

# 1<sup>st</sup> STOP CHECKLIST: MOTOR VEHICLE SALVAGE DEALER

## REQUIREMENTS & REGULATIONS

- [] Permits for junkyards are issued locally. Contact the county auditor or the chief executive officer of the municipality where the junkyard will be located.
- [] Motor vehicle salvage dealers must have a motor vehicle salvage dealer's license from the Ohio Bureau of Motor Vehicles. Contact the **Ohio Bureau of Motor Vehicles' Dealer Licensing Division** at **(614) 752-7636**. Information and forms are on-line at [www.bmv.ohio.gov/](http://www.bmv.ohio.gov/). *\*Remember to check local government agencies.\**
- [] You may need a **commercial driver's license**. Contact the **Ohio Bureau of Motor Vehicles (BMV)** at **(614) 752-7500** for more information. The BMV is on-line at [www.bmv.ohio.gov](http://www.bmv.ohio.gov). *\*Remember to check local government agencies.\**
- [] Contact the **Ohio Environmental Protection Agency (EPA)** for information about the proper disposal of hazardous and solid waste. The EPA can be reached at **(614) 644-3020 for General Inquiries** or **(800) 329-7518 for Office of Compliance Assistance and Pollution Prevention**. The Ohio EPA is also on-line at [www.epa.state.oh.us](http://www.epa.state.oh.us). *\*Remember to check local government agencies.\**
- [] You must collect sales tax on all retail sales (sales to an end user), including salvage. You need a **VENDOR'S LICENSE**. Contact **YOUR COUNTY AUDITOR** or Information is also on-line at <http://business.ohio.gov>.
- [] If you have questions about sales tax, contact the **OHIO DEPARTMENT OF TAXATION** at **(888) 405-4039 for Business Tax Assistance; (888) 405-4089 for Tax Registration; or (800) 282-1782 for the Forms Request Line**. Information is also on-line at <http://tax.ohio.gov>. *\*Remember to check local government agencies.\**
- [] Trucks with three or more axles, commercial tractors with two or more axles, and two axle trucks with a trailer that weighs at least 3,000 pounds when empty and travel *in-state only* must have a **fuel use tax permit**. Trucks that travel *outside of the state* must have an **Ohio International Fuel Tax Agreement (IFTA) Account** with the Ohio Department of Taxation. If you have questions, contact the **Ohio Department of Taxation's Fuel Use Tax Section** at **(614) 466-3921**. Information is also on-line at <http://tax.ohio.gov>. *\*Remember to check local government agencies.\**
- [] **Storage tanks** must be inspected before use. Contact the local fire authority or the **State Fire Marshal**. The State Fire Marshal's Office can be reached at **(614) 752-8200** and is also on-line at <http://www.com.ohio.gov/fire/>. *\*Remember to check local government agencies.\**

## Ohio Hazardous Waste

# Notifier

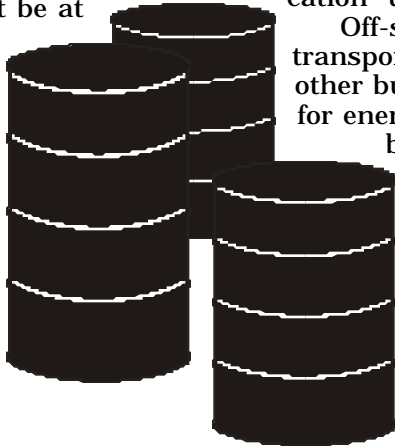
A Publication of Ohio EPA, Division of Hazardous Waste Management

## Are You Transporting Used Oil Off-Site to be Burned for Energy Recovery?

If your business generates and/or transports used oil off-site to be burned for energy recovery, you may be subject to the used oil regulations found in Ohio Administrative Code (OAC) Chapter 3745-279. How Ohio's used oil regulations apply to generators, transporters, and burners of used oil that is going to be burned for energy recovery depends on whether or not the used oil meets the specifications found in OAC rule 3745-279-11 (see <http://www.epa.state.oh.us/dhwm/dhwmrules/279-11.pdf>).

For used oil to be considered "on-specification" fuel, its constituent levels must be at or below (except for flash point) the following levels:

- 5 ppm or less of arsenic
- 2 ppm or less of cadmium
- 10 ppm or less of chromium
- 100 ppm or less of lead



- 100° F minimum flash point
- 4,000 ppm or less of total halogens
- less than 2 ppm PCBs.

Used oil that has been proven to meet these specifications and is burned for energy recovery is not subject to Ohio's used oil requirements. However, the person making the claim that the used oil meets the specifications must keep records of the analysis that the used oil meets the specification and a record of all shipments. Used oil which does not meet the specifications is called "off-specification" used oil.

Off-specification used oil transported off-site to another business that burns it for energy recovery must be burned in a boiler or an industrial furnace as described in OAC rule 3745-279-61 (see <http://www.epa.state.oh.us/dhwm/dhwmrules/27961.htm>). Off-specification used

oil transported off-site to another person's business cannot be burned for energy recovery in a space heater.

Therefore it is important for used oil generators that self-transport their used oil to be burned for energy recovery off-site to know the energy recovery device(s) used to burn the used oil. However, you can burn off-specification used oil that you generate or that is generated by household do-it-yourselfers in a space heater that you own, provided that the space heater has a capacity of less than 0.5 million BTU per hour and you vent it to the outside air. You can also burn used oil that you generate at other businesses you own.

Additionally, you can transport amounts of 55 gallons or less without complying with the used oil transporter requirements. But if you transport more than 55 gallons at a time, you must comply with the used oil transporter requirements in OAC rules 3745-279-40 through 3745-279-47 (see <http://www.epa.state.oh.us/dhwm/dhwmrules/index1.htm>).

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## Used Oil continued from page 1

If your business transports used oil off-site to a used oil burner or a used oil processor/rerefiner, you are a used oil transporter. As a used oil transporter, you must obtain a U.S. EPA identification number from Ohio EPA, determine if the used oil is on- or off-specification, comply with all Department of Transportation requirements, manage all residues from transporting, and retain all records of shipments and deliveries. It is possible, however, to transport used oil and not be subject to these requirements if you are transporting used oil on-site, or if you are the generator of the used oil and are transporting less than 55 gallons of used oil to a collection center or aggregation point.

If you transport or have someone else transport a shipment of off-specification used oil directly to a used oil burner, you are a used oil fuel marketer. Used oil fuel marketers must obtain a U.S. EPA identification number from Ohio EPA, must only initiate shipments to a used oil burner that has a U.S. EPA identification number, must only send shipments to a used oil burner who burns the used oil in an industrial furnace or boiler, and must keep records of each shipment of used oil to that burner.

For additional information on Ohio's used oil regulations, please call (614) 644-2917 and ask to speak with someone in the regulatory and information services unit or visit our Web page to view our three used oil fact sheets at <http://www.epa.state.oh.us/dhwm>.



## Can Construction, Renovation or Demolition Debris be a Hazardous Waste?

**D**ebris generated from construction, renovation or demolition of buildings (with a few exceptions) that is destined for disposal is a waste as defined in Ohio's hazardous waste rules. Anyone who generates a waste must evaluate that waste to determine if it is a hazardous waste. If the debris is generated from remodeling or demolition of a household, it is exempt from regulation as a hazardous waste and may be disposed of in a construction and demolition debris (C&DD) landfill. In addition, wastes generated during the abatement of lead-based paint at households is exempt from regulation as a hazardous waste (please see our fact sheet on lead abatement wastes at <http://www.epa.state.oh.us/dhwm/pdf/LeadAbatementFactsheet.pdf>).

You must evaluate non-household waste generated from demolition, renovation or construction before disposal. Your evaluation may include any knowledge you have concerning the materials that were used in construction of the building and analyses of representative samples of the waste.

If you would like more information about waste evaluation please see the Summer 2002 "Ask the Inspector" article at <http://www.epa.state.oh.us/dhwm/pdf/Summer2002Notifier.pdf>.

If you would like to know more about representative sampling of construction, demolition and renovation waste please refer to the following Web sites:

- ASTM Standard E 1908-97: Standard Guide for Sample Selection of Debris Waste from

a Building Renovation or Lead Abatement Project for Toxicity Characteristic Leaching Procedure (TCLP) Testing for Leachable Lead (Pb) at <http://www.astm.org/>

- Evaluation strategies on the Washington State Department of Ecology Web site at [http://www.ecy.wa.gov/programs/hwtr/demodebris/pages2/sample\\_plans.html#Screen/](http://www.ecy.wa.gov/programs/hwtr/demodebris/pages2/sample_plans.html#Screen/)

Lead-based paint is the most common contaminant found in buildings that could cause waste to be defined as hazardous. Other components that may also be hazardous and should be removed prior to demolition are fluorescent lamps and thermostats that contain mercury, another hazardous constituent. We suggest that you consider having both of these components recycled. Older fluorescent light fixtures may contain ballasts that contain PCBs. Steel structural components, lead pipes and electrical components may also be recycled as scrap metal without regulation under the hazardous waste rules. When you recycle these items you are subject to fewer regulations.

We have also recently become aware that a polymer marketed as TARTAN® by the 3M company contains mercury that can potentially be hazardous waste because of its mercury content. This polymer was used in the 1970s and 1980s for gymnasium floors and tracks. If you are demolishing a school or recreation center, you should take care to evaluate any gymnasium floors that are present.

## Electronic Records

**I**n the past few years, many businesses have replaced paper record keeping with electronic record keeping. Recently, hazardous waste inspectors have been receiving some questions from waste handlers and facilities regarding electronic record keeping. Most questions have focused on the acceptability of storing compliance records electronically.

### Background

Currently, Ohio EPA accepts Generator Annual Reports, Facility Annual Reports and Annual Ground Water Monitoring Reports electronically in a prescribed format. Some handlers continue to track and document compliance-related activities on paper, others use a mix of both paper and electronic record keeping. Some treatment, storage and disposal (TSD) facilities are using bar-coding systems that allow our inspectors to determine the location and disposition of a specific container within a regulated unit as required by the operating record rule.

According to hazardous waste field inspectors, some of the electronically-maintained records include:

- **waste analysis records** (waste profiles, analytical laboratory reports for TSD facilities)
- **waste evaluation records** (analytical laboratory reports, material safety data sheets (MSDS) for waste handlers)
- **waste inventory records** (logs for tracking the duration of wastes being stored, barcoding systems for tracking wastes managed at a TSD facility)



- **personnel training records** (dates of required annual training and list of attendees)
- **inspection records** (inspection of regulated units and required emergency equipment)
- **waste shipment records** (manifests, land disposal restriction (LDR) notifications, tolling agreements)
- **customer information** (type of industry, facility contacts, billing invoices for TSD facilities)
- **ground water monitoring data** (quarterly and annual report information)

### Current Electronic Regulatory Initiatives

There are currently several regulatory initiatives addressing electronic record keeping that waste handlers, facilities and inspectors should keep updated on because they may impact how records are maintained in the future.

#### Uniform Electronic Transactions Act (UETA)

As of December 2002, 41 states have enacted UETA. UETA became effective in Ohio in 2000. The purpose of UETA is to provide for the regulation of electronic records and electronic signatures. It gives electronic signatures and records the same validity and enforceability as manual signatures and paper-based transactions if the requirements of the law are met.

The Ohio Department of Administrative Services (DAS) promulgated OAC rule 123:3-01-1 to



clarify the obligations of state agencies under the statute. The statute and rule together establish a security procedure which requires state agencies to report electronic transactions to DAS, conduct a security assessment of each set of proposed similar electronic transactions, use minimum technology standards and/or security procedures that are appropriate for the levels of security as determined by the security assessment, obtain DAS approval for its proposed procedures or seek a waiver, and establish and maintain documented security policies and procedures. UETA applies to many transactions between parties who agree to conduct their business electronically.

However, the rule applies only to electronic transactions involving a state agency which also: facilitate access to restricted information; purchase, sell or lease goods, services or construction; transfer funds; facilitate the submission of an electronic record or electronic signature required or accepted by a state agency; or create records upon which the state of Ohio or another person will reasonably rely including but not limited to formal communication, letters, notices, directives, policies, guidelines and any other record that is formally issued under a signature.

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## 4.

### Electronic Records continued from page 1

#### **Cross-Media Electronic Reporting & Record Keeping Proposed Rule (CROMERR)**

This proposed rule would provide the legal framework for electronic reporting and record keeping under most of U.S. EPA's environmental regulations. The initial proposed rule comment period ended February 27, 2002. Under CROMERR, U.S. EPA will have to approve each state system for managing electronic reports, presenting each state with the potential of having to revise or even replace existing systems.

However, CROMERR will not create any new authority for U.S. EPA oversight of state programs. After analyzing initial comments on the proposed rule, U.S. EPA decided to separate the electronic reporting from the electronic record keeping. Currently, the states and U.S. EPA are focusing on developing guidance addressing the electronic reporting aspect.

After addressing the electronic reporting, they will move on to the electronic record keeping issues. May 2003 is the target date for promulgating the electronic reporting rule. Implementation guidance will be made available for review by state participants shortly after the final rule is published.

#### **Electronic Manifesting Proposed Rule**

On May 22, 2001, U.S. EPA proposed a rule giving waste handlers who are required to use the manifest form the option to complete, send, and store this information electronically. This rule also proposed changes to the manifest. U.S. EPA proposed these changes to reduce the paperwork burden related to the hazardous waste manifest provisions, and in response to many requests to streamline and update the hazardous waste tracking system. The public comment on this rule ended July 30, 2001.

Currently, the rule is being split into two parts. The first part, that addresses changes to the manifest is expected to be finalized in late 2003. The portion addressing electronic manifesting is undergoing more analysis and is expected to be finalized in late 2004 or early 2005.

It is important to note that once CROMERR is finalized, there may be discrepancies between UETA and CROMERR that will need to be resolved.

### **Commonly Asked Questions**

#### **1. Can a waste handler/TSD facility store compliance records electronically?**

Yes, this is an acceptable format to demonstrate compliance with OAC requirements. However the handler must be able to produce a hard copy of documents required to be kept upon the request of Ohio EPA, unless Ohio EPA has, prior to accepting the electronic record, had the transaction approved or waived by DAS.

#### **2. How should I handle enforcement and/or compliance e-mail correspondences?**

Submittals regarding compliance or enforcement must be made on paper, and any e-mail exchanged regarding enforcement or compliance or contracting matters must be followed by hard copy.

Paper copies are currently the most widely used format in which compliance-related information is supplied to our inspectors. Currently, file cabinets containing paper copies remain the primary data management system for the Agency.

When the public completes a file review, hard copies of all documents should be in the file for



review. It is anticipated that this will change over time with the implementation of Ohio EPA's electronic information management system.

While Ohio EPA cannot dictate to a facility the manner in which it stores its business records, the Agency cannot engage in certain electronic transactions without complying with the DAS approval or waiver procedure.

Any facility that requests "paperless" maintenance of its operating record, for example, needs to be informed that until Ohio EPA has obtained the appropriate DAS approval or waiver, the facility will still be required to submit a paper copy on request. Until the application of UETA and its rule are fully understood and implemented, our approach will continue to be to require submittals of paper copies in compliance or enforcement matters, and that any e-mail exchanged regarding enforcement, compliance or contracting matters be followed by hard copy.

DHWM will continue to monitor the development of various federal and state initiatives and the impacts they may have on our current information management systems, as well as those planned for the future. As new rules and procedures are adopted we will keep you updated. Please contact Jeff Mayhugh or Helen Miller at (614)644-2917 or your inspector with any questions.

## Generator Estimates Savings of \$472,000 by Implementing P2

**I**n 2000, the Division of Hazardous Waste Management (DHWM) and the Office of Pollution Prevention (OPP) conducted a Pollution Prevention (P2) Assessment at Mill's Pride, a manufacturer of hardwood kitchen cabinets located in Waverly, Ohio. The assessment focused on the company's coating application processes which generated large quantities of hazardous waste spent solvents and coatings, as well as spent rags and paint filters.

A recent followup call to the company revealed that several P2 projects were implemented in mid-2002 as a result of our assessment, and that the company will have realized a savings of approximately \$472,000 in the first year after making improvements. These are summarized below.

Ohio EPA identified five suggestions for improving efficiency on several of Mill's Pride's coating lines by decreasing over spray on cabinet parts that were being coated. Based on these suggestions, Mill's Pride chose to install new reciprocators on one of their coating lines.

The reciprocators are a component of the spray gun that has an electric eye which "reads" the edges of the boards, automatically shutting off the spray at the edge of the board. This decreases the amount of over spray that occurs on the coating line.

As a result, Mill's Pride has increased

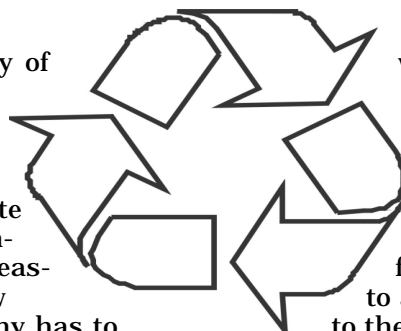
the transfer efficiency of their coating process by an estimated 35 percent, resulting in a similar reduction in the volume of waste generated by the company, as well as decreasing the volume of raw materials the company has to purchase for coating and cleanup.

Mill's Pride is now generating 33 fewer drums of hazardous waste solvents and coatings each month, for an estimated savings of \$27,720 per year in hazardous waste disposal costs. The purchase of 35 percent less stain, top coat, and sealer amount to a savings of \$432,000 per year. Total annual savings from waste disposal and raw materials as a result of installing new reciprocators is approximately \$460,000 per year.

The estimated environmental benefit of reducing coating losses is a 30 percent reduction in total annual volatile organic compound (VOC) emissions, or an annual reduction of 137 tons of VOCs.

Ohio EPA also suggested that Mill's Pride replace disposable filters used in two paint booths with reusable filters, and replace disposable rags used for cleanup with reusable rags.

Together, these two waste streams resulted in the generation and disposal of 14 drums of hazardous waste per month. The company found an industrial launderer



who recovers spent solvent from rags.

