

Hazardous Waste Preliminary Screening Checklist for Auto Body Shops or Collision Repair Shops

Your regulatory obligations depend on the quantity of hazardous waste you generate in a month (not the amount shipped nor an average) or the quantity you accumulate on site. There are three (3) categories for hazardous waste generators:

Generator Category	Quantity Generated Per Month	Amount Accumulated On Site
Very Small Quantity Generator (VSQG)	No more than 220 lbs. No more than 2.2 lbs. acutely hazardous waste	No more than 2,200 lbs.
Small Quantity Generator (SQG)	Between 220 and 2,200 lbs. No more than 2.2 lbs. acutely hazardous waste	No more than 13,200 lbs.
Large Quantity Generator (LQG)	More than 2,200 lbs.	No limit

The first step in determining your category is to assess all of the **solid wastes** your facility generates to determine if any of these are hazardous. Any material that has been used, and as a result of contamination, can no longer serve the purpose for which it was produced without processing is considered a spent material. Any spent material that is abandoned, recycled or inherently waste-like is considered discarded and therefore a **solid waste**.

When a **solid waste** has been generated, a determination whether it is hazardous must be made unless it can be excluded under 40 CFR 261.4. It can be a listed waste under 40 CFR 261, Subpart D and/or characteristically hazardous based on testing or applying knowledge of the hazardous characteristic of the waste.

This checklist is a list of materials and/or products typically used by your industry that have the potential to be hazardous waste. Your shop may use a material or product not specified on this list that also has the potential to be hazardous waste when discarded. You should review the Safety Data Sheet for each product stored and/or used at the facility.

This checklist does not tell you whether you are complying or how to comply. It is a necessary first step prior to additional steps that may need to be taken such as obtaining an U.S. EPA identification number if you are an SQG.

The following materials when discarded have the potential to be considered hazardous wastes. If you answer yes to any of the following questions, you should review that waste stream and possibly consider testing the waste.

This checklist also asks you to estimate the amount you generate of each waste stream. When doing so, include any of the wastes that are known to be hazardous. If you are uncertain whether a waste is hazardous, you should include it in your estimate as a “worst case scenario” for this exercise.

1. Aerosol cans**yes no**

<i>Aerosol cans may contain products or propellants that would make them a hazardous waste when disposed. If you use solvents or degreasers, please see Sections 4 and 5.</i>		
Do you use aerosol products like paints, degreasers, solvents, or other cleaners?		
Do you dispose of aerosol cans that may contain residual product or propellant?		
How many aerosol cans, that are not significantly empty, do you dispose of in a month? If the contents of the can are not removed, include the weight of the can in your estimate.		

2. Paints (primer, precoat, sealer, topcoat or specialty)**yes no**

Do you generate waste from the use of products that have a flash point less than 140°F?		
Do any of your paints or sealers contain heavy metals (e.g., arsenic, chromium, lead or cadmium)?		
Do any of your paints include a solvent as supplied and/or added as a thinning agent? Refer to Section 4.		
How much of this waste do you generate in a month?		

3. Paint booth filters**yes no**

<i>If booth filters collect overspray which includes a listed hazardous waste, the filters would be hazardous waste (regardless of whether it's dry). See Section 2 regarding paints. Depending on the material used, booth filters might also be a characteristic hazardous waste.</i>		
Do you use products that have a flash point less than 140°F?		
Do you use products that contain a listed solvent? See web links below.		
How much filter waste do you generate in a month?		

4. Solvents, degreasers**yes no**

<i>Some solvents, when used for cleaning or degreasing, are listed hazardous waste. Some of the most common listed solvents are: tetrachloroethylene, trichloroethylene, methylene chloride, xylene, acetone, methyl isobutyl ketone, methanol, toluene, methyl ethyl ketone, isobutanol and benzene.</i>		
Do you use products with a pH of less than 2, or greater than 12.5?		
Do you use products that have a flash point less than 140°F?		
Do you use products that contain a listed solvent? See web links below.		
Do you use solvent on rags or wipes? If yes, see Section 5.		
<i>Solvents that are recycled on-site could be considered hazardous waste before they are recycled, and would have to be included in your monthly generation rate. Still bottoms from recycling or reclaiming spent solvent are often hazardous waste.</i>		
How much solvent waste do you generate in a month? Include solvent that is recycled on- or off-site, and still bottoms.		

5. Shop towels, paper wipes, and absorbent materials**yes no**

Do you use shop towels or paper wipes to clean with solvents or degreasers?		
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<i>If wipes or absorbent materials are used with a listed hazardous waste other than solvents, the towel is then a hazardous waste. Towels or absorbent materials might also be a characteristic hazardous waste – toxicity corrosivity or reactivity.</i>		
Do you dispose of your shop towels as a solid waste?		
How much of this waste do you generate in a month?		
<i>Shop towels that are laundered by a proper commercial or industrial laundering service are not considered a solid waste, and are therefore not a hazardous waste. Shop towels that are used for cleanup of hazardous waste spills are not included in this exemption.</i>		
Do you use cardboard or absorbent materials to contain or collect spills of potentially hazardous materials?		
How much of this waste do you generate in a month?		

