

Vehicle Maintenance and Auto-Body Repair Self Assessment

This self assessment checklist can help you improve the environmental management of your business. Use the checklist to see how you are doing with regulatory compliance, waste reduction, recycling and to start an environmental management system (EMS).

The checklist is designed primarily for small businesses with the typical air emissions associated with this industry, minimal waste water/storm water issues and for small and very small quantity generators of hazardous wastes. Larger shops may have significant additional regulatory requirements. The checklist focuses on three main common areas of environmental regulation.

1. Air emissions
2. Solid waste
3. Waste water and storm water

A few other requirements are included in the checklist for your information but won't apply to most vehicle maintenance and auto-body facilities. We also provide some common training requirements as well as many additional resources including DNR publications and examples of forms that can be used. Finally we provide other state resources and web sites that have good publications for your industry after the checklist.

What Laws Apply to You?

Wisconsin law applies to all or nearly all of your regulatory requirements. In rare cases, such as a Federal MACT standard, EPA may regulate. Links are provided in the checklist as a starting point in the Department of Natural Resources regulatory pages.

You can find all Wisconsin Statutes and Administrative Codes at

Wisconsin Statutes

<http://www.legis.state.wi.us/rsb/stats.html>

Wisconsin Administrative Codes

<http://www.legis.state.wi.us/rsb/code/>

If you have questions or need help understanding which regulations apply to you, call us or we can come to your shop and do a free on-site visit to help you with understanding regulatory compliance and provide waste reduction and recycling ideas to save money.

We can provide a *Small Business EMS Template* that you can use without having to start from scratch. To learn more about Small Business EMS, click on the following:

[Environmental Management Systems for Small and Medium Sized Businesses](#)

If you need any information or assistance concerning your environmental program, just contact jannis@uwsp.edu or call 715-346-2793 or go to our web site at this address <http://www.uwex.edu/shwec> to contact any of our Staff.

Print a paper copy of the assessment checklist to use. Mark Yes or No and make notes where there is a correction to be made, an action to be taken or some other reason for a note. If the checklist item does not apply to your business mark (N/A).

Contact jannis@uwsp.edu 715-346-2793 if you have any questions or cannot print.

Vehicle Maintenance and Autobody Repair Shop Environmental Checklist

Environmental Issue	Yes	No	N/A, Unknown, Comments
<p><i>Air Emissions NR 400-499</i> The condensed list of Wisconsin Administrative Codes http://www.dnr.state.wi.us/org/aw/air/reg/nr400toc.htm The DNR Air Management Program http://www.dnr.state.wi.us/org/aw/air/ The DNR Air Pollution Regulations Page http://www.dnr.state.wi.us/org/aw/air/reg/</p>			<p>Note! Other publications and resources are provided after the checklist</p>
Do we collect information on how much coating, solvent, thinners, cleaners and prep materials we use <u>each month</u> ?			
Using the <u>monthly</u> information, Do we generate air emissions of VOC, HAP or other air pollutants in sufficient amounts to require an air permit?			
Do we have an air permit or applied for one as a result of our air emissions?			
Is our air permit current if one is required?			
Do we submit an Air Emissions Inventory to the DNR each year if required?			
Do we have proof of exemption if we do not need a permit? See the Commerce publication in the notes column →→→			<p>ftp://commerce.wi.gov/MT-CA-Operation Permits.pdf and ftp://commerce.wi.gov/MT-CA-AutobodyExempt.pdf</p>
Are we required to do any stack testing or other air emission testing?			
Have we obtained a construction or other temporary permit if we are moving or installing new equipment?			
Are all emission control devices (usually paint booths) maintained and monitored in accordance with the air permit if required?			
Are all inspections of control devices completed if required?			
Is training, related to application of coatings, use of solvent, or thinners or control devices completed if required?			
Are material safety data sheets available in the shop for any potentially hazardous materials?			
Do we remove or install automobile or other refrigerants such as Freon?			
Are we licensed, trained and equipped to do so?			
Do we keep detailed collection data on the Freon?			

