



# Environmental Compliance Guide for Automotive Body Shops



A guide to help automotive body shops understand and comply with Ohio EPA rules, reduce waste and save money.

Division of Environmental and Financial Assistance  
Office of Compliance Assistance and Pollution Prevention

February 2019

## Contents

<b>Need Help Understanding Ohio EPA's Environmental Regulations?</b> .....	<b>2</b>
<b>Introduction</b> .....	<b>3</b>
How to use this guide .....	3
<b>Air Pollution Requirements</b> .....	<b>3</b>
Does your shop have an air emission source? .....	3
Is your air emission source exempt from air permitting? .....	4
Source is permanently exempt under Ohio's regulations .....	4
Source has low emissions and is defined as a "de minimis" source under Ohio's regulations .....	5
Source qualifies for a Permit-by-Rule (PBR) .....	5
TIPS to reduce air emissions and improve compliance .....	5
How do you obtain an air permit for sources that are not exempt? .....	5
Are there reporting requirements that apply to my PTIO? .....	6
Are there any other air rules that could apply to your shop? .....	6
<b>Air Pollution Requirements Self-Assessment Check</b> .....	<b>7</b>
<b>Waste Management Requirements</b> .....	<b>7</b>
What wastes does your shop generate? .....	7
What rules do you have to follow to properly manage and dispose of your waste? .....	8
Universal waste .....	8
Hazardous waste .....	8
How should you manage and dispose of wastes generated at your shop? .....	9
Waste Management Requirements Self-Assessment Check .....	12
<b>Wastewater Discharge Requirements</b> .....	<b>14</b>
Sanitary wastewater .....	14
TIPS to reduce wastewater discharges and improve compliance .....	14
Industrial wastewater .....	14
Discharges to a public wastewater treatment plant .....	14
Specific wastewater considerations .....	15
Wastewater Discharge Requirements Self-Assessment Check .....	15
<b>Underground Storage Tank Requirements</b> .....	<b>15</b>
<b>Spill Prevention Control and Countermeasure Requirements</b> .....	<b>16</b>
Oil Spill Prevention .....	16
Spill Prevention Control and Countermeasure Requirements Self-Assessment Check .....	17
<b>Appendix A: Glossary of Environmental Terms</b> .....	<b>18</b>
<b>Appendix B: Helpful Web Links and Additional Information</b> .....	<b>19</b>
<b>Appendix C: Example Materials and Waste Container Labels</b> .....	<b>21</b>
<b>Appendix D: Commercial Recycling Services and Facilities Accepting Hazardous Waste</b> .....	<b>23</b>
<b>Appendix E: De Minimis Example Emissions Calculations and Documentation</b> .....	<b>24</b>

## Need help understanding Ohio EPA's environmental regulations?

If you are running an automotive body shop, it is important for you to know the Ohio EPA regulations that may apply to your shop. You may need permits for air pollution sources or wastewater discharges. You may also be required to notify Ohio EPA if you generate hazardous waste. Complying with some regulations, such as getting a permit, may take some time. So, the earlier you consider and understand your responsibilities under the rules, the better.

Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) is a free and confidential resource to help small businesses comply with environmental regulations and permit requirements. Our environmental specialists can answer your questions regarding air, waste, water and other Ohio EPA regulatory requirements and help find ways to reduce waste and save money. OCAPP provides:

- Toll-free hotline - (800) 329-7518
- Free on-site compliance and pollution prevention assessments
- Help with permit applications and forms
- Assistance with material reuse and recycling
- Environmental workshops
- Easy-to-understand publications and guidance documents

To keep up-to-date with any changes in the laws and for updates to this guide, visit OCAPP's webpage at [epa.ohio.gov/ocapp/ComplianceAssistanceandPollutionPrevention.aspx](http://epa.ohio.gov/ocapp/ComplianceAssistanceandPollutionPrevention.aspx).

*OCAPP services are free and confidential!*

## Introduction

This guide is intended to help automotive body shops understand the regulatory requirements that may apply to them. This guide summarizes the major areas of compliance – air, waste and water; however, it does not address every environmental issue or regulation that may apply to your shop. It is intended as a tool to help you evaluate your compliance and should not be used as your only tool for understanding the regulations. A review of Ohio EPA's environmental regulations, other guidance materials and publications is also needed to gain a complete understanding of the requirements.

## How to use this guide

The guide is divided into sections based on each major regulatory area that may apply to your shop. The guide also contains compliance checklists at the end of each section. The checklists are intended to help you recognize the areas where compliance with the regulations can be improved. The compliance checklists are intended for your internal use only and do not need to be returned to Ohio EPA. You should periodically perform the self-assessments to help your shop stay in compliance. This guide also includes best management practices (BMPs) and pollution prevention tips to help your shop reduce waste and save money. At the end of this guide you will also find appendices that contain useful reference information.

Using this guide can help your shop:

- Understand applicable environmental regulations
- Improve regulatory compliance
- Reduce pollution
- Conserve resources and save money

- ✓ Read the regulatory overview in each section before completing the checklist.
- ✓ Read each checklist question carefully and check the box that applies to your shop. If you are unsure what is being asked, please refer to the discussion of the regulatory area and the additional information in the guide. Completing the checklist will require you to review your shop's practices
- ✓ Answers selected in a highlighted box may indicate areas of non-compliance or areas where your shop's compliance can be improved. If you identify any areas where your shop is not meeting the regulatory requirements, you should carefully review the applicable section of the guide for information on how to return to compliance. Address any areas of non-compliance as soon as possible.

If you need additional assistance in understanding how to use this guide and complete the checklists, please contact OCAPP at (800) 239-7518.

## Air Pollution Requirements

An air pollution source is anything that emits air pollution, such as dust, fumes, gases, mist, smoke, vapors or odors. Automotive body shops often perform many different activities that are sources of air pollution. In Ohio, air permits are required for all sources of air pollution unless the source is exempt. There are exemptions from air permits specific to shops that are covered later in this section. It is very important that you identify all air pollution sources at your shop and determine if you need an air permit.

### Does your shop have an air emission source?

Most shops will have sources of air pollution. There are four general rules of thumb that are useful when trying to identify your air pollution sources.

- Something with a stack, dust collector or vent. Examples include shot blasters, grinders and storage tanks.
- A process that uses paints, solvents, adhesives or other chemicals. Examples include paint booths, solvent degreasing and cleaning activities (including solvent parts washers).
- Something that burns fuel (for example, oil, natural gas, coal). Examples include boilers, furnaces and process heaters.
- A process that produces visible dust, smoke or odors. Examples include roadways, parking areas and material handling areas.

Common air emission sources at automotive body shops include:

- Spray booths
- Solvent cleaning/degreasing (parts washers)
- Welding
- Grinding
- Shot blasting
- Shop heaters/furnaces
- Paved and unpaved roadways and parking areas



Tips to evaluate whether your shop needs an air permit.

- ✓ Start by identifying all sources of air pollution at your shop.
- ✓ Determine whether any of these sources are exempt.
- ✓ Calculate emissions for all sources that are not exempt.
- ✓ Determine your compliance status.

It is helpful to begin by conducting a shop inventory to identify all processes and equipment. Evaluate each piece of equipment and each process at your shop to determine whether that source emits air contaminants. Include all equipment or processes even if they do not directly emit contaminants through a stack or a vent. Evaluate other activities related to the process or equipment. For example, activities such as cleaning spray guns with solvents or using a parts degreaser can also be sources of air pollution and need to be included in your inventory. Gather information about each air emission source, including how the equipment is used, maximum capacity, safety data sheets, performance test results and any emissions control equipment. Be as thorough as possible in preparing your shop's inventory.

