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ASSOCIATION

# A GUIDE FOR AUTO BODY SHOPS



Washington State Department of Ecology  
Hazardous Waste and Toxics Reduction Program  
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**Reduce Waste**  
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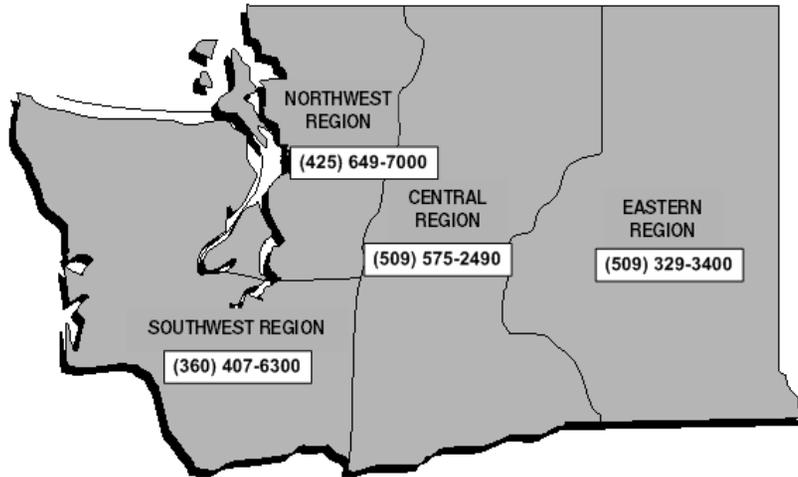
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◆ WHY SHOULD AUTO BODY SHOPS  
PAY ATTENTION TO THEIR WASTES? ◆

The Department of Ecology wishes to recognize the many automotive associations listed on the back cover and the automotive businesses who contributed their time and expertise in creating this booklet.

While this booklet summarizes some of the requirements for generators of automotive waste under the Dangerous Waste Regulations (Chapter 173-303 WAC), it does not replace them. Always refer to the regulations themselves for more details or contact the nearest Ecology regional office.



◆ DEPARTMENT OF ECOLOGY REGIONAL OFFICES ◆

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(425) 649-7000

**Central Regional Office**  
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300 Desmond Drive  
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Olympia, WA 98504-7775  
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**Eastern Regional Office**  
North 4601 Monroe  
Suite 100  
Spokane, WA 99205-1295  
(509) 329-3400

Auto body shops across the state regularly generate hazardous wastes. Car preparation, painting and other activities in your auto body shop produce hazardous wastes such as spent solvents, thinners, still bottoms, waste paint and waste antifreeze.

If improperly managed, these wastes may threaten the safety of you and your co-workers, damage the environment, or put your entire community at risk. Hazardous wastes can cause cancer and nerve damage and pollute drinking water supplies.

Your role in protecting public health and the environment is vital. Auto body hazardous wastes don't belong on the ground, down the drain or in the dumpster. Good hazardous waste management practices are important for many reasons:

- You will ensure that you're in compliance with hazardous waste regulations and avoid costly penalties.
- You may save money by finding ways to reduce or recycle your wastes.
- You will be joining other auto body shops in Washington state that are taking pride in maintaining a clean and healthy environment.
- You may gain customers who know they have made a wise choice when selecting a shop that protects the environment.



◆ AUTO BODY SHOP WASTES ◆  
 PRACTICAL DO'S AND DON'TS

Some common auto body shop waste categories are described below, along with do's and don'ts for managing them safely and in compliance with the regulations. Make sure you find out what size of generator you are and what responsibilities you have, beginning on page 13.

ANTIFREEZE ----- ◆

If used antifreeze is recycled, it doesn't need to be counted or manifested as a hazardous waste. If used antifreeze is otherwise disposed, it is subject to full regulation, including counting unless the generator can document that the antifreeze is not hazardous.

