or suspected contamination, stormwater flow, drainage areas, stormwater discharge locations or outfalls, areas of run-on, on-site and nearby surface water bodies, locations of municipal storm drain inlets, locations of stormwater collection and conveyance systems and associated flows of direction and points of discharge or outfalls, and stormwater monitoring and sampling locations is included as **Appendix A, Figure 2**.

1.4 Stormwater Drainage and Discharge Information

General Topography of Facility:	Relatively flat, 1% slope towards the northwest
General Surface Flow Direction:	Northwest
Stormwater Conveyance:	Surface runoff
Discharge Location:	Outfall 1 located in the northwestern corner of the facility
Discharge to MS4:	Yes <u>X (indirect)</u> No <u> </u>
If Yes – name of MS4 Operator:	Mojave River Watershed Group

Drainage to any segment of an impaired water: Yes _____ No X

If yes – name (and segment) of impaired water: N/A

If yes - pollutants of Impairment and indicate if pollutant is part of facility discharge: N/A

Specify which pollutants have a completed TMDL: N/A

Is there Run-On from Off-Site: Yes _____ No X

If yes – indicate & describe source: _____ Point Source
_____ Water body
_____ Runoff

The **Table 1-1** below identifies each of the drainage areas.

Table 1-1 Drainage Areas				
Drainage Area ID	Runoff Source Area	Includes Industrial Activity (Yes/No)	Approximate Square Footage	% of Total Facility
Drainage Area 1	Parts storage racks, shipping/dismantling area, retention pond, fueling area, hazardous waste accumulation area, loading dock, tire dismantling area, parts washer area, wastewater treatment system, and vehicle storage yards.	Yes	3,703,607	100

The following list identifies the drainage areas at the facility that have no exposure to industrial activities or materials:

- None

1.5 Facility Contacts and Responsible Parties

The members of the Pollution Prevention Team are identified below:

PPT Leader: Nicky Castillo
Plant Manager
209-345-0204

- Oversees implementation of the SWPPP and delegates the responsibilities of SWPPP.
- Ensures that the SWPPP is kept up to date.

		• Ensures that the training and monitoring are performed in accordance with the SWPPP.
PPT Sampler & Inspector:	Nicky Castillo Plant Manager 209-345-0204	• Monitoring weekly weather forecasts for storm events. • Performs monthly visual observation inspections as prescribed in the Monitoring Implementation Plan (MIP). • Conducts the sampling in accordance with the MIP. • Ensures samples are analyzed in accordance with the MIP. • Keeps the PPT Leader apprised of all monitoring and sampling & analysis events and corresponding results. • Coordinating with the PPT Alternate whenever he/she will need to the alternate to perform a required activity (e.g., visual observation or sampling event) during times such as vacation, illness, travel, or other absences or unavailability).
PPT Alternate:	Gabby Hernandez Office Administrator 562-298-5686	• Performing SWPPP-related responsibilities as assigned by the PPT Team Leader.
Qualified Industrial Stormwater Practitioner (QISP):	Timothy Klein Environmental Compliance Manager 858-997-4939	• Assistance with implementing the SWPPP, performing the Annual Comprehensive Facility Compliance Evaluation, assisting in the preparation of Annual Reports, performing ERAs, and training appropriate Pollution Prevention Team members.
Compliance Group Leader:	Timothy Klein Environmental Compliance Manager 858-997-4939	• Assist Compliance Group Participants with all compliance activities required by the IGP. • Prepare a Consolidated Level 1 and Level 2 ERA Reports for all Compliance Group Participants. • Inspect all facilities of in the Compliance Group Participants at a minimum of once per reporting year. • Entering required information into the California Water Boards Storm Water Multiple Application and Reporting Tracking System (SMARTS) in a timely manner as prescribed in the IGP.

1.6 Existing Facility Plans

The list below identifies other existing facility plans that include stormwater-related procedural and BMPs discussion:

- Spill Prevention, Control, and Countermeasure Plan (SPCC) dated July 28, 2015, amended October 10, 2019.

2.0 Potential Pollutant Sources

This section identifies all of the industrial materials and potential pollutant sources for the facility. It identifies specific pollutants associated with these sources and pollutant sources that are most susceptible to stormwater exposure, including a summary of significant spills and leaks that have occurred at the facility.

2.1 Significant Materials and Associated Industrial Activity

Table 2-1, below, identifies the industrial materials used in the various industrial activities that occur at the facility that could potentially contribute pollutants to stormwater runoff.

Table 2-1 Significant Materials and Associate Industrial Activity			
Significant Material	Associated Industrial Activity	Location(s)	Typical Quantity and Frequency
Diesel fuel (recovered)	Automobile dismantling Fluids draining Incoming / outgoing traffic Parts storage Parts washing Vehicle storage	Dismantling Area Hazardous Waste Accumulation Area Parts Storage Racks Parts Washer Area Vehicle Storage Yards & Roadways	Residuals / daily 550-gal AST / monthly
Gasoline (recovered)	Automobile dismantling Fluids draining Incoming / outgoing traffic Parts storage Parts washing Vehicle storage	Dismantling Area Hazardous Waste Accumulation Area Parts Storage Racks Parts Washer Area Vehicle Storage Yards & Roadways	Residuals / daily 550-gal AST / monthly 350-gal AST / monthly
Mercury switches	Automobile dismantling	Dismantling Area Hazardous Waste Accumulation Area	Small volume / As needed
Oil containing rags and absorbents	Automobile dismantling BMP absorbents Fluids draining Incoming / outgoing traffic Parts storage Parts washing Vehicle storage	Dismantling Area Hazardous Waste Accumulation Area Parts Storage Racks Parts Washer Area Shipping Area Vehicle Storage Yards & Roadways	Residuals / daily (3) 55-gal drums / monthly
Used battery acid	Battery removal Battery storage	Dismantling Area	Residuals / daily 120 batteries / monthly

Table 2-1 Significant Materials and Associate Industrial Activity			
Significant Material	Associated Industrial Activity	Location(s)	Typical Quantity and Frequency
Used oil	Automobile dismantling Fluids draining Incoming / outgoing traffic Parts storage Parts washing Vehicle storage	Dismantling Area Hazardous Waste Accumulation Area Parts Storage Racks Parts Washer Area Vehicle Storage Yards & Roadways	Residuals / daily 750-gal AST / monthly (3) 55-gal drums / monthly
Waste anti-freeze	Automobile dismantling Fluids draining Incoming / outgoing traffic Parts storage Parts washing Vehicle storage	Dismantling Area Hazardous Waste Accumulation Area Parts Storage Racks Parts Washer Area Vehicle Storage Yards & Roadways	Residuals / daily 550-gal AST / monthly
Hydraulic Oil	Automobile dismantling Fluids draining Incoming / outgoing traffic Parts storage Parts washing Vehicle storage	Hazardous Waste Accumulation Area	Residuals / daily (2) 55-gal drums / monthly
Motor Oil	Automobile dismantling Fluids draining Incoming / outgoing traffic Parts storage Parts washing Vehicle storage	Hazardous Waste Accumulation Area	Residuals / daily (3) 55-gal drums / monthly
Diesel Exhaust Fluid (DEF)	Automobile dismantling Fluids draining Incoming / outgoing traffic Parts washing Vehicle storage	Hazardous Waste Accumulation Area	Residuals / daily 275-gal tote / monthly
Degreaser	Parts washing	Parts Washer Area	Residuals / daily 275-gal tote / monthly
Waste windshield washer fluid	Automobile dismantling Fluids draining Incoming / outgoing traffic Parts storage Parts washing Vehicle storage	Dismantling Area Hazardous Waste Accumulation Area Parts Storage Racks Parts Washer Area Vehicle Storage Yards & Roadways	Residuals / daily 330-gal AST / monthly 55-gal drum / monthly
Oily water	Automobile dismantling Fluids draining Incoming / outgoing traffic Parts storage Parts washing Vehicle storage	Hazardous Waste Accumulation Area Parts Washer Area	Residuals / daily (4) 55-gal drums / monthly

2.2 Dust and Particulate-Generating Activities

The list below identifies the industrial activities at this facility that are known or suspected of generating dust and or particulates:

- Loading and unloading of vehicles and parts in gravel/dirt yards
- Weather-related impact to gravel/dirt yards and roadways

2.3 Potential Spills and Leaks

Table 2-2, below, identifies areas where the potential exists for spills and leaks or other pollutants to impact stormwater.

Table 2-2 Potential Spills and Leaks			
Location	Pollutant Sources	Potential Pollutants	Discharge Location / Outfall
Dismantling Area	• Spills and leaks • Track out	Oil and grease Iron Lead Aluminum TSS Copper	Drainage Area 1 / Outfall 1
The Dismantling Area is located in the southern portion of the facility. The dismantling area is where the facility disassembles vehicles into its various salvageable parts. Used batteries are also stored here until they are resold or properly recycled.			
Hazardous Waste Accumulation Area	• Spills and leaks from failures or overfills • Track out	Oil and grease	Drainage Area 1 / Outfall 1
The Hazardous Waste Accumulation Area is located south of the Dismantling Area. Hazardous waste accumulated in these areas include: a 550-gal diesel AST, a 750-gal used oil AST, a 550-gal gasoline AST, a 350-gal gasoline AST, a 550-gal waste antifreeze AST, a 330-gal windshield washer fluid AST, and various 55-gal drums containing used oil, motor oil, hydraulic oil, oily water, oily solids, wiper fluid, oily debris and rags, and DEF.			
Parts Storage Racks	• Spills and leaks • Track out	Oil and grease Iron Lead Aluminum TSS Copper	Drainage Area 1 / Outfall 1
The Parts Storage Racks are located in the southern portion of the facility. The Parts Storage Racks are used to store salvageable vehicle parts.			

Table 2-2 Potential Spills and Leaks			
Location	Pollutant Sources	Potential Pollutants	Discharge Location / Outfall
Parts Washer Area	• Pressure washing overspray • Track out • Spills and leaks	Oil and grease Iron Lead Aluminum TSS Copper Acid/base	Drainage Area 1 / Outfall 1
The Parts Washer Area is located in the western corner of the Dismantling Area. In the Parts Washer Area, the facility uses high pressure water and degreaser to wash salvageable parts before storage or resale. Wastewater generated during parts washing operations is collected in the in-ground sumps and directed to the treatment system which is ultimately directed to the sanity sewer system.			
Vehicle Storage Yards & Roadways	• Spills and leaks • Windblown • Loading and unloading • Track out	Oil and grease Iron Lead Aluminum TSS Copper	Drainage Area 1 / Outfall 1
The Vehicle Storage Yards, located in the central and northern portion of the facility, are accessible to facility employees and contracted service personnel only, and is accessed by interior dirt and gravel roadways. The Vehicle Storage Yards are used to store vehicles and salvageable parts.			
Loading Dock	• Spills and leaks • Track out • Loading and unloading	Oil and grease Iron Lead Aluminum TSS Copper	Drainage Area 1 / Outfall 1
The Loading Dock is located to the west of the Dismantling Area. Parts are loaded and unloaded in this area during shipping and receiving operations.			
Roll-Offs	• Spills and leaks • Loading and unloading	Oil and grease Iron Lead Aluminum TSS Copper	Drainage Area 1 / Outfall 1
The Roll-Offs are located north of the Dismantling Area. This is where scrap metals and pallets are accumulated until they are ready to be shipped out for recycling or disposal.			
Tire Accumulation Area	• Loading and unloading • Track out	Oil and grease TSS	Drainage Area 1 / Outfall 1
The Tire Accumulation Area is located in the southeast corner of the facility. Tires that are separated from their wheels are stored in this area. Tires that are in good condition can be purchased by customers. Tires that are not sold are transported offsite.			

Table 2-2 Potential Spills and Leaks			
Location	Pollutant Sources	Potential Pollutants	Discharge Location / Outfall
Fueling Area	- Spills and leaks - Vehicle fueling - Track out	Oil and grease Iron Lead Aluminum TSS Copper	Drainage Area 1 / Outfall 1
Vehicle fueling is conducted at the Hazardous Waste Accumulation Area near the 550-gallon gasoline AST. The fueling area is covered and underlain by concrete.			
Mobile Crusher	- Loading and unloading - Track out - Spills and leaks from crushing operations	Oil and grease Iron Lead Aluminum TSS Copper	Drainage Area 1 / Outfall 1
The mobile crusher is located in the Vehicle Storage Yard, wherever crushing operations are required. Vehicles that have been drained and salvaged are crushed prior to being shipped offsite.			
Note: According to the IGP, the facility is required to analyze stormwater samples for pH, TSS, O&G, iron, lead, and aluminum. Additionally, the site is sampling for copper and zinc.			

2.4 History of Spills and Leaks

Table 2-3, below, includes a summary of the spills and leaks that have occurred at the facility in the past 5 years.

Table 2-3 History of Spills and Leaks					
Date	Material	Description and Location of Spill or Leak	Total Quantity Spilled or Leaked	Quantity Discharged from Facility	Remaining Quantity with Potential for Discharge
No significant spill or leak of material has reportedly occurred at the facility since obtaining coverage under the general permit.					

2.5 Non-Stormwater Discharges (NSWDs)

Non-stormwater discharges (NSWDs) consist of discharges which do not originate from precipitation events. The IGP provides allowances for specified NSWDs provided they do not cause erosion, do not carry other pollutants, are not prohibited by the MS4, do not require a separate NPDES Permit from the Regional Water Quality Control Board, and are visually observed and reported in accordance with the Monitoring Implementation Plan (MIP). Examples of authorized NSWDs may include: fire prevention or response system flushing; atmospheric condensate from air-conditioning, refrigeration, or compressor

systems; irrigation drainage provided all pesticides and herbicides have been applied in accordance with the manufacturer's label; and uncontaminated natural springs, groundwater, and foundation and footage drainage.

NSWDs into storm drainage systems or waterways are prohibited unless they are authorized in the IGP, identified in the SWPPP, or authorized under a separate NPDES permit.

NSWDs that are authorized at this facility include the following:

- Air conditioner condensate
- Dust control water run-off

The following activities at this facility have the potential to result in unauthorized NSWDs:

- None

2.6 Erodible Surfaces

Approximately 97% of the facility consists of permeable surfaces with the potential to erode during heavy precipitation events. These areas in the Vehicle Storage Yards, Parts Storage Racks, Employee Parking, and Retention Pond consists primarily of dirt and gravel which totals approximately 82.9 acres.

3.0 Best Management Practices (BMPs)

3.1 Minimum BMPs

This section describes the minimum BMPs that facility implements.

3.1.1 Good Housekeeping

The facility routinely implements the following good housekeeping procedures to minimize pollutants in stormwater discharges from the facility.

- The facility observes all outdoors areas to clean up and properly dispose of debris, wastes, spilled or leaked materials, and tracked materials.
- Dust generation is minimized by with the use of a water truck spraying water in the unpaved areas throughout the facility two (2) times per week.
- Rinse or wash water is properly disposed and not permitted to enter the stormwater conveyance system.
- All stored industrial materials that be readily mobilized by contact with stormwater are covered with sturdy secured covers at all times except during filling or emptying, at the end of each work shift or prior to rain event.
- All stored non-solid industrial materials or wastes that can be transported or dispersed by wind or contact with stormwater are kept in closed containers such as tanks, totes, drums, and buckets.

3.1.2 Preventative Maintenance

The facility routinely implements the following preventative maintenance procedures to minimize pollutants in stormwater discharges from the facility.

- Equipment is serviced in accordance with the manufacturer recommendations.
- Equipment and systems used outdoors are checked on a regular basis to detect leaks or conditions that may result in the development of leaks.
- Equipment and systems are promptly repaired when conditions exist that may result in the development of leaks or spills.

3.1.3 Spill and Leak Prevention and Response

The facility maintains spill response kits in the Dismantling Area near the Hazardous Waste Accumulation Area.

The LKQ employees are trained on proper material handling, spill prevention, and spill response. Spills of hazardous materials are reported in accordance with Federal, State, and Local regulations. The facility utilizes the services of a HAZMAT contractor as required.

In the event of a spill, employees are instructed to immediately notify the appropriate supervisor or manager and perform the following activities:

- Identify the material and secure the area.
- Obtain personal protective equipment (PPE) and maintain safety of employees.
- Contain spilled or leaked material and cover floor and storm drains with portable dikes, absorbent socks, or other absorbent material.
- Remove soiled absorbent, clean up material, and package for disposal in accordance with environmental regulations.
- Clean up the area to the approval of the Plant Manager.
- Record the date, time, location, cause, quantity released, and quantity cleaned up in an incident report.
- Replace or clean any spill response equipment so that it will be ready for the next event.
- Notify the Plant Manager of the incident, who is responsible for determining the need for reporting to government agencies.

A spill that flows into a municipal storm drain is reportable in accordance with Federal, State, and Local regulations, refer to instructions on reporting material releases that pose a significant potential hazard to human health and safety, property, and / or the environment.

3.1.4 Material Handling and Waste Management

The facility routinely implements the following material handling and waste management procedures to minimize spills and exposure of pollutants stormwater discharges.

- The facility minimizes the handling of industrial materials and wastes that can be readily mobilized by contract with stormwater during a storm event.

- The facility manages all industrial materials or wastes that can be transported or dispersed by wind or contact with stormwater (e.g., particulates, paper) by keeping them in closed containers.
- The facility covers containers of industrial waste and industrial materials when not in use.
- The facility uses double-walled tanks and secondary containment spill pallets.
- Stormwater generated from within the facility is diverted away from stockpiled materials.
- Spills of industrial materials or wastes are cleaned in accordance with the spill response procedures (**Section 3.1.3**).
- Outdoor material or waste handling equipment is routinely observed to clean any that have been contaminated by contact with industrial materials or wastes.

3.1.5 Erosion and Sediment Control

The facility routinely implements the following erosion and sediment control procedures to minimize erosion.

- The facility minimizes excess runoff from hoses, irrigation lines, air conditioners, and other water domestic sources, and diverts any such discharges away from areas where pollutants are likely to accumulate.
- Soil erosion and sedimentation is controlled by covering roadways with gravel, asphalt, and/or concrete. The parts storage racks area and vehicle storage yards are covered with loose gravel.
- The entire facility perimeter is surrounded by corrugated metal sheeting that is buried approximately one foot deep in the soil to reduce the flow of stormwater and minimize erosion and sediment transport.

3.1.6 Employee Training

The facility has developed a training program to maintain employee awareness regarding stormwater pollution prevention practices. Key elements of the employee training include the following:

- Training schedules for employees handling industrial materials and wastes, at no less than annually and at immediately for new hires.
- Assignment of spill prevention and response responsibilities, as communicated through the Hazard Communication Training Program.
- Assignment of stormwater management roles and responsibilities.

- Training on the minimal BMPs – good housekeeping, preventative maintenance, spill prevention and response, hazardous material handling and storage, and erosion and sediment control.
- Identification of conditions that may potentially cause stormwater pollution.
- Any new employee whose work might impact stormwater completes SWPPP training.
- Heavy equipment operators receive additional training regarding proper machinery operation, fueling, and fuel station inspections.

3.1.7 Quality Assurance and Recordkeeping

The ongoing implementation, training, and recordkeeping requirements of this SWPPP are the responsibility of the Pollution Prevention Team (PPT) Leader, who may designate a qualified environmental consultant to review and update the SWPPP as needed.

The following reports and forms are utilized under this SWPPP to ensure proper recordkeeping:

- Employee training logs;
- Visual observation forms;
- Sample chain-of-custody records;
- Laboratory analytical reports;
- Spill or leak incident reports;
- Maintenance records;
- Annual comprehensive compliance inspection forms.

All records required as a part of this SWPPP and the Monitoring and Implementation Plan (MIP) will be retained as a part of this SWPPP for a minimum of 5 years from the date generated or date submitted, whichever is later.

3.2 Advanced BMPs

This section describes the advanced BMPs that facility implements.

3.2.1 Exposure Minimization

Stormwater shelters (e.g., awnings, canopies, roofed pavilions) are installed at the facility to prevent the contact of stormwater with industrial activities and materials. The locations of these shelters and associated industrial activities and materials are presented in **Table 3-1**.

Table 3-1 Exposure Minimization BMPs			
Shelter Description	Location	Associated Industrial Activity	Industrial Materials
Buildings	Office Shipping/Dismantling Area	Parts storage Used battery storage Automobile dismantling Fluids draining Parts washing Loading and unloading Welding Virgin and hazardous waste accumulation	Automobile parts Used batteries Gasoline (recovered) Hazardous materials Hazardous waste Mercury switches
Metal Awnings / Canopies	Hazardous Waste Accumulation Area Tire Dismantling Area	Virgin and hazardous waste accumulation	Gasoline (recovered) Windshield washer fluid Waste Coolant Used Oil Waste Antifreeze Hydraulic Oil Motor Oil DEF Degreaser Diesel Propane

The Vehicle Storage Yards occupy the approximate northern three-quarters of the facility and are used to store dismantled vehicles or vehicles to be dismantled. As part of standard procedure, fluids and batteries are removed prior to storing vehicles in the yards; however, the potential exists for residual amounts of fluids to remain in and on the vehicles that may be exposed to stormwater. Based on the large inventory of vehicles, indoor or covered storage is not economically feasible or practicable.

3.2.2 Stormwater Containment and Discharge Reduction

Table 3-2 identifies the stormwater containment and discharge reduction BMPs that divert, reuse, contain, or reduce the volume of stormwater runoff.

Table 3-2 Stormwater Containment and Discharge Reduction BMPs			
Description	Location	Runoff Sources	Potential Pollutants
Corrugated metal sheeting	Perimeter of facility	Surface flow from industrial activity	Oil and grease TSS Iron Lead Aluminum Copper
Retention pond	Northwest corner of facility	Drainage Area 1	Oil and grease TSS Iron Lead Aluminum Copper

3.2.3 Treatment Control

Table 3-3 identifies the mechanical, chemical, biological, physical or other treatment control processes that are used to treat stormwater at the facility.

Table 3-3 Treatment Control BMPs			
Process / Technology	Location	Runoff Sources	Potential Pollutants
None			

3.2.4 Other Advanced BMPs

Fully contained fluid recovery systems (Midi Vehicle Depollution System) are used in Dismantling Area during fluid draining operations. Fluid is drained from the cars and the recovery system delivers the fluids by pipes to its respective AST, thereby, reducing the chance for human error, spills, and leaks.

A wastewater treatment system (ESD Waste2Water) is used in the Parts Washer Area. Wastewater generated during parts washing operations is collected in the in-ground sumps and directed to the treatment system. Wastewater is sent through a series of baffles and bio-media covered with fixed-film microbes.

Organic contaminants, such as oils and grease, are consumed by the microbes. After biological treatment, the treated water is directed to the solids separator tank. Silt and fine solids settle to the bottom of the tank as the water flows through a series of baffles. Oily sludge from the solids separator tank is disposed off-site in accordance with Local, State, and Federal regulations. The treated water is then directed to the sanitary sewer system.

3.3 Summary of BMPs

Table 3-4 provides a summary of the industrial materials, activities, pollutant sources, potential pollutants, and BMPs the facility is implementing to minimize the discharge of pollutants in stormwater runoff.

**Table 3-4
Summary of BMPs**

Location	Pollutant Sources	Potential Pollutants	BMPs	Frequency	Responsible Person	Instructions	Equipment & Tools
Dismantling Area	• Spills and leaks • Track out	Oil and grease Iron Lead Aluminum TSS Copper	• Beneath overhead cover • Midi Vehicle Depollution System • Good housekeeping • Spill and leak prevention and response • Preventative maintenance • Material handling and waste management • Employee training	Inspections conducted daily	• Plant Manger • Facility personnel	• Inspect all areas for spills and leaks • Clean up any spills or leaks immediately • Inspect all equipment and systems to ensure good working condition	• Spill kits • Tools used to inspect equipment and related systems

**Table 3-4
Summary of BMPs**

Location	Pollutant Sources	Potential Pollutants	BMPs	Frequency	Responsible Person	Instructions	Equipment & Tools
Hazardous Waste Accumulation Area	- Spills and leaks from failures or overfills - Track out	Oil and grease	- Double-walled tanks - Midi Vehicle Depollution System - Good housekeeping - Spill and leak prevention and response - Preventative maintenance - Material handling and waste management - Employee training	Inspections conducted daily	- Plant Manger - Facility personnel	- Inspect secondary containment systems for spills and leaks - Clean up any spills or leaks immediately - Inspect all equipment and systems to ensure good working condition - Inspect tank integrity	- Spill kits - Tools used to inspect equipment and related systems
Parts Storage Racks	- Spills and leaks - Track out	Oil and grease TSS Iron Lead Aluminum Copper	- Good housekeeping - Spill and leak prevention and response - Preventative maintenance - Employee training	Inspections conducted weekly	- Plant Manager - Facility personnel	- Inspect all areas for spills and leaks - Clean up any spills or leaks immediately	- Spill kits - Tools used to inspect equipment and related systems

**Table 3-4
Summary of BMPs**

Location	Pollutant Sources	Potential Pollutants	BMPs	Frequency	Responsible Person	Instructions	Equipment & Tools
Parts Washer Area	- Pressure washing overspray - Track out - Spills and leaks	Oil and grease TSS Iron Lead Aluminum Copper Acid/base	- Beneath overhead cover - In-ground sumps - ESD Waste2Water treatment system - Good housekeeping - Spill and leak prevention and response - Preventative maintenance - Material handling and waste management - Employee training	Inspections conducted daily	- Plant Manager - Facility personnel	- Inspect all areas for spills and leaks - Clean up any spills or leaks immediately - Inspect all equipment and systems to ensure good working condition	- Spill kits - Tools used to inspect equipment and related systems
Vehicle Storage Yards & Roadways	- Spills and leaks - Loading and unloading - Windblown - Track out	Oil and grease TSS Iron Lead Aluminum Copper	- Dust control by water trucks - Good housekeeping - Spill and leak prevention and response - Preventative maintenance RETENTION POND	Inspections conducted weekly	- Plant Manager - Facility personnel	- Inspect all areas for spills and leaks - Clean up any spills or leaks immediately - Spray yard with water twice per day	- Spill kits - Tools used to inspect equipment and related systems - Water trucks

**Table 3-4
Summary of BMPs**

Location	Pollutant Sources	Potential Pollutants	BMPs	Frequency	Responsible Person	Instructions	Equipment & Tools
Loading Dock	• Spills and leaks • Track out • Loading and unloading	Oil and grease TSS Iron Lead Aluminum Copper	• Good housekeeping • Spill and leak prevention and response • Material handling and waste management • Preventative Maintenance • Employee training	Inspections conducted weekly	• Plant Manager • Facility personnel	• Inspect all areas for spills and leaks • Clean up any spills and leaks in a timely manner • Inspect all equipment and systems to ensure good working condition	• Tools used to inspect and repair equipment and related systems
Roll-Offs	• Loading and unloading • Spills and leaks	Oil and grease TSS Iron Lead Aluminum Copper	• Good housekeeping • Spill and leak prevention and response • Employee training • Preventative maintenance • Material handling and waste management	Inspections conducted weekly	• Plant Manager • Facility personnel	• Inspect all areas for spills and leaks • Clean up any spills and leaks in a timely manner • Inspect all equipment and systems to ensure good working condition	• Tools used to inspect and repair equipment and related systems

**Table 3-4
Summary of BMPs**

Location	Pollutant Sources	Potential Pollutants	BMPs	Frequency	Responsible Person	Instructions	Equipment & Tools
Tire Accumulation Area	- Track out - Loading and unloading	Oil and grease TSS	- Good housekeeping - Spill and leak prevention and response - Preventative maintenance - Employee training - Material handling and waste management	Inspections conducted weekly	- Plant Manager - Facility personnel	- Inspect all areas for spills and leaks - Clean up any spills and leaks in a timely manner	- Spill kits - Tools used to inspect and repair equipment and related systems
Fueling Area	- Track out - Spills and leaks - Vehicle fueling	Oil and grease TSS Iron Lead Aluminum Copper	- Good housekeeping - Spill and leak prevention and response - Preventative maintenance - Employee training - Material handling and waste management	Inspections conducted daily	- Plant Manager - Facility personnel	- Inspect all areas for spills and leaks - Clean up any spills and leaks in a timely manner - Inspect all equipment and systems to ensure good working condition	- Spill kits - Tools used to inspect and repair equipment and related systems

**Table 3-4
Summary of BMPs**

Location	Pollutant Sources	Potential Pollutants	BMPs	Frequency	Responsible Person	Instructions	Equipment & Tools
Mobile Crusher	• Spills and leaks from crushing operations • Loading and unloading • Track out	Oil and grease TSS Iron Lead Aluminum Copper	• Good housekeeping • Spill and leak prevention and response • Preventative maintenance • Employee training • Material handling and waste management	Inspections conducted daily	• Plant Manager • Facility personnel	• Inspect all areas for spills and leaks • Clean up any spills and leaks in a timely manner • Inspect all equipment and systems to ensure good working condition	• Spill kits • Tools used to inspect and repair equipment and related systems
Note: BMPs that are BOLD CAPS require more frequent inspection.							

3.4 Planned Improvements

The facility is currently expanding the northern portion of the Vehicle Storage Yard to extend east to Bellflower Street, adding approximately 8 acres of erodible surface to the facility. The site diagram located in **Appendix A, Figure 2** illustrates the Vehicle Storage Yard expansion to Bellflower Street.

4.0 Monitoring and Implementation Plan (MIP)

This section of the SWPPP presents the methods and procedures that are implemented at the facility to monitor the quality of the stormwater discharged from the facility and ensure that pollutant control practices are evaluated and revised as necessary to facilitate effective implementation of the BMPs and SWPPP.

4.1 Discharge Locations and / or Outfalls

Table 4-1 identifies each of the facility's stormwater discharge and / or outfall locations.

