

Guidance for Owners/Operators of Automotive Collision Repair Shops

OCAPP and DHWM Guidance Document

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What is the purpose of this guidance document?

The purpose of this guidance is to help operators of automotive collision repair shops determine what Ohio EPA information they are required to include in their annual operating license registration form for the Ohio Board of Motor Vehicle Collision Repair Registration.

How do I know if I need a hazardous waste ID number?

If you generate more than 220 pounds (approximately ½ of a 55-gallon drum) of hazardous waste per month, you must obtain a hazardous waste ID number (also referred to as a U.S. EPA ID number). This number is different from the air pollution facility ID number discussed later in this guidance.

If you generate less than 220 pounds of hazardous waste per month, you do not need a hazardous waste ID number. You can enter **Not required - CESQG** in the EPA Hazardous Waste Generator No. box on the Ohio Board of Motor Vehicle Collision Repair Registration application form.

How do I know if the waste I generate is hazardous waste?

Material that can no longer be used is considered a waste. The hazardous waste rules require you to determine if any of your wastes are hazardous. Your waste may be classified as hazardous if it is:

- a listed hazardous waste, or
- a characteristic hazardous waste.

Any waste that appears on the lists published in Ohio's hazardous waste regulations (OAC rules 3745-51-31 through 3745-51-33) is a listed hazardous waste. Waste that does not appear on the lists may still be regulated if it has any of the following four characteristics.

Ignitable — Has a flash point less than 140° F; can pose a fire hazard; can irritate the skin, eyes, and lungs; and may give off harmful vapors. Gasoline and paint are ignitable.

Corrosive — Has a pH of less than or equal to two or greater than or equal to 12.5. For example, most acids are corrosives that can eat through metal, burn skin on contact, and give off vapors that burn the eyes.

Reactive — A reactive material can explode or create poisonous gas when combined with other chemicals or with water.

Toxic — Toxic substances contain high levels of certain contaminants (such as heavy metals, pesticides, and other chemicals) which can cause illness and even death if swallowed or absorbed through the skin. Contaminated antifreeze, fluorescent lamps and electronic equipment can all be toxic.

If you know enough about the waste you are generating, you can use your knowledge of the waste to determine if it is hazardous. If not, you may have to send a sample of the waste to a laboratory.

How do I know how much hazardous waste is generated at my shop?

You must add the total weight of all the hazardous waste streams (listed and characteristic) generated at your facility each calendar month.

Why is the amount of hazardous waste I generate per month important?

The more hazardous waste you generate, the more requirements apply to you. If you generate less than 220 pounds of hazardous waste each month, you are a Conditionally Exempt Small Quantity Generator (CESQG). CESQGs do not need an EPA Hazardous waste ID number but they still must send all hazardous waste to a permitted hazardous waste facility for treatment and disposal.

As a CESQG you can write **Not required - CESQG** in the Hazardous Waste Generator No. box on your Ohio Board of Motor Vehicle Collision Repair Registration Application for Registration form.

If you generate between 220 and 2,200 pounds (or about 27 to 270 gallons) of hazardous waste in one month you are a Small Quantity Generator (SQG). If your facility generates more than 2,200 pounds of hazardous waste in one month you are a Large Quantity Generator (LQG). SQGs and LQGs must obtain a hazardous waste ID number and comply with all applicable hazardous waste rules.

How do I obtain a hazardous waste ID number?

To get a hazardous waste ID number, you must send a fully completed, signed copy of EPA Form 9029 to Ohio EPA. The form is available online at www.epa.state.oh.us/dhwm/notiform.html or by contacting Ohio EPA for a hard copy. If you have questions about obtaining a hazardous waste ID number, contact Tammy McConnell by e-mail at tammy.mcconnell@epa.state.oh.us or phone at (614) 644-2922.

Upon receiving your completed form, Ohio EPA will assign your facility a 12-digit hazardous waste ID number. If your facility was previously assigned a number under another owner, the number will be reactivated with your current information. It may take several weeks for you to get written confirmation of your ID number. If you need confirmation sooner, please put a note in the Comment Section of the form so Ohio EPA can contact you when the number has been issued.

Air Pollution

How do I know if I need an air pollution facility ID number?

If you operate any equipment that requires an air permit, you need an air pollution facility ID number. Ohio EPA assigns this number to facilities when they apply for an air permit or permit-by-rule. If your shop does not have or need an air permit or a permit-by-rule, it does not need an air pollution facility ID number. As mentioned previously, this number is different from the 12-digit hazardous waste ID number.

