"Avoiding Not Ignoring Hazardous Waste Regulations"

"CONNECTICUT AUTO RECYCLERS (CAR) CASE STUDY"

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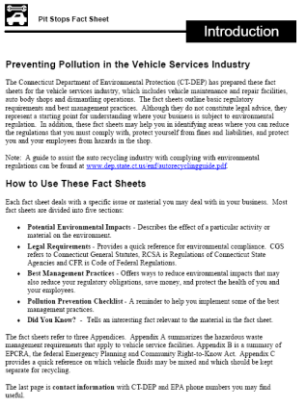
METHODOLOGY

1. Establish Goals
2. Define Waste Streams
3. Identify Applicable Regulations
4. Build On Existing Programs
5. Develop Standard Practices
6. Simple Implementation (plan, do, check, act)
7. Detail User Benefits
8. Assure Economic Viability



Pit Stops Fact Sheet

Introduction

Preventing Pollution in the Vehicle Services Industry

The Connecticut Department of Environmental Protection (CT-DEP) has prepared these fact sheets for the vehicle services industry, which includes vehicle maintenance and repair facilities, auto body shops and dismantling operations. The fact sheets outline basic regulatory requirements and best management practices. Although they do not constitute legal advice, they represent a starting point for understanding where your business is subject to environmental regulation. In addition, these fact sheets may help you in identifying areas where you can reduce the regulations that you must comply with, protect yourself from fines and liabilities, and protect you and your employees from hazards in the shop.

Note: A guide to assist the auto recycling industry with complying with environmental regulations can be found at www.dep.state.ct.us/wtr/autorecyclingguide.pdf

How to Use These Fact Sheets

Each fact sheet deals with a specific issue or material you may deal with in your business. Most fact sheets are divided into five sections:

- **Potential Environmental Impacts** - Describes the effect of a particular activity or material on the environment.
- **Legal Requirements** - Provides a quick reference for environmental compliance. CGS refers to Connecticut General Statutes, RCSA is Regulations of Connecticut State Agencies and CFR is Code of Federal Regulations.
- **Best Management Practices** - Offers ways to reduce environmental impacts that may also reduce your regulatory obligations, save money, and protect the health of you and your employees.
- **Pollution Prevention Checklist** - A reminder to help you implement some of the best management practices.
- **Did You Know?** - Tells an interesting fact relevant to the material in the fact sheet.

The fact sheets refer to three Appendices. Appendix A summarizes the hazardous waste management requirements that apply to vehicle service facilities. Appendix B is a summary of EPCRA, the federal Emergency Planning and Community Right-to-Know Act. Appendix C provides a quick reference on which vehicle fluids may be mixed and which should be kept separate for recycling.

The last page is **contact information** with CT-DEP and EPA phone numbers you may find useful.

Question:

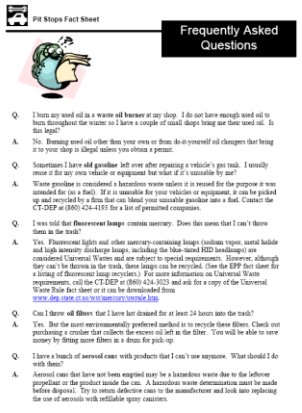
How this is applicable to other Industries?

PROGRAM GOALS

1. Operate RCRA CESQG ⇨ HOW?
   - ➢ Material Segregation
   - ➢ Material Substitution
   - ➢ Used Oil (Proper Management)
   - ➢ Universal Waste
   - ➢ Commercial Chemical Products
2. Maintain Regulatory Compliance

Exemptions⇨Avoid Not Ignore Regulations

3. Develop Standard Template
4. Share Costs, Ideas & Lessons Learned



Pit Stops Fact Sheet

Frequently Asked Questions

Q: I burn my used oil in a waste **oil burner** at my shop. I do not have enough used oil to burn throughout the winter so I have a couple of small shops bring me their used oil. Is this legal?

A. No. Burning used oil other than your own or from do-it-yourself oil changers that bring it to your shop is illegal unless you obtain a permit.