*Do's*

- ✓ Recycle your own antifreeze or use a recycling service. Keep records of your recycling activities.
- ✓ Consider keeping a separate container for antifreeze that can be reused as a product in your shop without further treatment. Be sure to label this container differently than your waste antifreeze.
- ✓ Consider using secondary containment for containers of liquid waste.
- ✓ Write the words "SPENT ANTI-FREEZE" and "TOXIC" on your **waste** antifreeze container.
- ✓ Keep volumes of used antifreeze low by properly and routinely recycling it.

*Don'ts*

- ✗ Don't dispose of antifreeze to the sewer.
- ✗ Don't ever dispose of antifreeze to a storm drain, septic tank, or dry well, and never pour antifreeze on the ground.
- ✗ Don't mix waste antifreeze with any other waste. Keep it separate.

◆ WHERE TO GET MORE HELP ◆

It's your responsibility to safely manage wastes generated at your facility. Don't be afraid to ask for help. Ecology can help you keep up-to-date and in compliance with the regulations. For additional information and assistance, contact the nearest Ecology Regional Office and ask for a Hazardous Waste Specialist. To receive any of the following publications, contact Ecology's Publications Office at (360) 407-7472 or visit our website at [www.ecy.wa.gov](http://www.ecy.wa.gov).

**Clean Air Washington Information Packet**  
 (1992, #FA92-13)

**Discussion on the Toxicity Characteristic Rule**  
 #96-427

**Free Help for Businesses**  
 #96-407

**Shoptalk**, a quarterly newsletter for hazardous waste generators (Now online! [www.ecy.wa.gov/programs/hwtr/shoptalkonline/index.html](http://www.ecy.wa.gov/programs/hwtr/shoptalkonline/index.html))

**Step by Step: Fact Sheets for Hazardous Waste Generators**, includes Glossary, Subject Index, and Services Directory  
 #91-12a-s, Revised 2000

**Success Through Waste Reduction - Proven Techniques from Washington Businesses** #90-22

**The Dangerous Waste Regulations** (Chapter 173-303 WAC) #92-91

**Hazardous Waste Services Directory** #98-412 (Now online!!  
[www.ecy.wa.gov/apps/hwtr/hwsd/default.htm](http://www.ecy.wa.gov/apps/hwtr/hwsd/default.htm))

**Waste Reduction for Your Business**  
 #89-56, Revised 1991

**Waste Reduction for Vehicle Maintenance Shops**  
 #92-107

**Waste Minimization for Production Painting Operations**  
 #96-405

**What is a Small Quantity Generator: Your Regulatory Status Under the Dangerous Waste Regulations**  
 #96-404

**Treatment by Generators Fact Sheets Elementary Neutralization**  
 #96-417

**Evaporation Treatment Specific Guidance**  
 #96-414

**Separation Treatment Specific Guidance**  
 #96-418

◆ AUTO BODY HAZARDOUS WASTES ◆  
BY WASTE CATEGORY

The following table shows where typical auto body shop wastes fall in the state's hazardous waste categories. Your wastes may be different, depending on the chemicals and processes you use. Testing may be necessary to determine whether certain wastes are hazardous.

MAJOR CATEGORY	HAZARDOUS WASTE TYPE	AUTO BODY SHOP EXAMPLES
Listed Wastes	Discarded Chemical Products	not typically generated by auto body shops
	Dangerous Waste Sources	chlorinated solvents
		contaminated oil
Characteristic Wastes	Ignitable	spent thinners and solvents
	Corrosive	conversion coatings
	Reactive	not typically generated by auto body shops
	Toxicity Characteristic (TCLP)	
		paint booth filters (possible)
		paint wastes
Criteria Wastes	Toxic	waste antifreeze
	Persistent	methylene chloride solvent
		other solvents with word "chlor" as part of main ingredients

BATTERIES ----- ◆

Spent lead acid batteries are hazardous wastes if they are not recycled or returned to a battery manufacturer for regeneration.

*Do's*

- ✓ Avoid long-term storage of batteries by sending them to a reclaimer at least every six months.
- ✓ Store batteries upright in a secure, covered place and check them often for leaks.

*Don'ts*

- ✗ Don't store batteries outside.
- ✗ Don't put batteries in the garbage.
- ✗ Don't drain batteries into a drain or on the ground.

