



Preventing Pollution in Collision Repair

A Guide to Environmental Compliance and Pollution Prevention for Collision Repair Shops in Missouri.

As environmental protection becomes more and more important, industries of every type are faced with some big questions.

What environmental regulations apply to me and my facility?

How do I comply with those regulations?

Are there things I can do to reduce the number of regulations I must meet?

How can I protect myself from fines and liability?

How do I protect myself and my workers from environmental hazards in the shop?

This publication can help collision repair shops in Missouri answer some of those questions. The fact sheets provide basic information about regulatory requirements and suggestions for protecting yourself, your workers and the environment through pollution prevention.

Each topic deals with a separate issue that you may face in your collision repair shop. After reviewing them you should be able to decide if you need more information or help on a particular issue. If you do repairs other than body work, you may need a copy of *Preventing Pollution in the Vehicle Maintenance Industry* (PUB799). It covers topics such as used oil, antifreeze, parts, washers, etc. Call 1-800-361-4827 to request a free copy or visit the Web at www.dnr.mo.gov/pubs/pub799.pdf.

The Missouri Department of Natural Resources can help you comply with environmental regulations and find ways to prevent pollution. If you need help, call the Division of Environmental Quality at 1-800-361-4827 or (573) 751-6892.

Information for the Collision Repair Industry Pollution Prevention

Collision repair shops deal with many things that can affect the environment. Materials such as paints and solvents can harm the environment and people if they are not properly managed.

State and federal environmental regulations explain what legally can and cannot be done with these materials. The regulations describe how pollution or waste should be controlled, stored, treated or disposed of. A better solution is to prevent the waste or pollution.

What is Pollution Prevention?

Pollution prevention is simply not making the waste or pollutant in the first place. It means doing what we can to reduce the amount and toxicity of the pollution we generate.

Preventing pollution may be something as simple as using a catch-basin to prevent spills or something as complex as redesigning your operation to increase efficiency and reduce waste. Simple things like choosing nonhazardous solvents can protect the environment and reduce the number of environmental regulations you face. Pollution prevention means thinking about the environmental impact of your actions and trying to limit that impact.

Why Prevent Pollution?

When we generate waste or pollution, we must safely and legally manage that waste or pollution. Whether it is household trash or waste from a business, managing wastes costs money. And usually the things we discard are items we bought. A good example is paper towels. We buy them, use them once and then pay again to dispose of them.

If we reduce the amount of waste we generate, we save money. It's as simple as that. Reducing costs is a major reason to prevent pollution. Here are a few others:

- Improved work environment and worker safety.
- Reduced liability.
- Increased efficiency.
- Fewer regulatory requirements.
- Better environmental protection.
- Enhanced marketing and public relations opportunities.

What Can be Done at Collision Repair Shops?

Here are a few general tips:

- Make a list of your wastes. Then try to find a way to eliminate each of them. For example, if you throw away paper towels, consider using washable shop towels.
- Include the cost of disposal when you make purchasing decisions. What looks like the cheapest option may cost more because of disposal or other management costs.
- Don't buy more than you need. The leftovers may become waste.
- Purchase the largest practical container (containers usually end up as waste), but don't purchase more than you need.
- Purchase the least toxic or hazardous product available. Check the material safety data sheets for products you purchase. If the product is toxic or hazardous, ask your supplier for alternatives.
- Use the oldest items first (first in, first out).
- If you do have excess or unneeded materials, see if your supplier can take them back.
- Use drip pans and splash guards where spills frequently occur.
- Fix leaks immediately.
- Keep work areas clean and well organized to help prevent accidents.
- Store materials in a way that keeps them from being damaged.
- Inspect storage areas regularly for leaks.
- Make sure all items are clearly labeled. Store products in original containers.
- Store wastes separately and be sure they are properly labeled to make it easier to reuse or recycle them.
- Store items that could leak in a place where leaks will be contained and easily seen.

Aerosol Cans

Collision repair technicians use aerosol cans for various reasons. Spray cans may contain hazardous chemicals, such as 1,1,1-trichloroethane or toluene. In some cases, the aerosol may be hazardous waste because of what it contains or once contained. It is important to carefully manage this waste to protect human health and the environment.

Aerosol cans are often recycled as scrap metal. If the empty cans are recycled, the can and the residue inside are not considered waste so most hazardous waste regulations don't apply. If the can is not empty, it can still be recycled if the recycler is able to properly capture and manage the remaining contents. However, if the aerosol can contained an acutely hazardous waste such as some pesticides, it is unlikely that the recycler will be able to properly clean the container. These containers will probably require disposal.

If your aerosol cans are empty, you can recycle them or send them to a sanitary landfill for disposal. If you have one or two waste aerosol cans infrequently, you can send them to a sanitary landfill for disposal (even if they are not empty), if the landfill is willing to accept them.

If the can contains pesticide, paint or other hazardous material, you must have approval from the landfill. If you generate more than two cans, you must find out whether the waste you have is hazardous waste and manage it properly.

Ask your supplier to take back any defective cans. The manufacturer can sometimes repackage the materials. Many products are also available in non-pressurized spray bottles or can be purchased in bulk and used in non-pressurized or refillable pressurized sprayers.

Remember

- Aerosol cans may be hazardous waste. You need to find out whether your waste is hazardous and manage it properly.
- Empty cans, and sometimes cans that are not empty, can be recycled. Sometimes the contents can be reused.

Pollution Prevention Options

Preventing pollution instead of treating or disposing of waste can save money, protect the environment and reduce risk to people. Here are some suggestions:

- Decide if you actually need these products. If not, use up what you have and don't purchase any more. If you need it, limit its use and look for aerosol cans that do not contain hazardous chemicals.
- Switch to non-aerosol products if possible, such as manual pump cans or bottles, especially if they can be refilled.
- Use as much of the material as possible, for its intended purpose.
- Purchase only the amount you need.
- Follow label directions to prevent clogging.
- If your aerosol cans contain hazardous materials, look for non-hazardous alternatives.

Air Quality Permits

Most paints and solvents used in collision repair shops contain air pollutants called volatile organic compounds (VOCs). These chemicals help create smog. Many solvents are also hazardous air pollutants (HAPs). These chemicals can harm human health. Welding and sanding can emit metal dust, which also can harm human health.

To protect air quality and human health, the federal, state and some local governments have rules to control air pollution. You need to find out what rules apply to your facility. The Air Pollution Control Program can help you decide what rules apply to you, send you the needed forms and help you fill them out. Call the Air Pollution Control Program at 1-800-361-4827.

The three major air pollution issues affecting you are:

- Construction Permit
- Operating Permit
- Emissions Inventory Questionnaire (EIQ)

Construction Permit

You may need a construction permit before building a new shop or making changes to your existing shop. Adding or changing paint guns, adding on to your building or adding a gun washer are examples of changes that may require a construction permit.

If your shop started construction after May 13, 1982, or if you have made equipment changes since that date, it is possible that you should have had a construction permit. If that is the case, you still need the permit even if the construction is finished.

The construction permit rule for areas in the department's jurisdiction exempts body shops from having to get a construction permit if they meet certain requirements. Local agencies are not required to adopt this exemption, so if you are located in Kansas City, Springfield, City of St. Louis or St. Louis County, check with the local agency to see if your shop requires a construction permit. The exemption applies if painting is done in a totally enclosed, filtered spray booth or a totally enclosed, filtered spray area with an air intake of no more than 100 square feet; the booth or spray area has a fan that operates at all times during painting; the exhaust goes to a stack outside or is recirculated to building air through a carbon adsorber; and booth, stacks and preparation areas are located at least 80 feet from any residence, recreation area, church, school, child care facility; or medical or dental facility. The exemption also requires certain housekeeping practices for handling wastes. Contact the department or another environmental professional for help deciding if you need a construction permit.

Operating Permit

Facilities that could emit large amounts of air pollutants must get an operating permit under the Missouri Air Conservation Law. You need an operating permit if your facility has large potential emissions. Painting operations exempt from construction permits as described in the previous section do not need an operating permit.

Most collision repair shops will not need an operating permit. Even if you do not need an operating permit now, changes at your shop may increase your potential emissions and cause you to need a permit. For help finding out if you need an operating permit, or before you make any changes, contact the department or another environmental professional.

