

## Auto Body Repair Facilities

### Best Management Practices for Hazardous Materials/Waste Handling

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Best Management Practices (BMPs) should be thought of as “good housekeeping” practices. In the auto body repair industry, you may have some waste streams regulated as hazardous waste by federal & state laws. Many of these waste streams could be considered nonhazardous if properly disposed. Disposal of hazardous waste in solid waste (trash) or down the drain is not permitted. Listed below are typical waste streams, along with procedures to help you comply with these regulations and help reduce the liabilities associated with noncompliance.

**Automotive Repair and Service:** All services performed by an automotive repair and service establishment, including repair, painting and body work activities, must be performed within a completely enclosed building. Providing estimates for work to be completed or performing minor repair services, such as replacement of windshield wiper blades, automobile batteries, and light bulbs are excluded from this provision. Whenever an automotive repair and service establishment is within 75 feet of a residential use, all refuse and vehicle parts must be stored within a completely enclosed area (Lee County Land Development Code §34-1351).

**Waste Determination:** A waste determination must be made prior to the disposal of any waste in order to identify hazardous wastes generated. Making a correct hazardous waste determination is important, and failure to make this determination is one of the most common violations found.

**Safety Data Sheets** (SDS) contain information that can be used to make these determinations, including components and contaminants, and hazardous waste characteristics. A solid waste is a hazardous waste if it is specifically listed as a known hazardous waste or meets the characteristics of a hazardous waste. Listed wastes are wastes from common manufacturing and industrial processes, specific industries, and can be generated from discarded commercial products. Listed wastes can be found by searching EPA’s RCRA regulations (40 CFR Part 261, Subpart D). Characteristic wastes are wastes that exhibit any one or more of the following characteristic properties: ignitability, corrosivity, reactivity or toxicity. The SDS will contain information on hazardous characteristics in sections 2 and 9 for that chemical/product.

**Labeling:** Waste containers for hazardous waste must be marked with the words “Hazardous Waste,” the accumulation start date, and the hazards of the contents (§40 CFR 262.14(a)(5)(viii)), including characteristic pictogram labels.

**Record Keeping:** All records for disposal or recycling of any hazardous or regulated waste must be kept for three years and readily available for inspectors to review. This includes any test results or other documentation showing a waste is hazardous or nonhazardous.

### Types of Regulated Waste Streams:

#### **Paint Waste**

This type of waste stream can be reduced by ordering the least amount of material needed to perform the job. When you have left over paint from this industry, it could be Hazardous Waste due to the reducers, thinners, hardeners, and heavy metals (metallic paint) contained in the material. Avoid paints that contain heavy metals. Manufacturers have made products utilizing metallic elements without regulated metals. Check the SDS for these heavy metals to avoid them (arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver). Using the excess paint for primer on non-essential parts can reduce the amount of waste for disposal.

## Paint Thinners

This waste stream is regulated under Federal & State regulations. You must capture any thinner waste from cleaning spray guns and equipment, and place it into a closed-lid, labeled container for disposal or recycling. If you choose to recycle this waste, it must be calculated into your waste stream totals before it is recycled. The benefits of recycling will save you money in purchasing new product, and the disposal of excess Hazardous Waste. The initial cost of the distillation unit can be recouped fairly rapidly depending on the amount of paint waste that is generated monthly. For Small Quantity Generators (SQGs) (generates 220-2200 pounds hazardous waste monthly), distillation units can reduce your generator status, and save you time and money in compliance costs. The “still bottoms” generated from the recycling process will need to have a waste determination performed on them before the disposal method can be determined.

Here are several steps that can be followed that will reduce waste disposal amounts.

- (1) Any thinner waste from cleaning guns or measuring sticks should be put into a closed container and allowed to settle.
- (2) Once the sludge has settled, gently pour off the clear liquid into another container. The clear product can be reused for gun cleaning.
- (3) Pour only sludge that cannot be reused into your distillation unit or drum.

## Paint Booths and Paint Booth Filters

Paint booths are required for indoor commercial painting and must meet local building standards and Florida DEP air permit regulations. Fire Marshals may have additional requirements for paint booths used in your area.

