



Automotive Collision Repair Shops

THIS POLICY DOES NOT HAVE THE FORCE OF LAW

Hazardous Waste Program

*The purpose of this guidance is to help operators of automotive repair shops determine what Ohio EPA information they are required to include in their annual operating license registration form for the **Ohio Board of Motor Vehicle Repair**.*

How do I know if I need a hazardous waste ID number?

If you generate more than 220 pounds (approximately ½ of a 55-gallon drum) of hazardous waste per month, you must obtain a **12-digit** hazardous waste ID number (also referred to as a U.S. EPA ID number). This number is different from the air pollution facility ID number discussed later in this guidance.

NOTE: If you generate less than 220 pounds of hazardous waste per month, you do not need a hazardous waste ID number. You can enter **Not required - VSQG** in the EPA Hazardous Waste Generator No. box on the Ohio Board of Motor Vehicle Repair application form.

How do I know if the waste I generate is hazardous waste?

Material that can no longer be used is considered a waste. The hazardous waste rules require you to determine if any of your wastes are hazardous. Your waste may be classified as hazardous if it is:

- A listed hazardous waste; or
- A characteristic hazardous waste.

Any waste that appears on the lists published in Ohio's hazardous waste regulations (**OAC rules 3745-51-31 through 3745-51-33**) is a listed hazardous waste. Waste that does not appear on the lists may still be regulated if it has any of the following four characteristics.

Ignitable — A flash point less than 140° F; can pose a fire hazard; can irritate the skin, eyes, and lungs; and may give off harmful vapors. Gasoline and paint are ignitable.

Corrosive — A pH of less than or equal to (2) or greater than or equal to (12.5). For example, most acids are corrosives that can eat through metal, burn skin on contact, and give off vapors that burn the eyes.

Reactive — A reactive material can explode or create poisonous gas when combined with other chemicals or with water.

Toxic — Toxic substances contain high levels of certain contaminants (such as heavy metals, pesticides, and other chemicals) which can cause illness and even death if swallowed or absorbed through the skin. Contaminated antifreeze, fluorescent lamps and electronic equipment can all be toxic.

If you know enough about the waste you are generating, you can use your knowledge of the waste to determine if it is hazardous. If not, you may have to send a sample of the waste to a laboratory.

How do I know how much hazardous waste is generated at my shop?

You must add the total weight of all the hazardous waste streams (listed and characteristic) generated at your facility each calendar month.

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Why is the amount of hazardous waste I generate per month important?

The more hazardous waste you generate, the more requirements apply to you. If you generate less than 220 pounds of hazardous waste each month, you are a Very Small Quantity Generator (VSQG). VSQGs do not need an EPA hazardous waste ID number but they still must send all hazardous waste to a permitted hazardous waste facility for treatment and disposal.

NOTE: As a VSQG you can write **Not required - VSQG** in the Hazardous Waste Generator No. box on your Ohio Board of Motor Vehicle Repair application form.

If you generate between 220 and 2,200 pounds (or about 27 to 270 gallons) of hazardous waste in one month you are a Small Quantity Generator (SQG). If your facility generates more than 2,200 pounds of hazardous waste in one month you are a Large Quantity Generator (LQG). SQGs and LQGs must obtain a hazardous waste ID number and comply with all applicable hazardous waste rules.

How do I obtain a hazardous waste ID number?

To get a **hazardous waste ID number**, you must send a fully completed, signed copy of **EPA Form 9029** to Ohio EPA. The form is available online on **DERR's Notification of Regulated Waste Activity site** or by contacting Ohio EPA for a hard copy. If you have questions about obtaining a hazardous waste ID number, contact the Information Resource Management Section by phone at (614) 644-2924.

Upon receiving your completed form, Ohio EPA will assign your facility a 12-digit hazardous waste ID number. If your facility was previously assigned a number under another owner, the number will be reactivated with your current information. It may take several weeks for you to get written confirmation of your ID number. If you need confirmation sooner, please put a note in the Comment Section of the form so Ohio EPA can contact you when the number has been issued.

Air Requirements

How do I know if I need an EPA Air Pollution Source Permit number?

If you operate any equipment that requires an air permit, you need an air pollution source permit number. Ohio EPA assigns this 10-digit number to your company if they issue you an air permit or permit-by-rule registration. If your shop does not need an air permit or a permit-by-rule, it does not need an air pollution source permit number. As mentioned previously, this number is different from the 12-digit hazardous waste ID number.

How do I know if I need an air permit?

