

AUTO REPAIR

FLORIDA ENVIRONMENTAL COMPLIANCE ASSISTANCE



SELF-AUDIT WORKBOOK

Published by:
Florida Department of Environmental Protection
Bureau of Solid and Hazardous Waste



Environmental Compliance Assistance for Auto Repair Shops

Self-Audit Workbook

Published by:



Florida Department of Environmental Protection (FDEP)
Bureau of Solid and Hazardous Waste
Hazardous Waste Regulation Section (RCRA)

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For use with the associated Compliance Checklist

This document was published to help auto repair shops determine whether they are in compliance with certain federal and state environmental requirements. It may be used along with the associated Compliance Checklist to help a repair shop through the self-audit process.

The Workbook also includes best management practices (BMPs) that go beyond what is required by regulations. This information is offered only as guidance. Specific requirements may vary with individual processes and/or businesses. Business owners are responsible for obtaining complete information about all applicable regulations. The Florida Department of Environmental Protection is not authorized to relieve any person from any requirement of federal regulations or state, county or local laws through this Workbook.

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1.0 Introduction

This Workbook is published as part of the Florida Department of Environmental Protection's compliance assistance program. It is intended to help shops perform a self-audit to see if they comply with certain federal and state environmental regulations. A checklist is also provided to aid in that self-audit process. Using this Workbook will help an automotive repair shop comply with environmental regulations and improve its environmental performance through best management practices.

What is the benefit of a self-audit?

By using this workbook and the associated checklist as a do-it-yourself environmental inspection, you will be better prepared for a regulatory visit. If you keep the checklist and periodically re-check your processes, you will be showing a good-faith effort in maintaining compliance. A visiting inspector can then focus on helping you with things you may not understand, instead of taking enforcement because you did not try.



While this Workbook does address most federal and state environmental requirements that apply to automotive repair shops, your shop may need to meet additional requirements that are not covered in this Workbook. For example, requirements related to storage tanks, petroleum contact water, air emissions and permitting, water resources management and permitting (such as those related to storm water or wetlands), industrial waste permitting, wellhead protection, use of state lands, hazardous substance discharge reporting, and other requirements may apply to your shop, depending on your shop's operations. In addition, this Workbook does not cover OSHA requirements or address liability for pollution or spills that may have occurred on your property in the past. If you are unsure whether additional requirements apply to your shop, please call FDEP. District office contacts are shown by county on the back of this publication, or call us at 850-245-8707.

Your shop may also need to meet additional local requirements. To find out, call your county hazardous waste contact listed in Appendix III.

I.1 HOW TO USE THIS WORKBOOK

Chapters for All Auto Repair Shops

Most of the chapters in this Workbook (Chapters 1, 2 and 5) apply to all automotive repair shops. These chapters use the same **blue color theme** as this page and also say "All Repair Shops" at the top of the blue band at the edge of each page. Be sure to read and complete each chapter that applies to all repair shops.

Chapters for Hazardous Waste Handlers

Shops that handle hazardous waste should complete either Chapter 3 for Conditionally Exempt Small Quantity Generators (CESQGs) of hazardous waste--**green color theme**--or Chapter 4 for Small Quantity Generators (SQGs) of hazardous waste--**red color theme**. Reviewing Chapter 2 and completing the Chapter 2 Worksheets will help you determine if you handle wastes that are regulated as hazardous wastes and, if so, whether you are a CESQG, SQG, or Large Quantity Generator (LQG). Automotive repair shops very rarely generate hazardous waste in LQG amounts, so this Workbook is not designed to cover all regulations that apply to LQGs. If you believe your shop is an LQG, please call FDEP for assistance. District office contacts are shown by county on the back of this publication, or call us at 850-245-8707.

Most Chapters Are Divided into Sections

Each section covers a particular kind of compliance concern. For example, Chapter 5, "Managing Common Auto Repair Shop Wastes," has individual sections for waste batteries, used oil, used filters, used coolant/antifreeze, etc.

Sections Are Divided into Parts

Each section has several parts, which are usually in the following order:

- a. **Routing Question:** At the very beginning of some sections in Chapters 3, 4 and 5 there is an arrow that says "Answer this question first" followed by a question and instructions that will tell you to complete the section or to skip it. For example, if your shop does not generate used coolant/antifreeze, you may skip questions related to used coolant/antifreeze.
- b. **Overview:** At the beginning of all sections there is a brief overview of the topic for that section.
- c. **Regulatory Requirements:** This important part of each section describes the main federal and state environmental requirements for handling and storing waste, training employees, responding to spills and other emergencies, properly disposing of waste and documenting waste handling activities.
- d. **Best Management Practices (BMPs):** BMPs describe optional steps that may save you money and can better protect the health of your workers, the community, and the environment. BMPs often provide more detail than regulatory requirements about exactly what your shop can do to prevent pollution and protect the environment.
- e. **Compliance Worksheet/Questions:** Each section also contains a compliance worksheet and/or question(s) that will help you determine how you should answer the questions on the compliance checklist.

As shown in the example below, each question has a pair of check boxes to make it easy to keep track of your answers. ☒ boxes are for marking YES answers, and ☐ boxes are for marking NO answers.

Workbook questions that match sections on the compliance checklist are placed inside large brightly colored arrows (color coded by generator status: all shops, CESQG, SQG) that tell you where to put your answers on the checklist. In the Routing Question example below, because the automotive repair shop marked the ☒ box, it should also mark **[YES]** for Question #5 on the compliance checklist.

Sample Routing Question:

ANSWER THIS QUESTION FIRST:

Does your shop store hazardous waste on-site prior to treatment or disposal?

YES - Complete this section

NO - Skip to Section 3.2

5.



This is the answer to question #5 on the compliance checklist

Sample Yes/No Question:

15a. If your waste batteries are recycled, do you keep records of your recycling waste batteries for three years?



1.2 HOW TO COMPLETE THE COMPLIANCE CHECKLIST



1 Review This Workbook.

This Workbook includes detailed explanations of regulatory requirements and BMPs. It contains worksheets and questions that will help you determine if you meet the requirements. The Workbook explains how to complete the compliance checklist. Complete every section of the Workbook, unless the instructions tell you to skip over a section.

2 Fill Out the Checklist.

Your answers on the checklist will come from your answers to Workbook questions and will let you know if you are in compliance with the regulations addressed in this Workbook. Go through your shop with the Workbook and the compliance checklist. Write your answers on the checklist and save your clean copy of the workbook to use again the next time you do a self-audit.

3 Correct Compliance Issues As Necessary.

Most compliance violations described in this Workbook can easily be corrected within a few days. You should fix any violations you find as soon as possible and make a note on your compliance checklist of the specific action that you took and the date. If you keep this record, you will be able to show an inspector that you took quick action to fix any violations.

4 Repeat the Self-Audit Periodically.

The FDEP suggests that you follow the steps above at least annually to help you make sure you remain in compliance. There is a log sheet provided in Appendix VII to record your self-audits.

This Workbook is designed to help you understand how you can meet the requirements that apply to your shop. If you find that you are not currently meeting requirements, you should carefully review the relevant section of the Workbook to determine what steps you need to take to come into compliance. If you have additional questions on how to return to compliance, please refer to Appendix II, Resources and References, in this Workbook. If you still have questions, please call FDEP. District office contacts are shown by county on the back of this publication, or call us at 850-245-8707.

1.3 POLLUTION PREVENTION (P2)

Pollution Prevention, or P2, is the efficient use of resources (such as energy, raw materials, and water) to reduce or eliminate the use or release of substances that cause pollution and could harm people or the environment. Auto repair shops that implement P2 very often cut costs and increase profits. You may already be practicing P2 without knowing it.



There are four basic categories of P2 for auto shops:

1 Using smaller amounts of dangerous chemicals, or replacing them with less dangerous ones

Examples:

- ▶ Using an aqueous, hands-free parts washer instead of a solvent-based unit with direct exposure;
- ▶ Substituting detergent-based solution for caustic solution when cleaning parts, floors, etc.;
- ▶ Switching to a non-chlorinated brake cleaner and carburetor cleaner;
- ▶ Reducing the amount of aerosol cleaner used in each cleaning job;
- ▶ Pre-cleaning parts with a squeegee, rag or wire brush to reduce use of solvents; and
- ▶ Using steam, pressure washing or heat baths instead of chemical solvents.

2 Recycling or reusing materials instead of letting them go to waste

Examples:

- ▶ Recycling used oil and coolant/antifreeze;
- ▶ Using drip pans to collect leaking fluid for recycling whenever possible, instead of cleaning up with absorbent;
- ▶ Using separate containers for used oil and coolant/antifreeze collection;
- ▶ Storing partially used absorbents in closed, labeled containers for reuse; and
- ▶ Using cloth towels that can be commercially laundered and reused, instead of disposable towels. Do not wash shop towels on-site if your washing machine drains to a septic tank.

3 Good housekeeping practices

Examples:

- ▶ Storing and using aerosol solvents far away from parts washers;
- ▶ Keeping containers of liquids, including parts washers, covered and cool to reduce evaporation;
- ▶ Labeling all waste containers to prevent contamination of non-hazardous waste; and
- ▶ Covering the steam cleaning area and constructing a berm around it to prevent water, oil, and grease residue from leaving the area.
- ▶ Use a first in, first out policy for product storage areas to prevent materials from becoming outdated.

4 Water and energy conservation

Examples:

- ▶ Installing a closed loop 100% recycling water system for vehicle washing;
- ▶ Using a self-contained floor scrubber with a closed loop wash pad that removes oil, and then filters and reuses the water; and
- ▶ Installing fluorescent light bulbs instead of incandescent bulbs.

Correctly practiced, P2 is not a one-time effort, but a core part of day-to-day operations and long-term planning.

What can P2 do for me?

P2 can save you money and can make it easier for you to meet most of the environmental requirements in this Workbook. P2 improvements can reduce or eliminate your hazardous waste, increase your productivity, and improve the safety of your shop.

Take Larry's Autoworks, a full service auto repair shop with 6 technicians. Larry's replaced 2 solvent sinks, serviced every 1.5 months, with a sink-top unit that biodegrades the oil and a water-based spray cabinet that uses water and detergents. The new units save Larry's \$14,874 annually by cutting cleaning labor costs by more than 50%. The units, one purchased used, cost only \$2,900, an investment that was paid back in just two months.



2.0 What in Your Shop Could Be a Hazardous Waste?

Do you generate Hazardous Waste? You may without even knowing it. Common chemical products that become wastes at many auto repair shops have been identified by the US EPA as "hazardous wastes." Many of these are wastes that you may not recognize as "hazardous." In this Workbook the terms "hazardous" and "hazardous waste" mean "legally defined as hazardous." "Not hazardous waste" means the waste is not legally defined as hazardous, even though there may be some danger when the material is mishandled.

This chapter will help you:

- ▶ Identify which common auto repair shop wastes are hazardous wastes;
- ▶ Measure the amount of hazardous waste your shop produces or "generates" each month; and
- ▶ Determine your hazardous waste generator status (category).

The hazardous waste regulations found in this Workbook refer only to federal and state requirements. Local requirements for hazardous waste or materials management may apply to your shop. You should call your local city or county government offices, listed in Appendix III, to check if any local regulations apply to your shop.

IMPORTANT NOTE: The following **Shortcut Method** for identifying hazardous waste generated by auto repair shops has been designed to simplify this complex process. The Shortcut Method includes only the wastes that are most commonly generated by auto repair shops, and it makes some assumptions about those wastes that may result in overestimating the amount of hazardous waste that you generate. The generator status of most repair shops will not be increased by using the Shortcut Method. However, the Long Method for Hazardous Waste Determination, found in Appendix IV, may be used if you prefer not to use these assumptions to simplify waste identification. You may also choose to use the Long Method for any of your wastes that you have previously made a hazardous waste determination on (using the criteria described in Appendix IV) and still use the Shortcut Method for all other wastes. **You must use the Long Method for hazardous waste determination for any waste not specifically identified in the Shortcut Method section of this Workbook.**



2.1 THE SHORTCUT METHOD TO HAZARDOUS WASTE IDENTIFICATION*

Listed and described below are some common wastes generated by auto

repair shops. To simplify the hazardous waste determination process, the Shortcut Method assumes that the following types of wastes are hazardous wastes. Enter the maximum amount you generate in any one month of the following wastes (even if they are recycled) on lines 1-11 of Worksheet I on the follow-

- **Waste solvent degreasers, parts washing fluid, immersion cleaner solvent, mineral spirits (including petroleum naphtha), brake cleaner, and carburetor cleaner** - are hazardous wastes, even if recycled on-site or at an off-site recycling facility. Many of the products used in repair shops for cleaning and degreasing contain ignitable or toxic solvents. Distilling on-site reduces the amount of hazardous waste generated and the amount of new solvent you must buy. **Note:** Solvent in a parts washer is considered a useable product up to the date it is serviced. It becomes waste on that day, and the entire amount must be counted for that month.
- **Sludges, filters or bottoms from part cleaners; coolant/antifreeze stills or filtration systems; solvent stills; hot dip tanks, and oil/water separators** - are hazardous wastes because they may contain toxic solvents or metals.
- **Waste aerosol cans that are not completely empty** - aerosols like brake cleaner, carburetor cleaner, other degreasers, and spray paints commonly found at auto repair shops are often hazardous for the chlorinated solvents they contain, or for ignitability. When discarded before they are completely empty, they are hazardous waste.
- **Floor sweepings, paper towels, kitty litter, or other absorbents mixed with any of the above hazardous wastes** - are hazardous wastes. The monthly average of these mixtures that you generate must be included on Worksheet I. **However, floor sweepings, paper towels, kitty litter, or other absorbents mixed with non-hazardous waste such as used oil are not hazardous waste.** See Section 5.7.
- **Waste paint thinners and lacquer thinners** - are hazardous waste for ignitability and potentially for toxic solvents.
- **Waste oil-based paints** - are hazardous wastes for ignitability and potentially for toxic solvents and metals.

Other wastes that may be hazardous wastes:

- **Mixtures of hazardous waste and used oil** - may be hazardous wastes. Management of used oil and mixtures of used oil and other waste is covered in Sections 2.4 and 5.2. If your mixtures of hazardous waste and used oil must be managed as hazardous waste, enter the maximum amount generated in a month on line 12 of Worksheet I.
- **Other wastes NOT recycled** that are hazardous waste if not recycled (from page 12).

If you generate any other wastes that may be considered hazardous, or want to verify those listed above are hazardous, then you must use the Long Method for Hazardous Waste Identification in Appendix IV.

***The Shortcut Method is designed ONLY for use by auto repair shops.**

2.2 MEASURING YOUR HAZARDOUS WASTE STREAMS

Worksheet I - Counting Your Hazardous Waste

Use this worksheet to figure out the monthly amount of hazardous waste generated at your shop. Appendix IV gives more details on what might make these wastes hazardous wastes.

The Shortcut Method assumes these wastes are hazardous wastes.*		Maximum Monthly Generation	
Enter maximum number of pounds of the following wastes you generate in any one month, even if recycled. For liquids, multiply gallons by seven as an approximation of pounds.**		Gallons $\times 7 \text{ lb/gal}^{**} =$	Lbs
1	Waste solvent degreasers	$\times 7 =$	
2	Waste parts washing fluid, whether or not recycled - waste is generated upon parts washer service	$\times 7 =$	
3	Waste mineral spirits including petroleum naphtha, even if distilled on-site	$\times 7 =$	
4	Sludges, filters or bottoms from any of the following: parts washers; coolant/antifreeze stills or filtration systems; solvent stills; hot dip tanks; oil/water separators	$\times 7 =$	
5	Waste aerosol cans with residual contents of hazardous materials such as brake cleaner or other solvents (However, if aerosol cans are used until empty, they do not count as hazardous wastes)		
6	Mixtures of hazardous waste and floor sweepings, paper towels, kitty litter, or other absorbents		
7	Waste Immersion Cleaner solvent	$\times 7 =$	
8	Waste brake cleaner	$\times 7 =$	
9	Waste carburetor cleaner	$\times 7 =$	
10	Waste paint thinners and lacquer thinners	$\times 7 =$	
11	Waste oil-based paints.	$\times 7 =$	
Enter monthly generation for other wastes you have determined to be hazardous waste.		Gallons $\times 7 \text{ lb/gal}^{**} =$	Lbs
12	Mixtures of hazardous waste and used oil - if you must manage as hazardous waste - from Sections 2.4 and 5.2	$\times 7 =$	
13	Wastes not recycled from page 12 that are hazardous waste if not recycled.	$\times 7 =$	
14	Other Hazardous Wastes (include any from Appendix IV).	$\times 7 =$	
Maximum Pounds of Hazardous Waste Generated in any one Month _____			

COMPLIANCE QUESTIONS

Has your shop made a complete and accurate hazardous waste determination on each waste stream using Worksheet I above or Appendix IV?

1.

Y N

This is the answer to question #1 on the compliance checklist.

2.

Y N

This is the answer to question #2 on the compliance checklist.

Does your shop generate hazardous waste?
If YES continue to question 3;
If NO your shop is a non-handler of hazardous waste--skip to Section 5.1.

3

This is the maximum amount of hazardous waste your shop generates in any one month. Record it in question #3 on the compliance checklist -- or use the amount from Appendix IV.

If you have questions or need assistance in determining your hazardous waste generation, go to our web site at: <http://www.dep.state.fl.us/waste/categories/hazardous/pages/AutomotiveCompliance.htm> or call your nearest DEP District representative listed on the back cover.

* The Shortcut Method is designed ONLY for use by auto repair shops.

** An average conversion factor of 7 pounds/gallon is used for liquid wastes.

2.2A OTHER COMMON RECYCLABLE WASTE STREAMS

Other common wastes generated by auto repair shops are almost always recycled.

If you do NOT recycle these wastes, the Shortcut Method* assumes them to be hazardous waste. You must enter the maximum monthly amount of the above wastes that are NOT RECYCLED on line 13 of Worksheet I on page 11 and use those wastes in the overall calculation of your generator status.