Table 4-1 Discharge / Outfall Locations				
Discharge ID	Description	Discharge Type	Location	Photograph
Outfall 1 (Sample Location 1)	Sheet flow through the corner of the fence	Surface Runoff	Northwestern corner of the facility	

4.2 Pollution Prevention Team Members

The specific members of the Pollution Prevention Team are identified in **Section 1.5** of the SWPPP. The roles and responsibilities of the various team members are outlined below:

- PPT Leader:
 - Oversees implementation of the SWPPP and delegates the responsibilities of SWPPP.
 - Ensures that the SWPPP is kept up to date.
 - Ensures that the training and monitoring are performed in accordance with the SWPPP.
- PPT Sampler & Inspector:
 - Monitoring weekly weather forecasts for storm events
 - Performs monthly visual observation inspections as prescribed in the Monitoring Implementation Plan (MIP).
 - Conducts the sampling in accordance with the MIP.
 - Ensures samples are analyzed in accordance with the MIP.
 - Keeps the PPT Leader apprised of all monitoring and sampling & analysis events and corresponding results.
- PPT Alternate:
 - Performing SWPPP-related responsibilities as assigned by the PPT Team Leader.

- | | |
|--|--|
| Qualified Industrial Stormwater Practitioner (QISP): | <ul style="list-style-type: none">• Implementing the SWPPP, performing the Annual Comprehensive Facility Compliance Evaluation, assisting in the preparation of Annual Reports, performing ERAs, and training appropriate Pollution Prevention Team members. |
| Compliance Group Leader: | <ul style="list-style-type: none">• Assist Compliance Group Participants with all compliance activities required by the IGP.• Prepare a Consolidated Level 1 and Level 2 ERA Reports for all Compliance Group Participants.• Inspect all facilities of in the Compliance Group Participants at a minimum of once per reporting year.• Entering required information into the California Water Boards Storm Water Multiple Application and Reporting Tracking System (SMARTS) in a timely manner as prescribed in the IGP. |

4.3 Monitoring

Stormwater monitoring events will be conducted during Qualified Storm Events (QSEs). A QSE is defined as any precipitation event that produces discharge for at least one drainage area and is preceded by 48 hours with no discharge from any drainage area.

4.3.1 Monthly Visual Observations

Visual observation inspections are performed at least once every calendar month. These observation inspections are conducted during dry conditions, and include observations of the outdoor facility operations, BMPs, and NSWDS. The monthly visual observation inspections are conducted during daylight hours during the facility's scheduled operating hours.

During the outdoor facility operations observations inspection, the inspector records observations of the following:

- Spills and leaks; and
- Uncontrolled pollutant sources.

During the BMP observations inspection, the inspector records observations of the following:

- BMPs that are properly implemented;
- BMPs that need maintenance to effectively function;
- BMPs that have failed; or
- BMPs that could fail to operate as designed or intended.

During the monthly visual observation inspection, the inspector also inspects each drainage area to observe whether the presence of or indications of prior unauthorized and authorized NSWDS and records the following:

- Presence or evidence of any NSWDS (authorized or unauthorized);
- Pollutant characteristics (e.g., floating or suspended material, sheen, discoloration, turbidity, odor);
- Source of discharge; and
- For authorized NSWDS, whether BMPs are in place and are functioning to prevent contact with materials or equipment that could introduce pollutants.

In the event that a monthly visual observation inspection is not performed, an explanation will be reported in the Annual Report (discussed below).

4.3.2 Sampling Event Visual Observations

Sampling event visual observation inspections are conducted at the same time discharge sampling occurs as discussed below in **Section 4.4**. Sampling events are conducted during daylight hours during the facility's scheduled operating hours within 4 hours of the start of a QSE, or at the start of facility operations if the QSE occurs within the previous 12-hour period. At each discharge location where a sample is collected (see **Figure 2, Appendix A**), the sampler / inspector records observations of the following:

- Floating and suspended materials;
- Oil and grease;
- Discoloration;
- Turbidity;
- Odors; and
- Trash/debris.

When pollutants are observed, the sampler / inspector makes additional observation inspections of the drainage area to identify the probable source of the pollutants.

In the event that a discharge location is not visually observed during the sampling event, the location of the discharge and an explanation for not obtaining observations will be recorded.

The facility will not perform sampling event observation inspections during dangerous weather conditions, including but not limited to, flooding and electrical storms. An explanation of such occurrence will be included in the Annual Report.

4.3.3 Visual Observation Records

The facility maintains a record of all visual observation inspections with this SWPPP using the Visual Observation Record included in **Appendix B**. Each visual observation record will include, at a minimum, the following information:

- Date and time;
- Name of inspector;
- Locations observed;
- Presence and probable source of any observed pollutants; and
- Any response actions and or additional SWPPP revisions necessary in response to the observations.

The inspector will brief the Pollution Prevention Team Leader on the observations made during the monthly and sampling event observation inspections.

4.4 Stormwater Sampling and Analysis

As a Compliance Group Participant of the LKQ Corporation Compliance Group, the facility collects stormwater samples from a minimum of 1 QSE within the first half of each reporting year (July 1 to December 31), and 1 QSE within the second half of each reporting year (January 1 to June 30). Sampling events are conducted during the facility's scheduled operating hours within 4 hours of the start of a QSE, or at the start of facility operations if the QSE occurs within the previous 12-hour period. The facility collects a minimum of one sample from each drainage area at all discharge locations.

The facility's sampler uses the following protocol to obtain accurate grab samples:

- Wears disposable powder-free gloves and never touches the inside of the sample container or lid;
- Fills the sample container directly from the discharge, or if necessary, in clean unused high-density polyethylene (HDPE) bottles from water pooled or flowing in the sample area, but not for O&G which must always be collected directly into the sample container;
- Collects only stormwater discharging from this facility;
- Collects the sample from a turbulent section of the central part of the flow avoiding contacting with the bottom or sides of the conveyance system;
- Fills bottles to the rim avoiding overfilling;
- Labels each sample with the following information:
 - o Date
 - o Time
 - o Sampler's Name
 - o Facility Name
 - o Sample ID
 - o Analytical Parameter
 - o Preservative

- Wraps individual samples in bubble wrap to avoid breakage;
- Lines a cooler with a plastic bag containing ice to maintain samples at approximately 4°C until delivered to the lab;
- Ties the bag inside the cooler to minimize the chance of melting ice to leak from the cooler;
- Completes a chain-of-custody and includes a copy sealed inside a plastic bag tape to the inside of the cooler lid; and
- Ensures the samples are delivered to the laboratory as soon as possible (e.g., same day delivery, pick up by laboratory courier, or an overnight courier service).

Samples are field screened for pH using litmus within the first 15 minutes after the sample is collected or the sampler may opt to use direct-reading field instruments to take pH readings of each stormwater sample. Stormwater samples will be sent to a California State Department of Health Services (DHS)-certified laboratory for analysis for total suspended solids (TSS), oil and grease (O&G), aluminum, iron, copper, zinc, and lead. **Table 4-2** identifies the specific analytical parameters, analytical method, maximum holding times, preservative, and sample container.

Table 4-2 Sampling and Analysis Parameters				
Analytical Parameter	Analytical Method	Maximum Holding Time	Preservative	Sample Container
pH	Field	Analyze Immediately	None	50 ml
TSS	SM 2540-D	7 days	Cool to 4°C	200 ml HDPE
O&G	EPA 1664A	28 days	Cool to 4°C Hydrochloric acid (HCl) or Sulfuric acid (H ₂ SO ₄) to pH<2	1-liter Boston round glass - amber
Iron	EPA 200.7	6 months	Nitric acid (HNO ₃) to pH<2	500 ml HDPE
Lead	EPA 200.8	6 months	Nitric acid (HNO ₃) to pH<2	500 ml HDPE
Aluminum	EPA 200.8	6 months	Nitric acid (HNO ₃) to pH<2	500 ml HDPE
Copper	EPA 200.8	6 months	Nitric acid (HNO ₃) to pH<2	500 ml HDPE
Zinc	EPA 200.8	6 months	Nitric acid (HNO ₃) to pH<2	500 ml HDPE
Notes: • According to the IGP, the site is required to analyze stormwater samples for pH, TSS, O&G, iron, lead, and aluminum. Additionally, the site is sampling for copper and zinc. • HDPE = high density polyethylene				

All sample collection and preservation methods are performed in accordance with the current edition of the “*Standard Methods for the Examination of Water and Wastewater*”. Any field instruments used during the sampling event will be calibrated in accordance with the manufacturers’ recommendations.

All samples will be logged on a chain-of-custody which will include, at a minimum, the following:

- Facility Name;
- Contact Name;
- Sample Location;
- Date and Time of Sample Collection;
- Requested Analysis;
- Requested Turn-Around Time;
- Total Number of Containers;
- Name of Sampler; and
- Signature of person relinquishing and receiving samples.

An example of a chain-of-custody records is included in **Appendix C**.

If samples cannot be collected due to drought conditions or any other unavoidable reason, explanation and justification will be included in the Annual Report.

The facility will not collect samples during dangerous weather conditions, including but not limited to, flooding and electrical storms. An explanation of such occurrence will be included in the Annual Report.

4.4.1 Alternative Discharge Locations

There are no discharge locations that are either affected by stormwater run-on from surrounding areas that cannot be controlled and or difficult to observe or sample.

4.4.2 Representative Sampling Reduction

The facility does not conduct representative sampling reduction at this time.

4.4.3 Qualified Combined Samples

The facility does not conduct qualified combined sampling at this time.

4.4.4 Temporary Suspension of Activities

There will be no temporary suspension of industrial activities to warrant a lack of monitoring.

4.5 Annual Comprehensive Facility Compliance Evaluation

The facility performs an Annual Evaluation of the facility's SWPPP and facility operations for each reporting year (July 1 through June 30), which is performed within 16 months of the previous annual evaluation. In the event this annual evaluation occurs fewer than 8 months or more than 16 months after the previous annual evaluation, the facility will provide an explanation and justification for doing so. At a minimum, the annual evaluation includes the following:

- A review of all sampling events, visual observation and inspection records from the previous reporting year;
- An inspection of all areas of industrial activity and associated potential pollutant sources for evidence of, or the potential for, pollutants entering the stormwater conveyance system;
- An inspection of all drainage areas previously identified as having no exposure to industrial activities and materials;
- An inspection of equipment needed to implement the BMPs;
- An inspection of all BMPs;
- A review and effectiveness assessment of all BMPs for each area of industrial activity and associated potential pollutant sources to determine if the BMPs are properly designed, implemented, and are effective in reducing and preventing pollutants in industrial stormwater discharges and authorized NSWDS; and
- An assessment of any other factors needed to comply with the requirements of Section XVI.B of the IGP.

This SWPPP will be revised as appropriate and such revisions will be implemented within 90 days of the Annual Evaluation. The revised SWPPP will be certified by the Legally Responsible Party (LRP) and submitted via the SMARTS within 30 days, but not more frequently than once every 3 months unless the SWPPP contains significant revisions such as changes in facility contacts or PPT members, changes or addition of BMPs, or changes in or addition of industrial activities that impact stormwater discharge.

An Annual Comprehensive Facility Compliance Evaluation form is included in **Appendix B**.

4.6 Annual Report

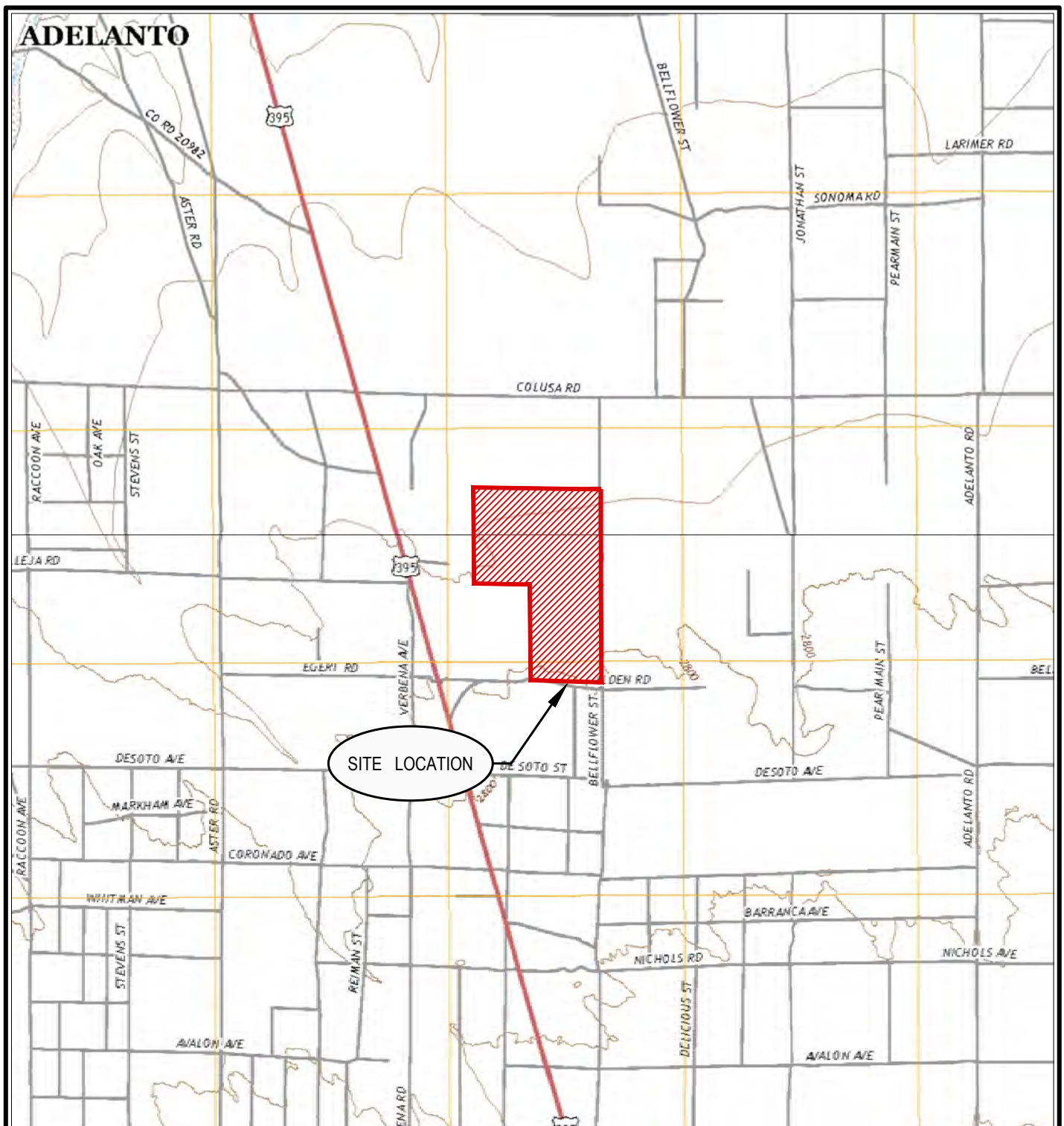
The facility will submit and certify an Annual Report no later than July 15 following each reporting year using the standard format and checklists in Stormwater Multiple Application and Reporting Tracking System (SMARTS). The Annual Report will include the following:

- A Compliance Checklist that indicates whether the facility complies with and has addressed all applicable requirements of the Industrial General Permit;
- An explanation for any non-compliance of requirements within the reporting year, as indicated in the Compliance Checklist;
- An identification, including page numbers and / or sections, of all revisions made to the SWPPP within the reporting year; and,

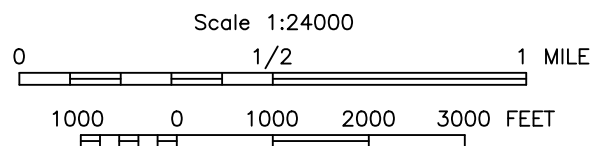
- The date of the Annual Evaluation.

APPENDIX A

Figures



QUADRANGLE LOCATION



(SOURCE OF MAP IS USGS 7.5 MINUTE QUADRANGLE MAP, ADELANTO (2018) AND VICTORVILLE NW (2018), CALIFORNIA)



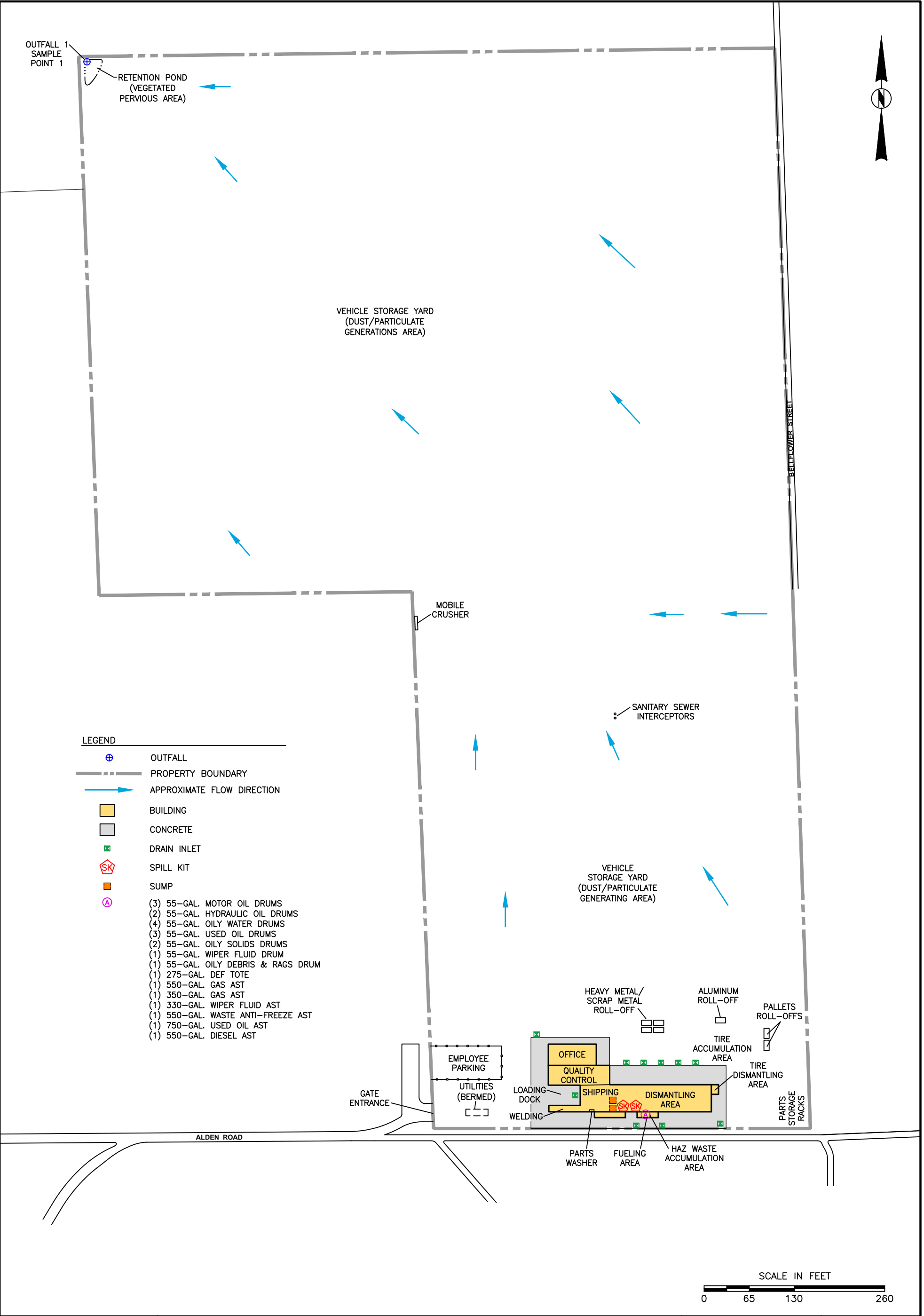
CHECK BY	DC
DRAWN BY	OS
DATE	6-20-24
SCALE	AS SHOWN
CAD NO.	LK001-0524036-24007074
PRJ NO.	LK001-0524036-24007074

SITE LOCATION MAP
LKQ LAKENOR AUTO & TRUCK SALVAGE, INC.
11200 ALDEN ROAD
ADELANTO, CALIFORNIA



FIGURE

1



CHECK BY DC	SITE LAYOUT DIAGRAM LKQ LAKENOR AUTO & TRUCK SALVAGE, INC. 11200 ALDEN ROAD ADELANTO, CALIFORNIA		FIGURE 2
DRAWN BY OS			
DATE 6-17-24			
SCALE AS SHOWN			
CAD NO. LKQ001-0524036-24007074			
PRJ NO. LKQ001-0524036-24007074			

APPENDIX B
Visual Observations Forms
and
Annual Comprehensive Facility Compliance Evaluation Form

Monthly Visual Observations

As described in **Section 4.3.1** of the SWPPP, a visual observation is required at least once every calendar month. These observation inspections **must be conducted during dry conditions**, during daylight hours, and during the facility's scheduled operating hours. **Each location identified in Table 3-4 of the SWPPP must be inspected.**

Inspector: _____ Signature: _____

Date of Previous Precipitation Event: _____ Time of Previous Precipitation Event: _____

Today's Date: _____ Time of Inspection: _____

Presence or indications of any authorized NSWs? (refer to Section 2.5 of the SWPPP)	Yes		No	
If yes – describe, including source, pollutant characteristics (floating or suspended material, sheen, discoloration, turbidity, odor), and associated BMPs and whether they are functioning to prevent contact with materials or equipment that could introduce pollutants.				
Presence or indications of prior, current, or potential unauthorized NSW? (refer to Section 2.5 of SWPPP)	Yes		No	
If yes – describe, including source, pollutant characteristics (floating or suspended material, sheen, discoloration, turbidity, odor)				
Any stormwater discharge observed?	Yes		No	
If yes – describe, including source because these monthly visual observation inspections must be conducted during dry conditions:				

Monthly Visual Observations Cont.

Describe observations of all outdoor industrial equipment and storage areas, outdoor industrial activity areas, BMPs, and all other potential sources of industrial pollutants – refer to SWPPP Table 3-4 for complete list of locations and BMPs. Observations must include any presence or indications of spills, leaks, or uncontrolled pollutant sources. Also, record any response actions and or additional SWPPP revisions necessary in response to observations. Keep completed forms with SWPPP.	
List Location In this Column	Record Observations in this Column
Dismantling Area	
Hazardous Waste Accumulation Area	
Parts Storage Racks	
Parts Washer Area	
Vehicle Storage Yards & Roadways	
Loading Dock	
Roll-Offs	
Tire Accumulation Area	

Monthly Visual Observations Cont.

Describe observations of all outdoor industrial equipment and storage areas, outdoor industrial activity areas, BMPs, and all other potential sources of industrial pollutants – refer to SWPPP Table 3-4 for complete list of locations and BMPs. Observations must include any presence or indications of spills, leaks, or uncontrolled pollutant sources. Also, record any response actions and or additional SWPPP revisions necessary in response to observations. Keep completed forms with SWPPP.	
List Location In this Column	Record Observations in this Column
Fueling Area	
Mobile Crusher	

Sampling Event Visual Observations

As discussed in **Section 4.3.2** of the SWPPP, sampling event visual observation inspections must be conducted at the same time the discharge sampling occurs. Sampling events must be conducted during the facility's scheduled operating hours within 4 hours of the start of a Qualified Storm Event (QSE). A QSE is defined as any precipitation event that produces discharge for at least one drainage area and is preceded by 48 hours with no discharge from any drainage area. Note: if the QSE occurred within the previous 12-hour period prior to the start of scheduled operating hours, the sampling event must be conducted within 4 hours at the start of the facility operations. As a Compliance Group Participant of the LKQ Corporation Compliance Group, one sampling event must be conducted between July 1 and December 31, and one sampling event must be conducted between January 1 and June 30, for a total of 4 events for each reporting year. **Complete one of these forms for EACH Sample Point identified in Table 4-1 of the SWPPP.**

Inspector: _____ Signature: _____

Date of Previous Discharge Event: _____ Time of Previous Discharge Event: _____

Discharge Location / Outfall ID: _____ (refer to SWPPP **Table 4-1**)

Today's Date: _____ Time of Inspection: _____

Time QSE Started:			Time SW Discharge Started:		
Time of Inspection:			Sample Collected?	Yes	No
If sample collected – record the sample ID:					
<i>Circle Yes / No to indicate whether any of the following characteristics were observed at this discharge location / outfall during this sampling event visual observation inspection.</i>					
Floating materials	Yes	No	Suspended materials	Yes	No
Oil/Grease sheen	Yes	No	Cloudiness / Turbidity	Yes	No
Discoloration	Yes	No	Odor	Yes	No
Trash / Debris / Other	Yes	No	Describe:		
Include additional comments regarding observations. When pollutants are observed, the inspector must attempt to identify the probable source of the pollutants.					

SWPPP Annual Comprehensive Facility Compliance Evaluation Form

As described in **Section 4.5** of the SWPPP, the facility is required to perform an annual evaluation of the facility's SWPPP for each reporting year (July 1 through June 30). **Complete this evaluation between 8 and 16 months of the previous annual evaluation. The SWPPP and MIP shall be revised and implemented, as necessary, within 90 days of this evaluation.**

Inspector: _____ Signature: _____

Date of Previous Evaluation: _____ Date of this Evaluation: _____

List Location In This Column – refer to SWPPP Table 3-4	Any BMPs not fully implemented? (circle)		Any additional BMPs needed in this Location? (circle)		Describe any deficiencies in the BMPs or the implementation of the BMPs and any revised or additional BMPs or corrective actions along with the date(s) of implementation
	Yes	No	Yes	No	
Dismantling Area					
Hazardous Waste Accumulation Area					
Parts Storage Racks					
Parts Washer Area					
Vehicle Storage Yards & Roadways					
Loading Dock					
Roll-Offs					
Tire Accumulation Area					

List Location In This Column – refer to SWPPP Table 3-4	Any BMPs not fully implemented? (circle)		Any additional BMPs needed in this Location? (circle)		Describe any deficiencies in the BMPs or the implementation of the BMPs and any revised or additional BMPs or corrective actions along with the date(s) of implementation
Fueling Area	Yes	No	Yes	No	
Mobile Crusher	Yes	No	Yes	No	
	Yes	No	Yes	No	
Circle Yes / No as appropriate and provide explanation for any “Yes” response.					

Circle Yes / No as appropriate and provide explanation for any “No” response.		
Have you inspected all of the potential pollutant sources and industrial activities (e.g., areas where spills and leaks occurred during last year, outdoor wash and rinse areas, outdoor vehicle disassembly and storage areas, loading and unloading areas, waste storage/disposal areas, dust-/particulate-generating areas, erodible areas, fluid management areas, fueling/maintenance areas, NSWD generating areas)?	Yes	No
Explanation if No:		
Have you reviewed your SWPPP to assure that its BMPs address existing potential pollutant sources and industrial activity areas?	Yes	No
Explanation if No:		
Have you inspected the entire facility to verify that the SWPPP’s site layout diagram is up-to-date (e.g., facility boundaries, outline of drainage areas, areas impacted by run-on, stormwater discharge locations, stormwater collection and conveyance system, structural control measures such as catch basins, berms, containment areas, oil/water separators)?	Yes	No
Explanation if No:		
Have you reviewed all of the Industrial General Permit records (monthly visual observations, sampling event visual observations, sampling and analysis records, records of spills/leaks and associate response activities, preventative maintenance inspection and maintenance records) generated since the last annual evaluation?	Yes	No
Explanation if No:		
Have you reviewed the major elements (PPT members, assessment of potential pollutant sources, list of significant materials, identification and description of BMPs, description of potential pollutant sources) of the SWPPP to ensure compliance with the Industrial General Permit?	Yes	No
Explanation if No:		
Have you reviewed your SWPPP to ensure that a) the BMPs are adequate in reducing or preventing pollutants in stormwater discharges and authorized NSWDs; and b) the BMPs are being implemented? BMP categories that should be reviewed include: good housekeeping practices, preventative maintenance, spill response, material handling and storage practices, employee training, waste handling/storage, erosion control, structural BMPs, treatment BMPs, and quality assurance.	Yes	No
Explanation if No:		
Has all material handling equipment and equipment needed to implement the SWPPP been inspected?	Yes	No
Explanation if No:		

APPENDIX C

Chain-of-Custody Record Example



Environment Testing
Calscience

2841 Dow Avenue, Suite 100, Tustin, CA 92780 • (714) 895-5494

For courier service / sample drop off information, contact us26_sales@eurofinsus.com or call us.

FRM51408 Rev. 1.2

CHAIN-OF-CUSTODY RECORD

DATE:

PAGE: 1 OF 1

LABORATORY CLIENT: Apex Companies, LLC						CLIENT PROJECT NAME / NO.: LKQ 1711 - 11200 Alden Road, Adelanto, CA 92301				P.O. NO.:																	
ADDRESS: 5355 Avenida Encians, Suite 107						PROJECT CONTACT: Melody Emchick / Tim Klein				LAB CONTACT OR QUOTE NO.:																	
CITY: Carlsbad		STATE: CA		ZIP: 92008		GLOBAL ID:		LOG CODE:		SAMPLER(S): (PRINT)																	
TEL: 858-877-9038		E-MAIL: melody.emchick@apexcos.com / taklein@LKQCORP.com																									
TURNAROUND TIME (Rush surcharges may apply to any TAT not "STANDARD"): ☐ SAME DAY ☐ 24 HR ☐ 48 HR ☐ 72 HR ☐ 5 DAYS ☒ STANDARD						REQUESTED ANALYSES Please check box or fill in blank as needed.																					
EDD:																											
☐ COELT EDF ☐ OTHER																											
SPECIAL INSTRUCTIONS: J-flags needed for stormwater samples pH reading (field measurement): 																											
LAB USE ONLY	SAMPLE ID	SAMPLING		MATRIX	NO. OF CONT.	Unpreserved	Preserved	Field Filtered	☐ TPH(g) ☐ GRO	☐ TPH(d) ☐ DRO	TPH ☐ C6-C36 ☐ C6-C44	TPH	BTEX / MTBE ☐ 8260 ☐	VOCs (8260)	Oxygenates (8260)	Prep (5035) ☐ En Core ☐ Terra Core	SVOCs (8270)	Pesticides (8081)	PCBs (8082)	PAHs ☐ 8270 ☐ 8270 SIM	T22 Metals ☐ 6010/747X ☐ 6020/747X	Cr(VI) ☐ 7196 ☐ 7199 ☐ 218.6	EPA 200.7 Fe	EPA 200.8 Al, Cu, Pb, Zn	EPA 1664A HEM: Oil and Grease	SM 2540 D TSS	
		DATE	TIME																								
	Outfall 1			W	3	X	X																	X	X	X	X
Relinquished by: (Signature)				Date:	Time:	Received by: (Signature/Affiliation)				Date:				Time:													
Relinquished by: (Signature)				Date:	Time:	Received by: (Signature/Affiliation)				Date:				Time:													
Relinquished by: (Signature)				Date:	Time:	Received by: (Signature/Affiliation)				Date:				Time:													

APPENDIX D

Stormwater Training Records

Stormwater Pollution Prevention Training Record

Annual training must be scheduled and conducted by the facility owner or operator for operating personnel to maintain employee awareness regarding stormwater pollution prevention practices.