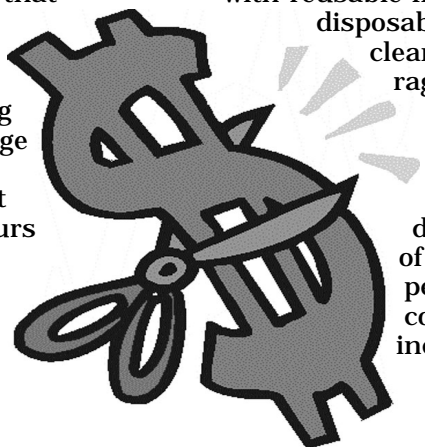
Mill's Pride also purchased plastic reusable filters for one manual paint booth although they found they were unable to apply reusable filters to the other booth due to

the moisture content of their coatings. As a result of these changes in rag and filter use, and the increased life of the disposable filters due to decreased over spray, the company now manifests only five drums of hazardous paint filters per month, and has estimated that it saves \$11,600 per year in purchase and disposal costs.

Mill's Pride continues to evaluate alternative cleaning solvents. Alternative solvents could increase environmental benefits by decreasing air emissions, as well as decrease operating and disposal costs.

Also, based on recommendations made in the P2 assessment report, Mill's Pride has formed a "continuous improvement" work team which meets once per week with the goal of looking at all production processes in order to reduce costs and waste. The team is actively working to identify further reductions in solvent losses, waste generation and other losses on the finish line.

Written by: Donna Goodman, DHWM-SEDO and Debbie Hannah, Mills Pride



## Ask the Inspector:

**Q. Will my facility be cited for potential violations if we have fire extinguishers but no water supply in our hazardous waste storage building?"**

Not necessarily. According to Ohio Administrative Code (OAC) rule 3745-65-31 (see <http://www.epa.state.oh.us/dhwm/dhwmrules/6531.htm>), all facilities must be maintained and operated in such a way to prevent releases of hazardous waste to the air, soil, or surface water which could threaten human health or the environment. OAC rule 3745-65-32 specifies required equipment including communication systems (alarms), phones or two-way radios, fire extinguishers, spill control equipment, and water spray systems unless none of the hazards posed by the hazardous waste handled at the facility require a particular kind of safety equipment (see <http://www.epa.state.oh.us/dhwm/dhwmrules/6532.htm>).

For instance, if your hazardous waste reacts violently with water, overhead water sprinklers would only worsen the situation. In this case, if fire extinguishers are to be used in lieu of water sprinklers but in conjunction with other equipment, the fire extinguishers must be compatible with the hazardous waste managed at your facility.



**Q. Does the registered, independent Professional Engineer (PE) who is required to certify such items as hazardous waste tank assessments and closure certifications need to be registered in Ohio?**

Yes, the engineer required to certify the construction, repair or operation of certain hazardous waste management units and the completion of closure must be registered with Ohio's Engineers and Surveyors Board. According to Ohio law, "no person shall practice or offer to practice the profession of engineering. . . unless such person has been registered. . . under this chapter. . .", (Ohio Revised Code (ORC) section 4733). Additionally, the definition of "professional engineer" provided in Ohio law includes the criteria that such a person be registered under ORC section 4733. It is important to note that the "practice of engineering" is a defined term under ORC 4733.01.

Furthermore, due to the passage of Ohio H.B. 337 (effective August 7, 2002), all public agencies in Ohio have the authority and responsibility to reject engineering plans not prepared by a PE. This provision of Ohio law can be found in ORC section 4733.23. For more information on PE requirements, please contact Ohio's Engineers and Surveyors Board (614-466-3651, [www.ohiopeps.org/](http://www.ohiopeps.org/)).

## FISHing FOR ANSWERS

**Q. How can I verify if a PE is registered to practice in Ohio?**

Ohio's Engineers and Surveyors Board maintains a list of registered engineers and surveyors. By contacting the state board at the number provided above or via the board's Web page, you can learn if a person is registered in Ohio as a PE.

# Motor Vehicle Salvage Yard Initiative

## Background

In July 2002, Central District Office's (CDO) Division of Hazardous Waste Management (DHWM), in cooperation with Ohio EPA's Small Business Assistance Office (SBAO) and the Ohio Auto and Truck Recyclers Association (OATRA), began a campaign to inspect and provide compliance assistance to owners and operators of vehicle salvage yards. Although facilities in this sector are rarely subject to hazardous waste inspections, they have significant potential for environmental harm if waste is poorly managed.

As a first step, SBAO tried to identify the universe of salvage yards, using resources such as the yellow pages on CD-ROM and DHWM inspection records. In addition, Ohio's Bureau of Motor Vehicles (BMV) provided a mailing list from their database of licensed vehicle salvage yards (771 statewide, 69 in the Central Ohio area.)

During the development of the initiative, DHWM and SBAO staff met with OATRA leadership and toured three salvage yards. Information gathered from the initial site visits was used to create an in-house training session to help familiarize the inspection staff with the auto recycling industry. As part of this training, DHWM coordinated information sessions with program staff from the divisions of solid and infectious waste management (DSIWM), air pollution control (DAPC), and surface water (DSW). These sessions provided the DHWM inspectors with some basic cross-training to identify potential compliance issues related to scrap tires, air and storm water management.

DHWM developed a special checklist to help the inspectors gather data on various aspects of environmental compliance, including management of automotive fluids, batteries, tires, and wastewater. In addition, SBAO developed and published a compliance guide, "Environmental Compliance Guide for Motor Vehicle Salvage Yards" (October, 2001). Before any inspections were conducted, the SBAO did a mass mailing of the compliance guidebook to salvage yards statewide.

Finally, Ohio EPA's Chris Cotton and SBAO's Laurie Stevenson and Kirk Nofzinger produced a video titled "Best Management Practices for the Auto Recycling Industry," which was funded by a grant from the Ohio Environmental Education Fund.



The video will be distributed directly to salvage yards statewide as another compliance tool.

It promotes simple, low-cost best management practices (BMPs) that can be used at salvage yards to achieve environmental compliance and stay profitable.

**Table 1: Salvage Yard Statistics**

Material	Initiative Results
<b>Used Oil</b>	60% had labeling violations; 12% had release violations and completed cleanup after the inspection; 48% do not remove and/or drain oil filters
<b>Fuel</b>	All facilities drained and reused fuel from vehicles
<b>Mercury Switches</b>	NO SALVAGE YARD COLLECTED MERCURY SWITCHES
<b>Tires</b>	52% resell or recycle all of their scrap tires; 20% resell some tires but shred the rest with the vehicles; 28% report shredding all incoming tires with the vehicles
<b>Batteries</b>	All facilities recycled batteries, however, there were some labeling/containment issues
<b>Storm water Permits</b>	Not enough information was collected to determine if sites had obtained requisite storm water permits



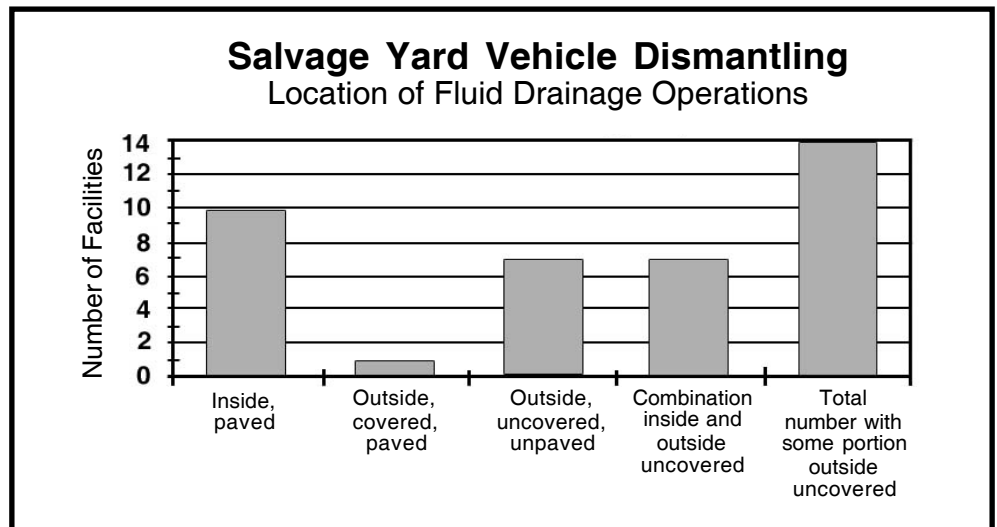
## Inspection Results

Inspectors targeted 40 out of the 69 licensed salvage facilities for inspection. To date, DHWM inspectors have visited 33 vehicle salvage yards. Of these, 25 received full compliance evaluation inspections. The other facilities were closed or not operating active salvage facilities. Table 1 on page 7 presents a summary of the findings of DHWM's inspections to date. Violations were found at 60 percent of the facilities inspected. The most common compliance issues included improper used oil container labeling and used oil releases to the environment.

SBAO's mailing of the guidebook appeared to have some benefit in increasing awareness of the regulations. A number of salvage yard owners mentioned receiving it prior to their inspection and some had already taken steps to improve their compliance based on information in the guidebook.

However, CDO estimates that many of central Ohio's salvage yards are not licensed through BMV. In addition, OATRA, which also provides environmental compliance information, represents only 20 percent of the industry, with approximately 120 members. It's anticipated that salvage yards which are not licensed or affiliated with OATRA receive little or no environmental compliance information. DHWM expects their incidence of non-compliance with environmental rules would be higher.

One of the goals of the initiative was to identify where vehicle dismantling was occurring (indoors versus outdoors) and to promote vehicle dismantling inside buildings through discussions during the inspection. Inspectors found that 40 percent of the sites visited were already working inside.



Over half (56 percent) of the facilities inspected by CDO, however, conducted at least some portion of their dismantling/fluid drainage process outside in an uncovered area. Additionally, at least seven of these sites were conducting such activities over unpaved areas. The graph above provides information regarding the location of dismantling operations at these facilities.

## Future Plans

Over the next several months, DHWM will be inspecting the remaining Central Ohio salvage yards. Inspectors will also be revisiting some salvage yards that were already inspected in an effort to determine the effectiveness and lasting impact of the initiative. DHWM hopes that in addition to correcting violations, many salvage yard owners have become more aware of the importance of environmental compliance and good fluid/waste management practices. As many are finding, compliance is not very costly and in reality it makes good business sense!

One of the challenges that still remains is getting compliance-related information to those facilities which are currently not licensed and/or not affiliated with OATRA. These facilities may ultimately be identified through Ohio EPA's complaint inspection process or discovered while inspectors are in the field. Once identified, our compliance resources can be made available to them.

Additional information about the initiative can be obtained from Lundy Adelsberger in DHWM/CDO at 614-728-3879. If you would like to receive copies of the compliance guide or video, contact SBAO at 614-728-8573 or 800-329-7518. OATRA's Columbus, Ohio phone number is 614-469-0677.

## DHWM's Data Validation Process

The Division of Hazardous Waste Management (DHWM) has developed a data validation process to help inspectors evaluate analytical data submitted by laboratories used by the regulated community as well as the DHWM contracted lab. While this guidance is mainly intended for DHWM's inspectors, you may find it valuable for your data collection activities. DHWM uses environmental data from a number of sources to support its decision-making processes. For example, DHWM often reviews waste evaluation data that will be used to make decisions on how to properly manage waste. Data generated by other activities that may require data validation include data from site closure activities and facilities undergoing corrective action.

Data validation may seem to require a great deal of chemistry knowledge. Actually, it is a process for reviewing data generated by a laboratory and accepting it, qualifying it or rejecting it on the basis of established criteria. The criteria used to assess data are based upon either Quality Control requirements defined by the laboratory or requirements defined by U.S. EPA. Data validation is therefore an important part of a Data Quality Objective process that is necessary to assure that data is generated and is acceptable for its intended purpose. In order to meet the needs of DHWM's inspectors, DHWM developed a Tier I Data Validation Manual.

DHWM's guidance contemplates a three-tiered process for examining analyses of volatile and semi-volatile organic compounds and inorganic elements in waste, soil and water matrices. The Tier I evaluation examines environmental data for technical holding times and common Quality Assurance/Quality Control (QA/QC) parameters such as laboratory blank and matrix spike results. Of particular interest in this tier are sections on how to examine data generated from hazardous waste characteristic tests, such as the Toxicity Characteristic Leaching Procedure (TCLP).

A Tier II evaluation, currently in development, will consist of examining additional QA/QC information beyond the Tier I evaluation. The Tier II evaluation will review calibration and laboratory control sample information. Tier III will be required on an as need basis and is primarily intended for litigation support. The activities in this tier will consist of expert witness testimony.

The DHWM guidance currently available for review consists of a manual and appendixes that cover

the first tier of the data validation process. A checklist is included in the appendixes that can aid a reviewer through the Tier I process. In the future, a Tier II checklist will be available for comment.

The guidance, *Tier I Data Validation Manual* is available by accessing DHWM's Web page at <http://www.epa.ohio.gov/dhwm>. Inquiries concerning the availability of the document should be made to Angela Scott-Owens at 614-644-2944. Comments may be submitted to the attention of Erik Hagen, Ohio EPA, DHWM, 122 South Front Street, Columbus, Ohio, 43216-1049.

*Ohio Hazardous Waste*

# Notifier

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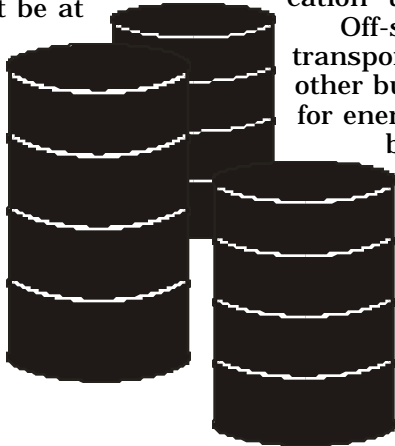
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## Are You Transporting Used Oil Off-Site to be Burned for Energy Recovery?

If your business generates and/or transports used oil off-site to be burned for energy recovery, you may be subject to the used oil regulations found in Ohio Administrative Code (OAC) Chapter 3745-279. How Ohio's used oil regulations apply to generators, transporters, and burners of used oil that is going to be burned for energy recovery depends on whether or not the used oil meets the specifications found in OAC rule 3745-279-11 (see <http://www.epa.state.oh.us/dhwm/dhwmrules/279-11.pdf>).

For used oil to be considered "on-specification" fuel, its constituent levels must be at or below (except for flash point) the following levels:

- 5 ppm or less of arsenic
- 2 ppm or less of cadmium
- 10 ppm or less of chromium
- 100 ppm or less of lead



- 100° F minimum flash point
- 4,000 ppm or less of total halogens
- less than 2 ppm PCBs.

Used oil that has been proven to meet these specifications and is burned for energy recovery is not subject to Ohio's used oil requirements. However, the person making the claim that the used oil meets the specifications must keep records of the analysis that the used oil meets the specification and a record of all shipments. Used oil which does not meet the specifications is called "off-specification" used oil.

Off-specification used oil transported off-site to another business that burns it for energy recovery must be burned in a boiler or an industrial furnace as described in OAC rule 3745-279-61 (see <http://www.epa.state.oh.us/dhwm/dhwmrules/27961.htm>). Off-specification used

oil transported off-site to another person's business cannot be burned for energy recovery in a space heater.

Therefore it is important for used oil generators that self-transport their used oil to be burned for energy recovery off-site to know the energy recovery device(s) used to burn the used oil. However, you can burn off-specification used oil that you generate or that is generated by household do-it-yourselfers in a space heater that you own, provided that the space heater has a capacity of less than 0.5 million BTU per hour and you vent it to the outside air. You can also burn used oil that you generate at other businesses you own.

Additionally, you can transport amounts of 55 gallons or less without complying with the used oil transporter requirements. But if you transport more than 55 gallons at a time, you must comply with the used oil transporter requirements in OAC rules 3745-279-40 through 3745-279-47 (see <http://www.epa.state.oh.us/dhwm/dhwmrules/index1.htm>).

continued on page 2...



## Used Oil continued from page 1

If your business transports used oil off-site to a used oil burner or a used oil processor/rerefiner, you are a used oil transporter. As a used oil transporter, you must obtain a U.S. EPA identification number from Ohio EPA, determine if the used oil is on- or off-specification, comply with all Department of Transportation requirements, manage all residues from transporting, and retain all records of shipments and deliveries. It is possible, however, to transport used oil and not be subject to these requirements if you are transporting used oil on-site, or if you are the generator of the used oil and are transporting less than 55 gallons of used oil to a collection center or aggregation point.

If you transport or have someone else transport a shipment of off-specification used oil directly to a used oil burner, you are a used oil fuel marketer. Used oil fuel marketers must obtain a U.S. EPA identification number from Ohio EPA, must only initiate shipments to a used oil burner that has a U.S. EPA identification number, must only send shipments to a used oil burner who burns the used oil in an industrial furnace or boiler, and must keep records of each shipment of used oil to that burner.

For additional information on Ohio's used oil regulations, please call (614) 644-2917 and ask to speak with someone in the regulatory and information services unit or visit our Web page to view our three used oil fact sheets at <http://www.epa.state.oh.us/dhwm>.



## Can Construction, Renovation or Demolition Debris be a Hazardous Waste?

**D**ebris generated from construction, renovation or demolition of buildings (with a few exceptions) that is destined for disposal is a waste as defined in Ohio's hazardous waste rules. Anyone who generates a waste must evaluate that waste to determine if it is a hazardous waste. If the debris is generated from remodeling or demolition of a household, it is exempt from regulation as a hazardous waste and may be disposed of in a construction and demolition debris (C&DD) landfill. In addition, wastes generated during the abatement of lead-based paint at households is exempt from regulation as a hazardous waste (please see our fact sheet on lead abatement wastes at <http://www.epa.state.oh.us/dhwm/pdf/LeadAbatementFactsheet.pdf>).

You must evaluate non-household waste generated from demolition, renovation or construction before disposal. Your evaluation may include any knowledge you have concerning the materials that were used in construction of the building and analyses of representative samples of the waste.

If you would like more information about waste evaluation please see the Summer 2002 "Ask the Inspector" article at <http://www.epa.state.oh.us/dhwm/pdf/Summer2002Notifier.pdf>.