Emissions Inventory Questionnaire

An Emissions Inventory Questionnaire (EIQ) is a form that asks about the equipment you have and the chemicals you use. The information is needed to find out what you must do to protect the air quality in your area. The EIQ is used to calculate the amount of air emissions your shop could have if it operated at full capacity. This is called potential emissions. It is also used to find out your actual emissions for the year. You need to complete an EIQ to find out if you need an operating permit or construction permit unless you meet the requirements for exemption explained in the Construction Permit section of this fact sheet.

On the EIQ you will need to describe how jobs flow through your shop and what equipment you have. You will need to include the type and capacity of each paint gun, gun washer, parts washer and any other equipment that uses paints or solvents. You also will need information from your material safety data sheets (MSDS).

Some businesses need to complete an EIQ every year and pay a fee for their air emissions. Other businesses may need to submit one every five years, but are still required to pay the fee every year. When you first send in an EIQ, you will be told whether you need to submit EIQs in the future.

If you make changes in your operation, such as switching solvents or paints, your EIQ will need to show usage of both the new materials and the old for the calendar year. Changes at your shop may increase your potential emissions and cause you to need a permit. Check with the department or another environmental professional before you make any changes that could affect your potential emissions.

Local Requirements

Some parts of Missouri have local air quality requirements. If your facility is in the City of St. Louis, St. Louis County, Kansas City or Springfield, the local agency will issue permits. These contacts are

<i>City of St. Louis</i>	Division of Air Pollution Control	(314) 613-7300
<i>St. Louis County</i>	St. Louis County Department of Health	(314) 615-8924
<i>Kansas City</i>	Kansas City Health Department	(816) 513-6314
<i>Springfield</i>	Air Pollution Control Authority	(417) 864-1000
<i>Elsewhere in Missouri</i>	Missouri Department of Natural Resources Air Pollution Control Program	(573) 751-4817 1-800-361-4827

Remember

- If you do not meet exemption criteria, you may need a permit.
- If you are required to have a permit, you will need to complete an EIQ.
- If you make changes at your shop, you may need a construction permit.
- Use low-VOC paints when possible and use non-HAP solvents for preparation work. See the Painting, Oil-Based Paints and Clean Air topics in this fact sheet for tips that can help reduce air emissions.

Equipment Cleaning

In many collision repair shops, most of the solvent used is for cleaning paint equipment. In many shops, equipment cleaning is also a good place to reduce solvent use. If you use less solvent, you save money by purchasing less. You also reduce air pollution, protect worker health and cut down on waste.

One way to reduce solvent use is to have a variety of sprayer cup sizes. Using the smallest appropriate sprayer cup will help you avoid having leftover paint. A smaller cup also means you use less thinner for cleaning.

Remove as much paint as possible from the paint cup before rinsing with solvent. Some people use a rubber spatula to scrape out the paint. Using Teflon-lined paint cups can make cleaning easier. Scraping out paint uses much less solvent than filling the paint cup with solvent to remove all the excess paint.

Some shops clean their spray guns by filling the spray cup with solvent and spraying the solvent into the booth filters or into the air. This wastes solvent, increases air emissions and can create more hazardous waste than necessary. If your solvent is a listed hazardous waste, everything it contacts, paint booth filters, masking, etc., will be hazardous waste when disposed. Instead, spray into an enclosed gun cleaning station. Some shops simply spray the solvent into a bucket or another type of container. Then you can reuse the thinner. Also, use a broom straw, cleaning broach or a soft-wood toothpick to clear plugged guns.

Consider using an enclosed gun washing system. A gun washer is similar to a dishwasher. It is designed to hold spray guns and related equipment and cleans by circulating solvent inside a closed chamber. These enclosed gun-washing systems reduce employee time spent cleaning and exposure to hazardous solvents. Also, less cleaning solvent is lost to evaporation. The cost of the gun washer may be offset by savings in labor costs and solvent purchases. Note: Solvent parts washer (not an enclosed gun washer) may be needed to meet additional regulations.

If your workload is large enough, you may want to use two gunwashers. The first washer can be used for the first rinse and the second for the final cleaning. Once the solvent in the first washer is too dirty for use, it can be recycled or disposed and the second can become the primary rinse.

Line cleaning is another area to look at. One way to improve line-cleaning efficiency is to introduce turbulence into the solvent going through the line during cleaning. Equipment that forces alternating pulses of solvent and compressed air is one way to do this. Payback on this equipment can come from increase production output through more rapid color changes and from decreased solvent use. Also, shorter paint lines require less cleaning solvent and produce less waste paint. When you must use solvent-based cleaners, use the smallest amount that will do the job.

There are estimates that as much as 40 percent of solvents are lost due to evaporation, equipment leaks, spills or inappropriate use. Check regularly for leaks, drips and spills. Keep solvent containers closed when not in use. If possible, try to do your painting in a sequence that will reduce the amount of cleaning between jobs.

Another way to protect the environment and the people in your shop is to use a solvent with a low VOC content. VOCs are "volatile organic compounds," the chemicals in a solvent that get into the air and can harm human health and the environment. Check your material safety data sheet for information on the amount of VOCs. Always look for the material with the lowest VOC content that will do the job.

You should also look for solvents that are nonhazardous. Trichloroethylene, tetrachloroethylene (or perc), methylene chloride, xylene, acetone, methyl ethyl ketone and toluene are some of the solvents that are regulated as hazardous waste. Also, if the solvent has a flash point of less than 140 degrees Fahrenheit, it is a hazardous waste. Check your MSDS, ask your supplier or contact the manufacturer to find out if your solvent is a hazardous waste. If it is, ask your supplier for nonhazardous alternatives.

Remember

- Solvents used in equipment cleaning may cause air pollution and may be hazardous waste.
- Use solvents with the lowest percentage of VOC possible.
- Ask your supplier for nonhazardous solvents.

Fluorescent Bulbs

Your paint shop may use fluorescent lights for overhead lighting. You might also use special fluorescent bulbs for curing paint. You may use high-pressure sodium, mercury vapor, metal halide, neon and high intensity discharge lights. These lights are classified as fluorescent bulbs for this fact sheet. Fluorescent lights typically use less energy and cost less to operate than incandescent lights. However, fluorescent bulbs may contain toxic metals such as mercury, cadmium and lead. When fluorescent bulbs are broken, people may be exposed to toxic levels of mercury vapor and other metals that can be easily inhaled. Various vehicle lights, such as headlamps and dashboard lights, may also contain mercury. These would probably be classified under the broad category of fluorescent bulbs.

The Missouri Department of Natural Resources encourages lamp recycling to protect human health and to limit the amounts of toxic heavy metals entering the environment. Talk to your bulb supplier about recycling options. Also, ask your supplier about low-mercury bulbs.

If your business generates one or two lamps infrequently and you are a conditionally exempt generator of hazardous waste, you may dispose of these in a Missouri sanitary landfill. Before disposal, put the lamp in the box the replacement lamp came in. Put the box in a plastic bag and secure the bag before putting it in the trash dumpster. This will help keep the bulb from breaking and will help protect you and the trash hauler.

Nonhazardous Lamps

If you know your fluorescent lamps are non-hazardous you may send them to a Missouri sanitary landfill or to a lamp recycler. You should contact the landfill operator for permission before disposal. The landfill operator can refuse any waste. The landfill may ask you to fill out a special waste disposal request before accepting the material.

Lamps Sent for Recycling

Businesses in Missouri may send their unbroken lamps to an out-of-state recycler or to a recycler in Missouri that has a valid resource recovery certification from the department. If unbroken lamps are sent for recycling, you do not need to use a licensed hazardous waste transporter in Missouri. You may use a hazardous waste manifest or other shipping papers to record and track your shipments of unbroken lamps.

If you plan to send hazardous lamps to an out-of-state recycler, contact the environmental agencies in the states through which the lamps will travel for their state requirements. Other states may require use of a licensed hazardous waste transporter and a manifest for shipments to a recycler even though Missouri does not.

Hazardous Lamps

Your fluorescent bulbs are subject to hazardous waste regulations if they are broken. They are also subject to these regulations if they are identified as hazardous and discarded rather than recycled. There are two ways to determine if lamps are hazardous.