CAR PREP & BODY WORK WASTES ----- ◆

Masking tape, overspray paper and body filler dust from sanding are not typically hazardous, once the paint has cured on these wastes.

*Do's*

- ✓ Use the least amount of masking tape and paper possible.
- ✓ Sweep up filler dust separately and dispose of it in the dumpster.

*Don'ts*

- ✗ Don't mix filler dust with wash waters, paint waste or sludge--this increases the amount of waste you must pay to dispose of.

If floors are kept generally clean to begin with and a non-toxic floor cleaner is used, wash water from floor cleaning shouldn't typically be hazardous. However, wash water may contain heavy metals or grease that need to be treated before discharging to the sewer, in order to meet water quality discharge limits.

*Do's*

- ✓ Keep your floors clean to begin with. Catch leaks before they hit the floor and place in appropriate waste container.
- ✓ Clean small, non-chlorinated spills immediately with absorbent. Sweep and save for reuse until absorbing ability is gone. It can then go in the dumpster (with local landfill approval).
- ✓ Receive permission from your local sewer utility for your floor cleaning wastes to enter the sewer.
- ✓ Use absorbent pads and wring them out to the appropriate waste container when saturated.

*Don'ts*

- ✗ Don't use absorbents to clean-up chlorinated solvents and then dispose in the dumpster. These are hazardous wastes.
- ✗ Don't let floor cleaning waste water go to an outside or inside storm drain, dry well, or septic system.
- ✗ Don't let paint residues build up on the floor and then hose them down a drain or outside. These wastes may be hazardous.

**Check with your sewer utility or city engineering department to find out for sure where your drains lead - most outside drains and some inside drains don't go to a sewage treatment plant, but instead are storm drains that lead directly to a stream, lake or ditch or to drywells which may contaminate ground water.**

## STEP 9 MANIFEST SHIPMENTS OF HAZARDOUS WASTE

To ship hazardous wastes off-site, Regulated Generators must prepare a Uniform Hazardous Waste Manifest Form which identifies the contents of the shipment, the transporters used and the permitted facility receiving the wastes. This form accompanies the waste from the site where it is generated to its ultimate resting place and back to you for your records. If you are a Regulated Generator your waste hauler needs to use a manifest and not just issue a bill of lading or receipt.

Some hazardous wastes are restricted from land disposal unless they meet specific treatment standards. If you send your waste off-site for disposal, you must prepare and sign a certification which states that either your waste is not restricted from land disposal or that it meets the treatment standards outlined in the regulations. This land disposal restriction certificate is attached to the manifest form for the shipment.

Often the waste hauler fills out these forms and you just sign them. You should carefully check all information before signing.

If a signed return copy of the manifest has not been received from the waste management facility within 35 days of the shipment date, you must try to determine what has happened. Submit an exception report documenting your efforts to Ecology if you have not received the last copy of the manifest form within 45 days of the shipment date.

## STEP 10 KEEP RECORDS OF HAZARDOUS WASTE ACTIVITIES

There are a number of records, reports and forms auto body shops must prepare under the Dangerous Waste Regulations and keep on the premises for at least five years, including annual reports, manifest forms, exceptions reports, and land disposal restriction certificates. Keep copies of notification reports (Form 2), inspection records, results from waste analyses or tests, and on-site recycling records for as long as you are in business.

## STEP 6 PLAN FOR EMERGENCIES

There must be an emergency coordinator on the premises or on call at all times who is familiar with the operations and activities at the site and has the authority to commit the resources necessary to deal with a hazardous waste emergency. In a small shop, this will probably be the owner or manager.

Planning for emergencies can help prevent a small spill from turning into a dangerous and expensive contamination problem. Make sure you train your employees to know how to react to different types of emergencies in your shop.