If you would like to know more about representative sampling of construction, demolition and renovation waste please refer to the following Web sites:

- ASTM Standard E 1908-97: Standard Guide for Sample Selection of Debris Waste from

a Building Renovation or Lead Abatement Project for Toxicity Characteristic Leaching Procedure (TCLP) Testing for Leachable Lead (Pb) at <http://www.astm.org/>

- Evaluation strategies on the Washington State Department of Ecology Web site at [http://www.ecy.wa.gov/programs/hwtr/demodebris/pages2/sample\\_plans.html#Screen/](http://www.ecy.wa.gov/programs/hwtr/demodebris/pages2/sample_plans.html#Screen/)

Lead-based paint is the most common contaminant found in buildings that could cause waste to be defined as hazardous. Other components that may also be hazardous and should be removed prior to demolition are fluorescent lamps and thermostats that contain mercury, another hazardous constituent. We suggest that you consider having both of these components recycled. Older fluorescent light fixtures may contain ballasts that contain PCBs. Steel structural components, lead pipes and electrical components may also be recycled as scrap metal without regulation under the hazardous waste rules. When you recycle these items you are subject to fewer regulations.

We have also recently become aware that a polymer marketed as TARTAN® by the 3M company contains mercury that can potentially be hazardous waste because of its mercury content. This polymer was used in the 1970s and 1980s for gymnasium floors and tracks. If you are demolishing a school or recreation center, you should take care to evaluate any gymnasium floors that are present.

## Electronic Records

**I**n the past few years, many businesses have replaced paper record keeping with electronic record keeping. Recently, hazardous waste inspectors have been receiving some questions from waste handlers and facilities regarding electronic record keeping. Most questions have focused on the acceptability of storing compliance records electronically.

### Background

Currently, Ohio EPA accepts Generator Annual Reports, Facility Annual Reports and Annual Ground Water Monitoring Reports electronically in a prescribed format. Some handlers continue to track and document compliance-related activities on paper, others use a mix of both paper and electronic record keeping. Some treatment, storage and disposal (TSD) facilities are using bar-coding systems that allow our inspectors to determine the location and disposition of a specific container within a regulated unit as required by the operating record rule.

According to hazardous waste field inspectors, some of the electronically-maintained records include:

- **waste analysis records** (waste profiles, analytical laboratory reports for TSD facilities)
- **waste evaluation records** (analytical laboratory reports, material safety data sheets (MSDS) for waste handlers)
- **waste inventory records** (logs for tracking the duration of wastes being stored, barcoding systems for tracking wastes managed at a TSD facility)



- **personnel training records** (dates of required annual training and list of attendees)
- **inspection records** (inspection of regulated units and required emergency equipment)
- **waste shipment records** (manifests, land disposal restriction (LDR) notifications, tolling agreements)
- **customer information** (type of industry, facility contacts, billing invoices for TSD facilities)
- **ground water monitoring data** (quarterly and annual report information)

### Current Electronic Regulatory Initiatives

There are currently several regulatory initiatives addressing electronic record keeping that waste handlers, facilities and inspectors should keep updated on because they may impact how records are maintained in the future.

#### Uniform Electronic Transactions Act (UETA)

As of December 2002, 41 states have enacted UETA. UETA became effective in Ohio in 2000. The purpose of UETA is to provide for the regulation of electronic records and electronic signatures. It gives electronic signatures and records the same validity and enforceability as manual signatures and paper-based transactions if the requirements of the law are met.

The Ohio Department of Administrative Services (DAS) promulgated OAC rule 123:3-01-1 to



clarify the obligations of state agencies under the statute. The statute and rule together establish a security procedure which requires state agencies to report electronic transactions to DAS, conduct a security assessment of each set of proposed similar electronic transactions, use minimum technology standards and/or security procedures that are appropriate for the levels of security as determined by the security assessment, obtain DAS approval for its proposed procedures or seek a waiver, and establish and maintain documented security policies and procedures. UETA applies to many transactions between parties who agree to conduct their business electronically.

However, the rule applies only to electronic transactions involving a state agency which also: facilitate access to restricted information; purchase, sell or lease goods, services or construction; transfer funds; facilitate the submission of an electronic record or electronic signature required or accepted by a state agency; or create records upon which the state of Ohio or another person will reasonably rely including but not limited to formal communication, letters, notices, directives, policies, guidelines and any other record that is formally issued under a signature.

continued on page 4...

## 4.

### Electronic Records continued from page 1

#### **Cross-Media Electronic Reporting & Record Keeping Proposed Rule (CROMERR)**

This proposed rule would provide the legal framework for electronic reporting and record keeping under most of U.S. EPA's environmental regulations. The initial proposed rule comment period ended February 27, 2002. Under CROMERR, U.S. EPA will have to approve each state system for managing electronic reports, presenting each state with the potential of having to revise or even replace existing systems.

However, CROMERR will not create any new authority for U.S. EPA oversight of state programs. After analyzing initial comments on the proposed rule, U.S. EPA decided to separate the electronic reporting from the electronic record keeping. Currently, the states and U.S. EPA are focusing on developing guidance addressing the electronic reporting aspect.

After addressing the electronic reporting, they will move on to the electronic record keeping issues. May 2003 is the target date for promulgating the electronic reporting rule. Implementation guidance will be made available for review by state participants shortly after the final rule is published.

#### **Electronic Manifesting Proposed Rule**

On May 22, 2001, U.S. EPA proposed a rule giving waste handlers who are required to use the manifest form the option to complete, send, and store this information electronically. This rule also proposed changes to the manifest. U.S. EPA proposed these changes to reduce the paperwork burden related to the hazardous waste manifest provisions, and in response to many requests to streamline and update the hazardous waste tracking system. The public comment on this rule ended July 30, 2001.

Currently, the rule is being split into two parts. The first part, that addresses changes to the manifest is expected to be finalized in late 2003. The portion addressing electronic manifesting is undergoing more analysis and is expected to be finalized in late 2004 or early 2005.

It is important to note that once CROMERR is finalized, there may be discrepancies between UETA and CROMERR that will need to be resolved.

### **Commonly Asked Questions**

#### **1. Can a waste handler/TSD facility store compliance records electronically?**

Yes, this is an acceptable format to demonstrate compliance with OAC requirements. However the handler must be able to produce a hard copy of documents required to be kept upon the request of Ohio EPA, unless Ohio EPA has, prior to accepting the electronic record, had the transaction approved or waived by DAS.

#### **2. How should I handle enforcement and/or compliance e-mail correspondences?**

Submittals regarding compliance or enforcement must be made on paper, and any e-mail exchanged regarding enforcement or compliance or contracting matters must be followed by hard copy.

Paper copies are currently the most widely used format in which compliance-related information is supplied to our inspectors. Currently, file cabinets containing paper copies remain the primary data management system for the Agency.

When the public completes a file review, hard copies of all documents should be in the file for



review. It is anticipated that this will change over time with the implementation of Ohio EPA's electronic information management system.

While Ohio EPA cannot dictate to a facility the manner in which it stores its business records, the Agency cannot engage in certain electronic transactions without complying with the DAS approval or waiver procedure.

Any facility that requests "paperless" maintenance of its operating record, for example, needs to be informed that until Ohio EPA has obtained the appropriate DAS approval or waiver, the facility will still be required to submit a paper copy on request. Until the application of UETA and its rule are fully understood and implemented, our approach will continue to be to require submittals of paper copies in compliance or enforcement matters, and that any e-mail exchanged regarding enforcement, compliance or contracting matters be followed by hard copy.

DHWM will continue to monitor the development of various federal and state initiatives and the impacts they may have on our current information management systems, as well as those planned for the future. As new rules and procedures are adopted we will keep you updated. Please contact Jeff Mayhugh or Helen Miller at (614)644-2917 or your inspector with any questions.



## Generator Estimates Savings of \$472,000 by Implementing P2

**I**n 2000, the Division of Hazardous Waste Management (DHWM) and the Office of Pollution Prevention (OPP) conducted a Pollution Prevention (P2) Assessment at Mill's Pride, a manufacturer of hardwood kitchen cabinets located in Waverly, Ohio. The assessment focused on the company's coating application processes which generated large quantities of hazardous waste spent solvents and coatings, as well as spent rags and paint filters.

A recent followup call to the company revealed that several P2 projects were implemented in mid-2002 as a result of our assessment, and that the company will have realized a savings of approximately \$472,000 in the first year after making improvements. These are summarized below.

Ohio EPA identified five suggestions for improving efficiency on several of Mill's Pride's coating lines by decreasing over spray on cabinet parts that were being coated. Based on these suggestions, Mill's Pride chose to install new reciprocators on one of their coating lines.

The reciprocators are a component of the spray gun that has an electric eye which "reads" the edges of the boards, automatically shutting off the spray at the edge of the board. This decreases the amount of over spray that occurs on the coating line.

As a result, Mill's Pride has increased

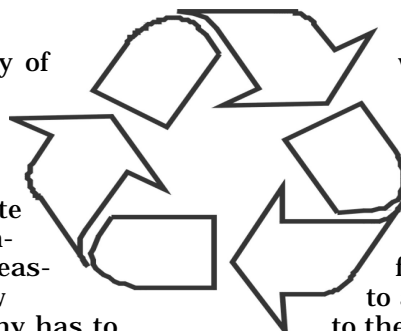
the transfer efficiency of their coating process by an estimated 35 percent, resulting in a similar reduction in the volume of waste generated by the company, as well as decreasing the volume of raw materials the company has to purchase for coating and cleanup.

Mill's Pride is now generating 33 fewer drums of hazardous waste solvents and coatings each month, for an estimated savings of \$27,720 per year in hazardous waste disposal costs. The purchase of 35 percent less stain, top coat, and sealer amount to a savings of \$432,000 per year. Total annual savings from waste disposal and raw materials as a result of installing new reciprocators is approximately \$460,000 per year.

The estimated environmental benefit of reducing coating losses is a 30 percent reduction in total annual volatile organic compound (VOC) emissions, or an annual reduction of 137 tons of VOCs.

Ohio EPA also suggested that Mill's Pride replace disposable filters used in two paint booths with reusable filters, and replace disposable rags used for cleanup with reusable rags.

Together, these two waste streams resulted in the generation and disposal of 14 drums of hazardous waste per month. The company found an industrial launderer



who recovers spent solvent from rags.

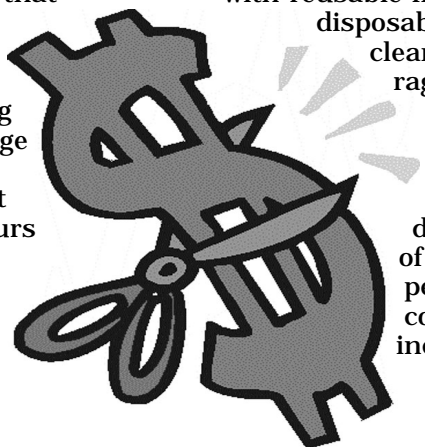
Mill's Pride also purchased plastic reusable filters for one manual paint booth although they found they were unable to apply reusable filters to the other booth due to

the moisture content of their coatings. As a result of these changes in rag and filter use, and the increased life of the disposable filters due to decreased over spray, the company now manifests only five drums of hazardous paint filters per month, and has estimated that it saves \$11,600 per year in purchase and disposal costs.

Mill's Pride continues to evaluate alternative cleaning solvents. Alternative solvents could increase environmental benefits by decreasing air emissions, as well as decrease operating and disposal costs.

Also, based on recommendations made in the P2 assessment report, Mill's Pride has formed a "continuous improvement" work team which meets once per week with the goal of looking at all production processes in order to reduce costs and waste. The team is actively working to identify further reductions in solvent losses, waste generation and other losses on the finish line.

Written by: Donna Goodman, DHWM-SEDO and Debbie Hannah, Mills Pride





## Ask the Inspector:

**Q. Will my facility be cited for potential violations if we have fire extinguishers but no water supply in our hazardous waste storage building?"**

Not necessarily. According to Ohio Administrative Code (OAC) rule 3745-65-31 (see <http://www.epa.state.oh.us/dhwm/dhwmrules/6531.htm>), all facilities must be maintained and operated in such a way to prevent releases of hazardous waste to the air, soil, or surface water which could threaten human health or the environment. OAC rule 3745-65-32 specifies required equipment including communication systems (alarms), phones or two-way radios, fire extinguishers, spill control equipment, and water spray systems unless none of the hazards posed by the hazardous waste handled at the facility require a particular kind of safety equipment (see <http://www.epa.state.oh.us/dhwm/dhwmrules/6532.htm>).

For instance, if your hazardous waste reacts violently with water, overhead water sprinklers would only worsen the situation. In this case, if fire extinguishers are to be used in lieu of water sprinklers but in conjunction with other equipment, the fire extinguishers must be compatible with the hazardous waste managed at your facility.



**Q. Does the registered, independent Professional Engineer (PE) who is required to certify such items as hazardous waste tank assessments and closure certifications need to be registered in Ohio?**

Yes, the engineer required to certify the construction, repair or operation of certain hazardous waste management units and the completion of closure must be registered with Ohio's Engineers and Surveyors Board. According to Ohio law, "no person shall practice or offer to practice the profession of engineering. . . unless such person has been registered. . . under this chapter. . .", (Ohio Revised Code (ORC) section 4733). Additionally, the definition of "professional engineer" provided in Ohio law includes the criteria that such a person be registered under ORC section 4733. It is important to note that the "practice of engineering" is a defined term under ORC 4733.01.

Furthermore, due to the passage of Ohio H.B. 337 (effective August 7, 2002), all public agencies in Ohio have the authority and responsibility to reject engineering plans not prepared by a PE. This provision of Ohio law can be found in ORC section 4733.23. For more information on PE requirements, please contact Ohio's Engineers and Surveyors Board (614-466-3651, [www.ohiopeps.org/](http://www.ohiopeps.org/)).

## FISHing FOR ANSWERS

**Q. How can I verify if a PE is registered to practice in Ohio?**

Ohio's Engineers and Surveyors Board maintains a list of registered engineers and surveyors. By contacting the state board at the number provided above or via the board's Web page, you can learn if a person is registered in Ohio as a PE.

# Motor Vehicle Salvage Yard Initiative

## Background

In July 2002, Central District Office's (CDO) Division of Hazardous Waste Management (DHWM), in cooperation with Ohio EPA's Small Business Assistance Office (SBAO) and the Ohio Auto and Truck Recyclers Association (OATRA), began a campaign to inspect and provide compliance assistance to owners and operators of vehicle salvage yards. Although facilities in this sector are rarely subject to hazardous waste inspections, they have significant potential for environmental harm if waste is poorly managed.

As a first step, SBAO tried to identify the universe of salvage yards, using resources such as the yellow pages on CD-ROM and DHWM inspection records. In addition, Ohio's Bureau of Motor Vehicles (BMV) provided a mailing list from their database of licensed vehicle salvage yards (771 statewide, 69 in the Central Ohio area.)

During the development of the initiative, DHWM and SBAO staff met with OATRA leadership and toured three salvage yards. Information gathered from the initial site visits was used to create an in-house training session to help familiarize the inspection staff with the auto recycling industry. As part of this training, DHWM coordinated information sessions with program staff from the divisions of solid and infectious waste management (DSIWM), air pollution control (DAPC), and surface water (DSW). These sessions provided the DHWM inspectors with some basic cross-training to identify potential compliance issues related to scrap tires, air and storm water management.

DHWM developed a special checklist to help the inspectors gather data on various aspects of environmental compliance, including management of automotive fluids, batteries, tires, and wastewater. In addition, SBAO developed and published a compliance guide, "Environmental Compliance Guide for Motor Vehicle Salvage Yards" (October, 2001). Before any inspections were conducted, the SBAO did a mass mailing of the compliance guidebook to salvage yards statewide.

Finally, Ohio EPA's Chris Cotton and SBAO's Laurie Stevenson and Kirk Nofzinger produced a video titled "Best Management Practices for the Auto Recycling Industry," which was funded by a grant from the Ohio Environmental Education Fund.



The video will be distributed directly to salvage yards statewide as another compliance tool.

It promotes simple, low-cost best management practices (BMPs) that can be used at salvage yards to achieve environmental compliance and stay profitable.

**Table 1: Salvage Yard Statistics**

Material	Initiative Results
<b>Used Oil</b>	60% had labeling violations; 12% had release violations and completed cleanup after the inspection; 48% do not remove and/or drain oil filters
<b>Fuel</b>	All facilities drained and reused fuel from vehicles
<b>Mercury Switches</b>	NO SALVAGE YARD COLLECTED MERCURY SWITCHES
<b>Tires</b>	52% resell or recycle all of their scrap tires; 20% resell some tires but shred the rest with the vehicles; 28% report shredding all incoming tires with the vehicles
<b>Batteries</b>	All facilities recycled batteries, however, there were some labeling/containment issues
<b>Storm water Permits</b>	Not enough information was collected to determine if sites had obtained requisite storm water permits

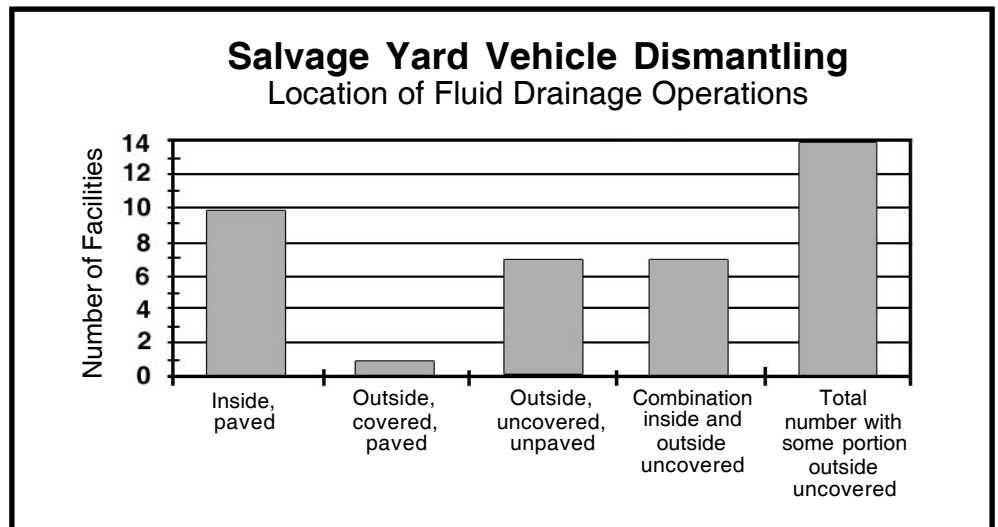
## Inspection Results

Inspectors targeted 40 out of the 69 licensed salvage facilities for inspection. To date, DHWM inspectors have visited 33 vehicle salvage yards. Of these, 25 received full compliance evaluation inspections. The other facilities were closed or not operating active salvage facilities. Table 1 on page 7 presents a summary of the findings of DHWM's inspections to date. Violations were found at 60 percent of the facilities inspected. The most common compliance issues included improper used oil container labeling and used oil releases to the environment.