X	Briefing/Training Topic		
X	SWPPP Responsibilities and Review of Objectives		Other topics (list):
X	Best Management Practices from SWPPP		
X	Monitoring and Inspection Program		

Printed Name of Trainer

Signature of Trainer

Date

Print Name of Employee	Signature of Employee	Date

Notes:

1. Attach training materials or handouts used.
2. Completed Training Forms shall be filed in SWPPP and kept for at least 5 years

APPENDIX E

Exceedance Response Action (ERA) Reports

CONSOLIDATED LEVEL 1 EXCEEDANCE RESPONSE ACTION (ERA) REPORT (AI)

For

LKQ Corporation

1280 – Ontario, 1291 – San Bernadino, 1292 – Hesperia
1711 – Adelanto, 1800 – Redding & 1820B – Stockton

Compliance Group Leader (CGL)

Timothy Klein
LKQ Corporation
7411 Goen Place, Suite B
San Diego, CA 92120
(858) 997-4939

Level 1 ERA Prepared by:

Apex Companies, LLC
5355 Avenida Encinas, Suite 107
Carlsbad, CA 92008

Level 1 ERA Preparation Date

December 2023

Table of Contents

Introduction	1
1.0 Facility Information	1
2.0 QISP Information.....	3
3.0 Summary of Numeric Action Level (NAL) Exceedances	3
4.0 SWPPP Review	4
5.0 Evaluation/Identification of Potential Pollutant Sources.....	4
6.0 Minimum BMP Evaluation	5
7.0 Advanced BMPs.....	6
8.0 Additional BMPs Selected for Implementation.....	6
9.0 Modification to Existing Monitoring Implementation Program (MIP)	6
10.0 Evaluation and Report Completion/Submittal Information	7

Appendices

- A Summary of Stormwater Results
- B Site Maps

Facility Name:	LKQ Pick Your Part - Ontario (1280)
Waste Discharge Identification (WDID):	8 36I005137
Date Entered Level 1 Status:	July 1, 2023
Facility Name:	LKQ – Midnight Truck and Auto Recyclers (1291)
Waste Discharge Identification (WDID):	8 36I023433
Date Entered Level 1 Status:	July 1, 2017
Facility Name:	LKQ Pick Your Part – Hesperia (1292)
Waste Discharge Identification (WDID):	6B36I023434
Date Entered Level 1 Status:	July 1, 2018
Facility Name:	LKQ Lakenor Auto Truck Salvage, Inc. (1711)
Waste Discharge Identification (WDID):	6B36I025934
Date Entered Level 1 Status:	July 1, 2020
Facility Name:	LKQ – Select Auto and Truck Recyclers - Redding (1800)
Waste Discharge Identification (WDID):	5R45I024352
Date Entered Level 1 Status:	July 1, 2023
Facility Name:	LKQ – Acme Truck Parts (1820-B)
Waste Discharge Identification (WDID):	5S39I023655
Date Entered Level 1 Status:	July 1, 2023

"I certify under penalty of law that this document and all Attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, to the best of my knowledge and belief, the information submitted is, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Timothy Klein

*Compliance Group Leader (CGL) / Duly Authorized
Representative (DAR)*

Tim Klein

Signature of CGL / DAR

12-12-23

Date

Introduction

California's National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Industrial Activity – Order 2014-0057-DWQ (General Permit) requires a Level 1 Exceedance Response Action (ERA) Evaluation and Report to be developed if there are Numeric Action Level (NAL) exceedances as defined in the Industrial General Permit (IGP). This report identifies potential industrial activities that may have contributed to pollutant concentrations above the NALs during the 2022-2023 reporting year. This Level 1 ERA Report describes the Best Management Practices (BMPs) and revisions to the facility's Storm Water Pollution Prevention Plan (SWPPP) to reduce pollutant concentrations in storm water runoff. This report was prepared in accordance with the requirements of the IGP.

The LKQ Corporation Stormwater Compliance Group was formed to create a group of dischargers with similar industrial activities, pollutant sources, and pollutant characteristics and to share knowledge and implementation of BMPs to reduce those pollutants at each site. This Consolidated ERA Level 1 Evaluation and Report (Consolidated Report) for Total Aluminum (Al) Exceedances was prepared by the Compliance Group Leader (CGL), Timothy Klein, QISP and ToR #901. The Level 1 ERA assessments were conducted during 2023 in conjunction with the Annual Site Compliance Evaluation site visits. For the Compliance Group, in accordance with Section XIV.B.3 of the Permit, "A Compliance Group Leader shall prepare a Consolidated Level 1 ERA Report for all Compliance Group participants with Level 1 status for the same parameter. Compliance Group participants who certify and submit these Consolidated Level 1 ERA Reports are subject to the same provisions as individual Dischargers with Level 1 status, as described in Section XII.C. A Consolidated Level 1 ERA Report is equivalent to a Level 1 ERA Report."

1.0 Facility Information

The primary function at the LKQ Corporation participant sites consists of automotive dismantling and parts recycling. Three sites in the LKQ Corporation Stormwater Group were identified in the Water Board's Storm Water Multiple Application and Report Tracking System (SMARTS) as moving from baseline status to Level 1 status for Al Annual Average exceedances compared with the NALs identified in the permit during the 2022-2023 reporting year. The participant sites are listed in the following table, which includes participant sites that were already in Level 1 for Al prior to the 2022-2023 reporting year.

Facility Name	LKQ Pick Your Part - Ontario (1280)
Address	2025 South Milliken Avenue, Suite A, Ontario, CA 91761
WDID	8 36I005137
SIC Code(s)	5015
Designated LRP	Veronica Chavez
Discharger Contact Person	Veronica Chavez
Phone Number	(442) 262-7489
E-mail Address	vxchavez@lkqcorp.com

Facility Name	LKQ – Midnight Truck and Auto Recyclers (1291)
Address	434 E. 6 th Street, San Bernadino, CA 92410
WDID	8 36I023433
SIC Code(s)	5015
Designated LRP	Esteban Viramontes
Discharger Contact Person	Esteban Viramontes
Phone Number	909-663-8433
E-mail Address	exviramontes@lkqcorp.com
Facility Name	LKQ Pick Your Part – Hesperia (1292)
Address	11399 Santa Fe Avenue East, Hesperia, CA 92345
WDID	6B 36I023434
SIC Code(s)	5015
Designated LRP	Angel Gutierrez
Discharger Contact Person	Angel Gutierrez
Phone Number	760-275-5077
E-mail Address	axgutierrez@LKQCORP.com
Facility Name	LKQ Lakenor Auto Truck Salvage, Inc. (#1711)
Address	11200 Alden Road, Adelanto, CA 92301
WDID	6B36I025934
SIC Code(s)	5015
Designated LRP	Nicky Castillo
Discharger Contact Person	Nicky Castillo
Phone Number	209-345-0204
E-mail Address	nidcastillo@LKQCORP.com
Facility Name	LKQ – Select Auto and Truck Recyclers - Redding (1800)
Address	19895 Viking Way, Redding, CA 96003
WDID	5R45I024352
SIC Code(s)	5015
Designated LRP	Jesse Oster
Discharger Contact Person	Jesse Oster
Phone Number	530-356-7216
E-mail Address	JSOster@lkqcorp.com

Facility Name	LKQ – Acme Truck Parts (1820-B)
Address	1049 South Wilson Way, Stockton, CA 95205
WDID	5S39I023655
SIC Code(s)	5015
Designated LRP	Johnny Farah
Discharger Contact Person	Johnny Farah
Phone Number	415-525-2282
E-mail Address	jfarah@lkqcorp.com

2.0 QISP Information

The IGP requires the discharger to enlist the services of a Qualified Industrial Stormwater Practitioner (QISP) to assist with the ERA Level 1 Evaluation and prepare the ERA Level 1 Report. Information related to the QISP assisting with this evaluation and report are included below.

Name: Timothy Klein

QISP/Tor Cert. Number: 00901

Affiliation: LKQ Corporation

Phone Number: 858-997-4939

E-mail Address: taklein@lkqcorp.com

Scope of Services Provided: ERA Level 1 Evaluation and Report

3.0 Summary of Numeric Action Level (NAL) Exceedances

The following table summarizes the NAL exceedance(s) being addressed in this Level 1 ERA Evaluation and Report.

Site	Parameter Exceeded ¹	2022-2023 Annual NAL Exceedance	Data Summary Used to Calculate Annual Average NAL Exceedance		
			# of Samples	Sum of Results	Discharge Point(s)
1280	AI	1.60 mg/L	2	3.191 mg/L	Outfall 1
1800	AI	0.819 mg/L	4	3.277 mg/L	Outfall 1 Outfall 2
1820B	AI	0.809 mg/L	3	2.428 mg/L	Outfall 001

¹NAL exceedances summarized in this table are consistent with SMARTS.

4.0 SWPPP Review

The SWPPPs were reviewed to assess compliance with requirements outlined in Section X of the IGP. This review includes all sections of the SWPPPs, including the site map, monitoring implementation plan, potential pollutant generating activities, and BMP selection and implementation. The table below summarizes the review.

Site	SWPPP (General Permit Section)	SWPPP Page # or Reference Location	Date Implemented or Last Revised	Comments
1280	Stormwater BMPs (Section X.H)	§3.0	December 2021	Section 3.0 in each of the SWPPPs will be updated to include the additional Level 1 ERA BMPs listed in this report.
1800		§3.0	November 2022	
1820B		§3.0	November 2023	Section 3.0 was updated to include the additional Level 1 ERA BMPs listed in this report.

5.0 Evaluation/Identification of Potential Pollutant Sources

Pollutant source evaluation for each parameter exceeding an NAL are summarized in **Section 3.0** above. Findings related to the evaluation are summarized below.

Parameter Exceeded	Potential Source/Activity Generating Exceedance	Likely Source	Existing BMPs to Address the Source
Total Aluminum	- Naturally occurring metals are found within soil at the site; - The inventory of vehicles being held in storage throughout the yard; - Automotive crushing and scrap activities; - On-site structures, equipment, and fencing; - Airborne dust and particulate deposition from on- and off-site locations.	- Industrial - Natural Background	- Employee training - Good housekeeping - Preventative maintenance - Material handling and waste management - Spill and leak prevention and response - Erosion and sediment control - Overhead cover - Bioswales - Dust control - Retention basins - Triton filters - Work conducted indoors when possible

Based on the evaluation, is additional investigation and/or monitoring necessary to identify the potential pollutants source(s)? ☐ Yes ☒ No

If yes, document the specific parameter and the additional investigation/monitoring needed to establish the pollutant source in the table below.

Parameter	Additional Investigation/Monitoring	Goal/Objective
N/A	N/A	N/A

6.0 Minimum BMP Evaluation

An evaluation of the Minimum BMPs (IGP Section X.H.1) included in the SWPPP was performed to assess if adequately implemented at the site, particularly for those areas identified as potential pollutant sources in **Section 5.0** of this report. Minimum BMP deficiencies are identified in the table below.

Site	Deficiency Noted
1280	A minor amount of car parts observed on the ground in the Retail Sales Yard.
	Moderate amounts of sediment were observed inside the drop inlet located in the Impound Yard.
	Outfalls 2 and 3 were observed accumulating trash, leaves, and debris.
1820B	Miscellaneous truck parts were observed staged near Outfall 2.
	A trash roll-off was observed within three feet of a storm drain.
	A 55-gallon drum of Used DEF was observed outside without secondary containment. Oily fluids were observed inside the spill pallet of a Used Oil AST.
1800	A moderate amount of trash and sediment was observed accumulating near Outfalls 1- 4.
	Minor to moderate amounts of car parts were observed on the ground in the Vehicle Storage Yard and in the swale that runs north of Outfall 3.
	Vehicle crushing is reportedly conducted on soil.
	Dirt and car parts were observed in the stormwater swale in Drainage Area 2.
	Sediment and trash were observed accumulating in a storm inlet.
1291	Minor to moderate amounts of car parts observed in the Retail Lots.
	Minor to moderate amounts of staining observed throughout the facility.
	Some staining was observed near the Outfall 2.
	Two drums were observed outside the bermed area.
1292	A drainage table near the Dismantling Area was observed with significant staining on the ground.
	Moderate amounts of spills and staining observed in the Dismantling / Fluid Draining Area.
	Minor to moderate to amount of car parts were observed on the ground in the yard from day-to-day operations.
	A gasoline tank was observed with significant staining on the exterior of the tank and outside the containment was observed.
1711	Moderate amounts of trash, sediment, and debris observed around the stormwater drain inlets on the east side of the site.
	Significant amounts of sediment surround the drain inlets in the north side of the main building.
	Moderate amounts of trash and parts were observed near the outfall.
	Moderate amounts of spills and staining observed on the ground in the west side of the Dismantling Area.
	Moderate amounts of car parts were observed throughout the yard due to day-to-day operations.

Site	Deficiency Noted
1711	A degreaser tote was observed located within a few feet of an open door without secondary containment.
	Moderate amounts of water and sediment from the parts washer was observed leaking into the secondary containment of the propane tank.

7.0 Advanced BMPs

An evaluation of any Advanced BMPs (IGP Section X.H.2) was performed to assess if adequately implemented at the site. Advanced BMPs deficiencies are identified in the table below.

Site	Deficiency Noted
1800	Straw wattle was observed misplaced and/or dirty at Outfalls 2-4.
1291	Vegetation in the retention basins and swales were observed overgrown and in need of maintenance.
1292	Pond was observed with overgrown vegetation near the Welding Area.
	Minor amounts of trash were observed at the basin near Outfall 3.
	Tires and debris were observed accumulating in the basin in the Retail Sales Yard.
1711	Significant amounts of materials were stored around the detention basin.

8.0 Additional BMPs Selected for Implementation

Based on the pollutant source evaluation and evaluation of existing BMPs implemented at the site, the following additional BMPs or improvements to existing BMPs will be implemented to control pollutants generated from on-site industrial activities. Sections of the SWPPP will be revised to reflect the additional BMPs identified below.

Parameter Exceeded	Additional BMP(s) Implemented to Address Exceedance	Site	Date Implemented or Schedule for Implementation	SWPPP Section
Total Aluminum	Install Filtrexx Metaloxx at outfalls in addition to existing metal/oil booms	1280 1800 1820B	September- November 2023	Section 3.0
	Hydraulic Study	1800	September- November 2023	

9.0 Modification to Existing Monitoring Implementation Program (MIP)

The following are changes or modifications made to the monitoring program, if any, in response to this evaluation. Modifications could be related to monitoring locations, sampling methodology, sampling frequency, and analytical parameters. Goals/objectives of monitoring program changes and how they relate to potential BMP improvements are listed below.

Additional Investigation(s)/Modification(s)	Goal/Objective
N/A	N/A

10.0 Evaluation and Report Completion/Submittal Information

Date ERA Level 1 Evaluation Completed: 1280 6/30/2023; 1800 4/25/2023; 1820B 4/24/2023

Date BMP Implementation Complete: September-November 2023

Date ERA Level 1 Report Certified and Submitted: 12/12/2023

APPENDIX A

Summary of Stormwater Results

2022-2023 Summary of Stormwater Discharge Sampling Results
LKQ Pick Your Part 1280
2025 South Milliken Avenue, Suite A
Ontario, California

Constituents		pH	TSS	O&G	Al	Cu	Fe	Pb	Zn
Unit		pH units	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Permit Limits	Instantaneous Maximum NAL	6.0-9.0	400	25	NA				
	Annual NAL	NA	100	15	0.75	0.0332	1.0	0.262	0.26
Sample Date	Location(s)								
9-Nov-2022	Outfall 1	6.80	21.8	2.23	0.981	0.0498	1.18	0.0240	0.101
5-Jan-2023	Outfall 1	6.20	57.3	4.02	2.21	0.0475	2.98	0.0591	0.207

Annual Average: **NA** **39.6** **3.13** **1.60** **0.0487** **2.08** **0.0416** **0.154**

Notes: TSS - Total Suspended Solids
O&G - Oil and grease
Al - Aluminum
Cu - Copper
Fe - Iron
Pb - Lead

Zn - Zinc
NA - Not available; not analyzed
mg/L - milligrams per liter
NAL - Numeric Action Level
200 Results reported at or above (outside) the NAL

2022-2023 Summary of Stormwater Discharge Sampling Results
LKQ Select Auto and Truck Recyclers 1800
19895 Viking Way
Redding, California

Constituents		pH	TSS	O&G	Al	Cu	Fe	Pb	Zn
Unit		pH units	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Permit Limits	Instantaneous Maximum NAL	6.0-9.0	400	25	NA				
	Annual NAL	NA	100	15	0.75	0.0332	1.0	0.262	0.26
Sample Date	Location(s)								
1-Dec-2022	Outfall 1	7.8	38.0	ND<0.516	1.20	0.0157	1.90	0.00283	0.0364
	Outfall 2	7.9	48.0	0.983	1.65	0.0217	2.90	0.00367	0.0459
9-Jan-2023	Outfall 1	7.6	8.80	ND<0.497	0.253	0.00914	0.240	0.00180	0.0372
	Outfall 2	7.9	7.80	ND<0.494	0.174	0.00390	0.196	0.000612	0.0242

Annual Average: **NA** **25.7** **0.25** **0.819** **0.0126** **1.31** **0.00223** **0.0359**

Notes: TSS - Total Suspended Solids
O&G - Oil and grease
Al - Aluminum
Cu - Copper
Fe - Iron
Pb - Lead

Zn - Zinc
NA - Not available; not analyzed
mg/L - milligrams per liter
NAL - Numeric Action Level
200 Results reported at or above (outside) the NAL

2022-2023 Summary of Stormwater Discharge Sampling Results
LKQ ACME Truck Parts 1820B
1049 South Wilson Way
Stockton, California

Constituents		pH	TSS	O&G	Al	Fe	Pb	Cu	Zn
Unit		pH units	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Permit Limits	Instantaneous	6.0-9.0	400	25	NA				
	Maximum NAL								
	Annual NAL	NA	100	15	0.75	1.0	0.262	0.0332	0.26
Sample Date	Location(s)								
8-Nov-2022	Outfall 001	6.8	19.8	1.79	0.613	0.880	0.00459	0.0255	0.204
27-Feb-2023	Outfall 001	6.8	47.6	2.20	1.10	1.50	0.00705	0.0131	0.131
21-Mar-2023	Outfall 001	6.2	21.6	1.18	0.715	1.03	0.00368	0.0140	0.126

Annual Average: NA 29.7 1.72 0.809 1.14 0.00511 0.0175 0.154

Notes: TSS - Total Suspended Solids
O&G - Oil and grease
Al - Aluminum
Cu - Copper
Fe - Iron
Pb - Lead

Zn - Zinc
NA - Not available; not analyzed
mg/L - milligrams per liter
NAL - Numeric Action Level
Results reported at or above (outside) the NAL

APPENDIX B

Site Maps

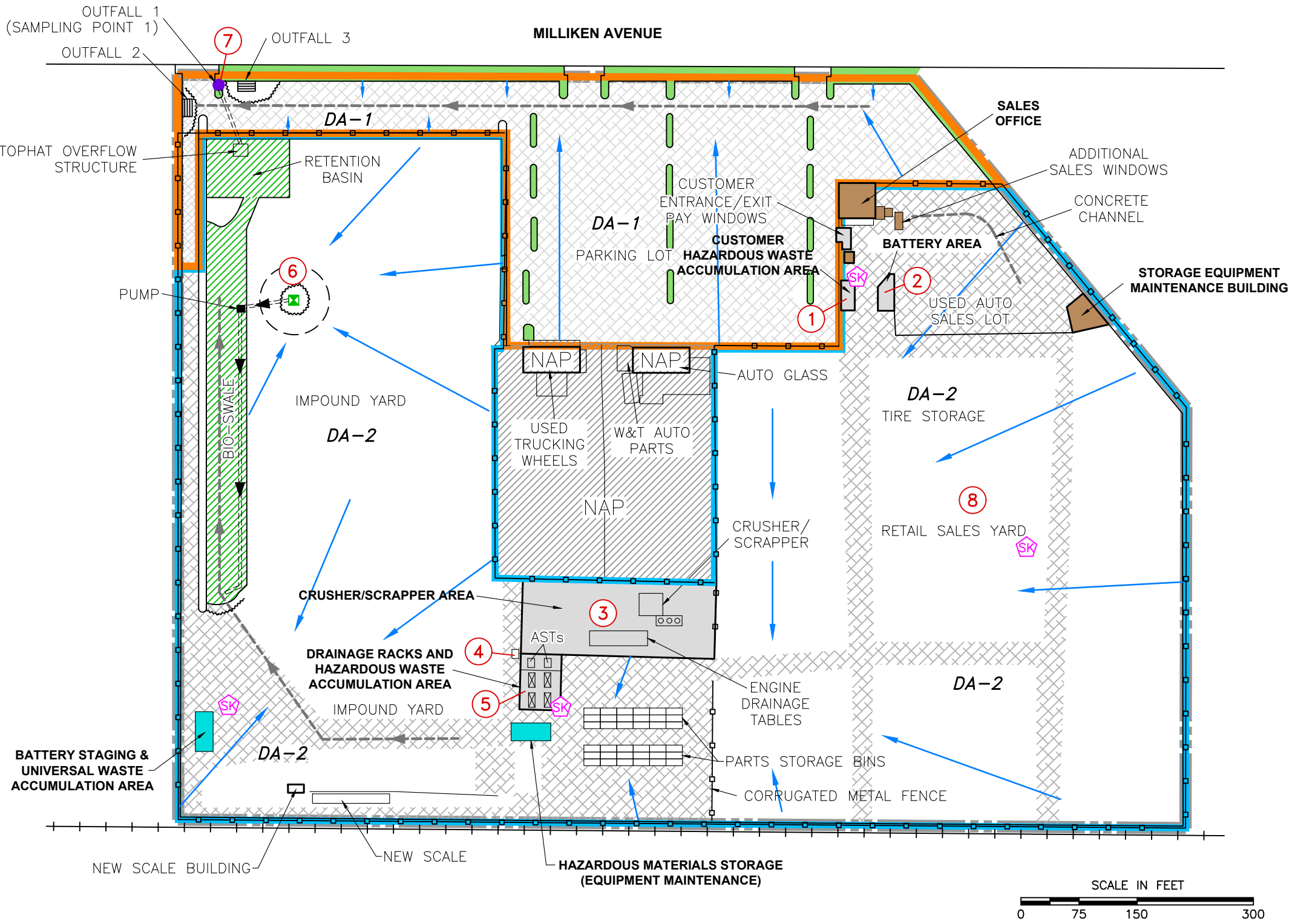
LEGEND

- SAMPLING POINT 1 (MANHOLE)
- DROP INLET
- SPILL KIT
- CATCH BASINS/CURB INLETS (2) WITH FILTER INSERTS DEBRIS GUARDS
- NOT A PART OF LKQ (LEASED FROM OWNER)
- DRAINAGE RACK
- BUILDING
- CANOPY/AWNING
- PAVED
- LANDSCAPED AREAS (GRASS AND TREES)
- CLOSED STORAGE CONTAINER
- UNDERGROUND STORMWATER CONVEYANCE PIPE
- CONCRETE CHANNEL/V-DITCH (CONCENTRATED FLOW PATH)
- FLOW DIRECTION
- CORRUGATED SHEET METAL FENCE
- ABSORBENT BOOMS AND STRAW WATTLE

- DA-1** DRAINAGE AREA #1, IMPERVIOUS/ASPHALT DISCHARGE TO PARKING LOT CURB INLETS
- DA-2** DRAINAGE AREA #2, PERVIOUS/GRAVEL AND IMPERVIOUS/ASPHALT MIX THAT DISCHARGES TO BIO-SWALE AND RETENTION POND
- 1** 500-GAL. USED OIL AST, CUSTOMER CORE DROP-OFF BIN, HAND WASH STATION
- 2** STACKED USED BATTERIES ON SPILL PALLETS, BATTERY CHARGING STATION, BAKING SODA CONTAINER, BATTERY RE-SALE AREA
- 3** CRUSHING SCRAP STORAGE, ENGINE DRAINAGE TABLES, (1) 55-GAL. GEAR LUBRICATION DRUM
- 4** (1) 6,000-GAL. RECOVERED GASOLINE AST, (2) 55-GAL. TRACTOR FLUID DRUMS, (1) 55-GAL. HYDRAULIC OIL DRUMS, (1) 55-GAL. ATF DRUM, (1) 55-GAL. GREASE DRUM
- 5** (4) DRAIN RACKS, (1) 500-GAL. USED ANTI-FREEZE AST, (1) 1,000-GAL. USED OIL AST, (1) 1,000-GAL. DIESEL AST, (1) 500-GAL. USED OIL AST, (4) 55-GAL. USED OIL DRUMS, (3) 55-GAL. USED BRAKE FLUID DRUMS (6) 55-GAL. AUTOMOTIVE WASTE OIL DRUMS
- 6** STORMWATER COLLECTION AREA, STORMWATER IS PUMPED INTO BIOSWALE FROM THIS LOCATION
- 7** STORMWATER OVERFLOW FROM THE RETENTION BASIN DISCHARGES INTO THE STRUCTURE AT OUTFALL 1 BEFORE DISCHARGING INTO THE MUNICIPAL MS4 STORMWATER SYSTEM
- 8** (7) 55-GAL. USED OIL DRUMS

- PROPERTY BOUNDARY
- DRAINAGE AREA 1
- DRAINAGE AREA 2

NOTE: SURFACE AREA NOT DESIGNATED AS PAVED OR VEGETATED IS COMPRISED OF COMPACTED DIRT AND CRUSHED STONE. THE ERODIBLE SURFACES AT THIS FACILITY ARE: COMPACTED DIRT AND CRUSHED STONE AREAS AND THE VEGETATED AREAS.



CHECK BY	DC
DRAWN BY	OS
DATE	11-7-23
SCALE	AS SHOWN
CAD NO.	LKQ001-0524036-23009659
PRJ NO.	LKQ001-0524036-23009659

SPCC SITE MAP

LKQ 1280 - PICK-A-PART AUTO WRECKING

2025 SOUTH MILLIKEN AVENUE, SUITE A

ONTARIO, CALIFORNIA



FIGURE

2

LEGEND

- DA-1** DRAINAGE AREA #1, FULLY BERMED AND CURBED ASPHALT/IMPERVIOUS, ALL INLETS DRAIN TO SEPARATOR PRIOR TO OFFSITE DRAINAGE
- DA-2** DRAINAGE AREA #2, GRAVEL/PERVIOUS, SHEET-FLOWS TO MORMON SLOUGH, NO TANK STORAGE OR INDUSTRIAL ACTIVITY IN THIS AREA. EMPLOYEE PARKING ONLY.
-  VEHICLE/PARTS WASH, FULLY BERMED/CURBED, WASH WATER CONTAINED IN UNDERGROUND STORAGE TANK.
-  STORMWATER FLOW DIRECTION
-  SPILL KIT
-  STORMWATER INLETS (11)
-  INTERCEPTOR MANHOLES (5)
-  SAMPLING LOCATION (FROM WITHIN LAST CHAMBER OF SEPARATOR/INTERCEPTOR)
-  55-GAL. USED ABSORBENT DRUM
55-GAL. WASTE OILY SLUDGE DRUM
55-GAL. USED ANTIFREEZE AST
-  55-GAL. USED ABSORBENT DRUM
(2) 55-GAL.. TRANSMISSION FLUID DRUMS
120-GAL. USED OIL AST
-  55-GAL. USED DEF
55-GAL. OILY ABSORBENT
-  ABOVEGROUND STORAGE TANK LOCATION (7)
-  CONTAINMENT TANK FOR PARTS/VEHICLE WASH AREA
-  PROPERTY BOUNDARY

SOUTH AIRPORT WAY

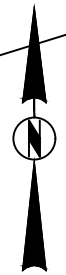
CHURCH

MORMON SLOUGH (SURFACE WATERBODY)

SOUTH SIERRA
NEVADA STREET

EAST ANDERSON STREET

SOUTH WILSON WAY



DA-1
VEHICLE
STORAGE
YARD
(ASPHALT)

HAZARDOUS MATERIAL
& WASTE HANDLING
STORAGE AREAS

STORAGE
CONTAINERS

NOT A
PART

500-GAL. USED
ANTI FREEZE AST
1,000-GAL.
DIESEL FUEL AST

WOOD
CANOPY

1,000-GAL.
WASTE OIL AST

USED BATTERIES

A9 - 55-GAL.
USED OIL AST

FLUID EVACUATION
BUILDING

A8 - 75-GAL.
DIESEL FUEL AST

PARTS WASHER
CANOPY

SAMPLING
LOCATION 1

TRUCK SHOP

DA-1

DA-1

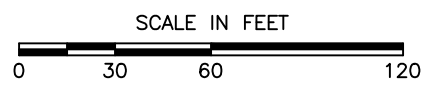
DA-2

DA-2

PARKING LOT
(DIRT/GRAVEL)

MUNICIPAL
STORM
INLET

120-GAL. TRANSMISSION FLUID AST
120-GAL. GEAR OIL AST
120-GAL. HYDRAULIC FLUID AST
120-GAL. ENGINE OIL AST



CHECK BY	DC
DRAWN BY	OS
DATE	8-29-23
SCALE	AS SHOWN
CAD NO.	LKQ001-0524036-23009226
PRJ NO.	LKQ001-0524036-23009226

SITE LAYOUT DIAGRAM

LKQ-ACME TRUCK PARTS
1049 SOUTH WILSON WAY
STOCKTON, CALIFORNIA



FIGURE

2

CONSOLIDATED LEVEL 1 EXCEEDANCE RESPONSE ACTION (ERA) REPORT (Fe)

For

LKQ Corporation
1800 – Redding, 1291 – San Bernadino,
1292 – Hesperia & 1711 – Adelanto

Compliance Group Leader (CGL)

Timothy Klein
LKQ Corporation
7411 Goen Place, Suite B
San Diego, CA 92120
(858) 997-4939

Level 1 ERA Prepared by:

Apex Companies, LLC
5355 Avenida Encinas, Suite 107
Carlsbad, CA 92008

Level 1 ERA Preparation Date

December 2023

Table of Contents

Introduction.....	1
1.0 Facility Information	1
2.0 QISP Information.....	2
3.0 Summary of Numeric Action Level (NAL) Exceedances	3
4.0 SWPPP Review.....	3
5.0 Evaluation/Identification of Potential Pollutant Sources.....	4
6.0 Minimum BMP Evaluation	4
7.0 Advanced BMPs.....	5
8.0 Additional BMPs Selected for Implementation.....	6
9.0 Modification to Existing Monitoring Implementation Program (MIP)	6
10.0 Evaluation and Report Completion/Submittal Information	6

Appendices

- A Summary of Stormwater Results
- B Site Maps

Facility Name:	LKQ – Midnight Truck and Auto Recyclers (1291)
Waste Discharge Identification (WDID):	8 36I023433
Date Entered Level 1 Status:	July 1, 2017
Facility Name:	LKQ Pick Your Part – Hesperia (1292)
Waste Discharge Identification (WDID):	6B36I023434
Date Entered Level 1 Status:	July 1, 2018
Facility Name:	LKQ Lakenor Auto Truck Salvage, Inc. (1711)
Waste Discharge Identification (WDID):	6B36I025934
Date Entered Level 1 Status:	July 1, 2020
Facility Name:	LKQ – Select Auto and Truck Recyclers - Redding (1800)
Waste Discharge Identification (WDID):	5R45I024352
Date Entered Level 1 Status:	July 1, 2023

"I certify under penalty of law that this document and all Attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, to the best of my knowledge and belief, the information submitted is, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Timothy Klein

*Compliance Group Leader (CGL) / Duly Authorized
Representative (DAR)*

Tim Klein

Signature of CGL / DAR

12-14-23

Date

Introduction

California's National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Industrial Activity – Order 2014-0057-DWQ (General Permit) requires a Level 1 Exceedance Response Action (ERA) Evaluation and Report to be developed if there are Numeric Action Level (NAL) exceedances as defined in the Industrial General Permit (IGP). This report identifies potential industrial activities that may have contributed to pollutant concentrations above the NALs during the 2022-2023 reporting year. This Level 1 ERA Report describes the Best Management Practices (BMPs) and revisions to the facility's Storm Water Pollution Prevention Plan (SWPPP) to reduce pollutant concentrations in storm water runoff. This report was prepared in accordance with the requirements of the IGP.