These materials are NOT hazardous waste IF RECYCLED:

- **Gasoline** - is not hazardous waste if recycled. If it is not recycled, it is hazardous waste because it is toxic for benzene and it is also ignitable.
- **Contaminated shop towels, wipes and rags** - are not hazardous if commercially laundered, but are hazardous waste when contaminated by solvents or other hazardous wastes and thrown away.
- **Coolant/Antifreeze** - is not hazardous waste if recycled, but is likely to be hazardous waste because of toxic metals if not recycled. Recycling is recommended, otherwise laboratory testing is required. See Section 5.4.
- **Used oil** (including brake, transmission, power steering fluids and gear oil) - is not hazardous waste if recycled. Recycling is the easiest and the recommended method of disposal. Section 5.2 discusses used oil management. If your used oil is not recyclable due to being contaminated with hazardous waste, then it will need to be counted as hazardous waste and on Worksheet I on page 11.
- **Filters (including oil, transmission, fuel filters)** - are not hazardous waste if recycled. See Section 5.3.
- **Lead acid batteries and lead scrap** - are not hazardous waste if recycled, but are hazardous waste if not recycled because of toxic lead and cadmium, and because the liquid in a battery is corrosive. Battery dealers readily recycle batteries and other scrap lead such as wheel weights. See Section 5.1.

Worksheet II - Counting Other Recyclable Waste

These wastes are NOT defined by state law as hazardous waste IF RECYCLED.		Maximum Monthly Generation	
IF YOU DO NOT RECYCLE these, count them in your monthly generation. If you mark "Y" under "Always Recycle Y/N?" DO NOT enter a monthly amount of that material.		Always Recycle Y/N?	Lbs not recycled
1	Gasoline		x7=
2	Shop towels, wipes and rags, if contaminated by solvents or other hazardous wastes (ONLY count as waste if discarded and not commercially laundered for reuse.)		
3	Coolant/Antifreeze		x7=
4	Used oil (includes brake, transmission, power steering fluids and gear oil)		x7=
5	Filters (including oil, transmission, and fuel filters)		
6	Lead acid batteries and lead scrap		

Maximum pound generated _____

Ideally, you should be able to answer YES that you always recycle the wastes listed above, and the pounds of those wastes generated in any one month should be zero.

You will find a Hazardous Waste Calculator that can help you count your common auto repair waste streams at our web site: <http://www.dep.state.fl.us/waste/categories/hazardous/pages/AutomotiveCompliance.htm>.

***The Shortcut Method is designed ONLY for use by auto repair shops.**

**** An average conversion factor of 7 pounds/gallon is used for liquid wastes.**

2.3 DETERMINING YOUR HAZARDOUS WASTE GENERATOR STATUS

After you have completed Worksheet I and Worksheet II, you will know the maximum amount of hazardous waste your shop generates in any one month. The amount from Worksheet I determines your hazardous waste generator status. A more complicated calculation of maximum monthly hazardous waste generation may be required if you generate other wastes not listed in Worksheet I (see Appendix IV). Each generator status (category) has its own federal and state requirements. There are three categories of hazardous waste generators:

Conditionally Exempt Small Quantity Generators (CESQGs)

- ▶ generate no more than 220 pounds of hazardous waste (about half a 55-gallon drum) in a calendar month;

and

- ▶ never accumulate more than 2,200 lbs. (about five 55-gallon drums) of hazardous waste at any time.

Small Quantity Generators (SQGs)

- ▶ generate more than 220 pounds, but less than 2,200 pounds of hazardous waste in a calendar month (between about half a 55-gallon drum to 5 drums)

and

- ▶ never accumulate more than 13,200 pounds (about twenty-five 55-gallon drums) of hazardous waste at any time.

Large Quantity Generators (LQG)

- ▶ generate 2,200 pounds or more of hazardous waste per month (about 5 full drums)

or

- ▶ generate 2.2 pounds or more of an acutely toxic hazardous waste.

Note: Only a few of the wastes sometimes found in auto repair shops are acutely toxic hazardous wastes (these include sodium azide in undeployed air bags and certain solvents, such as carbon disulfide and pyridine). Auto repair shops rarely, if ever, generate as much as 2.2 lbs. of these wastes in any month.

Now, determine your shop's generator status:

If your total from Worksheet I is:

then your shop is a/an:

less than 220 lbs.



CESQG

☐

more than 220 lbs. but less than 2,200 lbs.



SQG

☐

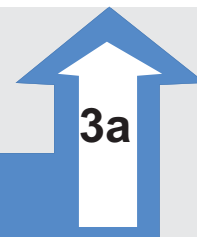
more than 2,200 lbs.



LQG

☐

COMPLIANCE QUESTION



This is your generator status. Record it in question #3a on the compliance checklist.

2.4 MIXING HAZARDOUS WASTE AND USED OIL

Auto repair shops commonly mix different fluids they believe can be disposed of as used oil, but some of these waste fluids are hazardous waste. When hazardous waste is mixed with used oil, the mixture may be considered hazardous waste that must be handled and disposed of as hazardous waste and NOT as used oil. Determining if your mixture of hazardous waste and used oil should be managed as hazardous waste is a complex process that you can avoid by not mixing other wastes with your used oil. See Section 5.2 for more information.

COMPLIANCE QUESTIONS

PART I

Does your shop mix hazardous wastes with used oil?

If NO - CESQG proceed to Chapter 3; SQG to Chapter 4.

Answer NO if you will not be mixing hazardous waste and used oil from now on.

If YES - Proceed to Part II.

4.

☐ Y ☐ N

This is the answer to question #4 on the compliance checklist

PART II

Is your mixture of hazardous waste and used oil required to be managed as hazardous waste (CESQG see box on page 24; SQG see Section 5.2, Table I, page 43)?

If YES, enter your maximum monthly amount on line 12 of Worksheet I, answer YES and proceed to Part III. If NO, CESQG proceed to Chapter 3; SQG proceed to Chapter 4.

4a.

☐ Y ☐ N

This is the answer to question #4a on the compliance checklist

PART III

Do you manage the mixture of hazardous waste and used oil as a hazardous waste? If NO, correct this violation as soon as possible and document the correction on your compliance checklist (see Section 5.2, page 43).

4b.

☐ Y ☐ N

This is the answer to question #4b on the compliance checklist

What to do next:

- ▶ If you are always a CESQG, use Chapter 3 to help fill out the checklist.
- ▶ If you are ever a SQG, use Chapter 4 to help fill out the checklist. You must have an EPA ID number--see Appendix VI.
- ▶ If you are ever a LQG, please contact your nearest FDEP district office listed on the back cover. This Workbook is not intended for LQGs. The FDEP district office will provide you with appropriate information and assistance.

Chapter 3.0 - Conditionally Exempt Small Quantity Generators' (CESQG) Requirements and BMPs - If you are a SQG, go to Chapter 4; a non-handler of hazardous waste, go to Chapter 5; if you don't know your generator status, review Chapter 2.

3.1 CESQG Container Management

COMPLIANCE QUESTION

ANSWER THIS QUESTION FIRST:

Does your shop store hazardous waste on-site prior to treatment or disposal?

YES - Complete this section

NO - Skip to Section 3.2

5.

Y N

This is the answer to question #5 on the compliance checklist

If you are not sure what materials are considered hazardous waste, please review Chapter 2 of this Workbook. If you store any hazardous waste at your shop, you must complete this section.

Because hazardous waste generated by your shop could pose a health risk to you, your employees, and your community, you must store and handle it safely.



REGULATORY REQUIREMENTS

Container Management

- ▶ Store hazardous waste in containers, such as 55-gallon drums, that are in good shape and closed to prevent releases of hazardous waste.

Accumulation

- ▶ Do not accumulate more than 2,200 lbs of hazardous waste at your shop to avoid being regulated as a SQG (about five 55-gallon drums).

BEST MANAGEMENT PRACTICES - NOT REQUIRED BUT RECOMMENDED

Container Storage and Maintenance

- ☐ Choose waste storage containers made of a material that will not react with the hazardous waste stored inside. For example, store acid wastes in plastic containers, not metal drums.
- ☐ Never place hazardous wastes that could react with each other in the same container. For example, you should never store acids (like battery acid) and bases (like alkaline rust remover) in the same container.
- ☐ Store only one type of hazardous waste per container. Do not mix different kinds of wastes. Mixing wastes can cause dangerous reactions and makes waste disposal more expensive and difficult.
- ☐ Label **each** container with the words “hazardous waste.”
- ☐ Mark **each** container with the date that you started storing hazardous waste in that container.
- ☐ Always keep container lids and bung holes closed, except when you are filling or emptying the container.
- ☐ Keep your storage containers in good shape.
- ☐ Store containers far enough apart so that you have room to inspect them thoroughly.
- ☐ Keep containers that have wastes that could react with each other separated by a physical barrier, like a dike, berm, or wall, or by a safe distance.
- ☐ Store hazardous waste containers on a surface that prevents spills and leaks to the environment. The surface should not allow any material to leak through, and it should have no cracks or gaps. The surface should also prevent spills and leaks from running over the edge onto the ground. A sealed concrete pad with a curb around it or a spill control pallet is recommended.
- ☐ Keep containers with ignitable or flammable hazardous waste at least 50 feet inside your property line. Post large “No Smoking” signs near these containers.
- ☐ Make sure your hazardous waste containers are secure, so that trespassers cannot interfere with them. Keeping containers in a locked storage area is a good way to keep intruders out. You may also want to make sure your shop is well lit at night and/or install an alarm system.
- ☐ Protect containers from weather. Do not let rainwater accumulate on the tops of drums. Store containers on a raised platform off the ground to prevent flooding.

Container Inspections and Recordkeeping

- ☐ Check all containers at least once a week to ensure that they are not leaking or rusting and that they have no bulges. You should also check to see how much waste is stored in your containers to make sure you do not exceed the 2,200 lbs (five drum) limit.
- ☐ Keep a record of the results of your weekly container inspections, including:
 - Date and time of the inspection;
 - Name of the person who inspected the containers;
 - Total number of containers;
 - Condition of the containers;
 - Any notes or observations about the containers; and
 - Date and nature of any repairs or corrective actions.
- ☐ Keep the records of your container inspections at your shop for three years.

Container Spill Control

- ☐ When you are opening, handling, or storing containers, be very careful to avoid rupturing the containers or causing them to leak or spill.
- ☐ If you have a leak or spill, you should immediately stop and contain the leak and repair or replace the container. For information on how to handle spills and leaks, see Section 3.3 of this Workbook.

Tank Management

- ☐ If you store hazardous waste in tanks, contact your FDEP district office (listed on the back cover of this Workbook) for additional tank management guidelines. As a general practice, FDEP recommends that you **do not store** hazardous waste in tanks!

COMPLIANCE QUESTIONS

Have you determined that your shop is a CESQG?

☐ Y ☐ N

If yes, proceed. If no, go back to Chapter 2 of this Workbook to determine your shop's correct generator status.

Does your shop manage containers holding hazardous waste to prevent releases, as described in this section's Regulatory Requirements?

6.

☐ Y ☐ N

This is the answer to question #6 on the compliance checklist

Does your shop comply with the hazardous waste accumulation limits (e.g. your shop does not exceed the 2,200 lbs limit)?

7.

☐ Y ☐ N

This is the answer to question #7 on the compliance checklist

If you answered NO to question 6 it is a violation. Correct it as soon as possible and document the correction on your compliance checklist. If you answered NO to question 7, your generator status will become SQG. If you reduce the amount of hazardous waste you are accumulating to less than 2,200 lbs, you will not be required to meet all SQG regulations in Chapter 4.

3.2 CESQG Employee Training

Training your employees to safely handle hazardous wastes reduces the chance they will make mistakes or cause expensive accidents or injuries at your shop. Employee training can help prevent dangerous pollution that could put you, your employees, your community, and the environment at risk. Lack of adequate training can cause repeated mistakes and lead to a dangerous and expensive disaster. Hazardous waste training should prepare your employees to manage hazardous waste and know how to respond during an emergency.



REGULATORY REQUIREMENTS

- ▶ CESQGs do not have employee training requirements for hazardous waste. Note that other types of training may be required to comply with OSHA regulations.

BEST MANAGEMENT PRACTICES - NOT REQUIRED BUT RECOMMENDED

Training

A good employee training program should teach your shop's staff how to:

- ☐ Identify hazardous waste. After being trained, your employees should:
 - Know which materials and wastes in your shop are hazardous;
 - Be able to tell when a new product or waste might be hazardous;
 - Know how to read and use Material Safety Data Sheets (MSDSs); and
 - Understand warning labels on hazardous products.
- ☐ Inspect and handle hazardous wastes. After being trained, your employees should:
 - Avoid spills (for example, by using funnels, drip pans, and absorbent materials);
 - Use equipment to protect themselves (such as gloves and respirators);
 - Keep hazardous wastes separate from one another and from other materials;
 - Store materials and wastes correctly (such as labeling waste containers and marking the date when you first put waste into an empty container); and
 - Avoid improper disposal of waste (by not dumping hazardous waste on the ground, in drains, or dumpsters; by not burning hazardous waste or letting it evaporate; and by not mixing hazardous waste with non-hazardous waste).

- ☐ Follow Emergency Response Procedures. After being trained, your employees should know how to:
 - Respond to serious spills or other accidents;
 - Respond to communications and alarm systems;
 - Contact emergency responders (fire, police, and ambulance);
 - Find emergency equipment;
 - Extinguish a small fire and know when to try to do so;
 - Contain and clean up a waste spill;
 - Follow your shop's emergency plan; and
 - Use evacuation plans and routes.
- ☐ Prevent Pollution. After being trained, your employees should:
 - Know how to reduce the amount of hazardous waste they generate by carefully managing inventories, substituting less toxic materials where possible, and recovering and recycling waste.
- ☐ **You should provide training to all new employees within six months of hiring them. You should provide refresher training every year.**

Documentation

- ☐ Keep a record of your hazardous waste training. You should record:
 - The dates and times of the training;
 - What topics the training covered;
 - Who attended the training and their job descriptions; and
 - Who provided the training.
- ☐ Keep these training records at your shop for three years.

COMPLIANCE QUESTION

Have you determined that your shop is a CESQG?

☐ Y ☐ N

If yes, proceed. If no, go back to Chapter 2 of this Workbook to determine your shop's correct generator status.

If your shop is a CESQG, you do not have to meet any regulatory requirements for employee hazardous waste training. Therefore, answer "Not Applicable" to compliance question 8.

8.

N/A

Answer "N/A" to question #8 on the compliance checklist

3.3 CESQG Spills and Leaks

If your shop generates or stores hazardous waste, you must take precautions to prevent hazardous waste spills and leaks, and you should be prepared to handle any accidents that do occur. You should maintain and operate your shop to minimize the chance of fires, explosions, and any other accidental releases of hazardous waste. Hazardous waste spills, leaks, and accidents can be very dangerous to you, your employees, your neighbors, and the environment.



REGULATORY REQUIREMENTS

Response

- ▶ If you do have a leak, spill, fire, explosion, or other accidental release of hazardous waste to the environment (whether it was sudden or gradual), you must:
 - Clean up the hazardous materials right away (for example, by immediately containing the flow of hazardous waste to the extent possible, and calling emergency responders if necessary).
- ▶ If you do have an accident that could pose a health risk or could threaten the environment (for example, if you need to call the fire department to respond to an accident) you should:
 - Call the State Warning Point at (800)320-0519 to notify them of the accident;
 - Notify the National Response Center (800)424-8802; and
 - File a report with the FDEP district office.

Notifying these contacts will help you evaluate the situation and make sure you respond appropriately. In many cases you may find that the problem you face is not a true emergency, but it is always best to call and make sure.

BEST MANAGEMENT PRACTICES - NOT REQUIRED BUT RECOMMENDED

Prevention

- ☐ Handle your hazardous waste carefully and collect all wastes in closed containers.
- ☐ Inspect damaged vehicles to be serviced for leaks.
- ☐ Confine inspection and draining of vehicles to one area.
- ☐ Plug engines and all hoses after draining.
- ☐ Place all fluids in proper storage containers immediately after draining.
- ☐ Store vehicles, parts, and cores on a surface that will contain spills and leaks.
- ☐ Use drip pans to minimize leaks.
- ☐ For more information on how to manage hazardous waste storage containers, see Section 3.1 in this Chapter.

Clean Up

- ☐ Know what type of material you are cleaning up and its characteristics (for example, if it is corrosive or flammable). Do not put corrosive waste in metal drums, and keep flammable waste away from heat and sparks.
- ☐ If the leak or spill could cause a fire or public safety hazard, call emergency responders (fire, police, or ambulance) .
- ☐ Contain the spilled waste, for example, by putting it in a clean 55-gallon drum or a plastic container, or by creating a berm with dirt or sand around the waste.
- ☐ Use rubber or latex gloves and safety glasses when you are cleaning up a spill.
- ☐ Use rags, towels, booms, sawdust, kitty litter, or lime (for battery acid) or other absorbent materials to soak up the hazardous waste.
- ☐ Use a broom, shovel, or dust pan to pick up cleanup materials.
- ☐ Keep spill control equipment and absorbent materials in a central location, accessible to all employees.
- ☐ Train all employees to quickly respond to different kinds of spills. For more information on employee training, see Section 3.2 in this chapter.

COMPLIANCE QUESTIONS

Have you determined that your shop is a CESQG?

☐ Y ☐ N

If yes, proceed. If no, go back to Chapter 2 of this Workbook to determine your shop's correct generator status.

Over the last 12 months, have your hazardous materials been on fire, exploded, or released to the environment?

IF YOU MARK "YES" GO TO QUESTION 9a, IF "NO" GO TO QUESTION 10.

9.

☐ Y ☐ N

This is the answer to question #9 on the compliance checklist

If your hazardous materials have been on fire, exploded, or released to the environment, did you clean up the hazardous materials and prevent future fires, explosions, and releases?

9a.

☐ Y ☐ N

This is the answer to question #9a on the compliance checklist

If you answered NO to question 9a, it is a violation. Correct it as soon as possible and document the correction on your compliance checklist.

3.4 CESQG Emergency Preparedness

If your shop generates or stores hazardous waste, you should minimize the potential risks from fires, explosions, or other accidents that could release hazardous waste and harm you, your employees, or your community. You should think about what might happen in a worst case scenario, and then plan for what you and your employees would do in that case. The simplest way to do this is to ask yourself a series of “what if” questions, such as, “What if there were a fire in our hazardous waste storage area?” or “What if our pallet of batteries were knocked over?”

REGULATORY REQUIREMENTS

- ▶ CESQGs do not have to meet any specific regulatory requirements for emergency preparedness.

