Self-certification Checklist for Autobody Refinishing Shops

This checklist is a tool to help **autobody refinishing shops that spray apply paints and coatings.** Autobody shops may be affected by the new US Environmental Protection Agency (EPA) rule for Paint Stripping and Miscellaneous Surface Coating Operations, often called the EPA autobody rule (also known as 6H or the federal NESHAP). The goal of the EPA autobody rule is to limit emissions of **six air pollutants**—cadmium, chromium, lead, manganese, nickel, and methylene chloride—that are hazardous to human health.

This checklist will also address some basic rules within your state that regulate air pollution, waste management, wastewater disposal requirements and best management practices for small shops.

Do you know if your shop is affected by the new EPA regulation? Most autobody shops that paint vehicles or components of vehicles are subject to the rule requirements.

- If your shop does **not** spray apply paints or coatings or use any chemical paint strippers, this rule does not apply to your operation. Please contact us so we can correct our records. Contact information for your state's Small Business Environmental Assistance Program is on this sheet.
- If your shop **only** applies coatings with spray guns that have a cup size of 3 ounces or less, the EPA autobody rule may not apply to your painting operations. (Caution: 3 ounces is not very much! It's about half of a small coffee cup.)
- If your shop uses **any** chemical paint strippers that contain methylene chloride as an ingredient, you may be affected by the paint stripping requirements in this rule even if you do not spray paint.

The EPA autobody rule does contain some provisions for exemptions. Shops using **only** coatings that **do not** contain cadmium, chromium, lead, manganese, or nickel are not subject to the spray coating requirements of the rule **if** they have been granted an exemption from the EPA. If you have not received a letter from EPA approving an exemption, your shop is **not exempt**, even if you do not use any coatings containing the hazardous air pollutants. For more information on petitioning for an exemption, go to http://www.epa.gov/collisionrepair/pdfs/petitionforexemption.pdf.

How should you use this packet? The packet is divided into two parts:

- Self-certification checklist
- Notification of Compliance Status form

The self-certification checklist will help you review the rule requirements and your shop operations, and the Notification of Compliance Status form will help you meet the reporting requirements of the EPA autobody rule.

❑ Complete the self-certification checklist first. It will allow you to evaluate your shop operations and determine whether your shop complies with the requirements of the EPA autobody rule. It also will give you the information you'll need for completing the Notification of Compliance Status. **Send the original signed copy of the checklist to Wisconsin's Small Business Environmental Assistance Program before March 11, 2011 (see mailing address below). Make sure to keep a copy for your files.**

For questions:	**Submit final checklist:**
Michigan Department of Natural Resources and Environment (DNRE), Environmental Assistance Program Phone: (800) 662-9278 Email: ostrowskij2@michigan.gov or fiedlerd@michigan.gov	WI SBCAAP - 5th Floor Department of Commerce PO Box 7970 Madison, WI 53707-7970 or online[1] at: http://commerce.wi.gov/bd/BD-CA-AutobodyShopComptraining.html

❑ After you've worked through the checklist, you'll be ready to complete the Notification of Compliance Status form. All autobody shops that are affected by the federal rule are required to submit this form. The form and instructions are included at the end of this booklet. **Send original signed copies of the Notification to EPA, and your state if required, by March 11, 2011 (mailing addresses are listed on the form). Make sure to keep a copy for your files.**

If you have already submitted your Notification of Compliance Status, or if you submitted a Petition for Exemption that was approved by EPA, you should still complete and submit this checklist. It will help you evaluate and determine whether your shop meets all applicable requirements and uses best management practices. Best management practices protect your employees, reduce your risk and liability, and save money by reducing the amount of supplies you need to purchase and the waste you must manage.

[1] If you submit your response to the checklist online, you still must submit the Notification of Compliance Status as indicated on that form.

Checklist Instructions:

This checklist is organized in sections, containing questions on the following areas of your shop's operation:

- EPA Autobody Rule
    - General information
    - Spray guns
    - Spray booths and prep stations
    - Training
    - Paint removal/stripping
    - Documentation, recordkeeping and reporting
- State Rules
    - Air Pollution/VOCs
    - Waste management
    - Wastewater
- Best Management Practices
    - Pollution prevention
    - Energy efficiency

The questions in the checklist are worded so that answering "Yes" means your shop is likely to be in compliance with requirements and answering "No" means you might have a compliance problem that you should investigate further and correct if needed.

At the end of the checklist, we have included a copy of the Notification of Compliance Status form. The deadline for submitting this form is March 11, 2011. If you have not submitted it already, complete this form, make a copy for your records, and send it to EPA, and your state environmental agency, at the address(es) provided on the form. Some states do not require the form be submitted.

If you have any questions about this checklist or the Notification of Compliance Status form, or would like free, confidential compliance assistance, please contact your state's Small Business Environmental Assistance Program at the phone number or email listed on the first page.