Test the waste. The test used to find out the toxicity of fluorescent lamps is the toxicity characteristic leaching procedure (TCLP). If the level of any metal is at or above the acceptable level, the lamps are hazardous waste. Acceptable levels are published in Title 40 of the *Code of Federal Regulations* section 261.24 as follows:

- Mercury - 0.2 milligrams per liter (mg/l)
- Cadmium - 1 mg/l
- Lead - 5 mg/l

Apply knowledge of the hazardous characteristic. Data from lamp manufacturers shows that unless they are “low-mercury” bulbs they are likely to be hazardous waste. If you wish, you may assume the lamps are hazardous to avoid the costs of testing. However, your disposal firm may ask for test results before taking your lamps.

The hazardous waste regulations you must meet depend on how much waste you generate. It may be helpful to know that 350 of the standard four-foot long lamps weigh about 220 pounds. If you have over 220 pounds of hazardous waste in a month or at any one time you are regulated as a small quantity generator.

Remember

- Fluorescent bulbs may be hazardous waste.
- Fluorescent bulbs can be recycled.
- Do not break fluorescent bulbs.

Pollution Prevention Options

Preventing pollution instead of treating or disposing of it can save money, protect the environment and reduce risk to people. Here are some suggestions:

- Purchase low-mercury bulbs.
- Protect bulbs from breakage.
- Recycle bulbs.

Glass

While repairing vehicles, collision repair shops often have waste glass from windshields or side windows. This glass is not regulated differently from other wastes; it can be discarded as nonhazardous solid waste at a landfill. But throwing the glass away costs money and uses up valuable resources. A better option is to recycle the glass.

In Missouri there are presently few recyclers of automotive glass. To find recyclers in your area,

- Check the yellow pages of the phone directory.
- Contact your local solid waste or public works office.
- Ask your trade association.
- Check with other businesses in your area.
- Call your newspaper. In some areas, the newspaper publishes lists of recyclers.

If you store glass before recycling, keep it apart from other recyclable materials. Keeping other materials from mixing with the glass makes recycling easier. It may also increase the price the recycler pays or reduce the fee the recycler charges.

Keep the glass in a covered storage area to help prevent the waste pile from becoming a mosquito breeding area. If you plan to dispose of automobile glass, contact your landfill and waste hauler to see if they have any special handling requirements.

Be sure all of your waste goes to a place legally able to accept it. Never try to dispose of waste on your own property. Doing that is bad for the environment and can make it difficult to sell your property. There are serious penalties for illegal waste disposal. You can also reduce the amount of waste glass by repairing small defects instead of replacing the entire glass.

Hazardous Wastes

Most collision repair shops generate some hazardous waste. It is very important that you find out if your wastes are hazardous and that you follow the law when managing the wastes.

What is a Hazardous Waste?

A waste is a material that you no longer use and will discard. It can be a solid, liquid or gas. A waste is hazardous if it has properties that could be dangerous to human health and the environment. Solvents and paints are examples of wastes that could be hazardous.

It is your responsibility to find out if your waste is hazardous. A waste is hazardous if

- It is listed as a hazardous waste in the federal regulations; or
- It exhibits a hazardous characteristic; or
- It is a hazardous waste by Missouri law; or
- It is a mixture of a listed hazardous waste and any other waste.

Listed Hazardous Waste

The federal government publishes lists of hazardous wastes. There are four different lists: The F list, the K list, the P list and the U list. Wastes that are on the P list are called “acutely hazardous” and are regulated more strictly than the other types.

Characteristic Hazardous Waste

Some wastes that are not on the lists may still be regulated hazardous wastes because they have characteristics that make them hazardous. There are four characteristics:

- **Ignitable** - A waste with a flashpoint of less than 140 degrees Fahrenheit, or solids that catch fire easily and burn so rapidly they create a hazard. Some solvents and paint booth filters are ignitable.
- **Corrosive** - A waste with a pH less than or equal to 2.0 or greater than or equal to 12.5. An example is battery acid.
- **Reactive** - Wastes that are normally unstable, react violently with water, can explode or release poisonous gases.
- **Toxic** - Wastes with defined concentrations of certain organic chemicals, heavy metals or pesticides when tested by the toxicity characteristic leaching procedure (TCLP). Some paints contain enough heavy metals that they would be considered toxic hazardous wastes. Broken automotive bulbs may contain mercury.

Missouri-specific Hazardous Waste

An individual state can regulate wastes as hazardous even if they are not on the federal list. For example, in Missouri certain dioxin wastes are regulated at smaller quantities than in the federal rules.

Mixed Waste

If you mix any waste with a waste that is on the F, P, K or U list, all of it is hazardous, even if there is only a very small amount of listed hazardous waste in the mixture.

Is Your Waste Hazardous?

To find out if your waste is hazardous, check to see if it is on the lists of hazardous wastes or if it is a hazardous waste in Missouri. If it is not, you need to find out if it exhibits one or more of the hazardous characteristics. Check the material safety data sheet or contact your supplier for information.

If you are unsure if your waste is hazardous, you will need to have it tested in a laboratory. Contact the department at 1-800-361-4827 for help with this.

Managing Hazardous Wastes

There are very specific requirements for managing hazardous waste from your business. The requirements you must meet depend on what and how much waste you generate. You need to know how much acutely hazardous waste (P-listed) and non-acute hazardous waste you generate each month. You also need to know how much of each of these types of waste you accumulate at any one time.

Use the following information to determine your generator status. See *Hazardous Waste Management* for more information on how to label, store and dispose of your hazardous waste.

What Type of Generator Are You?

There are three types of generators: large quantity generator (LQG), small quantity generator (SQG) and conditionally exempt small quantity generator (CESQG). Here are some general guidelines to help you decide what type of generator you are.

If you generate in one month or accumulate at any one time:

- More than 1 kg (2.2 pounds) of acutely hazardous waste you are an LQG.
- 1,000 kg (2,200 pounds) or more of non-acute hazardous waste you are an LQG.
- More than 100 kg (about 220 pounds), but less than 1,000 kg (2,200 pounds) of non acute hazardous waste and less than 1 kg of acutely hazardous waste you are an SQG.
- Mo more than 100 kg (220 pounds) of non-acute hazardous waste AND less than 1 kg of acutely hazardous waste you are a CESQG.
- In Missouri, anyone generating one gram or more of dioxin waste (2,3,7,8-tetrachlorodibenzo-p-dioxin) is an LQG.

If you are a SQG or LQG you must register with the department and get a generator identification number. You also must follow regulations on storage, transport, record keeping and reporting. Call the department for more information.

Remember

- You are responsible for determining if your waste is hazardous.
- You will need to register as a hazardous waste generator if you generate in a month or accumulate at any one time more than:
 - 1 kg (2.2 lbs.) of acutely hazardous waste, or
 - 100 kg (220 lbs.) of non-acutely hazardous waste, or
 - 1 gram (0.022 lbs.) of dioxin waste.

Note: The federal requirements for hazardous waste can be found in the *Code of Federal Regulations*, Title 40, Part 260 through Part 280 (40 CFR 260-280). The Missouri Hazardous Waste Law is in the *Revised Statutes of Missouri* (RSMo), Sections 260.350-260.552. The hazardous waste rules are in the *Code of State Regulations*, Title 10, Division 25 (10 CSR 25). For more information about the regulations, call the Missouri Department of Natural Resources at 1-800-361-4827 or the federal government's Superfund/RCRA Hotline at 1-800-424-9346.

Hazardous Waste Management

If you generate hazardous waste, and most collision repair shops do, there are requirements for how you manage that waste. The rules you must follow depend on how much waste you generate. Here are the main requirements for small and large quantity generators:

Containers

- Hazardous waste containers must be in good condition. If a container leaks, transfer waste to a new container.
- Don't let rainwater accumulate on top of the container.
- Keep containers closed and use self-closing funnels when adding waste.
- Use containers that are compatible with the waste. For example, use HDPE (high-density polyethylene) plastic containers for corrosive wastes.
- Never place incompatible wastes, such as wastes that react with each other (acids and bases) in the same container.

Storage

- Keep aisle space between container rows to allow inspection for leaks and damage.
- Store ignitable and reactive wastes at least 50 feet from property boundaries.
- Store containers of incompatible wastes in separate areas.
- There are limits on how long you can store your waste.

Labels

- Label every container with the type of waste and whether it is hazardous or non-hazardous.
- Include EPA hazardous waste numbers or Missouri waste code numbers.
- Include the date waste was first placed in the container when the waste is stored next to where it was generated. Put the first date of storage when it is moved to storage.
- Include your business's name and address.
- Use the following words on labels for hazardous wastes:

HAZARDOUS WASTE FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

If found, please contact the nearest police or public safety authority or the U.S. Environmental Protection Agency

(Your business's name and address and manifest document number)

Transport and Disposal

- Make sure your hazardous waste transporter has an EPA identification number and a Missouri Hazardous Waste Transporter License.
- Make sure the place receiving your waste has EPA identification numbers and the necessary state permits.
- Use manifests for hazardous wastes shipped off-site.