BEST MANAGEMENT PRACTICES - NOT REQUIRED BUT RECOMMENDED

Equipment

- ☐ The following equipment will help your shop be prepared for an emergency:
 - An internal communication or alarm system to immediately alert all employees if an emergency occurs (for example, a fire alarm or an intercom system);
 - A telephone or similar communication device (such as a hand-held two-way radio) to call for help;
 - Fire extinguishers;
 - Materials to control a hazardous waste spill (such as spill absorbents, overpack drums, and extra 55-gallon drums); and
 - Decontamination supplies (such as neutralizing agents like lime).
- ☐ Post a list next to the telephone or radio with the phone number for the fire department and the person in your shop who is responsible for responding to emergencies. Also list the location of all fire extinguishers, spill control materials, and the fire alarm.
- ☐ Make sure you have enough water at sufficient pressure to supply fire hoses, sprinklers, or spray systems; or have foam producing equipment to control fires.
- ☐ Maintain your shop's emergency equipment and test it periodically to make sure everything is in working order.
- ☐ Keep enough aisle space in all work areas to allow people to get out in case of an emergency, and make sure there is enough room to move emergency equipment.

Planning

- ☐ Develop a written plan for how to prevent and respond to emergencies that includes:
 - How you will maintain and operate your shop to minimize the possibility of fire, explosion or any other unplanned release of hazardous waste;
 - The name and contact information for the emergency coordinator responsible for responding to accidents;
 - Fire, spill, and explosion response procedures;
 - What emergency equipment is in place at your shop;
 - Evacuation plan, signals and routes; and
 - Arrangements you have made with local authorities (for example, fire departments and hospitals) to prepare for any emergencies.

- ☐ Share your emergency plan with your local fire department, hospitals and your employees.
- ☐ Be sure to teach your employees about the emergency plan during their hazardous waste training (see Section 3.2 of this Workbook).

The sample emergency plan and forms in Appendix V will help you prepare an emergency plan.

Notification

- ☐ Before any accidents occur, contact your local police and fire departments, as well as state emergency response teams and local hospitals, to let them know what types of hazardous waste you handle at your shop. This way, if an accident does occur, they will be prepared and will know how best to respond. The sample letter in Appendix V provides an example of how to contact your local authorities.

Complete the forms found in Appendix V and post them next to your telephone. Make sure your employees are familiar with these forms and the information they contain.

COMPLIANCE QUESTIONS

Have you determined that your shop is a CESQG?

☐ Y ☐ N

If yes, proceed. If no, go back to Chapter 2 of this Workbook to determine your shop's correct generator status.

If your shop is a CESQG, you do not have to meet any regulatory requirements for safety or decontamination equipment. Therefore, answer "Not Applicable" to compliance question 10.

10.

N/A

Answer "N/A" to question #10 on the compliance checklist

If your shop is a CESQG, you do not have to meet any regulatory requirements for posting emergency information near the telephone. Therefore, answer "Not Applicable" to compliance question 11.

11.

N/A

Answer "N/A" to question #11 on the compliance checklist

3.5 CESQG Waste Disposal and Documentation

Improperly disposing of hazardous waste can cause serious health risks for you, your employees, your community, and the environment. You must ensure safe transport and proper management of all hazardous waste your shop generates.



REGULATORY REQUIREMENTS

Disposal

- ▶ Dispose of hazardous waste in one of the following ways:
 - Ship your hazardous waste to an **authorized** hazardous waste recycling, treatment, storage or disposal facility.
 - Take your waste to a household hazardous waste collection site that is authorized by FDEP and is willing to accept your waste.
 - ▶ Do not dispose of your hazardous waste in a solid waste landfill, municipal waste incinerator, or in a dumpster.
 - ▶ Do not dispose of your hazardous waste at your shop, for example, by flushing it into the septic tank, down the storm drain, into a stream, or on the ground.
 - ▶ Do not treat your hazardous waste at your shop, for example, by burning it or allowing it to evaporate into the air.
- ▶ Because your shop is a CESQG, you may mix your hazardous waste with your shop's used oil, but only if the used oil mixture will be burned for energy recovery, and only if the resulting mixture contains less than 1,000 parts per million (ppm) of total chlorinated compounds. Perchloroethylene or "perc" in brake cleaner is the chlorinated compound most commonly used by auto repair shops ("chloro" tells you it contains chlorine). Your used oil hauler has an instrument ("sniffer") that can detect the level of chlorinated compounds. A small amount of chlorinated solvent in used oil will usually cause more than 1,000 ppm total chlorinated compounds. Any mixture of hazardous waste and used oil that contains more than 1,000 ppm total chlorinated compounds must be managed as hazardous waste. See Sections 2.4, 5.2 and Appendix IVB in this Workbook for more details.

Documentation

- ▶ Keep records of how you disposed of your hazardous waste for at least 3 years. Adequate records include hazardous waste manifests, reclamation agreements, or any written record that describes the waste and how much was disposed, where it was disposed, and when it was disposed.
- ▶ Keep waste analysis, lab results, or other hazardous waste determination records.

BEST MANAGEMENT PRACTICES - NOT REQUIRED BUT RECOMMENDED**Disposal**

- ☐ Select a hazardous waste transporter that is registered with FDEP. For help finding a transporter, call the FDEP's Hazardous Waste Regulation Section, at 850-245-8707 or visit our web site at: http://www.dep.state.fl.us/waste/quick_topics/database_reports/default.htm.
- ☐ For help finding a recycling, treatment, storage, or disposal facility that is authorized to receive your waste, call FDEP's Hazardous Waste Regulation Section at 850-245-8707, call your FDEP District office at the number shown on the back of this publication, or check with business colleagues or industry trade associations to help you choose an appropriate company to handle your waste.
- ☐ Before mixing your shop's hazardous waste with your used oil, discuss this disposal method with your used oil transporter and processor to make sure that they agree with this approach.
- ☐ Never mix brake cleaner or carburetor cleaner with your used oil. These hazardous materials may contain chlorinated solvents. If you mix these materials with used oil, the resulting mixture could exceed the 1,000 parts per million of total chlorinated compounds, which would make the entire mixture a hazardous waste, and your used oil transporter would reject the batch of mixed oil.
- ☐ A good waste management practice is to make at least annual shipments of your hazardous waste to an appropriate facility.

Documentation

- ☐ Prepare a hazardous waste manifest for all hazardous waste that is shipped off-site by a registered hazardous waste transporter. Complete all parts of the manifest. Keep returned copies of hazardous waste manifests with the signature of the person who accepted the waste at the recycling, treatment or disposal facility. This returned copy of the manifest shows that your hazardous materials were properly delivered. Keep your records organized.

OR

- ☐ If your hazardous waste is recycled, and if you and your licensed hazardous waste recycler have a reclamation agreement, keep a copy of the agreement in your records.

COMPLIANCE QUESTIONS

Have you determined that your shop is a CESQG?

☐ Y ☐ N

If yes, proceed. If no, go back to Chapter 2 of this Workbook to determine your shop's correct generator status.

Is your shop properly disposing of all of its hazardous wastes to facilities authorized to accept the waste and properly documenting its disposal as described in the Disposal and Documentation parts of this section's Regulatory Requirements ?

12.

☐ Y ☐ N

This is the answer to question #12 on the compliance checklist

Does your shop dispose of or treat hazardous waste on-site in any of the following ways by:

- ▶ Sending it to a septic tank;
- ▶ Pouring it in a storm drain;
- ▶ Pouring it in surface water such as a lake or stream;
- ▶ Pouring it on or burying it in the ground;
- ▶ Burning;
- ▶ Putting it in a dumpster; or
- ▶ Letting it evaporate?

13.

☐ Y ☐ N

This is the answer to question #13 on the compliance checklist

If you answered NO to question 12, or YES to question 13, it is a violation. Correct it as soon as possible and document the correction on your compliance checklist.

IF YOU ARE A CESQG -

After completing question 13 above on the compliance checklist, skip to Section 5.1 of this Workbook, Waste Batteries, on page 41.

Chapter 4.0 - Small Quantity Generators' (SQG) Requirements and BMPs - If you are a CESQG, go to Chapter 3; a non-handler of hazardous waste, go to Chapter 5; if you don't know your generator status, review Chapter 2.

4.1 SQG Container Management

COMPLIANCE QUESTION

ANSWER THIS QUESTION FIRST:

Does your shop store hazardous waste on-site prior to treatment or disposal?

YES - Complete this section

NO - Skip to Section 4.2

5.

☐ Y ☐ N

This is the answer to question #5 on the compliance checklist

If you are not sure what materials are considered hazardous waste, please review Chapter 2 of this Workbook. If you store any hazardous waste at your shop you must complete this section.

Because hazardous waste generated by your shop could pose a health risk to you, your employees, and your community, you must make sure that the hazardous waste stored at your shop is handled and stored safely.



REGULATORY REQUIREMENTS

Container Storage and Maintenance

- ▶ Store all hazardous waste in containers, such as 55-gallon drums.
- ▶ Always keep container lids and bung holes closed, except when you are actively filling or emptying a container.
- ▶ Keep your storage containers in good shape so that they will not leak, rust, or bulge.
- ▶ When you are opening, handling, or storing containers, avoid rupturing the containers or causing them to leak or spill.
- ▶ Choose waste storage containers made of or lined with a material that will not react with the hazardous waste stored inside. For example, store corrosive wastes in plastic containers, not metal drums.
- ▶ Keep containers that have wastes that could react with each other separated by a physical barrier, like a dike, berm, or wall, or by a safe distance.
- ▶ Never place hazardous wastes that could react with each other in the same container. For example, you should never store acids (like battery acid) and bases (like alkaline rust remover) in the same container.

REGULATORY REQUIREMENTS - CONTINUED

- ▶ Label each container with the words "hazardous waste."
- ▶ Mark each container with the date that you started storing hazardous waste in that container.
- ▶ If you have a leak or spill, you must immediately stop and contain the leak and repair or replace the container. For information on how to handle spills and leaks, see Section 4.3 of this Workbook.

Container Inspections and Recordkeeping

- ▶ You must check all containers at least once a week to ensure that they are not corroded, leaking, or rusting, and that they have no bulges. You should also check to see how much waste is stored in your containers, to make sure you do not exceed the 13,200 lbs limit.
- ▶ Keep a record of the results of your weekly container inspections, including:
 - Date and time of the inspection;
 - Name of the person who inspected the containers;
 - Total number of containers;
 - Condition of the containers;
 - Any notes or observations about the containers; and
 - Date and nature of any repairs or corrective actions.
- ▶ Keep the records of your container inspections at your shop for three years.
- ▶ Store containers far enough apart so that you have room to inspect them thoroughly.

Waste Accumulation

- ▶ Do not accumulate more than 13,200 lbs (or about 25 drums) of hazardous waste at your shop at one time.
- ▶ Do not store hazardous wastes at your shop for more than 180 days.
- ▶ If you generate small amounts of hazardous waste throughout your shop, you may store these wastes in satellite accumulation areas (SAA) located close to where you generated the waste. You may store up to 55 gallons of waste at a SAA. Once you reach the 55-gallon limit, you have 3 days to transfer the waste to your usual hazardous waste storage containers. (Note: You may only accumulate up to one quart of acutely hazardous wastes in the SAA. Acutely hazardous wastes that auto repair shops may generate include sodium azide from non-deployed air bags and certain solvents, such as carbon disulfide and pyridine.)

Tank Management

- ▶ If you store hazardous waste in tanks, contact your FDEP district office (listed on the back cover of this Workbook) for additional tank management guidelines. As a general practice, FDEP recommends that you **do not store** hazardous waste in tanks!

BEST MANAGEMENT PRACTICES - NOT REQUIRED BUT RECOMMENDED

Container Management

- ☐ Store only one kind of hazardous waste per container. Do not mix different kinds of wastes. Mixing wastes can cause dangerous reactions and makes waste disposal more expensive and difficult. Do not store hazardous waste in tanks.
- ☐ Store hazardous waste containers on a surface that prevents spills and leaks to the environment. The surface should not allow any material to leak through, and it should have no cracks or gaps. The surface should also prevent spills and leaks from running over the edge onto the ground. A surface sealed concrete pad with a curb around it or a spill control pallet is recommended.
- ☐ Keep containers with ignitable or flammable hazardous waste at least 50 feet inside your property line. Post large "No Smoking" signs near these containers.
- ☐ Make sure your hazardous waste containers are secure, so that trespassers cannot interfere with them. Keeping containers in a locked storage area is a good way to keep intruders out. You may also want to make sure your shop is well lit at night and/or install an alarm system.
- ☐ Protect containers from weather. Do not let rainwater accumulate on the tops of drums. Store containers on a raised platform off the ground to prevent flooding.

COMPLIANCE QUESTIONS

Have you determined that your shop is a SQG?

If yes, proceed. If no, go back to Chapter 2 of this Workbook to determine your shop's correct generator status.

☐ Y ☐ N

Does your shop manage all containers holding hazardous waste to prevent releases, as described in the Container Storage and Maintenance part and in the Container Inspection and Recordkeeping part of this section's Regulatory Requirements?

6.

☐ Y ☐ N

This is the answer to question #6 on the compliance checklist

Does your shop comply with the hazardous waste accumulation limits, as described in the Waste Accumulation part of this section's Regulatory Requirements?

7.

☐ Y ☐ N

This is the answer to question #7 on the compliance checklist

If you answered NO to either question 6 or 7, it is a violation. Correct it as soon as possible and document the correction on your compliance checklist.

4.2 SQG Employee Training

Training your employees to safely handle hazardous wastes reduces the chance that your employees will make mistakes or cause expensive accidents or injuries at your shop. Employee training can help prevent dangerous pollution that could put you, your employees, your community, and the environment at risk. Lack of adequate training can cause repeated mistakes, and could lead to a dangerous and expensive disaster. Hazardous waste training should prepare your employees to manage hazardous waste and to know how to respond in case of an emergency.



REGULATORY REQUIREMENTS

Routine Hazardous Waste Handling

- ▶ You must train your employees in how to properly handle hazardous waste that they may generate in their normal job duties, including the chemical and physical characteristics of the hazardous wastes they handle.

Emergency Preparedness

- ▶ You must train your employees in what to do during an emergency, including:
 - How to respond to serious spills or other accidents;
 - How to respond to communication and alarm systems;
 - How to contact emergency responders (fire, police, and ambulance);
 - Where to find emergency equipment;
 - Be able to use evacuation plans and routes;
 - How to extinguish a fire and know when to try to do so;
 - How to contain and clean up a spill;
 - Who to inform if an emergency occurs; and
 - How to follow your shop's emergency plan.

Note: This section does not address any other OSHA training requirements that may apply to your shop.

BEST MANAGEMENT PRACTICES - NOT REQUIRED BUT RECOMMENDED

Training

In addition to meeting the regulatory requirements listed above, a good employee training program should teach your shop's staff how to:

- ☐ Identify hazardous wastes. After being trained, your employees should:
 - Know which materials and wastes in your shop are hazardous;
 - Be able to tell when a new product or waste might be hazardous;
 - Know how to read and use Material Safety Data Sheets (MSDSs); and
 - Understand warning labels on hazardous products.
- ☐ Inspect and handle hazardous wastes. After being trained, your employees should:
 - Avoid spills (for example, by using funnels, drip pans, and absorbents);
 - Use equipment to protect themselves (such as gloves and respirators);
 - Keep hazardous waste and materials separate from one another and from other materials;
 - Store materials and wastes correctly (such as labeling waste containers and marking the date when you first put waste into an empty container); and
 - Avoid improper disposal of waste (by not dumping hazardous waste on the ground, in drains, or dumpsters; by not burning hazardous waste or letting it evaporate; and by not mixing hazardous waste with non-hazardous waste).
- ☐ Follow Emergency Response Procedures. After being trained, your employees should:
 - Know how to give basic first aid.
- ☐ Prevent Pollution. After being trained, your employees should:
 - Know how to reduce the amount of hazardous waste they generate by carefully managing inventories, substituting less toxic materials, where possible, and recovering and recycling waste materials.

You should provide training to all new employees within six months of hiring them. You should provide refresher training every year.

Documentation

- ☐ Keep a record of your hazardous waste training. You should record:
 - The dates and times of the training;
 - What topics the training covered;
 - Who attended the training and their job descriptions; and
 - Who provided the training.
- ☐ Keep these training records at your shop for three years.

COMPLIANCE QUESTION

Have you determined that your shop is a SQG?

☐ Y ☐ N

If yes, proceed. If no, go back to Chapter 2 of this Workbook to determine your shop's correct generator status.

8a. Does your shop's hazardous waste training teach employees how to properly handle hazardous waste that they may generate in their normal job duties, as described in Routine Hazardous Waste Handling, of this section's Regulatory Requirements?

☐ Y ☐ N

8b. Does your shop's hazardous waste training teach employees what to do in case of an emergency as described in Emergency Preparedness, of this section's Regulatory Requirements?

☐ Y ☐ N

Have your shop's employees received adequate hazardous waste training according to the requirements for SQGs?

- ▶ To mark "YES" you must answer "YES" to the questions 8a and 8b above.

8.

☐ Y ☐ N

This is the answer to question #8 on the compliance checklist

If you answered NO to question 8, it is a violation. Correct it as soon as possible and document the correction on your compliance checklist.



4.3 SQG Spills and Leaks

If your shop generates or stores hazardous waste, you must take precautions to prevent hazardous waste spills and leaks, and you should be prepared to handle any accidents that do occur. You are required to maintain and operate your shop to minimize the chance of fires, explosions, and any other accidental releases of hazardous waste. Hazardous waste spills, leaks, and accidents can be very dangerous to you, your employees, your neighbors, and the environment.



Poor Maintenance

REGULATORY REQUIREMENTS

Prevention

- ▶ You are required to maintain and operate your shop to minimize the chance of fires, explosions, and any other accidental releases of hazardous waste, including sudden and gradual releases, that could contaminate the environment or threaten human health.

Response

- ▶ If you do have a leak, spill, fire, explosion, or other accidental release of hazardous waste to the environment (whether it was sudden or gradual), you must:
 - Clean up the hazardous materials right away (for example, by immediately containing the flow of hazardous waste to the extent possible) and manage the clean-up materials as hazardous waste.
 - Prevent future fires, explosions, and releases (for example, by improving the way your shop handles and stores hazardous waste and updating your employee hazardous waste training).