Basic Facility Information (Required)

Facility Name	
Facility Address	
Facility County	
Name of Person Completing Form	
Telephone Number of Person Completing Form	
Facility Owner/Manager Name	

General Information	Tips and Help Answering the Questions
1. Which of the following categories best describes your role at this shop? *(mark all that apply)* ___ Owner ___ Manager ___ Technician who applies spray coatings ___ Another role *(specify)*_____	
2. What type of services does your shop provide? *(mark all that apply)* ___ Auto mechanical repair ___ Salvage yard ___ Autobody shop ___ Car dealership ___ Mobile paint service ___ Car wash ___ Other (explain):_____	
3. How many employees and paint technicians (or anyone who may paint) do you have in your shop? ___ # employees (total at shop) ___ # paint technicians	# employees means total for shop, including owner/manager and office staff # paint technicians includes spraying primers Count all employees, including part-time workers.
4. Does your shop use – *check one in each row*: **Water-based paints:** ___ Only ___ Some ___ None **Water-based primers:** ___ Only ___ Some ___ None **Water-based cleaning solvents:** ___ Only ___ Some ___ None	Water-based products are often described as those with VOC (volatile organic compounds) content of less than 2 lb VOC/gal. To determine the VOC content of your paints, primers, and solvents, check the MSDS. The section on physical properties (frequently Section 9) will often list the VOC. You can also ask your supplier if your coatings are considered water-based.

General Information	Tips and Help Answering the Questions
5. Do any of the primers, base coats, clear coats, or other coatings used at your shop contain any of these ingredients or compounds including at least one of these? *Note that there are specific target concentrations for each ingredient or compound, which are listed in parentheses. Check all that apply*: ___ **Cadmium** (greater than 0.1% by weight) ___ **Chromium** (greater than 0.1%) ___ **Lead** (greater than 0.1%) ___ **Manganese** (greater than 1%) ___ **Nickel** (greater than 0.1%) ___ ***None* of the paints and coatings used at my shop contain *any* of the above ingredients.** ___ **I do not know if my paints contain these ingredients, but will assume they do and comply with the rule.** **NOTE: If you can answer "None" above, then you may be eligible to petition EPA for an exemption to the spray painting portion of the EPA autobody rule (6H or the NESHAP). If you submit a petition for exemption, you MUST receive an approval letter from EPA to avoid having to comply with the requirements that follow in this checklist.** **Comply with the requirements of the rule, including the submittal of the Notification of Compliance Status form to EPA if you have not received an approved petition prior to March 11, 2011.**	These five metals—cadmium, chromium, lead, manganese and nickel—have been identified as Hazardous Air Pollutants, and a goal of the EPA autobody rule is to reduce emissions of these compounds. Compounds with at least one ingredient can include Lead Chromate, Nickel Chromate, or similar mixtures. Typical uses in autobody paints and coatings: • Lead and/or chromate are often found in red, orange, and yellow pigments. • Cadmium is often found in blue and green pigments. • Primer can contain chromium or lead for corrosion resistance. You can refer to lists prepared by the major paint manufacturers that list their product codes for those paints and coatings that include at least one of these regulated materials on this web page: http://www.smallbiz-enviroweb.org/Compliance/NewRules/PaintStripping.aspx Click on "Paint Manufacturing/Petition for Exemption Resources" and then select the links for the appropriate manufacturer of the paint lines you use. Keep a current file of MSDSs for all the coatings and cleaning solvents used at your shop available on-site.

General Information	Tips and Help Answering the Questions
6. Are you aware of your state's Small Business Environmental Assistance Program and its free, confidential, non-regulatory compliance assistance services? ____ Yes ____ No ____ Don't know ____ I would like more information on how to obtain free, non-regulatory compliance help – please contact me.	The contact information for your state's SBEAP office is on the first page of this checklist.
7A. How do you prefer to receive regulatory information? *(check all that apply)* ___ Mailing/written materials ___ Videos – training or "fact sheets" ___ E-mail messages/documents ___ Web training ___ Web site ___ Facebook/twitter/YouTube ___ On site visit ___ Training sessions/workshops offered by suppliers ___ Training sessions/workshops offered by state assistance program ___ Other (specify:_____) **7B.** When do you prefer workshops to be held? ____ During the day ____ After work hours	