Be aware that just because you have identified your potential sources of air emissions does not necessarily mean that each source will require an air permit. Once you have completed your inventory, you need to evaluate each process/equipment to determine if an air permit is needed. Ohio EPA has many air permitting exemptions that may be applicable to your operations. The guidance provided below can assist you with this process.

### Is your air emission source exempt from air permitting?

Once you have identified your emission sources, your next question may be "Do I need an air permit for each emission source at my shop?" Activities that involve paints and solvents are regulated and often require air permits because these materials contain volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). But, not all sources of air pollution require an air permit. If you have an air emission source that meets certain criteria it may be exempt from air permitting. There are three common scenarios where an air emission source could be exempt from air permitting.

#### Source is permanently exempt under Ohio's regulations

Ohio EPA has determined that certain types of equipment and industrial activities do not require air permits. These are called permanent exemptions and include a variety of equipment and operations. In some cases, the source must meet certain criteria (such as specific horsepower, gallons of coating used, storage capacity, etc.) to qualify for the permanent exemption. Some common shop equipment and operations that may be exempt include:

- small solvent recycling or reclaiming units;
- small solvent cold cleaners or parts washers;
- parts washers and rinse tanks using detergent cleaners;
- grinding and machining operations;
- small coating operations; and
- boilers, furnaces or dryers that meet specific criteria and are under 10 million BTU.

If you are already operating your shop and discover that you need an air permit, you must still complete and submit a PTIO application.

**Appendix B** has information about the complete list of permanent exemptions to help determine if your air emission source is permanently exempt. There are some exceptions, so it is important to read the language carefully and be sure that your source qualifies.



Under Ohio EPA's rules, you **cannot** open burn waste at your shop.



Some equipment, like small parts washers, may be exempt from air permitting.

### Source has low emissions and is defined as a “de minimis” source under Ohio’s regulations

If you have a source that meets a permanent exemption or the de minimis exemption, you are not required to notify Ohio EPA or your local air agency, however, it is important to document your exemption and maintain records that demonstrate how you determined that your actual emissions do not exceed the de minimis thresholds.

In most cases, if an air emission source emits less than 10 pounds per day of air pollutants and less than one ton per year (2,000 pounds) of hazardous air pollutants, then it is considered *de minimis* and does not require an air permit. Whether a unit is de minimis usually depends on factors such as the size of the equipment and type of materials used (for example, low-VOC or water-based coatings).

To determine if a source is de minimis, you must first calculate emissions from the source. Ohio EPA has developed a [de minimis example emission calculation fact sheet](#) (Appendix E) that explains step-by-step how to calculate your emissions. If you determine you have a de minimis source, you are required to keep paper work to prove the unit is de minimis. There are additional conditions in the de minimis rule (OAC rule 3745-15-05 in Appendix B) that you are required to comply with.

### Source qualifies for a Permit-by-Rule (PBR)

Some equipment and operations qualify for an air Permit-by-Rule (PBR). If you have a source that qualifies for a PBR, you are not required to go through the formal air permitting process for the source. Rather, you notify Ohio EPA that you would like coverage under the PBR through a simple, one-page notification form. It’s important to know that you must demonstrate that your source meets all the qualifying criteria for a PBR. If you do not meet the criteria for a PBR, you must obtain a standard permit-to-install and operate (PTIO) for the source.

When operating under a PBR, you must comply with all the PBR general provisions, including any applicable recordkeeping and reporting requirements outlined in the PBR rule. It is critical that a shop wanting to operate under a PBR exemption be aware of these requirements.

There are three PBRs that may be applicable to your shop:

- PBR for [painting operations](#);
- PBR for [gravel driveways and parking lots](#); and
- PBR for [back-up, emergency generators](#).

To determine if your source qualifies for a PBR, begin by reviewing the [notification forms and instructions](#). If your source meets the criteria on the notification forms, complete and submit to your [district office or local air agency](#). For more information see [Ohio EPA’s PBR fact sheet](#).

### How do you obtain an air permit for sources that are not exempt?

If you have a source of air pollution that is not exempt, then an air permit, known as a Permit-to-Install and Operate (PTIO), is needed for that source. The PTIO acts as both the permit to install and the permit to operate the emissions source.

To obtain an air permit, you must complete a permit application and submit it to the [Ohio EPA district office or the local air agency covering your area](#). The air permitting process can take some time and you must have your air permit before you start operating the air pollution source. Therefore, it is important to start the permit process as early as possible. If you are already operating your shop and discover that you need an air permit, you must still complete and submit the PTIO application.

Air permit violations can occur when you do not understand the requirements of your air permit, therefore, it is important to read and understand your air permit requirements.

### TIPS to reduce air emissions and improve compliance

- Use water-based or low-VOC coatings.
- Keep paint and solvent containers closed when not in use.
- Use high volume/low pressure spray guns.
- Practice good inventory control. Only mix enough paint to complete the job.
- Keep parts washers away from heat sources and drafts to prevent evaporation.
- Change solvent only when it loses its cleaning power, not on a schedule or because it looks dirty.
- Use a two-stage cleaning system, using dirty solvent for pre-cleaning, then finish cleaning with clean solvent.
- Clean parts by hand with detergent, instead of using chemicals.
- Routinely inspect gun washers and parts cleaning machines for leaks.
- Practice good spill prevention. If a spill occurs, clean it up immediately.

### Are there reporting requirements that apply to my PTIO?

Your PTIO will require that you submit an annual permit evaluation report (PER) for each of your air emission sources and that you submit a biannual fee emissions report (FER). Ohio EPA will send you the forms along with instructions for completion and where to return. The annual PER summarizes the activity over a 12-month period for each air emissions source including deviations and exceedances. The biannual FER allows you to self-report your total facility air emissions which will be used to determine your air pollution fee. This form also allows you to report changes to facility mailing address, facility name, primary contact person and ownership changes.

### Are there any other air rules that could apply to your shop?

Depending on where your shop is located and what specific activities you perform, there may be additional air rules and requirements that apply. It is important to understand all the air rules that could apply to your shop. Please note that applicability of some of these rules depends on the specific operations your shop performs and maybe even where your shop is located. It is important to read these rules carefully, so you can understand if your shop is subject to additional air pollution-related requirements. These additional rules and requirements are summarized below.