Notification

- ▶ If you have an accident that could pose a health risk or could threaten the environment (for example, if you need to call the fire department to respond to an accident) you should:
 - Call the State Warning Point at (800)320-0519 to notify them of the accident;
 - Notify the National Response Center (800)424-8802; and
 - File a report with the FDEP district office.

Notifying these contacts will help you evaluate the situation and make sure you respond appropriately. In many cases you may find that the problem you face is not a true emergency, but it is always best to call and make sure.

BEST MANAGEMENT PRACTICES - NOT REQUIRED BUT RECOMMENDED

Prevention

- ☐ Inspect damaged vehicles to be serviced for leaks.
- ☐ Confine inspection and draining of vehicles to one area.
- ☐ Plug engines and all hoses after draining.
- ☐ Place all fluids in proper storage containers immediately after draining.

- ☐ Store vehicles, parts, and cores on a surface that will contain spills and leaks.
- ☐ Use drip pans to minimize leaks.
- ☐ Store all used absorbents from non-hazardous waste spills in closed, covered leak-proof containers. Dispose of used absorbents properly.
- ☐ Store all waste fluids in closed containers to prevent spills. Close containers tightly to prevent evaporation.

Clean Up

- ☐ Know what type of material you are cleaning up and its characteristics (for example, if it is corrosive or flammable). Do not put corrosive waste in metal drums, and keep flammable waste away from heat and sparks.
- ☐ If the leak or spill could cause a fire or public safety hazard, call emergency responders (fire, police, or ambulance) and the local health department.
- ☐ Avoid touching hazardous waste or breathing any fumes.
- ☐ Contain the spilled waste, for example, by putting it in a clean 55-gallon drum or a plastic container, or by creating a berm with dirt or sand around the waste.
- ☐ Use rubber or latex gloves and safety glasses when you are cleaning up a spill.
- ☐ Use rags, towels, pads, booms, sawdust, kitty litter, or lime (for battery acid) or other absorbent materials to soak up the hazardous waste.
- ☐ Use a broom, shovel, or dust pan to pick up cleanup materials.
- ☐ Keep spill control equipment and absorbent materials in a central location, accessible to all employees.
- ☐ Train all employees to quickly respond to different kinds of spills.
- ☐ For more information on employee training, see Section 4.2 in this Chapter.

COMPLIANCE QUESTIONS

Have you determined that your shop is a SQG?

☐ Y ☐ N

If yes, proceed. If no, go back to Chapter 2 of this Workbook to determine your shop's correct generator status.

Over the last 12 months, have your hazardous materials been on fire, exploded, or released to the environment?

9.

☐ Y ☐ N

This is the answer to question #9 on the compliance checklist

If your hazardous materials have been on fire, exploded, or released to the environment, did you clean up the hazardous materials and prevent future fires, explosions, and releases, as described in the Response part of this section's Regulatory Requirements?

9a.

☐ Y ☐ N

This is the answer to question #9a on the compliance checklist

If you answered YES to question 9 and NO to question 9a, it is a violation. Correct it as soon as possible and document the correction on your compliance checklist.

4.4 SQG Emergency Preparedness

If your shop generates or stores hazardous waste, you should minimize the potential risks from fires, explosions, or other accidents that could release hazardous waste and harm you, your employees, or your community. You should think about what might happen in a worst case scenario, and then plan for what you and your employees would do in that case. The simplest way to do this is to ask yourself a series of “what if” questions, such as, “What if there were a fire in our hazardous waste storage area?” or “What if our pallet of batteries were knocked over?”



REGULATORY REQUIREMENTS

Safety and Decontamination Equipment

- ▶ Your shop must have all of the following safety and decontamination equipment:
 - An internal communication or alarm system to immediately alert all employees if an emergency occurs (for example, a fire alarm or an intercom system);
 - A telephone or similar communication device (such as a hand-held two-way radio) to call for help;
 - Fire extinguishers;
 - Materials to control a hazardous waste spill (such as spill absorbents, overpack drums, and extra 55-gallon drums);
 - Decontamination supplies (such as neutralizing agents like lime); and
 - Water at sufficient pressure to supply fire hoses, sprinklers, or spray systems; or foam-producing equipment to control fires.

Posted Emergency Information

Your shop must have a list posted near the telephone with all of the following information:

- The name and phone number of the emergency coordinator (the employee responsible for responding to emergencies who is on call at all times);
- The location of fire extinguishers and spill control materials; and
- The phone number for the fire department.

Planning

Before any accidents occur, contact your local police and fire departments, as well as emergency response teams and local hospitals, to let them know what types of hazardous waste you handle at your shop. This way, if an accident does occur, they will be prepared and will know how best to respond.

REGULATORY REQUIREMENTS - CONTINUED**Equipment**

- ▶ Maintain your shop's emergency equipment and test it periodically to make sure everything is in working order.
- ▶ Keep enough aisle space in all work areas to allow people to get out in case of an emergency, and make sure there is enough room to move emergency equipment.

Appendix V contains samples and forms you can use for Emergency Response Information, Emergency Response Procedures, Emergency Plan, and Letter to Local Authorities.

BEST MANAGEMENT PRACTICES - NOT REQUIRED BUT RECOMMENDED

While not required, the following guidelines will help your shop be better prepared in case of an emergency:

Planning

- ☐ Develop a written plan for how to prevent and respond to emergencies that includes:
 - How you will maintain and operate your shop to minimize the possibility of fire, explosion or any other unplanned release of hazardous waste;
 - The name and contact information for the emergency coordinator responsible for responding to accidents;
 - Fire, spill, and explosion response procedures;
 - What emergency equipment is in place at your shop;
 - Evacuation plan, signals and routes; and
 - Arrangements you have made with local authorities (for example, fire and health departments) to prepare for any emergencies.
- ☐ Share your emergency plan with your local fire and health departments and your employees. Be sure to teach your employees about the emergency plan during their hazardous waste training (see Section 4.2 of this Workbook).

COMPLIANCE QUESTIONS

Have you determined that your shop is a SQG?

☐ Y ☐ N

If yes, proceed. If no, go back to Chapter 2 of this Workbook to determine your shop's correct generator status.

Does your shop have required safety and decontamination equipment as described in the Regulatory Requirements for this section?

10.☐ Y ☐ N

This is the answer to question #10 on the compliance checklist

Does your shop have a list posted near the telephone with all emergency information as described in the Regulatory Requirements for this section?

11.☐ Y ☐ N

This is the answer to question #11 on the compliance checklist

If you answered NO to either question 10 or 11, it is a violation. Correct it as soon as possible and document the correction on your compliance checklist.

4.5 SQG Waste Disposal and Documentation

Improperly disposing of hazardous waste can cause serious health risks for you, your employees, your community, and the environment. You must ensure safe transport and proper management of all hazardous waste your shop generates.



REGULATORY REQUIREMENTS

Disposal

- ▶ Never attempt to transport your own hazardous waste to another location.
- ▶ Ship your hazardous waste only to a **permitted** hazardous waste treatment, storage or disposal facility, or a legitimate recycler.
- ▶ Select a hazardous waste transporter that has registered with FDEP to be sure that they have the proper liability insurance coverage. For verification call FDEP's Hazardous Waste Regulation Section at 850-245-8707 or visit our web site at: http://www.dep.state.fl.us/waste/quick_topics/database_reports/default.htm.
- ▶ Do not dispose of your hazardous waste in a solid waste landfill, incinerator or dumpster.
- ▶ Avoid mixing your hazardous waste with used oil. See Section 2.4 and Section 5.2 of this Workbook for more details.
- ▶ Do not dispose of your hazardous waste at your shop; for example, by flushing it into the septic tank, down the storm drain, into a stream, or on the ground.
- ▶ Do not treat your hazardous waste at your shop by burning it or allowing it to evaporate into the air.
- ▶ Prepare a hazardous waste manifest for all hazardous waste that is shipped off-site, and use only a registered hazardous waste transporter. Fill in all parts of the manifest.
- ▶ If your hazardous waste is recycled, and if you and your hazardous waste recycler have a reclamation agreement, you do not have to prepare a hazardous waste manifest.
 - A reclamation agreement is a written agreement with a recycler to collect and reclaim a specified hazardous waste and to deliver regenerated material back to you on a specific schedule.
 - The recycler must own and operate the vehicle used to transport the waste and regenerated material.

- ▶ Land disposal of any hazardous waste (for example, by putting hazardous waste in a landfill) is prohibited unless the hazardous waste has been treated to meet federal standards.
 - You must send a one-time signed notification to the permitted hazardous waste disposal facility receiving your waste telling that facility whether or not your waste meets the land disposal standards.
 - Attach the signed notification to the hazardous waste manifest or shipping document.

Documentation

- ▶ Obtain and use an EPA ID number (see Appendix VI).
- ▶ Keep returned copies of hazardous waste manifests with the signature of the person who accepted the waste at the recycling, treatment or disposal facility. This returned copy of the manifest shows that your hazardous materials were properly delivered.
 - If you do not receive a signed, returned copy of a hazardous waste manifest within 60 days of sending out a hazardous waste shipment, send a copy of the original hazardous waste manifest, along with an exception report that describes the situation, to the FDEP.
- ▶ Keep all hazardous waste manifests, land disposal documents and recycling contracts or records for at least three years.
- ▶ Keep waste analysis, lab results, or other hazardous waste determination records for at least three years.

BEST MANAGEMENT PRACTICES - NOT REQUIRED BUT RECOMMENDED

Disposal

- ☐ For help finding a hazardous waste transporter, a permitted hazardous waste treatment, storage or disposal facility, or a legitimate recycler that can handle your hazardous waste, call the FDEP's Hazardous Waste Regulation Section at 850-245-8707 or call your FDEP District office at the number shown on the back of this publication.
- ☐ When selecting a hauler or recycling, treatment or disposal facility, check with business colleagues or industry trade associations help you choose an appropriate company to handle your waste.

Documentation

- ☐ Manifest, reclamation agreement, land disposal notification, and waste determination records should be organized in files to allow easy tracking of transporter shipments and delivery to the designated hazardous waste facility.

COMPLIANCE QUESTIONS

Have you determined that your shop is a SQG?

☐ Y ☐ N

If yes, proceed. If no, go back to Chapter 2 of this Workbook to determine your shop's correct generator status.

Is your shop properly disposing of all of its hazardous wastes to facilities authorized to accept the waste and properly documenting its disposal as described in the Disposal and Documentation parts of this section's Regulatory Requirements?

12.☐ Y ☐ N

This is the answer to question #12 on the compliance checklist

Does your shop dispose of or treat hazardous waste on-site in any of the following ways, by:

- ▶ Sending it to a septic tank;
- ▶ Pouring it in a storm drain;
- ▶ Pouring it in surface water such as a lake or stream;
- ▶ Pouring it on or burying it in the ground;
- ▶ Burning;
- ▶ Putting it in a dumpster; or
- ▶ Letting it evaporate?

13.☐ Y ☐ N

This is the answer to question #13 on the compliance checklist

If you answered NO to question 12, or YES to question 13, it is a violation. Correct it as soon as possible and document the correction on your compliance checklist.

Chapter 5.0 - Requirements and BMPs for Common Auto Repair Shop Wastes

5.1 Waste Batteries

Automobile batteries are dangerous because they contain lead and acid which can harm people and the environment. Waste batteries are considered hazardous waste if they are not recharged, recycled or returned to the manufacturer.

Always handle and store batteries in a way that they will not get damaged or wet, and so that acid will not leak out. Check batteries for leaks and cracks before storing.



COMPLIANCE QUESTION

ANSWER THIS QUESTION FIRST:

Does your shop generate waste car batteries?

YES - Complete this section

NO - Skip to Section 5.2

14.

☐ Y ☐ N

This is the answer to question #14 on the compliance checklist

REGULATORY REQUIREMENTS

Handling Spills and Leaks

- ▶ Prevent spills or leaks onto the ground or into the water.
 - If a battery does spill or leak, **stop the leak and clean up the spill.**
 - Stop the source of the leak or spill. Prevent spilled material from spreading.
 - Place the broken, cracked, or leaking battery in a closed, watertight, acid resistant storage container. Never assume a broken battery is completely dry, even if you think there is no more acid inside.
 - Neutralize the acid with baking soda or lime. Soak up neutralized acid with a clean dry rag, absorbent, or kitty litter.
 - Dispose of clean-up material in a labeled, acid-resistant, covered storage container.
 - Have used clean-up material collected by an authorized hazardous waste hauler.

Disposal

- ▶ It is illegal to bury batteries, throw them in the garbage, or dump them into waterways.
- ▶ If you are not recharging, recycling, or returning your old car batteries to a manufacturer, you must send them to a facility authorized to manage waste batteries.

Documentation

- ▶ Keep your battery recycling or disposal receipts for at least 3 years, and know who takes them to be recycled or disposed.

For more information on battery management contact:

- ▶ FDEP's Hazardous Waste Management Section at 850-245-8759
- ▶ CCAR GreenLink – (888) GRN-LINK (476-5465)

BEST MANAGEMENT PRACTICES - NOT REQUIRED BUT RECOMMENDED**Pollution Prevention**

- ☐ If you aren't already, consider recharging and reselling those used batteries that are still rechargeable.
- ☐ Recycle batteries that are not rechargeable. Up to 97% of a car battery is recyclable.

Training

- ☐ Train your employees to follow the regulatory requirements and best management practices described in this section.

COMPLIANCE QUESTIONS

15a. If your waste batteries are recycled, do you keep records of your recycled waste batteries for three years?

☐ Y ☐ N

15b. If the batteries are not recycled, do you send them to a facility authorized to manage waste batteries and do you keep your battery disposal records for three years?

☐ Y ☐ N

15c. When batteries in your shop show signs of leaking or damage, do you place them in a container to prevent the acid from spreading?

☐ Y ☐ N

15d. If batteries in your shop leaked into the ground or water within the last 12 months, did you, or someone at your shop, do all of the following?

☐ Y ☐ N

- ☐ Prevent the spilled material from spreading;
- ☐ Neutralize the acid with baking soda or lime;
- ☐ Soak up neutralized acid with a clean dry rag, with absorbent, or with kitty litter;
- ☐ Dispose of material used to soak up neutralized acid in a labeled, covered, acid-resistant storage container; and
- ☐ Have material collected by an authorized hazardous waste hauler.

Does your shop comply with all requirements for waste batteries?
To mark "YES" you must answer "YES" to either question 15a or 15b
AND answer "YES" to questions 15c and 15d above.

15.
☐ Y ☐ N

This is the answer
to question #15 on
the compliance
checklist

If you answered "NO" to question 15, it is a violation. Correct it as soon as possible and document the correction on your compliance checklist.

5.2 Used Oil and Other Fluids

COMPLIANCE QUESTION

ANSWER THIS QUESTION FIRST:

Does your shop generate used oil and/or used oil filters?

YES - Complete this section and Section 5.3

NO - Skip to Section 5.4

16.

☐ Y ☐ N

This is the answer to question #16 on the compliance checklist

Automotive fluids become contaminated (typically with lead or benzene) when additives break down, or the oil picks up metals from engine wear, or from sloppiness during fluid changes. Contaminated used oil can endanger the health of workers, the community and the environment.



Recycling is the simplest and preferred method to manage used motor oil and auto fluids. If your shop is not recycling used oil, manage it as hazardous waste unless lab testing can demonstrate that it is not ignitable or toxic.

Avoid mixing hazardous waste or other shop waste with your used oil. Mixing may contaminate the used oil, making recycling more expensive and/or causing the entire mixture to be regulated as hazardous waste.

REGULATORY REQUIREMENTS

Handling

- ▶ If you mix hazardous waste and used oil, you must determine whether it is required to be managed as a hazardous waste. (See Table I). You may use Table I or the longer, more complete method in Appendix IV and Appendix IVB.

Table I A. Can be mixed with used oil and it is not Hazardous Waste	B. Need transporter's permission to mix with used oil	C. Do not mix with used oil or you must manage it as Hazardous Waste
Cutting Oil (without chlorinated compounds) Lubricating Oil Gear Oil Brake Fluid Motor Oil Hydraulic Oil Differential Oil Power Steering Fluid Transaxle Fluid Transmission Fluid	Gasoline & Diesel Fuel Mineral Spirits Coolant/Antifreeze (To give permission, your oil transporter must know that the recycler will separate oil and coolant and will recycle both.)	Air Conditioning Compressor Oils Chlorinated Solvents Brake Cleaner Carburetor Cleaner Solvent Degreasers (check labeling or MSDSs for the solvents you use to see if they contain chlorine) Carburetor (Immersion) Cleaner Paint and Paint Thinners Sludges and Still Bottoms

REGULATORY REQUIREMENTS - CONTINUED

Storage

- ▶ Label all containers with the words "Used Oil."
- ▶ All containers must be in good condition with no visible leaks.
- ▶ All used oil containers and tanks stored outside of a structure must be closed, covered, or otherwise protected from the weather.
- ▶ If used oil storage containers or tanks are not double-walled, they must be stored on an oil-impermeable surface with engineered secondary containment that has the capacity to hold 110% of the volume of the largest container or tank.

Note: Containers that are 55-gallons or less stored inside a structure on an oil-impermeable floor will meet this requirement if any leaks would remain in the structure.

Spill Control

- ▶ If a leak or spill occurs:
 - Stop the leak;
 - Contain the spilled material;
 - Clean up the spilled material using kitty litter, shop rags or another absorbent; and
 - Repair or replace the storage container as necessary.

Documentation

- ▶ Keep receipts from your used oil hauler to demonstrate that your used oil and other auto fluids have been properly handled. If you self-transport, you will need to provide equivalent records.
- ▶ If you have a "tolling arrangement" (see Transport, below, for more information), you should keep a copy of your contract at your shop.

Disposal

- ▶ DO NOT dispose of used oil or auto fluids in a septic tank, dumpster, storm drain, on the ground, in the water, at a landfill, or by open burning. DO NOT use used oil to control weeds or insect pests or to oil roads for dust control. IT IS ILLEGAL TO DO SO.
- ▶ You are allowed to transport less than 55 gallons at a time of your own oil if you are transporting it to a used oil transporter or processor who has an EPA ID number and is registered with FDEP or an aggregation point you own or operate.
- ▶ You may:
 - Recycle your used oil and other automotive fluids that may be mixed with used oil (See Table 1). Used oil may be recycled by recovery and rerefining by a state permitted used oil processor; or
 - Store and dispose of used oil and other automotive fluids as regulated hazardous waste, as described in Chapter 3 (CESQG) or Chapter 4 (SQG); or
 - Burn your used oil, BUT ONLY in a space heater that operates at less than 500,000 BTUs per hour and is vented to the outside.

