Compliance Self-Audit Checklist

Instructions:

1. Please refer to the *Compliance Assistance Workbook* (the Workbook) as you complete each question on this checklist to ensure that you correctly answer each compliance question below.

2. Unless otherwise noted below, each question on this form is asking you to assess the current conditions and operations in your shop. Most compliance problems described in the Workbook can easily be corrected within a few days. **If you cannot answer that you are in compliance with a requirement during your self-audit, you are probably in violation of state or federal rules that could result in penalties if you are inspected.** Fix the problem as soon as you can and make a note on your compliance checklist of the specfic action that you took to return to compliance and the date. If you keep this record, you will be able to show an inspector that you took quick action to fix any problems.

3. Some of the compliance questions are broken down into several more specific questions. Be sure to answer all of these specific questions before answering the first question in that section. An example is question 15, where answering 15a-15d would be necessary before the first question could be answered.

4. Other compliance assistance resources can be found on-line at the web site below: http://www.dep.state.fl.us/waste/categories/hazardous/pages/AutomotiveCompliance.htm.

IMPORTANT NOTE: A **Shortcut Method** for identifying hazardous waste generated by auto repair shops was presented in Chapter 2 of the Self-Audit Workbook for auto repair shops, to help simplify the complex process of hazardous waste determination. The Worksheets on pages 11 and 12 of the Workbook can help with that 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 of that Workbook, may be used if you prefer to not 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 the Workbook.**

Compliance Checklist for (shop name):_____

Date Audit Was Completed:_____ Initials:_____

Compliance Checklist

CHAPTER 2.0. HAZARDOUS WASTE DETERMINATION AND FACILITY STATUS

Sections 2.1 through 2.4 - Hazardous Waste

1. Has your shop conducted a complete and accurate **hazardous waste determination** on each waste stream?
   Refer to page 9 in the Workbook for instructions on how to conduct a hazardous waste determination.

   ☐ **Yes** ☐ **No**
   You must complete the determination process before proceeding

2. Does your shop **generate hazardous waste**?
   Refer to pages 9 and 10 in the Workbook for an explanation of what materials are included in the regulatory definition of hazardous waste.

   ☐ **Yes** ☐ **No**
   Skip to Question 14

3. What is the **maximum** amount of hazardous waste your shop generates in any one month? This amount determines your shop's Hazardous Waste Generator Status (category).
   Refer to page 13 in the Workbook.
   3a. Put a check next to your generator status

   Enter number below: _____ ***Circle Correct Units:*** **Gallons** **Pounds**

   ☐ **CESQG** ☐ **SQG** ☐ **LQG**

4. Does your shop **mix hazardous waste with used oil**?
   Refer to page 14 in the Workbook.

   ☐ **Yes** ☐ **No**
   Skip to Question 5

   4a. If your shop mixes hazardous waste with used oil, is it required to be managed as a hazardous waste?

   ☐ **Yes** ☐ **No**
   Skip to Question 5

   4b. If you answer "Yes" to question 4a, do you manage the mixture of hazardous waste and used oil as a hazardous waste?

   ☐ **Yes** ☐ **No** - ***Corrective Action Taken***_____
   _____
   _____
   Date _____

CHAPTERS 3.0 AND 4.0 HAZARDOUS WASTE MANAGEMENT

Sections 3.1 and 4.1 - Container Management

5. Does your shop **store hazardous waste** on-site prior to treatment or disposal?
   CESQGs refer to page 15 in the Workbook.
   SQGs refer to page 27 in the Workbook.

   ☐ **Yes** ☐ **No**
   Skip to Question 8

6. Are all **containers holding hazardous waste** managed to prevent releases according to the requirements of your shop's generator status?
   CESQGs refer to page 17 in the Workbook.
   SQGs refer to page 29 in the Workbook.

   ☐ **Yes** ☐ **No** - ***Corrective Action Taken***_____
   _____
   _____
   Date _____

7. Does your shop comply with the **hazardous waste quantity and time accumulation limits** based on your shop's generator status?
CESQGs refer to page 17 in the Workbook.
SQGs refer to page 29 in the Workbook.