The LKQ Corporation Stormwater Compliance Group was formed to create a group of dischargers with similar industrial activities, pollutant sources, and pollutant characteristics and to share knowledge and implementation of BMPs to reduce those pollutants at each site. This Consolidated ERA Level 1 Evaluation and Report (Consolidated Report) for Total Iron (Fe) Exceedances was prepared by the Compliance Group Leader (CGL), Timothy Klein, QISP and ToR #901. The Level 1 ERA assessment was conducted during 2023 in conjunction with the Annual Site Compliance Evaluation site visit. For the Compliance Group, in accordance with Section XIV.B.3 of the Permit, "A Compliance Group Leader shall prepare a Consolidated Level 1 ERA Report for all Compliance Group participants with Level 1 status for the same parameter. Compliance Group participants who certify and submit these Consolidated Level 1 ERA Reports are subject to the same provisions as individual Dischargers with Level 1 status, as described in Section XII.C. A Consolidated Level 1 ERA Report is equivalent to a Level 1 ERA Report."

1.0 Facility Information

The primary function at the LKQ Corporation participant sites consists of automotive dismantling and parts recycling. One site in the LKQ Corporation Stormwater Group was identified in the Water Board's Storm Water Multiple Application and Report Tracking System (SMARTS) as moving from baseline status to Level 1 status for Fe Annual Average exceedances compared with the NAL identified in the Permit during the 2022-2023 reporting year. The participant sites are listed in the following table, which includes participant sites that were already in Level 1 for Fe prior to the 2022-2023 reporting year.

Facility Name	LKQ – Midnight Truck and Auto Recyclers (1291)
Address	434 East 6 th Street, San Bernadino, CA 92410
WDID	8 36I023433
SIC Code(s)	5015
Designated LRP	Esteban Viramontes
Phone Number	909-663-8433
E-mail Address	exviramontes@lkqcorp.com

Facility Name	LKQ Pick Your Part – Hesperia (1292)
Address	11399 Santa Fe Avenue East, Hesperia, CA 92345
WDID	6B 36I023434
SIC Code(s)	5015
Designated LRP	Angel Gutierrez
Phone Number	760-275-5077
E-mail Address	axgutierrez@LKQCORP.com
Facility Name	LKQ Lakenor Auto Truck Salvage, Inc. (1711)
Address	11200 Alden Road, Adelanto, CA 92301
WDID	6B36I025934
SIC Code(s)	5015
Designated LRP	Nicky Castillo
Phone Number	209-345-0204
E-mail Address	nidcastillo@LKQCORP.com
Facility Name	LKQ – Select Auto and Truck Recyclers - Redding (1800)
Address	19895 Viking Way, Redding, CA 96003
WDID	5R45I024352
SIC Code(s)	5015
Designated LRP	Jesse Oster
Phone Number	530-356-7216
E-mail Address	JSOster@lkqcorp.com

2.0 QISP Information

The IGP requires the discharger to enlist the services of a Qualified Industrial Stormwater Practitioner (QISP) to assist with the ERA Level 1 Evaluation and prepare the ERA Level 1 Report. Information related to the QISP assisting with this evaluation and report are included below.

Name: Timothy Klein

QISP/Tor Cert. Number: 00901

Affiliation: LKQ Corporation

Phone Number: 858-997-4939

E-mail Address: taklein@lkqcorp.com

Scope of Services Provided: ERA Level 1 Evaluation and Report

3.0 Summary of Numeric Action Level (NAL) Exceedances

The following table summarizes the NAL exceedance(s) being addressed in this Level 1 ERA Evaluation and Report.

Site	Parameter Exceeded ¹	2022-2023 Annual NAL Exceedance	Data Summary Used to Calculate Annual Average NAL Exceedance		
			# of Samples	Sum of Results	Discharge Point(s)
1800	Fe	1.31 mg/L	4	5.236 mg/L	Outfall 1 Outfall 2

¹NAL exceedances summarized in this table are consistent with SMARTS.

4.0 SWPPP Review

The SWPPPs were reviewed to assess compliance with requirements outlined in Section X of the IGP. This review includes all sections of the SWPPPs, including the site map, monitoring implementation plan, potential pollutant generating activities, and BMP selection and implementation. The table below summarizes the review.

Site	SWPPP (General Permit Section)	SWPPP Page # or Reference Location	Date Implemented or Last Revised	Comments
1800	Stormwater BMPs (Section X.H)	§3.0 Site Map	November 2022	Section 3.0 of the SWPPP and the Site Map will be updated to include the additional Level 1 ERA BMPs listed in this report.

5.0 Evaluation/Identification of Potential Pollutant Sources

Pollutant source evaluation for each parameter exceeding an NAL are summarized in **Section 3.0** above. Findings related to the evaluation are summarized below.

Parameter Exceeded	Potential Source/Activity Generating Exceedance	Likely Source	Existing BMPs to Address the Source
Total Iron	- Naturally occurring metals are found within soil at the site; - The inventory of vehicles being held in storage throughout the yard; - Automotive crushing and scrap activities; - On-site structures, equipment, and fencing; - Airborne dust and particulate deposition from on- and off-site locations.	- Industrial - Natural Background	- Employee training - Good housekeeping - Preventative maintenance - Material handling and waste management - Spill and leak prevention and response - Erosion and sediment control - Overhead cover - Bioswales - Dust control - Retention basins - Triton filters - Work conducted indoors when possible

Based on the evaluation, is additional investigation and/or monitoring necessary to identify the potential pollutants source(s)? ☐ Yes ☒ No

If yes, document the specific parameter and the additional investigation/monitoring needed to establish the pollutant source in the table below.

Parameter	Additional Investigation/Monitoring	Goal/Objective
N/A	N/A	N/A

6.0 Minimum BMP Evaluation

An evaluation of the Minimum BMPs (IGP Section X.H.1) included in the SWPPP was performed to assess if adequately implemented at the site, particularly for those areas identified as potential pollutant sources in **Section 5.0** of this report. Minimum BMP deficiencies are identified in the table below.

Site	Deficiency Noted
1800	A moderate amount of trash and sediment was observed accumulating near Outfalls 1- 4.
	Minor to moderate amounts of car parts were observed on the ground in the Vehicle Storage Yard and in the swale that runs north of Outfall 3.
	Vehicle crushing is reportedly conducted on soil.
	Dirt and car parts were observed in the stormwater swale in Drainage Area 2.
	Sediment and trash were observed accumulating in a storm inlet.
1291	Minor to moderate amounts of car parts observed in the Retail Lots.
	Minor to moderate amounts of staining observed throughout the facility.
	Some staining was observed near the Outfall 2.

Site	Deficiency Noted
	Two drums were observed outside the bermed area.
1292	A drainage table near the Dismantling Area was observed with significant staining on the ground.
	Moderate amounts of spills and staining observed in the Dismantling / Fluid Draining Area.
	Minor to moderate to amount of car parts were observed on the ground in the yard from day-to-day operations.
	A gasoline tank was observed with significant staining on the exterior of the tank and outside the containment was observed.
1711	Moderate amounts of trash, sediment, and debris observed around the stormwater drain inlets on the east side of the site.
	Significant amounts of sediment surround the drain inlets in the north side of the main building.
	Moderate amounts of trash and parts were observed near the outfall.
	Moderate amounts of spills and staining observed on the ground in the west side of the Dismantling Area.
	Moderate amounts of car parts were observed throughout the yard due to day-to-day operations.
	A degreaser tote was observed located within a few feet of an open door without secondary containment.
	Moderate amounts of water and sediment from the parts washer was observed leaking into the secondary containment of the propane tank.

7.0 Advanced BMPs

An evaluation of any Advanced BMPs (IGP Section X.H.2) was performed to assess if adequately implemented at the site. Advanced BMPs deficiencies are identified in the table below.

Site	Deficiency Noted
1800	Straw wattle was observed misplaced and/or dirty at Outfalls 2-4.
1291	Vegetation in the retention basins and swales were observed overgrown and in need of maintenance.
1292	Pond was observed with overgrown vegetation near the Welding Area.
	Minor amounts of trash were observed at the basin near Outfall 3.
	Tires and debris were observed accumulating in the basin in the Retail Sales Yard.
1711	Significant amounts of materials were stored around the detention basin.

8.0 Additional BMPs Selected for Implementation

Based on the pollutant source evaluation and evaluation of existing BMPs implemented at the site, the following additional BMPs or improvements to existing BMPs will be implemented to control pollutants generated from on-site industrial activities. Sections of the SWPPP will be revised to reflect the additional BMPs identified below.

Parameter Exceeded	Additional BMP(s) Implemented to Address Exceedance	Site	Date Implemented or Schedule for Implementation	SWPPP Section
Total Iron	Install Filtrexx Metaloxx at outfalls in addition to existing metal/oil booms	1800	September-November 2023	Section 3.0 Site Map
	Hydraulic Study	1800	September-November 2023	

9.0 Modification to Existing Monitoring Implementation Program (MIP)

The following are changes or modifications made to the monitoring program, if any, in response to this evaluation. Modifications could be related to monitoring locations, sampling methodology, sampling frequency, and analytical parameters. Goals/objectives of monitoring program changes and how they relate to potential BMP improvements are listed below.

Additional Investigation(s)/Modification(s)	Goal/Objective
N/A	N/A

10.0 Evaluation and Report Completion/Submittal Information

Date ERA Level 1 Evaluation Completed: 1800 4/25/2023

Date BMP Implementation Complete: September-November 2023

Date ERA Level 1 Report Certified and Submitted: 12/14/2023

APPENDIX A

Summary of Stormwater Results

2022-2023 Summary of Stormwater Discharge Sampling Results
LKQ Select Auto and Truck Recyclers 1800
19895 Viking Way
Redding, California

Constituents		pH	TSS	O&G	Al	Cu	Fe	Pb	Zn
Unit		pH units	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Permit Limits	Instantaneous Maximum NAL	6.0-9.0	400	25	NA				
	Annual NAL	NA	100	15	0.75	0.0332	1.0	0.262	0.26
Sample Date	Location(s)								
1-Dec-2022	Outfall 1	7.8	38.0	ND<0.516	1.20	0.0157	1.90	0.00283	0.0364
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	Outfall 2	7.9	7.80	ND<0.494	0.174	0.00390	0.196	0.000612	0.0242

Annual Average: **NA** **25.7** **0.25** **0.819** **0.0126** **1.31** **0.00223** **0.0359**

Notes: TSS - Total Suspended Solids
O&G - Oil and grease
Al - Aluminum
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Fe - Iron
Pb - Lead

Zn - Zinc
NA - Not available; not analyzed
mg/L - milligrams per liter
NAL - Numeric Action Level
200 Results reported at or above (outside) the NAL

APPENDIX B

Site Maps

**CONSOLIDATED LEVEL 1 EXCEEDANCE RESPONSE
ACTION (ERA) REPORT
(Pb)**

For

LKQ Corporation
1268 – Stanton, 1289 – Thousand Palms & 1711 – Adelanto

Compliance Group Leader (CGL)

Timothy Klein
LKQ Corporation
7411 Goen Place, Suite B
San Diego, CA 92120
(858) 997-4939

Level 1 ERA Prepared by:

Apex Companies, LLC
5355 Avenida Encinas, Suite 107
Carlsbad, CA 92008

Level 1 ERA Preparation Date

December 2023

Table of Contents

Introduction.....	1
1.0 Facility Information	1
2.0 QISP Information.....	2
3.0 Summary of Numeric Action Level (NAL) Exceedances	3
4.0 SWPPP Review.....	3
5.0 Evaluation/Identification of Potential Pollutant Sources.....	4
6.0 Minimum BMP Evaluation	4
7.0 Advanced BMPs.....	5
8.0 Additional BMPs Selected for Implementation.....	6
9.0 Modification to Existing Monitoring Implementation Program (MIP)	6
10.0 Evaluation and Report Completion/Submittal Information	6

Appendices

- A Summary of Stormwater Results
- B Site Maps

Facility Name:	LKQ – Pick Your Part Auto Wrecking - Stanton (1268)
Waste Discharge Identification (WDID):	8 30I018886
Date Entered Level 1 Status:	July 1, 2023
Facility Name:	LKQ – Pick Your Part, Thousand Palms (1289)
Waste Discharge Identification (WDID):	7 33I025935
Date Entered Level 1 Status:	July 1, 2018
Facility Name:	LKQ Lakenor Auto Truck Salvage, Inc. (1711)
Waste Discharge Identification (WDID):	6B36I025934
Date Entered Level 1 Status:	July 1, 2020

"I certify under penalty of law that this document and all Attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, to the best of my knowledge and belief, the information submitted is, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Timothy Klein

*Compliance Group Leader (CGL) / Duly Authorized
Representative (DAR)*

Tim Klein

Signature of CGL / DAR

12-14-23

Date

Introduction

California's National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Industrial Activity – Order 2014-0057-DWQ (General Permit) requires a Level 1 Exceedance Response Action (ERA) Evaluation and Report to be developed if there are Numeric Action Level (NAL) exceedances as defined in the Industrial General Permit (IGP). This report identifies potential industrial activities that may have contributed to pollutant concentrations above the NALs during the 2022-2023 reporting year. This Level 1 ERA Report describes the Best Management Practices (BMPs) and revisions to the facility's Storm Water Pollution Prevention Plan (SWPPP) to reduce pollutant concentrations in storm water runoff. This report was prepared in accordance with the requirements of the IGP.

The LKQ Corporation Stormwater Compliance Group was formed to create a group of dischargers with similar industrial activities, pollutant sources, and pollutant characteristics and to share knowledge and implementation of BMPs to reduce those pollutants at each site. This Consolidated ERA Level 1 Evaluation and Report (Consolidated Report) for Total Lead (Pb) Exceedances was prepared by the Compliance Group Leader (CGL), Timothy Klein, QISP and ToR #901. The Level 1 ERA assessment was conducted during 2023 in conjunction with the Annual Site Compliance Evaluation site visit. For the Compliance Group, in accordance with Section XIV.B.3 of the Permit, "A Compliance Group Leader shall prepare a Consolidated Level 1 ERA Report for all Compliance Group participants with Level 1 status for the same parameter. Compliance Group participants who certify and submit these Consolidated Level 1 ERA Reports are subject to the same provisions as individual Dischargers with Level 1 status, as described in Section XII.C. A Consolidated Level 1 ERA Report is equivalent to a Level 1 ERA Report."

1.0 Facility Information

The primary function at the LKQ Corporation participant sites consists of automotive dismantling and parts recycling. One site in the LKQ Corporation Stormwater Group was identified in the Water Board's Storm Water Multiple Application and Report Tracking System (SMARTS) as moving from baseline status to Level 1 status for Pb Annual Average exceedances compared with the NAL identified in the Permit during the 2022-2023 reporting year. The participant sites are listed in the following table, which includes participant sites that were already in Level 1 for Pb prior to the 2022-2023 reporting year.

Facility Name	LKQ – Pick Your Part Auto Wrecking - Stanton (1268)
Address	8188 Katella Avenue, Stanton, CA 90608
WDID	8 30I018886
SIC Code(s)	5015
Designated LRP	Fernando Guerra
Phone Number	310-345-7351
E-mail Address	fxguerra@lkqcorp.com

Facility Name	LKQ – Pick Your Part, Thousand Palms (1289)
Address	27600 North Sierra Del Sol Road, Thousand Palms, CA 92276
WDID	7 331025935
SIC Code(s)	5015
Designated LRP	Veronica Chavez
Phone Number	442-262-7489
E-mail Address	vxchavez@LKQCORP.com
Facility Name	LKQ Lakenor Auto Truck Salvage, Inc. (1711)
Address	11200 Alden Road, Adelanto, CA 92301
WDID	6B361025934
SIC Code(s)	5015
Designated LRP	Nicky Castillo
Phone Number	209-345-0204
E-mail Address	nidcastillo@LKQCORP.com

2.0 QISP Information

The IGP requires the discharger to enlist the services of a Qualified Industrial Stormwater Practitioner (QISP) to assist with the ERA Level 1 Evaluation and prepare the ERA Level 1 Report. Information related to the QISP assisting with this evaluation and report are included below.

Name: Timothy Klein

QISP/Tor Cert. Number: 00901

Affiliation: LKQ Corporation

Phone Number: 858-997-4939

E-mail Address: taklein@lkqcorp.com

Scope of Services Provided: ERA Level 1 Evaluation and Report

3.0 Summary of Numeric Action Level (NAL) Exceedances

The following table summarizes the NAL exceedance(s) being addressed in this Level 1 ERA Evaluation and Report.

Site	Parameter Exceeded ¹	2022-2023 Annual NAL Exceedance	Data Summary Used to Calculate Annual Average NAL Exceedance		
			# of Samples	Sum of Results	Discharge Point(s)
1268	Pb	0.560 mg/L	8	4.481 mg/L	Outfall 1 Outfall 2

¹NAL exceedances summarized in this table are consistent with SMARTS.

4.0 SWPPP Review

The SWPPPs were reviewed to assess compliance with requirements outlined in Section X of the IGP. This review includes all sections of the SWPPPs, including the site map, monitoring implementation plan, potential pollutant generating activities, and BMP selection and implementation. The table below summarizes the review.

Site	SWPPP (General Permit Section)	SWPPP Page # or Reference Location	Date Implemented or Last Revised	Comments
1268	Stormwater BMPs (Section X.H)	§3.0 Site Map	December 2021	Section 3.0 of the SWPPP and the Site Map will be updated to include the additional Level 1 ERA BMPs listed in this report.

5.0 Evaluation/Identification of Potential Pollutant Sources

Pollutant source evaluation for each parameter exceeding an NAL are summarized in **Section 3.0** above. Findings related to the evaluation are summarized below.

Parameter Exceeded	Potential Source/Activity Generating Exceedance	Likely Source	Existing BMPs to Address the Source
Total Lead	- Naturally occurring metals are found within soil at the site; - The inventory of vehicles being held in storage throughout the yard; - Exposed and/or oxidized metal features, including perimeter fencing, awnings, containers, and buildings. - Airborne dust and particulate deposition from on- and off-site locations. - Extensive run-on from the undeveloped hillside adjacent to the facilities is laden with sediment and naturally occurring metals. Eroded channels/rills are prevalent on the slope immediately up-gradient of the facilities.	- Industrial - Natural Background	- Employee training - Good housekeeping - Preventative maintenance - Material handling and waste management - Spill and leak prevention and response - Erosion and sediment control - Overhead cover - Gravel swales - Dust control - Retention ponds - Work conducted indoors when possible

Based on the evaluation, is additional investigation and/or monitoring necessary to identify the potential pollutants source(s)? ☐ Yes ☒ No

If yes, document the specific parameter and the additional investigation/monitoring needed to establish the pollutant source in the table below.

Parameter	Additional Investigation/Monitoring	Goal/Objective
N/A	N/A	N/A

6.0 Minimum BMP Evaluation

An evaluation of the Minimum BMPs (IGP Section X.H.1) included in the SWPPP was performed to assess if adequately implemented at the site, particularly for those areas identified as potential pollutant sources in **Section 5.0** of this report. Minimum BMP deficiencies are identified in the following table.

Site	Deficiency Noted
1268	A moderate amount of staining was observed on the bare soil located within the Compacter/Logger Area.
	Apex observed moderate amount of car parts on floor due to crushing operations.
	Minor amount of tires and car parts were observed on the ground in the Retail Sales Yard due to daily operations.
	Crushing operations are being conducted on bare soil.
	Not all locations as described in Table 3-4 of the SWPPP are being inspected in their monthly storm water investigations.
1289	A minor amount of staining was observed on the ground at the Fluid Draining and Hazardous Waste Accumulation Area.
	A minor amount of car parts was observed on the ground throughout the Vehicle Storage Area and near the crusher.
	Vehicle crushing is currently conducted on soil.
	Multiple containers were observed missing a form of secondary containment. The 500-gal Red Dyed Diesel AST was observed with a significant amount of rims within the tank's bermed area. The berm was also observed broken.
	Monthly stormwater visual observation inspections were not observed completed since June 2022.
	Monthly drum/tank inspections were not observed completed since June 2022.
	The last annual SWPPP/SPCC training occurred on 05/26/2022 and so the current LRP has not yet received annual training.
1711	Moderate amounts of trash, sediment, and debris observed around the stormwater drain inlets on the east side of the site.
	Significant amounts of sediment surround the drain inlets in the north side of the main building.
	Moderate amounts of trash and parts were observed near the outfall.
	Moderate amounts of spills and staining observed on the ground in the west side of the Dismantling Area.
	Moderate amounts of car parts were observed throughout the yard due to day-to-day operations.
	A degreaser tote was observed located within a few feet of an open door without secondary containment.
	Moderate amounts of water and sediment from the parts washer was observed leaking into the secondary containment of the propane tank.

7.0 Advanced BMPs

An evaluation of any Advanced BMPs (IGP Section X.H.2) was performed to assess if adequately implemented at the site. Advanced BMPs deficiencies are identified in the table below.

Site	Deficiency Noted
1268	Overgrown vegetation was observed in the retention basin at Outfall 2.
1289	Minor to moderate amounts of trash were observed accumulating near the gravel swale upstream of Outfall 1.
1711	Significant amounts of materials were stored around the detention basin.

8.0 Additional BMPs Selected for Implementation

Based on the pollutant source evaluation and evaluation of existing BMPs implemented at the site, the following additional BMPs or improvements to existing BMPs will be implemented to control pollutants generated from on-site industrial activities. Sections of the SWPPP will be revised to reflect the additional BMPs identified below.

Parameter Exceeded	Additional BMP(s) Implemented to Address Exceedance	Site	Date Implemented or Schedule for Implementation	SWPPP Section
Total Lead	Install Filtrexx Metaloxx at outfalls in addition to existing metal/oil booms.	1268	10/1/2023	Section 3.0 Site Map
	Increase housekeeping prior to forecasted rain events.	1268	10/1/2023	

9.0 Modification to Existing Monitoring Implementation Program (MIP)

The following are changes or modifications made to the monitoring program, if any, in response to this evaluation. Modifications could be related to monitoring locations, sampling methodology, sampling frequency, and analytical parameters. Goals/objectives of monitoring program changes and how they relate to potential BMP improvements are listed below.

Additional Investigation(s)/Modification(s)	Goal/Objective
N/A	N/A

10.0 Evaluation and Report Completion/Submittal Information

Date ERA Level 1 Evaluation Completed: 1268 4/28/2023
Date BMP Implementation Complete: 10/1/2023
Date ERA Level 1 Report Certified and Submitted: 12/14/2023

APPENDIX A

Summary of Stormwater Results

2022-2023 Summary of Stormwater Discharge Sampling Results

LKQ Pick Your Part 1268

8188 Katella Avenue

Stanton, California

Constituents		pH	TSS	O&G	Al	Cu	Fe	Pb	Zn
Unit		pH units	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Permit Limits	Instantaneous Maximum NAL	6.0-9.0	400	25	NA				
	Annual NAL	NA	100	15	0.75	0.0332	1.0	0.262	0.26
Sample Date	Location(s)								
8-Nov-2022	Outfall 1	NA	313	23.1	11.6	0.292	12.4	0.304	0.859
	Outfall 2	NA	390	14.9	13.8	0.322	17.2	0.485	1.130
5-Jan-2023	Outfall 1	7.0	600	4.73	20.8	0.354	25.5	0.611	1.870
	Outfall 2	5.0	452	16.7	17.7	0.358	25.6	0.766	1.900
10-Jan-2023	Outfall 1	4.0	36.0	8.45	1.28	0.0679	1.4	0.0425	0.194
	Outfall 2	4.0	720	4.93	20.5	0.445	25.0	0.932	2.13
21-Mar-2023	Outfall 1	6.0	166	8.76	7.01	0.149	11.4	0.270	0.717
	Outfall 2	7.0	880	4.15	22.3	0.476	35.4	1.07	2.45

Annual Average: NA 445 10.7 14.37 0.3080 19.2 0.560 1.406

Notes: TSS - Total Suspended Solids

O&G - Oil and grease

Al - Aluminum

Cu - Copper

Fe - Iron

Pb - Lead

Zn - Zinc

NA - Not available; not analyzed

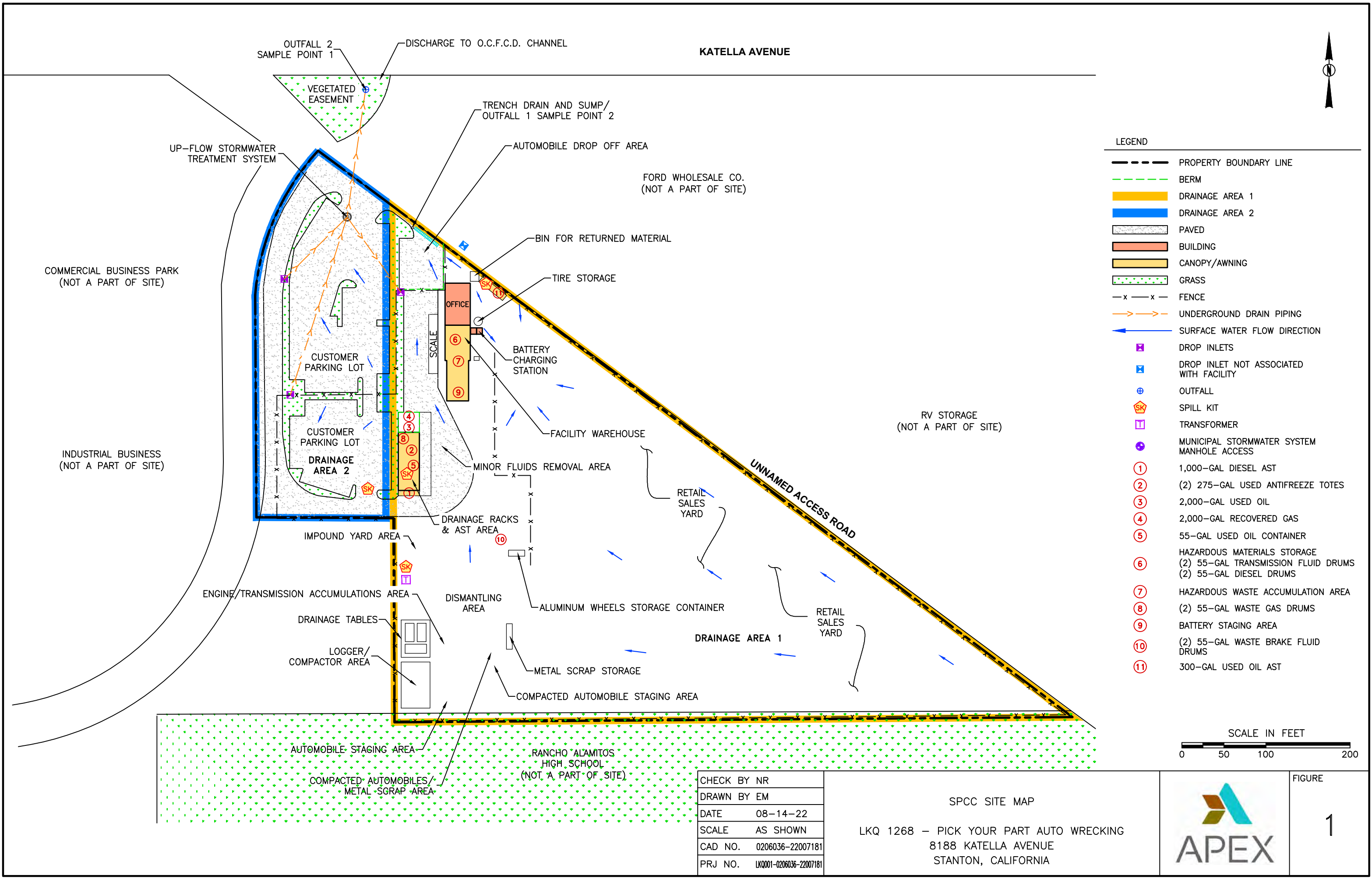
mg/L - milligrams per liter

NAL - Numeric Action Level

Results reported at or above (outside) the NAL

APPENDIX B

Site Maps



KATELLA AVENUE



LEGEND

- PROPERTY BOUNDARY LINE
- - - BERM
- DRAINAGE AREA 1
- DRAINAGE AREA 2
- PAVED
- BUILDING
- CANOPY/AWNING
- GRASS
- x - x - FENCE
- >->- UNDERGROUND DRAIN PIPING
- SURFACE WATER FLOW DIRECTION
- DROP INLETS
- DROP INLET NOT ASSOCIATED WITH FACILITY
- OUTFALL
- SPILL KIT
- TRANSFORMER
- MUNICIPAL STORMWATER SYSTEM MANHOLE ACCESS
- 1 1,000-GAL DIESEL AST
- 2 (2) 275-GAL USED ANTIFREEZE TOTES
- 3 2,000-GAL USED OIL
- 4 2,000-GAL RECOVERED GAS
- 5 55-GAL USED OIL CONTAINER
- 6 HAZARDOUS MATERIALS STORAGE (2) 55-GAL TRANSMISSION FLUID DRUMS (2) 55-GAL DIESEL DRUMS
- 7 HAZARDOUS WASTE ACCUMULATION AREA
- 8 (2) 55-GAL WASTE GAS DRUMS
- 9 BATTERY STAGING AREA
- 10 (2) 55-GAL WASTE BRAKE FLUID DRUMS
- 11 300-GAL USED OIL AST