Inspections and Record Keeping

- Inspect containers at least once a week and keep a written log of inspections.
- Keep training and inspection records, manifests, shipping receipts and records of lab tests for three years.
- Keep land disposal restriction forms for five years.

Training

- Train all employees to identify, reduce and properly handle wastes.
- Train new employees before they handle hazardous waste.

Notify the Department

- If your business is a small or large quantity generator, register as a generator with the Missouri Department of Natural Resources to get an EPA and Missouri generator identification number.

Emergency Preparedness

- Notify police departments, fire departments and local hospitals. They need to know what hazardous wastes are on your property.
- Designate an emergency coordinator. This person must know what to do in case of a fire, spill or other emergency and must be on the premises or on call 24 hours a day.

Contingency Plans

Large quantity generators must have a written plan for handling emergencies that includes the following. Even if you are not a large quantity generator, having a written plan is a good idea.

- Response arrangements with police, fire, hospitals and emergency response contractors.
- Emergency coordinator's address and phone number(s).
- On-site emergency equipment descriptions and locations.
- Evacuation plan and routes, including a site diagram.

Small and Large Quantity Generators Must Post Emergency Information

Post the following information near every telephone:

- Fire department phone number.
- Emergency coordinator's name and phone number.
- Locations of fire alarms and extinguishers.
- Locations of spill control materials.

Remember

- You must decide if your waste is hazardous and manage it correctly.
- Find ways to eliminate or reduce hazardous wastes. This will reduce the number of requirements you must meet. See the pollution prevention suggestions on other fact sheets, particularly those dealing with paints, solvents and equipment cleaning.

Lead-Acid Batteries

The term “battery” means lead-acid battery.

Lead-acid batteries, such as those from motor vehicles, contain acid and other materials that pose a risk to people and the environment. Missouri’s Solid and Hazardous Waste Management Laws have requirements for managing waste batteries.

Used batteries are banned from sanitary landfill disposal in Missouri. Do not put them in your trash or dumpster. Non-leaking batteries need to be handled in one of three ways.

Recycling Program for Lead-Acid Batteries. The current recycling program for batteries is extremely successful and the requirements are less stringent, so most waste batteries will probably be handled under this program. This program requires battery wholesalers and retailers to accept used batteries from their customers in quantities at least equal to the number of new batteries sold.

No matter how you handle your used batteries, if you sell a battery to someone, you must take their old battery if they want you to. You must then arrange for those batteries to be recycled. Batteries cannot be stored longer than 90 days unless you get approval from the Missouri Department of Natural Resources.

The law also requires anyone selling batteries at a wholesale or retail location to post a sign about recycling batteries. The sign has to be four inches by six inches or larger and must say, “It is illegal to discard a motor battery or other lead-acid battery. Recycle your used batteries. State law requires us to accept used motor vehicle batteries, or other lead-acid batteries for recycling, in exchange for new batteries purchased.”

Universal Waste. Used batteries can be handled as universal waste. This option has more stringent requirements than the recycling option described above. You must send the batteries to a recycling facility, a resource recovery facility or a permitted lead smelter. See the fact sheet about universal waste if you choose to handle batteries as universal waste. This publication can be accessed on the Web at www.dnr.mo.gov/pubs/pub2058.pdf.

Hazardous Waste. Used batteries can be handled as hazardous waste. Cracked or leaking batteries must be handled as hazardous waste. This option is normally the most costly and has the most stringent requirements.

Storage of Used Batteries

If you store batteries, it must be in a way that protects human health and the environment. The safe storage of batteries begins with a suitable location. Batteries should be stored indoors or under cover to keep them dry and prevent damage to the casings caused by freezing and thawing. The storage location should not be where batteries can be hit or run over. Batteries should not be stored near combustibles, such as gasoline, and the storage area needs to be well ventilated. Precautions should be taken to contain spills. One way is to store batteries on or above a sealed concrete floor with a curb. Storage of batteries outdoors may require a storm water permit from the department.

If you are storing batteries, you should have written procedures for handling spills or leaking or cracked batteries. Spills should be neutralized with a material such as agricultural lime, baking soda or a commercial spill kit and be cleaned up immediately. Cracked or leaking batteries should be placed in a container impervious to acid, such as a five-gallon plastic bucket. Anyone handling the batteries or spilled material should wear protective clothing, gloves and eyewear. An eye wash sink or eye flush kit should be available. Cracked or leaking batteries need to be handled as hazardous waste.

Transporting Used Batteries

All used batteries need to meet Missouri Department of Transportation (MoDOT) requirements for transporting hazardous materials. Hazardous waste batteries must be transported using hazardous waste haulers.

(The part of the law dealing with lead-acid batteries is §260.260-260.266, *Revised Statutes of Missouri*.)

Remember

- Do not put batteries in the trash. Batteries must go to a recycling facility, a resource recovery facility or a permitted lead smelter. They cannot go to a landfill.
- Battery acid may be a hazardous waste.

Pollution Prevention Options

Preventing pollution instead of treating or disposing of it can save money, protect the environment and reduce risk to people. Here are some suggestions:

- Store batteries where they will not be damaged or frozen.
- Store batteries so that leaks will be caught and contained.
- Anchor batteries when transporting.
- Use long-life batteries.
- Inspect stored batteries regularly so you can find cracks or leaks before they become a problem.

Mercury Switches

Many vehicles contain mercury switches. They are located in some light switches, ABS braking switches, ride control switches and air bag sensors. Liquid mercury and mercury vapor are hazardous to both humans and the environment. Removal and proper management of mercury switches in vehicles is an important part of keeping mercury out of the environment. Also, make sure the mercury containing device does not break when removed from the vehicle. Mercury containing devices that have broken need to be handled as hazardous waste.

Store the unbroken switches in a leak-proof, closed container in a manner that will prevent the capsule from breaking. Mark the container "Universal Waste-Mercury Switches", "Waste Mercury Switches", or "Used Mercury Switches". Mark the date the first switch is placed in the container. You have a year to send the switches off for recycling. A hazardous waste transporter will not be required in Missouri. Additional requirements will apply if you generate more than 11,000 pounds of universal waste at a time.

If you plan to send the mercury switches to a company out-of-state, contact the environmental agencies in the states through which the switches will travel for their state requirements. Other states may have additional transportation requirements.

If the mercury switch cannot be reused, many of the companies that handle fluorescent bulbs also handle other mercury containing items. A list of companies that can handle fluorescent bulbs. *Fluorescent Bulb Recyclers*, can be found at www.dnr.mo.gov/pubs/pub451.pdf. This list will usually note when the company also accepts other items. If you do not have access to the Web, contact the department to request the document.

The following are Web sites that contain information that might be helpful in mercury switch removal.

- Late model vehicle mercury switches: www.cleancarcampaign.org/mercury.shtml
- List of earlier model vehicles that contain mercury switches: www.epa.gov/region5/air/mercury/list_of_vehicles_with_hg_switch.pdf
- General information on auto switch removal: www.epa.gov/region5/air/mercury/autoswitch.htm#remove

End of Life Vehicle Solutions

The Missouri Department of Natural Resources, in partnership with End of Life Vehicle Solutions (ELVS), a not-for-profit organization, is encouraging salvage yards to remove mercury switches from scrap vehicles before recycling them.

The department is taking a multi-faceted approach and looking for ways to reduce mercury contamination in Missouri. One approach is to ask vehicle recyclers and dismantlers for their help. You can find pellet-sized mercury switches in the lights under trunk and hood compartments and in anti-lock brakes of some vehicles built as late as the 2002 model year.

Mercury is extremely toxic to humans and can affect the central nervous system. If mercury is not properly collected and managed, it can also affect our environment. Removing mercury switches before they are crushed, shredded or melted for recycling will help eliminate additional releases of mercury.

Fish tissue sampling indicates that mercury contamination is widespread and present in fish throughout Missouri. Each year, the Missouri Department of Health and Senior Services issues an advisory for fish consumption. Anyone eating fish contaminated with mercury can be affected, especially pregnant women, nursing mothers and children under 13 years old.