☐ **Yes**

☐ **No** - ***Corrective Action Taken***_____
_____
_____
Date _____

Sections 3.2 and 4.2 - Employee Training

Requirements for SQGs -- not required but Best Management Practices for CESQGs

8. Have your shop's employees received adequate **hazardous waste training** based on your shop's generator status?
CESQGs refer to page 19 in the Workbook.
SQGs refer to page 32 in the Workbook to answer questions 8a and 8b below.

☐ **Yes**

☐ **No**
If your shop is a SQG, Corrective Action Taken_____
_____
_____
Date _____

☐ **N/A**
Not Required if your shop is a CESQG.

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 the Workbook's Regulatory Requirements?

☐ **Yes**

☐ **No**
Fix the problem.

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

☐ **Yes**

☐ **No**
Fix the problem.

Section 3.3 and 4.3 - Spills and Leaks

9. **Over the last 12 months**, have your hazardous materials been on **fire**, **exploded**, or **released** to the environment?
CESQGs refer to page 21 in the Workbook.
SQGs refer to page 34 in the Workbook.

☐ **Yes**

☐ **No**
Skip to Question 10

9a. 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?

☐ **Yes**

☐ **No** - ***Corrective Action Taken***_____
_____
_____
Date _____

Section 3.4 and 4.4 - Emergency Preparedness

Requirements for SQGs -- not required but Best Management Practices for CESQGs

10. Does your shop have required **safety and decontamination equipment**, based on your generator status?
CESQGs refer to page 23 in the Workbook.
SQGs refer to page 37 in the Workbook.

☐ **Yes**

☐ **No**
If your shop is a SQG, Corrective Action Taken_____
_____
_____
Date _____

☐ **N/A**
Not Required if your shop is a CESQG.

11. Is there a list posted near the telephone with all required **emergency information**?
CESQGs refer to page 23 in the Workbook.
SQGs refer to page 37 in the Workbook.

☐ **Yes** ☐ **No** ☐ **N/A**

If your shop is a SQG, Corrective Action Taken _____
_____
_____
Date _____

Not Required if your shop is a CESQG.

Sections 3.5 and 4.5 - Waste Disposal and Documentation

12. Is your shop **properly disposing** of all of its hazardous wastes to facilities authorized to accept the waste and **properly documenting** its disposal?
CESQGs refer to page 26 in the Workbook.
SQGs refer to page 40 in the Workbook.

☐ **Yes** ☐ **No** - ***Corrective Action Taken*** _____
_____
_____
Date _____

13. Does your shop **dispose of hazardous waste on-site** in a septic tank, storm drain, to surface water, to the ground, by burning, in a dumpster, or by evaporation?
CESQGs refer to page 26 in the Workbook.
SQGs refer to page 40 in the Workbook.

☐ **Yes** ***Corrective Action Taken*** _____
_____
_____
Date _____

☐ **No**

CHAPTER 5.0 COMMON AUTO REPAIR SHOP WASTES

Section 5.1 - Waste Batteries

14. Does your shop generate **waste car batteries**?
Refer to page 41 in the Workbook.

☐ **Yes** ☐ **No**
Skip to Question 16

15. Does your shop comply with **all requirements for waste batteries** as explained below? To mark "yes" you must answer "yes" to either question 15a or 15b AND answer "YES" to questions 15c and 15d below.
Refer to page 42 in the Workbook.

☐ **Yes** ☐ **No** - ***Corrective Action Taken*** _____
_____
_____
Date _____

15a. If your waste batteries are recycled, do you keep records of your recycling **waste batteries** for three years?
Refer to page 44 in the Workbook.

☐ **Yes** ☐ **No**
Fix the problem.

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?
Refer to page 44 in the Workbook.

☐ **Yes** ☐ **No**
Fix the problem.

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?
Refer to page 42 in the Workbook.

☐ **Yes**

☐ **No** - ***Corrective Action Taken***_____
_____
_____
Date _____

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?

- ❑ 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.

Refer to page 42 in the Workbook.

☐ **Yes**

☐ **No** - ***Corrective Action Taken***_____
_____
_____
Date _____

Sections 5.2 and 5.3 - Used Oil and Oil Filters

16. Does your shop generate **used oil and/or used oil filters**?
Refer to page 43 in the Workbook.

☐ **Yes**

☐ **No**
Skip to Question 20

17. Does your shop properly **dispose of used oil** and properly **manage containers and tanks of used oil**? To mark "YES" to this question you must be able to answer "YES" to questions 17a-17d below.
Refer to page 46 in the Workbook.