SBAO's mailing of the guidebook appeared to have some benefit in increasing awareness of the regulations. A number of salvage yard owners mentioned receiving it prior to their inspection and some had already taken steps to improve their compliance based on information in the guidebook.

However, CDO estimates that many of central Ohio's salvage yards are not licensed through BMV. In addition, OATRA, which also provides environmental compliance information, represents only 20 percent of the industry, with approximately 120 members. It's anticipated that salvage yards which are not licensed or affiliated with OATRA receive little or no environmental compliance information. DHWM expects their incidence of non-compliance with environmental rules would be higher.

One of the goals of the initiative was to identify where vehicle dismantling was occurring (indoors versus outdoors) and to promote vehicle dismantling inside buildings through discussions during the inspection. Inspectors found that 40 percent of the sites visited were already working inside.



Over half (56 percent) of the facilities inspected by CDO, however, conducted at least some portion of their dismantling/fluid drainage process outside in an uncovered area. Additionally, at least seven of these sites were conducting such activities over unpaved areas. The graph above provides information regarding the location of dismantling operations at these facilities.

## Future Plans

Over the next several months, DHWM will be inspecting the remaining Central Ohio salvage yards. Inspectors will also be revisiting some salvage yards that were already inspected in an effort to determine the effectiveness and lasting impact of the initiative. DHWM hopes that in addition to correcting violations, many salvage yard owners have become more aware of the importance of environmental compliance and good fluid/waste management practices. As many are finding, compliance is not very costly and in reality it makes good business sense!

One of the challenges that still remains is getting compliance-related information to those facilities which are currently not licensed and/or not affiliated with OATRA. These facilities may ultimately be identified through Ohio EPA's complaint inspection process or discovered while inspectors are in the field. Once identified, our compliance resources can be made available to them.

Additional information about the initiative can be obtained from Lundy Adelsberger in DHWM/CDO at 614-728-3879. If you would like to receive copies of the compliance guide or video, contact SBAO at 614-728-8573 or 800-329-7518. OATRA's Columbus, Ohio phone number is 614-469-0677.

## DHWM's Data Validation Process

The Division of Hazardous Waste Management (DHWM) has developed a data validation process to help inspectors evaluate analytical data submitted by laboratories used by the regulated community as well as the DHWM contracted lab. While this guidance is mainly intended for DHWM's inspectors, you may find it valuable for your data collection activities. DHWM uses environmental data from a number of sources to support its decision-making processes. For example, DHWM often reviews waste evaluation data that will be used to make decisions on how to properly manage waste. Data generated by other activities that may require data validation include data from site closure activities and facilities undergoing corrective action.

Data validation may seem to require a great deal of chemistry knowledge. Actually, it is a process for reviewing data generated by a laboratory and accepting it, qualifying it or rejecting it on the basis of established criteria. The criteria used to assess data are based upon either Quality Control requirements defined by the laboratory or requirements defined by U.S. EPA. Data validation is therefore an important part of a Data Quality Objective process that is necessary to assure that data is generated and is acceptable for its intended purpose. In order to meet the needs of DHWM's inspectors, DHWM developed a Tier I Data Validation Manual.

DHWM's guidance contemplates a three-tiered process for examining analyses of volatile and semi-volatile organic compounds and inorganic elements in waste, soil and water matrices. The Tier I evaluation examines environmental data for technical holding times and common Quality Assurance/Quality Control (QA/QC) parameters such as laboratory blank and matrix spike results. Of particular interest in this tier are sections on how to examine data generated from hazardous waste characteristic tests, such as the Toxicity Characteristic Leaching Procedure (TCLP).

A Tier II evaluation, currently in development, will consist of examining additional QA/QC information beyond the Tier I evaluation. The Tier II evaluation will review calibration and laboratory control sample information. Tier III will be required on an as need basis and is primarily intended for litigation support. The activities in this tier will consist of expert witness testimony.

The DHWM guidance currently available for review consists of a manual and appendixes that cover

the first tier of the data validation process. A checklist is included in the appendixes that can aid a reviewer through the Tier I process. In the future, a Tier II checklist will be available for comment.

The guidance, *Tier I Data Validation Manual* is available by accessing DHWM's Web page at <http://www.epa.ohio.gov/dhwm>. Inquiries concerning the availability of the document should be made to Angela Scott-Owens at 614-644-2944. Comments may be submitted to the attention of Erik Hagen, Ohio EPA, DHWM, 122 South Front Street, Columbus, Ohio, 43216-1049.



*Ohio Hazardous Waste*

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## MOTOR VEHICLE SALVAGE DEALER CONTINUED

- [] If you will haul hazardous material, you must register with the **Alliance for Uniform Hazmat Transportation**. If you have questions, contact the PUCO.
- [] Depending on the type and size of the vehicle you drive, you may need to register with the **Public Utilities Commission of Ohio's (PUCO) Motor Carrier Division**. Contact the PUCO at **(800) 686-7826** or on-line at [www.puco.ohio.gov](http://www.puco.ohio.gov). ***\*Remember to check local government agencies.\****
- [] If you will haul oversized loads, you will need a special hauling permit from the **Ohio Department of Transportation (ODOT)**. Contact ODOT's main office at **(614) 466-7170** or your ODOT District Office for more information. Permit and fee information can also be found at <http://www.dot.state.oh.us>. ***\*Remember to check local government agencies.\****
- [] Every scrap iron, metal, and waste material dealer must keep accurate and complete records of everything the business buys or sells. The records should have the name and address of the customer, a description of the item, and the date and time of the transaction. For complete rules, please see **Ohio Revised Code (ORC) Section 1300.62**. The ORC can be found in your local library or on-line at <http://codes.ohio.gov/orc>.

**For more help, contact your local Small Business Development Center (SBDC).**

[www.ohiosbdc.ohio.gov](http://www.ohiosbdc.ohio.gov)

**\*REMEMBER TO CHECK LOCAL GOVERNMENT AGENCIES\***

**THIS CHECKLIST IS ABOUT STATE REQUIREMENTS.**

NAICS 56292/16



Small Business Assistance Office

# Environmental Compliance Guide for Motor Vehicle Salvage Yards

March 2003  
(Update)



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## Introduction

If you operate an auto salvage business, it is important for you to know the Ohio EPA regulations that apply to your activities. You may need permits for air pollution sources or wastewater discharges. You may also be required to notify Ohio EPA if you generate any hazardous waste.

Complying with some regulations, such as getting a permit, may take some time. So, the earlier you look into your responsibilities under the rules, the better.

This guidebook summarizes some of the major environmental requirements that could apply to your auto salvage business. It may not cover every requirement, and should not be used as your only source of information on the regulations. It provides you with a starting point to identify areas where your business might be subject to regulation.

If you need more information or have additional questions about the environmental regulations, contact the Small Business Assistance Office at (800) 329-7518. You can also contact your local Ohio EPA district office. See the map at the end of this guidebook to find the district office which covers your area.

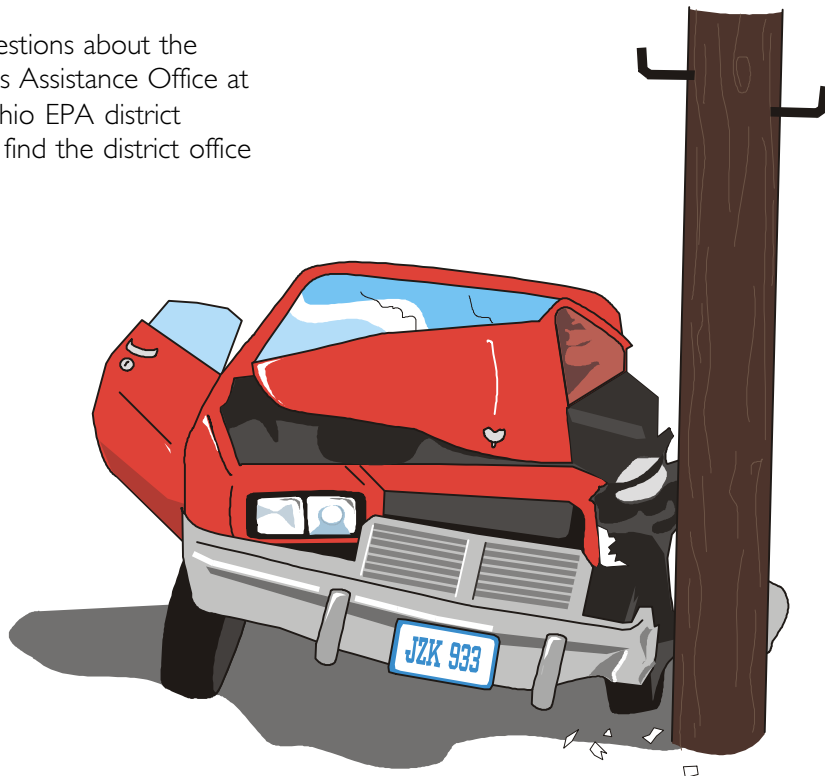
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**It is important that you are aware of and in compliance with the regulations to ensure that your company does not face environmental violations or penalties. Under Ohio's laws, a company can be fined up to \$10,000 per day for environmental violations!**

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## Air Pollution Requirements

Under Ohio's regulations, it is your responsibility to obtain all environmental permits that are needed for your business. Air pollution permits are required for "air contaminant sources." An air contaminant source is anything that emits air pollutants, such as particulates, dust, fumes, gases, mist, smoke, vapors or odors.

While this definition covers many different processes, there are four rules of thumb that can often help identify an air contaminant source. Does your business:

- Have something with a stack, dust collector or vent?  
Examples: shotblasters, grinders, storage tanks.
- Have a process that uses paints, solvents, adhesives or other chemicals?  
Examples: paint booths, degreasers, solvent cleaning tanks.
- Have a process that burns fuel (e.g., oil, natural gas, coal)?  
Examples: boilers, furnaces, process heaters.
- Have a process that produces visible dust, smoke or odors?  
Examples: unpaved roadways, material handling areas.

You may have activities at your salvage yard that are subject to Ohio EPA's air pollution control regulations. If your business involves collision repair or painting, a permit may be needed, especially for units such as spray booths. Paints and solvents are regulated because they often contain volatile organic compounds (VOCs) and hazardous air pollutants (HAPs).

In addition to painting, metal recovery activities (such as lead, aluminum or copper recovery) may also be regulated. For example, if you are using a sweat furnace to recover aluminum from scrap metal at your salvage yard, this unit must have an air pollution control permit and meet specific technical standards.



**Units such as car crushers can require an air permit from Ohio EPA.**



**Paints and solvents are regulated because they often contain volatile organic compounds (VOCs) and hazardous air pollutants (HAPs).**

There are two permits required for an air pollution source: the permit-to-install (PTI) and permit-to-operate (PTO). The permit-to-install is required before installing equipment. The permit-to-operate is needed to operate the equipment after installation.

Please note that if you are already operating your business and discover that you need an air permit, you must still complete and submit PTI and PTO applications. Most permits will require you to limit air pollutant emissions (e.g., pounds per day or pounds per hour of VOCs). The permit will often require that daily or monthly operating records be kept on site.

There are exemptions from permitting for small air pollution sources (called "de minimis sources"). Whether a unit is exempt depends on factors such as the size of the operation and the types of materials used in the process (e.g., low VOC coatings). In addition, the air regulations also include a list of specific units that are exempt from permitting.

Contact your local Ohio EPA district office, Division of Air Pollution Control or Small Business Assistance Program at (614) 644-4830 for more information on the air permitting requirements.

# Open Burning

Salvage yard owners need to be aware of Ohio EPA's open burning regulations, found in Chapter 3745-19 of the Ohio Administrative Code (OAC). "Open burning" is burning materials like trash, leaves, tree trimmings, tires and construction debris outdoors. When these materials are burned, they can release harmful air pollutants. Gases released by open burning can also corrode metal siding and damage paint on buildings.

Under Ohio's air pollution control regulations, a business cannot burn trash or any other waste for the purpose of waste disposal. A common violation Ohio EPA sees at small businesses is open burning wastes like pallets, trash or used shop rags.

A few types of open burning are allowed by businesses. In these situations, the business does not need to notify Ohio EPA or obtain permission from the Agency before burning. However, fires must be kept to a minimum size, cannot be used for waste disposal and the fuel burned must help minimize the emission of air contaminants. Examples of acceptable open burning include:

- heating tar;
- welding and acetylene torches;
- smudge pots and similar occupational needs; and
- heating for warmth of outdoor workers or strikers.

Ohio EPA can also authorize other open burning activities such as: fires for controlling diseases/pests, ceremonial fires, fire fighting training, managing land clearing wastes and emergency management of ignitable or explosive wastes. Before conducting any of these activities, the company must first contact Ohio EPA's Division of Air Pollution Control. Special conditions may apply to some activities. In addition, the business may be required to complete an application and obtain written approval from the Agency before open burning.

There may also be local laws in your area regarding open burning. These local ordinances may be more strict than Ohio EPA's regulations. Knowing the open burning regulations can help your company avoid violations or penalties.

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**"Open burning" is burning materials like trash, leaves, tree trimmings, tires and construction debris outdoors.**

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**Under Ohio's regulations, you CANNOT open burn waste at your salvage yard.**

If you have any questions about the open burning requirements, contact your local Ohio EPA district office, Division of Air Pollution Control.

## Freon Recovery

U.S. EPA regulates how freon is handled from motor vehicle air conditioners. Under these regulations, refrigerants must be removed from salvage vehicles before the vehicles are recycled. The rules also set standards for freon recovery and disposal.



## Technician Training

Technicians who recover freon from salvage vehicles must be trained and certified by a U.S. EPA-approved organization. Training must include instruction on the proper use of equipment, regulatory requirements, importance of refrigerant recovery and the effects of ozone depletion. To be certified, technicians must pass a test demonstrating their knowledge in these areas. A list of approved testing programs is available from the U.S. EPA ozone hotline and Web site.

## Approved Equipment

Technicians who service salvage vehicles must use U.S. EPA-approved equipment for refrigerant recovery and recycling. Recover/recycle equipment cleans the refrigerant so that contaminants like oil, air and moisture reach acceptably low levels. A list of approved recovery and recycling equipment is available from U.S. EPA's ozone hotline and Web site. Service shops performing recovery/recycle operations must certify to U.S. EPA that they own approved equipment.



**Make sure your freon recovery technicians are certified and properly trained. They must also use approved recovery equipment.**

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U.S. EPA's Ozone Protection Program  
Hotline: 800-296-1996  
Web site: [www.epa.gov/ozone/index.html](http://www.epa.gov/ozone/index.html)

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## Disposal/Recycling and Recordkeeping

Freon recovered from salvage vehicles should be sent off-site to a reclamation facility. Or, you can send it to a certified auto technician for recycling and reuse in another vehicle. For refrigerants sent to a reclamation facility, you must keep records, including the name and address of the reclaimer. If refrigerant is distributed or sold, you must keep invoices that indicate the purchaser, date of sale and quantity purchased.

## Prohibition on Venting Refrigerants

The Clean Air Act prohibits venting freon into the atmosphere.

For more information on the freon recovery requirements, contact U.S. EPA's Ozone Protection Program at (800) 296-1996.



### Scrap Tires

Ohio EPA has regulations in place for businesses that handle scrap tires. These regulations are found in Chapter 3745-27 of the Ohio Administrative Code (OAC). As a motor vehicle salvage business, you could be subject to these regulations if you generate, store or transport scrap tires. Tires that are removed from vehicles (both those on and off rims) are defined as scrap tires. A tire that is still on a vehicle is not defined as a scrap tire.

If you store scrap tires at your salvage yard, you may be required to register your business and get a storage license from Ohio EPA. Whether or not you need to register and get a license depends on factors such as the size of the storage area and whether tires are processed on-site or accepted from other businesses. There are fees associated with scrap tire registration and licensing.

Ohio's scrap tire regulations also outline the procedures that you must follow to ensure that scrap tires do not pose a health or fire hazard. For outdoor piles, these requirements include covering tire piles and having adequate mosquito control measures. All tires must also be stored safely to prevent fires, with adequate aisle space and protection from sources of ignition.

If you transport scrap tires, you may be subject to Ohio EPA's transporter requirements and may need to register as a scrap tire transporter. Whether you need to register depends on how many tires are transported in a load. (This does not include tires that are still on a salvage vehicle while the vehicle is being transported.) If you use someone else to transport your scrap tires off-site, you must use a hauler that is registered with Ohio EPA. The hauler must also comply with other requirements, including completing shipping papers and obtaining financial assurance.

Finally, you can dispose of or recycle scrap tires only at facilities that have been approved by Ohio EPA. Contact Ohio EPA's Division of Solid and Infectious Waste Management for more information on scrap tire requirements. In some areas, the local health department may be responsible for the scrap tire program. You can contact your local health department for information and assistance.

#### Keys for Good Scrap Tire Management

- \* Store scrap tires in a single area of no more than 2,500 sq. ft.
- \* Tire piles must be no higher than 8 feet.
- \* Keep tires protected from sources of ignition.
- \* Outdoor piles must be either covered or sprayed for mosquitos.
- \* Have tires removed periodically, so large piles do not accumulate.
- \* Use a registered scrap tire transporter.

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Tires that are removed from vehicles (both those on and off rims) are defined as scrap tires.