## STEP 7 USE PROPER CONTAINERS AND MANAGE THEM CORRECTLY

Many hazardous waste incidents and work-related injuries are linked to improper or unsafe container management. To avoid these preventable accidents:

- Accumulate your wastes in containers which are sturdy, compatible, leak-proof, properly labeled, and kept closed unless waste is being added or removed;
- Do not accumulate incompatible wastes in the same container or in the same areas;
- Store reactive and ignitable wastes according to the Uniform Fire Code;
- Maintain a minimum aisle space of 30 inches between container rows; and
- Inspect containers and storage areas at least once a week, keeping a log of inspections.

## STEP 8 ARRANGE FOR PROPER TRANSPORTATION AND DISPOSAL

As a generator of hazardous waste, you are responsible for following regulations for the safe transportation and disposal of your waste, even after it leaves your premises. Before transporting hazardous waste off-site, you need to make sure it is packaged, labeled and marked in accordance with U.S. Department of Transportation hazardous material regulations. Call (360) 753-6427.

Regulated Generators must hire a transporter that has a RCRA Identification Number and ensure wastes are handled at a permitted hazardous waste treatment, storage or disposal (TSD) facility or at a facility that legitimately recycles or reclaims hazardous waste. Small Quantity Generators can transport their own wastes or make sure they are sent to a:

- permitted hazardous waste facility;
- legitimate recycler;
- facility permitted to handle moderate risk waste; or
- a permitted solid waste facility, if allowed by the local health department.

## PAINT BOOTH FILTERS ----- ◆

Paint booth filters may or may not be hazardous, largely depending on if they are changed on a regular basis, if they are dry, and if they contain paint with heavy metals such as chromium, nickel or lead.

### *Do's*

- ✓ Determine through testing whether your filters are hazardous. (See page 11 for discussion.)
- ✓ Check with your waste hauler before melting styrofoam filters in your solvent barrel.

### *Don'ts*

- ✗ Don't dispose of paint filters containing chromium, lead, or other heavy metals in the garbage.

## PAINT WASTE ----- ◆

Off-spec or waste paint is typically hazardous because it is listed, ignitable, toxic or contains heavy metals. Low volatile organic compound (VOC) solvent based or water-based paints help reduce volatile organic compound (VOC) emissions.

### *Do's*

- ✓ Consider the benefits of a computerized paint mixing system. This can reduce the amount of off-spec paint and its disposal cost.
- ✓ Use water-borne primers and keep informed about new developments in water-based top coats.
- ✓ Have paint cups of various sizes and use smaller paint cups when possible. This helps you avoid overmixing paint and reduces the amount of solvent needed to clean up.

### *Don'ts*

- ✗ Don't dispose of waste paint down any storm drain, septic system, dry well or sewer. This can lead to water contamination and liability problems for you.
- ✗ Don't get in the habit of mixing a standard amount of paint for every job (1 quart, 1 pint, etc.) Mix only what you will use.
- ✗ Don't buy more paint products than you need--the less paint on the shelf, the less potential waste.
- ✗ Don't evaporate paint wastes. This is a form of illegal disposal.

## SHOP TOWELS -----◆

If your towels are handled according to the advice below, they do not need to be managed and counted as a hazardous waste. If your towels are being disposed of they are hazardous waste if they fail any hazardous waste tests (ignitable, toxic, etc.) or have listed solvents on them.

### *Do's*

- ✓ Use cloth towels which can be cleaned and reused.
- ✓ When possible, use less hazardous cleaning solvents (ones without chlorinated compounds).
- ✓ See if the laundry/recycling facility you use is meeting local sewer discharge limits. Laundries/recyclers that discharge their waste water to a drain field should be avoided.
- ✓ Keep waste shop towels in a closed container marked "CONTAMINATED SHOP TOWEL ONLY".

### *Don'ts*

- ✗ Don't throw dirty towels into your dumpster.
- ✗ Don't saturate towels. If you do, wring them out and reuse the liquid.
- ✗ Try not to use disposable paper towels or rags. If you do, see if they designate as a hazardous waste and handle appropriately.
- ✗ Don't dispose of solvents by pouring them into containers of used shop towels.

## SPRAY CANS -----◆

If you throw out partially empty spray cans of degreasers, they are typically regulated as hazardous waste because they contain ignitable, chlorinated solvents.