6. Other automotive fluids and filters

yes no

<i>Antifreeze, oil, windshield washer fluid,</i>		
Do you dispose of your used oil, rather than recycling it or burning it on-site in an appropriate space heater? (If so, it is subject to full regulation as a solid or hazardous waste.)		
Do you dispose of oil filters that have not been drained?		
Are any of your oil filtersterne plated (these filters are more likely to be used in heavy-duty vehicles and equipment)?		
Do you use types of antifreeze other than propylene glycol or traditional ethylene glycol?		
Do you generate antifreeze from vehicles that have metal radiators or lead-soldered joints?		
Do you dispose of windshield washer fluid that contains alcohols (typically fluids with lower freezing points)?		
Do you allow antifreeze, used oil, or other automotive fluids to be contaminated or mixed with a hazardous waste (e.g., mixing solvents with oil)?		
How much of these wastes do you generate in a month?		

7. Unused, off-spec, expired, or unwanted product

yes no

<i>Many unused products could be considered hazardous waste when disposed. If you have accumulated products that you will not use, you should either recycle or dispose of them. Consider checking a materials exchange to see if someone could use your unwanted products. If you recycle or dispose of unusable product, you must make a proper waste determination. For regulatory purposes, the product became a waste when it ceased being useful.</i>		
Do you have any unusable products with a pH of less than 2, or greater than 12.5?		
Do you have any unusable products with a flash point less than 140°F?		
Do you have any unusable products, e.g. old paint, that may contain solvents or metals?		
How much of this waste do you generate in a month?		
How much unwanted product (that could be considered hazardous waste) do you have on site?		

8. Batteries

yes no

<i>Certain used batteries have the potential to be hazardous waste, unless they are recycled. If you choose to recycle these batteries, they can be managed as Universal Waste.</i>		
Do you have spent lead-acid batteries?		
Do you have used rechargeable batteries or mercury-containing batteries?		

Do you dispose of these items, rather than recycle them?		
How much of this waste do you generate, for disposal, in a month?		

9. Mercury-containing devices

yes no

<i>Certain mercury-containing equipment that would be considered hazardous waste can alternatively be recycled and managed as universal waste.</i>		
Do you have any devices, items, or articles that contain elemental mercury that is integral to their functions? Examples include thermostats, thermometers, barometers, mercury switches, and certain types of meters, regulators, and gauges.		
How much of this waste do you generate, for disposal, in a month?		

10. Fluorescent lamps and other types of lighting

yes no

<i>Spent lamps or bulbs that are considered hazardous waste can alternatively be recycled and managed as Universal Waste. Crushed lamps cannot be managed as universal waste.</i>		
Do you have waste fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, metal halide, or any other type of lamps that contain mercury or other heavy metals?		
Do you intentionally crush or break these lamps?		
Do you send these lamps off-site for disposal (instead of recycling)?		
How much of this waste do you generate, for disposal, in a month? Include crushed lamps, even if they are recycled.		

11. Electronics

yes no

<i>Electronic or “e-waste” is any waste that is, or has, the following component: a circuit board, diode, CRT, computer, or electronic device.</i>		
Do you have electronic waste (e-waste) that is disposed or incinerated?		
How much of this waste do you generate in a month, or have accumulated on-site?		

Total the monthly generation rates of all of your potentially hazardous wastes identified in the above sections. Wastes identified in Sections 8- 11 should be included unless they are recycled (exception: include crushed lamps that are recycled).

If you have unused or unwanted products (Section 7) that will be disposed of, include that amount in your total. This would be considered a “one-time generation”, but it can cause you to be regulated differently for that time period.

If your total is more than 220 pounds, or you feel you have the potential to generate more than 220 pounds of hazardous waste in a month, you will need to be aware of regulations that apply to small and large quantity generators of hazardous waste.

If you are unsure whether a waste may be considered hazardous, or need compliance assistance, you may contact IDEM’s Compliance and Technical Assistance Program (CTAP) at (800) 988-7901 or (317) 232-8172. This program offers free, confidential compliance assistance to Indiana businesses.

U.S. EPA:

Generator summary chart: <http://www.EPA.gov/osw/hazard/generation/summary.htm>

Basic information with additional links: <http://www.EPA.gov/EPAwaste/hazard/index.htm>
Listed hazardous wastes: <http://www.EPA.gov/EPAwaste/hazard/wastetypes/listed.htm>
Information for SQGs: <http://www.EPA.gov/EPAwaste/hazard/generation/sqg/handbook/k01005.pdf>

IDEM:

Hazardous waste: <http://www.in.gov/idem/landquality/2344.htm>

Hazardous Waste Resource page: <http://www.in.gov/idem/landquality/2370.htm>

Compliance and Technical Assistance Program: <http://www.in.gov/idem/4108.htm>