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**Outdoor tire piles can create a health and fire hazard.**



**Poorly managed scrap tires can create a breeding ground for disease-carrying mosquitos.**

## Used Oil

If you generate used oil from your salvage business, you are subject to Ohio's used oil regulations, found in Ohio Administrative Code (OAC) Chapter 3745-279. Some examples of used oil include engine oil, lubricating oil, brake fluid, transmission fluid and hydraulic fluid.

Many of the used oil regulations relate to good house-keeping practices. As a used oil generator, you must:

- label all storage containers or tanks with the words *used oil*;
- store used oil in containers or tanks that are in good condition (not rusting, leaking);
- if there is a leak of used oil: stop the leak, contain it, clean it up and properly manage the cleanup materials.
- use a transporter with an EPA identification number to ship used oil off site.

As a generator, you must ensure that used oil is properly managed by a recycling or disposal company. The best way to manage used oil is to send it off site to a recycling company. The regulations encourage different recycling options such as reconditioning, refining, reusing or burning for energy recovery.



### Handling Used Oil

**DON'T** throw your used oil on the ground, down the sewer, into a dry well, in a septic tank or down a floor drain.

**DON'T** put liquid used oil in the trash dumpster with your solid waste. Solid waste landfills can't take liquids.

**DON'T** mix your used oil with materials that might cause the whole mixture to become a hazardous waste, such as solvents or brake cleaner.

**DON'T** use used oil as a dust suppressant on your property.

**DO** inspect your used oil areas for leaks or spills and take quick action if clean-up is needed.

**DO** train employees on the correct methods for handling used oil.

**DO** look for ways to recycle used oil. If the used oil can't be recycled, it must be properly disposed of.



**Although these drums are labeled, they are stored in a poor location outside. DON'T do this at your salvage yard.**

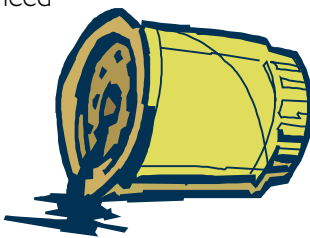
You should also be aware that under Ohio's used oil regulations, it is also illegal to use used oil as a dust suppressant on roadways, drives or on other areas of your property.

For more information on the used oil regulations, contact your local Ohio EPA district office, Division of Hazardous Waste Management (DHWM). See appendix for a list of commercial used oil recyclers in Ohio.

## Used Oil Filters

Under Ohio's used oil regulations, you do not need to handle used oil filters as hazardous waste if the filters are non terne-plated and have been properly drained of used oil.

Under Ohio's regulations, four different methods are acceptable for "hot-draining" used oil filters. Hot draining means that you remove and drain the filter at close to engine temperature. Note that any oil removed from the filter after draining must be properly managed under the used oil regulations. Acceptable hot-draining methods include:



### Gravity Draining

The filter is removed from the engine and placed gasket side down in a drain pan. If the filter has an anti-drain valve, the dome end of the filter is punctured so the oil can flow freely. The filter needs to drain for 12 (minimum) to 24 hours.

### Crushing

The filter is crushed by a mechanical, pneumatic, or hydraulic device to squeeze out the used oil. The remaining filter material is compacted.

### Disassembly

The filter is separated into its different parts using a mechanical device. Then, metal, rubber and paper can be recycled separately.

### Air Pressure

The filter is placed into a device where air pressure forces the used oil out of the filter.

Once you have drained the filters, you can send them to a recycling facility as scrap metal. This is the recommended option for handling filters.

If you are not recycling your drained filters and want to dispose of them instead, you must know whether the filters are terne-plated or not. Terne-plated filters, because of their lead content, may be regulated as a hazardous waste. Hazardous waste needs to be properly managed and must be sent to an Ohio EPA-permitted hazardous waste disposal facility. Filters that are not terne-plated can be disposed of with your other non-hazardous solid waste, but they must be drained first.

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**Terne is an alloy of lead and tin. The lead in terne plating can make a used oil filter hazardous. Terne-plated filters are used more commonly with heavy-duty vehicles such as buses and trucks.**

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If you are not going to drain your used oil filters, you must evaluate the filters to see if they are hazardous before disposal. You cannot throw any undrained filters into the trash dumpster unless you have evaluated the filters first and found them to be non-hazardous.

Also note that even if the filters are non-hazardous, a solid waste landfill will not accept them if they contain free liquids. Because of this, your best option for handling used oil filters is to drain them and send them to a recycling facility.

For more information on used oil filters, contact your local Ohio EPA district office, Division of Hazardous Waste Management (DHWM). See appendix for a list of used oil filter recyclers in Ohio.



**DON'T throw undrained oil filters into your trash dumpster.**

### Burning Used Oil in Space Heaters

During colder months, some auto service businesses help heat their shops by burning used oil in space heaters. It's important these businesses are aware of Ohio EPA's used oil and air pollution requirements. The used oil regulations state that used oil may be burned in space heaters if all of the following conditions are met:

- the space heater is only used to burn oil that is generated at the business or received from a do-it-yourself oil changer who generated it as a household waste;
- the space heater does not exceed a capacity of 500,000 (.5 million) British Thermal Units (BTUs) per hour; and
- combustion gases from the unit are vented to the outside.

It's also important to know that burning used oil in space heaters causes air pollution. The level of air pollution released depends on the amount of oil burned. Space heaters that have a burner rating of less than 500,000 BTUs per hour usually cause little air pollution and may qualify for the "de minimis exemption" under OAC Rule 3745-15-05.

Qualifying for the de minimis exemption means an air permit from Ohio EPA is not required to install or operate the space heater. If the space heater qualifies for this exemption, you need to keep monthly records of the amount burned. Records should note the origin of the waste oil (either generated on-site or received from a do-it-yourselfer). In addition, the results of any lab testing done on the oil should also be kept in your files.

The burner rating (BTU capacity) is usually found on the space heater or in the manufacturer's literature. Many space heaters on the market are rated less than 500,000 BTU per hour. If the heater rating is unknown, you can contact the manufacturer for this information.

Acceptable oils for burning include used crankcase oils from autos and trucks, lubricating oils, 90 W gear oil, automatic transmission fluid and hydraulic oil. Burning other types of waste oil may require approval from Ohio EPA's Division of Air Pollution Control (DAPC).

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**It's important to know that burning used oil in space heaters causes air pollution.**

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Contact the DAPC Small Business Assistance Program at (614) 644-4830 to get a copy of the de minimis exemption, or for additional information on the air pollution requirements for space heaters. For more information on the used oil rules, contact the Division of Hazardous Waste Management at (614) 644-2917 or your local Ohio EPA district office.



**This salvage yard uses a used oil space heater to heat its dismantling room. Commercially-manufactured units are safest and most efficient to operate.**



### Oil Spill Prevention

If you handle oil or oil products at your facility, you could be subject to the Spill Prevention Control and Countermeasure (SPCC) regulations. These regulations require that companies prevent and contain discharges of oil or petroleum products. If you have any of the following oil storage capacities, you are subject to the SPCC regulations:

- a total aboveground storage capacity of 1,320 gallons; or
- more than 42,000 gallons underground storage capacity. [This excludes tanks regulated by the State Fire Marshal's Office, Bureau of Underground Storage Tanks.]

In determining whether these regulations apply, you must consider the *capacity of your tanks or containers* and not the actual amount of oil stored. If you are storing oil in containers that are less than 55 gallons in size, you do not need to include these in calculating your SPCC storage capacity.

You should also be aware that, under these regulations, the definition of oil is very broad and includes animal, vegetable and soluble oils. Other common oil and petroleum products that are regulated include heating oil, crude oil, mineral oil, gasoline and diesel fuel.

If you are subject to the SPCC, rules you must provide secondary containment for oil or petroleum product storage units to contain any releases. You must also prepare a written SPCC plan.



**Secondary containment around oil tanks and containers helps to prevent leaks and spills and can help you avoid a costly cleanup.**

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**Under the SPCC rules, the definition of oil is very broad and includes animal, vegetable and soluble oils. Other common oil and petroleum products that are regulated include heating oil, crude oil, mineral oil, gasoline and diesel fuel.**

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**The regulations apply to the storage of used oil and oil products.**

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Secondary containment must be sufficient to contain precipitation and the volume of the largest tank or container in each storage area. To meet these criteria, containment systems are typically designed to hold 110 percent of the volume of the largest tank or container in the area.

You must also have a written SPCC plan which describes all measures taken at your facility to prevent and control a release of oil or petroleum products. The SPCC plan must be prepared and implemented before you begin to store oil and it must be updated every five years, or whenever significant changes in oil storage occur. You must also train employees who handle oil on the contents of the plan.

The SPCC plan must be signed by your management and certified by a professional engineer. Your management must review and sign the plan every three years, even when there are no changes. The SPCC plan must be kept on-site and be available for review.

Contact your local Ohio EPA district office, Division of Emergency and Remedial Response for more information on the SPCC requirements.

# Antifreeze

Antifreeze drained from an auto, truck or other engine is considered a waste. Ohio EPA does not regulate used antifreeze as hazardous waste unless it contains high enough levels of certain metals, such as lead, cadmium or chromium. It can also be a hazardous waste if it has been mixed with other wastes such as solvents or if it has a high pH. If you generate antifreeze, you must evaluate it to determine if it is a hazardous waste. You must also properly manage and dispose of spent antifreeze.



You CANNOT dispose of used antifreeze by pouring it into your septic system, on the ground, or in the trash. In most areas of Ohio, you also cannot dispose of antifreeze in the sanitary sewer. You can hire a disposal company to dispose of your used antifreeze, but this will usually be the most expensive option.

The best option for handling used antifreeze is to have it recycled. There are three ways you can recycle used antifreeze. You can purchase a small antifreeze recycling system to use at your facility. You can hire a mobile recycling company to come to your business, recycle the antifreeze and leave the recycled product for you to reuse. Or, you can hire a company to pick up your used antifreeze and recycle it at a central facility. If you recycle your own antifreeze on-site, you must make sure that any wastes from recycling (e.g., sludges, filters) are evaluated before disposal to see if they are hazardous.

If your used antifreeze is a hazardous waste and you do not have it recycled, you must dispose of it at an Ohio EPA-permitted hazardous waste disposal facility. If you have any residue from recycling antifreeze that is a hazardous waste, this must also be sent to a permitted disposal facility.

Prior to sending it off-site for recycling or disposal, the used antifreeze must be managed properly on-site as a hazardous waste (e.g., keeping closed containers, labeling, inspections, etc.).

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Antifreeze is not regulated as a hazardous waste unless it has a high concentration of metals such as lead or it has a high pH. This may happen if you are removing antifreeze from older vehicles.

It's also important that you don't mix antifreeze with other wastes such as solvents or gasoline. This can cause your antifreeze to be regulated as a hazardous waste.

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If you have additional questions about antifreeze, contact your local Ohio EPA district office, Division of Hazardous Waste Management (DHWMM). See appendix for a list of antifreeze recycling services.

### Handling Used Antifreeze

**DON'T** mix solvents, degreasers or waste fuel with used antifreeze. This can cause your antifreeze to become a hazardous waste.

**DON'T** dispose of used antifreeze by pouring it into your septic system, into a dry well, on the ground, or in the trash.

**DO** store used antifreeze in a dedicated container.

**DO** train employees on the proper way to handle antifreeze.

**DO** consider either on-site or off-site recycling.

### Hazardous Waste

Under Ohio EPA's regulations, all wastes generated from a business must be evaluated to see if they are hazardous or not. If your company generates a hazardous waste, you are required to manage and dispose of that waste according to Ohio's hazardous waste regulations.

If your company generates more than 100 kilograms (220 pounds) of hazardous waste in any month, you must obtain a generator identification number from Ohio EPA. A permit is not required to generate hazardous waste. A permit is only needed in Ohio if a company wants to treat, store or dispose of hazardous waste. All hazardous waste must be sent to a permitted hazardous waste facility for treatment or disposal.

If you have a material that can no longer be used, it is considered a waste. There are two ways in which your waste can be classified as a hazardous waste:

#### Listed hazardous wastes

If your waste appears on any one of the lists published in Ohio's hazardous waste regulations, it is a hazardous waste. These hazardous waste lists are in the Ohio Administrative Code (OAC), rules 3745-51-31 through 3745-51-33.

#### Characteristic hazardous wastes

If you find that your waste does not appear on any of the lists in Ohio EPA's regulations, your waste may still be regulated if it possesses a hazardous characteristic. Under the regulations there are four characteristics that make a waste hazardous: ignitability, corrosivity, reactivity and toxicity. These characteristics are defined in OAC rule 3745-51-21 through 3745-51-24.

#### Hazardous wastes generated by auto salvage yards may include:

- spent solvents
- solvent contaminated wipers/shop towels
- waste paints
- spent fluorescent bulbs (containing mercury)
- used antifreeze contaminated with metals, solvents or fuels
- used oil contaminated with metals, solvents or fuels
- contaminated gasoline
- lead acid batteries



**Drums of hazardous waste need to be stored to prevent leaks and spills. Leaking drums, especially in outdoor areas could lead to a costly cleanup!**

Many small businesses are hazardous waste generators. Even if you generate only a small amount of waste, the waste must still be evaluated and, if it is hazardous, properly managed. To determine if you have a hazardous waste, you must know about ALL the wastes that come from your business. Go through your business and make a list of all your wastes (include even those that you think are not hazardous). Go through the list and carefully evaluate each waste stream.

Keep any information that you use to make your waste evaluation in your files. If you do not have enough information from the process to evaluate a waste, you may need to have the waste sampled and sent to an environmental testing lab for analysis. Keep any lab results you have on your waste in your files.

If you would like more information about the hazardous waste regulations, contact your local Ohio EPA district office, Division of Hazardous Waste Management (DHWM) or DHWM's Compliance Assurance Section at (614) 644-2917.

# Solvent Contaminated Wipers

Many small businesses use solvents and wipers to clean equipment. When disposed of, the solvents used for cleaning often meet the definition of a listed or characteristic hazardous waste under Ohio's regulations. Solvent wipers include both disposable and reusable rags and towels. After use, these wipers are contaminated with solvents.

If you generate solvent wipers, these wipers must be evaluated to see whether they are hazardous or not BEFORE you dispose of them. Under Ohio's regulations, you cannot throw solvent wipers in the trash unless you have information showing the wipers are not hazardous. And, in many cases, solvent wipers are hazardous, even if they seem dry when you dispose of them. There are two ways in which solvent contaminated wipers can be handled. They can either be disposed of or sent off-site to a commercial laundry for recycling.

Any company that sends contaminated wipers for disposal must evaluate those wipers to determine whether they are hazardous before they are disposed of. This includes determining whether the wipers are listed or characteristic hazardous wastes. If you have wipers that are hazardous and you want to dispose of them, you must send them to a permitted hazardous waste disposal facility.

A better option to manage solvent wipers is to send them off-site to a commercial laundry for cleaning. Under this scenario, Ohio EPA has determined solvent wipers that will be cleaned and reused are not subject to the hazardous waste regulations because they are not being discarded. All solvent wipers are eligible for this exclusion if the wipers contain no free liquids and are sent to a commercial laundry that is subject to regulation under the Clean Water Act or a dry cleaner.



**DON'T throw solvent wipers into your trash dumpster unless you know they are not hazardous.**

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**Solvent wipers include both disposable and reusable rags and towels.**

**Make sure you know whether these are hazardous or not BEFORE you dispose of them.**

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## Evaporating Solvent Wipers

Many small business owners ask whether it is acceptable to dry out solvent wipers by leaving drum lids off or evaporating off solvents. Under Ohio's hazardous waste regulations, you CANNOT evaporate solvent contaminated wipers. In many cases, this is considered hazardous waste treatment and is not acceptable without a hazardous waste treatment permit. In addition, evaporating wipers can release air pollutants, a possible violation of Ohio's air pollution control requirements. When collecting wipers, you need to ensure that they are kept in containers that are in good condition. The containers must be kept closed, except when adding or removing wastes.

## Burning Solvent Wipers

It is important to know that Ohio's waste and air pollution control regulations also prohibit the burning of solvent contaminated wipers. Therefore, you CANNOT burn wipers (or other wastes from your business) in burn barrels or trash piles.

If you would like more information about solvent contaminated wipers, contact your local Ohio EPA district office, Division of Hazardous Waste Management (DHWM) or DHWM's Compliance Assurance Section at (614) 644-2917.



### Lead Acid Batteries

If you remove lead acid batteries from salvage vehicles, you need to be aware of Ohio's hazardous waste regulations that apply to this activity. If lead acid batteries are handled improperly, they can pose environmental and health hazards. Battery components are toxic and corrosive. Lead and sulfuric acid can contaminate the air, soil and water.

Companies that generate spent lead acid batteries are encouraged to send them to a recycling facility. Through recycling, both the lead and sulfuric acid can be recovered from batteries. Lead acid batteries are commonly used in cars, trucks, tractors, boats, motorcycles and other vehicles.

If you are removing lead acid batteries from vehicles and sending them to a recycling facility, they are not subject to the full scope of Ohio's hazardous waste rules. For batteries that will be recycled, you can manage them under Ohio's existing lead acid battery rule in OAC 3745-58-70. Or, you can manage them under Ohio's hazardous waste regulations as a "universal waste." The universal waste regulations are found in OAC Chapter 3745-273. Both regulations have reduced standards for batteries that will be recycled.

If you are not recycling lead acid batteries, you must evaluate them before they are disposed of to determine if they are hazardous. Because of the lead and acid contained in these batteries, they will likely be a characteristic hazardous waste. And, if not recycled, these must be sent to a permitted hazardous waste disposal facility. You should also be aware that if you are reclaiming batteries yourself on-site by opening batteries and removing acid and/or lead, you are subject to additional hazardous waste regulations. There may also be surface water and air pollution regulations that apply to these activities.



**This company has an indoor battery storage area which is well ventilated. An impervious floor helps contain spills and leaks.**

#### Tips for Handling Lead Acid Batteries

- Do not open, handle or store batteries in a way that could rupture the battery case or cause it to leak.
- Separate batteries from other wastes like paper, rags, garbage and flammable or hazardous chemicals.
- Consider using a dike or other form of secondary containment to help prevent spills, reactions or fires. If storing batteries outside, protect them from the elements and consider placing them on an impervious surface to prevent discharges.
- Monitor your battery storage area for leaks or deterioration. Take quick action to address any spills or leaks.
- Make sure employees know how to safely handle batteries.
- Don't reclaim battery components yourself, unless you are sure that you are in compliance with the hazardous waste regulations that apply to this activity.