When recyclers and dismantlers join ELVS, they will receive a collection bucket, educational materials, a list of vehicles that potentially contain mercury switches, and detailed instructions for shipping the ELVS buckets. ELVS will arrange for the shipping and recycling of the mercury switches collected at the facility, all of this free of charge to those participating in the voluntary program.

The National Vehicle Mercury Switch Recovery Program was formed as a result of an agreement reached in August 2006 by representatives from the dismantlers, automotive steel and scrap industries, environmental groups and a national group representing state governments and the U.S. Environmental Protection Agency. As part of the program, the auto industry organized the ELVS, a not for profit corporation.

If you have any questions about the ELVS program, call toll-free at (877) 225-ELVS(3587), or send an e-mail to info@elvsolutions.org or visit the Web at www.elvsolutions.org.

Remember

- Properly package and label mercury switches.
- Broken mercury switches must be handled as hazardous waste.
- You must send your mercury switches off for recycling within one year from the time they are deemed a waste.

Painting

Mixing and applying primers, paint and topcoats are key tasks at collision repair shops. The way these tasks are done will affect how much paint and other materials you use and how much waste you make. It is good for the environment and good for business to reduce the amount of these chemicals used and to reduce waste.

Paints, primers and topcoats (paints) usually contain chemicals that cause air pollution. Many of them are also hazardous wastes. If you use less of these coatings, less air pollution is made. This will help the environment and employee health. It can also reduce the number of environmental regulations you have to follow.

Several things affect the amount of paints used and waste made during surface coating. The skill of the operator, the type of coating applied and the type of spray equipment used are all factors. Differences caused by the painter's skill and technique are often greater than the type of coating or gun used. Investing in training for the painters in your shop can help you save money as well as ensuring a good quality product.

Here are some ideas for reducing the amount of paints used and the amount of waste made:

- Use the correct gun setup for the coating to be used and for the size of the area to be covered. Gun settings include fluid tip size, flow rate setting, the air cap type and pressure (psi), and the paint cup psi in pressure cup systems.
- Keep records of the gun type and settings for specific jobs to reduce variations.
- Use paints with low lead, cadmium and chromium content. Using materials with these or other toxic metals will usually make your paint filters hazardous waste. Check the material safety data sheet or ask your supplier for non-hazardous paints.
- Use neutral color primers and sealers to allow easy topcoat coverage.
- Mix paint on-site if possible and mix only the amount needed. As little as one excess pint per day equals approximately \$3,000 added cost per year.
- Keep records of the volumes of paint needed for specific jobs. Estimate the quantity of paint mixed based on these records.
- Apply only the number of coats needed for adequate coverage.
- Consider using liquid overspray masking instead of plastic or paper. It can be sprayed onto car surfaces with existing spray equipment and is removed with water, which normally can be treated with other wastewater. However, if your shop is on a septic system, this is probably not advisable since you will need to capture your wastewater and dispose of it elsewhere.
- Use high efficiency spray equipment. Standard spray guns can waste as much as 80 percent of the paint used. High-efficiency spray guns such as high-volume, low- pressure (HVLP) and electrostatic guns can reduce overspray by as much as 75 percent. These guns still depend on the operator skill level and technique. Proper training for their use is critical.
- Consider installing a computerized mixing system. These systems can accurately mix paint formulas down to very small quantities, eliminating mismatches and reducing the amounts of wasted paint. Payback for such systems can be less than one year, depending on the volume of painting done.

Remember

- Using only the amount of paint needed saves money and protects the environment.
- The skill of the painter is key to reducing paint used and paint waste. Other factors are type of paint and painting equipment.
- Use nonhazardous primers, paints and topcoats whenever possible.

Paint Booth Filters

Used paint booth filters may be hazardous waste. Paint and solvent captured by a filter can cause the used filter to be a hazardous waste depending on the paint and solvents you use and how much you paint.

Usually filters are hazardous because they contain a toxic metal (usually from the paint), they are ignitable (can burst into flames) or they are contaminated with a “listed” hazardous waste (often from spraying solvent into the filter when cleaning spray guns).

To decide if your paint booth filter is hazardous ask yourself the following:

- Does the material safety data sheet show that the paint or other chemicals going into the filter contains toxic metals (particularly cadmium, lead, barium or chromium) or other toxic materials? If the answer is yes, it is very possible that your filters are hazardous waste. You can assume your filters are hazardous or you can do testing.
- Can your supplier or manufacturer provide information stating that your paints or other chemicals going into the filters contain no toxic material? If the answer is no, you should find out the levels from them or do testing.
- Is the paint or other chemicals going into the filters a “listed” hazardous waste? If the answer is yes, the used filters will be hazardous waste. Listed hazardous waste solvents include trichloroethylene, toluene, xylene, acetone, methyl ethyl ketone, methylene chloride and others.
- Could the used filters spontaneously combust (catch on fire without anyone or anything lighting them)? If the answer is yes, the filters are hazardous waste.

Some people dip their used filters in water before storing them to prevent fires. Others spray them with water. If the filters cannot catch fire, they are not ignitable hazardous waste. They could still be hazardous waste for another reason (toxic or listed hazardous waste contamination). If your filter contains a listed hazardous waste and you dip it into water, the water you dipped it in becomes hazardous waste.

Testing Paint Booth Filters

To test your paint booth filter, a laboratory will need to measure the flash point, determine if the filter can spontaneously combust and do a toxicity characteristic leaching procedure (TCLP). The TCLP will only need to test for the toxic chemicals that you expect to find in your paint filter.

The list of regulated toxic chemicals is in the *Code of Federal Regulations*, 40 CFR 261.24. Call the Missouri Department of Natural Resources if you need help finding this list.

To find a laboratory to test your filters for hazardous characteristics, check the yellow pages, ask your vendor or check with your trade association. Be sure the filter is full when it is tested. After you test the filters, you need to test them again when your process changes, for example if you change paints or solvents.

Managing Hazardous Waste

If your filters are hazardous waste, you will need to figure out how much waste you generate. The regulations you must follow depend on how much waste you generate. A few of the basic requirements are discussed here.

Properly store and dispose of used filters. Store them in a closed container clearly marked with the words "Hazardous Waste" and the date you first put waste into the container. Be sure you store them in a way that will prevent fires.

Anyone transporting your hazardous waste must have a Missouri Hazardous Waste Transporter License. There are several types of facilities that can accept hazardous paint booth filters. Always check to be sure the facility receiving your waste can legally accept it.

To get a list of certified resource recovery facilities (recyclers) or hazardous waste facilities in Missouri, contact the department at 1-800-361-4827.

Remember

- Paint booth filters may be hazardous waste. You must find out if yours are.
- If you clean your guns by spraying a listed hazardous waste solvent into your paint booth or filter, your filters become hazardous waste. Spray solvent into a container and reuse it.
- If your paint booth filters are hazardous waste, you must follow hazardous waste regulations.
- Store used paint booth filters safely to prevent fires. If you dip them in water, realize that the water may become hazardous waste.
- Use nonhazardous paints and solvents when possible.

Paint Waste

Waste paint may be regulated as hazardous waste. Some paints contain metals such as lead, cadmium, barium or chromium that cause the paint to be toxic hazardous waste. Your paint may also be an ignitable waste, which means it will catch on fire at less than 140 degrees Fahrenheit. The temperature at which something catches on fire is called the flash point.

The material safety data sheet for the paint should list the flash point. It should also list toxics if they are present in significant amounts. Even if the MSDS does not list any toxics, the paint could still be hazardous waste. Check with your supplier or manufacturer. The regulated levels of toxics are

- Barium 100 mg/l (milligrams per liter)
- Cadmium 1.0 mg/l
- Chromium 5.0 mg/l
- Lead 5.0 mg/l
- Mercury 0.2 mg/l
- Silver 5.0 mg/l
- Methyl ethyl ketone 200mg/l

If the concentration of toxics in your paint is at or above these levels, the paint waste is hazardous waste.

If the MSDS, the supplier or some other authority cannot tell you whether the waste paint is hazardous, you will need to have the paint tested before disposal. The test for toxics is called the toxicity characteristic leaching procedure (TCLP).

You need to test a representative sample of the waste. Be sure to test again if the paint formulation changes.

Keep paint waste separate from solvent waste. If you mix paint waste with a listed hazardous waste solvent, the mixture will be hazardous waste. Some common listed hazardous waste solvents include methyl ethyl ketone, toluene, trichloroethylene, methylene chloride, xylene, acetone and others.