Q. Sometimes I have **old gasoline** left over after repairing a vehicle's gas tank. I usually reuse it for my own vehicle or equipment but what if it's unusable by me?

A. Waste gasoline is considered a hazardous waste unless it is reused for the purpose it was intended for (as a fuel). If it is unusable for your vehicles or equipment, it can be picked up and recycled by a firm that can blend your unusable gasoline into a fuel. Contact the CT-DEP at (860) 424-4195 for a list of permitted companies.

Q. I was told that **fluorescent lamps** contain mercury. Does this mean that I can't throw them in the trash?

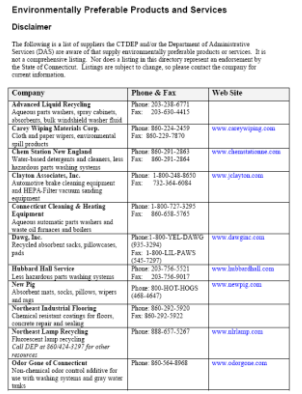
A. Yes. Fluorescent lights and other mercury-containing lamps (sodium vapor, metal halide and high intensity discharge lamps, including the blue-tinted HID headlamps) are considered Universal Wastes and are subject to special requirements. However, although they can't be thrown in the trash, these lamps can be recycled. (See the EPP fact sheet for a listing of fluorescent lamp recyclers.) For more information on Universal Waste requirements, call the CT-DEP at (860) 424-3023 and ask for a copy of the Universal Waste Rule fact sheet or it can be downloaded from www.dep.state.ct.us/wst/mercury/mrmle.htm

Q. Can I throw out **oil filters** that I have hot drained for at least 24 hours into the trash?

A. Yes. But the most environmentally preferred method is to recycle these filters. Check out purchasing a crusher that collects the excess oil left in the filter. You will be able to save money by fitting more filters in a drum for pick-up.

Q. I have a bunch of **aerosol cans** with products that I can't use anymore. What should I do with them?

A. Aerosol cans that have not been emptied may be a hazardous waste due to the leftover propellant or the product inside the can. A hazardous waste determination must be made before disposal. Try to return defective cans to the manufacturer and look into replacing the use of aerosols with refillable spray canisters.



Environmentally Preferable Products and Services

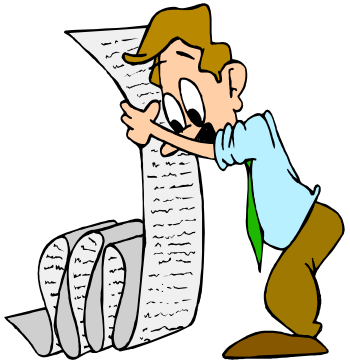
Disclaimer

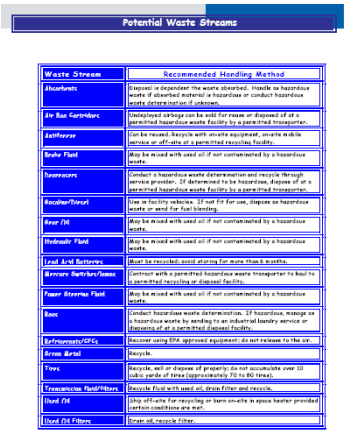
The following is a list of suppliers the CTDEP and/or the Department of Administrative Services (DAS) are aware of that supply environmentally preferable products or services. It is not a comprehensive listing. Nor does a listing in this directory represent an endorsement by the State of Connecticut. Listings are subject to change, so please contact the company for current information.