Paint booth filters collect aerosolized paints, coatings, and overspray, preventing it from being discharged to the environment. These filters can become hazardous waste depending on the type of operations, work practices, and the products in use. A waste determination is required for spent paint booth filters and can be done through product and process knowledge or analysis. If the business owner/operator or the paint supplier/vendor reviews the SDS on the paint products being used and determines they do not contain toxic RCRA heavy metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver), then the waste determination has been done. If a waste determination cannot be made with product knowledge, then a representative sample of a spent filter (at the point the filter needs to be changed out) would need to be analyzed for heavy metals via EPA Test Method 1311, the Toxicity Characteristic Leaching Procedure (TCLP) by a testing laboratory. Once this waste determination has been made, keep records of this on file, whether the waste is determined to be hazardous or not. The business needs to complete a new waste determination when a product or process is changed. In general, it is recommended to repeat a waste determination every three years regardless of any process change. If paint booth filters are determined to be hazardous, all records for disposal or recycling must be kept for three years and readily available for inspectors to review. **Do Not** clean paint guns by filling with thinner and blowing out the waste from the gun cleaning process into the paint booth or filters. If this process is utilized, the paint booth filters will likely need to be disposed of as hazardous waste.

Refer to the table below to determine if a solvent being used is a listed hazardous waste. A common example of an F005 solvent is lacquer thinner, as it frequently contains toluene and methyl ethyl ketone.

<b>Waste Code</b>	<b>LISTED HAZARDOUS WASTES (40 CFR 261 Subpart D) Hazardous wastes from non-specific sources</b>
F001	Spent halogenated solvents <b>used in degreasing</b> , such as trichloroethylene, methylene chloride, 1,1,1- trichloroethane, and carbon tetrachloride
F002	Spent halogenated solvents, such as those above, but <b>not used as degreasers</b> ; other examples are 1,1,2-trichloro-1,2,2-trifluoroethane and chlorobenzene
F003	Spent nonhalogenated, <b>ignitable-only solvents</b> , such as xylene, acetone, methanol, and methyl isobutyl ketone
F004	Spent nonhalogenated solvents, such as cresols, cresylic acid, and nitrobenzene
F005	Spent nonhalogenated solvents, such as toluene, methyl ethyl ketone, carbon disulfide, and benzene; Spent solvent mixtures/blends containing 10% before use of F001, F002, F004 and/or F005; and solvent distillation bottoms

## **Batteries**

Lead Acid Batteries need to be stored on an impervious surface, in an area shielded from the weather. Best Management Practices recommend that batteries be stored indoors, on a battery rack or wooden pallet over acid-resistant material. If any cores are missing caps or are cracked, place them in an acid-resistant plastic container, along with neutralizing material for leak absorption. Prevent acid from reaching soil and surface waters. If batteries are exchanged with a battery supplier or retailer for core credit, ensure that the number of cores or pounds removed is documented on a **receipt**. Used cores can also be disposed of via a scrap metal dealer. Again, secure a **receipt** noting the number of cores or pounds that were recycled. All records for disposal or recycling must be kept for three years and readily available for inspectors to review. When batteries are recycled, they are not counted towards your facility's hazardous waste totals.

**Tire pressure monitoring devices** contain a lithium-ion battery, which must be properly recycled. The company that collects battery cores and metal scrap companies are potential options for recycling. Do not dispose of tire pressure monitoring devices with solid waste.

## **Aerosol Cans and Cleaners**

Many different kinds of aerosol cleaners promise they are "environmentally friendly". Read the label and consult the SDS for the listing of active ingredients. If any of the ingredients contain the word "chlor", the aerosol contains chlorinated solvents.

**Chlorinated solvents are one of the main regulated ingredients in aerosol cleaners. Avoid using chlorinated cleaners. They can cross-contaminate other waste streams.** Products may contain other regulated ingredients, so read labels and SDS carefully.

Once an aerosol can is "empty", by federal definition, it can be disposed of in your normal trash. The definition of "empty" is the point at which the atmospheric pressure inside the can is the same as the pressure outside the can, with all material dispersed. One option is purchasing cleaners in bulk and using reusable containers. These reusable containers can be pressurized with your own air compressor. This will save cost in purchase of materials and reduce the number of disposed containers. If an aerosol container cannot be emptied, it must be treated as either hazardous or universal waste if any regulated material remains inside. Please refer to the **Aerosol Can Management** handout for further information on disposal options, along with storage and labeling requirements.