EPA Rule - Spray Guns	Tips and Help Answering the Questions
This question applies to all spray guns used in your shop, including those that technicians own and use on site. **8A. Are ALL spray guns at your shop HVLP, HVLP-equivalent, electrostatic, airless, or air- assisted airless?** ___ Yes ___ No **8B. If you answered YES, identify which gun(s) are used (check all that apply):** ___ HVLP ___ HVLP equivalent ___ Electrostatic ___ Airless ___ Air-assisted airless	The EPA autobody rule requires that only the spray gun types listed in 8A are used after January 10, 2011. "HVLP" is often stamped on the gun handle or cap. If not, contact your spray gun supplier to verify that the make/model is HVLP or HVLP equivalent, or look at purchase records or manuals. HVLP-equivalent means that you have documentation from the gun manufacturer or supplier that it has been approved by EPA. It is strongly recommended that you remove all non-compliant guns from your shop. Conventional guns are not compliant. For a list of HVLP approved or equivalent guns, go to one of these documents: HVLP: http://commerce.wi.gov/bd/docs/BD-R5ERP-HVLPgunlist.doc Equivalent: http://commerce.wi.gov/bd/docs/BD-R5ERP-HVLP-equivalentgunlist.doc
9A. Is all paint spray gun cleaning done with a fully enclosed spray gun washer or in a way that does not create a mist of solvent? ___ Yes ___ No **9B. If you answered YES, identify which method(s) are used:** ___ Fully enclosed spray gun washer ___ Fully enclosed spray gun washer and occasionally disassemble and clean by hand ___ Flush with solvent (but don't spray) ___ Disassemble gun and clean by hand or mechanical methods	The EPA autobody rule requires that only the gun cleaning methods listed in 9A are used after January 10, 2011. If the gun is connected to the air compressor during cleaning and you spray solvent through the gun, it will create a mist, which is not compliant with the rule. Pouring solvent through the gun and letting it run out directly into a waste container would not create a mist, and would be acceptable under the rule.

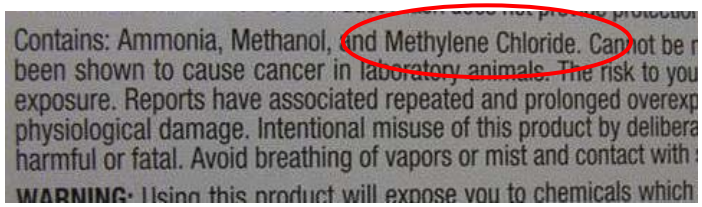
EPA Rule - Spray Booths and Prep Stations	Tips and Help Answering the Questions
10. Does ALL spray coating (including priming) occur in a spray booth or prep station – never out on the shop floor or outdoors? ___ Yes ___ No	The EPA autobody rule requires that all spray coating be done within a booth, as outlined in the following questions, after January 10, 2011.
11A. When applying a coating to a whole vehicle, or to a component that is still attached to the vehicle, does it ALWAYS occur in a spray booth or prep station that has 4 walls/curtains and a roof? ___ Yes ___ No **11B. How many spray booths or prep stations with 4 walls/curtains and a roof do you have? _____**	The EPA autobody rule requires that when all or part of a vehicle is being painted, it must be contained within a four-wall booth after January 10, 2011. To meet the enclosure requirements, side curtains may be used in place of walls. Side curtains are typically installed on tracks, so they can be easily opened and closed. Side curtains need to extend from the floor to the roof without any gaps.
12A. When applying a coating to a component that IS removed from the vehicle, does it ALWAYS occur in a spray booth or prep station that has <u>at least</u> 3 walls/curtains and a roof? ___ Yes ___ No **12B. How many spray booths or prep stations with only 3 walls/curtains and a roof do you have? _____**	The EPA autobody rule requires that when a part is removed from vehicle to be painted, it must be painted in a booth with at least three walls after January 10, 2011. To meet the enclosure requirements, side curtains may be used in place of walls. Side curtains are typically installed on tracks, so they can be easily opened and closed. Side curtains need to extend from the floor to the roof without any gaps.
13. Are ALL spray booths and prep stations ventilated with an exhaust fan? ___ Yes ___ No	The EPA autobody rule requires that the above-mentioned booths have an exhaust that pulls air out of the booth after January 10, 2011.

EPA Rule - Spray Booths and Prep Stations	Tips and Help Answering the Questions
14. Is each spray booth and prep station that has 4 walls • **ventilated at negative pressure, OR** • **ventilated at positive pressure with seals on all doors and openings, and an automatic pressure balancing system, and operated at no more than 0.05 inches water gauge positive pressure?** ___ Yes ___ No	The EPA autobody rule requires that all four-wall booths be ventilated as indicated in #14 after January 10, 2011. Negative pressure means that air is drawn into the spray booth or prep station. Maintaining negative pressure requires: sufficient make-up air, proper filtration, and venting.
15. Is each spray booth and prep station that has 3 walls ventilated so that air is drawn into the booth? ___ Yes ___ No ___ Not Applicable – we do not have any spray booths or prep stations with only 3 walls – they all have 4 walls	The EPA autobody rule requires that all three-wall booths be ventilated as indicated in #15 after January 10, 2011.
16. Do ALL spray booth and prep station exhaust systems have an overspray filter system? ___ Yes ___ No	The EPA autobody rule requires that all booths be exhausted through either a dry filter system or waterwash booth after January 10, 2011.
17. Are spray booth and prep station exhaust/filter systems ALWAYS used when any spray painting (including priming) is done? ___ Yes ___ No	