Examples of equipment that may need an air permit include paint booths, solvent parts washers, and abrasive grinding or blasting operations. However, not all of this equipment automatically needs a permit - it depends on the size of the equipment and the amount of pollutants (emissions) being released. For all your shop's operations, you should look at the following three categories to see where each air pollution source fits:

1. Permit exemptions – two categories:

- *De minimis exemption (OAC rule 3745-15-05)* - If you can demonstrate that the equipment or operation does not emit more than 10 pounds per day of air pollutants or 2000 pounds per year of hazardous air pollutants, it

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is classified as a de minimis source of air pollution and it does not need an air permit. However, you must keep records to prove your emissions remain below 10 pounds per day.

For paint booths, VOCs (volatile organic compounds) are released into the air when painting or cleaning spray guns. You can calculate your daily air emissions by multiplying the amount of paint and solvent you use each day by the corresponding VOC content of the material (see the Material Safety Data Sheet (MSDS) or Environmental Data Sheet (EDS) from your supplier. Your supplier may even have computer software to do this for you).

Examples of equipment that may meet the definition of de minimis include:

- Low-usage paint booths (using about 1.5 gallons or less of total paint and solvent per day);
 - Used oil burners rated less than 500,000 Btu per hour (provided only used oil generated on the premises is burned);
 - Intermittent welding operations.
- *Listed exemption (OAC rule 3745-31-03)* - lists more than 45 types of equipment that are exempt from needing air permits. Examples of exempt equipment include:
 - Solvent recycling units less than 20 gallons capacity;
 - Parts washers having a liquid surface area less than or equal to ten square feet that do not use methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform;
 - Parts washers using water-based detergent cleaners;
 - Grinding, machining, or abrasive blasting operations controlled by an internally-vented dust collector under 4000 CFM;
 - Refrigerant reclaiming and recycling machines.

You do not need to notify Ohio EPA to claim a de minimis or listed exemption. However, for any de minimis claim you must maintain records that demonstrate the operation meets the exemption and actual emissions do not exceed de minimis amounts. If all of your operations fit under the listed exemptions or are de minimis, you will not have an air pollution source permit number.

2. Permit-by-Rule (PBR) – The PBR under OAC rule 3745-31-03 is a streamlined permitting option for auto body refinishing facilities, i.e., collision shops that do not qualify for de minimis or listed exemptions. The PBR functions as both the installation and operating permit for the auto body shop. To be eligible for the PBR, shops must use HVLP or electrostatic spray equipment, have two or fewer spray booths, and have exhaust stacks meeting certain design criteria. The PBR requires you to use good housekeeping practices and to keep annual records of paint and solvent usage. Companies wishing to operate under the auto body refinishing PBR must submit a simple, one-page notification form to their Ohio EPA district office or local air agency (see links below). There is no waiting period (unless you want to convert an existing air permit to PBR) and there is no fee. You must comply with all of the PBR conditions immediately upon installing and operating your shop.

Once Ohio EPA receives and approves your PBR notification, your shop will be assigned a 10-digit air pollution source permit number. If the company can no longer comply with the conditions of the PBR, the company must apply for an air pollution permit. Ohio EPA or your local air agency retains the authority to deny or revoke a company's ability to operate under the PBR if EPA non-compliance is, or becomes, an issue.

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3. Permit-to-Install and Operate (PTIO) - If you cannot use the exemptions or PBR, you must get an air permit. You must apply for and receive your PTIO before installing and operating the equipment. The renewable PTIO allows continued operation and contains your air pollution source permit number. If you do not have a permit but discover through the steps above that you are operating equipment that needs one, you must apply for a PTIO.

What do I enter on the Ohio Board of Motor Vehicle Repair application form on the "EPA Air Pollution Source Permit No." line?

If your facility obtained a PTIO or registered for the PBR, you should already have an air pollution source permit number. The 10-digit number will be listed on the permit or any associated correspondence from the Ohio EPA, Division of Air Pollution Control. If you registered for the PBR, you can find your number by looking it up online or by contacting your Ohio EPA district office or local air agency (see links below).

If your shop is exempt as a de minimis air pollution source, write "de minimis" or "exempt" on the line.

Where can I get more information?

For free assistance with Ohio EPA regulations, you can contact Ohio EPA's *Office of Compliance Assistance and Pollution Prevention* at (800) 329-7518. You may also contact your local Ohio EPA district office or local air agency.

For more information about the topics covered in this guidance, visit these Web sites:

Getting a Hazardous Waste ID Number

Hazardous Waste Generator Handbook

Air Permit Exemption Information

Air Permit-by-Rule Information

Online list of PBR notifications: Click "Active List of Permit by Rule"

Compliance Guide for Auto Body Shops

Ohio EPA district/local air agency office directory for air permitting issues

Contact

For more information, contact the Hazardous Waste Program Compliance Assurance Section with the *Division of Environmental Response and Revitalization* at 614-644-2924.