☐ **Yes**

☐ **No** - ***Corrective Action Taken***_____
_____
_____
Date _____

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?

- ❑ If you mix any waste from Column B of Table 1, 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 1, 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 1, page 43, with used oil and the mixture has more than 1000 parts per million of total chlorine compounds, do you manage the mixture as hazardous waste?

☐ **Yes**

☐ **No**
Fix the problem.

17b. For transporting and disposing of your used oil, do you do one or more of the following only: ☐ **Yes** ☐ **No** ***Fix the problem.***

- ❑ 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? ☐ **Yes** ☐ **No** ***Fix the problem.***

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? ☐ **Yes** ☐ **No** ***Fix the problem.***

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18. Does your shop **dispose of used oil on-site**? This means disposing of used oil to a septic tank, storm drain, surface water, the ground, a dumpster, or by open burning. *Refer to page 46 in the Workbook.* ☐ **Yes** ***Corrective Action Taken***_____ _____ _____ ***Date*** _____ ☐ **No**

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19. Does your shop **manage containers of used oil filters** properly? To mark "YES" to this question you must answer "YES" to questions 19a-19d below. *Refer to page 49 in the Workbook.* ☐ **Yes** ☐ **No - *Corrective Action Taken***_____ _____ _____ ***Date*** _____

19a. Are your used oil filters stored in aboveground containers that do not leak? ☐ **Yes** ☐ **No** ***Fix the problem.***

19b. Are your used oil filter containers labeled with the words "Used Oil Filters?" ☐ **Yes** ☐ **No** ***Fix the problem.***

19c. Are your used oil filter storage containers closed or otherwise protected from weather? ☐ **Yes** ☐ **No** ***Fix the problem.***

19d. Are your containers stored on concrete or another surface that oil cannot pass through? ☐ **Yes** ☐ **No** ***Fix the problem.***

Section 5.4 - Used Antifreeze

20. Does your shop generate **used antifreeze**?
Refer to page 50 in the Workbook.

☐ **Yes** ☐ **No**
Skip to Question 22

21. Does your shop meet all requirements for **recycling and/or disposing of used antifreeze**?
Refer to page 51 in the Workbook.

☐ **Yes** ☐ **No** - ***Corrective Action Taken***_____
_____
_____
Date _____

Section 5.5 - Used Fluorescent and HID Light Bulbs and Mercury Switches

22. Does your shop comply with all requirements for **fluorescent/HID light bulbs and mercury switches**?
Refer to page 55 in the Workbook.

☐ **Yes** ☐ **No** - ***Corrective Action Taken***_____
_____
_____
Date _____

Sections 5.6 and 5.7 - Waste Tires and Solid Waste

23. Does your shop generate **waste tires**?
Refer to page 56 in the Workbook.

☐ **Yes** ☐ **No**
Skip to Question 24

24. Does your shop comply with requirements for **waste tires**?
To mark "YES" you must answer: YES to questions 24a-24e below, or NO to question 24a and YES to questions 24c-24e below.
Refer to page 58 in the Workbook.

☐ **Yes** ☐ **No** - ***Corrective Action Taken***_____
_____
_____
Date _____

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

☐ **Yes** ☐ **No**
Fix the problem.

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

☐ **Yes** ☐ **No**
Fix the problem.

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

- 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?

☐ **Yes** ☐ **No**
Fix the problem.

24d. Do you send your waste tires to a facility authorized to manage waste tires?	☐ **Yes**	☐ **No** ***Fix the problem.***
24e. Do you keep records of your waste tire disposal?	☐ **Yes**	☐ **No** ***Fix the problem.***
25. Does your shop comply with requirements for **solid waste**? *Refer to page 60 in the Workbook.*	☐ **Yes**	☐ **No** - ***Corrective Action Taken***_____ _____ _____ ***Date*** _____

Section 5.8 - Industrial Wastewater

26. Does your shop generate **industrial wastewater**? *Refer to page 61 in the Workbook.*	☐ **Yes**	☐ **No** ***You have completed the self-audit.***
27. Does your shop meet requirements for handling **industrial wastewater**? *Refer to page 63 in the Workbook.*	☐ **Yes**	☐ **No** - ***Corrective Action Taken***_____ _____ _____ ***Date*** _____