SCALE IN FEET
0 50 100 200

CHECK BY	NR
DRAWN BY	EM
DATE	08-14-22
SCALE	AS SHOWN
CAD NO.	0206036-22007181
PRJ NO.	LK001-0206036-22007181

SPCC SITE MAP
LKQ 1268 - PICK YOUR PART AUTO WRECKING
8188 KATELLA AVENUE
STANTON, CALIFORNIA



FIGURE
1

CONSOLIDATED LEVEL 1 EXCEEDANCE RESPONSE ACTION (ERA) REPORT (Cu)

For

LKQ Corporation
1263 – Sun Valley, 1289 – Thousand Palms,
1290 – Riverside, 1711 – Adelanto & 1820A - Stockton

Compliance Group Leader (CGL)

Timothy Klein
LKQ Corporation
7411 Goen Place, Suite B
San Diego, CA 92120
(858) 997-4939

Level 1 ERA Prepared by:

Apex Companies, LLC
5355 Avenida Encinas, Suite 107
Carlsbad, CA 92008

Level 1 ERA Preparation Date

February 2024

Table of Contents

Introduction	1
1.0 Facility Information	1
2.0 QISP Information.....	3
3.0 Summary of Numeric Action Level (NAL) Exceedances	3
4.0 SWPPP Review	3
5.0 Evaluation/Identification of Potential Pollutant Sources.....	4
6.0 Minimum BMP Evaluation	5
7.0 Advanced BMPs.....	5
8.0 Additional BMPs Selected for Implementation.....	6
9.0 Modification to Existing Monitoring Implementation Program (MIP)	7
10.0 Evaluation and Report Completion/Submittal Information	7

Appendices

- A Summary of Stormwater Results
- B Site Maps

Facility Name:	LKQ – Pick Your Part #1263
Waste Discharge Identification (WDID):	4 19I005132
Date Entered Level 1 Status:	July 1, 2020
Facility Name:	LKQ – Pick Your Part, Thousand Palms #1289
Waste Discharge Identification (WDID):	7 33I025935
Date Entered Level 1 Status:	July 1, 2019
Facility Name:	LKQ – Pick Your Part #1290
Waste Discharge Identification (WDID):	8 33I023435
Date Entered Level 1 Status:	July 1, 2019
Facility Name:	LKQ Lakenor Auto Truck Salvage, Inc. #1711
Waste Discharge Identification (WDID):	6B36I025414
Date Entered Level 1 Status:	July 1, 2018
Facility Name:	LKQ – Acme Truck Parts #1820-A
Waste Discharge Identification (WDID):	5S39I023389
Date Entered Level 1 Status:	July 1, 2022

"I certify under penalty of law that this document and all Attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, to the best of my knowledge and belief, the information submitted is, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Timothy Klein

*Compliance Group Leader (CGL) / Duly Authorized
Representative (DAR)*

Tim Klein

Signature of CGL / DAR

2-23-24

Date

Introduction

California's National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Industrial Activity – Order 2014-0057-DWQ (General Permit) requires a Level 1 Exceedance Response Action (ERA) Evaluation and Report to be developed if there are Numeric Action Level (NAL) Exceedances as defined in the Industrial General Permit (IGP). This report identifies potential industrial activities that may have contributed to pollutant concentrations above the NALs during the 2017-2018, 2018-2019, 2019-2020, and 2021-2022 reporting years. This Level 1 ERA Report describes the Best Management Practices (BMPs) and revisions to the facility's Storm Water Pollution Prevention Plan (SWPPP) to reduce pollutant concentrations in storm water runoff. This report was prepared in accordance with the requirements of the IGP.

The LKQ Corporation Stormwater Compliance Group was formed to create a group of dischargers with similar industrial activities, pollutant sources, and pollutant characteristics and to share knowledge and implementation of BMPs to reduce those pollutants at each site. This Consolidated ERA Level 1 Evaluation and Report (Consolidated Report) for Total Copper (Cu) Exceedances was prepared by the Compliance Group Leader (CGL), Timothy Klein, QISP and ToR #901. The Level 1 ERA assessments were conducted during 2018, 2019, 2020, and 2022. For the Compliance Group, in accordance with Section XIV.B.3 of the Permit, "A Compliance Group Leader shall prepare a Consolidated Level 1 ERA Report for all Compliance Group participants with Level 1 status for the same parameter. Compliance Group participants who certify and submit these Consolidated Level 1 ERA Reports are subject to the same provisions as individual Dischargers with Level 1 status, as described in Section XII.C. A Consolidated Level 1 ERA Report is equivalent to a Level 1 ERA Report."

1.0 Facility Information

The primary function at the LKQ Corporation participant sites consists of automotive dismantling and parts recycling. One site in the LKQ Corporation Stormwater Group was identified in the Water Board's Storm Water Multiple Application and Report Tracking System (SMARTS) as moving from baseline status to Level 1 status for Cu Annual Average Exceedances compared with the NALs identified in the permit during the 2021-2022 reporting year. The participant sites are listed in the following table, which includes participant sites that were already in Level 1 for Cu prior to the 2021-2022 reporting year.

Facility Name	LKQ – Pick Your Part #1263
Address	9228 Tujunga Avenue, Sun Valley, CA 91325
WDID	4 19I005132
SIC Code(s)	5015
Designated LRP	Adrian Fernandez
Phone Number	(714) 231-4601
E-mail Address	axfernandez@LKQCORP.com

Facility Name	LKQ – Pick Your Part, Thousand Palms #1289
Address	27600 N. Sierra Del Sol Road, Thousand Palms, CA 92276
WDID	7 331025935
SIC Code(s)	5015
Designated LRP	Veronica Chavez
Phone Number	(442) 262-7489
E-mail Address	vxchavez@LKQCORP.com
Facility Name	LKQ – Pick Your Part #1290
Address	3760 Pyrite Street, Jurupa Valley, CA 92509
WDID	8 331023435
SIC Code(s)	5015
Designated LRP	Veronica Chavez
Phone Number	(442) 262-7489
E-mail Address	vxchavez@LKQCORP.com
Facility Name	LKQ Lakenor Auto Truck Salvage, Inc. #1711
Address	11200 Alden Road, Adelanto, CA 92301,
WDID	6B361025934
SIC Code(s)	5015
Designated LRP	Nick Castillo
Phone Number	(209) 345-0204
E-mail Address	nidcastillo@LKQCORP.com
Facility Name	LKQ – Acme Truck Parts #1820-A
Address	1016 South Wilson Way, Stockton, CA 95205
WDID	5S391023389
SIC Code(s)	5015
Designated LRP	Johnny Farah
Phone Number	415-525-2282
E-mail Address	jfarah@lkqcorp.com

2.0 QISP Information

The IGP requires the discharger to enlist the services of a Qualified Industrial Stormwater Practitioner (QISP) to assist with the ERA Level 1 Evaluation and prepare the ERA Level 1 Report. Information related to the QISP assisting with this evaluation and report are included below.

Name: Timothy Klein
QISP/Tor Cert. Number: 00901
Affiliation: LKQ Corporation
Phone Number: 858-997-4939
E-mail Address: taklein@lkqcorp.com
Scope of Services Provided: ERA Level 1 Evaluation and Report

3.0 Summary of Numeric Action Level (NAL) Exceedances

The following table summarizes the NAL Exceedance(s) being addressed in this Level 1 ERA Evaluation and Report.

Site	Parameter Exceeded ¹	Reporting Year	Annual NAL Exceedance	Data Summary Used to Calculate Annual Average NAL Exceedance		
				# of Samples	Sum of Results	Discharge Point(s)
1263	Cu	2019-2020	0.0481 mg/L	1	0.0481 mg/L	Outfall F
1289		2018-2019	0.0574 mg/L	1	0.0574 mg/L	Outfall 1
1290		2018-2019	0.0521 mg/L	1	0.0521 mg/L	Outfall 1
1711		2017-2018	0.208 mg/L	1	0.208 mg/L	Outfall 1
1820-A		2021-2022	0.136 mg/L	1	0.136 mg/L	Outfall 001

¹NAL Exceedances summarized in this table are consistent with SMARTS.

4.0 SWPPP Review

The SWPPPs were reviewed to assess compliance with requirements outlined in Section X of the IGP. This review includes all sections of the SWPPPs, including the site map, monitoring implementation plan, potential pollutant generating activities, and BMP selection and implementation. The table below summarizes the review.

Site	SWPPP (General Permit Section)	SWPPP Page # or Reference Location	Date Implemented or Last Revised	Comments
1263	Stormwater BMPs (Section X.H)	§3.0	November 2023	Section 3.0 in each of the SWPPPs was updated to include the additional Level 1 ERA BMPs listed in this report.
1289			September 2023	
1290			December 2021	
1711			September 2023	
1820-A			November 2023	

5.0 Evaluation/Identification of Potential Pollutant Sources

Pollutant source evaluation for each parameter exceeding an NAL are summarized in **Section 3.0** above. Findings related to the evaluation are summarized below.

Parameter Exceeded	Potential Source/Activity Generating Exceedance	Likely Source	Existing BMPs to Address the Source
Total Copper	- Naturally occurring metals are found within soil at the site; - The inventory of vehicles being held in storage throughout the yard; - Automotive crushing and scrap activities; - On-site structures, equipment, and fencing; - Airborne dust and particulate deposition from on- and off-site locations.	- Industrial - Natural Background	- Employee training - Good housekeeping - Preventative maintenance - Material handling and waste management - Spill and leak prevention and response - Erosion and sediment control - Overhead cover - Storm water treatment systems - Dust control - Gravel swales - Vegetated swales - Retention basins - Work conducted indoors when possible

Based on the evaluation, is additional investigation and/or monitoring necessary to identify the potential pollutants source(s)? ☐ Yes ☒ No

If yes, document the specific parameter and the additional investigation/monitoring needed to establish the pollutant source in the table below.

Parameter	Additional Investigation/Monitoring	Goal/Objective
N/A	N/A	N/A

6.0 Minimum BMP Evaluation

An evaluation of the Minimum BMPs (IGP Section X.H.1) included in the SWPPP was performed to assess if adequately implemented at the site, particularly for those areas identified as potential pollutant sources in **Section 5.0** of this report. Minimum BMP deficiencies are identified in the table below.

Site	Deficiency Noted
1263	Staining observed on the ground throughout the facility.
	A moderate amount of parts was observed on the ground in the Retail Sales Yard.
1289	A minor amount of staining was observed on the ground at the Fluid Draining and Hazardous Waste Accumulation Area.
	A minor amount of car parts was observed on the ground throughout the Vehicle Storage Area and near the crusher.
	Vehicle crushing is currently conducted on soil.
	Multiple containers were observed missing a form of secondary containment. The 500-gal Red Dyed Diesel AST was observed with a significant amount of rims within the tank's bermed area. The berm was also observed broken.
	Monthly stormwater visual observation inspections were not observed completed since June 2022.
	The last annual SWPPP training occurred on 05/26/2022 and so the current LRP has not yet received annual training.
1290	Not all locations as described in Table 3-4 of the SWPPP are being inspected in their monthly storm water investigations.
	The SWPPP annual training was conducted, however, the new LRP was not present.
1711	Moderate amounts of trash, sediment, and debris observed around the stormwater drain inlets on the east side of the site.
	Significant amounts of sediment surround the drain inlets in the north side of the main building.
	Moderate amounts of trash and parts were observed near the outfall.
	Moderate amounts of spills and staining observed on the ground in the west side of the Dismantling Area.
	Moderate amounts of car parts were observed throughout the yard due to day-to-day operations.
	Moderate amounts of water and sediment from the parts washer was observed leaking into the secondary containment of the propane tank.
1820-A	Stains observed on the ground in the Shear and Covered Parts Storage Areas.

7.0 Advanced BMPs

An evaluation of any Advanced BMPs (IGP Section X.H.2) was performed to assess if adequately implemented at the site. Advanced BMPs deficiencies are identified in the table below.

Site	Deficiency Noted
1291	Vegetation in the retention basins and swales were observed overgrown and in need of maintenance.
1292	Pond was observed with overgrown vegetation near the Welding Area.
	Minor amounts of trash were observed at the basin near Outfall 3.
	Tires and debris were observed accumulating in the basin in the Retail Sales Yard.
1711	Significant amounts of materials were stored around the detention basin.

8.0 Additional BMPs Selected for Implementation

Based on the pollutant source evaluation and evaluation of existing BMPs implemented at the site, the following additional BMPs or improvements to existing BMPs will be implemented to control pollutants generated from on-site industrial activities. Sections of the SWPPP will be revised to reflect the additional BMPs identified below.

Parameter Exceeded	Additional BMP(s) Implemented to Address Exceedance	Site	Date Implemented or Schedule for Implementation	SWPPP Section
Total Copper	Installation of treatment socks filled with chemical flocculant upstream of Outfall 1	1290	December 2017	Section 3.0
	Filtration bags/socks with a sorptive clay media were installed downstream of the flocculant socks closer to Outfall 1			
	Construction of a storm water retention pond in the northwest corner of the site	1711	February 2019	
	Minimize use of heavy equipment during rain events	1289	December 2019	
	Installation of numerous concrete barriers upstream of Outfall 1			
	Install a temporary gravel bag berm upstream of the trench drain	1263	December 2020	
	Fluid collection improvements for drain racks that include a closed loop fluid collection system and associated diaphragm pumps			
	Increased housekeeping in impervious areas prior to forecasted rain events	1263 1820-A	December 2020 December 2022	
	Implementation of sediment control BMPs around inlets located in the pervious portions of the facility	1820-A	December 2022	
	Stormwater treatment system maintenance		June-August 2022	
	Additional BMP maintenance and improvements targeting the removal of metals	1263 1289 1290 1711 1820-A	September-October 2023	

9.0 Modification to Existing Monitoring Implementation Program (MIP)

The following are changes or modifications made to the monitoring program, if any, in response to this evaluation. Modifications could be related to monitoring locations, sampling methodology, sampling frequency, and analytical parameters. Goals/objectives of monitoring program changes and how they relate to potential BMP improvements are listed below.

Additional Investigation(s)/Modification(s)	Goal/Objective
N/A	N/A

10.0 Evaluation and Report Completion/Submittal Information

1263 10/29/2020; 1289 1/1/2020; 1290 8/26/2019;
Date ERA Level 1 Evaluation Completed: 1711 8/14/2018; 1820-A 3/25/2022
Date BMP Implementation Complete: September-October 2023
Date ERA Level 1 Report Certified and Submitted: 2/22/2024

APPENDIX A

Summary of Stormwater Results

2019-2020 Summary of Stormwater Discharge Sampling Results

LKQ Pick Your Part 1263

9228 Tujunga Avenue

Sun Valley, California

Constituents		pH	TSS	O&G	Al	Cu	Fe	Pb	Zn
Unit		pH units	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Permit Limits	Instantaneous Maximum NAL	6.0-9.0	400	25	NA				
	Annual NAL	NA	100	15	0.75	0.0332	1.0	0.262	0.26
Sample Date	Location(s)								
4-Dec-2019	Outfall C	NA	NA	NA	NA	NA	NA	NA	NA
	Outfall D	NA	NA	NA	NA	NA	NA	NA	NA
	Outfall F	6.8	7.27	5.69	0.133	0.0481	0.182	0.00603	0.128

Annual Average: NA 7.27 5.69 0.133 0.0481 0.182 0.00603 0.128

Notes: TSS - Total Suspended Solids

O&G - Oil and grease

Al - Aluminum

Cu - Copper

Fe - Iron

Pb - Lead

Zn - Zinc

NA - Not available; not analyzed

mg/L - milligrams per liter

NAL - Numeric Action Level

200 Results reported at or above (outside) the NAL

2018-2019 Summary of Stormwater Discharge Sampling Results

LKQ Pick Your Part 1289

27600 North Sierra Del Sol Road

Thousand Palms, California

Constituents		pH	TSS	O&G	Al	Cu	Fe	Pb	Zn
Unit		pH units	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Permit Limits	Instantaneous Maximum NAL	6.0-9.0	400	25	NA				
	Annual NAL	NA	100	15	0.75	0.0332	1.0	0.262	0.26
Sample Date	Location(s)								
2-Feb-2019	Outfall 1	8.4	447	1.5	3.96	0.0574	7.34	0.0889	0.359

Annual Average: NA 447 1.5 3.96 0.0574 7.34 0.0889 0.359

Notes: TSS - Total Suspended Solids
O&G - Oil and grease
Al - Aluminum
Fe - Iron
Pb - Lead

NA - Not available; not analyzed
mg/L - milligrams per liter
NAL - Numeric Action Level
200 Results reported at or above (outside) the NAL

2018-2019 Summary of Stormwater Discharge Sampling Results
LKQ Pick A Part 1290
3760 Pyrite Street
Riverside, California

Constituents		pH	TSS	O&G	Al	Cu	Fe	Pb	Zn
Unit		pH units	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Permit Limits	Instantaneous Maximum NAL	6.0-9.0	400	25	NA				
	Annual NAL	NA	100	15	0.75	0.0332	1.0	0.262	0.26
Sample Date	Location(s)								
4-Feb-2019	Outfall 1	NA	239	0.96	5.70	0.0521	7.59	0.146	0.287

Annual Average: NA **239** 0.96 **5.70** **0.0521** **7.59** 0.146 **0.287**

Notes: TSS - Total Suspended Solids
O&G - Oil and grease
Al - Aluminum
Cu - Copper
Fe - Iron
Pb - Lead

Zn - Zinc
NA - Not available; not analyzed
mg/L - milligrams per liter
NAL - Numeric Action Level
200 Results reported at or above (outside) the NAL

2017-2018 Summary of Stormwater Discharge Sampling Results
LKQ Lakenor Auto Truck Salvage, Inc. 1711
11200 Alden Road
Adelanto, California

Constituents			pH	TSS	O&G	Al	Fe	Cu	Zn	Pb
Unit			pH units	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Permit Limits	Instantaneous Maximum NAL		6.0-9.0	400	25	NA				
	Annual NAL		NA	100	15	0.75	1.0	0.0332	0.26	0.262
Sample Date		Location(s)								
9-Jan-2018		Outfall A	NA	7660	3.2	60.7	16.6	0.208	1.19	0.465

Annual Average:	NA	7660	3.2	60.7	16.6	0.208	1.19	0.465
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Notes:

TSS - Total Suspended Solids	Zn - Zinc
O&G - Oil and grease	NA - Not available; not analyzed
Al - Aluminum	mg/L - milligrams per liter
Cu - Copper	NAL - Numeric Action Level
Fe - Iron	200 Results reported at or above (outside) the N.
Pb - Lead	

2021-2022 Summary of Stormwater Discharge Sampling Results
LKQ ACME Truck Parts 1820A
1016 South Wilson Way
Stockton, California

Constituents		pH	TSS	O&G	Al	Fe	Pb	Cu	Zn
Unit		pH units	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Permit Limits	Instantaneous Maximum NAL	6.0-9.0	400	25	NA				
	Annual NAL	NA	100	15	0.75	1.0	0.262	0.0332	0.26
Sample Date	Location(s)								
23-Dec-2021	Outfall 001	6.8	296	8.91	10.1	15.1	0.0728	0.136	0.3730

Annual Average:	NA	296	8.91	10.1	15.1	0.0728	0.136	0.3730
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Notes: TSS - Total Suspended Solids
O&G - Oil and grease
Al - Aluminum
Cu - Copper
Fe - Iron
Pb - Lead

Zn - Zinc
NA - Not available; not analyzed
mg/L - milligrams per liter
NAL - Numeric Action Level
200 Results reported at or above (outside) the NAL

APPENDIX B

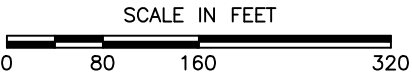
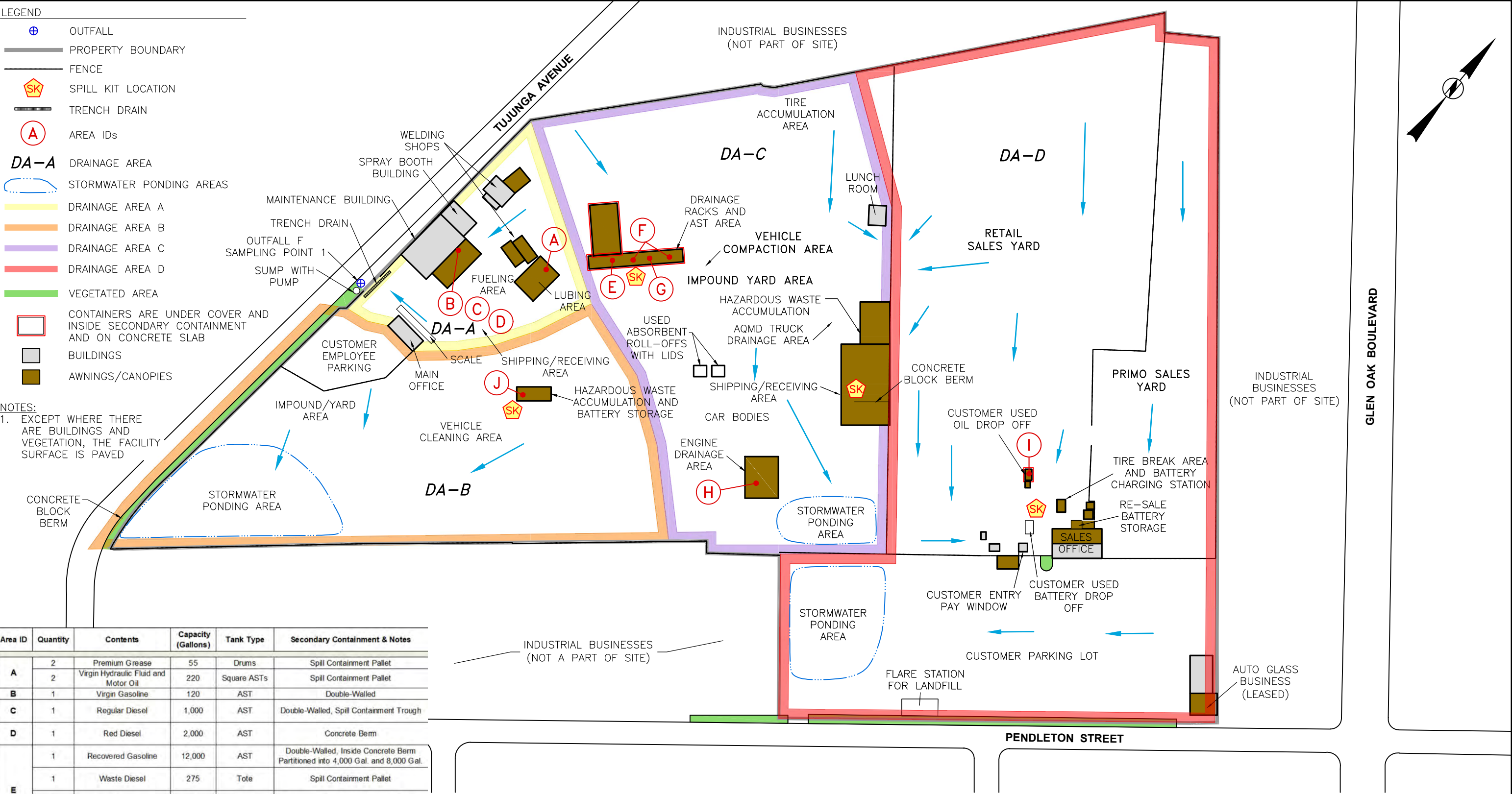
Site Maps

LEGEND

- ⊕ OUTFALL
- PROPERTY BOUNDARY
- FENCE
- SK SPILL KIT LOCATION
- TRENCH DRAIN
- A AREA IDs
- DA-A DRAINAGE AREA
- STORMWATER PONDING AREAS
- DRAINAGE AREA A
- DRAINAGE AREA B
- DRAINAGE AREA C
- DRAINAGE AREA D
- VEGETATED AREA
- CONTAINERS ARE UNDER COVER AND INSIDE SECONDARY CONTAINMENT AND ON CONCRETE SLAB
- BUILDINGS
- AWNINGS/CANOPIES

NOTES:
1. EXCEPT WHERE THERE ARE BUILDINGS AND VEGETATION, THE FACILITY SURFACE IS PAVED

Area ID	Quantity	Contents	Capacity (Gallons)	Tank Type	Secondary Containment & Notes
A	2	Premium Grease	55	Drums	Spill Containment Pallet
	2	Virgin Hydraulic Fluid and Motor Oil	220	Square ASTs	Spill Containment Pallet
B	1	Virgin Gasoline	120	AST	Double-Walled
C	1	Regular Diesel	1,000	AST	Double-Walled, Spill Containment Trough
D	1	Red Diesel	2,000	AST	Concrete Berm
E	1	Recovered Gasoline	12,000	AST	Double-Walled, Inside Concrete Berm Partitioned into 4,000 Gal. and 8,000 Gal.
	1	Waste Diesel	275	Tote	Spill Containment Pallet
	2	Used Antifreeze	300	AST	Double-Walled, Inside Concrete Berm
	1	Used Oil	2,000	AST	Double-Walled, Inside Concrete Berm
F	3	Used Anti-freeze	275	Plastic Tote AST	On Spill Pallet Containment (55"x55"x37.5") Inside Concrete Berm
G	1	Used Oil	2,000	AST	Double-Walled, Inside Concrete Berm
H	1	Used Oil	275	Tote	Spill Containment Pallet
	1	Waste Diesel	275	Tote	Spill Containment Pallet
I	1	Used Oil	1,000	AST	Double-Walled, Inside Concrete Berm
J	2	Used Oil	275	Tote	Spill Containment Pallet



CHECK BY	DC
DRAWN BY	OS
DATE	10-26-23
SCALE	AS SHOWN
CAD NO.	LKQ001-0524036-23009379
PRJ NO.	LKQ001-0524036-23009379

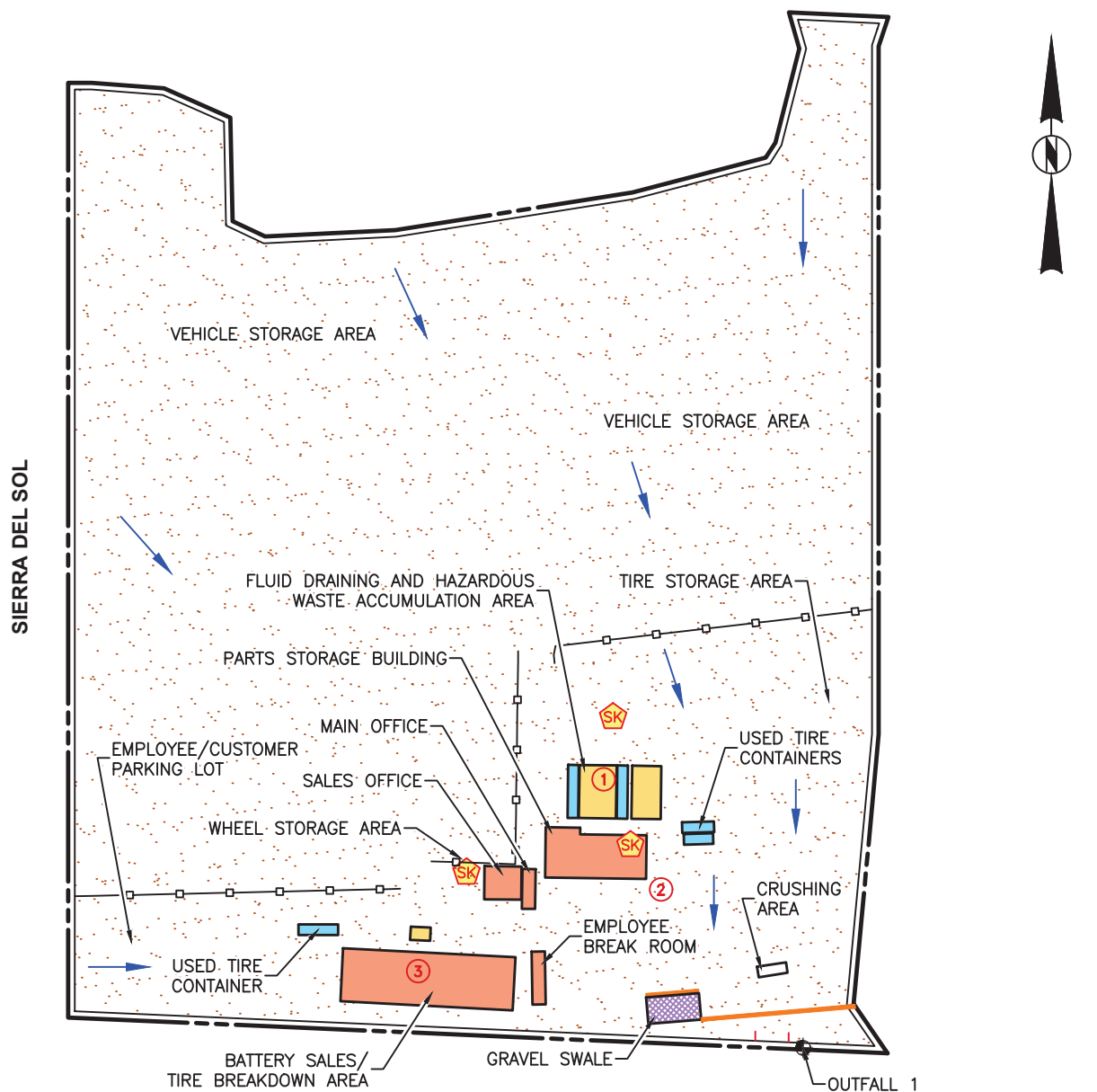
SITE LAYOUT DIAGRAM

LKQ – PICK YOUR PART
9228 TUJUNGA AVENUE
SUN VALLEY, CALIFORNIA



FIGURE

1



LEGEND

	Site Boundary/Drainage Area 1		Building	①	1,000 Gallon Gasoline ASTs #1 & #2 1,000 Gallon Used Oil AST #3 240 Gallon Waste Anti-Freeze ASTs #5 & #6 120 Gallon Used Oil AST #8 55 Gallon Virgin Anti-Freeze Drums #1 & #2 55 Gallon Virgin Transmission Fluid Drum #3 55 Gallon Virgin Hydraulic Fluid Drum #4 55 Gallon Virgin Heavy Duty Diesel Engine Oil Drum #5
	Fence		Awning/Canopy	②	500 Gallon Red Dyed Diesel AST #4
	Gravel Bags		Container/Roll-Off	③	120 Gallon Used Oil AST #7
	Straw Wattle		Soil		
	Flow Direction		Gravel Swale		
	Spill Kit				
	Outfall 1				