### *Do's*

- ✓ Use up an entire spray can before starting another.
- ✓ If a spray can malfunctions (for example, if the tip breaks off), handle as hazardous waste or consider returning it to your supplier.

### *Don'ts*

- ✗ Don't throw partially empty spray cans into the dumpster.
- ✗ Don't use spray cans over solvent tanks, parts washers, or anything which could cause the solvents from the spray can to cross-contaminate the other wastes.

## STEP 3 REPORT ANNUALLY

If you have an active RCRA Identification Number, you must submit an annual report (Dangerous Waste Annual Report forms) by March 1 of each year, even if you have not generated waste in that year. Record your hazardous waste activities for the previous calendar year on this report, including how much waste you've generated or accumulated on-site and waste you've sent off-site.

To assist generators, annual reporting is covered at workshops that are typically held at various locations in the state in January and February.

## STEP 4 PERFORM PREVENTIVE MAINTENANCE

Hazardous wastes must be handled in a manner that prevents leaks, spills, fires and explosions. Develop and follow a written inspection schedule for all hazardous waste storage areas, containers and tanks and include all emergency, safety and monitoring equipment on-site.

Keep the necessary emergency equipment (such as fire extinguishers and telephones) on hand and accessible to employees. You must regularly test and maintain all your emergency equipment. Notify local authorities (such as police, fire departments and local hospital) of the characteristics of hazardous waste generated at your site, as well as the facility layout and access routes.

## STEP 5 PROPERLY ACCUMULATE HAZARDOUS WASTE

Auto body shops that generate less than 2,200 lbs. per month or batch can accumulate their hazardous waste for up to 180 days from the date it is first generated before they must manage it on-site or send it to an appropriate facility. Generators of 2,200 lbs. or more per month may only accumulate wastes for 90 days.

While accumulating your wastes, you must follow requirements for safe and proper storage, labeling and management of wastes:

- Establish and clearly mark an accumulation area. Don't have wastes scattered all over your shop, although you may accumulate wastes in satellite accumulation areas as described in -200(2) and in Ecology's Satellite Accumulation Guidance. If constructed after September 30, 1986, your accumulation area must have a containment system, such as a diked concrete area, that is capable of holding leaks and spills.
- Place the waste in an appropriate container and mark it with:
  - the words "Hazardous Waste" or "Dangerous Waste" (some generators find it more convenient to use hazardous waste labels);
  - a label identifying the waste's major risk(s) (for example, "ignitable"); and
  - the accumulation start date (when you first put the waste in the container).
- Comply with the requirements for preventive maintenance, emergency planning and container management summarized in Steps 4, 6, and 7 of the Guide.

# STEP 1 IDENTIFY YOUR WASTE AND GENERATOR STATUS

You must determine if any of your wastes are regulated as hazardous wastes by following the "designation" procedures in the Dangerous Waste Regulations. First look for each of your wastes on the Discarded Chemical Products and Dangerous Waste Sources Lists in the regulations. This is where you'll find **listed** wastes. Then, if the waste is not on the lists, determine if it exhibits any of the hazardous waste **characteristics** (ignitability, corrosivity, reactivity, leachability). If the waste is not on the lists, and does not exhibit a characteristic, then generators must evaluate their waste using available data or testing to see if they meet the **criteria** of toxicity or persistence. **Note:** Additional designation for criteria toxicity is required for small quantity generators (generating less than 220 lbs. per month and accumulating less than 2,200 at any time) to determine if a waste that has designated as a dangerous waste with a quantity exclusion limit of 220 pounds will also designate as an extremely hazardous waste, regulated at 2.2 pounds. Additional designation for the criteria of toxicity and persistence is also required in other specific instances, and generators should refer to WAC 173-303-070(5) for further guidance, or contact your nearest Ecology hazardous waste compliance specialist at: Bellevue (425) 649-7000, Olympia (360) 407-6300, Spokane (509) 456-2926 or Yakima (509) 575-2490.