Company	Phone & Fax	Web Site
Advanced Liquid Recycling Aqueous parts washers, spray cabinets, absorbents, bulk windshield washer fluid	Phone: 203-238-6771 Fax: 203-630-4415	
Carey Wiping Materials Corp. Cloth and paper wipers, environmental spill products	Phone: 860-224-2459 Fax: 860-229-7870	www.careywiping.com
Chem Station New England Water-based detergents and cleaners, less hazardous parts washing systems	Phone: 860-291-2881 Fax: 860-291-2864	www.chemstationne.com
Clayton Associates, Inc. Automotive brake cleaning equipment and HEPA-Filter vacuum sanding equipment	Phone: 1-800-248-8650 Fax: 732-364-6084	www.jclayton.com
Connecticut Cleaning & Heating Equipment Aqueous automatic parts washers and waste oil furnaces and boilers	Phone: 1-800-727-3295 Fax: 860-658-3765	
Dawg, Inc. Recycled absorbent socks, pillowcases, pads	Phone: 1-800-YEL-DAWG (935-3294) Fax: 1-800-LIL-PAWS (545-7297)	www.dawginc.com
Hubbard Hall Service Less hazardous parts washing systems	Phone: 203-756-5521 Fax: 203-756-9017	www.hubbardhall.com
New Pig Absorbent mats, socks, pillows, wipers and rags	Phone: 800-HOT-HOGS (468-4647)	www.newpig.com
Northeast Industrial Flooring Chemical resistant coatings for floors, concrete repair and sealing	Phone: 860-282-3920 Fax: 860-293-5922	
Northeast Lamp Recycling Fluorescent lamp recycling *Call DEP at 860-424-3297 for other resources*	Phone: 888-457-5267	www.nhlamp.com
Odor Gone of Connecticut Non-chemical odor control additive for use with washing systems and gray water tanks	Phone: 860-564-8968	www.odorgone.com

DEFINE ALL POTENTIAL WASTE STREAMS

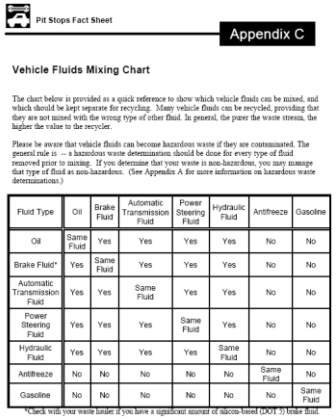
1. Used Oil
2. Rags & Absorbents
3. Antifreeze
4. Windshield Fluid
5. Fuel, Tanks & Filters
6. Lead-Acid Batteries
7. Mercury Switches
8. Electronic Equipment
9. Mercury Lamps
10. Oil / Water Separators
11. Parts Cleaning
12. Refrigerants
13. Tires
14. Lab Pack
15. Scrap Metal
16. Air Bags





Potential Waste Streams

Waste Stream	Recommended Handling Method
Absorbents	Disposal is dependent the waste absorbed. Handle as hazardous waste if absorbed material is hazardous or conduct hazardous waste determination if unknown.
Air Bag Cartridges	Undeployed cartridges can be sold for reuse or disposed of at a permitted hazardous waste facility by a permitted transporter.
Antifreeze	Can be reused. Recycle with on-site equipment, on-site mobile service or off-site at a permitted recycling facility.
Brake Fluid	May be mixed with used oil if not contaminated by a hazardous waste.
Fluorescent	Conduct a hazardous waste determination and recycle through service provider. If determined to be hazardous, dispose of at a permitted hazardous waste facility by a permitted transporter.
Fuel Filters	Use in facility vehicles. If not fit for use, dispose as hazardous waste or send for fuel blending.
Gear Oil	May be mixed with used oil if not contaminated by a hazardous waste.
Hydraulic Fluid	May be mixed with used oil if not contaminated by a hazardous waste.
Lead Acid Batteries	Must be recycled; avoid storing for more than 6 months.
Mercury Switches/Lamps	Contract with a permitted hazardous waste transporter to haul to a permitted recycling or disposal facility.
Power Steering Fluid	May be mixed with used oil if not contaminated by a hazardous waste.
Rags	Conduct hazardous waste determination. If hazardous, manage as a hazardous waste by sending to an industrial laundry service or disposing of at a permitted disposal facility.
Refrigerants/CFCs	Recover using EPA approved equipment; do not release to the air.
Scrap Metal	Recycle.
Tires	Recycle, sell or dispose of properly; do not accumulate over 10 cubic yards of tires (approximately 70 to 80 tires).
Transmission Fluid/Filters	Recycle fluid with used oil, drain filter and recycle.
Used Oil	Ship off-site for recycling or burn on-site in space heater provided certain conditions are met.
Used Oil Filters	Drain oil, recycle filter.