Transport

- ▶ To recycle used oil, use a used oil transporter who has an EPA ID number and is registered with FDEP; or
- ▶ You may use a transporter without an EPA ID number if your used oil is reclaimed and returned to you for use as a lubricant, cutting oil, or coolant, under contract. The contract, or "tolling arrangement," must specify:
 - Type of used oil and the frequency of shipments;
 - The processor owns the transport vehicle; and
 - Reclaimed oil will be returned to the generator.

BEST MANAGEMENT PRACTICES - NOT REQUIRED BUT RECOMMENDED

Training

- ☐ Train employees how to properly manage fluids.

Handling

- ☐ Use tight fitting lids, leak-proof spigots, funnels or pumps to transfer fluids.
- ☐ Prevent drips and spills wherever possible:
 - Use drip pans or trays to collect drips and spills where fluids are transferred, under leaking cars, and under parts that have been removed;
 - Drain and collect the fluids into a container on a covered, curbed and sealed concrete area away from any drains; and
 - Use dedicated equipment, such as drain pans or funnels, for oil-based waste streams to prevent cross-contamination with chlorinated solvent wastes.
- ☐ Do not mix contaminated fluids that can be reused with those that must be recycled or disposed of.
- ☐ Use self-closing funnels to add material to waste containers.

Storage

- ☐ Check all fluid storage containers on a weekly basis.

Spill Control

- ☐ Maintain spill control material and equipment near stored fluids.
- ☐ Do not use detergent and water to clean up spills. Use an oil absorbing mop or an absorbent material instead.

COMPLIANCE QUESTIONS

17a. Does your shop follow the requirements for mixing other waste with used oil in the Handling part of the Regulatory Requirements of this section?

☐ Y ☐ N

- ☐ If you mix any waste from Column B of Table I, page 43, with used oil, do you have permission from your used oil transporter?
- ☐ If you are a SQG and you mix any waste from Column C of Table I, page 43, with used oil, do you manage the mixture as hazardous waste?
- ☐ If you are a CESQG and you mix any waste from Column C of Table I, page 43, with used oil and the mixture has more than 1,000 parts per million of total chlorine compounds, do you manage the mixture as hazardous waste?

17b. For transporting and disposing of your used oil, do you do one or more of the following only:

☐ Y ☐ N

- ☐ Recycle used oil using a used oil transporter that is registered in Florida;
- ☐ Have a tolling arrangement contract that fulfills the Transport requirements in the Regulatory Requirements part of this section;
- ☐ Self-transport less than 55 gallons at a time to a registered used oil processor;
- ☐ Burn your used oil in a space heater that operates at less than 500,000 BTUs per hour and is vented to the outside; or
- ☐ Dispose of your used oil as hazardous waste?

17c. When managing containers and tanks of used oil, do you follow the Storage requirements listed in the Regulatory Requirements of this section?

☐ Y ☐ N

17d. If leaks or spills of used oil occurred, did you control the leak and clean up the spill as described in the Spill Control part of the Regulatory Requirements of this section?

☐ Y ☐ N

Does your shop properly dispose of used oil and properly manage containers and tanks of used oil?

To answer “YES” to this question you must be able to answer “YES” to questions 17a-17d above.

17.

☐ Y ☐ N

This is the answer to question #17 on the compliance checklist

Does your shop dispose of used oil on-site in any of the following ways, by: sending it to a septic tank; pouring it in a storm drain; pouring it in surface water such as a lake or stream; pouring it on or burying it in the ground; putting it in a dumpster or landfill; to control weeds or insects; for dust control; or burning it openly (this means anything except burning it in a space heater that operates at less than 500,000 BTUs per hour and is vented to the outside)?

18.

☐ Y ☐ N

This is the answer to question #18 on the compliance checklist

If you answered NO to question 17 or YES to question 18, it is a violation. Correct it as soon as possible and document the correction on your compliance checklist.

5.3 Used Filters: Oil, Transmission, and Fuel



Good Filter Storage



Bad Filter Storage

The purpose of oil, fuel, and transmission filters is to capture impurities from fluid being filtered. These impurities are often toxic metals, so used filters often contain very high concentrations of these metals and may be dangerous to both humans and the environment.

REGULATORY REQUIREMENTS

Storage

- ▶ Keep drained used oil filters in dedicated aboveground containers that do not leak.
- ▶ Clearly label used oil filter storage containers with the words "Used Oil Filters."
 - If the storage containers hold both used oil filters and fuel filters, label containers with the words "Used Oil and Fuel Filters." Label containers that just hold used fuel filters with the words "Used Fuel Filters."
- ▶ Keep the containers on concrete or another surface that oil cannot pass through.
- ▶ Keep the containers closed or otherwise protected from weather.

REGULATORY REQUIREMENTS - CONTINUED**Spill Control**

- ▶ If a leak or spill occurs:
 - Stop the leak;
 - Contain the spilled material;
 - Clean up the spilled material using kitty litter, shop rags or another absorbent; and
 - Repair or replace the storage container as necessary.

Documentation

- ▶ You must be able to demonstrate your used oil and used fuel filters have been properly handled for at least the past three years. Receipts from a used oil filter transporter would be sufficient.

Disposal

- ▶ If you transport your own used oil filters and used fuel filters, you must register with FDEP as a used oil filter transporter. Call the FDEP Hazardous Waste Regulation Section at (850) 245-8707 to learn how to register as a used oil filter transporter.
- ▶ Glass filters may be hazardous waste and will need to be managed as such unless lab testing shows they are not hazardous.
- ▶ It is illegal to put used oil filters or used fuel filters in trash that will be taken to a landfill.
- ▶ You are permitted to place your used oil filters and used fuel filters in the trash **ONLY** if your trash goes to a waste-to-energy plant (municipal incinerator); **AND** if you receive permission in writing from your waste hauler.

BEST MANAGEMENT PRACTICES - NOT REQUIRED BUT RECOMMENDED**Handling**

- ☐ Puncture and drain your used oil filters for 24 hours before you store them.
- ☐ Put oil drained from filters into your used oil storage container. (See Section 5.2 Used Oil for requirements on handling, storing and disposing of used oil.)
- ☐ Metal fuel filters can be managed with used oil filters once they have been drained dry.
- ☐ Hot drain used oil filters prior to storage.
- ☐ Drain and collect all fluids into a container on a covered, curbed and sealed concrete area away from any drains.
- ☐ Before crushing your used oil filters, ask your transporter if they will accept them crushed.

Storage

- ☐ Check all storage containers on a weekly basis.

Spill Control

- ☐ Maintain spill control material and equipment near stored fluids.
- ☐ Do not use detergent and water to clean up spills. Use an oil absorbing mop or an absorbent material instead.

Disposal

- ☐ If you are recycling your used oil filters, use a used oil filter transporter and processor that is registered and approved by the state. Call the FDEP Hazardous Waste Regulation Section (850) 245-8707 for a list of approved used oil/used oil filter transporters and processors.

COMPLIANCE QUESTIONS

19a. Are your used oil filters stored in aboveground containers that do not leak? ☐ Y ☐ N

19b. Are your used oil filter containers labeled with the words "Used Oil Filters?" ☐ Y ☐ N

19c. Are your used oil filter storage containers closed or otherwise protected from weather? ☐ Y ☐ N

19d. Are your containers stored on concrete or another surface that oil cannot pass through? ☐ Y ☐ N

Does your shop manage containers of used oil filters properly?
To answer "YES" to this question you must answer "YES" to questions 19a-19d above.

19.☐ Y ☐ N

This is the answer
to question #19
on the compliance
checklist

If you answered NO to question 19, it is a violation. Correct it as soon as possible and document the correction on your compliance checklist.

5.4 Used Coolant/Antifreeze

COMPLIANCE QUESTION

ANSWER THIS QUESTION FIRST:

Does your shop generate used antifreeze?

YES - Complete this section

NO - Skip to Section 5.5

20.

☐ Y ☐ N

This is the answer to question #20 on the compliance checklist

Most coolant/antifreeze is made of water and ethylene or propylene glycol. Ethylene glycol is toxic to wildlife, which is attracted to its sweet taste. Ethylene glycol can cause skin irritation and, if inhaled, headaches, dizziness, nausea, and heart palpitation. Large amounts of ethylene glycol can damage kidneys, the heart and the nervous system. Propylene glycol is not as harmful. During use antifreeze often picks up hazardous amounts of lead, cadmium, chromium, benzene and solvents. For this reason used coolant/antifreeze is often toxic hazardous waste.



REGULATORY REQUIREMENTS

There are two options for management of waste coolant/antifreeze:

Option A - The preferred option is to recycle.

- ▶ Keep all receipts and documentation of used antifreeze shipments and filter management. The written receipts or records must include:
 - Name and address of the generator and the recycling facility for off-site shipments;
 - The amount of used antifreeze shipped off-site or recycled on-site;
 - The amount of waste antifreeze filters shipped off-site; and the
 - Date of shipment or recycling.
- ▶ If you recycle antifreeze on-site at your shop, there will be wastes such as sludges, filters, or resins. Unless you know through lab testing that they are NOT hazardous, you must store and dispose of them as regulated hazardous waste.

Option B - If you do not recycle your used coolant/antifreeze, you must prove through periodic laboratory testing that it is not hazardous waste (see Appendix IV), or you must follow all regulatory requirements based on your generator status.

- Container Management, Section 3.1 (CESQG) or 4.1 (SQG);
- Employee Training, Section 3.2 (CESQG) or 4.2 (SQG);
- Spills and Leaks, Section 3.3 (CESQG) or 4.3 (SQG);
- Emergency Preparedness, Section 3.4 (CESQG) or 4.4 (SQG); and
- Waste Disposal and Documentation, Section 3.5 (CESQG) or 4.5 (SQG).

RECYCLING BEST MANAGEMENT PRACTICES - NOT REQUIRED**Storage**

- ☐ Use dedicated antifreeze collection equipment. Transfer used antifreeze immediately to a dedicated storage container that is compatible with the antifreeze stored in it.
- ☐ Keep coolant/antifreeze in containers that are in good condition and label them as “used coolant/antifreeze.”
- ☐ Keep coolant/antifreeze containers closed at all times except when emptying or filling and keep them out of the weather in a secure location.
- ☐ Inspect containers at least weekly to check for signs of leaks or deterioration caused by corrosion or other factors.
- ☐ Mark used coolant/antifreeze containers with the starting date of accumulation. Do not accumulate used coolant/antifreeze for longer than 180 days.

Training

- ☐ Train your employees in all of the practices that are described in this section.

COMPLIANCE QUESTION

Does your shop meet all requirements for recycling and/or disposing of used coolant/antifreeze as, described in this section's Regulatory Requirements?

21.
☐ Y ☐ N

This is the answer
to question #21
on the compliance
checklist

If you answered NO to question 21, it is a violation. Correct it as soon as possible and document the correction on your compliance checklist.

For more information contact:

- ▶ FDEP Hazardous Waste Regulation Section – (850) 245-8707
- ▶ CCAR GreenLink – (888) GRN-LINK (476-5465)

Or see the Florida Fact Sheet on Coolant/Antifreeze on the Internet at:

http://www.dep.state.fl.us/waste/quick_topics/publications/default.htm

5.5 Used Fluorescent and HID Light Bulbs and Mercury Switches

ANSWER THIS QUESTION FIRST:

Does your shop generate fluorescent and/or HID light bulbs or mercury switches?

☐ Y☐ N

YES - Complete this section

NO - Skip to Section 5.6

Using fluorescent or high intensity discharge (HID) lighting is a smart choice, because they use less energy and create less waste heat. However, fluorescent and HID bulbs also contain mercury, a toxic metal that can accumulate in living tissue and may cause health problems. Although the amount of mercury in each light-bulb is small, several million light bulbs are discarded by Florida businesses each year, making these light bulbs a large source of mercury in our garbage. Even though these light bulbs usually contain enough mercury to test "hazardous," they are in a special category and are not counted towards your hazardous waste generator status if properly disposed of or recycled.

Several types of automotive switches contain mercury, specifically: trunk and hood light switches, four-wheel drive anti-lock brake systems, and active control or leveling sensors. If the switch were clear, the mercury would be visible as a silvery liquid. However, most automotive mercury switches look like little bullets.

Mercury switches always contain more than enough mercury to test "hazardous," but if recycled, are not treated as hazardous waste or counted toward your generator status.

Mercury can contaminate the air, surface water, and ground water. In recent years, the buildup of mercury in fish has prompted warnings from the Department of Health about eating some fish.

Recycling is the recommended management option for mercury switches and fluorescent/HID light bulbs. A list of recycling facilities in Florida can be obtained by visiting FDEP's Mercury Contacts web site at: <http://www.dep.state.fl.us/waste/categories/mercury/pages/contacts.htm> or by calling the Hazardous Waste Management Section at 850-245-8759.



Bad Fluorescent Bulb Storage



REGULATORY REQUIREMENTS

These requirements are for shops that generate mercury switches and shops that dispose of 10 or less fluorescent/HID light bulbs per month. If you dispose of more than 10 light bulbs per month you have additional requirements for handling and recycling the light bulbs. Because they apply to very few automotive repair shops, we have not included the rules here. Please call the Hazardous Waste Reduction Section at (850) 245-8759 to learn what you should do.

Training

- ▶ Train your employees who manage fluorescent/HID light bulbs or mercury switches to properly package, prevent breakage, and to clean up and contain waste in the case of a leak or spill.

Handling

- ▶ Handle and store mercury switches and fluorescent/HID light bulbs in a way that prevents them from being broken.

Storage

- ▶ Label containers containing fluorescent/HID light bulbs:
 - "Spent Mercury-Containing Lamps for Recycling" if you are recycling your light bulbs.
 - "Waste Mercury Lamps" or "Used Mercury Lamps" if the light bulbs are picked up with your trash.
- ▶ Store mercury switches in a leak-proof, closed container labeled with
 - "Spent Mercury-Containing Devices for Recycling"
 - The date you first placed a mercury switch in an empty container
- ▶ Keep the storage container in a secure, dry area.
- ▶ Store your used mercury switches and bulbs no more than one year.

Documentation

- ▶ Keep receipts or logs of your disposal or recycling of mercury switches and Fluorescent/HID light bulbs for at least three years. The documentation should include:
 - Name and address of the recycler or disposal site,
 - Amount of waste shipped, and
 - Date of shipment.
- ▶ Keep a record that shows how long you have been storing your used mercury switches and bulbs, such as a label on the container with the start date of accumulation, a log or shipping papers.

REGULATORY REQUIREMENTS - CONTINUED**Spill Control**

- ▶ If someone breaks a fluorescent light bulb or mercury switch:
 - Immediately clean up the broken light bulb or mercury switch and store waste in a tightly sealed container.
 - Mark the container "Broken Fluorescent/HID Light Bulbs" or "Broken Mercury-Containing Devices for Recycling." Store them separately from unbroken lamps or mercury devices.
 - The used clean-up materials are probably hazardous waste. You must store and dispose of them as hazardous waste, as described in Chapter 3 (CESQG) or Chapter 4 (SQG), OR learn through lab testing that they are NOT hazardous and throw them in the trash.

Disposal

- ▶ Do not bury or dump your used fluorescent light bulbs on land or in the water, or send them to an incinerator. **IT IS ILLEGAL TO DO SO.**
- ▶ If you generate 10 or less used light bulbs per month, you can throw them in the trash, IF the waste is not going to an incinerator AND the landfill operator is willing to accept them (your solid waste hauler should be able to tell you where your waste is going).
- ▶ If you have more than one shop, you can transport 10 or less light bulbs per month from each of your shops to a central accumulation point at one of your own facilities. However, if this causes you to generate more than 10 bulbs at your central accumulation point, you must follow additional requirements. Call the FDEP Hazardous Waste Reduction Section at (850) 245-8759 to learn what you should do.
- ▶ Do not intentionally break or crush spent light bulbs unless you are using a bulb-crusher made specifically for that purpose.
- ▶ Do not dispose of used mercury switches in a septic tank, dumpster, storm drain, on the ground, or in water. **IT IS ILLEGAL TO DO SO.**
- ▶ Recycle mercury switches with a licensed metals recycler.

BEST MANAGEMENT PRACTICES - NOT REQUIRED BUT RECOMMENDED**Pollution Prevention**

- ☐ Recycle your used fluorescent/HID light bulbs. Avoid throwing light bulbs in the regular trash.
- ☐ Use low mercury, energy efficient fluorescent/HID light bulbs.
- ☐ Whenever possible, replace automotive switches that contain mercury (used in hood and trunk lighting and in anti-lock braking systems) with switches that do not contain mercury (ball bearing switches).

Emergency Preparedness

- ☐ Buy a mercury spill kit and train your employees how to use it.

Storage

- ☐ To prevent breakage, store fluorescent bulbs in the container in which they were shipped.
- ☐ Store the containers where they are not likely to be knocked over or run into.

Disposal

- ☐ Package light bulbs for recycling according to your recycler's recommendations.
- ☐ Do not tape light bulbs together for shipping.
- ☐ Do not over-stuff or under-fill the shipping boxes.

IMPORTANT

Spill Control

- ☐ If a light bulb or mercury switch is broken, immediately open the windows and close the door(s) to other rooms. If there are no windows, leave the door open and prop open all doors until there is a clear path to the outside. Mercury from the light bulb or switch will quickly turn into a vapor that is easily absorbed by the lungs.
- ☐ If a mercury switch is broken, use a mercury spill kit to clean up the spill. **Never use a shop vacuum, broom, or mop to clean up mercury from a mercury switch.** The mercury in fluorescent light bulbs is not in the easily recognized silvery liquid form. Consider the entire light bulb as hazardous waste when broken. Sweep the broken bulb into a sealable container for disposal as hazardous waste. **Never use a shop vacuum to clean up broken fluorescent light bulbs.**
- ☐ If you have a large mercury spill, evacuate the building and get professional clean-up help.

COMPLIANCE QUESTION

Does your shop comply with all requirements for fluorescent/HID light bulbs and mercury switches?

22.

☐ Y ☐ N

This is the answer to question #22 on the compliance checklist

If you answered NO to question 22, it is a violation. Correct it as soon as possible and document the correction on your compliance checklist.