To see how auto body wastes fit into the state's different hazardous waste categories, turn to page 18 (after Steps 1-10). Determine your generator status (see page 13). To request Step by Step Fact Sheet #1 for more help in designating your wastes, see page 19.

# STEP 2 OBTAIN A GENERATOR IDENTIFICATION NUMBER

If you are a regulated generator, you are required to notify Ecology of your hazardous waste activities and obtain a site-specific RCRA Identification Number using a Form 2 (available from Ecology). Many hazardous waste haulers and management facilities are also required to have an Identification Number. They may not accept your waste if you don't have an Identification Number - even if you're a Small Quantity Generator and aren't legally required to have one.

## SPRAY GUN WASTES ----- ◆

The solvents and thinners used in spray guns are typically hazardous because they are listed, ignitable and/or toxic.

### *Do's*

- ✓ Clean equipment immediately before waste builds up and hardens.
- ✓ Wash spray guns in an *enclosed* solvent-recycling gun washer or parts cleaner to reduce solvent evaporation.
- ✓ As spray gun solution gets dirty, add makeup thinner or solvent.
- ✓ Eliminate open air spraying of wash thinner to clean guns.
- ✓ Use automatic gun washers. They retain 90% of the solvents and vapors and reduce labor and exposure to solvents.

### *Don'ts*

- ✗ Don't dispose of spray gun wastes on the ground or down any storm drain, septic system, dry well or sewer.
- ✗ Don't use fresh solvent to clean guns. Use recycled waste thinners and reuse gun wash solvents.
- ✗ Don't use lacquer thinner if you can avoid it. Use other paint thinners which are lower in VOC emissions.

## SOLVENT TANKS OR PARTS WASHERS ----- ◆

Parts washer solvent tanks used for cleaning smaller parts and tools are often provided by waste haulers. Solvents used include mineral spirits, Stoddard solvent, petroleum naphtha, etc. and they become hazardous wastes the moment the waste service company exchanges the waste tank with a fresh tank. These spent solvents are hazardous because they are ignitable and/or toxic. Other solvents, such as those used for spot cleaning, are typically hazardous too.

### *Do's*

- ✓ Consider using less hazardous, non-chlorinated solvents or switching to a spray cabinet parts washer that doesn't use solvent.
- ✓ Consider purchasing or leasing a parts washer with a solvent still attached and recycling solvent on site. (Sludges, filters and still bottoms may be hazardous.)

### *Don'ts*

- ✗ Don't dispose of spent solvents to drains, the air, or the ground.
- ✗ Don't mix solvents with any other waste and keep different types of solvents in separate, labeled, closed containers.

continued

SOLVENT TANKS OR PARTS WASHERS (CONTINUED) ----- ◆

- |  |   |
|--|---|
| <p><i>Do's</i></p> <ul style="list-style-type: none"> <li>✓ Consider purchasing your own solvent still and recycling solvent on site yourself. (Sludges, filters and still bottoms will typically be hazardous.)</li> <li>✓ Have waste hauler exchange tank only when it is too dirty for further use.</li> <li>✓ Do remember to keep a log of dates, and recycled amounts if you recycle on site.</li> <li>✓ Extend the life of the solvent by topping off the tank from time to time.</li> <li>✓ Consider using a filter on aqueous tanks and solvent tanks with high suspended solids (diesel carbon).</li> </ul> | <p><i>Don'ts</i></p> <ul style="list-style-type: none"> <li>✗ Don't evaporate solvents as a means of disposal.</li> <li>✗ Don't dry parts just cleaned with an air hose. This simply wastes solvent and creates unnecessary VOC's.</li> <li>✗ Don't use spray cans over solvent tanks. This causes contamination of the solvent in the solvent tank.</li> </ul> |
|--|---|

SUMP SLUDGES ----- ◆

Sludges from your sump or oil/water separator may be a hazardous waste. You'll need to test the sludge at a professional laboratory to determine if it is hazardous, or save testing costs and assume the waste is hazardous and manage it accordingly.