CHECK BY	DC
DRAWN BY	EM
DATE	08-24-23
SCALE	AS SHOWN
CAD NO.	0524036-23009206
PRJ NO.	LK001-0524036-23009206

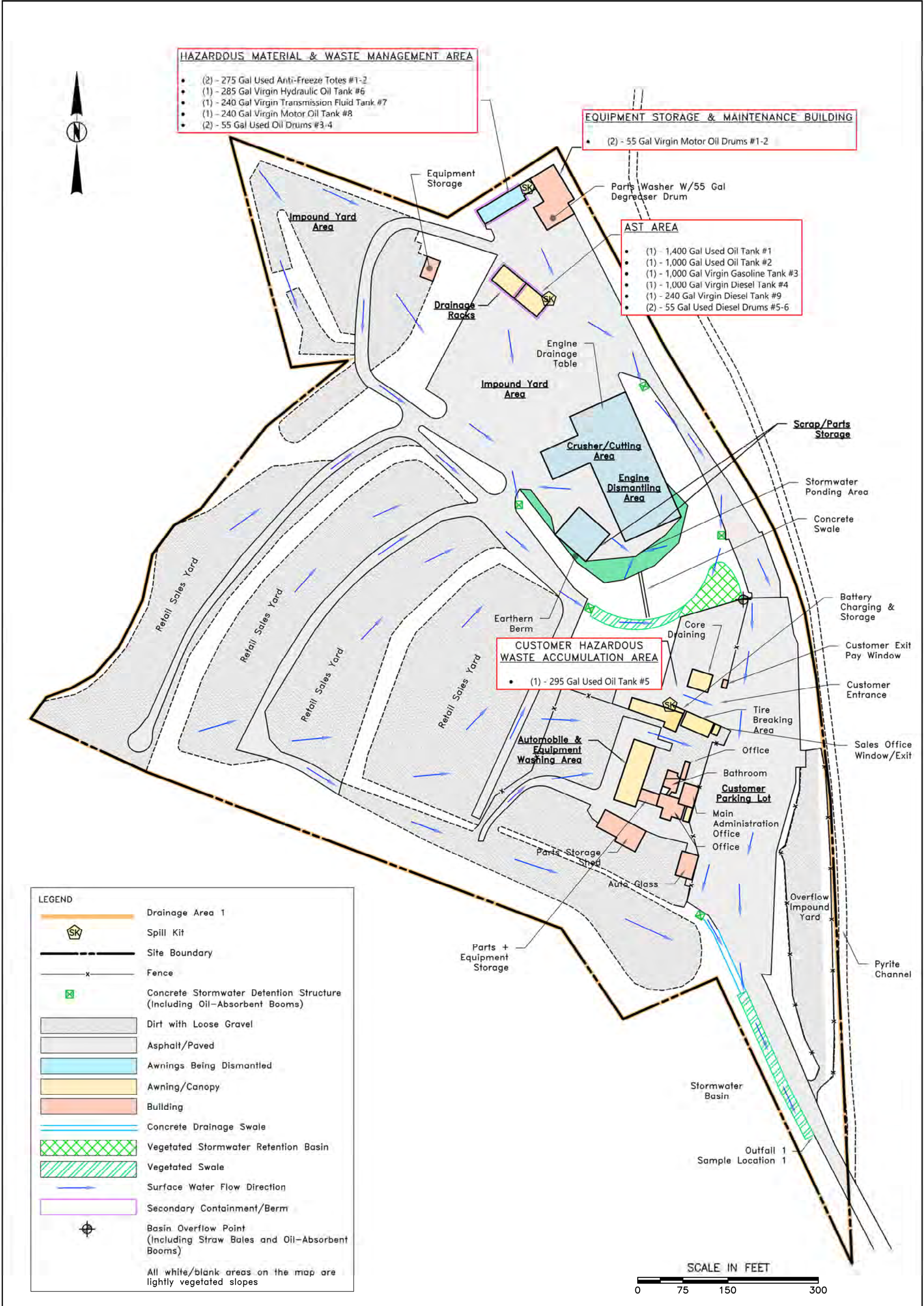
SITE PLAN

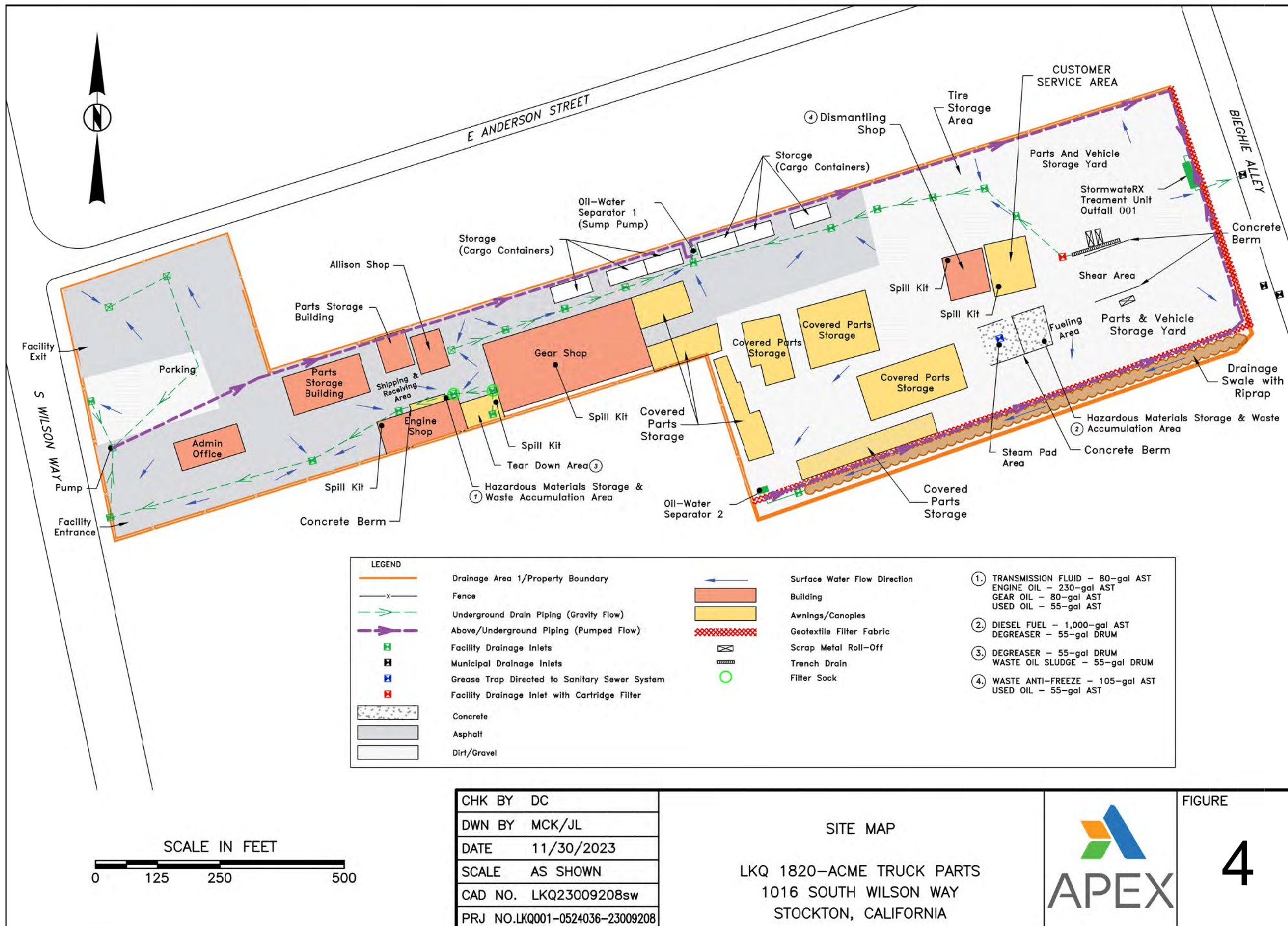
LKQ PICK YOUR PART THOUSAND PALMS
27600 SIERRA DEL SOL
THOUSAND PALMS, CALIFORNIA

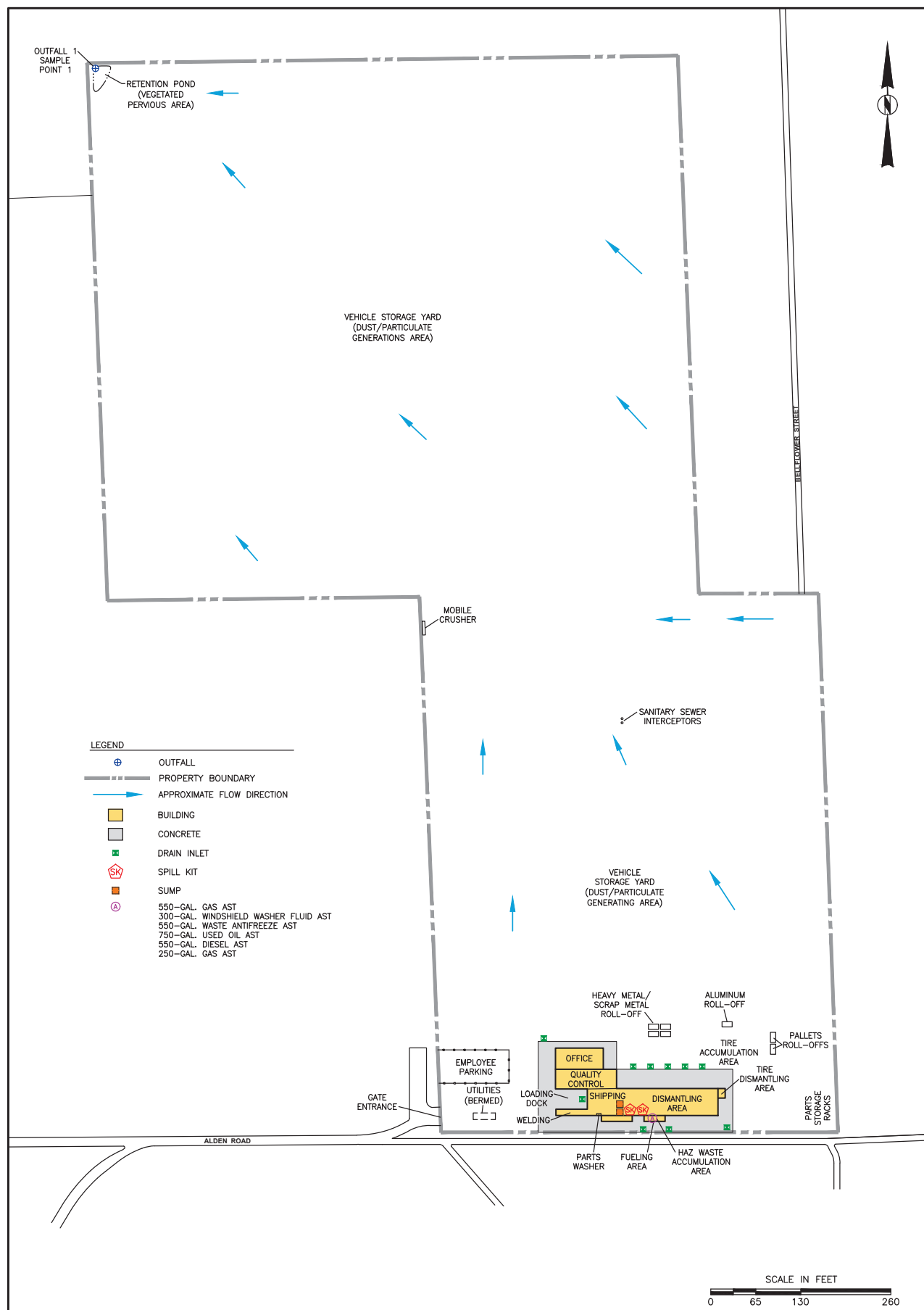


FIGURE

2







CHECK BY	DC
DRAWN BY	OS
DATE	9-29-23
SCALE	AS SHOWN
CAD NO.	LK0001-0524036-23009656
PRJ NO.	LK0001-0524036-23009656

SITE LAYOUT DIAGRAM
LKQ LAKENOR AUTO & TRUCK SALVAGE, INC.
11200 ALDEN ROAD
ADELANTO, CALIFORNIA



FIGURE

5

**CONSOLIDATED LEVEL 1 EXCEEDANCE RESPONSE
ACTION (ERA) REPORT
(TSS)**

For

LKQ Corporation
1287 – Victorville, 1292 – Hesperia, 1711 – Adelanto
& 1820A - Stockton

Compliance Group Leader (CGL)

Timothy Klein
LKQ Corporation
7411 Goen Place, Suite B
San Diego, CA 92120
(858) 997-4939

Level 1 ERA Prepared by:

Apex Companies, LLC
5355 Avenida Encinas, Suite 107
Carlsbad, CA 92008

Level 1 ERA Preparation Date

February 2024

Table of Contents

Introduction	1
1.0 Facility Information	1
2.0 QISP Information.....	2
3.0 Summary of Numeric Action Level (NAL) Exceedances	3
4.0 SWPPP Review	3
5.0 Evaluation/Identification of Potential Pollutant Sources.....	4
6.0 Minimum BMP Evaluation	4
7.0 Advanced BMPs.....	5
8.0 Additional BMPs Selected for Implementation.....	6
9.0 Modification to Existing Monitoring Implementation Program (MIP)	7
10.0 Evaluation and Report Completion/Submittal Information	7

Appendices

- A Summary of Stormwater Results
- B Site Maps

Facility Name:	LKQ – Pick Your Part (#1287)
Waste Discharge Identification (WDID):	6B36I025934
Date Entered Level 1 Status:	July 1, 2019
Facility Name:	LKQ Pick Your Part – Hesperia (#1292)
Waste Discharge Identification (WDID):	6B36I023434
Date Entered Level 1 Status:	July 1, 2017
Facility Name:	LKQ Lakenor Auto Truck Salvage, Inc. (#1711)
Waste Discharge Identification (WDID):	6B36I025414
Date Entered Level 1 Status:	July 1, 2018
Facility Name:	LKQ – Acme Truck Parts (#1820-A)
Waste Discharge Identification (WDID):	5S39I023389
Date Entered Level 1 Status:	July 1, 2022

"I certify under penalty of law that this document and all Attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, to the best of my knowledge and belief, the information submitted is, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Timothy Klein

*Compliance Group Leader (CGL) / Duly Authorized
Representative (DAR)*

Tim Klein

Signature of CGL / DAR

2-23-24

Date

Introduction

California's National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Industrial Activity – Order 2014-0057-DWQ (General Permit) requires a Level 1 Exceedance Response Action (ERA) Evaluation and Report to be developed if there are Numeric Action Level (NAL) Exceedances as defined in the Industrial General Permit (IGP). This report identifies potential industrial activities that may have contributed to pollutant concentrations above the NALs during the 2016-2017, 2017-2018, 2018-2019, and 2021-2022 reporting years. This Level 1 ERA Report describes the Best Management Practices (BMPs) and revisions to the facility's Storm Water Pollution Prevention Plan (SWPPP) to reduce pollutant concentrations in storm water runoff. This report was prepared in accordance with the requirements of the IGP.

The LKQ Corporation Stormwater Compliance Group was formed to create a group of dischargers with similar industrial activities, pollutant sources, and pollutant characteristics and to share knowledge and implementation of BMPs to reduce those pollutants at each site. This Consolidated ERA Level 1 Evaluation and Report (Consolidated Report) for Total Suspended Solids (TSS) Exceedances was prepared by the Compliance Group Leader (CGL), Timothy Klein, QISP and ToR #901. The Level 1 ERA assessments were conducted during 2017, 2018, 2019, and 2022. For the Compliance Group, in accordance with Section XIV.B.3 of the Permit, "A Compliance Group Leader shall prepare a Consolidated Level 1 ERA Report for all Compliance Group participants with Level 1 status for the same parameter. Compliance Group participants who certify and submit these Consolidated Level 1 ERA Reports are subject to the same provisions as individual Dischargers with Level 1 status, as described in Section XII.C. A Consolidated Level 1 ERA Report is equivalent to a Level 1 ERA Report."

1.0 Facility Information

The primary function at the LKQ Corporation participant sites consists of automotive dismantling and parts recycling. One site in the LKQ Corporation Stormwater Group was identified in the Water Board's Storm Water Multiple Application and Report Tracking System (SMARTS) as moving from baseline status to Level 1 status for TSS Annual Average Exceedances compared with the NALs identified in the permit during the 2021-2022 reporting year. The participant sites are listed in the following table, which includes participant sites that were already in Level 1 for TSS prior to the 2021-2022 reporting year.

Facility Name	LKQ – Pick Your Part (#1287)
Address	17229 Gas Line Road, Victorville, CA 92394
WDID	6B36I025934
SIC Code(s)	5015
Designated LRP	Zelene Salamanca
Phone Number	(760) 241-8414
E-mail Address	zxsalamanca@lkqcorp.com

Facility Name	LKQ Pick Your Part – Hesperia (#1292)
Address	11399 Santa Fe Avenue East, Hesperia, CA 92345
WDID	6B 36I023434
SIC Code(s)	5015
Designated LRP	Angel Gutierrez
Phone Number	760-275-5077
E-mail Address	axgutierrez@LKQCORP.com
Facility Name	LKQ Lakenor Auto Truck Salvage, Inc. (#1711)
Address	11200 Alden Road, Adelanto, CA 92301,
WDID	6B36I025934
SIC Code(s)	5015
Designated LRP	Nick Castillo
Phone Number	(209) 345-0204
E-mail Address	nidcastillo@LKQCORP.com
Facility Name	LKQ – Acme Truck Parts (#1820-A)
Address	1016 South Wilson Way, Stockton, CA 95205
WDID	5S39I023389
SIC Code(s)	5015
Designated LRP	Johnny Farah
Phone Number	415-525-2282
E-mail Address	jfarah@lkqcorp.com

2.0 QISP Information

The IGP requires the discharger to enlist the services of a Qualified Industrial Stormwater Practitioner (QISP) to assist with the ERA Level 1 Evaluation and prepare the ERA Level 1 Report. Information related to the QISP assisting with this evaluation and report are included below.

Name: Timothy Klein

QISP/Tor Cert. Number: 00901

Affiliation: LKQ Corporation

Phone Number: 858-997-4939

E-mail Address: taklein@lkqcorp.com

Scope of Services Provided: ERA Level 1 Evaluation and Report

3.0 Summary of Numeric Action Level (NAL) Exceedances

The following table summarizes the NAL Exceedance(s) being addressed in this Level 1 ERA Evaluation and Report.

Site	Parameter Exceeded ¹	Reporting Year	Annual NAL Exceedance	Data Summary Used to Calculate Annual Average NAL Exceedance		
				# of Samples	Sum of Results	Discharge Point(s)
1287	TSS	2018-2019	203 mg/L	2	405 mg/L	Outfall 1
1292	TSS	2016-2017	137 mg/L	2	273 mg/L	Outfall 1
1711	TSS	2017-2018	7660 mg/L	1	7660 mg/L	Outfall A
1820-A	TSS	2021-2022	296 mg/L	1	296 mg/L	Outfall 001

¹NAL Exceedances summarized in this table are consistent with SMARTS.

4.0 SWPPP Review

The SWPPPs were reviewed to assess compliance with requirements outlined in Section X of the IGP. This review includes all sections of the SWPPPs, including the site map, monitoring implementation plan, potential pollutant generating activities, and BMP selection and implementation. The table below summarizes the review.

Site	SWPPP (General Permit Section)	SWPPP Page # or Reference Location	Date Implemented or Last Revised	Comments
1287	Stormwater BMPs (Section X.H)	§3.0	December 2018	Section 3.0 in each of the SWPPPs was updated to include the additional Level 1 ERA BMPs listed in this report.
1292			November 2023	
1711			September 2023	
1820-A			November 2023	

5.0 Evaluation/Identification of Potential Pollutant Sources

Pollutant source evaluation for each parameter exceeding an NAL are summarized in **Section 3.0** above. Findings related to the evaluation are summarized below.

Parameter Exceeded	Potential Source/Activity Generating Exceedance	Likely Source	Existing BMPs to Address the Source
Total Suspended Solids	- Majority of the sites include gravel and soil; - Airborne dust and particulate deposition from on- and off-site locations; - Tracking of sediment by transport vehicles and equipment	- Industrial - Natural Background	- Employee training - Good housekeeping - Preventative maintenance - Material handling and waste management - Spill and leak prevention and response - Erosion and sediment control - Overhead cover - Storm water treatment systems - Dust control - Retention basins - Work conducted indoors when possible

Based on the evaluation, is additional investigation and/or monitoring necessary to identify the potential pollutants source(s)? ☐ Yes ☒ No

If yes, document the specific parameter and the additional investigation/monitoring needed to establish the pollutant source in the table below.

Parameter	Additional Investigation/Monitoring	Goal/Objective
N/A	N/A	N/A

6.0 Minimum BMP Evaluation

An evaluation of the Minimum BMPs (IGP Section X.H.1) included in the SWPPP was performed to assess if adequately implemented at the site, particularly for those areas identified as potential pollutant sources in **Section 5.0** of this report. Minimum BMP deficiencies are identified in the table below.

Site	Deficiency Noted
1287	Moderate erosion was observed at Outfall 1.
	Minor amounts of car parts and staining was observed on the ground in the Vehicle Storage Area from day-to-day operations.
1292	Moderate amounts of spills and staining observed in the Dismantling / Fluid Draining Area.
	Minor to moderate to amount of car parts were observed on the ground in the yard from day-to-day operations.
1711	Moderate amounts of trash, sediment, and debris observed around the stormwater drain inlets on the east side of the site.
	Significant amounts of sediment surround the drain inlets in the north side of the main building.
	Moderate amounts of trash and parts were observed near the outfall.

Site	Deficiency Noted
1711	Moderate amounts of spills and staining observed on the ground in the west side of the Dismantling Area.
	Moderate amounts of car parts were observed throughout the yard due to day-to-day operations.
	Moderate amounts of water and sediment from the parts washer was observed leaking into the secondary containment of the propane tank.
1820-A	Stains observed on the ground in the Shear and Covered Parts Storage Areas.

7.0 Advanced BMPs

An evaluation of any Advanced BMPs (IGP Section X.H.2) was performed to assess if adequately implemented at the site. Advanced BMPs deficiencies are identified in the table below.

Site	Deficiency Noted
1292	Pond was observed with overgrown vegetation near the Welding Area.
	Minor amounts of trash were observed at the basin near Outfall 3.
	Tires and debris were observed accumulating in the basin in the Retail Sales Yard.
1711	Significant amounts of materials were stored around the detention basin.

8.0 Additional BMPs Selected for Implementation

Based on the pollutant source evaluation and evaluation of existing BMPs implemented at the site, the following additional BMPs or improvements to existing BMPs will be implemented to control pollutants generated from on-site industrial activities. Sections of the SWPPP will be revised to reflect the additional BMPs identified below.

Parameter Exceeded	Additional BMP(s) Implemented to Address Exceedance	Site	Date Implemented or Schedule for Implementation	SWPPP Section
Total Suspended Solids	Gravel bag berms installed near property boundary areas with run-on	1292	December 2017	Section 3.0
	Check dams and sediment controls will be temporarily implemented within access roads and concrete swales during rain events			
	Installation of flow dissipaters to slow the flow of storm water into the retention pond			
	Accumulated sediment was removed from the retention basin at Outfall 1			
	Construction of a storm water retention pond in the northwest corner of the site	1711	February 2019	
	Strategic implementation of flow dissipaters (gravel/sand bags) across the upper tier of the retail sales yard, surrounding Outfall 001	1287	November 2019	
	Strategic implementation of sediment control BMPs (straw wattle) along slopes and observable areas of sheet flow throughout the site			
	Implementation of sediment control BMPs for drainage inlets located in the pervious portions of the facility	1820-A	December 2022	
	Sweeping and blowing of impervious portions of the site immediately prior to rain events			
	Strategic implementation of gravel bag check dams in the vicinity of drainage inlets			
	Storm water treatment system maintenance	1820-A	June-August 2022	
	Additional BMP maintenance and improvements targeting the removal of total suspended solids	1287 1292 1711 1820-A	October 2023	

9.0 Modification to Existing Monitoring Implementation Program (MIP)

The following are changes or modifications made to the monitoring program, if any, in response to this evaluation. Modifications could be related to monitoring locations, sampling methodology, sampling frequency, and analytical parameters. Goals/objectives of monitoring program changes and how they relate to potential BMP improvements are listed below.