Environmental Issue, air emissions continued	Yes	No	N/A, Unknown, Comments
Have we considered the following options for reducing air emissions?			
a. Use coatings, prep-coats, primers, sealers or other chemicals with low or no VOC, Toxicity, Hazardous Air Pollutants?			
b. Paint mixing or metering devices to reduce emissions?			
c. High efficiency spray guns to reduce emissions?			
d. Painter training for the most efficient spray application?			
e. Aqueous or other low emission solvents for cleaning, degreasing, surface preparation?			
f. Solvent reduction and recycling through distillation			
g. Replacement of inefficient spraying booth or area?			
h. Keeping Containers tightly closed to prevent air release			
Environmental Issue	Yes	No	N/A, Unknown, Comments
<p>Solid Waste Management NR 140-690 and NR 706 The condensed list of Wisconsin Administrative Codes http://dnr.wi.gov/org/aw/wm/information/wiacssh.htm</p> <p>The DNR Guidance documents and other publications http://dnr.wi.gov/org/aw/wm/publications/index.html#hazard</p> <p>NR Chapter 600 Review this document for definitions and other information concerning hazardous waste</p>			<p>Note! Other publications and resources are provided after the checklist</p>
Have we identified and characterized <u>every</u> waste to determine if it is hazardous or non-hazardous solid waste? NR 605			
Are there any "acute" hazardous wastes generated at this facility that could cause us to become an LQG? →→→→→			You can become a large quantity generator (LQG) by disposing of 2.2 lbs of acute hazardous waste in one month
Do we know the generator status of our facility? NR 610 <ul style="list-style-type: none"> • VSQG Generating less than 220lbs/month and storing no more than 2,205 lbs • SQG Generating 220lbs to less than 2,205 lbs/month and storing no more than 13,230 lbs • LQG 2,205 lbs or more each month NR 615 →→→→→ 			If an LQG seek additional assistance as there are many more requirements

Environmental Issue, solid waste continued	Yes	No	N/A, Unknown, Comments
What documentation is used for waste characterization? <ul style="list-style-type: none"> • Laboratory Analysis(TCLP) • Comparing MSDS against NR 605 →→→→→ • Product or vendor information • Other generator knowledge such as past records 			Material safety data sheets must be available for any hazardous materials
If our company is a VSQG have we completed the following minimum tasks identified in NR 610 ? <ol style="list-style-type: none"> 1. Waste determination characterization? 2. Obtained and EPA ID Number if manifesting? 3. Marked the date of first accumulation on waste collection container/drum? 4. Package waste to Meet D.O.T. requirements prior to shipment and have D.O.T. training done? 5. Use a licensed waste transporter unless waived? 6. Use a licensed or exempt TSDf-disposal company? If an SQG, have we completed the following as in NR 610 ? <ol style="list-style-type: none"> 1. Annual Report of Hazardous Waste Activities? 2. Certification of hazardous waste minimization? 3. Waste Manifests and other shipping documentation including return manifest copies for 3 years? 4. Land Disposal Restriction (LDR) records on hand for 5 years if needed? NR 675 5. Training documentation for employees in any way involved with hazardous waste handling/packaging? 6. Inspection documentation for any hazardous waste collection, storage, containers or areas? 7. Safety preparation and prevention planning done? 8. A modified emergency contingency plan in place? 			
Do we use "Satellite Accumulation" as described in NR 610 ?			
Is our hazardous waste stored safe and secure in a storage area that will prevent any release to the environment?			

Environmental Issue, solid waste continued	Yes	No	N/A, Unknown, Comments
Used Oil NR Chapter 590 and Guidance Documents →→→→→			DNR Used Oil Management Guidance http://www.dnr.state.wi.us/org/aw/wm/publications/hazard/wa_233.pdf
Is used oil collected and recycled from our shop?			
Is there documentation to show how used oil is recycled?			
Are used oil collection containers and tank clearly marked for “Used Oil Only” and segregated from other waste.			
Are oil filters punctured, hot-drained of oil?			
Do we use well designed drip pans to collect all oil?			
Do we use rags, socks, pads and squeeze out the oil instead of loose adsorbent materials which create waste?			
If we burn used oil for energy recovery is our oil burner of the type approved for use by the DNR?			
If we burn oil for energy recovery do we have a procedure to prevent burning of any unauthorized fuels in this device?			
Do we have procedures in place for spill reporting-NR 706? http://www.legis.state.wi.us/rsb/code/nr/nr706.pdf			
Are spill clean-up materials readily available for use and personnel trained on how to use them?			
Do we have reporting telephone number posted? Wisconsin Spill Reporting Hotline at 1-800-943-0003 National Response Center at 1-800-424-8802			
Are we required to have a Spill Prevention Control Countermeasures Plan? →→→→→ http://www.epa.gov/oilspill/spcc.htm			This is not likely unless storing large amounts of oil or petroleum products
Universal Waste NR 690 & Guidance Documents cover these materials as universal wastes in Wisconsin →→→→→ Antifreeze----- Fluorescent lamps----- Vehicle switches containing mercury----- Other mercury containing devices----- Batteries other than Lead acid----- Computers and monitors-----			The DNR published this guidance document in 2004 adding antifreeze and other materials as Universal Waste http://www.dnr.state.wi.us/org/aw/wm/publications/hazard/unvwaste204.pdf NR 690 will be revised to reflect this
Does the company have documentation demonstrating how universal waste is recycled or disposed of at this facility?			
Are used fluorescent lamps stored properly to prevent breakage resulting in possible hazardous waste?			
Are our antifreeze collection containers or drums marked “Antifreeze Only” and stored properly to prevent spills?			
Do we have any PCB’s to manage?			NR157 http://www.legis.state.wi.us/rsb/code/nr/nr157.pdf
Do we have any asbestos to manage?			NR 447 http://www.dnr.state.wi.us/org/aw/air/reg/asbestos/