- |   |   |
|---|---|
| <p><i>Do's</i></p> <ul style="list-style-type: none"> <li>✓ Have the sludge tested when pumped out (see page 10). Keep all records.</li> <li>✓ If the sludge is a hazardous waste, send it to a hazardous waste management facility.</li> <li>✓ Use a pumping service with an EPA Identification number to pump and transport your sludge.</li> </ul> | <p><i>Don'ts</i></p> <ul style="list-style-type: none"> <li>✗ Don't put hazardous sump sludge in the dumpster or on the ground.</li> <li>✗ Don't use a septic tank pumping service to remove this sludge. There is no legal, environmentally safe way for these services to dispose of the waste if it is hazardous.</li> </ul> |
|---|---|

◆ YOUR REQUIREMENTS AS A GENERATOR ◆

Auto body shops become Regulated Generators if they generate more than 220 lbs. of hazardous waste per month or batch or ever have more than 2,200 lbs. of hazardous waste on-site. Shops that generate less are Small Quantity Generators. 220 lbs. is about one half of a 55-gallon drum. Answer the following questions about the amount of hazardous waste your shop generates to determine your requirements as a generator. *Remember: Solvents, paints and other substances are not wastes until the day they are no longer usable or used.*

**PAINT WASTES**  
(multiply the gallons per month X 10) \_\_\_\_\_ LBS

**THINNERS & SOLVENTS**  
(multiply the gallons of waste per month X 8) \_\_\_\_\_ LBS

**STILL BOTTOMS**  
(pounds disposed of per month) \_\_\_\_\_ LBS

**PAINT BOOTH FILTERS**  
(pounds per month, if hazardous) \_\_\_\_\_ LBS

**WASTE ANTIFREEZE**  
(multiply only the gallons each month **not** to be recycled X 9) \_\_\_\_\_ LBS

**CONTAMINATED OIL**  
(multiply the gallons per month X 8) \_\_\_\_\_ LBS

**SUMP SLUDGES**  
(pounds of sludge per disposal, if hazardous) \_\_\_\_\_ LBS

**OTHER HAZARDOUS WASTES**  
(pounds per month) \_\_\_\_\_ LBS

TOTAL

- ✓ If any one answer or combination of answers totals over 220 lbs., you are a **Regulated Generator** required to meet compliance Steps 1-10 discussed below.
- ✓ You are a **Small Quantity Generator** if you always generate less than 220 lbs. of hazardous waste in one month and always dispose of the waste before you accumulate more than 2,200 lbs. Small quantity generators are required to comply only with Steps 1 and 8 (and 3 if you already have an active RCRA ID Number).

## ◆ WHY NOT REDUCE AND RECYCLE YOUR WASTES? ◆

Reducing hazardous waste in your auto body shop makes good business sense. Reducing waste, *before* you generate it, can help you to:

- ✓ avoid longterm liability concerns associated with generating hazardous wastes,
- ✓ save on hazardous waste management costs, and
- ✓ help create a healthier, safer work environment.

It may not be as hard as you think. A good place to start is to walk through your shop and review all of the processes which use toxic chemicals or generate hazardous waste. Pages 2 to 10 in this book will help you determine which wastes are likely to be hazardous.

As you consider each process, ask yourself if you can change the process in some way so that it doesn't produce hazardous waste. Some options are:

### **Substituting a less toxic raw material**

- Switch to less hazardous water-borne primers.
- Always ask for an MSDS before ordering any new product. Biodegradable or water-based does not necessarily mean environmentally safe, or that the product is exempt from regulations. Safe products that are mixed with hazardous substances may need to be handled as hazardous waste.

### **Use good operating practices**

- Solvent losses due to evaporation, equipment leaks or spills and inappropriate usage can range from 25-40%. Keep lids on all dip tanks which use solvents. Use dirty solvent first when cleaning parts.
- Control your inventory by tracking all purchases, shelf life, expiration dates and surplus waste generated. A good centralized inventory system can cut waste and costs dramatically.