5.6 Waste Tires

COMPLIANCE QUESTION

ANSWER THIS QUESTION FIRST:

Does your shop generate waste tires?

Yes - Complete this section

NO - Skip to Section 5.7

23.

☐ Y ☐ N

This is the answer to question #23 on the compliance checklist



When not properly managed, waste tires can provide a breeding ground for rodents and mosquitoes. Stored tires are also a serious fire hazard. Tires can be retreaded or reprocessed into rubber products, rubberized asphalt, or adhesives. They can also be used as fuel in power plants. Up to 80% of tires are now retreaded, recycled, or used as fuel.

REGULATORY REQUIREMENTS

Storage

- ▶ Keep your waste tires in one location on your property. Do not scatter them around the site.
- ▶ Stack tires neatly.
- ▶ Do not store waste tires in grassy areas.
- ▶ Maintain a fire lane around the pile.
- ▶ Store no more than 1,500 waste tires on your property at any one time. This includes both inside and outside storage.

Documentation

- ▶ If your shop hires someone to transport more than 25 tires per month for recycling or disposal, you must keep receipts or logs of your waste tire disposal or recycling. The documentation should include:
 - Name and address of the collector,
 - Name and address of the recycler or disposal site,
 - Registration number of the collector,
 - Amount of waste tires shipped, and
 - Date of shipment.

Disposal

- ▶ Do not burn, bury, or dump waste tires. **IT IS ILLEGAL TO DO SO.**
- ▶ Only contract with a registered collector to haul off waste tires. The collector that picks up the tires must have a current registration decal displayed on the driver side door of his vehicle.
- ▶ You remain responsible for your waste tires. If they are illegally dumped, you can be fined or required to pay for cleanup of the disposal site.
- ▶ If you haul your own waste tires in loads of more than 25 tires at a time, you must register with FDEP as a waste tire collector.
- ▶ Dispose of tires only at a facility authorized by FDEP to manage waste tires.

BEST MANAGEMENT PRACTICES - NOT REQUIRED BUT RECOMMENDED

Training

- ☐ Train your employees in handling, storage, disposal and/or recycling practices that follow the regulatory requirements and BMPs described in this section.

Storage

- ☐ Store waste tires indoors so they do not collect water and breed mosquitoes. If you must store them outside, store them under cover and protected from the weather.
- ☐ Keep the tires on rims, if possible, when storing tires outside, to reduce water collection.
- ☐ Transport stored waste tires regularly to reduce the number of tires on-site.

Recycling

- ☐ Arrange for your waste tires to be sent to a facility where they will be retreaded or processed.

For more information contact:

- ▶ FDEP Solid Waste Management – (850) 245-8707
- ▶ CCAR GreenLink – (888) GRN-LINK (476-5465)

COMPLIANCE QUESTIONS

24a. Do you store more than 1,500 tires on-site? If NO, skip to question 24c.

☐ Y ☐ N

24b. If yes, have you notified FDEP using form number 62-701.900(20)?

☐ Y ☐ N

24c. When your waste tires are transported for disposal, do you do one (or more) of the following only?

☐ Y ☐ N

- Use another tire collector registered with FDEP; and/or
- Haul your own tires and always transport fewer than 25 tires per load; and/or
- Haul your own tires and are registered with FDEP as a waste tire collector?

24d. Do you send your waste tires to a facility authorized to manage waste tires?

☐ Y ☐ N

24e. Do you keep records of your waste tire disposal?

☐ Y ☐ N

Does your shop comply with all requirements for waste tires?

To mark "YES" you must answer:

YES to questions 24a-24e above or

NO to question 24a and YES to questions 24c-24e above.

24.

☐ Y ☐ N

This is the answer to question #24 on the compliance checklist

If you answered NO to question 24, it is a violation. Correct it as soon as possible and document the correction on your compliance checklist.

5.7 Other Solid Waste

Auto shops generate many types of solid waste, such as used shop towels, empty aerosol cans, and empty containers and drums. Auto shops may also generate liquid wastes that are not hazardous, such as discarded liquid products that cannot be recycled or reused. Since these wastes can pollute the environment if they are not properly disposed of, they are often regulated by FDEP. This section covers only wastes that are not regulated as hazardous wastes; for information on how to manage hazardous wastes, please see Chapters 3 and 4 in this Workbook.



REGULATORY REQUIREMENTS

Storage

- ▶ Do not store solid waste in any area that is likely to flood.
- ▶ Do not store solid waste outdoors within:
 - 200 feet of a wetland;
 - 500 feet of any private drinking water well; or
 - 1,000 feet of any community drinking water well.
- ▶ Do not store solid wastes on the public right-of-way of a highway, road, or alley.
- ▶ Do not mix used oil with your solid waste.

Disposal

- ▶ Dispose of solid waste only at solid waste management facilities permitted by the FDEP or in dumpsters or roll-offs that are routinely picked up by commercial waste haulers.
- ▶ Do not bury or burn solid waste.
- ▶ Do not dump any liquid wastes on the ground, or in a ditch, swale, stormwater sewer, septic tank, lake, stream, or other surface water.
- ▶ Do not throw dirty wipes, paper towels or rags into the dumpster if they have come into contact with hazardous solvents or hazardous waste.

BEST MANAGEMENT PRACTICES - NOT REQUIRED BUT RECOMMENDED**Pollution Prevention**

- ☐ Reduce solid waste by laundering shop towels through an industrial laundry service that discharges its wastewater into a public sewer system.
- ☐ Use cleaning compounds that are not chlorinated and have low volatile organic compound (VOC) emissions.
- ☐ Reuse empty containers at your shop once they have been cleaned.
- ☐ Recycle metal containers like drums and cans. Check with the local solid waste landfill to see if they accept empty containers.

Training

- ☐ Train employees to dispose of all solid waste by putting waste in closed containers.

Handling

- ☐ Do not put towels dripping with used oil into the trash.
- ☐ Use up the contents of aerosol spray cans before opening a new can. Empty cans completely before discarding them. Spray cans that are completely empty and have had all the propellant discharged can be recycled as scrap metal.
- ☐ Use aerosol products up or dispose of them properly. Do not spray aerosol products into the air to empty the spray can.

Storage

- ☐ Store solid waste in containers in a clean, dry location.
- ☐ Store scrap metal for recycling in containers. At least half of the scrap metal you store should be recycled each year.
- ☐ Keep waste shop towels in a closed, fireproof container labeled "Used Shop Towels."

Disposal

- ☐ Do not dispose of dirty shop towels in vehicles that are to be crushed or shredded.
- ☐ Check with your solid waste authority to find out what wastes may be disposed of as solid waste at your location.
- ☐ Put liquid wastes in labeled containers and dispose of them properly.

Documentation

- ☐ Keep all solid waste disposal receipts for at least three years.

COMPLIANCE QUESTION

Does your shop comply with all requirements for solid waste as described in the Storage and Disposal parts of this section's Regulatory Requirements?

25.
☐ Y ☐ N

This is the answer to question #25 on the compliance checklist

If you answered NO to question 25, it is a violation. Correct it as soon as possible and document the correction on your compliance checklist.

5.8 Industrial Wastewater

Industrial wastewater, including floor wash waters and water from outdoor car washes, can pollute lakes, rivers, and drinking water if not properly managed. All industrial wastewater should be recycled on-site or collected and sent to a sewage treatment plant (also known as a Publicly Owned Treatment Works—POTW) with a Pretreatment Program capable of handling wastewater. You should contact your local POTW to make sure that it can handle your shop's industrial wastewater. Do not discharge wastewater to a POTW without its permission.



COMPLIANCE QUESTION

ANSWER THIS QUESTION FIRST:

Does your shop generate industrial wastewater?

YES - Complete this section

NO - You have completed the Compliance Self-Audit Workbook!

26.

Y N

This is the answer to question #26 on the compliance checklist

REGULATORY REQUIREMENTS

Handling

- ▶ Collect floor washwaters and water from outdoor carwashes and drain these industrial wastewaters to a POTW sewer that has an FDEP-approved Pretreatment Program and agrees to accept your industrial wastewater discharges. An alternative to sending wastewater to a POTW is a 100% wastewater recycling system. The recycling system will generate concentrated contaminated water (called “bleed”) that must be transported by an industrial wastewater hauler to a POTW. For additional information, please contact your nearest FDEP district office listed on the back cover of this Workbook.
- ▶ In case of an accidental spill or discharge, notify the local DEP district office or the POTW (if the discharge is to a permitted wastewater treatment facility). Please note that in such cases, a detailed written report describing the problem, remedial measures taken, and steps implemented to prevent the problem from happening again may be required.
- ▶ Do not drain your shop's washwaters and rinsewaters to a septic tank, stormwater pond, ditch, swale, lake, stream, other surface water, or onto the ground.
- ▶ If you have an oil/water separator for your wastewater, you must:
 - properly maintain it and keep it free of debris;
 - recover the oil and recycle it with your shop's used oil (see *Section 5.2 for more information*);
 - determine whether the sludge from the oil/water separator is hazardous, and properly dispose of the sludge based on that waste determination (see *Chapter 2 for more information*); and
 - discharge overflow from the oil/water separator to the POTW or 100% recycle system.

- ▶ Even if it is not hazardous waste, do not dispose of water from your parts washer in the sanitary sewer, septic tank, stormwater pond, ditch, swale, lake, stream, other surface water, or onto the ground.

Training

- ▶ Train your staff to follow all of the regulatory requirements above.

Floor Drains

- ▶ Floor drains that are not connected to a sewer line are considered Class V Motor Vehicle Waste Disposal Wells if used to receive fluids from vehicle repair or maintenance activities (this includes drainage from car wash stations). In order to protect drinking water, **Florida DEP regulations prohibit using floor drains not connected to a sewer system, unless the owner/operator seeks a waiver and obtains a permit**, if applicable. Constructing new motor vehicle waste disposal wells is prohibited nationwide, due to the risk of polluting groundwater.



BEST MANAGEMENT PRACTICES - NOT REQUIRED BUT RECOMMENDED

Pollution Prevention

- ☐ Keep your shop clean. Prevent spills and leaks that may add contaminants to floor rinse waters.
- ☐ Minimize your shop's water usage. If you use less water, there will be less wastewater to manage.
- ☐ If you have floor drains, know if they lead to a municipal sewer line, to a surface discharge, to a leakproof sump, or to a shallow injection well. Shop managers should obtain the diagrams for all the existing underground construction at their facility to track the transport of any fluids that might go to a floor drain.
- ☐ Know all sources of fluids that flow onto or originate from your shop's property, including rain, fuel, motor vehicle fluids, and wastewater from bathrooms and sinks.
- ☐ Conduct regular inspections of your shop's equipment, operations, and structures; perform maintenance as needed to prevent spills from causing water pollution.
- ☐ Consider running a "Dry Shop" to help reduce the potential for industrial wastewater releases.

Training

- ☐ Train staff on good housekeeping skills. At the end of the day, spend 15 minutes to clean up materials.

RUNNING A DRY SHOP

A Dry Shop is one that uses no water, or very little water, to clean the floors.

How to Run a Dry Shop

- ☐ Do not wash the floors or use wet mops to clean up spills.
- ☐ Clean up small spills with rags. Do not saturate the rags.
- ☐ If the spills are solvents or gasoline, use appropriate absorbents to clean the spill and dispose of the absorbents as hazardous waste.
- ☐ Use hydrophobic mops and absorbents to absorb oil. Hydrophobic mops do not absorb water.

For more information on running a Dry Shop visit our web site at:

<http://www.dep.state.fl.us/waste/categories/hazardous/pages/AutomotiveCompliance.htm>.

For additional resources please visit the FDEP Wastewater website at:

<http://www.dep.state.fl.us/water/wastewater/index.htm>. Relevant resources include an upcoming document on BMPs for 100% closed-loop recycle systems at vehicle and other equipment wash facilities.

COMPLIANCE QUESTION

Does your shop meet all requirements for handling industrial wastewater as described in the Handling, Training and Floor Drains parts of this section's Regulatory Requirements?

27.

☐ Y ☐ N

This is the answer to question #27 on the compliance checklist

If you answered NO to question 27, it is a violation. Correct it as soon as possible and document the correction on this checklist.

Congratulations! You have completed the Compliance Assistance Self-Audit Workbook!

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Appendix II - Resources and References

Florida State Resources

24-Hour State Spill Reporting Center

Florida Department of Community Affairs
Point of contact for reporting spills and other hazardous materials incidents.

Phone: 800-320-0519, 850-413-9900 (Emergencies Only),
850-413-9911 or 850-413-9912 (Non-emergencies)

Florida Department of Environmental Protection (FDEP)

District offices and the Tallahassee office offer technical assistance, fact sheets and other publications on hazardous waste regulations.

FDEP - Hazardous Waste Regulation Section

Phone: 800-741-4337 or 850-245-8707
Fax: 850-245-8810

Available publications include:

- ▶ Summary of Hazardous Waste Regulations
- ▶ Requirements for Conditionally Exempt Small Quantity Generators
- ▶ Requirements for Small Quantity Generators
- ▶ Handbook for Small Quantity Generators of Hazardous Waste

FDEP - Hazardous Waste Management Section

Hazardous Waste and Used-Oil/Special Wastes Transporters. Phone: 800-741-4337 or 850-245-8707

For Hazardous Waste, Used Oil and Mercury

<http://www.dep.state.fl.us/waste/categories/hwRegulation/default.htm>

FDEP - Florida Small Business Assistance Program

The Small Business Assistance Program helps businesses with environmental concerns and problems related to compliance with air regulations. Assistance is confidential and staff experts have business experience.

Phone: 800-722-7457 or 800-SBAP-HLP

<http://www.floridadep.org/air/emission/sbeap/sbeap.htm>

Florida Department of Transportation (DOT)

Motor Carrier Compliance

Labeling & packaging information

Phone: Toll Free 866-374-FDOT(3368) or 850-414-4100

<http://www.dot.state.fl.us/mcco/>

Federal Resources

24-Hour National Spill Reporting Center

National Response Center

Phone: 800-424-8802 or 202-267-2675

<http://www.nrc.uscg.mil>

Department of Transportation (DOT) Hotline

Office of Hazardous Materials Standards (DOT)

Research and Special Programs Administration

1200 New Jersey Ave, SE East Building, 2nd Floor

Washington, DC 20590

Phone: 202-366-4488 or 800-467-4922

Fax: 202-366-3753

<http://phmsa.dot.gov/hazmat/info-center>

Answers questions on matters related to DOT's hazardous materials transportation regulations.

NIOSH - National Institute for Occupational Safety and Health

Phone: 800-356-4674

<http://www.cdc.gov/niosh/homepage.html>

OSHA - Occupational Safety & Health Administration

Phone: 800-321-OSHA (6742)

<http://www.osha.gov/>

U.S. Environmental Protection Agency (EPA)**U.S. EPA - Compliance Assistance Centers**

1200 Pennsylvania Ave, NW Washington, DC 20460

Phone: 202-564-7076

<http://www.epa.gov/compliance/assistance/index.html>

The EPA has published a series of industry-specific guidelines and handbooks on preventing pollution and complying with hazardous waste regulations.

U.S. EPA - Emergency Planning and Community Right-to-Know

Phone: 800-535-0202 or 703-412-9810

TDD: 800-553-7672 or 703-412-3323

<http://www.epa.gov/lawsregs/laws/epcra.html>

Facilities that store, use, or release certain chemicals, are subject to various reporting requirements. Reported information is then made publicly available so that interested parties may become informed about potentially dangerous chemicals in their community.

U.S. EPA - Environmental Protection Agency Headquarters Library

1200 Pennsylvania Ave, NW.

IRC (3404)

Washington, DC 20460

Phone: 202-566-0556; Fax: 202-566-0562

<http://www.epa.gov/natlbra/ols.htm> (on-line library)

Maintains environmental reference materials for EPA staff and the general public, including books, journals, abstracts, newsletters, and audio-visual materials generated by government agencies and the private sector.

U.S. EPA - RCRA Docket Information Center (RIC)**RCRA Docket Information Center**

1200 Pennsylvania Ave, NW (5305W)

Washington, DC 20460

Phone: 202-566-0270

Fax: 202-566-0272

E-mail: rcra-docket@epa.gov

<http://www.epa.gov/wastes/inforesources/ric.htm>

Provides public access to all regulatory materials on solid and hazardous waste and distributes technical and non-technical information on solid and hazardous waste.

U.S. EPA - RCRA in Focus Vehicle Maintenance (EPA530-K-99-004)

You can obtain copies by contacting the RCRA Call Center and requesting the document number listed above. You can also view the document online at:

<http://www.epa.gov/lawsregs/sectors/automotive.html>

U.S. EPA - Region IV (AL, FL, GA, KY, MS, NC, SC, TN)**Sam Nunn Atlanta Federal Center**

61 Forsyth Street, SW

Atlanta, GA 30303

Phone: 800-241-1754 or 404-562-9900

Fax: 404-562-8174

<http://www.epa.gov/region4>

US EPA- Asbestos and Small Business Ombudsman (ASBO)

1200 Pennsylvania Avenue, N.W.

Washington, DC 20460

Phone: 202-564-6568

Mainline: 202-566-2075

Hotline: 1-800-368-5888 and 202-566-1970 (DC area)

Fax: 202-566-1505

<http://www.epa.gov/sbo>

Helps private citizens, small businesses, and smaller communities with questions on all program aspects within EPA.

U.S. EPA - Waste Information Resources

<http://www.epa.gov/epawaste/index.htm>

Provides a consolidated group of web links for many aspects of waste management including regulations, database queries, and compliance assistance to small businesses.

Other Resources:

Environmental Yellow Pages, Inc.

PO Box 771375

Coral Springs, Florida 33077

Phone: 800-451-1458

<http://www.enviroyellowpages.com/>

Provides information on education, reference, health, environmental products and professional services in the environmental industry.

Global Recycling Network

PO Box 24017

Guelph, Ontario, Canada N1E6V8

Phone: 519-658-9580

<http://grn.com/grn/>

A free-access public site for recycling-related information.

Greenlink

10901 Lowell Ave., Suite 201

Overland Park, KS 66210

Phone: 888-GRN-LINK (476-5465)

<http://www.ccar-greenlink.org/>

CCAR-GreenLink® is the National Automotive Environmental Compliance Assistance Center. The site contains environmental compliance and pollution prevention information related to the automotive industry.