Pit Stops Fact Sheet

Appendix C

Vehicle Fluids Mixing Chart

The chart below is provided as a quick reference to show which vehicle fluids can be mixed, and which should be kept separate for recycling. Many vehicle fluids can be recycled, providing that they are not mixed with the wrong type of other fluid. In general, the purer the waste stream, the higher the value to the recycler.

Please be aware that vehicle fluids can become hazardous waste if they are contaminated. The general rule is -- a hazardous waste determination should be done for every type of fluid removed prior to mixing. If you determine that your waste is non-hazardous, you may manage that type of fluid as non-hazardous. (See Appendix A for more information on hazardous waste determinations.)

Fluid Type	Oil	Brake Fluid	Automatic Transmission Fluid	Power Steering Fluid	Hydraulic Fluid	Antifreeze	Gasoline
Oil	Same Fluid	Yes	Yes	Yes	Yes	No	No
Brake Fluid*	Yes	Same Fluid	Yes	Yes	Yes	No	No
Automatic Transmission Fluid	Yes	Yes	Same Fluid	Yes	Yes	No	No
Power Steering Fluid	Yes	Yes	Yes	Same Fluid	Yes	No	No
Hydraulic Fluid	Yes	Yes	Yes	Yes	Same Fluid	No	No
Antifreeze	No	No	No	No	No	Same Fluid	No
Gasoline	No	No	No	No	No	No	Same Fluid

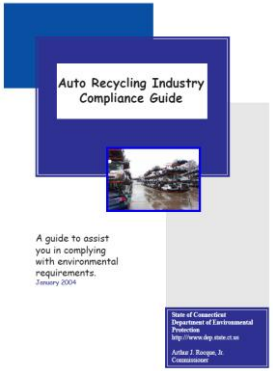
*Check with your waste hauler if you have a significant amount of silicon-based (DOT 5) brake fluid.

2004 Pit Stops Fact Sheets
Connecticut Department of Environmental Protection, 79 Elm Street, Hartford, CT 06106-5127
Office of Pollution Prevention (860) 424-3297 www.dep.state.ct.us/wstinj/2vehicle/vhmaker.htm
Fact Sheet: DEP-P2-PITSTOPS-FS-023 Last Updated: August, 2004

IDENTIFY APPLICABLE REGULATIONS

WASTE CHARACTERIZATION:

- Hazardous Waste (RCRA)⇨40 CFR 260-270
- Used Oil⇨40 CFR 266 (Subpart E) & 279
- Universal Waste⇨40 CFR 273
- CT Regulated Wastes⇨CGS Sec. 22a-454

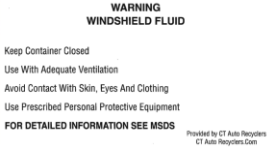


GUIDANCE DOCUMENT:

Auto Recycling Industry Compliance Guide

INCORPORATE OTHER REGULATIONS:

- DOT Hazardous Materials⇨49 CFR 172/173
- EPCRA (Right-to Know-Act)⇨40 CFR 355
- OSHA⇨29 CFR 1910



BUILD ON EXISTING PROGRAMS

Use of Existing Materials, Examples:

- Used Oil ⇨ Burned for Heat
- Fuels ⇨ Burned as Fuel
- Lead-Acid Batteries ⇨ Resold or Recycled
- Air Bags ⇨ Resold
- Mercury Switches ⇨ Recycled
  - ✓ National Auto Recyclers Program In-Place


Rags

Contaminated rags (also called wipes, wipers, and shop towels) that are improperly managed may pose fire, health and environmental risks.

How Do I Manage Used Rags?