## **Absorbent Material**

Absorbent materials are needed when spills occur. The types and amounts of spilled material will determine how you need to store, label, and dispose of the absorbent material used. Use rags provided by your rag service for small spills, drips, and/or dribbles. Absorbent mats or loose/granular absorbents should be used for large and/or emergency spills. Absorbents used to clean spills of hazardous substances will be considered hazardous waste and therefore will need to be disposed of accordingly. Store spent absorbents in a labeled, closed-lid container. Oily absorbents can be picked up by a used oil hauler; absorbents containing hazardous chemicals must be disposed of as hazardous. If you have further questions about this waste, please call to verify proper disposal.

## **Shop Rags**

The substance being absorbed by the rags will dictate disposal requirements; if the substance is a regulated or hazardous waste, the rags must be disposed of accordingly. An alternative to disposable rags is to contract a uniform service that provides and launders reusable shop rags. Contracting with a company that will supply clean rags on a regular basis is a good way to avoid improper disposal of regulated or hazardous waste. Do not wash shop rags yourself if they are used for a regulated or hazardous substance (i.e. used oil, solvents); washing must be done through a commercial laundry service. These contractors are permitted by state and local agencies to wash the rags, which are considered recyclable items.

Used rags should be placed into a closed-lid container, which is properly **labeled** for the rag service. They will then pick up and launder the rags. **Receipts** for this service will serve as disposal documentation. Use shop rags instead of absorbent for small drips and dribbles. **Do not mix rags together with different waste into the same storage container**, as they may be reactive to one another and become a fire hazard. If applicable, your inspector will provide BMPs for Solvent-Contaminated Wipes.

## **Mercury-Containing Switches**

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 recycled, mercury switches are not treated as hazardous waste or counted toward generator status. These switches are required to be properly stored and labeled while onsite and awaiting pickup for recycling. **Mercury containing switches cannot be disposed of in solid waste.**

## **Do's and Do Not's**

- **Do not** store incompatible waste together.
- **Do not** use any chlorinated solvents.
- **Do not** use one container as the "catch-all" for all fluid draining procedures. This can cause cross-contamination of waste.
- **Do not** store any materials/waste near storm drains, ditches, creeks, rivers, canals, or any bodies of water that would be contaminated if a spill occurs.
- **Do not** throw away receipts that show your disposal of waste materials. All records for disposal or recycling must be kept for three years and readily available for inspectors to review. This includes contracts with hazardous waste haulers.
- **Do not** mix any waste with another waste. Mixing can cause a regulated waste to become a hazardous waste (example: mixing other waste into used oil). **Check with your used oil hauler for what is acceptable to mix together into the bulk used oil container. Get this in writing from your hauler!** **Do not** dispose of any material into your septic system, sanitary sewer, or storm sewer. If you want to do this you must have written permission from the Regulatory agency that permits that particular system.
  - Septic System: Department of Health and Rehabilitative Services
  - Sanitary Sewers: the utility district in which your facility is located
  - Storm Sewer: Department of Environmental Protection AND the county or city that manages the Municipal Separate Storm Sewer System (MS4)
- **Do** keep Safety Data Sheets on file for products used. Keep in mind that the process in which you use the material may contaminate the product and cause the resulting waste to be regulated (i.e. equipment degreasing and rinsing).
- **Do** store hazardous waste **inside** designated containment/storage areas. Make sure all containers are properly labeled (include dates where necessary) and container lids are closed/secured.
- **Do** promptly ask any questions you have when it comes to managing your hazardous waste streams.



**If you have any questions, please call the Division of Natural Resources Management, Pollution Prevention (P<sup>2</sup>) Program at (239) 533-8821.**

These Best Management Practices have been prepared by the P2 Program to summarize requirements related to this industry, but are not intended as a substitute for Florida Administrative Code Chapter 62-730: Hazardous Waste or to be a complete reference to all applicable regulations.