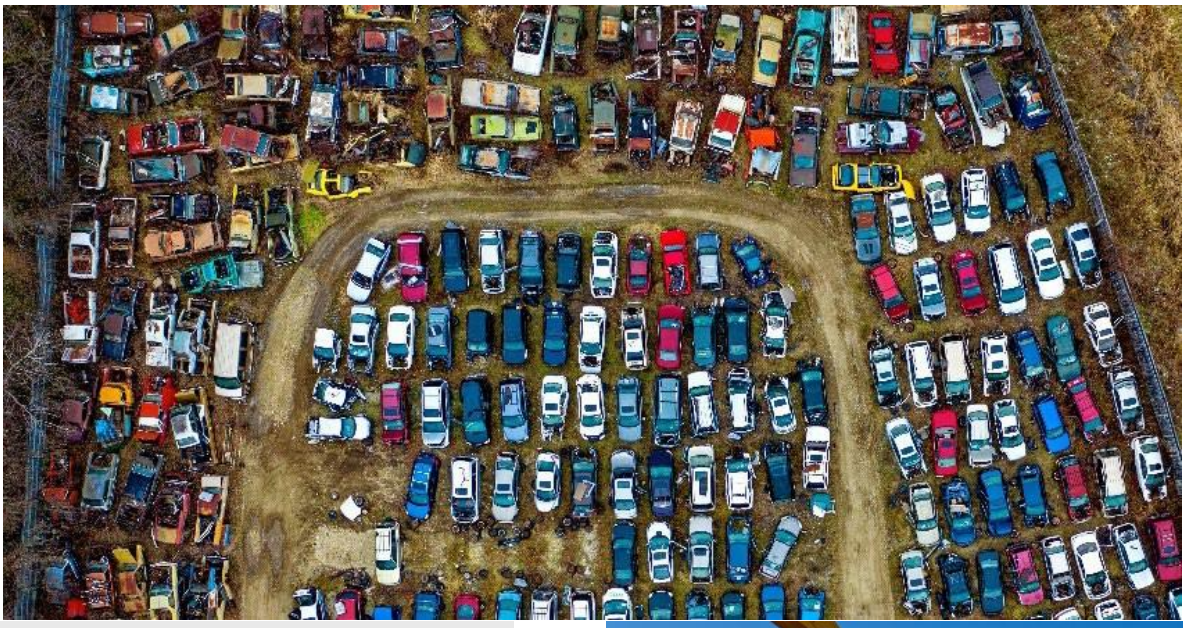
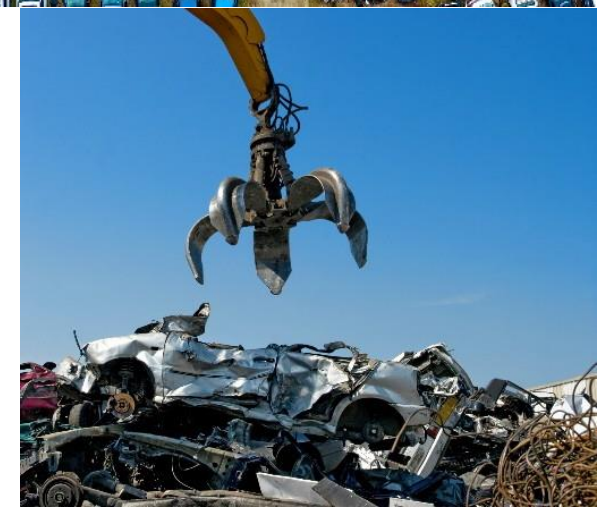
Ohio Environmental Protection Agency

Environmental Compliance Guide for Motor Vehicle Salvage Yards





A guide to help motor vehicle salvage yards understand and comply with Ohio EPA rules, reduce waste, and save money.

Division of Environmental and Financial Assistance (DEFA)
Office of Compliance Assistance and Pollution Prevention (OCAPP)
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Contents

Need help understanding Ohio EPA's environmental regulations?