EPA Rule - Spray Booths and Prep Stations	Tips and Help Answering the Questions
18. Is the filter capture efficiency rating of ALL dry filter systems at least 98 percent? ___ Yes ___ No ___ Not applicable – we have a waterwash booth	Filter efficiency information would typically be found on the filter package or provided by the distributor. If you don't purchase filters directly, but go through a subcontractor instead, you may need to get in touch with them to get the info. The filter documentation provided on the package, or by your distributor or subcontractor, should identify that the filter has been tested consistent with ASHRAE method 52.1. If you don't know the filter efficiency or that ASHRAE method 52.1 was used to measure it, you must assume the answer to this question is "No".
19A. Do you have a procedure to determine when exhaust/filter systems need to be cleaned and maintained? ___ Yes ___ No **19B. If you answered YES, how do you decide to when to change a filter?** ___ set schedule (for example, same time each month) ___ pressure gauge reading ___ visual check of filter ___ other - please specify: _____ _____ _____	There should always be good air flow within the spray booth/prep station so the exhaust/filter system captures all the paint spray, AND there should never be any paint staining outside the fan. A pressure gauge such as a manometer or magnehelic can be used to measure the pressure difference before and after the exhaust filters. As the filter collects more paint solids, this pressure difference increases. Different styles and brands of paint filters will reach their "change out" reading at varying rates depending on paint types, booth design, operator technique, fan speed, temperature, etc.

EPA Rule - Training	Tips and Help Answering the Questions
20A. Have ALL your paint technicians attended a training specifically designed to cover the requirements of the new EPA auto body rule (known as 6H or the NESHAP)? ___ Yes ___ No **20B. If you answered YES, did the training contain both hands-on and classroom sessions?** ___ Yes ___ No	The EPA autobody rule requires that all painters receive training as described in the rule prior to January 10, 2011, **and** receive refresher training every five years after the initial training is complete. Many suppliers provide this training. Contact your supplier to see if they are offering trainings that meet this requirement. Technical Colleges may have added the EPA Rule training requirements to their curriculum in the past year or two, but do NOT assume recent graduates from a technical college have received the proper training. Review transcripts or obtain class descriptions for the year(s) the employee attended. The intent of the training requirements is to improve each painter's ability to apply coatings in a more efficient manner. Just having a painter hold a spray gun in their hands at the training will not achieve this goal. The hands-on portion of the training should include: • Spray gun selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate. • Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including, maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.

EPA Rule - Training	Tips and Help Answering the Questions
21. Did the training cover ALL of the following specific topics? ___ Yes ___ No ➔Spray Gun Selection and Set Up - including a hands-on component: • measuring viscosity • selecting proper fluid nozzle or tip • achieving proper spray pattern • air pressure and volume • fluid delivery rate ➔Spray Gun Use – including a hands-on component – on spray technique to improve transfer efficiency and minimize coating usage and overspray, including: • maintaining the correct spray gun distance and angle to the part • using proper banding and overlap • reducing lead and lag spraying at the beginning and end of each stroke ➔Spray Gun Maintenance – including an hands-on component: cleaning method must eliminate creating any solvent mist ➔Spray Booth and Filter Maintenance - including filter selection and installation ➔Description of requirements in the EPA autobody rule	To answer YES, the training MUST have covered ALL these elements. If any ONE is missing, it is not complete and should be supplemented to be sure it can be certified as complete.
22. Is the training for ALL technicians up-to-date? ___ Yes ___ No	All new technicians must be trained within 180 days of hire and current technicians must be trained by January 10, 2011 – the compliance deadline listed in the rule. Existing technicians may use experience or previous training that meets the training criteria listed, but that must be documented and the owner must certify that the training was sufficient to meet the rule. All training received is only good for 5 years and a refresher course must be taken prior to the 5 year anniversary.