How do I know if I need an air permit?

Examples of equipment that may need an air permit include paint booths, solvent parts washers, and abrasive grinding or blasting operations. However, not all of this equipment automatically needs a permit - it depends on the size of the equipment and the amount of pollutants (emissions) being released. For all your shop's operations, you should look at the following three categories to see where each air pollution source fits:

Permit exemptions - You do not need to notify Ohio EPA to claim a de minimis or listed exemption.

- *De minimis exemption* - If you can demonstrate that the equipment or operation does not emit more than 10 pounds per day of air pollutants, this is classified as a de minimis source of air pollution and it does not need an air permit. However, you must keep records to prove your emissions remain below 10 pounds per day.

For paint booths, VOCs (volatile organic compounds) are released when painting or cleaning spray guns. You can calculate your daily emissions by multiplying the amount of paint and solvent you use each day by the corresponding VOC content of the material (from the Material Safety Data Sheet). Examples of equipment that may meet the definition of de minimis include:

- Low-usage paint booths (using about 1.5 gallons or less of total paint and solvent per day);
 - Used oil burners rated less than 500,000 Btu per hour (provided only used oil generated on the premises is burned);
 - Intermittent welding operations.
- *Listed exemption* - The rule lists more than 45 types of equipment that are exempt from permitting. Examples of exempt equipment include:
 - Solvent recycling units less than 20 gallons capacity;
 - Self-contained abrasive blasting cabinets;
 - Parts washers having a liquid surface area less than or equal to ten square feet and not using methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform;
 - Parts washers using detergent cleaners;
 - Abrasive grinding operations having dust collection systems.

If you are claiming either the de minimis exemption or one of the listed exemptions, you will not have an air pollution facility ID number.

Permit-by-Rule (PBR) - This is an optional exemption for shops that use HVLP or electrostatic spray equipment, have two or fewer spray booths and have exhaust stacks meeting certain criteria. The PBR requires good housekeeping practices and annual records of paint and solvent usage. To obtain coverage under the PBR, you must complete and submit a simple, one-page notification form to Ohio EPA.

Once Ohio EPA receives and approves your PBR request, you will receive a 10-digit air pollution facility ID number. You can find your air pollution facility ID number on Ohio EPA's Web site at www.epa.state.oh.us/dapc/pbr/permitbyrule.html

Permit-to-Install (PTI) and Permit-to-Operate (PTO) - If you cannot use the exemptions or PBR, you must get an air permit. You must apply for and receive your PTI before installing the equipment. A renewable PTO is required for operation. The PTI and PTO contain your air pollution facility ID number. If you do not have a permit but discover through the steps above that you are operating equipment that needs one, you must apply for both a PTI and PTO.

What do I enter on the Ohio Board of Motor Vehicle Collision Repair Registration application form on the "EPA Air Pollution Permit Status" line?

If your facility has previously obtained a PTI, PTO or registered for the PBR, you should already have an air pollution facility ID number. The number will be listed on the permit or associated documentation. If you don't know the number, contact your Ohio EPA district office or local air agency.

Facilities with an existing PTI or PTO should check the **Have Air Permit** box and enter the 10-digit air pollution facility ID number listed in the permit on the **EPA Air Pollution Permit Status** line. If you submitted a PBR Notification Form and it's not yet listed on Ohio EPA's Web site, check the **Registered for Permit-by-Rule** box and include the date it was mailed. If your shop is exempt as a de minimis air pollution source, check the **De minimis** box. If your business does not paint vehicles, enter **no painting**.

Where can I get more information?

For free assistance with Ohio EPA regulations, you can contact Ohio EPA's Office of Compliance Assistance and Pollution Prevention at (800) 329-7518. You may also contact your local Ohio EPA district office or local air agency.

For more information about the topics covered in this guidance, visit these Web sites:

Getting a Hazardous Waste ID Number:
www.epa.state.oh.us/dhwm/notiform.html

Air Permit Exemption Information:
www.epa.state.oh.us/dapc/fops/addinfo.html

Hazardous Waste Generator Handbook:
www.epa.state.oh.us/dhwm/pdf/gen_handbook.pdf

Air Permit-by-Rule Information and Forms:
www.epa.state.oh.us/dapc/pbr/permitbyrule.html

Compliance Guide for Auto Body Shops
www.epa.state.oh.us/ocapp/sb/publications/collisionrepair.pdf