If you would like more information about handling lead acid batteries, contact your local Ohio EPA district office, Division of Hazardous Waste Management (DHWM) or DHWM's Compliance Assurance Section at (614) 644-2917.

### Wastewater Discharges

An auto salvage business may generate process wastewater from equipment cleaning, car washing, paint spray booths or other sources. Under Ohio EPA's regulations, options for handling process wastewater include direct and indirect discharges.

#### Industrial Wastewater: Direct Discharges

Any discharge of industrial wastewater to "waters of the state" will require a discharge permit (NPDES permit) from Ohio EPA's Division of Surface Water. Examples of waters of the state include: streams, rivers, lakes, ponds, marshes, watercourses, waterways, wells and springs. Wastewater discharges entering a conveyance system (like a ditch or storm sewer) that leads to a waterway may also require an NPDES permit.

You may also be required to treat wastewater to remove harmful contaminants (e.g., metals, chemicals, oils or grease) before it is discharged. If treatment is required, a separate permit is needed to construct wastewater treatment units, called a permit-to-install (or PTI). The PTI application is reviewed by Ohio EPA's Division of Surface Water.

#### Industrial Wastewater: Indirect Discharges

Often, the local wastewater treatment plants (POTWs) are responsible for regulating the companies that discharge wastewater to them. A large POTW may be able to handle the wastewater from your business. However, even large wastewater treatment plants are not generally designed to handle industrial wastes like chemicals, metals, oils, etc. They are designed to handle sewage related wastes and wastewater. Because of this, the treatment plant may require you to conduct "pretreatment" (e.g., remove of metals, oil or grease, etc.) before discharging your wastewater to them.

If you want to discharge industrial wastewater to a local POTW, you need to discuss these activities with the treatment plant directly. Permission to discharge to the POTW and/or obtaining a permit may be necessary. If you are required to construct wastewater treatment or storage units, this activity requires a permit to install (or PTI) from Ohio EPA.



**If you discharge wastewater to waters of the state, you MUST have an NPDES permit for this activity.**

**\*\*\* NOTE \*\*\***

Ohio EPA's regulations prohibit the discharge of process wastewater into injection wells without a permit. Examples of injection wells include dry wells, drain fields and cesspools. In addition a septic tank, mound system or leaching line is defined as an injection well system.

Contact the Division of Surface Water at your local Ohio EPA district office for more information on the wastewater discharge and permitting requirements.

### Floor Drains

Floor drains are found at many small businesses. A common floor drain system can include a concrete trench which runs down the center of a shop floor. The trench is designed to capture water, cleaners, oil, dirt or other materials. Some shops have small rectangular or round floor drains connected to underground piping.

Some floor drains are necessary for day-to-day operations. Others are used for emergency purposes only. And, some floor drains don't seem to have any apparent use. *Do you know where the floor drains in your business go? Are you discharging wastewater or other fluids into your floor drains?*

It is very important that you know where all your floor drains lead, and are aware of Ohio EPA's regulations that apply to your discharge activities. If you do not know where your drains lead, or if you are using floor drains improperly, you could be contaminating nearby surface waters or drinking waters.

Some floor drains lead into a sanitary sewer, where wastewater goes directly to a public wastewater treatment plant (POTW). Other floor drains lead to an on-site sewage treatment system like a septic tank. Sometimes floor drains lead directly to an underground holding tank or discharge to a waterway or to the ground outside. Ohio EPA's water pollution control regulations apply to all of these activities.

Any company that wants to discharge an industrial wastewater to waters of the state needs to get a permit (NPDES permit) from Ohio EPA. Examples of waters of the state include streams, rivers, lakes, ponds, marshes, waterways, wells and springs. If your floor drains lead to any water of the state, you must have a discharge permit for this activity.

Companies that discharge industrial wastewater directly to a POTW are also regulated. Often, the POTW regulates the discharge activities. If you are discharging to a POTW, you need to contact them and discuss your activities with them. You may be required to obtain a permit for the discharge. In addition, you may be required to treat the wastewater before discharging (e.g., oil/water separation, removing solids, chemicals, etc.).

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A common floor drain system can include a concrete trench which runs down the center of a shop floor.

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**Make sure you know where your floor drains go. Make sure floor drains DO NOT discharge outside onto the ground or into an injection well system such as a septic tank or dry well.**

**\*\*\* NOTE \*\*\***

It is illegal to discharge process wastewater outside your business onto the ground! Make sure your floor drains don't lead outside where wastewater could end up on the ground.

### Discharges to Injection Well Systems

If you have a floor drain which leads to an injection well, you are subject to Ohio's underground injection control (UIC) regulations. The UIC regulations are in place to protect underground drinking water sources from becoming contaminated. If you are discharging industrial wastewater to a floor drain that leads to a septic system or other injection well system, you could be in violation of Ohio's water pollution control laws. Examples of injection wells include dry wells, drain fields and cesspools. In addition, a floor drain that is tied to a septic tank, mound system or leaching lines is defined as an injection well system.

Under Ohio EPA's water pollution control regulations, a company CANNOT discharge industrial wastewater into an injection well. This activity is strictly prohibited unless a company has obtained a permit to drill and a permit to operate (UIC permit) from Ohio EPA's Division of Drinking and Ground Waters. This includes discharging industrial wastewater to an on-site sewage treatment system (e.g., septic tank, leach field). Not only would this activity be a violation without a permit, the discharged materials (chemicals, solids, oil, etc.) could also damage your on-site system.

The use of some types of disposal wells has been completely banned, including the use of motor vehicle waste disposal wells.

### Important Points to Remember

- Check all your floor drains and make sure you know where they drain to.
- If you are using floor drains to discharge industrial wastewater into a septic system or onto the ground, you need to stop these discharge activities immediately. You must find another way to manage your wastewater.
- If you are using floor drains to discharge industrial wastewater to a water of the state, and you do not have an NPDES permit, you must stop these discharge activities immediately. You must either obtain a permit or find another way to manage wastewater.
- If you are using floor drains to discharge wastewater to a local wastewater treatment plant, make sure the treatment plant knows about this activity. You may be required to conduct treatment on the wastewater before discharging it. You may also need to get a permit for the discharge.

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**Some types of disposal wells have been banned, including the use of motor vehicle waste disposal wells.**

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- DO NOT put other fluids like oil, solvents, paints or chemicals into a floor drain. This could contaminate your property and lead to large fines and cleanup costs.
- Think about installing an emergency shut-off on the drain pipes to prevent accidental spills from entering the sewer.
- If you have floor drains at your company that you are not using, think about having them capped or plugged. Good housekeeping and planning can help avoid costly problems later.

If you have any questions about floor drains and Ohio's water pollution control requirements, contact your local Ohio EPA district office, Division of Surface Water (DSW) for assistance.

You can contact Ohio EPA's Division of Drinking and Ground Water, UIC Program at (614) 644-2752 for more information about injection wells.



### Storm Water

Many businesses have outside processes, storage units and/or material handling areas. Auto salvage yards typically have outdoor areas where salvage operations are conducted or materials are stored. Storm water contacting these outdoor areas can carry pollutants such as heavy metals, oils and solvents directly to a stream, ditch, lake or other surface water. In 1987 the Clean Water Act was amended to include requirements for controlling storm water discharges at industrial sites. Even a small business may be subject to Ohio EPA's storm water regulations.

Businesses that have certain Standard Industrial Classification (SIC) codes are subject to the storm water regulations. Recycling facilities including scrap yards, battery reclaimers and salvage yards are included on this list of regulated facilities.

Under the storm water regulations, businesses are required to obtain a permit and develop a Storm Water Pollution Prevention Plan (SWPPP). The permit is called a National Pollution Discharge Elimination System (NPDES) permit and is issued through Ohio EPA's Division of Surface Water. Storm water permits usually include record keeping, spill reporting and monitoring requirements.



**This salvage yard stores vehicles on a concrete surface until the fluids are removed.**



**At this salvage yard, vehicles undergo fluid removal in an indoor area. The impervious floor helps contain any spills.**

In the SWPPP, you must identify potential activities at your business that may contaminate storm water. In addition, the plan must outline the practices that you will use to help prevent storm water from becoming contaminated and running off into surface waters.

Some of the best management practices to help reduce the possibility of pollution at your auto salvage yard may include:

- Removing all fluids from vehicles prior to storage onsite;
- Liberal use of drip pans in areas where fluids are collected and stored;
- Storing materials indoors or, if outdoors, under tarps or other covers;
- Proper spill protection around car-crusher equipment;
- Keeping disposal or recycling records for automotive fluids (oil, transmission fluid, antifreeze, etc.);
- Making sure that no fluids are disposed of onto the ground, into storm drains, or into septic systems or waterways; and
- Using spill containment devices and absorbent materials to prevent releases.

Some businesses can be exempt from the permitting requirements if they operate or make process changes to prevent storm water contamination (e.g., moving activities under a roof). Questions about this "no exposure" exemption from the permitting process can be discussed with Ohio EPA's Division of Surface Water.

For additional information on the storm water requirements, please contact your local Ohio EPA district office, Division of Surface Water.

# Underground Storage Tanks

It is estimated that there have been about 1.1 million underground storage tanks (USTs) buried at over 400,000 sites nationwide. And, until the mid-1980s, most USTs were made of bare steel, which is likely to corrode and allow UST contents to leak into the environment over time.

Faulty installation or inadequate operation/maintenance can also cause USTs to leak. Potential hazards from leaking USTs include soil and groundwater contamination, fire and explosion. For these reasons, U.S. EPA established the UST regulations in the mid-1980s.

Companies in Ohio that have USTs for storage of petroleum or hazardous substances are regulated by the Division of State Fire Marshal, Bureau of Underground Storage Tanks (BUSTR). A UST is a tank and any underground piping connected to the tank that has at least 10 percent of its combined volume underground. The UST regulations apply only to underground tanks and piping that store either petroleum or certain hazardous substances.

If you are using an underground tank for storage of petroleum or hazardous substances, you could be subject to these regulations. Some tanks are exempt from the regulations, including certain farm/residential units, small tanks (storing 110 gallons or less) and some process-related tanks. Specific information on these exemptions is included in Ohio's UST rules.

A company subject to the UST rules must ensure that underground tanks meet certain technical specifications. The technical regulations for USTs are designed to reduce the chance of releases. To meet the requirements, owners were required to upgrade, replace or close existing UST systems by 1998. Tanks remaining in operation and any newly installed tanks are now required to have leak detection systems. UST owners and operators are responsible for reporting and cleaning up any releases.

UST systems must be registered with the State Fire Marshal's Office. Financial assurance is also required for UST operators to ensure that adequate funds are set aside to cover the costs associated with a leak or cleanup.



In addition, a certified tank installer must oversee any installation, removal or repair of an underground tank. A permit from BUSTR is also required for any installation, upgrade, major repair or closure of an underground tank. There are also closure guidelines for tanks that are taken out of service, removed or closed.

For more information about the UST requirements, contact the Department of Commerce, State Fire Marshal's Office, Bureau of Underground Storage Tank Regulation (BUSTR) at (614) 752-7938.

## Mercury Switches

Mercury is a highly toxic metal and is often found in vehicle hood and trunk light switches. During crushing or shredding, mercury can be released into the environment, polluting water and soil. Mercury can also be released to the air when steel mills melt metal from scrapped autos. Although the amount of mercury in each switch is relatively small (about one gram), the potential amount of mercury released into Ohio's environment annually from auto recycling can total thousands of pounds.

There are no current mandatory Ohio EPA requirements to remove mercury switches at all auto recycling facilities. However, some auto shredders may be required to remove switches under the terms and conditions of their air pollution control permits. And, because of the growing concern over mercury and its toxicity, other auto recycling facilities may also be required to remove switches in the future.

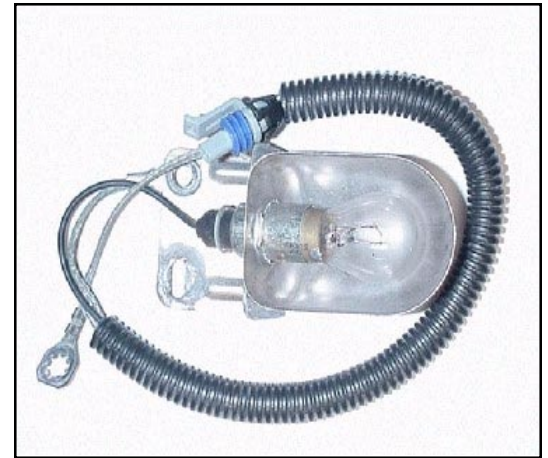
By removing switches at your salvage yard, you play an important role in keeping mercury out of the environment. Mercury switch removal is not difficult nor expensive to do.

## Vehicles Containing Mercury Switches

Mercury is found in a small glass or metal capsule within hood and trunk light switches. These types of switches were commonly used in vehicles manufactured in the 1970s and 1980s. Some late model cars still use them, although the use of mercury is being phased out by many car manufacturers.

A list of vehicles that are known to contain mercury switches can be found on U.S. EPA Region V's Web site at [www.epa.gov/Region5/air/mercury/autoswitch.htm#remove](http://www.epa.gov/Region5/air/mercury/autoswitch.htm#remove).

The actual mercury switch is the small, bullet-shaped metal or glass capsule that forms the base of the light socket and is visible once the bulb is removed. Sometimes the mercury switch will be found not at the light fixture, but further along the wire that runs toward the bottom of the hood or trunk.



Mercury switches like the one in this light fixture are found in auto hoods and trunks. Mercury switches help conduct electricity to trunk and hood lights.



Mercury is contained in a small capsule in the switch.

### \*\*\* IMPORTANT \*\*\*

When removing switches, work very carefully to ensure that the capsule containing the liquid mercury does not break open. If you do have a spill or release, immediately contact Ohio EPA's Division of Emergency and Remedial Response at (800) 282-9378 for guidance on containing and cleaning up the release.

### Removing Switches

Mercury switches should be removed before the vehicle is crushed. It only takes a few seconds to remove the hood and trunk lighting fixture and this can be done during the dismantling process.

The basics for removal include (1) cutting the power supply wire attached to the base of the light fixture and (2) removing any fasteners in order to separate the entire fixture from the vehicle.

A number of car manufacturers have published easy-to-understand fact sheets that outline the procedures for switch removal, including Ford, GM and Chrysler. You can find these at procedures at [www.epa.gov/Region5/air/mercury/autoswitch.htm#remove](http://www.epa.gov/Region5/air/mercury/autoswitch.htm#remove).

### Storing Switches After Removal

Properly storing switches after removal is very important, not only for the protection of the environment, but for the protection of your employees. For basic storage, remember the following:

- Collect mercury switches in a well-sealed, leak-proof, heavy, plastic container. Because of the weight of mercury, it is recommended that switches be collected in 5-gallon plastic containers, not in large drums.
- Clearly mark your storage container so employees know what's in it and can take precautions to prevent exposure or damage to the container. You may want to label the container "Waste Mercury Switches."
- Store the mercury switch container in a safe area, away from heavy traffic and in an area where there is little risk of fire
- Do not use tin or aluminum containers because mercury may combine with these metals and leak through seams.
- NEVER break open mercury switches and try to remove the liquid mercury yourself! Leave this to a professional company specializing in mercury recycling.

#### \*\*\* IMPORTANT \*\*\*

Once switches are removed, NEVER dispose of them with regular solid waste in your trash dumpster. If switches are not sent to a recycling company, then they must be sent to a hazardous waste disposal company.

### Recycling Switches

There are several companies that can recycle the mercury found in switches and other devices. A list of mercury recyclers is available from Ohio EPA's Office of Pollution Prevention (OPP) by calling (614) 644-3469. Or, you can find a list of recyclers on OPP's Web site at [www.epa.state.oh.us/opp/recyc/mercrec.html](http://www.epa.state.oh.us/opp/recyc/mercrec.html).

The Ohio Mercury Reduction Group may also be a helpful resource for you. The group is a partnership of various state agencies and educational institutions, working to reduce mercury use and emissions in the state. One of the many activities of the group has been to assist in arranging for transportation and recycling of mercury waste. For help, contact Bowling Green State University at (419) 372-2173. Or, visit the Web site for Ohio's Elemental Mercury Collection and Reclamation Program at [www.bgsu.edu/offices/envhs/environmental\\_health/mercury/program.htm](http://www.bgsu.edu/offices/envhs/environmental_health/mercury/program.htm).

You do not need to pay a lot of money to recycle your mercury switches and, by doing so, you help play an important role in keeping Ohio's environment clean!

### Resources

Office of Pollution Prevention  
Ohio Environmental Protection Agency  
P.O. Box 1049  
Columbus, Ohio 43216-1049  
E-Mail [p2mail@epa.state.oh.us](mailto:p2mail@epa.state.oh.us)  
Phone (614) 644-3469  
Fax (614) 644-2807

Ohio Elemental Mercury Collection Program  
Environmental Health and Safety  
102 College Park Office Building  
Bowling Green State University  
Bowling Green, OH 43403  
Phone (419) 372-2171  
Fax (419) 372-2194



## GLOSSARY OF ENVIRONMENTAL TERMS

**Air Pollutant:**

Any substance in air that could cause a threat to public health or the environment. Pollutants may solid particles, liquid droplets, gases (alone or in combination). Generally, they fall into the following categories: solids, sulfur compounds, volatile organic chemicals, nitrogen compounds, oxygen compounds, halogen compounds, radioactive compounds, and odors.

**Chlorofluorocarbons (CFCs):**

A family of chemicals used in refrigeration, air conditioning, packaging, insulation, or as solvents and aerosol propellants.

**Conditionally Exempt Small Quantity Generator:**

Generators of less than 100 kilograms (220 pounds) per month of hazardous waste.

**Direct Discharger:**

A municipal or industrial facility that introduces pollution directly to a waterway through a conveyance system such as outlet pipes.

**EPA Identification Number:**

A 12-character, site specific identification number required by hazardous waste facilities, including small and large quantity generators.