<b><i>National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 CFR 63, Subpart HHHHHH)</i></b>	This U.S. EPA rule applies nationwide to shops spraying coatings with certain metals or using paint strippers and cleaners containing methylene chloride. Requirements include: initial notification; painter training; enclosed spray operations with 98 percent efficient filtration; efficient spray guns and enclosed gun washers. For more information, visit U.S. EPA's <a href="#">NESHAP 6H Summary</a> .
<b><i>Ohio Administrative Code (OAC) 3745-21-18</i></b> - Commercial motor vehicle and mobile equipment refinishing operations	This rule specifies VOC per gallon limits for auto refinishing coatings, clean-up practices and paint technician training and only applies if you are in the Akron, Cleveland, Cincinnati or Dayton metro counties. (Note: This rule is independent of the federal NESHAP rule.)
<b><i>Ohio EPA's environmental requirements for gas stations</i></b>	Gas stations are subject to Ohio EPA's air pollution control requirements. These stations include retail service stations or private facilities where gasoline is dispensed into vehicle fuel tanks and gasoline vapors are released. The two main types of vapor control equipment are known as Stage I and Stage II vapor controls. Stage I vapor control is required on most gasoline dispensing facilities with a few exceptions. Stage II vapor control is required in 16 Ohio counties. For more information, visit Ohio EPA's <a href="#">Gasoline Dispensing Facilities webpage</a> .
<b><i>Federal requirements for servicing vehicle air conditioning systems</i></b>	Refrigerant from motor vehicle air conditioners (MVAC) is regulated under the Clean Air Act. U.S. EPA regulates how refrigerant is handled from MVACs. Most of these requirements come from regulations under section 609 of the Clean Air Act (CAA), however CAA sections 608 and 612 also set standards for refrigerant recovery and disposal. Generally, these rules apply to facilities that service motor vehicle air conditioning systems and require <a href="#">technician training</a> , use of approved equipment, safe disposal and recordkeeping to prevent the release of refrigerants during servicing.
<b><i>Ohio's Vehicle Anti-Tampering Law</i></b> - For shops involved in repairing, selling or buying vehicles	Under state law, it is illegal to sell, lease, rent or operate a vehicle in a tampered condition. Removing a pollution control device from a vehicle is illegal. Likewise, selling or installing a device that would hamper the effectiveness of any vehicle pollution control system is prohibited. Tampering includes permanently removing, bypassing, defeating or rendering inoperative, in whole or in part, any emission control system from its original design.

## Air Pollution Requirements Self-Assessment Check

Any shaded areas indicate the need for further assessment or identifies a potential compliance area that should be addressed. Need help determining your compliance with regulations or determining your next steps? Contact OCAPP at (800) 329-7518 for free and confidential assistance.

Self-Assessment Check – Air Requirements		
1) Have you completed an inventory of all equipment and process at your shop that could produce air pollution (for example, something with a stack, vent, dust collector, painting, solvents)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
If you have air emission sources, have you evaluated the following:		
2) Do you have an air emission source that is permanently exempt?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
3) Do you have air emission sources that meet a PBR exemption?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
a) If yes to question 3, have you notified Ohio EPA of all your PBR-exempted sources?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
4) Do you have emission sources that meet the de minimis exemption?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
a) If yes to question 4, do you have the required paperwork to demonstrate the sources are de minimis, including emission calculations?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
5) If you have air sources that are not exempt, de minimis or qualify for a PBR, have you submitted an air permit (PTIO) application?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
6) Have you evaluated other Ohio EPA and federal air rules that may apply to your shop?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
7) Do you understand how to comply with the U.S. EPA spray coatings rule if you are spraying coatings with certain metals or using paint strippers and cleaners containing methylene chloride ( <a href="#">NESHAP 6H</a> )?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
8) Do you burn waste (for example, trash, pallets, cardboard)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
9) Do you remove motor vehicle air conditioning (MVAC) refrigerants?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
a) If yes to question 9, are you in compliance with U.S. EPA's regulatory requirements for MVAC system servicing?  <b>Note:</b> Any person who repairs or services a MVAC system must be properly trained and certified under <a href="#">section 609</a> of the Clean Air Act by an EPA-approved program.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
10) Do you dispense gasoline into vehicle fuel tanks?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
a) If yes to question 10, are you following the proper Ohio EPA vapor control equipment requirements?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

## Waste Management Requirements

If you have a material that you are going to dispose of, it is considered a waste. You must evaluate each waste to determine whether it is considered hazardous waste. If it is hazardous, you need to ensure proper on-site and off-site management of this waste at a permitted treatment storage or disposal (TSD) facility.

### What wastes does your shop generate?

To determine if your shop is in compliance, start by conducting a detailed inventory of the wastes produced at your shop.

Some wastes you generate will be classified as solid waste, including materials such as trash, cardboard, scrap metal and tires. Other wastes will meet the definition of hazardous waste under Ohio EPA's rules. All wastes must be properly managed and disposed of, either under the solid or hazardous waste rules.

Common shop-related wastes that may be considered hazardous include:

- **waste paint and paint-related wastes;**
- spent solvents, brake cleaners and penetrating fluids;
- **rags/wipes** (reusable or disposable);
- parts washer fluids and filters;
- paint booth filters;
- **waste aerosol cans;**
- **spent light bulbs;**
- **used antifreeze;**
- batteries;
- scrap tires;
- lead weights;
- **used oil** and oil filters; and
- fuel.



Wastes from painting and solvent-based cleaning are often hazardous.



## What rules do you have to follow to properly manage and dispose of your waste?

### Universal Waste

There are specific hazardous waste streams that your shop can choose to manage in an alternative manner in place of more complex hazardous waste requirements. Wastes such as aerosol containers, antifreeze, paint and paint-related wastes, light bulbs, batteries (from vehicles, computers, cell phones and power tools) can be managed under reduced requirements known as the **universal waste rules**. Recent changes by Ohio EPA have added four new categories of waste to the universal waste rules. These Ohio-specific universal waste rules included non-empty aerosols, antifreeze, paint and paint-related waste. The advantages of handling these hazardous wastes under the universal waste rules include:

- waste does not need to be evaluated;
- not counting them toward your monthly hazardous waste generation rate;
- increased on-site storage time (up to one year);
- decreased on-site management;
- no hazardous waste manifesting required; and
- no hazardous waste transporter required.

### Hazardous Waste

If you have **evaluated your waste** and determined that it is hazardous, your shop is considered a hazardous waste generator. Ohio has three hazardous waste generator categories: conditionally exempt small quantity generator (CESQG); small quantity generator (SQG); and large quantity generator (LQG). The specific rules you must follow depend on which hazardous waste generator category your shop falls under. The category that your shop falls under depends on the total weight of hazardous waste generated (produced) in any given month of the calendar year. For CESQGs and SQGs, your generator category is also determined by the amount of hazardous waste you accumulate on-site.

Most small shops are CESQGs and some are SQGs. The regulations that apply vary by the hazardous waste category that applies to a shop. The smaller the category, the fewer the requirements that apply. The **hazardous waste generator requirements summary table** and the **hazardous waste recordkeeping requirements table** provide a good summary of the general requirements in each hazardous waste generator category.

If your shop generates more than 220 pounds (roughly half of a 55-gallon drum) of hazardous waste in any given month, you must obtain a U.S. EPA identification number from Ohio EPA by submitting a **Notice of Regulated Waste Activity Form**. There is no fee for the identification number and if you need help completing the notification form, **contact OCAPP for free and confidential assistance**. All hazardous waste must be sent to a **permitted hazardous waste facility for treatment and/or disposal**. It is also acceptable under the rules for some hazardous waste to be sent off-site for recycling.

Hazardous Waste Generator Categories			
	CESQG	SQG	LQG
Generation per Month	No more than 220 pounds (roughly half of a 55-gallon drum).	More than 220 and less than 2,200 pounds (between roughly half of a 55-gallon drum and five, 55-gallon drums).	More than 2,200 pounds (more than roughly five, 55-gallon drums).
Total Accumulation On-site	Never accumulate more than 2,200 pounds (more than roughly five, 55-gallon drums) on-site at any given time.	Accumulate more than 2,200 and less than 13,200 pounds (between roughly five and 30, 55-gallon drums) on-site at any given time.	No quantity limit but there is a 90-day accumulation time limit.

## How should you manage and dispose of wastes generated at your shop?

The following section and tables provide details on the management and disposal requirements for the most common wastes generated at auto-related shops, including solid (non-hazardous) and hazardous wastes.