Material Safety Data Sheet (MSDS) Sites

MSDS-Search, Inc.

Phone: 615-824-0712

<http://www.msdssearch.com/Default.htm>

Safety Information Resources, Inc.

<http://hazard.com/msds/index.php>

Chemical Abstracts Service (fee based)

Phone: 800-631-1884

<http://www.cas.org>

SAGE: Solvent Alternatives Guide

Phone: 919-541-6747

<http://www.p2pays.org/ref/19/18161/altern.cfm.htm>

A guide to pollution prevention information on solvent and process alternatives for parts cleaning and degreasing.

Waste Exchange

The Southern Waste Information eXchange (SWIX)

P.O. Box 960

Tallahassee, FL 32302

Phone: 800-441-7949

Fax: (850) 386-4321

Email: swix@mail.fsu.edu

<http://www.wastexchange.org/>

A source of information concerning recycled products, the availability of and demand for waste materials, and waste management services and products.

Appendix III - County Hazardous Waste Contacts -

ALPHABETIC BY COUNTY

Alachua

Environmental Protection
Department
201 SE 2nd Ave. #201
Gainesville, Florida 32601-6813
Ph: (352) 264-6806

Apalachee Regional Planning Council (ARPC)

Contracted Counties: Calhoun,
Franklin, Gulf, Jackson, Jefferson,
Liberty, Wakulla
20776 Central Avenue East #1
Blountstown, Florida 32424
Ph: (850) 488-6211

Baker (see NEFRPC)

Bay

Bay County Solid Waste
Management Department
11411 Landfill Rd.
Panama City Beach, Florida 32413
Ph: (850) 236-2213

Bradford (see NCRPC)

Brevard

Office of Natural Resources
Management
2725 Judge Fran Jamieson Way,
Bldg A, Viera, Florida 32940
Ph: (321) 633-2017, ext 1

Broward

Pollution Prevention, Remediation
and Air Quality Division
1 North University Dr., Suite 102
Plantation, Florida 33324
Ph: (954) 519-1259

Calhoun (see APRPC)

Charlotte

Charlotte County Environmental &
Extension Service
25550 Harborview Rd., Unit 2
Port Charlotte, Florida 33980
Ph: (941) 764-4386

Citrus

Citrus County Dept. of Public
Safety
230 W. Gulf to Lake Hwy.
Lecanto, Florida 34461
Ph: (352) 527-7670

Clay

Clay CPHU/Environmental Health
PO Box 578
1305 Idelwild Ave.
Green Cove Springs, Florida 32043
Ph: (904) 284-6341

Collier

Collier County Pollution Control
3301 E. Tamiami Trail
Naples, Florida 34112
Ph: (239) 252-2502

Columbia (see NCRPC)

Central Florida Regional Planning Council (CFRPC)

Contracted Counties: Hardee,
Okeechobee, Desoto
555 East Church Street
Bartow, Florida 33830-3931

Dade

Industrial Facilities Section
701 NW 1st Court, 7th Floor
Miami, FL 33136
Ph: (305) 372-6685

Desoto (No Program)

Dixie (see NCRPC)

Duval

Duval County Environmental
Resource Management
Dept/Environmental Quality
Division.
117 West Duval St. Suite 225
Jacksonville, Florida 32202
Ph: (904) 255-7137

Escambia

Escambia County Department of
Solid Waste Management
13009 Beulah Road
Cantonment, Florida 32533-8831
Ph: (850) 937-2156

Flagler

Flagler County Solid Waste
1769 East Moody Blvd.
Bunnell, Florida 32110
Ph: (386) 517-2075

Franklin (see APRPC)

Gadsden

Gadsden County Fire Department
18216 Blue Star Hwy.
Quincy, Florida 32351
Ph: (850) 875-8662

Gilchrist (see NCRPC)

Glades

1926 Victoria Ave.
Ft. Myers, Florida 33901
Ph: (239) 338-2550

Gulf

Gulf County Solid Waste Dept.
1001 10th Street
Port St. Joe, Florida 32456
Ph: (850) 227-3696

Hamilton (see NCRPC)

Hardee (see CFRPC)

Hendry

Hendry County Solid Waste Dept.
3300 Utility Drive
LaBelle, Florida 33935
Ph: (863) 675-5252

Hernando

Hernando County Solid Waste &
Recycling Division
14450 Landfill Rd.
Brooksville, Florida 34614
Ph: (352) 754-4112

Highlands

Emergency Operations Center
(E.O.C.)
6850 George Blvd.
Sebring, Florida 33875
Ph: (863) 385-1112

County Hazardous Waste Contacts - *CONTINUED*

Hillsborough

Environmental Protection
Commission
3629 Queen Palm Drive
Tampa, Florida 33619
Ph: (813) 627-2600 , x1315

Holmes (see WFRPC)

Indian River

Indian River Health
Dept./Environmental Health
1900 27th Street
Vero Beach, Florida 32960
Ph: (772) 794-7440

Jackson (see APRPC)

Jefferson (see APRPC)

Lafayette (see NCRPC)

Lake

Lake County Solid Waste Dept.
13130 Astatula Landfill Road
Tavares, Florida 32778
Ph: (352) 343-3776 x1669

Lee

Lee County Division of Natural
Resources Management
190 Evergreen Road
Fort Myers, Florida 33903
Ph: (239) 652-6126

Leon

City of Tallahassee Water Quality
Division
3805 Springhill Rd.
Tallahassee, Florida 32310-6502
Ph: (850) 891-1227

Levy (see WITHRPC)

Liberty (see APRPC)

Madison (see NCRPC)

Manatee

Environmental Management
Department
PO Box 1000
202 6th Ave East
Bradenton, Florida 34208
Ph: (941) 742-5980

Marion

Marion County Hazardous Waste
Dept.
5601 SE 66th
Ocala, Florida 34480
Ph: (352) 671-8477

Martin

Martin County Utilities & Solid
Waste Department
2378 SE Ocean Blvd.
Stuart, Florida 34995
Ph: (772) 288-5700

Monroe

Monroe County Health
Department
13367 Overseas Hwy
Marathon, Florida 33050
Ph: (305) 289-2721

Nassau (see NEFRPC)

North Central Florida Regional Planning Council (NCRPC)

Contracted Counties: Bradford,
Columbia, Dixie, Gilchrist,
Hamilton, Lafayette, Madison,
Suwannee, Union
2009 NW 67th Place
Gainesville, Florida 32653-1603
Ph: (352) 955-2200

Northeast Florida Regional Planning Council (NEFRPC)

Contracted Counties: Baker,
Nassau
6850 Belfort Oaks Place
Jacksonville, Florida 32216
Ph: (904) 279-0885 , x113

Okaloosa (see WFRPC)

84 Ready Ave.
Fort Walton Beach, Florida 32548
Ph: (850) 651-7394

Okeechobee (see CFRPC)

Orange

Orange County Environmental
Protection
Leeds Commerce Center, Suite 4
800 Mercy Drive
Orlando, Florida 32808
Ph: (407) 836-1414

Osceola

Hazardous Waste Division
750 South Bass Rd.
Kissimmee, Florida 34744
Ph: (407) 962-1101

Palm Beach

Palm Beach Health
Dept./Environmental Health
800 Clematis Street
West Palm Beach, Florida 33402
Ph: (561) 837-5900

Pasco

Government Complex
7530 Little Road
New Port Richey, Florida 34654
Ph: (727) 847-8041 x8718
Fax: (727) 596-8064

Pinellas

Environmental Mgt. Dept.
3095 114th Ave. N.
St. Petersburg, Florida 33716
Ph: (727) 464-7505

Polk

Polk County Fire Services
10 Environmental Loop S.
Winter Haven, Florida 33880
Ph: (863) 284-4319 x203
Fax: (863) 284-4321

Putnam

Fire Marshal
410 South SR 19
Palatka, Florida 32177
Ph: (386) 329-0464
Fax: (386) 329-0897

Santa Rosa (see WFRPC)

Sarasota

Hazardous Waste Management
8750 Bee Ridge Road
Sarasota, Florida 34241
Ph: (941) 861-5000

County Hazardous Waste Contacts - CONTINUED**Seminole**

Seminole County Solid Waste
Management
1950 State Road 419
Longwood, Florida 32750
Ph: (407) 665-2261

St. Johns

St. Johns County Tillman Ridge
Landfill
3005 Allen Nease Road
Elkton, Florida 32033
Ph: (904) 827-6980

St. Lucie

Baling & Recycling Facility
6120 Glades Cut-Off Rd.
Ft. Pierce, Florida 34981
Ph: (772) 462-1624
Fax: (772) 462-6987

Sumter

Sumter County Sheriffs Office
1010 North Main St Bushnel,
Florida 33513
Ph: (352) 793-0212

Suwannee (see NCRPC)**Taylor**

Taylor County Solid Waste
Department
3750 Hwy 98 West
Perry, Florida 32347
Ph: (850) 838-3533
Fax: (850) 838-3538

Union (see NCRPC)**Volusia**

Volusia County Environmental
Management
123 W. Indiana Avenue
DeLand, Florida 32720
Ph: (386) 736-5927 x2073
Fax: (386) 740-5193

Wakulla (see APRPC)**Walton**

Emergency Management and
Public Safety Communications
Division
75 South Davis Lane
DeFuniak Springs, Florida
Ph: (850) 892-8065

Washington (see WFRPC)**West Florida Regional
Planning Council (WFRPC)**

Contracted Counties: Holmes,
Okaloosa, Santa Rosa, Washington
4081 East Olive Rd. Suite A,
Pensacola, Florida 32514
Ph: (850) 332-7976

**Withlatchoochee Regional
Planning Council
(WITHRPC)**

Contracted Counties: Levy
1241 S.W. 10 Street
Ocala, Florida 34471
Ph: (352) 732-1315 x228
Fax: (352) 732-1319

Appendix IV - Hazardous Waste Determination

In Chapter 2, a quick method for determining hazardous waste generation was provided for you, but it may overestimate the amount of hazardous waste you generate. That might be adequate for most auto repair shops because the result of overestimation is still below the 220 pound monthly limit for CESQGs. But the quick shortcut method may not have included all of your wastes. This longer version will give you a more precise and complete accounting of your wastes. Shops that generate other types of wastes than those listed in Chapter 2, or shops that believe their wastes may not be properly categorized by the shortcut method, must use this longer, more comprehensive method to identify hazardous wastes and determine generator status. The following steps will walk you through this comprehensive process to first determine your solid wastes and then help you figure out which

Step 1 Determine if you have a solid waste.

To be considered a hazardous waste, a material must first be classified as a solid waste. A solid waste is any discarded solid, semisolid, liquid or contained gaseous material. Obviously, something thrown into a dumpster is a solid waste. However, material dumped onto the ground, abandoned, disposed of, recycled, burned or incinerated, or stored, accumulated, or treated (before or instead of being recycled or disposed of) is also a solid waste. (There are some exceptions for recycled materials.)

Step 2 Identify the ingredients and the hazardous characteristics for each of your solid wastes.

- ▶ Check the Material Safety Data Sheet (MSDS) for information. If you do not have it on hand, contact your supplier/manufacturer for a copy of the MSDS for more information; and
- ▶ Check the product label for ingredients and for warnings of dangerous characteristics (e.g., flammable, corrosive, reactive, toxic).

Step 3 Determine if you have "listed" hazardous wastes.

Your waste is "listed" hazardous waste if it appears on any of four lists published by EPA in Title 40, Part 261 of the Code of Federal Regulations (40 CFR Part 261). Currently, more than 400 wastes are listed. Wastes are listed because they are known to be harmful to human health or the environment when not managed properly, regardless of their concentrations. Table A shows the listed hazardous wastes that are most commonly generated by auto repair shops, along with examples of how each one might be generated. It also shows the chemical name for the ingredient that makes the waste hazardous. Table B includes a summary of other types of listed wastes.

Table A - Listed Hazardous Wastes Commonly Generated by Auto Repair Shops

Note: This list of common automotive shop wastes is not all inclusive.

Waste Code	Material	Examples
F002	<ul style="list-style-type: none"> ▶ tetrachloroethylene (also called perchlorethylene or perc) ▶ trichloroethylene ▶ methylene chloride ▶ 1,1,1-trichloroethane ▶ 1,1,2-trichloro-1,2,2-trifluoroethane ▶ chlorobenzene ▶ ortho-dichlorobenzene ▶ trichlorofluoromethane ▶ 1,1,2-trichloroethane 	Carburetor cleaners (perc) Brake cleaners (perc, trichloroethylene) Parts Cleaners Solvent degreasers Vapor degreasers
F003	<ul style="list-style-type: none"> ▶ xylene ▶ acetone ▶ ethyl acetate ▶ ethyl benzene ▶ ethyl ether ▶ methyl isobutyl ketone ▶ n-butyl alcohol ▶ cyclohexanone ▶ methanol 	Acetone Paint thinners (xylene) Carburetor and fuel injector cleaners (containing xylene)
F004	<ul style="list-style-type: none"> ▶ cresols ▶ cresylic acid ▶ nitrobenzene 	Carburetor dip cleaner (cresylic acid)
F005	<ul style="list-style-type: none"> ▶ toluene ▶ methyl ethyl ketone ▶ carbon disulfide ▶ isobutanol ▶ pyridine ▶ benzene ▶ 2-ethoxyethanol ▶ 2-nitropropane 	Lacquer thinners (toluene, methyl ethyl ketone) Carburetor and fuel injector cleaners (containing toluene)

Table B - Listed Hazardous Wastes

The F List - These are wastes from a variety of common industrial and manufacturing processes.

The F list wastes can be divided into seven groups, depending on how they are generated:

1. Spent solvent waste (waste codes F001 through F005);
2. Electroplating and other metal finishing wastes (F006 through F019);
3. Dioxin-bearing wastes (F020 through F023 and F026 through F028);
4. Chlorinated aliphatic hydrocarbons production wastes (F024 and F025);
5. Wood preserving wastes (F032, F034, and F035);
6. Petroleum refinery wastewater treatment sludges (F037 and F038); and
7. Multisource leachate (F039).

The K List - These are hazardous wastes produced by specific industrial or manufacturing processes.

The K list wastes can be divided into thirteen different categories:

1. Wood preservation;
2. Organic chemicals manufacturing;
3. Pesticides manufacturing;
4. Petroleum refining;
5. Veterinary pharmaceuticals manufacturing;
6. Inorganic pigment manufacturing;
7. Inorganic chemicals manufacturing;
8. Explosives manufacturing;
9. Iron and steel production;
10. Primary aluminum production;
11. Secondary lead processing;
12. Ink formulation; and
13. Coking (processing of coal to produce coke, a material used in iron and steel production).

U and P Hazardous Waste: These are wastes that are pure or technical grade commercial chemical products that have not been used but have become wastes:

- ▶ U001 to U411: toxic materials. Examples: U002 acetone, U080 methylene chloride, U154 methanol, U165 naphthalene, U210 tetrachloroethylene, U220 toluene, U228 trichloroethylene, U239 xylene.
- ▶ P001 to P205: wastes that are acutely toxic. One kilogram (2.2 pounds) or more per month qualifies a facility for Large Quantity Generator status. Examples: P089 parathion, P108 strychnine, P105 sodium azide, P001 warfarin (for pest control).

Step 4 Determine if you have mixtures of “listed” hazardous wastes and other solid waste.





A mixture of any amount of a non-hazardous solid waste and any amount of a listed hazardous waste is a listed hazardous waste. Some examples include the following: toluene-contaminated cleaning rags, perc still bottoms, kitty litter used to clean up a spill of a listed hazardous waste, soil or debris that has been contaminated with a listed hazardous waste. Mixing listed waste with non-hazardous waste will increase the amount of hazardous waste that you generate. To avoid increased disposal cost, you should be careful to keep listed hazardous waste separate from other non-hazardous wastes.

Determine if you generate “characteristic” hazardous wastes.

Step 5

Solid wastes that are ignitable, corrosive, reactive or toxic are characteristic hazardous wastes. Even if your waste is not on one of the EPA lists (an F, K, U, or P listed waste), it still might be regulated as a hazardous waste if it exhibits one or more of these four hazardous characteristics. Table C shows the definitions and wastes codes for each characteristic. Table C also gives examples of each type of characteristic waste that may be generated by auto repair shops. You may be able to use the information you collected in Step 2 to determine if your solid waste demonstrates any of the hazardous waste characteristics. If you do not have enough information from the MSDS and product label or if contaminants have been added during use of the product, you may need to have a sample of the waste analyzed by an approved lab.

Table C Characteristic Hazardous Wastes

D001	Ignitable 	A liquid that will ignite (flash point) at less than 140°F.	Spent solvents Mineral spirits Waste gasoline Solvent still bottoms
D002	Corrosive 	Corrodes metals or is a strong acid or a strong base (pH ≤ 2 or ≥ 12.5).	Rust remover Car battery acid Drain cleaner Muriatic acid, Sulfuric acid Solutions of sodium hydroxide
D003	Reactive 	Is very unstable and readily undergoes violent change without detonating, reacts violently, forms a potentially explosive mixture, or generates a toxic gas when mixed with water.	Sodium azide in undeployed airbags Roadside flares Fireworks Gunpowder
D004-D043	Toxic 	Can harm or kill if eaten or drank or absorbed through the skin or lungs. A group of heavy metals and organic chemicals that are harmful in very small quantities. Wastes that have above a set concentration of any of these chemicals are defined as toxic.	<div> Sludges Heavy metals Waste gasoline Spray cabinet wash water (possibly) </div> <div> Contaminated cleanup materials or soil </div> <div> Might contain: lead benzene tetrachloro-ethylene trichloro-ethylene mercury </div>

D004 to D043 Toxic Hazardous Waste - The extracts from a representative sample of the following wastes are tested and are found to contain certain contaminants in greater concentrations than permissible as listed in Table I of 40 CFR 261.