Environmental Issue, solid waste continued	Yes	No	N/A, Unknown, Comments
Recycling Do we recycle the materials that are banned from landfill as described in Wisconsin Statute 287 Sub Chapter II? http://www.legis.state.wi.us/statutes/Stat0287.pdf →→→→			Tires, Used Oil, Aluminum, Glass, Steel and Plastic containers, Bi-metal steel/aluminum containers, Appliances Office paper, Magazines, Newspaper Corrugated paper and container board and yard wastes
Do we have recycling bins and collection points available and marked for each material?			
Do we have documentation to show what and how much we recycle at our shop?			
Are lead acid batteries recycled as required?			
Are oil filters recycled? →→→→			Not required as of this writing but may be banned from landfill
Pollution Prevention and Waste Reduction Options			
Have we considered the following materials, equipment or procedures to reduce waste and prevent pollution?			Note Additional resources with ideas for pollution prevention, waste reduction and recycling are after the checklist
a. Solvent recycling through filtration or distillation? →→→→			Filters and distillation still bottoms will create hazardous waste but minimal
b. High efficiency spray guns to reduce paint waste?			
c. Enclosed paint gun cleaner to reduce solvent waste?			
c. Paint mixing or metering equipment to reduce waste?			
d. Dry stripping with blast materials instead of chemicals?			
e. Maintaining a minimal inventory of paints which shelf life may expire causing hazardous waste?			
f. Hot soap washers for large parts washing and degreasing engine blocks, wheels larger parts? →→→→			May require approval to dispose of aqueous solution to sewer
g. Aqueous cleaners for small parts washing and degreasing? →→→→			May require approval to dispose of aqueous solution to sewer
h. Filtration systems on aqueous parts washers of all sizes to extend cleaning solution life? →→→→			May require approval to dispose of aqueous solution to sewer
i. Discontinue the use of any halogenated solvents?			
j. Use terpene or di-limonene cleaners and degreasers?			
k. Contract radiator cleaning and repair to a shop with waste water treatment system?			
l. Recycle anti-freeze on-site in our own equipment?			
m. Recycle aerosol cans and steel paint cans?			
n. Use refillable aerosol or spray cans?			

Environmental Issue	Yes	No	N/A, Unknown, Comments
<p>Waste Water and Storm Water NR100-299 Waste Water General Prohibitions which apply to all Shops NR 211 http://www.legis.state.wi.us/rsb/code/nr/nr211.pdf Types of Waste Water permits http://www.dnr.state.wi.us/org/water/wm/ww/PMTTYPES.HTM</p> <p>Storm Water Regulation DNR Storm Water Page http://www.dnr.state.wi.us/org/water/wm/nps/stormwater.htm NR 216 2004 Rev http://www.dnr.state.wi.us/org/water/wm/nps/rules/nr216/nr216_revisions.htm</p>			<p>Note! Other publications and resources are provided after the checklist</p>
Does the company have any waste water discharges to the sewer other than sanitary discharge from rest rooms?			
Does the company comply with best management practices (BMP) that prevent prohibited discharges under NR 211.10			
Have we checked with the local waste water treatment plant to see if a waste water permit or other requirements such as local limits for oil in wastewater apply to us?			
Do we cap drains to prevent oil, antifreeze or other discharges to the sewer or storm sewer?			
Do we do dry clean-up of maintenance bays, paint sanding, stripping areas to prevent discharge of toxics?			
Do we use drip pans whenever and wherever it is possible to have a spill of oil, antifreeze or other to the sewer?			
Do we collect pit or sump sludge, analyze and dispose of the sludge properly as required by solid waste regulations?			
If we have a car wash is that system permitted for operation if required and have we accomplished the same BMP's			
Are we required to have a storm water permit? http://www.legis.state.wi.us/rsb/code/nr/nr216.pdf			
Do we need a storm water pollution prevention plan?			
Have we implemented best management practices to prevent, clean, filter or collect storm water run-off?			
<p>Typical Training Requirements for Vehicle Maintenance and Autobody Shops</p>			
<p>Is training completed and current for these if they apply?</p> <p>Painter proficiency training----- Hazardous Waste Handling-Packaging----- Respirator Fit & Function Training----- Hazardous Communication----- HazWoper----- D.O.T. Training for Waste Packaging----- General OSHA Safety Training</p>			<p>Internal NR 610 OSHA 29 CFR 1910.1200 29 CFR 1910.120 paragraph (q) 49CFR and NR 610 OSHA</p>