Common Waste Generated from Automotive Body Shops			
Waste	Waste Type/Description	Management Options	Improve Compliance and Reduce Waste
Aerosol cans	Can be hazardous if the contents are not properly emptied. Includes containers that are non-opening, non-refillable and hold a substance under pressure and can release the substance as a spray, gel or foam by means of a propellant gas.	<ul style="list-style-type: none"> <li>• Empty the can and manage the contents as a hazardous waste and recycle the can as scrap metal.</li> <li>• Manage as a <b>universal waste</b> and send non-empty aerosol cans to another universal waste handler's location where they may remove the contents from the can.</li> <li>• Send the non-empty aerosol can to a <b>permitted hazardous waste facility</b> for disposal.</li> </ul>	Purchase fluids in bulk and use refillable bottles in place of aerosol cans when possible.
Antifreeze	Can be hazardous depending on concentration of certain metals or if mixed with hazardous waste. Includes propylene glycol or ethylene glycol and used as heat transfer in engine radiators, HVAC units, electronics and overwintering equipment.	<ul style="list-style-type: none"> <li>• If hazardous, manage as a <b>universal waste</b> and recycle on-site or at another universal waste handler's location (for example, antifreeze recycler). This universal waste may also be sent to a <b>permitted hazardous waste facility</b> for disposal or fuel blending.</li> <li>• If non-hazardous, recycle on-site or send to an <b>antifreeze recycler</b>.</li> </ul>	Have good housekeeping practices to minimize spills and leaks
Batteries	Usually hazardous if rechargeable or if they are lead-acid batteries. Includes all types of batteries including lead-acid.	<ul style="list-style-type: none"> <li>• Spent lead acid batteries can be managed under Ohio EPA's <b>lead acid battery rule</b> or as a <b>universal waste</b>.</li> </ul>	Reduce types of batteries used on shop floor to promote more efficient use on different equipment.
Empty containers	Can be hazardous depending on the nature of the original contents of container and if not properly emptied. Empty containers such as paint cans, plastic paint mixing cups, cans of thinner and spent aerosol cans can contain residual material that meet the definition of a hazardous waste when disposed.	<ul style="list-style-type: none"> <li>• Container may be subject to hazardous waste rules unless it meets the definition of <b>"RCRA empty"</b>.</li> <li>• Aerosol cans whether empty or not can be handled as a <b>universal waste</b>.</li> </ul>	Label all materials and wastes. Keep tight-fitting lids on containers except when adding or removing material or waste.
Light bulbs	Can be hazardous depending on levels of mercury or other toxic metals. Includes incandescent, high-pressure sodium, fluorescent, high-intensity discharge, neon, metal halide, LED, etc.	<ul style="list-style-type: none"> <li>• If hazardous, can be managed as <b>universal waste</b> and sent to another universal waste handler or to a <b>permitted hazardous waste facility</b>.</li> </ul>	Check to see if your local utility offers rebates for lighting and energy efficiency upgrades.

Common Waste Generated from Automotive Body Shops			
Waste	Waste Type/Description	Management Options	Improve Compliance and Reduce Waste
Paint	Likely hazardous unless using water-borne paints with no metals. Includes all types of paints, stains, varnishes and inks.	<ul style="list-style-type: none"> <li>Unused paint may be managed as a commercial chemical product which is not a waste when sent to a reclaimer.</li> <li>Manage as a <b>universal waste</b> and send to another universal waste handler for storage or reclamation. This universal waste may also be sent to a <b>permitted hazardous waste facility</b> for recycling and disposal.</li> <li>If the paint is non-hazardous, it can be disposed of in the regular trash if first solidified or sent to a <b>paint recycler</b>.</li> </ul>	Only mix enough paint needed for job and use water-borne paint when possible.
Paint-related waste	Can be hazardous depending on concentrations on the material. Materials contaminated with paint can include but are not limited to solvents, gloves, rags, debris, booth filters, stripping, masking materials, paint sludge from water-wash curtains, cleanup from paint spills, residues and sand blasting media.	<ul style="list-style-type: none"> <li>Manage as a <b>universal waste</b> and may be sent to another universal waste handler for storage. This universal waste may also be sent to a <b>permitted hazardous waste facility</b> for reclamation and disposal.</li> <li>Manage under the <b>hazardous waste generator requirements</b> and send to a <b>permitted hazardous waste facility</b>.</li> <li>If non-hazardous, can be disposed of in the regular trash or <b>recycled</b>.</li> </ul>	Use high-efficiency spray equipment and avoid excess overspray.
Refrigerant	Refrigerant from motor vehicle air conditioners (MVAC) is regulated under the Clean Air Act. U.S. EPA regulates how refrigerant is handled from MVACs. Most of these requirements come from regulations under section 609 of the Clean Air Act (CAA), however CAA sections 608 and 612 also set standards for refrigerant recovery and disposal.	<ul style="list-style-type: none"> <li>Any person who repairs or services a MVAC system must be properly <b>trained and certified</b> under section 609 of the Clean Air Act by a U.S. EPA-approved program.</li> <li><b>Refrigerant recovered</b> from vehicles must either be sent off-site to a reclamation facility or recycled on-site.</li> </ul>	Keep waste streams separate for reuse, recycling or treatment. Keep non-hazardous materials from becoming contaminated.
Scrap tires	Non-hazardous solid waste. Tires that are removed from vehicles (both those on and off rims) are defined as scrap tires. A tire that is still on a vehicle is not considered a scrap tire.	<ul style="list-style-type: none"> <li>Most shops that generate scrap tires do not have to register as a scrap tire facility if you meet <b>certain requirements</b>.</li> <li>Dispose only at <b>approved Ohio EPA facilities</b>.</li> <li>When shipped off-site, you must use a <b>transporter that is registered by Ohio EPA</b>.</li> <li>Shipping papers must be completed and kept for three years.</li> <li>Self-transporting to a disposal facility may require <b>registration as a scrap tire transporter</b>.</li> </ul>	

Common Waste Generated from Automotive Body Shops			
Waste	Waste Type/Description	Management Options	Improve Compliance and Reduce Waste
Spent solvents	Likely hazardous due to ignitability and/or chemical constituents. Includes all types of solvents used for cleaning and degreasing.	<ul style="list-style-type: none"> <li>If contaminated with paint, manage as a <b>universal waste</b> and may be sent to another universal waste handler for storage. This universal waste may also be sent to a <b>permitted hazardous waste facility</b> for recycling and disposal.</li> <li>If not contaminated with paint, manage under the <b>hazardous waste generator requirements</b> and send to <b>permitted hazardous waste facility</b> or recycle on-site in a distillation unit.</li> </ul>	Substitute less toxic or nontoxic solvent alternatives whenever possible. Options include terpenes, citric acid-based cleaners, microbial cleaners or aqueous or water-based cleaners.
Solvent contaminated wipes/rags	Can be hazardous depending on the solvent used. Includes wipes and rags that are contaminated with solvents.	<ul style="list-style-type: none"> <li>If contaminated only with an F-listed or ignitable solvent, wipes sent to a laundry facility for reuse may be managed under the <b>solvent-contaminated wipe exclusion and/or the laundered textile exemption</b>.</li> <li>If contaminated only with an F-listed or ignitable solvent, except trichloroethylene (TCE), they may be disposed in the regular trash and are not considered hazardous waste.</li> </ul>	Clean only the parts that need to be cleaned for the repair.
Used oil	Used oil from your shop is subject to Ohio EPA's used oil rules. Examples of used oil include engine oil, lubricating oil, metal cutting fluids, brake fluid, transmission fluid and hydraulic fluid.	<ul style="list-style-type: none"> <li>Label used oil containers with the words "Used Oil" and send to a <b>used oil recycling company</b>, or use as fuel in your used oil space heater.</li> <li>If sent to another garage for use as fuel in a used oil space heater or if you take/purchase used oil from another generator, either you or the generator must act as a marketer. A marketer is someone who confirms that the used oil is <b>on specification</b> per the used oil rules. Make sure you also follow the <b>used oil space heaters rules</b>.</li> </ul>	Keep material storage areas clean and dry. Regularly inspect storage areas for leaks and spills.
Used oil filters	Non-hazardous if they are non-tern plated and handled correctly. Includes all sizes of heavy duty and light-duty vehicle used oil filters.	<ul style="list-style-type: none"> <li>Light-duty vehicle oil filters can be disposed of in the trash or recycled as scrap metal if properly <b>hot-drained</b>. Hot-draining means that you remove and drain the filter at close to engine temperature. Three different methods of hot-draining used oil filters are acceptable.</li> <li>Heavy-duty vehicle oil filters can be recycled as scrap metal if properly hot-drained. Otherwise they will need to be evaluated to determine if they are hazardous and managed accordingly.</li> </ul>	Train employees on best management practices to reduce waste.