**Indirect Discharge:**

Commercial or industrial facilities that discharge pollutants through local sewers into a publicly owned waste-treatment system.

**Large Quantity Generator:**

Facility that generates 1000 kgs. (2200 lbs.) or more of hazardous waste, or more than 1 kilogram (2.2 pounds) of acutely hazardous waste in any month.

**National Pollutant Discharge Elimination System (NPDES):**

A provision of the Clean Water Act that prohibits discharge of pollutants into waters of the United States unless a permit is issued.

**POTWs (Publicly Owned Treatment Works):**

Public sewage/wastewater treatment facilities. POTWs are usually owned and operated by cities or municipalities.

**Pretreatment:**

Processes used to reduce or eliminate wastewater pollutants before they are discharged into a POTW.

**SIC Codes:**

Standard Industrial Classification codes. An indexing and classification system of business types. The SIC was developed by the U.S. Department of Commerce and is used for census and statistical information.

**Sanitary Waste:**

Waste discharged from sinks, showers, kitchens, rest rooms or other nonindustrial operations.

**Small Quantity Generator (SQG):**

A facility that generates more than 100 kgs. (220 lbs.) and less than 1000 kilograms (2200 pounds) of hazardous waste a month.

**Storm Water:**

Runoff from a storm event, snowmelt runoff, surface runoff and drainage.

**Storm Sewer:**

A system of pipes (separate from sanitary sewers) that carries only water runoff from buildings and land surfaces.

**TSD Facility:**

An Ohio EPA-permitted facility that conducts hazardous waste treatment, storage or disposal activities.

### **Ohio EPA Division of Hazardous Waste Management Ohio Facilities Accepting Hazardous Waste**

The following is a list of commercial facilities in Ohio accepting hazardous waste. Users should contact each facility for a complete description of services. Users should also check the compliance status of the facility they work with. For additional information, contact Ohio EPA's Division of Hazardous Waste Management at (614) 644-2917.

Ashland Distribution Co.  
2854 Springboro Road  
Dayton, Oh 45439  
(800) 637-7922  
Storage/Transfer

Chemical Solvents  
1010 Denison Ave.  
Cleveland, OH 44109  
(216) 741-9310  
Solvent Recycling, Fuel Blending

Chemtron Corporation  
35850 Scheneider  
Avon, Ohio 44011  
(800) 676-5091  
Solvent Recycling, Fuel Blending,  
Mercury Recovery

Clean Harbors  
4879 Spring Grove  
Cincinnati, Ohio 45232  
(513) 681-5738  
Fuel Blending, Stabilization,  
Aqueous Treatment

Clean Harbors of Cleveland  
2900 Broadway  
Cleveland, Ohio 44115  
(216) 429-2402

Detrex Corporation  
1410 Chardon Road  
Euclid, Ohio 44117  
(216) 692-2464  
Storage/Transfer

Envirite of Ohio Inc  
2050 Central Ave. SE  
Canton, Ohio 44707  
(330) 456-6238  
Chemical Precipitation, Chemical Treatment

Environmental Enterprises  
4650 Spring Grove  
Cincinnati, Ohio 45232  
(513) 541-1823  
Fuel Blending, Treatment, Stabilization

Environmental Purification  
2111 Champlain Street  
Toledo, Ohio 43611  
(419) 727-0495  
Thermal Treatment

Envirosafe Services of Ohio  
876 Otter Creek Road  
Oregon, Ohio 43616  
(419) 698-3500  
Landfill

Hukill Chemical  
7013 Krick Road  
Bedford, Ohio 44146  
(440) 232-9400  
Fuel Blending, Solvent Recycling

Klor Kleen Inc.  
3118 Spring Grove Ave.  
Cincinnati, Ohio 45225  
(513) 681-0060  
Storage/Transfer

**Ohio EPA**  
**Division of Hazardous Waste Management**  
**Ohio Commercial Facilities Accepting Hazardous Waste**  
**(continued)**

Onyx Environmental Recycling  
4301 Infirmary Road  
West Carrollton, Ohio 45449  
(937) 859-6101  
Fuel Blending, Solvent Recycling

Perma-Fix of Dayton  
300 S. West End Ave.  
Dayton, Ohio 45247  
(937) 268-6501  
Storage/Transfer, Aqueous Treatment

General Environmental Management  
2655 Transport Road  
Cleveland, Ohio 44115  
(216) 621-3694  
Aqueous Organic & Inorganic Treatment

Reserve Environmental Services  
4633 Middle Road  
Ashtabula, Ohio 44004  
(440) 992-2162  
Chemical Precipitation

Ross Incineration  
36790 Giles Road  
Grafton, Ohio 44044  
(440) 748-2200  
Incineration Services

Safety Kleen  
581 Milliken Drive SE  
Hebron, Ohio 43025  
(740) 929-3532  
Solvent Recycling

Systech Environmental Corp.  
11397 CO. RD. 176  
Paulding, Ohio 45879  
(419) 399-4835  
Fuel Blending

Von Roll America Inc.  
1250 Saint George St.  
East Liverpool, Ohio  
(330) 385-7336  
Incineration

Vickery Environmental  
3956 State Route 412  
Vickery, Ohio 43464  
(419) 547-7791  
Underground Injection

Re-Gen Inc.  
1040 Pine Ave. SE  
Warren, Ohio 44481  
(330) 841-8200  
Acid Regeneration

### **Ohio EPA Office of Pollution Prevention Commercial Used Oil Marketers and Recyclers**

The used oil processors/handlers below were obtained from the list of companies that have notified Ohio EPA as used oil marketers. Please note that this list is only a partial representation of recyclers and is updated periodically. This list should not be seen as an endorsement or approval of the businesses by Ohio EPA. Users of this list are encouraged to research the compliance status of any business they utilize. For additional information, contact Ohio EPA, Office of Pollution Prevention at (614) 644-3469 or visit OPP's Web site at [www.epa.state.oh.us/opp/wastex.html](http://www.epa.state.oh.us/opp/wastex.html).

American Energy Products  
of Indiana, Inc.  
375 Columbus Road  
Mount Vernon, Ohio 43050  
Telephone: (800) 201-0988  
Fax: (740) 397-3943

American Energy Products  
of Indiana, Inc.  
310 Huron Street  
Elyria, Ohio 44035  
Telephone: (800) 322-6139  
Fax: (440) 322-4520

Best Solutions Environmental, Inc.  
120 Citycentre Drive, Box 7  
Cincinnati, Ohio 45216  
Telephone: (513) 821-2600  
Fax: (513) 821-2649

Central Ohio Oil, Inc.  
795 Marion Rd.  
Columbus, Ohio 43027  
Telephone: (614) 443-9728  
Fax: (614) 444-5552

Chemical Solvents, Inc.  
1010 Old Deinson Ave.  
Cleveland, Ohio 44109  
Telephone: (216) 741-9310  
Fax: (216) 741-4080

Clean Harbors  
2940 Independence Road  
Cleveland, Ohio 44115  
Telephone: (216) 429-2402  
Fax: (216) 883-1918

Cousins Waste Control Corp.  
1801 East Matzinger Road  
Toledo, Ohio 43612  
Telephone: (419) 726-1500  
Fax: (419) 729-8501

DISC Environmental Service, Inc.  
151 E. Andrus Rd.  
P.O. Box 530  
Walbridge, OH 43465  
Telephone: (419) 691-3451  
Fax: (419) 691-4390

First Recovery  
3737A Fisher Rd.  
Columbus, Ohio 43228  
Telephone: (800) 545-3520  
Fax: (800) 362-1494

Hazleton Oil Salvage  
Route 309  
Hazleton, PA  
Telephone: (800) 458-3496



**Ohio EPA  
Office of Pollution Prevention  
Commercial Used Oil Marketers and Recyclers  
(continued)**

Heritage Environmental Services  
2851 South Ave.  
Toledo, Ohio 43609  
Telephone: (419) 389-1451  
Fax: (419) 389-1702

Hukill Chemical Corporation  
7013 Krick Rd.  
Bedford, Ohio 45430  
Telephone: (440) 232-9400  
Fax: (440) 232-9477

Peerless Oil Service  
P.O. Box 173  
North Olmsted, Ohio 44070  
Telephone: (216) 777-6629

Perma-Fix, Inc.  
300 S. West End Ave.  
Dayton, Ohio 45427  
Telephone: (513) 268-6501  
Fax: (937) 268-5734

Petroleum Products, Inc.  
4608 Central College Rd.  
Westerville, Ohio 43081  
Phone: (614) 882-2278

Petroleum Products, Inc.  
628 Keen St.  
Zanesville, Ohio 43701  
Telephone: (614) 855-3934  
Fax: (614) 855-7407

Research Oil  
2655 Transport Rd.  
Cleveland, Ohio 44115  
Telephone: (216) 623-8383  
Fax: (216) 623-8424

Safety Kleen Corp  
4465 Marketing Pl.  
Groveport, Ohio 43125  
Telephone: (614) 836-2505  
Fax: (614) 836-1336

Systech Environmental Corporation  
11397 Road 176  
Paulding, Ohio 45879  
Telephone: (419) 399-4835  
Fax: (419) 399-4876

Commercial Ulman Lubricants Co.  
2846 E. 37th St.  
Cleveland, Ohio 44115  
Telephone: (216) 441-7200  
Fax: (216) 441-7205

### **Ohio EPA Office of Pollution Prevention Used Oil Filter Transportation and Recycling Services**

The companies listed below provide used oil filter transportation or recycling services in Ohio. Please note that this list is only a partial representation of companies, and it should not be seen as an endorsement or approval of the businesses by Ohio EPA. Users of the list are encouraged to research the compliance status of any business they utilize. For additional information, contact Ohio EPA, Office of Pollution Prevention at (614) 644-3469 or visit OPP's Web site at [www.epa.state.oh.us/opp/wastex.html](http://www.epa.state.oh.us/opp/wastex.html).

Advanced Recycling Technology, Inc.  
5238 Broadway  
Lancaster, New York 14086  
Telephone: (716) 681-7938

American Resource Recovery, Ltd.  
P.O. Box 306  
Maywood, Illinois 60153  
Telephone: (800) 841-6900 or (708) 681-3999  
Fax: (708) 681-5583

Crystal Clean Parts Washer Service  
7817 West Morris Street  
Indianapolis, Indiana 46231  
Telephone: (317) 486-2770

Detrex Corporation  
322 International Parkway  
Arlington, Texas 76011  
Telephone: (800) 727-6461  
Fax: (817) 633-6834

Drug and Laboratory Disposal, Inc.  
331 Broad Street  
Plainwell, Michigan 49080  
Telephone: (616) 685-9824  
Fax: (616) 685-1130

Northeast Environmental Services, Inc.  
732 Smithtown Bypass, Suite 200  
Smithtown, N.Y. 11787  
Telephone: (516) 724-9496  
Fax: (516) 724-0184

Environmental Enterprises  
10163 Cincinnati-Dayton Road  
Cincinnati, Ohio 45241  
Telephone: (513) 541-1823 or (800) 453-7230  
Fax: (513) 541-1638

First Recovery- Ecoguard, Inc.  
301 East Main Street  
Lexington, Kentucky 40507  
Telephone: (606) 357-7389

Key Environmental  
287 Lackawanna Drive  
Andover, New Jersey 07821  
Telephone: (800) 821-9741

Liquid Waste Removal, Inc.  
500 South Polk Street, Suite 100  
Greenwood, Indiana 46142  
Telephone: (317) 881-9754  
Fax: (317) 889-0383

M & M Chemical & Equipment, Inc.  
1229 Valley Drive  
Attalla, Alabama 35954  
Telephone: (256) 538-3800  
Fax: (256) 541-1638

Metropolitan Diesel Supply, Inc.  
18211 Weaver Street  
Detroit, Michigan 48228  
Telephone: (313) 272-6370  
Fax: (313) 272-9280

**Ohio EPA**  
**Office of Pollution Prevention**  
**Used Oil Filter Transportation and Recycling Services**  
**(continued)**

Phillip Services Corporation  
515 Lyncaste St.  
Detroit, Michigan 48214  
Telephone: (313) 824-5534 or 5836  
Fax: (313) 824-5423

Oil Filter Recyclers of Illinois  
P.O. Box 72  
Easton, Illinois 62633  
Telephone: (309) 329-2131  
Fax: (309) 329-2355

Research Oil Company  
Site Address: 2655 Transport Road  
Cleveland, Ohio 44115  
Telephone: (216) 623-8383  
Fax: (216) 623-8424

Safety-Kleen Corporation  
1000 North Randall Road  
Elgin, Illinois 60123  
Telephone: (800) 669-5740

Tonawanda Tank Transport Service, Inc.  
1140 Military Road  
Buffalo, New York 14217  
Telephone: (716) 873-9703  
Fax: (716) 877-0227

Tri-Star Environmental, Inc.  
257 West South  
Salt Lake City, Utah 84115  
Telephone: (800) 967-6993  
Fax: (801) 269-0335

United Recyclers Services of Texas, Inc.  
1340 Manufacturing Street  
Dallas, Texas 75207  
Telephone: (800) 886-5657 or (214) 748-5764  
Fax: (214) 761-1039

### **Ohio EPA Office of Pollution Prevention Antifreeze Recycling Services**

The following list identifies companies that provide antifreeze recycling services. Please note that this list is only a partial representation of providers and is updated periodically. This list should not be seen as an endorsement or approval of the businesses by Ohio EPA. Users of this list are encouraged to research the compliance status of any business they utilize. For additional information, contact Ohio EPA, Office of Pollution Prevention at (614) 644-3469 or visit OPP's Web site at [www.epa.state.oh.us/opp/wastex.html](http://www.epa.state.oh.us/opp/wastex.html).

American Energy Products of Indiana, Inc.  
375 Columbus Road  
Mount Vernon, Ohio 43050  
Phone: (800) 201-0988

American Energy Products of Indiana, Inc.  
310 Huron Street  
Elyria, Ohio 44035  
Phone: (800) 322-6139

Colyeco, Inc.  
P.O. Box 60064  
Harrisburg, PA 17106  
Phone: (717) 232-1122

Crystal Clean/Petroleum Management  
3970 West 10th Street  
Indianapolis, Indiana 46222  
Phone: (800) 769-7622

Dickinson Antifreeze Recycling  
975 Plymouth East Road  
Greenwich, OH 44837  
Phone: (419) 752-2691

EnviroFreeze Inc.  
9009 Quince Street  
Henderson, CO 80640  
Phone: (303) 289-7227

First Recovery  
3737A Fisher Road  
Columbus, Ohio 43228  
Phone: (800) 545-3520

Glvcol Specialists, Inc.(GSD)  
5915 N. Broadway  
Denver, Colorado 80216  
Phone: (303) 292-2000

Hi-Tech Antifreeze Recycling & Recovery  
RR2, Box 2528  
Brewick, PA 18603  
Phone: (717) 759-7843

Max-Tech Antifreeze Recycling  
P.O. Box 345  
Toledo, OH 43697  
Phone: (800) 360-6299

Research Oil  
2777 Rockefeller Avenue  
Site Address: 2655 Transport Road  
Cleveland, Ohio 44115  
Phone: (216) 623-8383

R. Harris Services  
1440 Harding Avenue  
Hershey, PA 17033  
Phone: (717) 533-6353

Safety Kleen  
581 Milliken Dr. SE  
Hebron, Ohio 43025-9687  
Phone: (740) 929-3532

TDA Antifreeze Recycling  
Phone: (800) 587-4009  
Fax: (614) 587-2280



**Ohio EPA  
Office of Pollution Prevention  
Mercury Recyclers**

A & B Iron & Metal Co., Inc.  
329 Washington St.  
Dayton, OH 45402  
Phone: (513) 228-1561  
Fax: (513) 220-6236

Adrow Chemical  
2 Lines Ave.  
Wanaque, NJ 07465  
Phone: (201) 839-2372  
Fax: (201) 244-9448

AERC.com, Inc.  
2591 Mitchell Ave.  
Allentown, PA 18103  
Phone: (610) 797-7608 or (800) 554-2372

Advanced Recovery Systems, Inc.  
PO Box 2231  
North Canton, OH 44720  
Phone: (216) 494-9364

Ashtabula Salvage Company  
P.O. Box 800  
Ashtabula, OH 44004  
Phone: (216) 997-5341

Bethlehem Apparatus  
890 Front St., P.O. Box Y  
Hellertown, PA 18055  
Phone: (610) 838-7034  
Fax: (610) 838-6333

Bellefontaine Recycling  
117 Buckingham Ave. W.  
Bellefontaine, OH 43311  
Phone: (513) 592-2514

C & E Recycling  
204 E. Railroad St.  
Columbiana, OH 44408  
Phone: (216) 482-2357

Clean Harbors  
2950 Independence Rd.  
Cleveland, OH 44115  
Phone: (216) 429-2402  
Fax: (216) 883-1918

DF Goldsmith Chemical and Metal  
909 Pitner Ave.  
Evanston, IL 60202  
Phone: (847) 869-7800  
Fax: (847) 869-2531

Environmental Enterprises, Inc.  
10163 Cincinnati-Dayton Rd.  
Cincinnati, OH 45241  
Phone: (800) 722-2818  
Fax: (513) 782-8950

Marcon Recycling Center  
P.O. Box 2001  
Marietta, OH 45750  
Phone: (614) 374-5467

Molise Paper & Metal Recycling  
1271 E. 289th St.  
Wickliffe, OH 44092  
Phone: (216) 944-8819  
Fax: (216) 944-0964

MRS (Mercury Recovery Services)  
700 5th Ave.  
New Brighton, PA 12205  
Phone: (412) 843-5000  
Fax: (412) 843-5353

Mercury Refining Co.  
1218 Central Ave.  
Albany, NY 12205  
Phone: (518) 459-0820  
Fax: (518) 459-2334

Mercury Waste Solutions, Inc.  
21211 Durand Avenue  
Union Grove, WI 53182  
Phone: (800) 741-3343 or (816) 554-8080  
Fax: (816) 554-8787

# Environmental Compliance Guide for Motor Vehicle Salvage Yards



## Central District Office (CDO)

3232 Alum Creek Drive  
Columbus, Ohio 43207  
(614) 728-3778

## Northeast District Office (NEDO)

2110 E. Aurora Road  
Twinsburg, Ohio 44087  
(330) 963-1200

## Southeast District Office (SEDO)

2195 Front Street  
Logan, Ohio 43138  
(740) 385-8501

## Northwest District Office (NWDO)

347 N. Dunbridge Road  
Bowling Green, Ohio 43402  
(419) 352-8461

## Southwest District Office (SWDO)

401 East 5<sup>th</sup> Street  
Dayton, Ohio 45402  
(937) 285-6357

### ADDITIONAL RESOURCES

#### **Ohio EPA, Small Business Assistance Office (SBAO)**

**Phone: (614) 728-8573 800-329-7518 Fax: (614) 728-8579**

**[www.epa.state.oh.us/sbao](http://www.epa.state.oh.us/sbao)**

The SBAO offers assistance to small businesses (less than 100 employees) in understanding and complying with any of Ohio's environmental regulations. Services include:

- A hotline for technical assistance
- An information site on the Internet
- Help in obtaining appropriate permits
- Conducting on-site environmental compliance assessments, and
- Providing training opportunities

#### **Ohio EPA, Small Business Assistance Program (SBAP)**

##### **Division of Air Pollution Control**

**Phone: (614) 644-4830 Fax: (614) 644-3681**

**[www.epa.state.oh.us/dapc/sba/sbaintro.html](http://www.epa.state.oh.us/dapc/sba/sbaintro.html)**

The SBAP offers assistance to small businesses (less than 100 employees) in Ohio in understanding and complying with Ohio's air pollution control regulations. Staff from the SBAP can answer questions about the air pollution control regulations, visit sites to evaluate the need for an air permit, and assist in preparing applications for air pollution control permits. The services of the SBAP are free, confidential and available to businesses statewide.