Try to avoid having waste paint. Computerized mixing systems can help assure accurate color matching. Using the smallest paint cup possible reduces the amount of paint left in the cup. If you have off-spec paint, ask your supplier to take it back.

Try to use up paint rather than disposing of it. Some shops mix small amounts of different colors to use as an undercoat.

Disposing of Hazardous Paint Waste

If your waste paint is a hazardous waste, you need to figure out how much you generate. The rules you must follow depend on how much waste you generate. Store hazardous waste in a closed container labeled with the words "Hazardous Waste" and the date waste was first placed in the container.

Anyone picking up your hazardous waste for disposal or recycling must have a Missouri Hazardous Waste Transporter License. You may need a generator identification number and you may have to complete a hazardous waste manifest.

There are several types of facilities that can accept hazardous paint waste. Always check to be sure the facility receiving your waste can legally accept it. To get a list of certified resource recovery facilities (recyclers) or hazardous waste disposal facilities in Missouri, contact the department at 1-800-361-4827.

Disposing of Nonhazardous Paint Waste

If your paint waste is not a hazardous waste, you can dispose of it with your trash if the paint is dry. Landfills in Missouri cannot accept liquids. Check with your landfill to see if they will accept the waste.

To dry the nonhazardous paint, mix absorbent material into it to soak up all the liquid. Kitty litter and sawdust are good absorbents that are inexpensive.

You may have heard that you can dry the paint by letting it evaporate. This is never a good idea and may be illegal. Allowing paint to evaporate like this causes air pollution and poses a risk to anyone around the drying paint. Using an absorbent to dry it is safer and is inexpensive.

Do not put paint or any other chemicals down the drain unless you have permission from the wastewater treatment plant.

Never pour paint or any other waste onto the ground. Doing so can seriously harm the environment and you. Also, there are penalties for illegally disposing of waste.

Remember

- Your paint may be a hazardous waste. You must find out if it is.
- Keep paint waste separate from other wastes.
- Be sure that anyone taking your hazardous waste is legally able to do so.
- Never pour paint or any other wastes onto the ground.

Pollution Prevention Options

Preventing pollution instead of treating or disposing of it can save money, protect the environment and reduce risk to people. Here are some suggestions:

- Ask your vendor for paints that are non-hazardous.
- Mix only the amount of paint needed. Use all the paint you mix.

Plastic Waste

Autobody repair shops often remove damaged plastic parts from vehicles. These wastes are not regulated differently from others. The plastic can usually be discarded as non-hazardous waste at a sanitary landfill. But throwing the waste away in the landfill can cost you money and uses up valuable resources. A better option is to reuse the parts or recycle the plastic.

There are several good sources of information on recyclers. To find recyclers in your area,

- Check the yellow pages of the phone directory.
- Contact your community's solid waste or public works office.
- Ask your trade association.
- Check with other businesses in your area to ask if they know of recyclers.
- Call your newspaper. In some areas, the newspaper publishes lists of recyclers.

If you store plastic items before recycling, store them apart from other recyclable materials. Keeping materials separated makes recycling easier and can sometimes increase the price the recycler pays or reduce the price the recycler charges. Keep the recyclables in a covered storage area to help prevent the waste pile from becoming a mosquito breeding area.

If you plan to dispose of automobile parts, contact your landfill and waste hauler to see if they have any special handling requirements. Never burn plastic or any other waste from your business.

Be sure all of your waste goes to a place legally able to accept it. Never try to dispose of waste on your own property. Doing that is bad for the environment and can make it difficult to sell your property. There are also serious penalties for illegal waste disposal.

Remember

- Be sure all of your waste goes to a place legally able to accept it.
- Do not burn wastes from your business.

Scrap Metal

Collision repair shops deal with a variety of scrap metals. The Missouri Department of Natural Resources encourages recycling of scrap metal. Recycling scrap metal saves energy and landfill space, and reduces air pollution, water use, mining waste and consumer waste. Also, recycling metal saves money and natural resources.

Some vehicle parts such as water pumps, alternators, master cylinders and carburetors may be sold to parts remanufacturers. Remanufacturing saves even more resources than recycling. Keep parts to be remanufactured separate from other scrap metal.

Some scrap metal recyclers will pay more for catalytic converters, so you may want to keep them separate from other scrap metal. Catalytic converters from the exhaust systems of newer automobiles contain platinum, a metal with a higher value than steel.

Scrap metal recyclers usually require the scrap metal to be sorted by type. Iron and steel should be separated from other types of metal such as aluminum, brass and copper. Keep lead, such as tractor wheel weights and wheel balancing weights, separate from other metals.

If you store scrap metals outside, you will need to be particularly careful. What looks like a storage pile to you may look like a dump to someone else. To avoid potential problems, be careful that other wastes are not mixed with scrap metal and set up a regular schedule for removal. Check on city and county ordinances that may have requirements for storing materials outside.

Pollution Prevention Options

Preventing pollution instead of treating or disposing of it can save money, protect the environment and reduce risk to people. Here are some suggestions:

- Remove parts for remanufacture when possible.
- Keep catalytic converters that contain platinum in a separate area.
- Sort metals by type and schedule regular removal of scrap metal.

Solvents

Waste solvents used in paint equipment cleaning make up a big part of the hazardous wastes from collision repair shops. You can help protect the environment, protect workers in your shop and save money by reducing the amount of solvent you use and by reusing or recycling your solvent and by using the least hazardous solvent that will do the job.

Air Pollution From Solvents

Many solvents contain volatile organic compounds (VOCs) and hazardous air pollutants (HAPS). When these VOCs and HAPs get into the air, they can harm people and the environment. The material safety data sheet will have information on the amount of VOCs and hazardous components in the products you buy. Always try to use the material with the lowest percentage of VOCs and fewest hazardous components possible. There are regulations about solvent metal cleaning for both the St. Louis and Kansas City areas.

Missouri has rules to protect air quality. The types of rules that apply to your shop depend on the type and quantity of paints and solvents you use, as well as the size of your operation.

Waste Solvent

Many waste solvents are hazardous wastes. Some used solvents and still bottoms are on a list of hazardous wastes called the F list. Some unused solvents are on the U list.

Common listed hazardous waste solvents include trichloroethylene, tetrachloroethylene (perc), methylene chloride, xylene, acetone, methyl ethyl ketone, toluene and others.

Some used solvents are hazardous because they are ignitable, toxic, reactive or corrosive. If the waste solvent has a flash point of less than 140 degrees Fahrenheit it is an ignitable hazardous waste. The flash point is the temperature at which the solvent will catch on fire.

Waste solvent should be reused, recycled on-site, recycled off-site or, as a last resort, disposed of as a hazardous waste.

Reducing Solvent Waste

Solvents can be expensive to purchase and to dispose of. It makes good sense to try to reduce the amount of solvent you use. Often, the solvent that you use can be reused or recycled, which means you can purchase less new solvent. When you reduce the amount of solvent you use, you save money and you protect the environment.

Here are some ideas for reducing solvent use at your shop:

- Keep solvent containers, parts washers and solvent sinks closed. Any solvent that evaporates at your shop is solvent you paid for and can't use. Some people estimate that as much as 40 percent of solvents are lost due to evaporation, equipment leaks, spills or inappropriate use.
- Set up and follow a maintenance schedule for equipment. This can prevent leaks.
- Check regularly for leaks, drips and spills. Repair leaks and clean up spills right away.
- Schedule paint jobs to reduce the need to clean between jobs.
- Use slightly dirty solvent for the first rinse of equipment.
- Scrape the leftover paint out of the paint cup before you rinse it.
- Use the smallest spray cup that will work so you won't have a lot of leftover paint. You also won't need to use as much solvent to clean a small spray cup.
- When you clean spray guns, spray the solvent into an enclosed area or container so it can be captured and recovered.
- Think about buying or leasing an automatic gun washer. These systems work like household dishwashers. They can reduce employee time spent cleaning, reduce solvent evaporation and reduce exposure hazards.
- Clean guns and nozzles immediately after use. This saves time and solvent.
- Keep solvent containers, parts washers and solvent sinks closed. This is so important the list begins and ends with it.

Remember

- Your solvent may be hazardous waste.
- Use the least hazardous solvent that will do the job.
- Ask your supplier if nonhazardous solvents are available.
- Solvent that evaporates is solvent you paid for and can't use. Keep containers tightly closed and in good condition.