## Waste Management Requirements Self-Assessment Check

Any shaded areas indicate the need for further assessment or identifies a potential compliance area that should be addressed. Need help determining your compliance with regulations or determining your next steps? Contact OCAPP at (800) 329-7518 for free and confidential assistance.

Self-Assessment Check – Waste Management Requirements		
<b>Hazardous Waste</b>		
1) Have you evaluated all your waste streams to determine whether any of your wastes are hazardous waste?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2) For potentially hazardous waste streams, do you have information kept on-site that clearly demonstrates the waste is not hazardous waste?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
3) Are all hazardous wastes sent to an Ohio EPA-permitted treatment, storage and disposal facility or recycling company?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
4) Do you know how much hazardous waste you generate in a month?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
5) If you generate more than 220 lbs. (roughly ½ of a 55-gallon drum) of hazardous waste in any month, have you obtained a generator identification number from Ohio EPA?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
6) Are you in compliance with Ohio EPA's hazardous waste generator requirements for your generator category?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Aerosol cans</b>		
1) Are your aerosol cans properly emptied and the collected contents properly evaluated?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2) If your aerosol cans are hazardous because they are not emptied, are you managing them as a universal waste and sending to another handler for reclamation or storage, or sending them to a permitted hazardous waste facility for recycling or disposal?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Antifreeze</b>		
1) Have you evaluated your antifreeze to determine if it is hazardous?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2) If your antifreeze is hazardous, are you managing it as a universal waste and reclaiming the antifreeze or sending to another universal waste handler for recycling or storage?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
3) If no to question 2, do you send your universal waste antifreeze to a permitted hazardous waste facility for recycling, disposal or fuel blending?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
4) Do you put antifreeze into the sewer or septic system? Have you obtained permissions from your POTW?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
5) Do you dump antifreeze on the ground or put it into your trash?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Batteries</b>		
1) Are your batteries stored on-site in a manner that prevents leaks or spills?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2) Do you send lead acid batteries off-site to a recycling company?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
3) If you are handling your spent batteries as universal waste, are you in compliance with the universal waste rules?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Empty containers</b>		
1) Do your empty containers meet the definition of "RCRA empty"?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
a) If no to question 1, are you managing (aerosol cans only) as a universal waste and sending to another universal waste handler or a permitted hazardous waste facility?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Light Bulbs</b>		
1) Are you throwing your light bulbs in the trash?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
a) If yes, do you have documentation that your bulbs are non-hazardous, such as up-to-date testing data from the manufacturer or results from lab testing?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2) If you manage your light bulbs as universal waste, are you in compliance with the universal waste rules?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Paint</b>		
1) Have you evaluated your paint to determine if it is hazardous?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2) If your paint is hazardous, are you managing as a universal waste and sending to a universal waste handler for reclamation or sending to a permitted hazardous waste facility for recycling or disposal (includes fuel blending)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Paint-related waste</b>		
1) Have you evaluated your paint-related waste to determine if it is hazardous?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Self-Assessment Check – Waste Management Requirements		
2) If your paint-related waste is hazardous, are you managing as a universal waste and sending to a universal waste handler or sending to a permitted hazardous waste facility for recycling or disposal (includes fuel blending)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Refrigerant</b>		
1) Do you remove motor vehicle air conditioning (MVAC) refrigerants?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
a) If yes to question 1, are you in compliance with U.S. EPA's regulatory requirements for MVAC system servicing?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<i>Note: Any person who repairs or services a MVAC system must be properly trained and certified under <a href="#">section 609</a> of the Clean Air Act by an EPA-approved program.</i>		
2) Do you send recovered refrigerant off-site to be reclaimed or recycle on-site?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Scrap tires</b>		
1) If you remove tires from vehicles:		
a) Do you collect the spent wheel weights and recycle them as scrap metal?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
b) Do you store scrap tires outside?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
c) Are you storing more than 1,000 tires outside?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
d) Do you provide mosquito control for outdoor piles?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
e) Do you protect tires from sources of ignition?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
f) If you transport scrap tires, have you determined whether you need to register with Ohio EPA as a transporter?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
g) Do you make sure that scrap tire shipping papers are kept on-site?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Spent solvents</b>		
1) Have you evaluated your spent solvents to determine if it is hazardous?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2) If your spent solvent is contaminated with paint, are you properly managing as a universal waste and sending to another handler or sending to a permitted hazardous waste facility for disposal?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
3) If your spent solvent is not contaminated with paint, are you properly managing as a hazardous waste and sending to a permitted hazardous waste facility?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Solvent contaminated wipes and rags</b>		
1) If you generate solvent contaminated rags or wipes:		
a) Have you evaluated them to determine if they are hazardous or are you managing them under the <a href="#">solvent-contaminated wipe exclusion</a> ?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
b) If you are managing your solvent contaminated rags/wipes under the solvent-contaminated wipe exclusion, are you complying with the management and recordkeeping requirements?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
c) If you are not managing your solvent contaminated rags/wipes under the solvent-contaminated wipe exclusion, are you complying with Ohio EPA's hazardous waste regulations?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Used oil and used oil filters</b>		
1) If you remove used oil from vehicles:		
a) Are your used oil storage containers or tanks in good condition?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
b) Are storage containers or tanks labeled with the words "used oil"?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
c) If sent for off-site recycling, does your used oil transporter have an EPA identification number?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
d) Is used oil dumped on the ground or put on the ground to control dust on your property?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
e) Is used oil thrown away in your trash?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
f) Do you prevent the mixing of used oil with hazardous waste?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2) If you remove non-tern plated oil filters from vehicles:		
a) Is used oil removed from filters before they are recycled or disposed?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
b) Are you following Ohio EPA's <a href="#">guidelines</a> for hot draining oil filters?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
3) If you burn your used oil in a space heater:		
a) Is the capacity of your space heater less than 500,000 BTUs per hour?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
b) Is your space heater vented outside the building?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
c) Do you accept used oil from other businesses and burn it in your space heater?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

**Self-Assessment Check – Waste Management Requirements**

d) Did you or the used oil provider act as a marketer of used oil to demonstrate the used oil is on specification?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
e) Do you keep records of how much used oil you burn in your space heater?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

**Wastewater Discharge Requirements****Sanitary Wastewater**

If your shop has a restroom, break area with sinks, laundry etc., then you generate sanitary wastewater. One option for managing sanitary wastes includes discharging to a sanitary sewer that leads to a public wastewater treatment plant – or POTW (publicly owned treatment works). Sanitary wastes can also be discharged to an on-site sanitary waste treatment system, such as a septic system.