EPA Rule - Paint Removal/Stripping	Tips and Help Answering the Questions
23. Is your shop exempt from the methylene chloride paint stripping requirements in the EPA autobody rule? ___ This shop is ***exempt*** because: • we do not use any chemical strippers (only mechanical methods like sanding), or • we have verified that the chemical strippers used in the shop do not contain Methylene Chloride. **If exempt, skip to Question 28.** ___ This shop is ***not exempt*** because we use a chemical stripper that contains Methylene Chloride. **If not exempt, answer Questions 24-27.**	The EPA autobody rule requires that use of methylene chloride to be minimized as much as possible after January 10, 2011. It is strongly recommended that you remove all chemicals containing methylene chloride from your shop, especially if you do not absolutely need them – they are a hazardous waste and must be disposed properly. Methylene Chloride is also known as di-chloromethane (DCM) or methylene dichloride (identified by CAS no. 75-09-2). Check the container label or the MSDS to verify whether any chemical paint strippers in your shop contain this compound. Some likely brands include: StripRDry, Booth Floor Stripper (both made by CMA Philadelphia); Airplane stripper.
24. Do you have records documenting the amount of paint stripping products containing Methylene Chloride your shop uses each year? ___ Yes ___ No **25. How much product containing Methylene Chloride does your shop use each year?** _____ gallons per year **26. Does your shop have a plan to reduce or eliminate the use of Methylene Chloride?** ___ Yes ___ No **27. If your shop uses 2,000 pounds (~150 gallons) or more in a year, is your plan written and is it posted in the same location where the Methylene Chloride is used?** ___ Yes ___ No ___ Not applicable – we use less than 2,000 pounds per yr	 Contains: Ammonia, Methanol, and Methylene Chloride. Cannot be been shown to cause cancer in laboratory animals. The risk to you exposure. Reports have associated repeated and prolonged overexp physiological damage. Intentional misuse of this product by delibera harmful or fatal. Avoid breathing of vapors or mist and contact with WARNING: Using this product will expose you to chemicals which Methylene chloride may be abbreviated MeCl on labels or MSDS for products. Plan must: • Evaluate need to remove paint • Evaluate each application for alternatives: (non- or low-; blasting; mechanical; thermo) • Reduce MeCl stripper exposure to air • Minimize evaporation during use • Ensure proper storage and disposal techniques

EPA Rule - Documentation, Recordkeeping and Reporting	Tips and Help Answering the Questions
28A. Have you submitted an Initial Notification for the EPA autobody rule as required? ___ Yes ___ No **28B. If you answered YES, do you have a copy in your files and available for review?** ___ Yes ___ No	The Initial Notification was due on January 10, 2010. If you missed this deadline, you should send it in as soon as possible. You can find a form here: MI form: Go to www.michigan.gov/air (select "clean air assistnace" then click on "Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources" under "Federal Regulations") or call (800) 662-9278.
29. Do you have in your files and available for review the required documentation of the efficiency of the filters used to capture paint overspray? ___ Yes ___ No ___ Not applicable – we have a waterwash booth	Filter efficiency information would typically be found on the filter package or provided by the distributor. If you don't purchase filters directly, but go through a subcontractor instead, you may need to get in touch with them to get the documents. The filter documentation provided on the package, or by your distributor (or subcontractor) should identify that the filter has been tested consistent with ASHRAE method 52.1.
30A. Do you have records on the training each technician received in your files and available for review? ___ Yes ___ No **30B. If you answered YES to 30A, has the shop owner and/or operator certified that the training each technician took meets the requirements of the EPA autobody rule?** ___ Yes ___ No **30C. If you answered YES to 30A, has the training for each technician occurred within the past 5 years?** ___ Yes ___ No	Records on file for each technician should include: • name of technician, • certificate of training completion, • date(s) of training, • location of training, • training agenda. The owner and/or operator of the shop must certify that the training met the requirements of the EPA autobody rule (also known as 6H or the NESHAP), and this signed certification should also be kept in the file.

EPA Rule - Documentation, Recordkeeping and Reporting	Tips and Help Answering the Questions
31A. Do you have verification that all your spray guns are HVLP, HVLP-equivalent, electrostatic, airless, or air-assisted airless? ___ Yes ___ No **31B. If YES, please describe the documentation available on the spray guns:** ___ "HVLP" is stamped on every gun ___ documentation for every gun in my shop is in my files and available for review ___ "HVLP" is stamped on some guns and documentation is in my files for all the others	Documentation could include that "HVLP" is stamped on the gun, or you can use purchase records or manuals. If you don't have documentation for every gun, contact your spray gun supplier to get it. Note that HVLP-equivalent means that you have documentation from the gun manufacturer or supplier that it has been approved by USEPA. It is strongly recommended that you remove all non-compliant guns from your shop. Conventional guns are not compliant.
Congratulations on completing these initial sections of the self-certification checklist. You now have compiled the information needed to determine whether your shop meets the requirements of the EPA autobody rule. **If you answered "Yes" to all the "Yes / No" questions above, your shop is in compliance with rule requirements. Submit your Notification of Compliance Status by March 11, 2011 to EPA and your state as indicated on the form. Make sure to keep a copy for your files!** **If you answered "No" to any "Yes / No" questions above, make any needed changes by January 10, 2011, and then submit the Notification of Compliance Status before the deadline.** **Continue on to the next sections of the checklist to complete your evaluation of your shop operations.**	Your shop must be in compliance with all the requirements of the rule by January 11, 2011. Submit the Notification of Compliance Status by March 11, 2011. The Notification of Compliance Status form, along with instructions, is included at the end of this checklist. The form is also available online at http://commerce.wi.gov/bd/BD-CA-AutobodyShopComptraining.html If you are uncertain about what changes you need to make, or whether you are currently in compliance with any part of this regulation, please contact your local Small Business Environmental Assistance Program for help. Contact information is listed on the first page of this packet.