How used rags are managed depends on what they are contaminated with. If the used rag is:

- Dripping with used oil, manage as used oil (see Used Oil Fact Sheet).
- Contaminated with used oil, but not dripping, test for hazardous waste then properly manage.
- Contaminated with paints or solvents, or other hazardous materials, manage as hazardous waste.
- Contaminated with non-hazardous materials such as waxes, polishing compounds, etc., manage as solid waste if only a small number are generated (1 or 2 per dumpster). If significant numbers of these rags are generated, however, they must be segregated and managed as Connecticut-regulated waste.
- Contaminated with other material (or only with mild cleaners or soaps), dispose of in regular trash.

If you lease rags and have them laundered, and they are contaminated with hazardous waste, you must manage them as hazardous waste until they are picked up for laundering. However, they do not require a hazardous waste manifest.

Keep oily rags separate from other rags that have been contaminated with hazardous materials such as solvents.

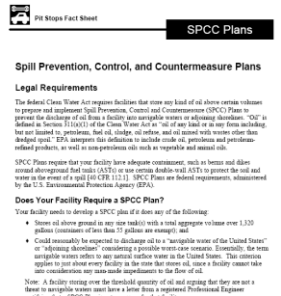
Remove excess solvent from rags by wringing or pressing excess into a coverable container, or store rags in a double-bottomed drum that allows the solvent to drip where it can be collected and recycled or managed appropriately.

Store ignitable rags in NFPA approved, labeled containers until they are picked up for laundering or disposal.

Contract with a permitted industrial laundry service that delivers clean cloth rags and will pick up the soiled rags on a regular basis. The laundry service may require you to limit the solvent and other chemical content of the soiled rags because of the limits on their permit to discharge wastewater into the sanitary sewer.

All laundries in Connecticut that handle industrial rags must have a wastewater discharge permit from the CT-DEP. Have your laundry service certify that they hold the appropriate permits and they are in compliance with the permit conditions. For a list of facilities that have valid discharge permits and their compliance status with the permit conditions, call the CT-DEP at 860/424-3018 and ask for the "engineer of the day".

Proper storage of used rags


Pit Stops Fact Sheet

SPCC Plans

Spill Prevention, Control, and Countermeasure Plans

Legal Requirements

The federal Clean Water Act requires facilities that store any kind of oil above certain volumes to prepare and implement Spill Prevention, Control and Countermeasure (SPCC) Plans to prevent the discharge of oil from a facility into navigable waters or adjoining shorelines. "Oil" is defined in Section 311(a)(1) of the Clean Water Act as "oil of any kind or in any form including, but not limited to, petroleum, fuel oil, sludge, oil refuse, and oil mixed with wastes other than dredged spoil." EPA interprets this definition to include crude oil, petroleum and petroleum-refined products, as well as non-petroleum oils such as vegetable and animal oils.

SPCC Plans require that your facility have adequate containment, such as berms and dikes around aboveground fuel tanks (ASTs) or use certain double-wall ASTs to protect the soil and water in the event of a spill [40 CFR 112.1]. SPCC Plans are federal requirements, administered by the U.S. Environmental Protection Agency (EPA).

Does Your Facility Require a SPCC Plan?

Your facility needs to develop a SPCC plan if it does any of the following:

- Stores oil above ground in any size tank(s) with a total aggregate volume over 1,320 gallons (containers of less than 55 gallons are exempt); and
- Could reasonably be expected to discharge oil to a "navigable water of the United States" or "adjoining shorelines" considering a possible worst-case scenario. Essentially, the term navigable waters refers to any natural surface water in the United States. This criterion applies to just about every facility in the state that stores oil, since a facility cannot take into consideration any man-made impediments to the flow of oil.

Note: A facility storing over the threshold quantity of oil and arguing that they are not a threat to navigable waters must have a letter from a registered Professional Engineer certifying that a SPCC Plan is not necessary for that facility.

What is an SPCC Plan?

An SPCC Plan outlines a facility's oil containment systems and procedures to prevent an oil spill. It also outlines oil spill response and clean up protocols. Even if you are not required to have a formal SPCC Plan, you should still consider implementing the common sense practices that are part of a spill plan.