If you need to construct or make any modifications to an on-site sanitary waste treatment system (septic tank and leach field), this activity requires a permit-to-install (PTI) from Ohio EPA. In addition, if there is a discharge from the treatment system to surface water (for example, a stream, river, lake, etc.), a discharge permit, called an NPDES (National Pollutant Discharge Elimination System permit), is required from Ohio EPA.

**TIPS to reduce wastewater discharges and improve compliance**

- Keep your shop clean. Prevent spills and leaks that may add contaminants to floor rinse waters.
- Check all your floor drains and make sure you know where they drain.
- Consider washing vehicles at a local carwash whose discharge is regulated by Ohio EPA or your local POTW.
- Inspect hoses and hose bibs regularly to identify any leaks.
- Keep good records of your shop's wastewater generation and discharge structures.
- Perform maintenance as required to prevent spills and generating wastewater.
- Consider posting signs prohibiting the discharge of industrial chemicals or industrial wastewater to bathroom sinks, kitchen sinks, toilets or other non-industrial drainage structures.

**Industrial Wastewater**

Your shop may also generate wastewater from equipment cleaning, washing vehicles, mopping floors, wet sanding or other sources. This is known as industrial or process wastewater.

You **cannot** discharge industrial wastewater directly:

- to storm sewers or storm drains;
- to a drain or sewer system if you do not know where it leads;
- outside of your building or on the ground; or
- to a ditch, creek, river or other water body without a permit from Ohio EPA.

**Discharges to a public wastewater treatment plant**

Some industrial wastewater discharges go directly to a local POTW. This type of discharge is known as an indirect discharge. Often, POTWs are responsible for regulating the companies that discharge wastewater to them. A large POTW may be able to handle the industrial wastewater from your shop. However, even large wastewater treatment plants are not generally designed to handle industrial wastes like chemicals, metals, oils, etc. If you are discharging to a POTW, you need to contact the plant directly to discuss your activities. You may need a permit for the discharge. In addition, your POTW may require you to treat the wastewater before discharging (for example, oil/water separation, removing solids, chemicals, etc.). If the POTW requires you to install a pre-treatment system, holding tank or other wastewater collection, storage or treatment unit, a PTI will be needed from Ohio EPA's Division of Surface Water. More information about Ohio EPA's PTI program can be found on the Division of Surface Water's [wastewater PTI webpage](#) and in the appendix.



*Label floor drains and consider having them capped or plugged if not in use.*

## Specific Wastewater Considerations

Shops often have floor drains which, if improperly used, can contaminate nearby surface waters or ground waters. If your floor drains discharge to a POTW, you must contact and discuss your activities with them in case you need a permit from the POTW for the discharge. For additional information, refer to the *Discharges to a public wastewater treatment plant* section above or Ohio EPA's ***Do You Know Where Your Floor Drains Go?*** fact sheet.

Additionally, many shops perform vehicle washing as part of their operations. Wastewater from washing vehicles can contain contaminants like detergents, oils, dirt, metals, solvents or other chemicals and is considered industrial wastewater. Options for handling vehicle wash water from your shop include:

- obtain permission to discharge the wastewater to a POTW through a sanitary sewer;
- collect the wastewater from the job site and arrange for disposal at a POTW or industrial waste disposal facility; or
- obtain a permit from Ohio EPA to discharge the wash water on your site (to a creek, river or other water body).

For more information about options for managing wash water, please refer to Ohio EPA's ***Mobile Power Washing and Environmental Regulations*** fact sheet.

If your floor drains discharge to waters of the state you must stop these discharges and obtain a permit from Ohio EPA or find another way to manage your wastewater.



Vehicle wash water from your shop is industrial wastewater and **cannot** be discharged on-site without a permit from Ohio EPA. Even when using biodegradable soaps or detergents, your wastewater is still defined as an industrial wastewater and must be properly managed.

## Wastewater Discharge Requirements Self-Assessment Check

Any shaded areas indicate the need for further assessment or identifies a potential compliance area that should be addressed. Need help determining your compliance with regulations or determining your next steps? Contact OCAPP at (800) 329-7518 for free and confidential assistance.

Self-Assessment Check – Wastewater Discharge Requirements		
1) Does your shop generate industrial wastewater?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2) Do you know where your wastewater and floor drain discharges go?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
3) If your wastewater goes to a creek, river or other water of the state, do you have an NPDES permit from Ohio EPA?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
4) If your wastewater goes to a POTW, do you have permission or a permit for the discharge?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
5) Does your process wastewater go to a dry well, cesspool, septic tank or leach field?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
6) Does your wastewater go to a storm drain?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
7) Do you discharge wastewater outside on the ground?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
8) If your shop has its own on-site septic system for discharges from restroom sinks, toilets etc.:		
a) Has your septic system been approved and permitted by Ohio EPA?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
b) Do you make sure that only sanitary wastewater from restrooms and sinks is sent to the septic system (no process wastewater or chemicals)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

## Underground Storage Tank Requirements

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

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



Tanks installed after 1998 are required to have leak detection systems. UST owners and operators are responsible for reporting and cleaning up any releases. UST systems must be registered with the State Fire Marshal's Office. Financial assurance is also required for UST operators to ensure that adequate funds are set aside to cover the costs associated with a leak or cleanup.

In addition, a certified tank installer must oversee any installation, removal or repair of an underground tank. A permit from BUSTR is required for any installation, upgrade, major repair or closure of an underground tank. There are also closure guidelines for tanks that are taken out of service, removed or closed. More information on the BUSTR program can be found on the Ohio State Fire Marshal's [BUSTR website](#) or see the appendix for additional information.

## Spill Prevention Control and Countermeasure Requirements

If you handle oil or oil products at your shop, you could be subject to the Spill Prevention Control and Countermeasure (SPCC) rules. These regulations require that companies prevent and contain discharges of oil or petroleum products.

### Oil Spill Prevention

If you have any of the following oil storage capacities, you are subject to the SPCC rules:

- a total aboveground storage capacity of 1,320 gallons; or
- more than 42,000 gallons underground storage capacity (this excludes tanks regulated under BUSTR).

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

In determining whether these rules apply, you must consider the capacity of your tanks or containers and not the actual amount of oil stored. If you store oil in containers that are less than 55 gallons in size, you do not need to include these in calculating your SPCC storage capacity. Under these rules, the definition of oil is very broad and includes animal, vegetable and soluble oils. Other common oil and petroleum products that are regulated include heating oil, crude oil, mineral oil, gasoline and diesel fuel.

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

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

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

You must have the plan certified by a professional engineer if engineering work is involved. If your SPCC plan is very simple in nature and does not require engineering work, you as the owner or operator may self-certify. Please contact the [Ohio Board of Registration for Professional Engineers and Surveyors](#), U.S. EPA, or see our [SPCC fact sheet](#) for more information. The plan is to be reviewed every five years, or whenever there is a change at the business. The written SPCC plan must also be submitted to U.S. EPA whenever there is a spill of 1,000 gallons or more, or two releases of more than 42 gallons each within a 12-month period.

## Spill Prevention Control and Countermeasure Requirements Self-Assessment Check

Any shaded areas indicate the need for further assessment or identifies a potential compliance area that should be addressed. Need help determining your compliance with regulations or determining your next steps? Contact OCAPP at (800) 329-7518 for free and confidential assistance.