Additional Investigation(s)/Modification(s)	Goal/Objective
N/A	N/A

10.0 Evaluation and Report Completion/Submittal Information

1287 8/29/2019; 1292 11/2/2017; 1711 8/29/2019;
Date ERA Level 1 Evaluation Completed: 1820-A 3/25/2022
Date BMP Implementation Complete: October 2023
Date ERA Level 1 Report Certified and Submitted: 2/22/2024

APPENDIX A

Summary of Stormwater Results

2017-2018 Summary of Stormwater Discharge Sampling Results
LKQ Lakenor Auto Truck Salvage, Inc. 1711
11200 Alden Road
Adelanto, California

Constituents		pH	TSS	O&G	Al	Fe	Cu	Zn	Pb	
Unit		pH units	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	
Permit Limits	Instantaneous Maximum NAL	6.0-9.0	400	25	NA					
	Annual NAL	NA	100	15	0.75	1.0	0.0332	0.26	0.262	
Sample Date		Location(s)								
9-Jan-2018		Outfall A	NA	7660	3.2	60.7	16.6	0.208	1.19	0.465

Annual Average:	NA	7660	3.2	60.7	16.6	0.208	1.19	0.465
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Notes:

TSS - Total Suspended Solids

O&G - Oil and grease

Al - Aluminum

Cu - Copper

Fe - Iron

Pb - Lead

Zn - Zinc

NA - Not available; not analyzed

mg/L - milligrams per liter

NAL - Numeric Action Level

200 Results reported at or above (outside) the N.

2016-2017 Summary of Stormwater Discharge Sampling Results
LKQ Pick Your Part 1292
11399 Santa Fe Avenue East
Hesperia, California

Constituents		pH	TSS	O&G	Al	Fe	Pb	Cu	Zn
Unit		pH units	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Permit Limits	Instantaneous	6.0-9.0	400	25	NA				
	Maximum NAL								
	Annual NAL	NA	100	15	0.75	1.0	0.262	0.0332	0.26
Sample Date	Location(s)								
24-Oct-2016	Outfall 1	NA	NA	NA	NA	NA	NA	NA	NA
	Outfall 2	NA	NA	NA	NA	NA	NA	NA	NA
	Outfall 3	NA	NA	NA	NA	NA	NA	NA	NA
	Outfall 4	7.2	40	3.4	2.43	3.46	0.0462	0.0395	0.336
23-Jan-2017	Outfall 1	7.2	233	3.5	8.98	7.10	0.106	NA	NA
	Outfall 2	NA	NA	NA	NA	NA	NA	NA	NA
	Outfall 3	NA	NA	NA	NA	NA	NA	NA	NA
	Outfall 4	NA	NA	NA	NA	NA	NA	NA	NA

Annual Average: NA **137** 3.5 **5.71** **5.28** 0.0761 0.0395 0.336

Notes: TSS - Total Suspended Solids
O&G - Oil and grease
Al - Aluminum
Cu - Copper
Fe - Iron
Pb - Lead
Zn - Zinc

NA - Not available; not analyzed
mg/L - milligrams per liter
NAL - Numeric Action Level
200 Results reported at or above (outside) the NAL

2018-2019 Summary of Stormwater Discharge Sampling Results

LKQ Pick Your Part 1287

17229 Gas Line Road

Victorville, California

Constituents		pH	TSS	O&G	Al	Cu	Fe	Pb	Zn
Unit		pH units	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Permit Limits	Instantaneous	6.0-9.0	400	25	NA				
	Maximum NAL								
	Annual NAL	NA	100	15	0.75	0.0332	1.0	0.262	0.26
Sample Date	Location(s)								
6-Dec-2018	Outfall 1	6.8	169	18	3.32	NA	3.91	0.123	NA
14-Feb-2019	Outfall 1	7.2	236	1.1	6.50	0.107	6.83	0.161	0.467

Annual Average: NA 203 9.6 4.91 0.107 5.37 0.142 0.467

Notes: TSS - Total Suspended Solids

O&G - Oil and grease

Al - Aluminum

Fe - Iron

Pb - Lead

Cu - Copper

Zn - Zinc

NAL - Numeric Action Level

NA - Not available; not analyzed

mg/L - milligrams per liter

200 Results reported at or above (outside) the NAL

2021-2022 Summary of Stormwater Discharge Sampling Results
LKQ ACME Truck Parts 1820A
1016 South Wilson Way
Stockton, California

Constituents		pH	TSS	O&G	Al	Fe	Pb	Cu	Zn
Unit		pH units	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Permit Limits	Instantaneous Maximum NAL	6.0-9.0	400	25	NA				
	Annual NAL	NA	100	15	0.75	1.0	0.262	0.0332	0.26
Sample Date	Location(s)								
23-Dec-2021	Outfall 001	6.8	296	8.91	10.1	15.1	0.0728	0.136	0.3730

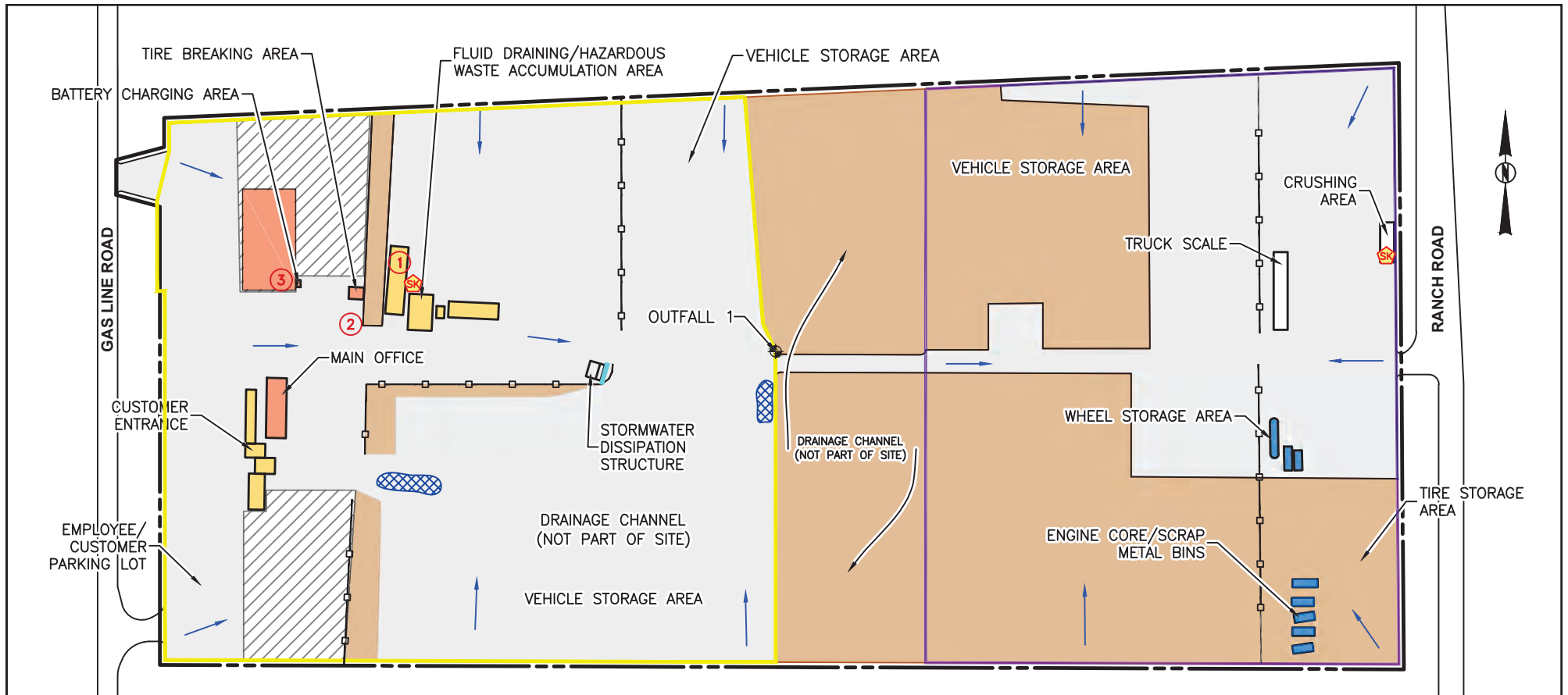
Annual Average:	NA	296	8.91	10.1	15.1	0.0728	0.136	0.3730
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Notes: TSS - Total Suspended Solids
O&G - Oil and grease
Al - Aluminum
Cu - Copper
Fe - Iron
Pb - Lead

Zn - Zinc
NA - Not available; not analyzed
mg/L - milligrams per liter
NAL - Numeric Action Level
200 Results reported at or above (outside) the NAL

APPENDIX B

Site Maps



LEGEND

- Site Boundary
- Fence
- DA-1
- DA-2
- Straw Wattle
- Flow Direction

- Building
- Awning/Canopy
- Asphalt/Pavement
- Metal Bins/Storage Containers

- Soil
- Leased Area
- Retention Basin
- Outfall
- Spill Kit

- ① 2,000-Gallon Recovered Gasoline AST #1
500-Gallon Used Oil AST #3
220-Gallon Used Anti-Freeze AST #4
120-Gallon Virgin Hydraulic Oil AST #6
55-Gallon Used Brake Fluid Drum #1
55-Gallon Used Gas & Water Drum #2
240-Gallon Used Gasoline AST #7
- ② 500-Gallon Red-Dyed Diesel AST #2
- ③ 120-Gallon Used Oil AST #5



CHK BY	DC
DWN BY	EM
DATE	09-27-23
SCALE	AS SHOWN
CAD NO.	0524036-23009653
PRJ NO.	LKQ001-0524036-23009653

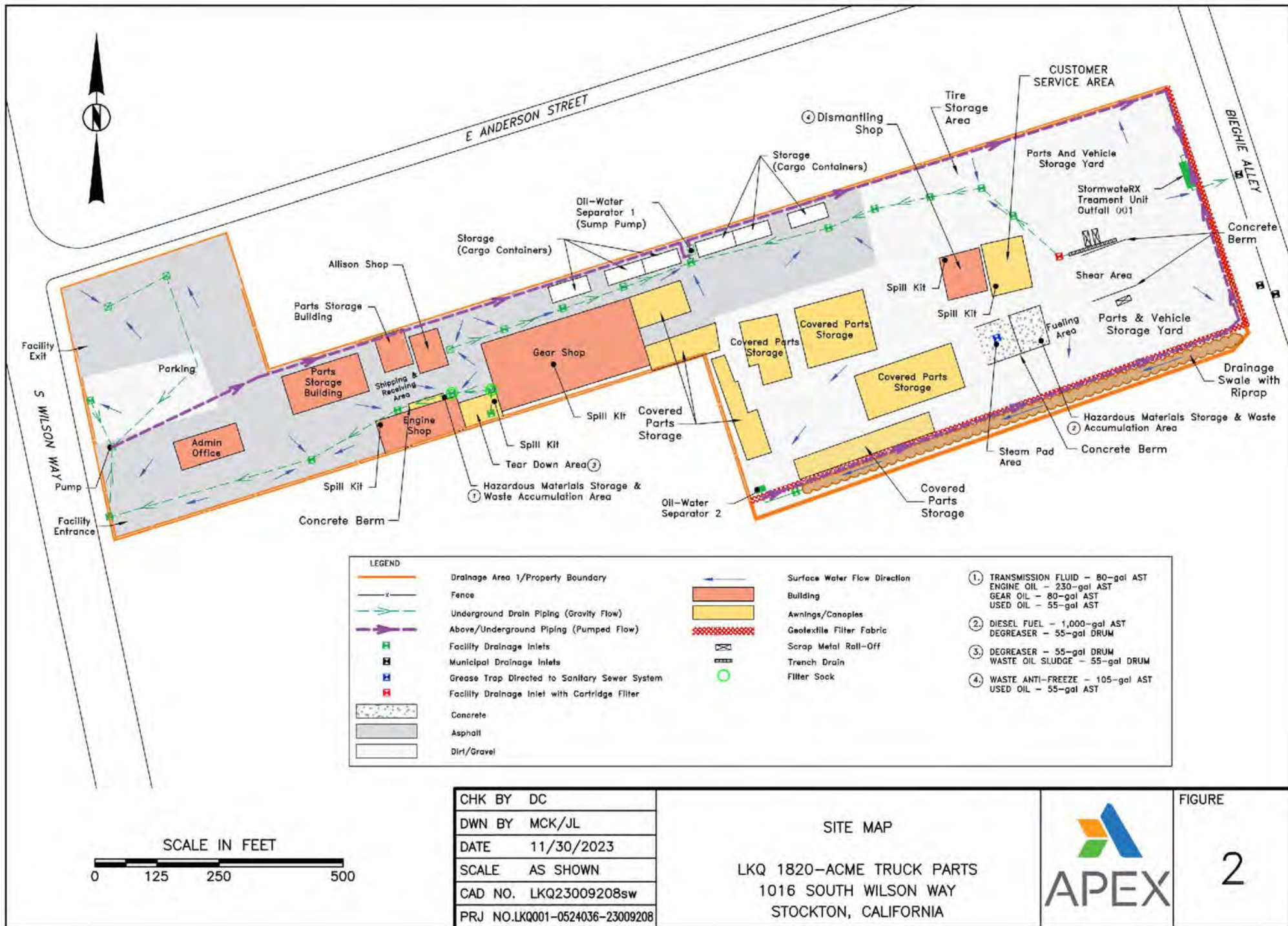
SITE PLAN

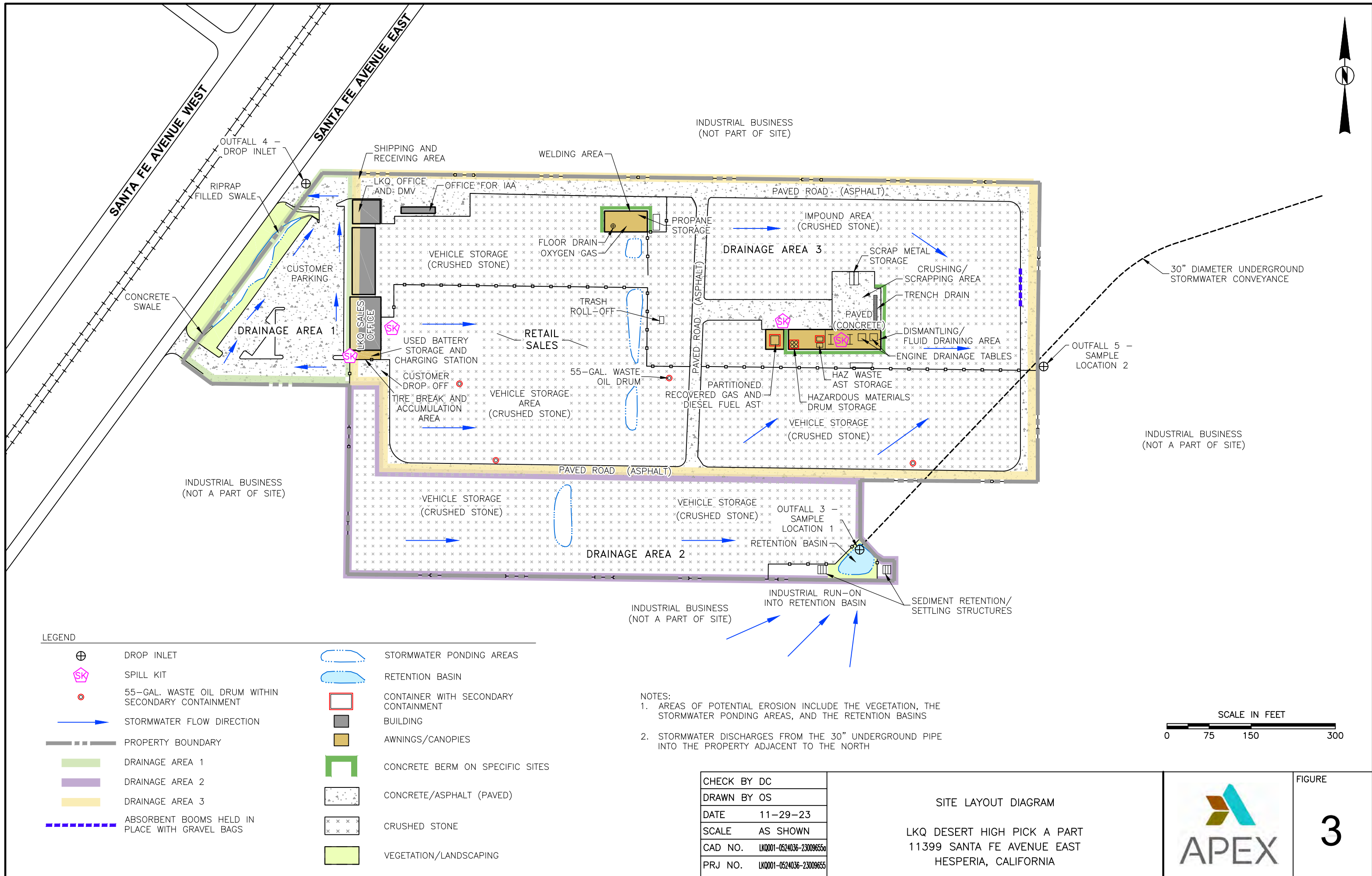
LKQ PICK YOUR PART VICTORVILLE
17229 GAS LINE ROAD
VICTORVILLE, CALIFORNIA

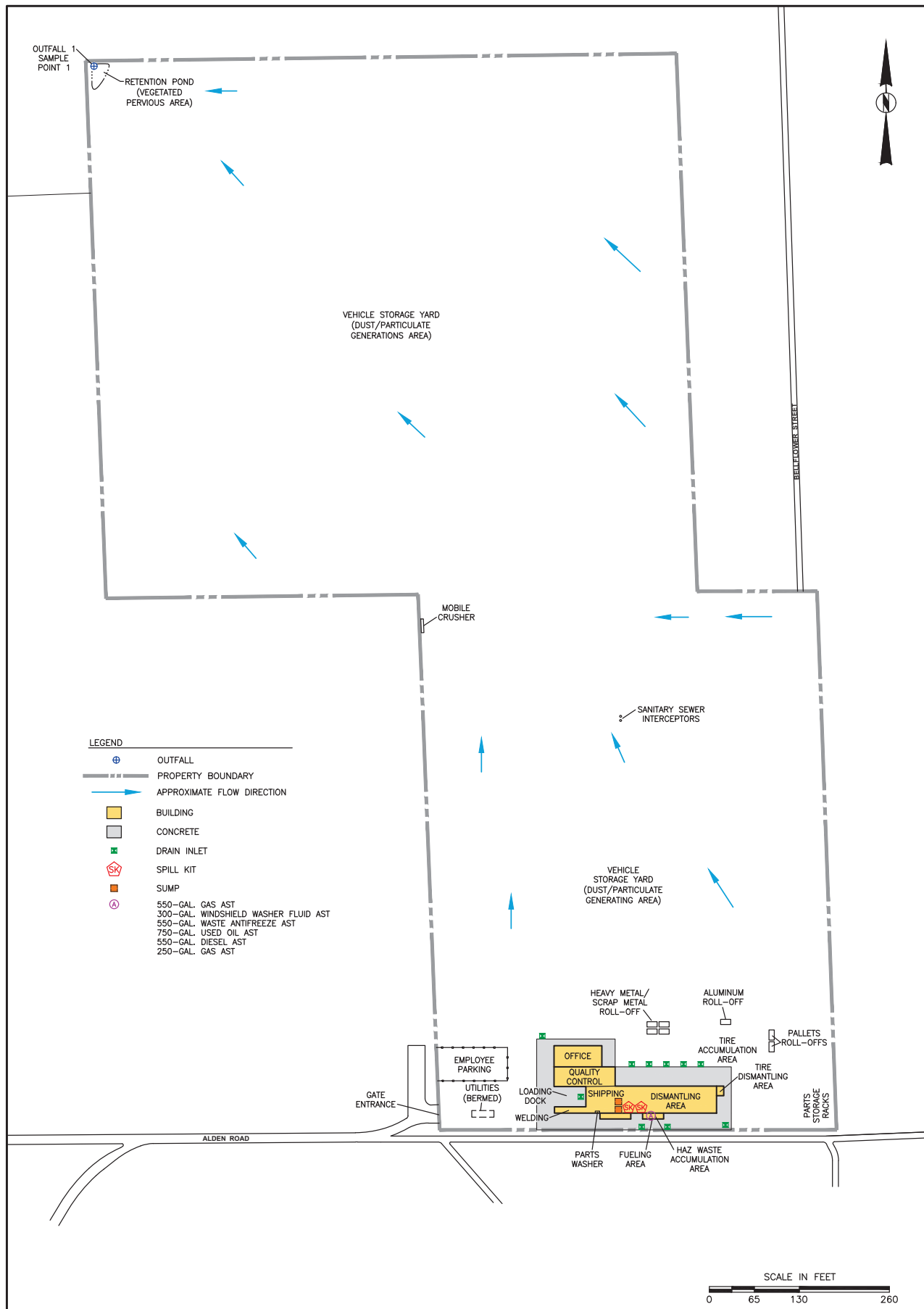


FIGURE

1







CHECK BY DC	SITE LAYOUT DIAGRAM LKQ LAKENOR AUTO & TRUCK SALVAGE, INC. 11200 ALDEN ROAD ADELANTO, CALIFORNIA		FIGURE 4
DRAWN BY OS			
DATE 9-29-23			
SCALE AS SHOWN			
CAD NO. LK0001-0524036-23009656			
PRJ NO. LK0001-0524036-23009656			

**CONSOLIDATED LEVEL 1 EXCEEDANCE RESPONSE
ACTION (ERA) REPORT
(Zn)**

For

LKQ Corporation

1281 – Monrovia, 1286A – Oceanside, 1289 – Thousand Palms,
1290 – Riverside, 1711 – Adelanto & 1820A - Stockton

Compliance Group Leader (CGL)

Timothy Klein
LKQ Corporation
7411 Goen Place, Suite B
San Diego, CA 92120
(858) 997-4939

Level 1 ERA Prepared by:

Apex Companies, LLC
5355 Avenida Encinas, Suite 107
Carlsbad, CA 92008

Level 1 ERA Preparation Date

February 2024

Table of Contents

Introduction	1
1.0 Facility Information	1
2.0 QISP Information.....	3
3.0 Summary of Numeric Action Level (NAL) Exceedances	3
4.0 SWPPP Review	4
5.0 Evaluation/Identification of Potential Pollutant Sources.....	4
6.0 Minimum BMP Evaluation	5
7.0 Advanced BMPs.....	6
8.0 Additional BMPs Selected for Implementation.....	6
9.0 Modification to Existing Monitoring Implementation Program (MIP)	7
10.0 Evaluation and Report Completion/Submittal Information	7

Appendices

- A Summary of Stormwater Results
- B Site Maps

Facility Name:	LKQ Pick Your Part - Monrovia (1281)
Waste Discharge Identification (WDID):	4 19I010791
Date Entered Level 1 Status:	July 1, 2022
Facility Name:	LKQ Pick Your Part – Oceanside (1286-A)
Waste Discharge Identification (WDID):	9 37I025964
Date Entered Level 1 Status:	July 1, 2017
Facility Name:	LKQ – Pick Your Part, Thousand Palms (1289)
Waste Discharge Identification (WDID):	7 33I025935
Date Entered Level 1 Status:	July 1, 2019
Facility Name:	LKQ – Pick Your Part (1290)
Waste Discharge Identification (WDID):	8 33I023435
Date Entered Level 1 Status:	July 1, 2019
Facility Name:	LKQ Lakenor Auto Truck Salvage, Inc. (1711)
Waste Discharge Identification (WDID):	6B36I025934
Date Entered Level 1 Status:	July 1, 2020
Facility Name:	LKQ – Acme Truck Parts (1820-A)
Waste Discharge Identification (WDID):	5S39I023389
Date Entered Level 1 Status:	July 1, 2022

"I certify under penalty of law that this document and all Attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, to the best of my knowledge and belief, the information submitted is, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Timothy Klein

*Compliance Group Leader (CGL) / Duly Authorized
Representative (DAR)*

Tim Klein

Signature of CGL / DAR

3/1/2024

Date

Introduction

California's National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Industrial Activity – Order 2014-0057-DWQ (General Permit) requires a Level 1 Exceedance Response Action (ERA) Evaluation and Report to be developed if there are Numeric Action Level (NAL) exceedances as defined in the Industrial General Permit (IGP). This report identifies potential industrial activities that may have contributed to pollutant concentrations above the NALs during the 2016-2017, 2017-2018, 2018-2019, and 2021-2022 reporting years. This Level 1 ERA Report describes the Best Management Practices (BMPs) and revisions to the facility's Storm Water Pollution Prevention Plan (SWPPP) to reduce pollutant concentrations in storm water runoff. This report was prepared in accordance with the requirements of the IGP.

The LKQ Corporation Stormwater Compliance Group was formed to create a group of dischargers with similar industrial activities, pollutant sources, and pollutant characteristics and to share knowledge and implementation of BMPs to reduce those pollutants at each site. This Consolidated ERA Level 1 Evaluation and Report (Consolidated Report) for Total Zinc (Zn) Exceedances was prepared by the Compliance Group Leader (CGL), Timothy Klein, QISP and ToR #901. The Level 1 ERA assessments were conducted during 2017, 2018, 2019, and 2022. For the Compliance Group, in accordance with Section XIV.B.3 of the Permit, "A Compliance Group Leader shall prepare a Consolidated Level 1 ERA Report for all Compliance Group participants with Level 1 status for the same parameter. Compliance Group participants who certify and submit these Consolidated Level 1 ERA Reports are subject to the same provisions as individual Dischargers with Level 1 status, as described in Section XII.C. A Consolidated Level 1 ERA Report is equivalent to a Level 1 ERA Report."

1.0 Facility Information

The primary function at the LKQ Corporation participant sites consists of automotive dismantling and parts recycling. Two sites in the LKQ Corporation Stormwater Group were identified in the Water Board's Storm Water Multiple Application and Report Tracking System (SMARTS) as moving from baseline status to Level 1 status for Zn Annual Average exceedances compared with the NALs identified in the permit during the 2021-2022 reporting year. The participant sites are listed in the following table, which includes participant sites that were already in Level 1 for Zn prior to the 2021-2022 reporting year.

Facility Name	LKQ Pick Your Part - Monrovia (1281)
Address	3333 South Peck Rd, Monrovia, CA 91016
WDID	4 19I010791
SIC Code(s)	5015
Designated LRP	Ed Flores
Phone Number	(951) 232-9653
E-mail Address	erflores@LKQcorp.com

Facility Name	LKQ Pick Your Part - Oceanside (1286-A)
Address	2315 Carpenter Road, Oceanside, CA 92058
WDID	9 371025964
SIC Code(s)	5015
Designated LRP	John Cruz
Phone Number	(442) 288-3933
E-mail Address	jcruz@LKQCorp.com
Facility Name	LKQ – Pick Your Part, Thousand Palms #1289
Address	27600 N. Sierra Del Sol Road, Thousand Palms, CA 92276
WDID	7 331025935
SIC Code(s)	5015
Designated LRP	Veronica Chavez
Phone Number	(442) 262-7489
E-mail Address	vxchavez@LKQCORP.com
Facility Name	LKQ – Pick Your Part #1290
Address	3760 Pyrite Street, Jurupa Valley, CA 92509
WDID	8 331023435
SIC Code(s)	5015
Designated LRP	Veronica Chavez
Phone Number	(442) 262-7489
E-mail Address	vxchavez@LKQCORP.com
Facility Name	LKQ Lakenor Auto Truck Salvage, Inc. (#1711)
Address	11200 Alden Road, Adelanto, CA 92301,
WDID	6B361025934
SIC Code(s)	5015
Designated LRP	Nick Castillo
Phone Number	(209) 345-0204
E-mail Address	nidcastillo@LKQCORP.com

Facility Name	LKQ – Acme Truck Parts (1820-A)
Address	1016 South Wilson Way, Stockton, CA 95205
WDID	5S39I023389
SIC Code(s)	5015
Designated LRP	Johnny Farah
Phone Number	415-525-2282
E-mail Address	jfarah@lkqcorp.com

2.0 QISP Information

The IGP requires the discharger to enlist the services of a Qualified Industrial Stormwater Practitioner (QISP) to assist with the ERA Level 1 Evaluation and prepare the ERA Level 1 Report. Information related to the QISP assisting with this evaluation and report are included below.

Name: Timothy Klein

QISP/Tor Cert. Number: 00901

Affiliation: LKQ Corporation

Phone Number: 858-997-4939

E-mail Address: taklein@lkqcorp.com

Scope of Services Provided: ERA Level 1 Evaluation and Report

3.0 Summary of Numeric Action Level (NAL) Exceedances

The following table summarizes the NAL exceedance(s) being addressed in this Level 1 ERA Evaluation and Report.

Site	Parameter Exceeded ¹	Reporting Year	Annual NAL Exceedance	Data Summary Used to Calculate Annual Average NAL Exceedance		
				# of Samples	Sum of Results	Discharge Point(s)
1281	Zn	2021-2022	0.356 mg/L	3	1.067 mg/L	Outfall 1
1286-A		2016-2017	0.409 mg/L	3	1.226 mg/L	Outfall 1
1289		2018-2019	0.359 mg/L	1	0.359 mg/L	Outfall 1
1290		2018-2019	0.287 mg/L	1	0.287 mg/L	Outfall 1
1711		2017-2018	1.19 mg/L	1	1.19 mg/L	Outfall 1
1820-A		2021-2022	0.3730 mg/L	1	0.3730 mg/L	Outfall 1

¹NAL exceedances summarized in this table are consistent with SMARTS.

4.0 SWPPP Review

The SWPPPs were reviewed to assess compliance with requirements outlined in Section X of the IGP. This review includes all sections of the SWPPPs, including the site map, monitoring implementation plan, potential pollutant generating activities, and BMP selection and implementation. The table below summarizes the review.

Site	SWPPP (General Permit Section)	SWPPP Page # or Reference Location	Date Implemented or Last Revised	Comments
1281	Stormwater BMPs (Section X.H)	§3.0	November 2023	Section 3.0 in each of the SWPPPs was updated to include the additional Level 1 ERA BMPs listed in this report.
1286-A			November 2023	
1289			September 2023	
1290			December 2021	
1711			September 2023	
1820-A			November 2023	

5.0 Evaluation/Identification of Potential Pollutant Sources

Pollutant source evaluation for each parameter exceeding an NAL are summarized in **Section 3.0** above. Findings related to the evaluation are summarized below.

Parameter Exceeded	Potential Source/Activity Generating Exceedance	Likely Source	Existing BMPs to Address the Source
Total Zinc	- Naturally occurring metals are found within soil/gravel at the site; - The inventory of vehicles being held in storage throughout the yard; - Automotive crushing and scrap activities; - On-site structures, equipment, and fencing; - Airborne dust and particulate deposition from on- and off-site locations.	- Industrial - Natural Background	- Employee training - Good housekeeping - Preventative maintenance - Material handling and waste management - Spill and leak prevention and response - Erosion and sediment control - Overhead cover - Storm water treatment systems - Dust control - Gravel swales - Vegetated swales - Retention basins - Work conducted indoors when possible

Based on the evaluation, is additional investigation and/or monitoring necessary to identify the potential pollutants source(s)? ☐ Yes ☒ No

If yes, document the specific parameter and the additional investigation/monitoring needed to establish the pollutant source in the table below.

Parameter	Additional Investigation/Monitoring	Goal/Objective
N/A	N/A	N/A

6.0 Minimum BMP Evaluation

An evaluation of the Minimum BMPs (IGP Section X.H.1) included in the SWPPP was performed to assess if adequately implemented at the site, particularly for those areas identified as potential pollutant sources in **Section 5.0** of this report. Minimum BMP deficiencies are identified in the table below.

Site	Deficiency Noted
1281	Minor to moderate amounts of car parts were observed on the ground in the Retail Sales Yard.
1286-A	Stains were observed near the Tire Breaking Area and on the ground within the Vehicle Storage Area. A moderate amount of car parts was observed on the ground in the Vehicle Storage Area.
1289	A minor amount of staining was observed on the ground at the Fluid Draining and Hazardous Waste Accumulation Area.
1289	A minor amount of car parts was observed on the ground throughout the Vehicle Storage Area and near the crusher. Vehicle crushing is currently conducted on soil. Multiple containers were observed missing a form of secondary containment. The 500-gal Red Dyed Diesel AST was observed with a significant amount of rims within the tank's bermed area. The berm was also observed broken. Monthly stormwater visual observation inspections were not observed completed since June 2022. The last annual SWPPP/SPCC training occurred on 05/26/2022 and so the current LRP has not yet received annual training.
1290	Not all locations as described in Table 3-4 of the SWPPP are being inspected in their monthly storm water investigations. The SWPPP and SPCC annual training was conducted, however, the new LRP was not present.
1711	Moderate amounts of trash, sediment, and debris observed around the stormwater drain inlets on the east side of the site. Significant amounts of sediment surround the drain inlets in the north side of the main building. Moderate amounts of trash and parts were observed near the outfall. Moderate amounts of spills and staining observed on the ground in the west side of the Dismantling Area. Moderate amounts of car parts were observed throughout the yard due to day-to-day operations. A degreaser tote was observed located within a few feet of an open door without secondary containment. Moderate amounts of water and sediment from the parts washer was observed leaking into the secondary containment of the propane tank.
1820-A	Stains observed on the ground in the Shear and Covered Parts Storage Areas.

7.0 Advanced BMPs

An evaluation of any Advanced BMPs (IGP Section X.H.2) was performed to assess if adequately implemented at the site. Advanced BMPs deficiencies are identified in the table below.