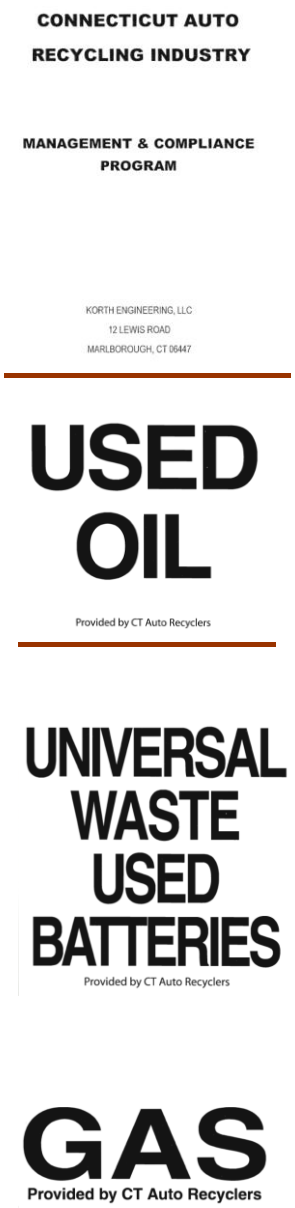
Combine / Coordinate with Other Programs:

- Stormwater, SPCC ⇨ Training, Inspections
- EPCRA / OSHA ⇨ Labeling, Reporting

DEVELOP STANDARD PRACTICES

Management & Compliance Manual

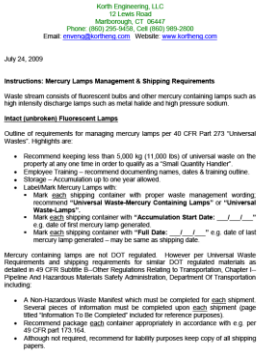
- General Program Reference Documents
- Separate Section for Each Waste Stream
  - General Information ⇨ Management Instructions, Profiles, Shipping Papers
  - Reference Documents ⇨ DEP Fact Sheets
  - Waste Characterization Data
    - ✓ Compliance Summary Form
    - ✓ Support Data – Analytical, MSDS's
- Container Labels ⇨ Material Segregation
- Acceptable Vendors & Disposal Methods



KEEP IT SIMPLE FOR USER

- Document Waste Characterization Efforts
  - Legally⇨Anyone Can Perform, However:
  - Hazardous Waste (RCRA)⇨Complex Rules
  - Suggest By Knowledgeable Professional
  - Use⇨Sample Data & Process Knowledge
- Vendor Forms⇨Profiles, Shipping Papers
- Checklists⇨Routine Tasks
- Integrate BMP's with Existing Programs
  - Training
  - Inspections
  - Records Retention


WASTE CHARACTERIZATION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July 24, 2009

Instructions: Mercury Lamps Management & Shipping Requirements

Waste stream consists of fluorescent bulbs and other mercury containing lamps such as high intensity discharge lamps such as metal halide and high pressure sodium.

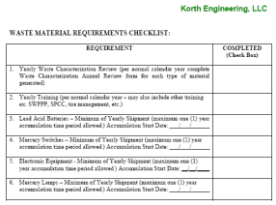
Intact (unbroken) Fluorescent Lamps

Outline of requirements for managing mercury lamps per 40 CFR Part 273 "Universal Wastes". Highlights are:

- Recommend keeping less than 5,000 kg (11,000 lbs) of universal waste on the property at any one time in order to qualify as a "Small Quantity Handler"
- Employee Training – recommend documenting names, dates & training outline.
- Storage – Accumulation up to one year allowed.
- Label/Mark Mercury Lamps with:
  - Mark each shipping container with proper waste management wording; recommend **"Universal Waste-Mercury Containing Lamps"** or **"Universal Waste-Lamps"**.
  - Mark each shipping container with **"Accumulation Start Date:** __/__/__" e.g. date of first mercury lamp generated.
  - Mark each shipping container with **"Full Date:** __/__/__" e.g. date of last mercury lamp generated – may be same as shipping date.