Solvent Disposal

Solvent is expensive to buy and to discard. It makes sense to try to reduce the amount of solvent you use. Reuse or recycle your used solvent. Only as a last resort should you dispose of solvent. Many waste solvents are hazardous wastes. It is very important that you manage your hazardous wastes according to the regulations.

To properly manage your waste solvent you need to

- Find out if your waste is hazardous.
- Figure out how much hazardous waste you generate.
- Learn what rules apply to you based on how much waste you generate.
- Use the services of a waste transporter and disposal or recycling company legally able to take your waste.

Is Your Waste Hazardous?

Some waste solvents are listed hazardous wastes. This means they are on a list from the federal government of wastes regulated as hazardous. Many used solvents and the still bottoms (sludge) from recycling them are on the F list. Commonly used solvents on this list include trichloroethylene, methylene chloride, xylene, acetone, methyl ethyl ketone (MEK), toluene and others.

Some solvents are characteristic hazardous wastes, which means they are ignitable, toxic, reactive or corrosive. If the waste has a flash point of less than 140 degrees Fahrenheit it is an ignitable hazardous waste. The flash point is the temperature at which the solvent will catch on fire.

Your solvent supplier should be able to tell you if your solvent is regulated as a hazardous waste, or you can check with the manufacturer. If you cannot find out from these sources, contact the Missouri Department of Natural Resources or another environmental professional for help. You will need the material safety data sheet listing the chemicals in your solvent and the flash point.

If the solvent is not a hazardous waste, the paint or dirt in it may cause the used solvent to be a hazardous waste. If any contaminant in your used solvent is hazardous, your used solvent may be hazardous waste. Contact the department for more information on this.

If your waste solvent is a listed hazardous waste, anything it is mixed with is hazardous waste. For example, if you spray a listed solvent into your paint booth filters, the filters become hazardous waste.

Managing the Waste

You need to keep track of how much hazardous waste you generate. The rules you must follow depend on how much waste you generate.

Always keep good records about your waste. How much and what you generate, who transports it and where it goes. In most cases, you will need to get a generator identification number from the department and use a manifest when you ship the waste off-site. The company that transports your hazardous waste must have a Missouri Hazardous Waste Transporter License.

Be sure your waste is going to a place that is legally allowed to take it. For a list of hazardous waste facilities in Missouri or a list of resource recovery facilities (recyclers), contact the department at 1-800-361-4827.

If your waste solvent is not a hazardous waste, check the MSDS for recommended disposal methods. Do not put liquids in your trash. Landfills in Missouri cannot accept liquid waste.

If the drains at your shop lead to a sewer and wastewater treatment plant, you may be able to pour water-based solvents down the drain. Contact the wastewater plant to ask if they can accept the water-based solvent. Do not put solvent, paint or other chemicals down the drain unless the wastewater plant has approved. Do not put solvent or any industrial waste down your drain if the drain does not lead to a wastewater treatment plant.

Never pour solvent or any other waste onto the ground. Doing that can seriously harm the environment and you. Also, there are serious penalties for illegally disposing of waste.

Remember

- Find out if your waste solvent is a hazardous waste. Ask your supplier for nonhazardous solvents.
- Be sure anyone who takes your waste is legally able to do so.
- Never pour any waste onto the ground and never pour any chemicals down the drain unless you have permission from the wastewater plant.

Solvent and Paint Recycling

Whether you recycle your solvent or paint on-site or have someone pick it up for recycling elsewhere, recycling your used solvent and paint helps protect the environment and can save money. You need to find out if your used solvent and paint is regulated as hazardous waste.

The following information deals with recycling hazardous waste solvent and paint. If your used solvent and paint is not hazardous waste, check with your recycling equipment vendor for information on managing wastewater and waste from the recycling unit. You can also call the Missouri Department of Natural Resources for help.

On-Site Recycling

Most on-site recycling of solvent and paint is done with a distillation unit called a still. Used solvent or paint is put in the still and heated to the boiling point. The solvent vapor is then cooled, producing nearly pure solvent. There are also recycling units that filter the used solvent. Most recycled solvent is used for gun washing.

To figure the cost savings from on-site recycling, consider the cost of new solvent and the cost of off-site recycling. In general, shops that generate 50 gallons of waste solvent per month will get their money back on a small still in just over one year. We do not have figures on the paint still.

You need to contact the department before you begin recycling your solvent or paint on-site. For small amounts, you need to notify the department's Hazardous Waste Program at P.O. Box 176, Jefferson City, MO 65102. Send a letter that includes your name, the name and location of your facility, the wastes being recovered and the approximate quantity of waste recovered each year.

If you recycle more than 1,000 kilograms (2,200 pounds) on-site in a month, you must send an application to the department for a resource recovery certification. Contact the department to get an application form. There is a \$100 application fee. In addition, large recyclers with a batch capacity of 150 gallons or more may need an air pollution control permit. Contact the Air Pollution Control Program for more information.

After the solvent or paint is distilled, there will be some settled residue called still bottoms. This material is often a hazardous waste. If your recycling unit filters used solvent, the used filters may also be hazardous waste. Store the waste still bottoms or filters in a closed container labeled with the date you first put the waste in the container and the words "Hazardous Waste." All hazardous wastes from your recycling activities must be properly handled and disposed.

Some recyclers have mobile recycling services. They bring equipment to your shop and recycle your solvents there. These businesses must have resource recovery certification in Missouri. If you use this type of service, ask the recycler to give you a copy of the approval letter from the department.

Off-site Recycling

You may choose to recycle waste solvents and paints off-site with a commercial recycler. Some businesses will transport and recycle your solvent. Other recyclers offer a solvent tank maintenance service. They will come to your shop, remove the solvent and sludge from your tank and replace it with clean solvent. Solvent recycling facilities in Missouri must have resource recovery certification.

If you send your waste solvent or paint off-site, whether for recycling or disposal, you need to follow all hazardous waste requirements. The company that transports your waste solvent must have a Missouri hazardous waste transporter license. Other requirements depend on how much waste you generate. In most cases you will need to get a generator identification number from the department and use a manifest when you ship the waste off-site. Be sure you get a copy of the completed manifest.

In some cases you can have a contract with your solvent recycler instead of using a hazardous waste manifest. Small quantity generators of hazardous waste can do this. The agreement with your recycler must include the type of waste and frequency of shipments. The waste must be transported to the recycling facility and the recycled material brought back to you in the recycler's own vehicle.

Remember

- If you recycle your hazardous waste solvent or paint, you need to notify the department. You may need a resource recovery certification.
- If someone else recycles your hazardous waste solvent or paint, that person needs a resource recovery certification from the department.
- Still bottoms and filters from recycling solvent or paint usually are hazardous waste. Store it in closed, labeled containers before disposing of it with a facility legally able to accept hazardous waste.

Solvent Reuse

Many collision repair shops find that one of their biggest expenses is for solvents. Many cleaning solvents and thinners are regulated as hazardous waste. They also may contain chemicals that can cause air pollution. Reusing solvent can help protect the environment and save money.

Reusing Solvent

It can be easy and inexpensive to reuse your solvent. You can use dirty solvent as a first rinse for dirty equipment. Another method is to settle out the solids in your used solvent. Put the used solvent in a container and leave it undisturbed until the solids settle out. Siphon off the liquid solvent with a drum pump. Filtering equipment is also available for used solvent. If you filter your solvent it is considered recycling and other rules may apply.

Your reused solvent may not be suitable to use as a paint thinner, but you can use it for cleaning. If you need to, use a small amount of fresh solvent as a final rinse.

Eventually your solvent may be too dirty to reuse. When this happens, you should recycle it. Recycling, like reuse, saves money and helps protect the environment. Dispose of used solvent only as a last resort.

If you need to recycle or dispose of your used solvent, you must find out if it is hazardous waste and follow the requirements for managing the waste.

Permits for Reusing Solvent

You do not need a permit from the Missouri Department of Natural Resources if you simply allow solids to settle out of your used solvent at your shop. However, if you filter your used solvent or process it in some other way, there may be hazardous waste rules that apply. Also, the material (sludge) that settles out may be hazardous waste.

Storing Used Solvent

If your used solvent is hazardous waste, you must store it according to hazardous waste rules even if you plan to reuse it. Store hazardous waste in a closed container labeled with the words "Hazardous Waste" and the date you first put waste in it. The length of time you can store the waste depends on how much waste you generate.