#### **Getting Publications From Ohio EPA's Divisions**

Many of the divisions and offices within Ohio EPA have guidance documents, fact sheets and other written materials available. These publications can be helpful resources for businesses in understanding the environmental regulations. Many of these fact sheets and guidance documents are provided free-of-charge and cover a variety of different topics. If you are interested in knowing more about the specific publications that are available, you can contact the division(s) directly either at the central or district office. Many of the divisions' publications are also currently available through the Agency's web site.

#### **Getting Copies of Ohio EPA's Regulations**

Ohio's environmental regulations are contained in the Ohio Administrative Code (OAC). The regulations are available in sets, each covering a different program area (air, waste, water, etc.). Anyone interested in more information about obtaining copies of regulations can call Ohio EPA's Legal Records Section at (614) 644-2129.

**ADDITIONAL RESOURCES  
(continued)**

**Ohio EPA Internet Web Sites**

Several Ohio EPA divisions have Web sites and offer environmental information to the regulated community. Web sites provide technical resources, including guidance documents and fact sheets and allow businesses to obtain permit applications and information. Some Web page offers county-specific information about permit activities and public notices, and news about special programs.

Air Pollution Control . . . . .	<a href="http://www.epa.state.oh.us/dapc">www.epa.state.oh.us/dapc</a>
Drinking & Ground Waters . . . . .	<a href="http://www.epa.state.oh.us/ddagw">www.epa.state.oh.us/ddagw</a>
Hazardous Waste Management . . . . .	<a href="http://www.epa.state.oh.us/dhwm">www.epa.state.oh.us/dhwm</a>
Solid and Infectious Waste Management . . . . .	<a href="http://www.epa.state.oh.us/dsiwm">www.epa.state.oh.us/dsiwm</a>
Surface Water . . . . .	<a href="http://www.epa.state.oh.us/dsw">www.epa.state.oh.us/dsw</a>
Division of Emergency and Remedial Response . . . . .	<a href="http://www.epa.state.oh.us/derr">www.epa.state.oh.us/derr</a>
Office of Pollution Prevention . . . . .	<a href="http://www.epa.state.oh.us/opp">www.epa.state.oh.us/opp</a>
Public Interest Center . . . . .	<a href="http://www.epa.state.oh.us/pic">www.epa.state.oh.us/pic</a>
Central District Office . . . . .	<a href="http://www.epa.state.oh.us/cdo/cdomain.htm">www.epa.state.oh.us/cdo/cdomain.htm</a>
Northeast District Office . . . . .	<a href="http://www.epa.state.oh.us/nedo/nedo.html">www.epa.state.oh.us/nedo/nedo.html</a>
Northwest District Office . . . . .	<a href="http://www.epa.state.oh.us/nwdo/nwdo.html">www.epa.state.oh.us/nwdo/nwdo.html</a>
Southeast District Office . . . . .	<a href="http://www.epa.state.oh.us/sedo/sedo.html">www.epa.state.oh.us/sedo/sedo.html</a>
Southwest District Office . . . . .	<a href="http://swdoweb.epa.state.oh.us">http://swdoweb.epa.state.oh.us</a>

**Other Environmental Contacts**

Department of Commerce, State Fire Marshal's Office Bureau of Underground Storage Tanks (BUSTR) . . . . .	(614) 752-7938
Ohio Department of Commerce, OSHA Consultation Program General Information . . . . .	(800) 582-1708
On-Site Consultation Service . . . . .	(800) 282-1425

## Compliance Screening Checklist for Motor Vehicle Salvage Yards

The *Environmental Compliance Guide for Motor Vehicle Salvage Yards* and this checklist highlight the major environmental requirements that might apply to your motor vehicle salvage yard. They don't, however, cover every requirement, and should not be used as your only source of information on environmental regulations. The guide and checklist are good starting points to identify regulations that may apply to you and areas where you can improve compliance. This checklist is for your use and you are not required to send it to the Ohio EPA when you are finished. However, if you check any circles ○ on this checklist, you likely have environmental compliance problems at your business. If you need help with the regulations or have additional questions, you should contact your local Ohio EPA district office (see map in guidebook) or the Small Business Assistance Office at (800) 329-7518.

### Air Pollution Control

Yes No N/A

- |  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| • Do you have anything that has stacks, vents or dust collectors?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| • Do you have a paint spray booth or solvent degreasing tanks?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| • Do you have a boiler, furnace or space heater?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| • Do you have any processes that produce visible dust, smoke or odors?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| • Do you crush or shred vehicles?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| • Do you do any metal smelting at your business?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| • If you answered yes to any of the questions above, have you checked into whether you need an Ohio EPA air permit for these activities? | <input type="checkbox"/> | <input type="radio"/>    | <input type="checkbox"/> |

### Open Burning

- |   |                       |                          |                          |
|---|-----------------------|--------------------------|--------------------------|
| • Do you burn waste from your business outside (e.g., trash, tires, pallets, rags)? | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|---|-----------------------|--------------------------|--------------------------|

### Freon Recovery

If you remove air conditioner refrigerants from salvage vehicles:

- |  |                          |                       |                          |
|--|--------------------------|-----------------------|--------------------------|
| • Are your freon recovery technicians certified by U.S. EPA?   | <input type="checkbox"/> | <input type="radio"/> | <input type="checkbox"/> |
| • Do your technicians use U.S. EPA-approved refrigerant recovery equipment?  | <input type="checkbox"/> | <input type="radio"/> | <input type="checkbox"/> |
| • Do you send recovered refrigerant to either an approved reclamation facility or certified auto technician for recycling? | <input type="checkbox"/> | <input type="radio"/> | <input type="checkbox"/> |
| • Do you make sure that refrigerants are not vented into the air?  | <input type="checkbox"/> | <input type="radio"/> | <input type="checkbox"/> |

### Scrap Tires

If you remove tires from salvage vehicles:

- |  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| • Do you store scrap tires outside?  | <input type="radio"/>    | <input type="checkbox"/> | <input type="checkbox"/> |
| • Is your outdoor storage area for scrap tires 2,500 square feet or less (50' x 50')?                              | <input type="checkbox"/> | <input type="radio"/>    | <input type="checkbox"/> |
| • Do you cover outdoor piles or provide other mosquito control?  | <input type="checkbox"/> | <input type="radio"/>    | <input type="checkbox"/> |
| • Do you protect tires from sources of ignition?   | <input type="checkbox"/> | <input type="radio"/>    | <input type="checkbox"/> |
| • Are tire piles are higher than 8 feet?   | <input type="radio"/>    | <input type="checkbox"/> | <input type="checkbox"/> |
| • If you transport scrap tires, have you checked into whether you need to register with Ohio EPA as a transporter? | <input type="checkbox"/> | <input type="radio"/>    | <input type="checkbox"/> |
| • If you use a outside hauler for scrap tires, is the hauler registered with Ohio EPA?                             | <input type="checkbox"/> | <input type="radio"/>    | <input type="checkbox"/> |
| • Do you conduct other scrap tire activities such as shredding or cutting?   | <input type="radio"/>    | <input type="checkbox"/> | <input type="checkbox"/> |



# Compliance Screening Checklist for Motor Vehicle Salvage Yards

## Used Oil

Yes No N/A

If you remove used oil from salvage vehicles:

- Are used oil storage containers or tanks in good condition?  Yes  No  N/A
- Are storage containers or tanks labeled with the words "used oil?"  Yes  No  N/A
- Are you storing used oil in an underground tank?  Yes  No  N/A
- Do you have used oil shipped off-site for recycling or disposal?  Yes  No  N/A
- Does your used oil transporter have an EPA identification number?  Yes  No  N/A
- Is used oil put on the ground to control dust on your property?  Yes  No  N/A
- Do you mix used oil with solvents, brake cleaners or other wastes?  Yes  No  N/A
- Is used oil dumped on the ground or thrown away in your trash?  Yes  No  N/A
- If you've had any spills of used oil, have these been promptly cleaned up?  Yes  No  N/A

If you store used oil or petroleum products (e.g., gas, diesel fuel):

- Do you have a total above ground capacity of 1,320 gallons or more?  Yes  No  N/A
- Do you have more than 42,000 gallons of underground storage capacity?  Yes  No  N/A
- If you have any of the above capacities, are you in compliance with Ohio EPA's spill prevention (SPCC) requirements? [This includes having secondary containment and developing a spill prevention plan for your company.]  Yes  No  N/A

## Oil Filters

If you remove used oil filters from salvage vehicles:

- Is used oil removed from filters before they are recycled or disposed of?  Yes  No  N/A
- Are you following EPA's guidelines for hot draining oil filters?  Yes  No  N/A
- Do you have used oil filters recycled as scrap metal?  Yes  No  N/A
- Do you throw undrained used oil filters in the trash?  Yes  No  N/A

## Burning Used Oil in Space Heaters

If you burn your used oil in a space heater:

- Is the capacity of your space heater less than 500,000 BTUs per hour?  Yes  No  N/A
- Is your space heater vented outside the building?  Yes  No  N/A
- Do you accept used oil from other businesses and burn it in your space heater?  Yes  No  N/A
- Do you keep records of how much used oil you burn in your space heater?  Yes  No  N/A

## Spill Prevention

- Do you use drip pans around your fluid recovery areas to help collect spills?  Yes  No  N/A
- Do you drain and collect automotive fluids before vehicles are salvaged or stored?  Yes  No  N/A
- Do you have a spill kit for hazardous waste and other liquids?  Yes  No  N/A

## Compliance Screening Checklist for Motor Vehicle Salvage Yards

### Antifreeze

Yes No N/A

If you remove antifreeze from salvage vehicles:

- |  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| • Do you send antifreeze off-site to a disposal or recycling company?                              | <input type="checkbox"/> | <input type="radio"/>    | <input type="checkbox"/> |
| • Are containers of collected antifreeze in good condition and managed to prevent leaks or spills? | <input type="checkbox"/> | <input type="radio"/>    | <input type="checkbox"/> |
| • Is antifreeze put into the sewer or septic system?   | <input type="radio"/>    | <input type="checkbox"/> | <input type="checkbox"/> |
| • Is antifreeze dumped on the ground or put into your trash?                                       | <input type="radio"/>    | <input type="checkbox"/> | <input type="checkbox"/> |

### Hazardous Waste

- |  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| • Have you evaluated all of your waste streams to determine whether they meet Ohio EPA's definition of hazardous waste?                | <input type="checkbox"/> | <input type="radio"/>    | <input type="checkbox"/> |
| • Do you have your waste evaluation information in your files?   | <input type="checkbox"/> | <input type="radio"/>    | <input type="checkbox"/> |
| • Have you evaluated your spent solvents to see if they are hazardous?   | <input type="checkbox"/> | <input type="radio"/>    | <input type="checkbox"/> |
| • Do you make sure that gasoline removed from vehicles is collected in a container and NOT allowed to evaporate from a collection pit? | <input type="checkbox"/> | <input type="radio"/>    | <input type="checkbox"/> |
| • Is gasoline drained directly onto the ground?  | <input type="radio"/>    | <input type="checkbox"/> | <input type="checkbox"/> |
| • Are all hazardous wastes sent to an Ohio EPA-permitted disposal company or recycling company?  | <input type="checkbox"/> | <input type="radio"/>    | <input type="checkbox"/> |
| • Do you know how much hazardous waste you generate in a month?  | <input type="checkbox"/> | <input type="radio"/>    | <input type="checkbox"/> |
| • Do you know if you need a hazardous waste identification number?   | <input type="checkbox"/> | <input type="radio"/>    | <input type="checkbox"/> |
| • Do you know if you are complying with all of the Ohio EPA hazardous waste generator requirements?                                    | <input type="checkbox"/> | <input type="radio"/>    | <input type="checkbox"/> |

### Solvent Contaminated Shop Rags/Wipers

If you generate solvent contaminated shop rags:

- |   |                          |                          |                          |
|---|--------------------------|--------------------------|--------------------------|
| • Have you evaluated shop rags to see if they're hazardous waste?               | <input type="checkbox"/> | <input type="radio"/>    | <input type="checkbox"/> |
| • Are used shop rags put in a closed container so solvents don't evaporate off? | <input type="checkbox"/> | <input type="radio"/>    | <input type="checkbox"/> |
| • Do you burn any of your shop rags in a burn barrel?                           | <input type="radio"/>    | <input type="checkbox"/> | <input type="checkbox"/> |
| • Do you dispose of your solvent contaminated shop rags in the trash?           | <input type="radio"/>    | <input type="checkbox"/> | <input type="checkbox"/> |

### Lead Acid Batteries

If you remove lead acid batteries from salvage vehicles:

- |  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| • Are lead acid batteries stored on-site in a manner to prevent leaks or spills? | <input type="checkbox"/> | <input type="radio"/>    | <input type="checkbox"/> |
| • Do you send lead acid batteries off-site to a recycling company?               | <input type="checkbox"/> | <input type="radio"/>    | <input type="checkbox"/> |
| • Do you reclaim any lead acid battery components yourself?                      | <input type="radio"/>    | <input type="checkbox"/> | <input type="checkbox"/> |

# Compliance Screening Checklist for Motor Vehicle Salvage Yards

## Wastewater Discharges

Yes	No	N/A
-----	----	-----

If you have floor drains or generate wastewater from your salvage operations (e.g., clean up, washing, oil/water separator):

- |  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| • Do you know where your wastewater and floor drain discharges go?   | <input type="checkbox"/> | <input type="radio"/>    | <input type="checkbox"/> |
| • If your wastewater goes to a creek, river or other water of the state, do you have a discharge (NPDES) permit from Ohio EPA? | <input type="checkbox"/> | <input type="radio"/>    | <input type="checkbox"/> |
| • If your wastewater goes to a public wastewater treatment plant, do you have permission or a permit for the discharge?        | <input type="checkbox"/> | <input type="radio"/>    | <input type="checkbox"/> |
| • Does your wastewater go to a dry well, cesspool, septic tank, or leach field?  | <input type="radio"/>    | <input type="checkbox"/> | <input type="checkbox"/> |
| • Does your wastewater go to a storm drain?  | <input type="radio"/>    | <input type="checkbox"/> | <input type="checkbox"/> |
| • Does your wastewater go outside onto the ground?   | <input type="radio"/>    | <input type="checkbox"/> | <input type="checkbox"/> |
| • Do you put other materials like oil, solvent, paints or chemicals into your drains?  | <input type="radio"/>    | <input type="checkbox"/> | <input type="checkbox"/> |

## On-Site Septic System

If your business has its own on-site septic system:

- |  |                          |                       |                          |
|--|--------------------------|-----------------------|--------------------------|
| • Has the system been approved and permitted by Ohio EPA?  | <input type="checkbox"/> | <input type="radio"/> | <input type="checkbox"/> |
| • Do you make sure that only sanitary wastewater from restrooms and sinks is sent to the septic system (no process wastewater or chemicals)? | <input type="checkbox"/> | <input type="radio"/> | <input type="checkbox"/> |

## Storm Water Permits

- |   |                          |                       |                          |
|---|--------------------------|-----------------------|--------------------------|
| • Do you have a storm water permit from Ohio EPA for your salvage yard? | <input type="checkbox"/> | <input type="radio"/> | <input type="checkbox"/> |
| • Do you have a storm water pollution prevention plan?                  | <input type="checkbox"/> | <input type="radio"/> | <input type="checkbox"/> |

## Underground Storage Tanks

If you have underground storage tanks for petroleum or hazardous substances:

- |   |                          |                       |                          |
|---|--------------------------|-----------------------|--------------------------|
| • Do you know if your business is in compliance with Ohio's underground tank (UST) regulations? | <input type="checkbox"/> | <input type="radio"/> | <input type="checkbox"/> |
|---|--------------------------|-----------------------|--------------------------|

---

### NOTES:

If you've checked any circles  on this checklist, you likely have environmental compliance problems at your business. If you need help with the regulations or have additional questions, you should contact your local Ohio EPA district office (see map in guidebook) or the Small Business Assistance Office at (800) 329-7518.

## **Acknowledgements:**

Thanks to the Florida Department of Environmental Protection and Florida Center for Solid and Hazardous Waste Management for sharing your resources with us. Also, thanks to Damron Auto Parts, Crystal River, Florida for permission to use photos.

Portions of the mercury switch section of this guidebook were reprinted with permission from fact sheets entitled *Managing Mercury Switches: Information for Vehicle Dismantlers and Crushers*, State of Oregon, Department of Environmental Quality and *Managing Mercury Switches*, from the Minnesota Pollution Control Agency. We thank each for sharing their resources with us.

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