State Rule - Waste Management	Instructions and Tips
The questions contained in this section are not exhaustive. They are meant to provide you with a basic understanding of hazardous waste requirements and whether your shop is in compliance. It is best to contact your SBEAP to obtain assistance on whether the hazardous waste generated at your shop is being handled properly.	
WM 1: Have you looked at all of the wastes your shop generates and determined which ones are considered hazardous wastes? ___ Yes ___ No	**Paint and solvent wastes are likely to be hazardous wastes. If you have not sent your paint and solvent waste to have it tested, you must assume it is a hazardous waste.** Without actual test results, it is best to assume that all rags, filters, etc. in contact with hazardous materials are also hazardous, and should be counted towards your total waste generation (see next question). **You are required to have records showing how you classified your wastes (i.e., hazardous or non-hazardous solid waste, or other terms used in your state). Your records must include a description of how you made your waste determination (MSDS, test results, process knowledge, etc.) and copies of documents should be kept in one file so it is easily available!** Example waste inventory sheets or waste characterization guidance can be found here: http://commerce.wi.gov/bd/BD-CA-AutobodyShopComptraining.html
WM 2A: Do you record the amount of hazardous waste that your business generates? ___ Yes ___ No **WM 2B: What is the highest amount your shop generates in a month?** _____ Is the amount in pounds or gallons? ___ pounds ___ gallons	Document each waste stream and the weight of material generated (not shipped) per month for each waste stream, add it all up, and compare it to the 220 pound limit. Do not include liquid industrial waste, used oil, or hazardous waste managed as a universal waste. Wastes that may be managed as a universal (or simply non-hazardous) waste in some states include batteries, fluorescent lights, antifreeze, mercury containing switches, and consumer electronics. In addition to waste paint and solvent, you should also include paint filters, still bottoms, and disposable rags, unless you have documentation that confirms they are not hazardous waste. Maintaining a running log of the amount of waste in a waste container at the beginning of each month an easy way to inventory the volume of waste generated. *RULES OF THUMB FOR WASTE MEASUREMENTS:* *1 pint = 1 pound* *1 gallon = 8 pounds (or 10 pounds in MN)* *14 gallons or one quarter of a 55-gallon drum = 110 pounds* *One 55-gallon drum = 440 pounds*

State Rule - Waste Management	Instructions and Tips
WM 3: Does your shop generate NO MORE than 220 pounds (26 gallons) of hazardous waste in its busiest month? ___ Yes – never more than 220 pounds a month ___ No **If NO,** your shop must comply with additional requirements that are not included in this checklist. Skip questions WM4-WM7 and refer to your state waste rules for hazardous waste requirements or other guidance provided here: http://commerce.wi.gov/bd/BD-CA-AutobodyShopComptraining.html	If your shop generates MORE than 220 pounds of hazardous waste in a month the shop is a: *Small Quantity Generator (SQG)* = ***27-270 gal/mo; >220 – 2200 lb/mo*** *Large Quantity Generator (LQG)* = ***>270 gal/mo; >2200 lb/mo*** SQGs and LQGs have more regulatory requirements than this checklist covers. Refer to your state SBEAP for more information.
Questions WM4, WM5, WM6 and WM7 only apply if your shop generates LESS than 220 pounds (about 26 gallons) of hazardous waste in a month. If your shop generates more, you have additional requirements!	

State Rule - Waste Management	Instructions and Tips
WM 4: Are ALL your hazardous wastes stored correctly as outlined below? ___ Yes ___ No To answer YES, you must be able to check off ALL actions required: ___All hazardous waste is stored in containers or tanks that are in good condition (i.e., free of severe rusting or apparent structural defects, and not leaking) ___ All hazardous waste is stored in a specified location that has a floor resistant to the waste and is protected from the weather ___ My shop NEVER stores 2200 pounds or more of hazardous waste at one time (approximately five 55 gallon drums) ___ All hazardous waste containers are kept closed unless waste is being added or removed ___ There is sufficient aisle space for a person to walk between containers ___ Incompatible materials [e.g., putting rags/towels into waste paint/solvent drums] are kept in separate containers and stored with space between them	"Closed" means that if the containers were tipped, nothing would spill. Funnels are acceptable if they are closed and latched. **If your shop EVER stores 2,200 pounds or more of hazardous waste at any time, your shop is a *Small Quantity Generator* and subject to more regulation than is covered in this checklist. Call your state Small Business Environmental Assistance Program for more information (800) 662-9278.**
WM 5: Are ALL your hazardous waste containers properly labeled as outlined below? ___ Yes ___ No To answer YES, you must be able to check off ALL actions required: ___ All hazardous waste containers are properly labeled with the words "hazardous waste" ___ All drums are labeled with a clear description of the waste inside ___ All drums are clearly marked with the date that waste was first put in the container ___ All containers have a running log of the amount in the drum a the beginning of each month	Example label: Hazardous Waste Name of Waste _____ Hazard _____