Self-Assessment Check – Spill Prevention Control and Countermeasure Requirements		
<b>Oil Spill Prevention</b>		
1) If you store used oil or petroleum products (for example, gas, diesel fuel):		
a) Do you have a total above-ground used oil storage capacity of 1,320 gallons or more?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
b) Do you have more than 42,000 gallons of underground used oil storage capacity?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
c) If you have any of the above capacities, are you in compliance with SPCC requirements?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
d) If you've had any spills of used oil or petroleum products, have they been promptly cleaned up?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

## Appendix A: Glossary of Environmental Terms

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

**Conditionally Exempt Small Quantity Generator (CESQG):** Generators of less than 220 pounds (roughly ½ of a 55-gallon drum) per month of hazardous waste.

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

**EPA Identification Number:** A 12-character, site-specific identification number required by small and large quantity hazardous waste generators.

**Hazardous Air Pollutants (HAPs):** A list of 188 air pollutants that are known or suspected to cause cancer or other serious health effects.

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

**Large Quantity Generator (LQG):** Facility that generates 2,200 pounds (roughly five 55-gallon drums) or more of hazardous waste, or more than 2.2 pounds of acute hazardous waste in a calendar month.

**National Pollutant Discharge Elimination System (NPDES):** A provision of the Clean Water Act that prohibits discharge of pollutants into waters of the United States unless a permit is issued.

**Pollution Prevention (P2):** The use of source reduction techniques to reduce risk to public health, safety, welfare and the environment and, as a second preference, the use of environmentally sound recycling to achieve these same goals. P2 addresses all types of waste and environmental releases to the air, water and land.

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

**Publicly Owned Treatment Works (POTWs):** Public sewage/wastewater treatment facilities. POTWs are owned and operated by cities or municipalities.

**Sanitary Waste:** Waste discharged from sinks, showers, kitchens, rest rooms or other non-industrial operations.

**Small Quantity Generator (SQG):** A facility that generates more than 220 pounds and less than 2,200 pounds (more than ½ of a 55-gallon drum but less than five 55-gallon drums) of hazardous waste in a calendar month.

**Treatment, Storage or Disposal Facility:** An Ohio EPA-permitted facility that conducts hazardous waste treatment, storage or disposal activities.

**Volatile Organic Compounds (VOCs):** Organic chemical compounds that under normal conditions significantly vaporize into the air. VOCs typically are industrial solvents.

**Universal Wastes:** Specific hazardous wastes that a generator can choose to manage in an alternative manner instead of the more complex hazardous waste requirements.

## Appendix B: Helpful Web Links and Additional Information

### General/Ohio EPA

[\*Ohio EPA district offices\*](#)

[\*Ohio EPA Recyclers and Environmental Service Providers database\*](#)

### Air Permitting-General

Ohio EPA fact sheet [\*Does My Small Business Need an Air Permit?\*](#)

[\*Ohio EPA District Office of Local Air Agency Contacts\*](#)

### Air Permit Exemptions

Ohio EPA fact sheet [\*Air Permit Exemptions\*](#)

Air Permit Exemptions and Permits-by-Rule [\*\(OAC\) 3745-31-03\*](#)

Ohio EPA fact sheet [\*Permit-by-Rule for Air Pollution Sources\*](#)

Ohio EPA fact sheet [\*Permit-by-Rule \(PBR\) for auto body refinishing\*](#)

Ohio EPA de minimis air permit exemption [\*\(OAC\) 3745-15-05\*](#)

### Air Rules

Ohio EPA air rules for commercial motor vehicle and mobile equipment refinishing operations [\*OAC 3745-21-18\*](#)

Ohio EPA particulate matter rule [\*\(OAC\) 3745-17-11\*](#)

Ohio EPA volatile organic compounds from stationary sources rule [\*\(OAC\) 3745-21-09\*](#)

[\*National Emission Standards for Hazardous Air Pollutants \(NESHAP\) \(40 CFR 63, Subpart HHHHHH\)\*](#)

### Refrigerant

[\*U.S. EPA requirements for services vehicle air conditioning systems\*](#)

[\*U.S. EPA Section 609 technician training and certification programs\*](#)

[\*U.S. EPA Section 609 certified refrigerant recovery equipment\*](#)

### Open Burning

[\*Ohio EPA open burning rules\*](#)

### Hazardous Waste

[\*Ohio EPA hazardous waste rules\*](#)

Ohio EPA fact sheet [\*Identifying Your Hazardous Waste\*](#)

Ohio EPA fact sheet [\*Are You Properly Managing Your Hazardous Waste\*](#)

[\*Hazardous waste generator categories table\*](#)

[\*Hazardous waste generator requirements summary table\*](#)

[\*Hazardous waste recordkeeping requirements table\*](#)

[\*Notice of Regulated Waste Activity Form \(also known as a RCRA Subtitle C Site Identification Form or Form 9029\)\*](#)

### Universal Waste

[\*Ohio EPA universal waste webpage\*](#)

[\*Ohio EPA fluorescent lamps webpage\*](#)

Ohio EPA fact sheet [\*Managing Fluorescent Lamps\*](#)

### Solvent Contaminated Wipes

Ohio EPA [\*solvent-contaminated wipes rule\*](#)

Ohio EPA fact sheet [\*The Management of Solvent Contaminated Rags and Wipes\*](#)

### Empty Containers

Hazardous waste rules for residues of hazardous waste in empty containers ("RCRA empty" rule) [\*\(OAC\) 3745-51-07\*](#)

### Used Oil

Ohio EPA used oil management standards [\*\(OAC\) 3745-279-20 to 24\*](#)

Ohio EPA fact sheet [\*Burning Used Oil in a Space Heater - for Business\*](#)

### Oil Spill Prevention

Ohio EPA fact sheet [\*Understanding the Spill Prevention, Control and Countermeasure \(SPCC\) Requirements\*](#)



**Gasoline Dispensing Facilities**

[\*Ohio EPA requirements for gas stations\*](#)

**Underground Storage Tanks**

Ohio State Fire Marshal [\*Bureau of Underground Storage Tanks Regulation \(BUSTR\)\*](#)

**Scrap Tires**

[\*Ohio EPA scrap tire webpage\*](#)

**Lead Acid Batteries**

Ohio EPA lead acid battery rule [\*\(OAC\) 3745-266-80\*](#)

**Wastewater**

[\*Ohio EPA wastewater permit-to-install \(PTI\) webpage\*](#)

[\*Ohio EPA NPDES general permits webpage\*](#)

Ohio EPA fact sheet [\*Do You Know Where Your Floor Drains Go?\*](#)

Ohio EPA fact sheet [\*Mobile Power Washing and Environmental Regulations\*](#)

**Public Water Systems**

[\*Ohio EPA public water systems webpage\*](#)

## Appendix C: Example Materials and Waste Container Labels

These labels are provided as examples and should not be seen as ensuring compliance with all applicable rules regarding materials and waste management. Please review all applicable rules to ensure that your shop is in compliance.