Arsenic D004	1,4-Dichlorobenzene D027	Nitrobenzene D036
Barium D005	1,2-Dichloroethane D028	Pentachlorophenol D037
Benzene D018	1,1-Dichloroethylene D029	Pyridine D038
Cadmium D006	2,4-Dinitrotoluene D030	Selenium D010
Carbon tetrachloride D019	Endrin D012	Silver D011
Chlordane D020	Heptachlor (and its epoxide) D031	Tetrachloroethylene D039
Chlorobenzene D022	Hexachlorobenzene D032	Toxaphene D015
Chloroform D021	Hexachlorobutadiene D033	Trichloroethylene D040
Chromium D007	Hexachloroethane D034	2,4,5-Trichlorophenol D041
o-Cresol D023	Lead D008	2,4,6-Trichlorophenol D042
m-Cresol D024	Lindane D013	2,4,5-TP (Silvex) D017
p-Cresol D025	Mercury D009	Vinyl chloride D043
Cresol D026	Methoxychlor D014	
2,4-D D016	Methyl ethyl ketone D035	

Step 6 Use Appendix IVB to determine if your mixture of used oil and hazardous waste must be managed as hazardous waste.

Step 7 Record your hazardous waste determination results.

Record all waste codes for all of your wastes in a place where you can go back to them in the event that one of your wastes changes. Remember, a waste is hazardous based on what material it was composed of before use, or how it changed during use, or if something was added to it during use. Any change in your shop's procedure may change your waste enough to make it hazardous, or non-hazardous, at any time during use, or storage after use.

Step 8 Repeat Steps 1 through 7 for each solid waste that your shop generates.

Step 9 Determine your monthly generation rate for each hazardous waste identified.

After you have completed all hazardous waste determinations, return to Chapter 2 of the Workbook and enter your maximum monthly generation of hazardous wastes on Worksheet I to be included in determining your hazardous waste generator status.

Appendix IVB - Hazardous Waste and Used Oil Mixture Determination

In Section 5.2 a simplified method is provided for determining whether a mixture of hazardous waste and used oil is required to be managed as a hazardous waste. This appendix provides a more complete and accurate method of making that determination.

How to manage your mixture of hazardous waste and used oil

If your hazardous waste is ...	And the mixture of your hazardous waste and used oil is ...	Then the mixture of hazardous waste and used oil should be managed as ...
D001 (ignitable) but no other characteristic and not listed or Listed in 40 CFR Part 261 Subpart D only because it is ignitable*	NOT ignitable (but may be corrosive, reactive, or toxic if the used oil alone is corrosive, reactive or toxic)	Used oil in all cases [If you are CESQG, manage as used oil even if the mixture is ignitable]
D002 (corrosive) D003 (reactive) D004-D043 (toxic) or Listed in 40 CFR Part 261 Subpart D only because it is corrosive or reactive**	Ignitable, corrosive, reactive or toxic (even if the used oil alone is ignitable, corrosive, reactive or toxic)	Hazardous waste if you are SQG Used oil if you are CESQG and the mixture has less than 1000 parts per million of halogenated solvents***
Listed in 40 CFR Part 261 Subpart D (except listed only because it is ignitable, corrosive or reactive)	[makes no difference]	Hazardous waste if you are SQG Used oil if you are CESQG and the mixture has less than 1000 parts per million of halogenated solvents***

* Wastes listed because of ignitability: F003 spent nonhalogenated solvents; U001 Acetaldehyde; U002 Acetone; U008 Acrylic acid; U031 n-Butyl alcohol; U055 Cumene; U056 Cyclohexane; U057 Cyclohexanone; U092 Dimethylamine; U110 Di-n-propylamine; U112 Ethyl acetate; U113 Ethyl acrylate; U117 Ethyl ether; U124 Furan; U125 Furfural; U154 Methanol; U161 Methyl isobutyl ketone; U185 1,3-Pentadiene; U213 Tetrahydrofuran; U239 Xylene

** Wastes listed because of corrosivity: U020 Benzenesulfonyl chloride
Wastes listed because of reactivity: K044 wastewater treatment sludges from explosives; K045 spent carbon from treating explosive wastewater; K047 pink/red water from TNT operations; P009 Ammonium picrate; P081 Nitroglycerine; P112 Tetranitromethane; U020 Benzenesulfonyl chloride; U096 Cumene hydroperoxide; U189 Sulfur phosphide

*** Halogenated solvents are solvents that contain chlorine, fluorine, bromine or iodine. A CESQG can mix small amounts of hazardous waste with used oil and manage the mixture as used oil with permission from the used oil transporter. However, any mixture that contains more than 1000 parts per million of halogenated solvents (such as perchloroethylene or trichloroethylene, e.g. from brake cleaner) must be managed as hazardous waste.

Appendix V - Emergency Preparedness Tools

EMERGENCY RESPONSE INFORMATION

Emergency Coordinator

Name: _____

Telephone: _____

Fire Extinguisher

Location(s): _____

Spill-Control Materials

Location(s): _____

Fire Alarm (if present)

Location(s): _____

Fire Department

Telephone: _____



EMERGENCY RESPONSE PROCEDURES

In the event of a spill:

Contain the flow of hazardous waste to the extent possible, and as soon as is possible, clean up the hazardous waste and any contaminated materials or soil.

In the event of a fire:

Call the fire department and, if safe, attempt to extinguish the fire using a fire extinguisher.

In the event of a fire, explosion, or other release that could threaten human health outside the facility, or if you know that the spill has reached surface water:

Call the National Response Center at its 24-hour number (800 424-8802). Provide the following information:

Our company name: _____

Our address: _____

Our U.S. EPA identification number: _____

Date of accident _____

Time of accident _____

Type of accident (e.g., spill or fire) _____

Quantity of hazardous waste involved _____

Extent of injuries, if any _____

Estimated quantity and disposition of recovered materials, if any _____



Sample Letter to Local Authorities

(Date)

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

999 Emergency Road
Jacksonville FL 32257

RE: My Company Inc., 191-Somewhere Road, Jacksonville Florida 32257

Dear Sir:

In accordance with the federal and state hazardous waste regulations, My Company Inc. is required to notify you of our facility's hazardous waste activities. My Company Inc. is required to give local police, fire departments, hospitals, and state or local emergency response teams a layout of the facility, so they may become familiar with entrances to roads inside the facility, and possible evacuation routes. A copy of the facility layout is enclosed for your review and should be kept on file at your organization.

My Company Inc. is also required to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses that could result from fires, explosions, or releases at the facility. My Company Inc. deals with _____ waste, and this type of waste could cause _____ if an employee is exposed to it. A list of all the chemicals handled is maintained at the facility and a Material Safety Data Sheet for each can be supplied at your request.

We have also enclosed a copy of our emergency plan. The plan is designed to minimize hazards to human health and the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste to the air, soil or surface water. Please review and retain this plan in your files in the event of an emergency.

Thank you for your cooperation in this matter. Should you have any questions or desire to visit the facility, please contact me at (904) 999-9999.

Sincerely,

Bob Somebody
President
My Company Inc.

Enclosures

Sample Emergency Plan

My Company Incorporated
191 Somewhere Road
Jacksonville, Florida 32257

Emergency Coordinator: _____ (904) 999-9999

Jacksonville Fire Department: (904) 999-9999

CHEMTREC: (800) 424- 9300

Jacksonville Police Department: (904) 999-9999

Emergency Response: (904) 999-9999

Hospital: (904) 999-9999

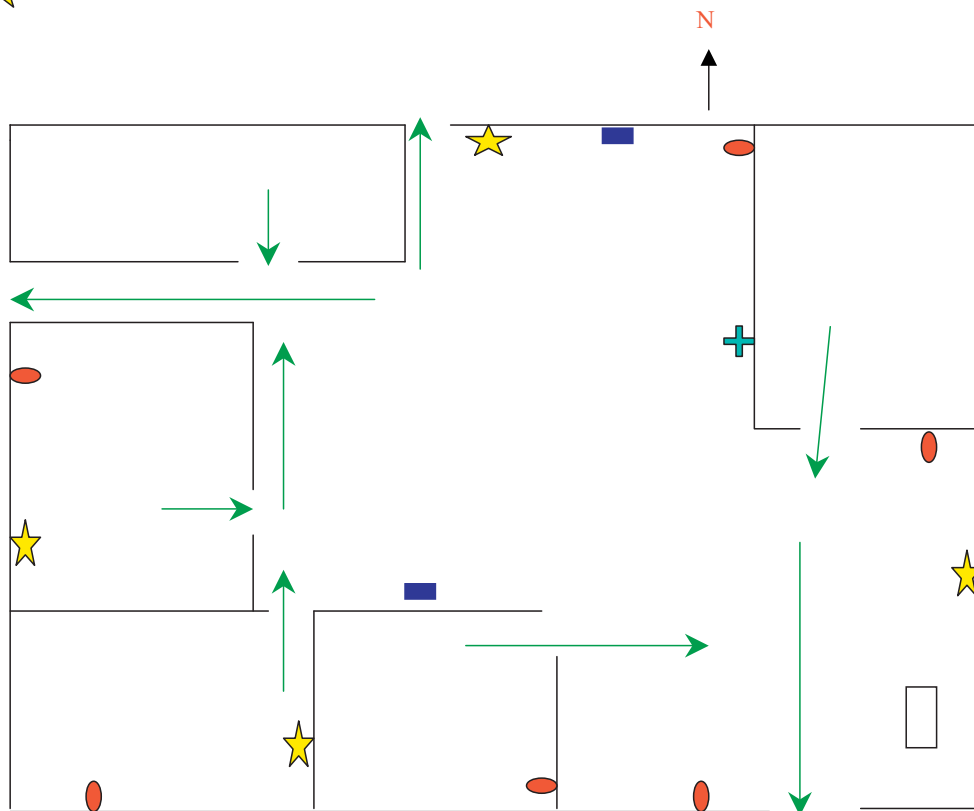
 FIRST AID KIT

 FIRE EXTINGUISHERS

 SPILL KITS

 EXIT ROUTES

 FIRE ALARMS



Appendix VI - How to Get and Use an EPA Identification (EPA ID) Number



An EPA ID number is a 12-character number that you obtain and use when you send hazardous waste off-site for treatment or disposal (using the Hazardous Waste Manifest discussed in Sections 3.5 and 4.5 of this Workbook). In Florida, FDEP issues EPA ID numbers.

EPA ID numbers are linked to a specific address, not a particular business. If your current location already has an EPA ID, because a previous business handled regulated hazardous waste, you will be assigned the same number after you notify FDEP that your shop now generates hazardous waste at this location. You cannot use an existing EPA ID number until your shop has received the number from FDEP. If your site does not have an existing EPA ID number, FDEP will assign you a new one.

All SQGS must get an EPA identification number. CESQGs are not required to get an EPA ID number. Some transporters of hazardous waste may request that a CESQG get an EPA ID.

HOW TO GET AN EPA ID NUMBER

Obtain a copy of Florida Notification of Regulated Waste Activity Form (8700-12FL)

- ▶ Call the EPA ID Notification Coordinator at (850) 245-8707; or
- ▶ Download and print the form and the instruction booklet from FDEP's web site at:
http://www.dep.state.fl.us/waste/quick_topics/forms/pages/62-730.htm.
 The form is a .pdf file. To read it you will need Adobe Acrobat Reader which can be obtained for free from Adobe at:
<http://www.adobe.com/products/acrobat/readstep2.html>; or
- ▶ Send a written request for the Florida Notification of Regulated Waste Activity Form to:

**EPA ID Notification Coordinator
 Hazardous Waste Regulation Section MS 4560
 Department of Environmental Protection
 2600 Blair Stone Road
 Tallahassee, Florida 32399-2400**
- ▶ Don't forget to request one copy of the form for each business site where you generate or handle regulated hazardous waste. You will be assigned a separate EPA ID number for each location.

2 Complete the Hazardous Waste Notification Form

- ▶ Complete the Hazardous Waste Notification Form by following the step-by-step instructions in the instruction booklet.

3 Submit Your Hazardous Waste Notification Form

- ▶ Make a photocopy of the form or save a copy on your computer for your records and future reference.
- ▶ Mail the completed form with original signature to the EPA ID Notification Coordinator at the address listed below.

**EPA ID Notification Coordinator
Hazardous Waste Regulation Section MS 4560
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400**

FDEP will send you a letter with your EPA ID number and your official generator status about two weeks after receiving your Notification Form.

4 Using Your EPA ID

You must use your EPA ID on all manifests when sending regulated hazardous waste for management and disposal. Sections 3.5 and 4.5 cover manifesting requirements and BMPs.

5 Times You Must Submit a New Hazardous Waste Notification Form (“Status Changes”)

Any time your hazardous waste generator status changes, you must submit a new Hazardous Waste Notification Form to FDEP. If any of the following items change, your generator status changes:

- Name of your shop;
- Ownership of your shop; or
- Location of your shop. If you move your business to another location you will get a new EPA ID—the old number stays with the old location.

If any of the following items change, your generator status may or may not change (Please contact FDEP for assistance):

- Type of regulated hazardous wastes you are generating;
- Amount of regulated hazardous wastes you are generating.

Appendix VII - Keep a Record of Compliance Self-Audits at your Shop

As mentioned earlier in this Workbook, a periodic review of your shop's waste management procedures will show a good faith effort on your part to stay in compliance. It is recommended that you perform a self-audit at least annually and document the results. During your self-audit, use the checklist that corresponds to this Workbook and keep that as a record in your file. Record your history of self-audits on this page and keep this Workbook as an easy reference.

Worksheet III - Documenting your Self-Audits

Year	Date of Self-Audit	Comments	In Compliance Yes/No	Manager's Signature
2011				
2012				
2013				
2014				
2015				
2016				
2017				

As time goes by, the rules and regulations on managing your shop's wastes may change. To keep up-to-date with changes in the laws, and for updates to this Workbook and extra checklists visit our web site for automotive repair shops at:

<http://www.dep.state.fl.us/waste/categories/hazardous/pages/AutomotiveCompliance.htm>

or contact FDEP. District office contacts are shown by county on the back of this publication, or call us at 850-245-8707.

Notes:

Florida Department of Environmental Protection (FDEP)

District Offices

Northwest District

160 Governmental Center
Pensacola, FL 32502-5794
850/595-8300

Northeast District

7825 Baymeadows Way
Suite 200B
Jacksonville, FL 32256-7590
904/807-3371

Central District

3319 Maguire Blvd.
Suite 232
Orlando, FL 32803-3767
407/894-7555

Southwest District

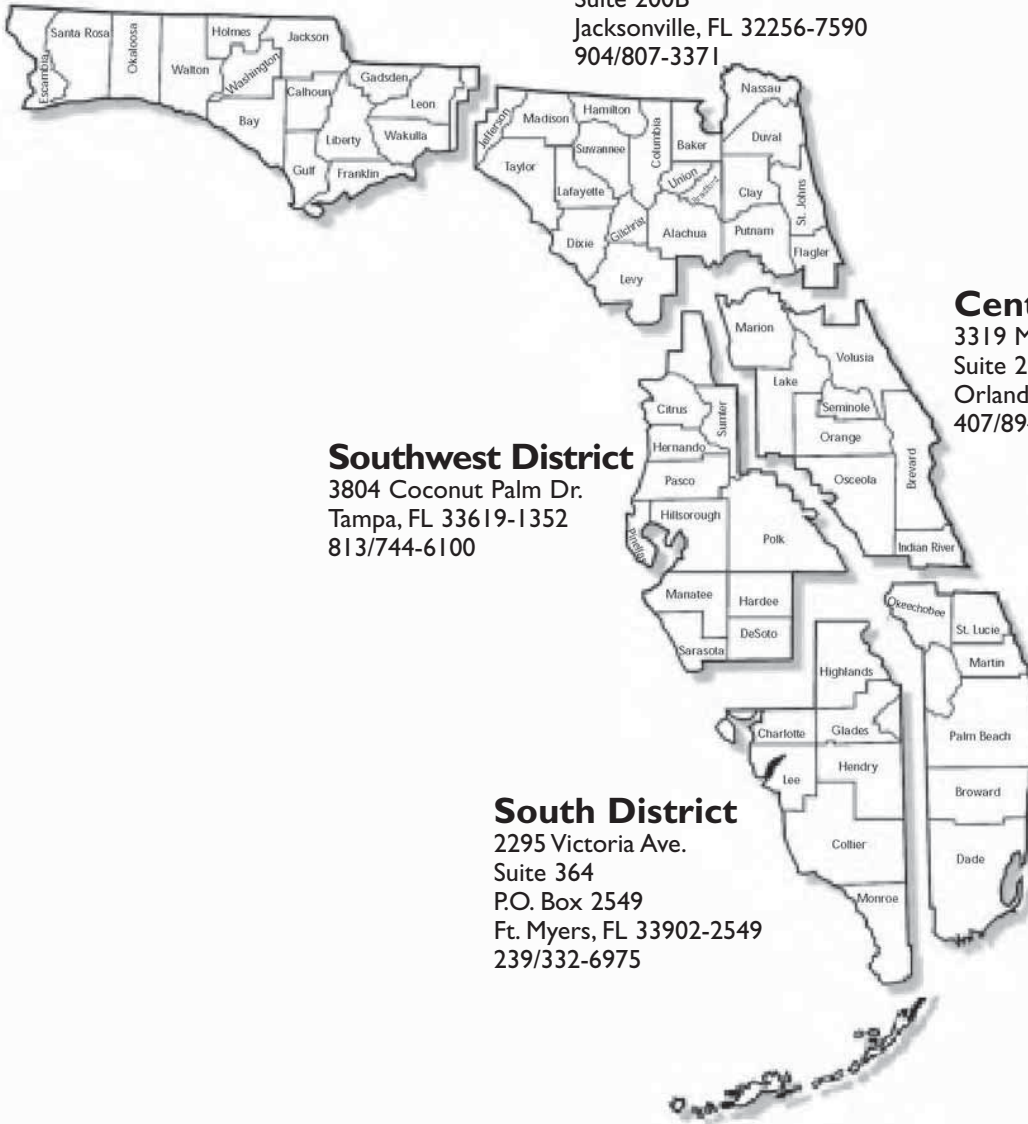
3804 Coconut Palm Dr.
Tampa, FL 33619-1352
813/744-6100

South District

2295 Victoria Ave.
Suite 364
P.O. Box 2549
Ft. Myers, FL 33902-2549
239/332-6975

Southeast District

400 N. Congress Ave.
Suite 200
West Palm Beach, FL 33401
561/681-6600



FDEP Hazardous Waste Regulation Section in Tallahassee:

2600 Blair Stone Road MS 4560
Tallahassee, FL 32399-2400
850/245-8707

<http://www.dep.state.fl.us/waste/categories/hazardous/pages/AutomotiveCompliance.htm>