State Rule - Waste Management	Instructions and Tips
WM 6: Are you following the proper disposal methods for each of the wastes you generate? ___ Yes ___ No To answer YES, you must be**:** ___ Disposing of your hazardous waste that is **solid** at an authorized 1) non-hazardous solid waste disposal facility (dumpster) or 2) hazardous waste disposal facility ___ Recycling or disposing of your hazardous waste that is **liquid** at an authorized 1) liquid industrial waste designated facility or 2) hazardous waste disposal facility ___ Shipping universal waste for recycling or disposal to 1) an authorized hazardous waste disposal facility or 2) a universal waste handler after making prior arrangement for acceptance	To locate authorized disposal facilities, go to www.michigan.gov/dnrewaste: • Refer to the directory of hazardous waste disposal facilities • Query the Waste Data System (WDS) for facilities accepting CESQG hazardous waste • Query the WDS for universal waste handlers • Review the Recycled Materials Market Directory for recyclers • Refer to the map of non-hazardous solid waste disposal facilities • Call the DNRE for assistance (800) 662-9278 Liquid industrial waste and hazardous waste can only be offered to a transporter permitted and registered to transport the waste using a Uniform Manifest. To locate an authorized transporter, refer to the Participating Transporters list for the type of waste you are offering for transport at www.michigan.gov/dnrewaste (click on "Hazardous & Liquid Industrial Waste Transporters"). To evaluate the compliance status of a vendor, • Query the Waste Data System to for facilities in Michigan • Query the U.S. EPA Enforcement & Compliance History On-line (ECHO) System for facilities outside of Michigan. This information can also be found at the web page http://commerce.wi.gov/bd/BD-CA-AutobodyShopComptraining.html under your specific state.
WM 7: Do you have an employee training program that goes over proper hazardous waste management procedures? ___ Yes ___ No	Training should include: • responding to emergencies • handling empty containers and leaks • proper labeling of containers • handling, collecting, segregating, accumulation

State Rule - Wastewater	Instructions and Tips
The questions contained in this section are not exhaustive and are meant to provide you with a basic understanding of wastewater requirements and whether your shop is likely to be in compliance. They assume the wastewater is not considered hazardous, which should be handled properly under the hazardous waste rules as described above. It is best to contact your SBEAP to obtain assistance on whether the wastewater generated at your shop is being handled properly.	
WW 1: Do you operate a 'dry' shop? ___ Yes – **Skip remaining WW questions**. ___ No – **Answer the remaining questions in the wastewater section**.	**A dry shop is one where no water is used to rinse cars, parts, equipment, floors, or booths. Only rags/wipes (damp or dry), compressed air, brooms or similar techniques are used to clean vehicles and the shop.**
WW2: In most cases, the only allowed ways to dispose of waste liquids from an autobody refinishing and repair shop is to send it to the local sewer, or to a holding tank that is later pumped and delivered to a local treatment plant. Directing those liquids to a storm drain, onto the ground, into a ditch, into septic systems or into unknown outlets are generally not allowed, or if they are it is only allowed by special permit from the state. **Are you following only allowed discharge practices for your shop waste liquids?** ___ Yes ___ No **WW2A: Which of your waste liquids are discharged to storm drain, onto the ground or into a ditch? Check all that apply.** ___ solvents ___ oil/grease ___ car wash ___ antifreeze ___ other: _____ ___ None	Discharging wastewater from facility operations to a ditch, ground, septic system, or storm sewer may be illegal or require a permit or authorization. You must know where all drains discharge. If you do not know for sure, you must assume that you have open floor drains when answering this question. Open floor drains with unknown outlets should not be allowed to empty out into storm drains, a septic system, or onto the ground. Check with your local municipality to find contact information for the local wastewater treatment plant or sewer authority in your area. Some state information may be listed here: http://commerce.wi.gov/bd/BD-CA-AutobodyShopComptraining.html

State Rule - Wastewater	Instructions and Tips
WW2B: Which of your waste liquids are discharged to septic system? Check all that apply. ___ solvents ___ oil/grease ___ car wash ___ antifreeze ___ other: _____ ___ None **WW2C: Which of your waste liquids are discharged to an unknown outlet? Check all that apply.** ___ solvents ___ oil/grease ___ car wash ___ antifreeze ___ other: _____ ___ None **WW2D: Which of your waste liquids are discharged to sewer (local wastewater treatment plant) or a holding tank whose contents are to be transferred to the treatment plant? Check all that apply.** ___ solvents ___ oil/grease ___ car wash ___ antifreeze ___ other: _____ ___ None	
WW 3. If you checked anything besides "NONE" in WW 2A, B or C above, has your shop contacted the state environmental agency to determine if a permit or other authorization is required for any of those activities? ___ Yes ___ No	Contact the Michigan Department of Natural Resources and Environment at (800) 662-9278.