**HAZARDOUS WASTE**

FEDERAL LAWS PROHIBIT IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE OR  
PUBLIC SAFETY AUTHORITY OR THE  
U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERATOR INFORMATION:

NAME: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

CITY \_\_\_\_\_ STATE \_\_\_\_\_ ZIP \_\_\_\_\_

EPA ID NO. \_\_\_\_\_ EPA WASTE NO. \_\_\_\_\_

ACCUMULATION START DATE \_\_\_\_\_ MANIFEST TRACKING NO. \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

**HANDLE WITH CARE!**

**USED  
OIL**

**UNIVERSAL  
WASTE LAMPS**

**UNIVERSAL  
WASTE LAMPS**

**UNIVERSAL  
WASTE  
BATTERIES**

**UNIVERSAL  
WASTE  
BATTERIES**

UNIVERSAL  
WASTE  
ANTIFREEZE

UNIVERSAL  
WASTE  
AEROSOL  
CONTAINERS

UNIVERSAL  
WASTE PAINT

PAINT-  
RELATED  
UNIVERSAL  
WASTE

EXCLUDED  
SOLVENT  
CONTAMINATED  
WIPES

EXCLUDED  
SOLVENT  
CONTAMINATED  
WIPES

## Appendix D: Commercial Recycling Services and Facilities Accepting Hazardous Waste

Ohio EPA maintains a searchable database of *commercial recycling facilities*, including:

- commercial facilities accepting hazardous waste;
- antifreeze recycling services;
- used oil recyclers;
- oil filter recycling and transportation services;
- lamp recyclers; and
- refrigerant reclaimers and handlers.

Please note that this list is only a partial representation of providers and is updated periodically. This list should not be seen as an endorsement or approval of the businesses by Ohio EPA. You are encouraged to research the compliance status of any business you utilize. For more information, contact Ohio EPA's Office of Compliance Assistance and Pollution Prevention at (800) 329-7518 or visit [\*OCAPP's webpage\*](#).



## Appendix E: De Minimis Example Emissions Calculations and Documentation

A *de minimis* air contaminant source is one that emits less than 10 pounds per day of air contaminants and less than one ton per year of hazardous air pollutants. A source that is *de minimis* does not need an air pollution permit from the Ohio EPA.

*Disclaimer: This appendix is a tool to help companies claim and document a de minimis exemption. The examples provided are for information only, and do not guarantee compliance with all applicable state and federal environmental regulations.*

### De Minimis Air Pollutant Emission Calculations

\*Example Only – Actual Data May Vary

Company: ABC Body Shop, Inc.

Equipment Description: Paint spray booth with exhaust filters.

Control Equipment: Paper exhaust filters

Normal Operating Schedule: 8 Hrs./day 2000 Hrs./year (1 shift)

Basis for Calculations: Material Balance  
Historic records for shop paint and solvent use  
SDS for paints, reducer, and solvents

#### **Actual Daily Emissions:**

##### VOC of paints and solvents used:

1. Sherwin-Williams Polane Topcoats (various colors): 4.8 lbs. VOC/gal. max. per SDS
2. Sherwin-Williams Primer: 4.9 lbs. VOC/gal. per SDS
3. Reducer for paints: 6.71 lbs. VOC/gal. per SDS

##### Maximum daily usage (from historic records)

Primer: 0.5 gallon/day

Topcoats: 0.5 gallon/day

Reducer/cleanup: 0.5 gallon/day

Emissions from Primer = (4.9 lbs. VOC/gal) (0.5 gal/day) = **2.45 lbs. VOC/day**

Emissions from Topcoats = (4.8 lbs. VOC/gal) (0.5 gal/day) = **2.4 lbs. VOC/day**

Emissions from Reducer/Cleanup = (6.71 lbs. VOC/gal) (0.5 gal/day) = **3.36 lbs. VOC/day**

Total actual daily emissions = 2.45 + 2.4 + 3.36 = **8.21 lbs. VOC/day**

**Potential Daily Emissions at 24 hrs./day (3 shifts)** = 8.21lbs VOC/day x 3 = **24.6 lbs. VOC/day**

#### **Summary:**

Actual emissions are less than 10 lbs. per day, but potential emissions can exceed 10 lbs. per day. Therefore, to claim *de minimis* status per OAC 3745-15-05, the company must keep records to show that emissions are maintained below 10 lbs. per day.

Description of records kept: Daily log of paint, reducer, and cleanup usage and resulting emissions.

Completed by: James Doe, ABC Body Shop

Date: August 10, 2018

## Daily Paint and Solvent Usage Record and Emissions Tracking Sheet

Company Name: ABC Body Shop, Inc.

Month/Day	Paint ID	VOC content (lbs./gal) (A)	# gallons (B)	Reducer/ Thinner ID	VOC content (lbs./gal) (C)	# gallons (D)	Total VOC emissions, lbs./day = [(A) x (B)] + [(C) x (D)]  (<10 lbs./day for de minimis tracking)
2/22/08	SW red 5602 SW primer	4.55 4.9	0.2 0.1	SW auto solve 100	6.7	0.2	$4.55(0.2) + 4.9(0.1) + 6.7(0.2)$ = 2.74
3/18/08	SW red 5421 SW primer	4.6 4.9	0.2 0.1	SW auto solve 100	6.7	0.2	$4.6(0.2) + 4.9(0.1) + 6.7(0.2) =$ 2.75
4/6/08	SW green 5701 SW primer	4.73 4.9	0.1 0.1	SW auto solve 100	6.7	0.2	$4.73(0.1) + 4.9(0.1) + 6.7(0.2)$ = 2.30
4/10/08	SW silver 5800 SW primer	4.55 4.9	0.3 0.1	SW auto solve 100	6.7	0.4	$4.55(0.3) + 4.9(0.1) + 6.7(0.4)$ = 4.56
5/18/08	SW blue 1177	4.8	0.3	SW auto solve 100	6.7	0.1	$4.80(0.3) + 6.7(0.1) =$ 2.11
7/9/08	SW silver 5566	4.35	0.2	SW auto solve 100	6.7	0.1	$4.35(0.2) + 6.7(0.1) =$ 1.54
7/27/08	SW red 5602 SW primer	4.55 4.9	0.2 0.1	SW auto solve 100	6.7	0.2	$4.55(0.2) + 4.9(0.1) + 6.7(0.2)$ = 2.74
8/5/08	SW primer	4.9	0.5	SW auto solve 100	6.7	0.2	$4.9(0.5) + 6.7(0.2) =$ 3.79
8/22/08	SW black 9909	4.6	0.5	SW auto solve 100	6.7	0.3	$4.60(0.5) + 6.7(0.3) =$ 4.31
9/10/08	SW red 5602 SW primer	4.55 4.9	0.2 0.1	SW auto solve 100	6.7	0.2	$4.55(0.2) + 4.9(0.1) + 6.7(0.2)$ = 2.74
10/22/08	SW primer	4.9	0.5	SW auto solve 100	6.7	0.2	$4.9(0.5) + 6.7(0.2) =$ 3.79

## Daily Paint and Solvent Usage Record and Emissions Tracking Sheet

Company Name: \_\_\_\_\_

Month/Day	Paint ID	VOC content (lbs./gal) (A)	# gallons (B)	Reducer/ Thinner ID	VOC content (lbs./gal) (C)	# gallons (D)	Total VOC emissions, lbs./day = [(A) x (B)] + [(C) x (D)] (<10 lbs./day for de minimis tracking)



Mike DeWine, Governor  
Laurie A. Stevenson, Director  
Division of Environmental and Financial Assistance (DEFA)  
Office of Compliance Assistance and Pollution Prevention (OCAPP)  
50 W. Town Street, Suite 700  
P.O. Box 1049  
Columbus, Ohio 43216-1049  
Telephone: (800) 329-7518 or (614) 644-3469  
[epa.ohio.gov/ocapp](http://epa.ohio.gov/ocapp)

Please contact OCAPP with your comments and suggestions about this guide.  
Ohio EPA is an Equal Opportunity Employer  
Printed on recycled paper  
Publication date: February 2019