### **Change your process**

- Explore the use of on-site distillation stills that are available, depending on the amount of solvent used, space available, shop management practices and other regulatory requirements.
- Contact a waste exchange service that helps companies with waste products (like wash thinners) find other companies that can use these products.

### **Recycle wastes and waste water which you can't reduce**

- Contract for a recycling service to pick up used solvent.
- Seal floor drains. Do not allow any cleaning solutions to enter the sewer.

## THINNERS AND SOLVENTS -----◆

Thinners and solvents used in paint preparation, painting and clean-up include acetone, toluene, xylene, etc., and are typically hazardous because they are listed, ignitable and/or toxic.

### *Do's*

- ✓ Treat thinner and solvent more like gold, less like water. Be conservative when using these products--add spigots or pumps to solvent containers.
- ✓ Use solvent until it loses its cleaning effectiveness, not just because it looks dirty.
- ✓ Recycle solvents and waste paint thinners. Investigate which option is best for you. Check with your trade association, other shops, and your paint jobber for ideas.
- ✓ Create a covered storage area for waste drums stored outside. Water and other contamination in your waste adds to the disposal cost.
- ✓ If you recycle on site, keep a log of dates, recycled amounts and batch makeup amounts.

### *Don'ts*

- ✗ Don't mix thinner and solvents with different types of waste. Save costs by keeping each type in a separate, marked container.
- ✗ Don't throw still bottoms in the dumpster or trash--they need to be disposed of as hazardous waste. (Still bottoms are the sludge or solid cakes left over from the still process or left in the bottom of the waste paint/thinner drum.)
- ✗ Don't leave the waste thinner drum uncovered and make sure it gets picked up by your waste hauler *before* it overflows. Label the drum as hazardous waste and add the date waste first enters the drum.

## USED OIL ----- ◆

EPA's decision not to list used oil as a hazardous waste means little change in the way shops in Washington state need to manage used oil. Used oil is regulated as a hazardous waste only if it has been mixed or contaminated with hazardous wastes such as solvents, or if it isn't recycled. (Recycling includes burning for energy recovery.)

### *Do's*

- ✓ Keep used oil in a separate container marked "USED OIL ONLY".
- ✓ Place your container in a secure area and train your technicians to keep it secure.
- ✓ Make sure used oil is tested to be "on spec" if you receive (or give) oil for burning from another business.
- ✓ Keep records of used oil testing and shipments.
- ✓ Contact your nearest Ecology regional office (see back cover) for guidance on used oil burners.

### *Don'ts*

- ✗ Don't ever dispose of used oil to a storm drain, septic tank, dry well, sewer or dumpster.
- ✗ Don't accidentally contaminate used oil with any other waste. This could turn the whole load into a hazardous waste.
- ✗ Don't pour used oil on the ground, even for dust suppression.
- ✗ Don't mix used oil with any other waste, such as brake fluid, power steering fluid or antifreeze.
- ✗ Don't mix your used oil or "do-it-yourselfer" used oil with any other waste if you plan to burn it in your shop for heating.

## ◆ IMPORTANT TOPICS ◆

### TESTING ----- ◆

Sometimes sending a sample of waste to a laboratory for analysis is the only way to determine if the waste is hazardous. Important tests for auto body shops typically include those for pH, volatile organics, petroleum hydrocarbons, and heavy metals. If you test a waste once, and continue to use the same industrial process, you may apply those test results when designating future batches of the same waste. For example, if you test your spent paint booth filters once and find them to be non-hazardous, you may use this knowledge for future disposal of this waste. If you need testing done, request Ecology's Hazardous Waste Services Directory or ask your association for help in locating a reputable lab.

### POLLUTION PREVENTION PLANNING REQUIREMENTS ----- ◆

If you generate more than 2,640 pounds of hazardous waste per year (this is an average of 220 lbs/month), you are required to prepare a pollution prevention plan and pay a planning fee. (See page 13 for how to determine the amount of waste you generate.)

For more information, contact your nearest Ecology waste reduction and recycling specialist at: Bellevue (425) 649-7000, Olympia (360) 407-6300, Spokane (509) 456-2926 or Yakima (509) 575-2490.