Site	Deficiency Noted
1281	Trash was observed accumulating in the stormwater swale at the southern perimeter of the site.
	Tires and empty containers were observed accumulating in the stormwater swale east of the Scrap/Crushing Area.
	Some gravel bags, silt socks, and absorbent booms were observed dirty in the stormwater swale.
1286-A	Leaves and debris were observed near the outfall and in the stormwater treatment system.
	A bag containing a stockpile of filter media for the stormwater treatment system was observed torn open.
1711	Significant amounts of materials were stored around the detention basin.
1820-A	One storm drain was observed without a tarp beneath it to minimize the amount of dirt that can enter.

8.0 Additional BMPs Selected for Implementation

Based on the pollutant source evaluation and evaluation of existing BMPs implemented at the site, the following additional BMPs or improvements to existing BMPs will be implemented to control pollutants generated from on-site industrial activities. Sections of the SWPPP will be revised to reflect the additional BMPs identified below.

Parameter Exceeded	Additional BMP(s) Implemented to Address Exceedance	Site	Date Implemented or Schedule for Implementation	SWPPP Section
Total Zinc	Install Filtrexx Metaloxx at outfalls in addition to existing metal/oil booms	1281	June 2023	Section 3.0
	Hydraulic Study and wall repair	1286-A	October 2023	
	Additional employee training focused on revised BMP deployment and associated operations and maintenance activities.			
	Conducting a detailed review and evaluation of treatment control and media filtration BMP effectiveness in reducing metals to guide future BMP upgrades.			
	Additional BMP maintenance and improvements targeting the removal of metals	1289 1290 1711 1820A	October 2023	

9.0 Modification to Existing Monitoring Implementation Program (MIP)

The following are changes or modifications made to the monitoring program, if any, in response to this evaluation. Modifications could be related to monitoring locations, sampling methodology, sampling frequency, and analytical parameters. Goals/objectives of monitoring program changes and how they relate to potential BMP improvements are listed below.

Additional Investigation(s)/Modification(s)	Goal/Objective
N/A	N/A

10.0 Evaluation and Report Completion/Submittal Information

1281 10/7/2022; 1286-A 9/15/2016; 1289 1/1/2020;
Date ERA Level 1 Evaluation Completed: 1290 8/26/2019; 1711 8/14/2018; 1820-A 3/25/2022
Date BMP Implementation Complete: June-October 2023
Date ERA Level 1 Report Certified and Submitted: 2/7/2024

APPENDIX A

Summary of Stormwater Results

2021-2022 Summary of Stormwater Discharge Sampling Results

LKQ Pick A Park 1281

3333 South Peck Road

Monrovia, California

Constituents		pH	TSS	O&G	Al	Cu	Fe	Pb	Zn
Unit		pH units	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Permit Limits	Instantaneous Maximum NAL	6.0-9.0	400	25	NA				
	Annual NAL	NA	100	15	0.75	0.0332	1.0	0.262	0.26
Sample Date	Location(s)								
25-Oct-2021	Outfall 1	7.90	189	ND<0.486	3.22	0.111	3.82	0.107	0.387
14-Dec-2021	Outfall 1	7.80	102	9.40	1.33	0.0690	4.02	0.0481	0.344
28-Mar-2022	Outfall 1	7.95	83.3	6.85	3.24	0.0838	4.15	0.0509	0.336

Annual Average:	NA	125	5.4	2.60	0.0879	4.00	0.069	0.356
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Notes: TSS - Total Suspended Solids

O&G - Oil and grease

Al - Aluminum

Cu - Copper

Fe - Iron

Pb - Lead

Zn - Zinc

NA - Not available; not analyzed

mg/L - milligrams per liter

NAL - Numeric Action Level

200 Results reported at or above (outside) the NAL

2016-2017 Summary of Stormwater Discharge Sampling Results

LKQ Pick Your Part 1286A

2315 Carpenter Road

Oceanside, California

Constituents		pH	TSS	O&G	Al	Fe	Pb	Cu	Zn
Unit		pH units	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Permit Limits	Instantaneous	6.0-9.0	400	25	NA				
	Maximum NAL								
	Annual NAL	NA	100	15	0.75	1.0	0.262	0.0332	0.26
Sample Date	Location(s)								
27-Nov-2016	Outfall 1	NS	118	13.3	2.33	0.744	0.0289	0.0974	0.245
16-Dec-2016	Outfall 1	7.2	41	8.8	0.704	1.07	0.0107	0.0747	0.161
9-Jan-2017	Outfall 1	6.8	482	23.2	12.3	19.1	0.120	0.172	0.820
19-Jan-2017	Outfall 1	6.2	104	9.0	2.29	3.25	0.0264	NA	NA

Annual Average: NA 186 13.6 4.41 6.04 0.0465 0.1147 0.409

Notes: TSS - Total Suspended Solids

O&G - Oil and grease

Al - Aluminum

Cu - Copper

Fe - Iron

Pb - Lead

Zn - Zinc

NS - Not Sampled

NA - Not available; not analyzed

mg/L - milligrams per liter

NAL - Numeric Action Level

200 Results reported at or above (outside) the NAL

2018-2019 Summary of Stormwater Discharge Sampling Results

LKQ Pick Your Part 1289

27600 North Sierra Del Sol Road

Thousand Palms, California

Constituents		pH	TSS	O&G	Al	Cu	Fe	Pb	Zn
Unit		pH units	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Permit Limits	Instantaneous Maximum NAL	6.0-9.0	400	25	NA				
	Annual NAL	NA	100	15	0.75	0.0332	1.0	0.262	0.26
Sample Date	Location(s)								
2-Feb-2019	Outfall 1	8.4	447	1.5	3.96	0.0574	7.34	0.0889	0.359

Annual Average: NA 447 1.5 3.96 0.0574 7.34 0.0889 0.359

Notes: TSS - Total Suspended Solids
O&G - Oil and grease
Al - Aluminum
Fe - Iron
Pb - Lead

NA - Not available; not analyzed
mg/L - milligrams per liter
NAL - Numeric Action Level
200 Results reported at or above (outside) the NAL

2018-2019 Summary of Stormwater Discharge Sampling Results
LKQ Pick A Part 1290
3760 Pyrite Street
Riverside, California

Constituents		pH	TSS	O&G	Al	Cu	Fe	Pb	Zn
Unit		pH units	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Permit Limits	Instantaneous Maximum NAL	6.0-9.0	400	25	NA				
	Annual NAL	NA	100	15	0.75	0.0332	1.0	0.262	0.26
Sample Date	Location(s)								
4-Feb-2019	Outfall 1	NA	239	0.96	5.70	0.0521	7.59	0.146	0.287

Annual Average: NA **239** 0.96 **5.70** **0.0521** **7.59** 0.146 **0.287**

Notes: TSS - Total Suspended Solids
O&G - Oil and grease
Al - Aluminum
Cu - Copper
Fe - Iron
Pb - Lead

Zn - Zinc
NA - Not available; not analyzed
mg/L - milligrams per liter
NAL - Numeric Action Level
200 Results reported at or above (outside) the NAL

2017-2018 Summary of Stormwater Discharge Sampling Results
LKQ Lakenor Auto Truck Salvage, Inc. 1711
11200 Alden Road
Adelanto, California

Constituents			pH	TSS	O&G	Al	Fe	Cu	Zn	Pb
Unit			pH units	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Permit Limits	Instantaneous Maximum NAL		6.0-9.0	400	25	NA				
	Annual NAL		NA	100	15	0.75	1.0	0.0332	0.26	0.262
Sample Date		Location(s)								
9-Jan-2018		Outfall A	NA	7660	3.2	60.7	16.6	0.208	1.19	0.465

Annual Average:	NA	7660	3.2	60.7	16.6	0.208	1.19	0.465
------------------------	----	------	-----	------	------	-------	------	-------

Notes:

TSS - Total Suspended Solids	Zn - Zinc
O&G - Oil and grease	NA - Not available; not analyzed
Al - Aluminum	mg/L - milligrams per liter
Cu - Copper	NAL - Numeric Action Level
Fe - Iron	200 Results reported at or above (outside) the N.
Pb - Lead	

2021-2022 Summary of Stormwater Discharge Sampling Results
LKQ ACME Truck Parts 1820A
1016 South Wilson Way
Stockton, California

Constituents		pH	TSS	O&G	Al	Fe	Pb	Cu	Zn
Unit		pH units	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Permit Limits	Instantaneous Maximum NAL	6.0-9.0	400	25	NA				
	Annual NAL	NA	100	15	0.75	1.0	0.262	0.0332	0.26
Sample Date	Location(s)								
23-Dec-2021	Outfall 001	6.8	296	8.91	10.1	15.1	0.0728	0.136	0.3730

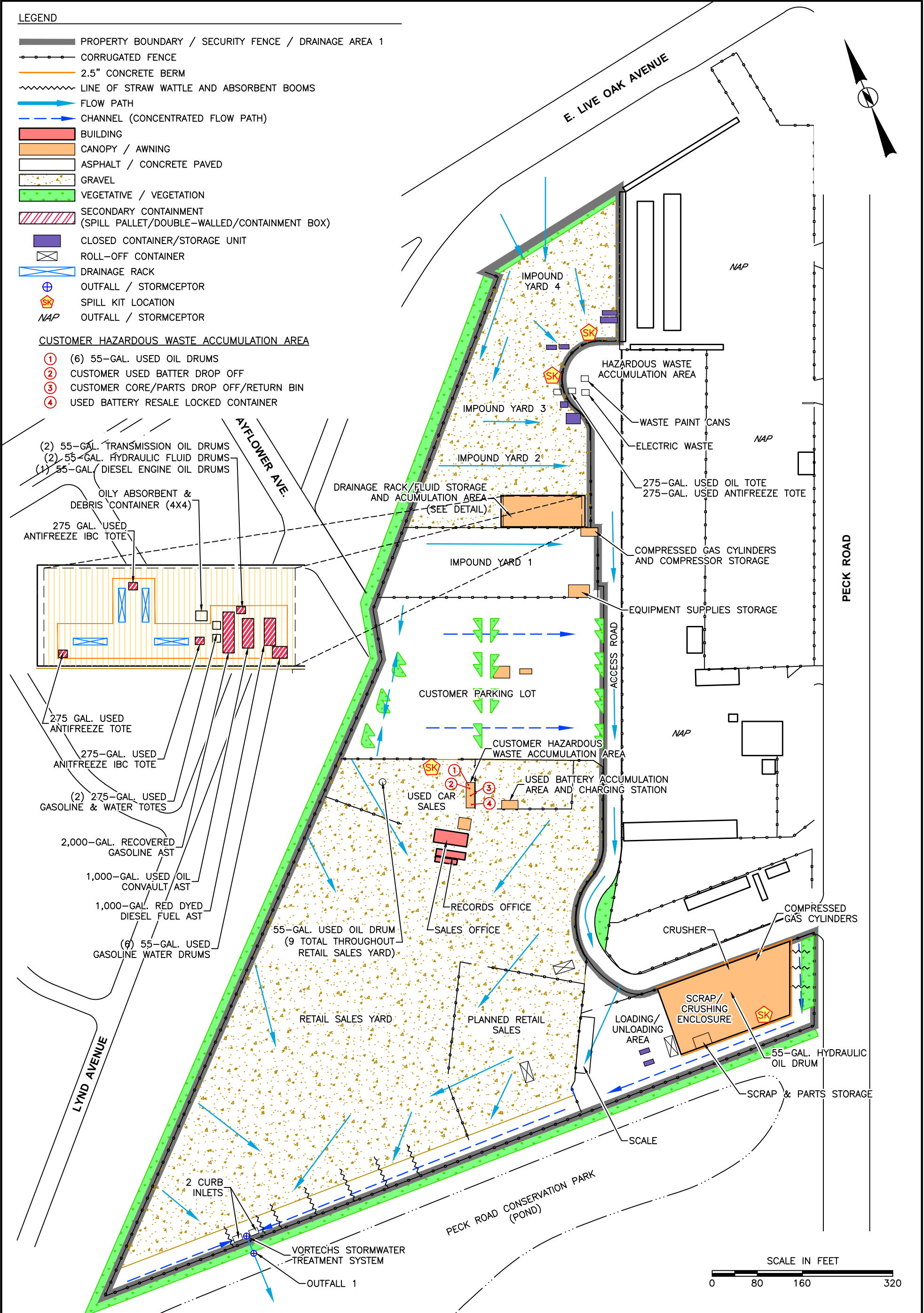
Annual Average:	NA	296	8.91	10.1	15.1	0.0728	0.136	0.3730
------------------------	-----------	------------	-------------	-------------	-------------	---------------	--------------	---------------

Notes: TSS - Total Suspended Solids
O&G - Oil and grease
Al - Aluminum
Cu - Copper
Fe - Iron
Pb - Lead

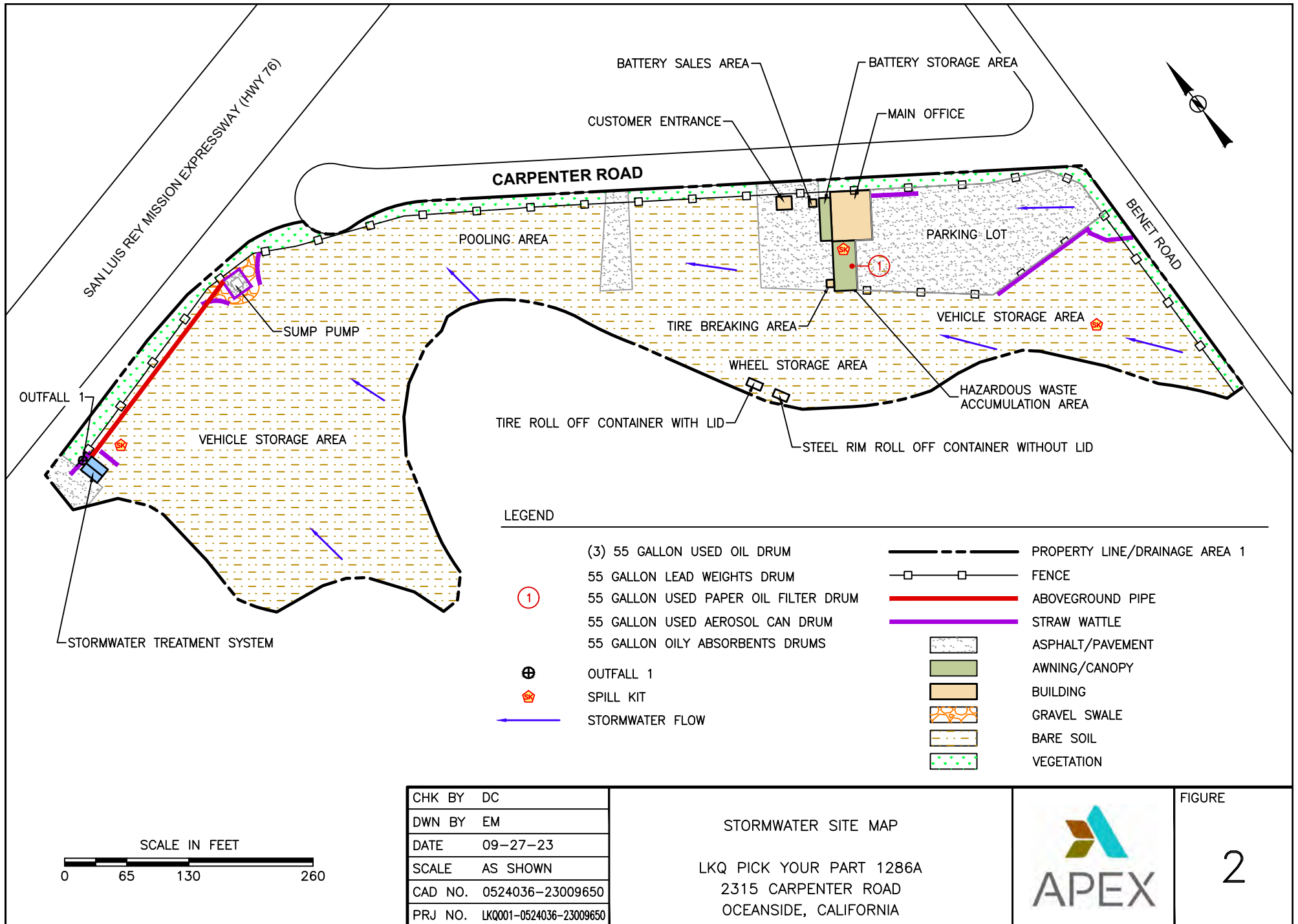
Zn - Zinc
NA - Not available; not analyzed
mg/L - milligrams per liter
NAL - Numeric Action Level
200 Results reported at or above (outside) the NAL

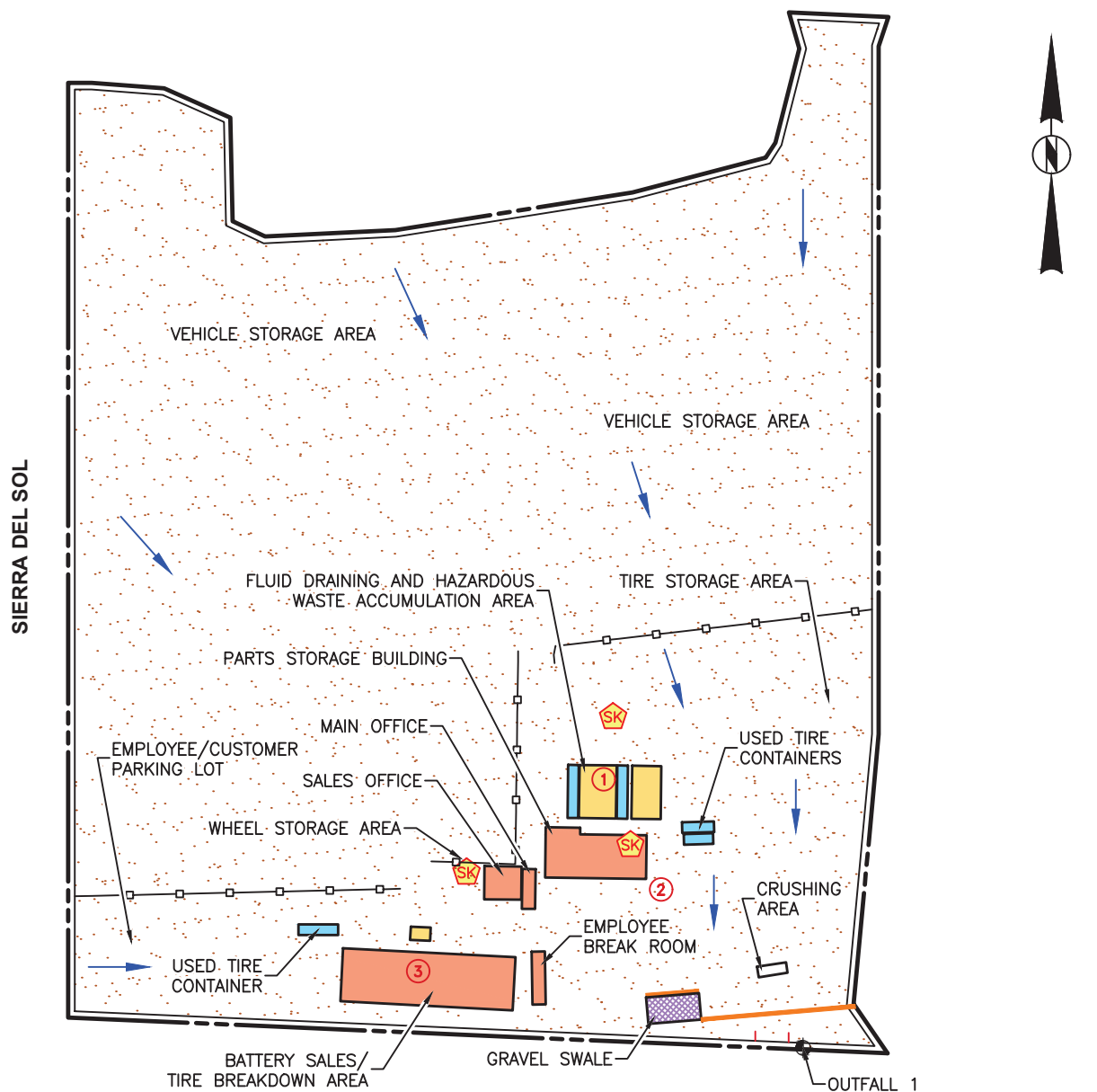
APPENDIX B

Site Maps



CHECK BY DC	SPCC SITE PLAN LKQ #1281 – PICK A PART MONROVIA 3333 SOUTH PECK ROAD MONROVIA, CALIFORNIA		FIGURE 1
DRAWN BY EM			
DATE 11-04-23			
SCALE AS SHOWN			
CAD NO. 0524036-23009382			
PRJ NO. LKQ001-0524036-23009382			





LEGEND

- Site Boundary/Drainage Area 1
- Fence
- Gravel Bags
- Straw Wattle
- Flow Direction
- SK Spill Kit
- ⊙ Outfall 1

- Building
- Awning/Canopy
- Container/Roll-Off
- Soil
- Gravel Swale

- ① 1,000 Gallon Gasoline ASTs #1 & #2
1,000 Gallon Used Oil AST #3
240 Gallon Waste Anti-Freeze ASTs #5 & #6
120 Gallon Used Oil AST #8
55 Gallon Virgin Anti-Freeze Drums #1 & #2
55 Gallon Virgin Transmission Fluid Drum #3
55 Gallon Virgin Hydraulic Fluid Drum #4
55 Gallon Virgin Heavy Duty Diesel Engine Oil Drum #5
- ② 500 Gallon Red Dyed Diesel AST #4
- ③ 120 Gallon Used Oil AST #7

SCALE IN FEET

0 65 130 260

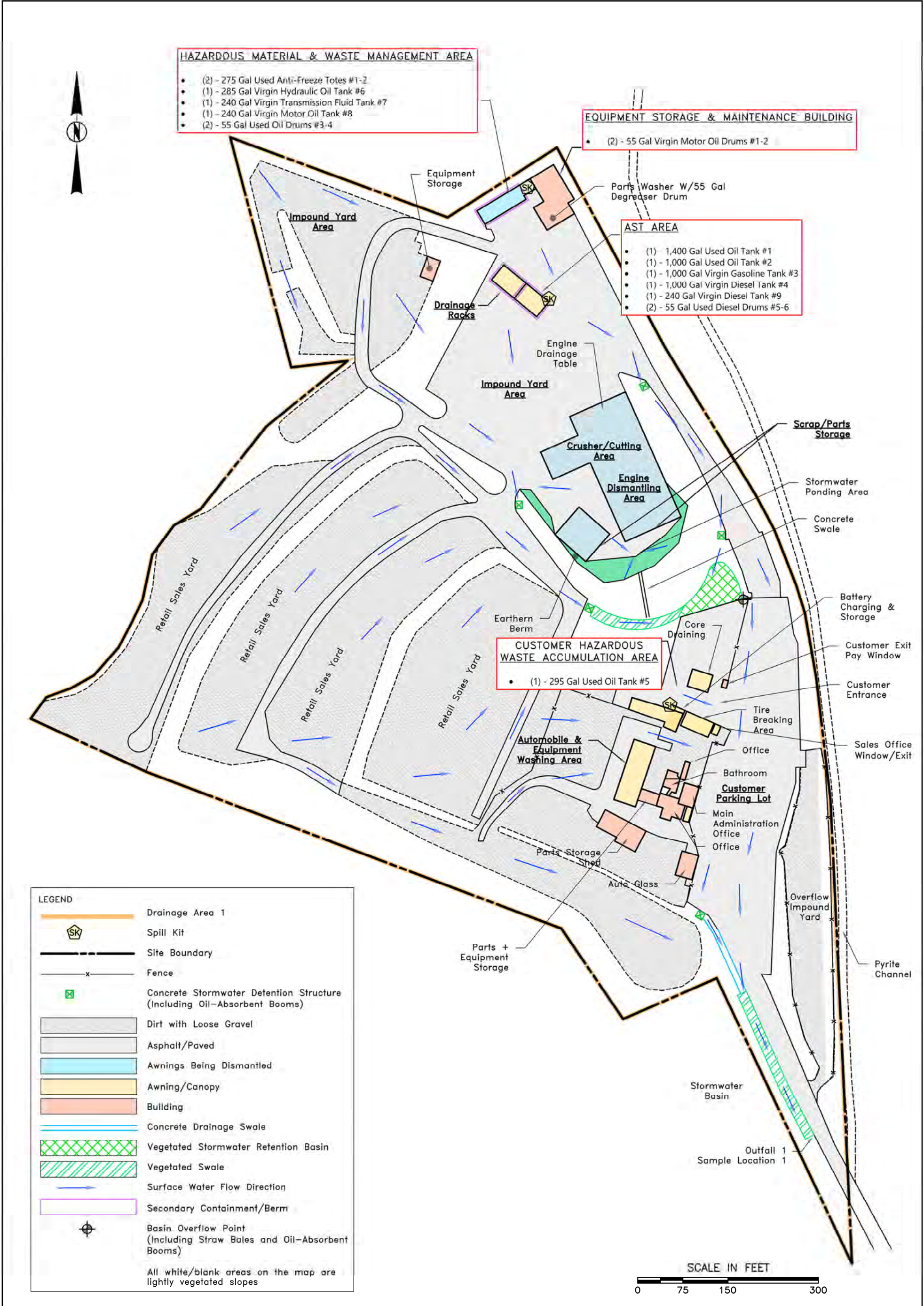
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DRAWN BY EM
DATE 08-24-23
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PRJ NO. LK001-0524036-23009206

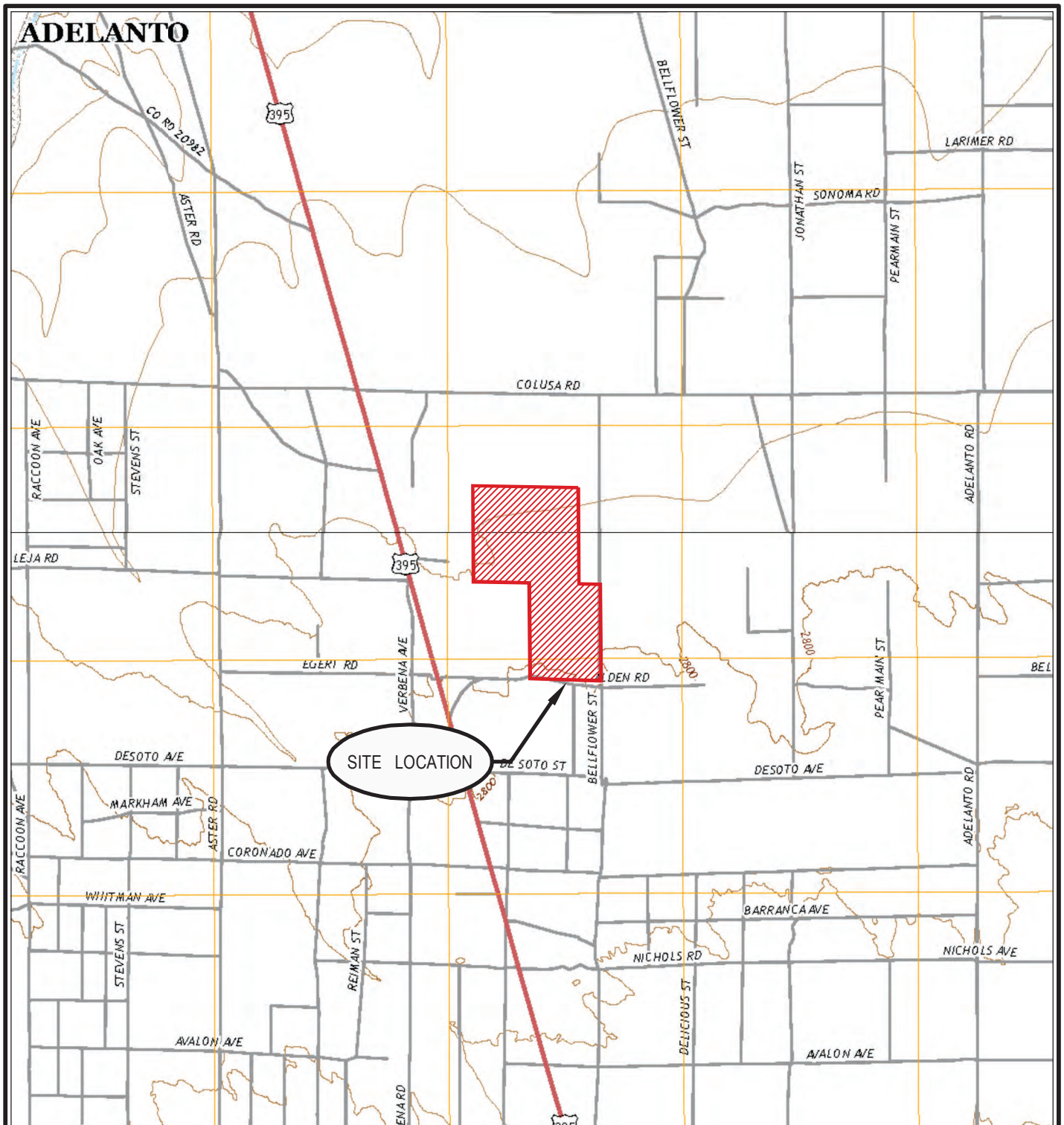
SITE PLAN
LKQ PICK YOUR PART THOUSAND PALMS
27600 SIERRA DEL SOL
THOUSAND PALMS, CALIFORNIA



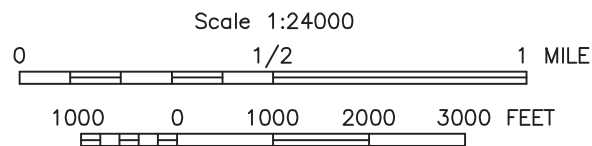
FIGURE

3





QUADRANGLE LOCATION



(SOURCE OF MAP IS USGS 7.5 MINUTE QUADRANGLE MAP, ADELANTO (2018) AND VICTORVILLE NW (2018), CALIFORNIA)



CHECK BY	NR
DRAWN BY	OS
DATE	12-7-20
SCALE	AS SHOWN
CAD NO.	LKQ1711-SWPPPA
PRJ NO.	LKQ1711-SWPPP2001

SITE LOCATION MAP

LKQ LAKENOR AUTO & TRUCK SALVAGE, INC.

11200 ALDEN ROAD

ADELANTO, CALIFORNIA



FIGURE

5