Managing Sludge

Usually the sludge that settles out of used solvent is hazardous waste because it is ignitable or toxic or because the solvent is a listed hazardous waste.

If the waste has a flash point of less than 140 degrees Fahrenheit, it is ignitable hazardous waste. This means the waste will catch on fire at less than 140 degrees. If it contains toxic materials (usually metals like chromium or lead) over certain levels it is a toxic hazardous waste. If the solvent is on one of the lists from the federal government of materials regulated as hazardous waste, the sludge is a listed hazardous waste. Some of the solvents on this list include trichloroethylene, tetrachloroethylene (perc), methylene chloride, xylene, acetone, methyl ethyl ketone (MEK), toluene and others.

The material safety data sheets for your solvents and paints should indicate the chemicals (such as toluene, etc.), the flash point and any toxic chemicals present in large quantities. You can check with your solvent vendor to find out if the solvent is hazardous waste. If it is, you can assume the sludge is hazardous. If the solvent is not hazardous, the sludge may still be hazardous because of contaminants in it.

If you don't know from your MSDS or some other authority that your sludge is non-hazardous, you will need to have it tested. A laboratory will need to measure the flash point and do a toxicity characteristic leaching procedure.

There are many laboratories that will do these tests. Check your phone book, ask your vendor or contact your trade association for suggestions. The TCLP will only need to test for the chemicals that you expect to find in your waste.

If you know your waste is non-hazardous, either by your own knowledge or by testing, it can go in your regular trash only if it is dry. Liquid nonhazardous waste can be dried out by mixing it with an absorbent like kitty litter. Always check with your local sanitary landfill officials to make sure they will accept this waste.

Remember

- Reduce the amount of solvent you use. Reuse your used solvent if possible. Recycling is the next best option.
- Sludge or filters that come from cleaning up your solvent may be hazardous waste.

Pollution Prevention Options

Preventing pollution instead of treating or disposing of it can save money, protect the environment and reduce risk to people. To prevent pollution, look for ways to reduce the amount of solvent you use and ask your supplier for non-hazardous solvents and paints.

Surface Preparation

Surface preparation involves cleaning, paint removal, filling and sanding of the parts to be refinished. These activities can create hazardous waste, non-hazardous waste, air pollution and water pollution.

Some shops wash wastes from surface preparation down the drain. That is allowable only if the drain leads to a sewer and wastewater treatment plant and you have permission from the wastewater plant. Never send wastewater from your shop operation into a septic system or discharge it directly to the environment unless you have a permit from the Missouri Department of Natural Resources to do so.

Cleaning

Clean surfaces with soap and water before beginning the repair operation. Use cleaners with a low percentage of volatile organic compounds (VOCs) or none at all. VOCs are chemicals that cause air pollution. Use high VOC cleaning products only if absolutely necessary.

Paint Removal

Chemical paint stripping may generate hazardous wastes and may release large amounts of VOCs and other air pollutants in your shop. Ask your supplier for chemicals with the lowest VOC content that will work. Check the material safety data sheet to find the VOC content and to find out if the chemical is a hazardous waste. You may need to check with your supplier or manufacturer.

Some shops wash the paint stripper down the drain. Remember, this is allowed only if the drain leads to a sewer and wastewater treatment plant and you have permission from the wastewater plant. Also, make sure the paint stripper won't melt your drain lines.

There are non-chemical paint removal methods you may want to consider. Plastic bead blasting, high pressure air, cryogenic stripping, carbon dioxide (CO₂) pellets or sponge blasting are technologies being used in some situations to remove paint. The waste from paint removal may be hazardous, whether you use chemicals or non-chemical methods.

Filling

Polyester/fiberglass filler is used to fill in dents that cannot be removed by mechanical methods. Body filler typically is not a hazardous waste, but check your MSDS or ask your vendor to be certain. It may be stored in a clean, dry storage area.

Sanding

Sanding creates dust. Be careful not to let airborne dust from sanding leave your property.

Dust and waste that collects on the shop floor may end up in your floor drain. This can increase sludge volume and disposal costs. Carefully sweeping up dust and dirt will help avoid this problem.

Some shops find it worthwhile to buy a vacuum sanding system. Although the initial cost may seem high, the potential annual cost savings can be nearly equal. Benefits include cost savings due to reduced clean-up labor, reduced sandpaper use and improved shop cleanliness. It can also improve the quality of your paint job.

If your sanding dust includes paint that contains toxic metals like lead, cadmium, barium or chromium, the dust may be hazardous waste. Using paints that don't contain these metals will help you avoid this problem.

Remember

- Don't send wastewater from your shop operation to a septic system.
- Never dispose of any wastes or wastewater onto the ground. Take wastes and wastewater to a facility that is legally allowed to accept it.
- Paints, primers and topcoats may contain toxic materials, such as lead, cadmium and chromium causing them to be a regulated hazardous waste. If you have dust or other wastes that contain some hazardous paint, they may be hazardous waste, too.

Pollution Prevention Options

Preventing pollution instead of treating or disposing of it can save money, protect the environment and reduce risk to people. Here are some suggestions:

- Ask your vendor for non-hazardous paints and paint strippers.
- Keep hazardous wastes separate from all other wastes.
- Don't use more filler than is necessary. Keep track of how much filler each person in your shop uses. The person who uses the least amount per job may be able to train other staff on how to use less filler.

Wastewater

Collision repair businesses generate wastewater during daily operations. Sources of wastewater include water from cleaning cars, parts and shop floors. This wastewater may contain metals that can cause it to be hazardous or it may be a corrosive hazardous waste. It may also contain oils, grease, solvents and detergents.

Most communities provide sewer collection and wastewater treatment facilities. If your business is connected to a sewer and treatment plant, contact them to discuss the materials you wish to dispose of in the sewer system.

You may need to pretreat the wastewater in some way before putting it in the sewer. For example, an oil/water separator or treatment may be required. By pretreating your wastewater, you help assure the community's sewer and treatment system continues working for everyone.

In areas where a wastewater treatment facility is not available or cannot take your water, you must carefully manage the wastewater from your shop. If the wastewater is hazardous, you must manage it by sending it to a permitted hazardous waste facility.

If your wastewater is not hazardous, you can haul it to an approved wastewater treatment plant if the plant agrees. Also, if the wastewater is not hazardous, you may be able to treat it yourself. This will require a permit from the Missouri Department of Natural Resources to assure that the treatment process you want to use will properly treat your wastewater.

If you cannot connect your shop to a wastewater treatment plant, you may be able to discharge domestic wastewater (water from restroom or kitchen facilities) to a septic system. On-site septic systems treating domestic wastewater are regulated by county health departments. You will still need to collect industrial wastewater (water from parts washers, floor cleaning, etc.) and manage it as described above. Do not put your industrial wastewater down the drain unless you are connected to a sewer and treatment plant and have permission from the plant. Management practices that reduce, reuse and recycle the wastewater can greatly reduce your disposal costs. They will also help protect sewer systems and treatment plants.

Remember

- If your shop is connected to a sewer system and treatment plant, contact the treatment plant to find out if you can put your wastewater down the drain. You may need to pretreat your wastewater before it goes to the treatment facility.

If your shop is not connected to a sewer system and treatment plant, you can

- Get a permit from the department to treat the wastewater yourself, or
- Collect the industrial wastewater and determine if it is hazardous waste. If it is hazardous waste, send it to a permitted hazardous waste facility. If it is not, you can haul it to an approved wastewater treatment plant if the plant agrees to accept it.
- Do not send wastewater from your shop (except restroom or kitchen waste) to a septic system.
- Never let untreated wastewater from your shop go outside onto the ground, down a storm drain or into a body of water.

Pollution Prevention Options

Preventing pollution can save money, protect the environment and reduce risk to people. Here are some suggestions:

- Collect and recycle petroleum-based fluids such as used oil, transmission fluid and brake fluid.
- Collect and recycle coolants from radiators.
- Reuse dirty rinse water as makeup water in a hot tank or jet spray washer to pre-rinse parts.
- Use drip pans to catch leaks before they hit the floor.
- Use absorbents to clean up minor fluid leaks and spills.
- Sweep floors before washing them.
- Accumulate all sludges in a closed, marked container. Determine if they are hazardous waste, and store and dispose of properly.

For More Information

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