Mercury containing lamps are not DOT regulated. However per Universal Waste Requirements and shipping requirements for similar DOT regulated materials as detailed in 49 CFR Subtitle B--Other Regulations Relating to Transportation, Chapter I--Pipeline And Hazardous Materials Safety Administration, Department Of Transportation including:

- A Non-Hazardous Waste Manifest which must be completed for each shipment. Several pieces of information must be completed upon each shipment (page titled "Information To Be Completed" included for reference purposes).
- Recommend package each container appropriately in accordance with e.g. per 49 CFR part 173.164.
- Although not required, recommend for liability purposes keep copy of all shipping papers.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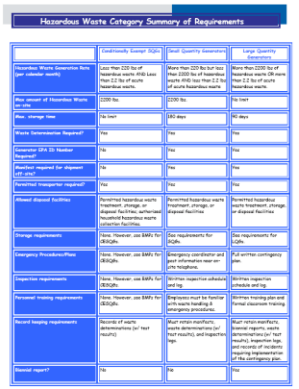
WASTE MATERIAL REQUIREMENTS CHECKLIST:

REQUIREMENT	COMPLETED (Check Box)
1. Yearly Waste Characterization Review (per normal calendar year complete Waste Characterization Annual Review form for each type of material generated)	
2. Yearly Training (per normal calendar year – may also include other training ex. 5/8/999, SPCC, tire management, etc.)	
3. Lead Acid Batteries – Minimum of Yearly Shipment (maximum one (1) year accumulation time period allowed.) Accumulation Start Date: _____	
4. Mercury Switches – Minimum of Yearly Shipment (maximum one (1) year accumulation time period allowed.) Accumulation Start Date: _____	
5. Electronic Equipment - Minimum of Yearly Shipment (maximum one (1) year accumulation time period allowed.) Accumulation Start Date: _____	
6. Mercury Lamps – Minimum of Yearly Shipment (maximum one (1) year accumulation time period allowed.) Accumulation Start Date: _____	

PROGRAM BENEFITS

Minimize or Improve Regulatory, Operational:

- Requirements⇨Ex: Record Keeping, Plans
- Audits⇨More $$'s React to Problems
- Liability & Risks⇨Cleanup, Lawsuits
- Incidents⇨Fire, Explosion, Spill, Exposure
- Costs⇨Material Disposal, Insurance
- Visual Site Appearance⇨Organization
- Public Opinion⇨"Green Is In"



Avoid CT Transfer Act - BIG $$'s:

- "Establishment"⇨Generate > 100 kg / Month (220 lbs.) Hazardous Waste

PROGRAM MUST BE COST EFFECTIVE

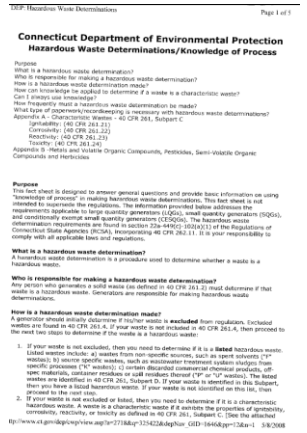
HOW?

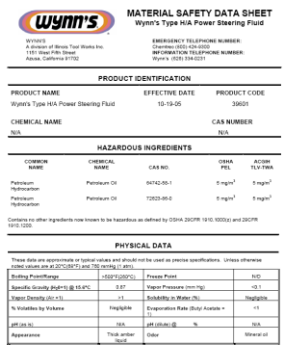
Cooperative Efforts:

- CAR ⇨ Contracted Manual Preparation
- CAR ⇨ Generates Labels for Members
- CAR ⇨ Provides Training for Members
- CAR ⇨ Assists in Identifying Vendors
- CAR Members ⇨ Offered Solutions

Process Management Allows for:

- Preventing Cross Contamination
  - Minimize Sampling Costs
  - Manage Off-Site Disposal Costs