Best Management Practices in Pollution Prevention and Energy Efficiency

These practices are all voluntary. This checklist will help you evaluate your shop's progress toward pollution prevention, and will help us understand which practices are most widely used by auto body shops in the state.

Pollution Prevention Practices	Instructions and Tips
PP 1: Please check any of the following actions you have taken to reduce air emissions: **a. Air Toxics** ___ Keep ALL solvent containers closed to limit evaporation ___ Avoid use of coatings that contain toxic metals (chromium, lead, cadmium, nickel, and manganese) by asking suppliers for alternative formulations? ___ Use Paintless dent repair techniques ___ Avoid use of methylene-chloride based paint strippers ___ Automatic enclosed gun washer ___ Use water-based or low-solvent coatings (primers, basecoats and painting) ___ Use low-VOC solvents or thinners ___ Two-stage solvent use (Wash first with used solvent, then wash with clean solvent. When first wash solvent no longer cleans, replace with second wash solvent, replace second wash solvent with fresh solvent, recycle first wash waste solvent.) ___ Recycle solvents with on-site (or off-site) distiller ___ Have an inventory system (first-in, first-out) in place to prevent products from going out of date? ___ Use computerized paint mixing system to minimize mistakes/over-mixing ___ Use non-solvent based putty/fillers ___ Other (specify) **b. Dust/Particulate matter** ___ Use a disposable paint cup system to minimize unused paint and emissions ___ Use a ventilated sander or self-contained media plaster to minimize emissions from preparing parts ___ Reusable aerosol or pump spray containers ___ Use Roll-on Primer ___ Other (specify)	

Energy Efficiency Practices	Instructions and Tips
EE 1: Please check any of the following actions you have taken to minimize energy use in your shop: **a. Paint booth area:** ___ Paint booth energized only when necessary ___ Booth lights kept clean ___ Filters changed regularly to ensure good airflow (which reduces draw on HVAC motors) ___ Paint booth fan motors have variable speed drives ___ Booth uses heated air recirculation ___ Energy efficient equipment (motors, fans, lighting, spray guns) purchased new or for replacement ___ Booth lighting on timers/motion sensors to reduce energy use ___ Other (specify) **b. Shop areas:** ___ Installed specialized controls (timers, motion sensors) that turn off or throttle back lights, heat, or equipment when areas are not occupied and/or in use ___ Install programmable thermostat for heating/cooling ___ Installed efficient fluorescent lights (<T-12) ___ Encouraged employees to turn off lights ___ Cleaned light fixture reflectors to increase available light ___ Reduced lighting intensity where acceptable ___ Taken advantage of day-lighting ___ Install dusk to dawn lighting fixtures/equipment ___ Completed an energy audit/aware of monthly electricity/fuel use ___ Insulated building, windows and hot/cold ducts or pipes ___ Regularly check your air compressor system for leaks and repair all leaks found. ___ Regularly check your air compressor to ensure that the pressure setting isn't higher than it needs to be. ___ Use electric tools like shop-vacs or blow dryers instead of the compressed air system? ___ Energy efficient office products/machines (computers, copiers, etc.); reduce number of machines in use ___ High efficiency furnace; In floor heating ___ Other (specify):	Air compressor tips: - Walk along compressor pipes/hoses right after turning off the compressor, and listen for hissing. Keep a record of whether the compressor cycles on and off frequently when not in use. A ¼-inch leak can cost you $2,800 per year. - Think about whether the air compressor is properly sized for your foreseeable future needs. Every 2 PSI reduced can save you 1% in electricity usage and cost.) - Turbines for HVLP or small electric tools for specific purposes like buffing or sanding may be preferred to pneumatic

Congratulations! You have reached the end of the self-certification checklist and have completed your review of your autobody shop operations. If you answered "Yes" to all the "Yes / No" questions in the checklist, your shop is complying with the applicable federal and state requirements. If you answered "No" to any "Yes / No" questions above, you may need to make some changes to comply with the requirements.

Submit the completed checklist to the WI SBCAAP listed on the front page of this checklist, keep a copy for your files, and take the actions needed to bring your shop into compliance. For help with questions about complying with the regulations, contact your state Small Business Environmental Assistance Program as indicated on the front page.