Additional Resources and Publications to Support Your Assessment

Air Emissions

The Wisconsin Department of Commerce, Small Business Clean Air Assistance Program provides detailed assistance with air emission requirements. Extensive electronic file of easy to understand publications relating to all aspects of air compliance issues such as hazardous air pollutants, air permits, exemption from air permits and Federal MACT/RACT rules <http://www.commerce.state.wi.us/MT/MT-CA-sbcaap.html> or their publications at <http://www.commerce.state.wi.us/BD/BD-CA-pubs.html>

Hazardous Waste

WI-DNR Hazardous Waste Program Internet Page

<http://www.dnr.state.wi.us/org/aw/wm/hazard/>

What is a Hazardous Waste?

http://www.dnr.state.wi.us/org/aw/wm/publications/hazard/wa_106.pdf

Determination of Hazardous Wastes

http://www.dnr.state.wi.us/org/aw/wm/publications/hazard/wa_204.pdf

EPA Identification Number Form

http://www.dnr.state.wi.us/org/aw/wm/publications/hazard/wa_101.pdf

Hazardous Waste Manifests

http://www.dnr.state.wi.us/org/aw/wm/publications/hazard/wa_102.pdf

Transporting Hazardous Waste

http://www.dnr.state.wi.us/org/aw/wm/publications/hazard/wa_137.pdf

Hazardous Waste Inspection Requirements

http://www.dnr.state.wi.us/org/aw/wm/publications/hazard/wa_098.pdf

Hazardous Waste Training Requirements

http://www.dnr.state.wi.us/org/aw/wm/publications/hazard/wa_099.pdf

Recycling Hazardous Waste

http://www.dnr.state.wi.us/org/aw/wm/publications/hazard/wa_191.pdf

Avoiding Common Hazardous Waste Violations

<http://www.dnr.state.wi.us/org/aw/wm/publications/hazard/wahw850.pdf>

Hazardous Waste Transportation

http://www.dnr.state.wi.us/org/aw/wm/publications/hazard/wa_137.pdf

Very Small Quantity Generator Summary

<http://www.dnr.state.wi.us/org/aw/wm/publications/hazard/wa295-03.pdf>

Small Quantity Generator Summary

<http://www.dnr.state.wi.us/org/aw/wm/publications/hazard/wa294-03.pdf>

Other Regulatory Associated Resources

National Automotive Compliance Assistance Center operated by CCAR
<http://www.ccar-greenlink.org/>

OSHA Autobody and Finishing Site
<http://www.osha-slc.gov/SLTC/autobody/index.html>

Automotive Refinishing Publications--US-EPA Design for the Environment
<http://www.epa.gov/dfepubs/index.htm#auto>

The Wisconsin Department of Natural Resources provides assistance to your industry through Business Sector Specialists from the Bureau of Cooperative Environmental Assistance. Visit their web page which is designed specifically for the automotive business sector at: <http://www.dnr.state.wi.us/org/caer/cea/assistance/auto/>

Waste Reduction and Pollution Prevention Resources

The following selections provide excellent publications, web pages and information related to your industry that can help you eliminate or reduce waste and pollution.

Vehicle Maintenance Manual Iowa Waste Reduction Center
<http://www.iwrc.org/pubs/vmm.pdf>

Vehicle Maintenance Minnesota Technical Assistance Program
<http://mntap.umn.edu/vehicle/prevention.htm>

Vehicle and Fleet Pollution Prevention Fact Sheets from US-EPA Region 9
http://www.epa.gov/region09/cross_pr/p2/autofleet/factfleet.html
http://www.epa.gov/region09/cross_pr/p2/autofleet/factauto.html

US-EPA Office of Pollution Prevention Topics Page
<http://www.epa.gov/opptintr/opptorg.htm>

CCAR featured site links
<http://www.ccar-greenlink.org/links/index.html#featured>

The UW-Extension, Solid and Hazardous Waste Education Center (SHWEC) has brought you this publication. SHWEC provides Wisconsin businesses with free, non-regulatory technical assistance, education and information.

Go to our web site at <http://www.uwex.edu/shwec> to contact any of our Staff.

If you need any information or assistance concerning this publication or if you have suggested improvements please contact jannis@uwsp.edu or call 715-346-2793.

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