Connecticut Department of Environmental Protection
Hazardous Waste Determinations/Knowledge of Process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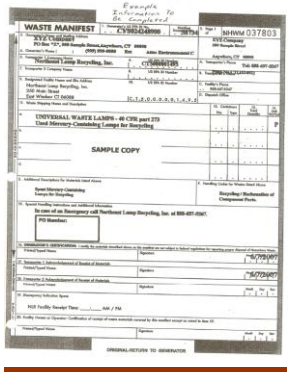
MATERIAL SAFETY DATA SHEET
Wynn's Type H/A Power Steering Fluid


WASTE MANIFEST
SAMPLE COPY

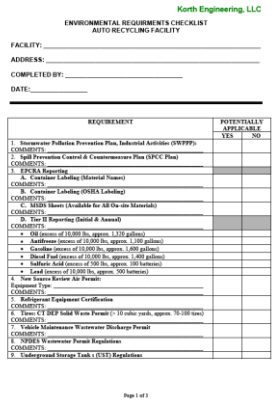
APPLICABILITY

How Can My Facility Be a CESQG?

- Overall Program Basis ⇨ Manufacturing
- Material Segregation ⇨ Labeling
- Material Substitution
- Regulatory Exemptions
  - ✓ Universal Wastes
  - ✓ Reuse as a Commercial Chemical Product
  - ✓ Specific Regulations ⇨ Ex: Used Oil
  - ✓ Hazardous Waste Permits By Rule
- Existing Information⇨Manual, Fact Sheets
- Waste Characterization Documentation

Korth Engineering, L.L.C. – Environmental Consultants

Comprehensive Environmental Compliance Programs



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ENVIRONMENTAL REQUIREMENTS CHECKLIST
AUTO RECYCLING FACILITY

FACILITY: _____

ADDRESS: _____

COMPLETED BY: _____

DATE: _____

REQUIREMENT	POTENTIALLY APPLICABLE YES	NO
1. Stormwater Pollution Prevention Plan, Industrial Activities (SWPPP): COMMENTS:		
2. Spill Prevention Control & Countermeasures Plan (SPCC Plan) COMMENTS:		
3. EPCRA Reporting		
A. Container Labeling (Material Names) COMMENTS:		
B. Container Labeling (OSHA Labeling) COMMENTS:		
C. MSDS Sheets (Available for All On-site Materials) COMMENTS:		
D. Tier II Reporting (Initial & Annual) COMMENTS:		
• Oil (excess of 10,000 lbs, approx. 1,320 gallons)		
• Antifreeze (excess of 10,000 lbs, approx. 1,160 gallons)		
• Gasoline (excess of 10,000 lbs, approx. 1,600 gallons)		
• Diesel Fuel (excess of 10,000 lbs, approx. 1,400 gallons)		
• Sulfuric Acid (excess of 500 lbs, approx. 100 batteries)		
• Lead (excess of 10,000 lbs, approx. 500 batteries)		
4. New Source Review Air Permit: Equipment Type: COMMENTS:		
5. Refrigerant Equipment Certification COMMENTS:		
6. Three CT DEP Solid Waste Permit (> 10 cubic yards, approx. 70-100 tires) COMMENTS:		
7. Vehicle Maintenance Wastewater Discharge Permit COMMENTS:		
8. NPDES Wastewater Permit Regulations: COMMENTS:		
9. Underground Storage Tank s (UST) Regulations		

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Additional Resources

- **DEP RCRA Help Website**
  - **www.ct.gov/DEP/RCRAhelp**
- **CESQG Handbook**
  - **www.ct.gov/DEP/hazardouswaste**
- **Auto Recycling Industry Compliance Guide (January 2004)**
- **Pit stops Fact Sheet (July 2005)**
- **CAR (Connecticut Auto Recyclers Association)**
  - **http://ctautorecyclers.com**
- **COMPASS (Compliance Assistance)**
  - **Hotline: 1-888-424-4193**
  - **Consultative Audits (Free)**
  - **HWAC (Hazardous Waste Advisory Committee) Training**