If you are operating a motor vehicle salvage yard, it is important for you to know the Ohio EPA regulations that may apply to your activities. For example, motor vehicle salvage yards are required to obtain a ***stormwater permit or a no exposure certification***. In addition, you may need permits for air pollution sources or wastewater discharges. You may also be required to notify Ohio EPA if you generate hazardous waste. Complying with some regulations, such as getting a permit, may take some time. So, the earlier you consider and understand your responsibilities under the rules, the better.

Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) is a free and confidential resource to help small businesses comply with environmental regulations and permit requirements. Our environmental specialists can answer your questions regarding air, waste, water, and other EPA regulatory requirements and help find ways to reduce waste and save money. OCAPP provides:

- A toll-free hotline - (800) 329-7518
- Free on-site compliance and pollution prevention assessments
- Help with permit applications and forms
- Assistance with material reuse and recycling
- Environmental workshops and webinars
- Easy-to-understand publications and guidance documents

To keep up to date with any changes in the laws and for updates to this guide, ***visit OCAPP's webpage***.

OCAPP services are free and confidential!

Introduction

This guide is intended to help motor vehicle salvage yards understand the regulatory requirements that may apply to them. This guide summarizes the major areas of compliance – air, waste, and water; however, it does not address every environmental issue or regulation that may apply to your salvage yard. It is intended as a tool to help you evaluate your compliance and should not be used as your only tool for understanding the regulations. A review of Ohio EPA's environmental regulations, other guidance materials and publications is also needed to gain a complete understanding of the requirements.

Using this guide can help your shop:

- Understand applicable environmental regulations
- Improve regulatory compliance
- Reduce pollution
- Conserve resources and save money

What is a motor vehicle salvage yard?

Throughout this guide motor vehicle salvage yards are referred to as salvage yards. A motor vehicle salvage dealer is someone who's primary business is selling salvage motor vehicle parts. Someone who sells retail salvage motor vehicles, manufactures salvage motor vehicles, or sells gradable scrap metal from salvage motor vehicles could also be considered a motor vehicle salvage dealer.

MVSDs obtain licenses through the State of Ohio (BMV) Dealer Licensing Section (***ORC Chapter 4738***). For more information about obtaining this license, please visit the ***Salvage Motor Vehicle Dealer License webpage***. In the context of this guide, a MVSD will be called a salvage yard.

How to use this guide

The guide is divided into sections based on each major regulatory area that may apply to your salvage yard. The guide also contains compliance checklists at the end of each section. The checklists are intended to help you recognize the areas where compliance with the regulations can be improved. The compliance checklists are intended for your internal use only and do not need to be returned to Ohio EPA. You should periodically perform the self-assessments to help your salvage yard remain in compliance. This guide also includes best management practices (BMPs) and pollution prevention tips to help your salvage yard reduce waste and save money. At the end of this guide, you will also find appendices that contain useful reference information.

- ✓ Read the regulatory overview in each section before completing the checklist.
- ✓ Read each checklist question carefully and check the box that applies to your salvage yard. If you are unsure what is being asked, please refer to the discussion of the regulatory area and the additional information in the guide. Completing the checklists will require you to review your salvage yard's practices and operations.
- ✓ Answers selected in a highlighted box may indicate areas of non-compliance or areas where your salvage yard's compliance can be improved. If you identify any areas where your salvage yard is not meeting the regulatory requirements, you should carefully review the applicable section of the guide for information on how to return to compliance. Address any areas of non-compliance as soon as possible.

If you need additional assistance in understanding how to use this guide and complete the checklists, please contact OCAPP at (800) 329-7518.

Air Pollution Requirements

An air pollution source is anything that emits air pollution, such as dust, fumes, gases, mist, smoke, vapors, or odors. Motor vehicle salvage yards may perform activities that are sources of air pollution. In Ohio, air permits are required for all sources of air pollution unless the source is exempt. There are exemptions from air permits that may apply to your salvage yard that are covered later in this section. It is very important that you identify all air pollution sources at your salvage yard and determine if you need an air permit.

Common air emission sources at salvage yards include:

- Welding
- Grinding
- Shot blasting
- Generators
- Torch cutting
- Fuel Storage Tanks
- Crushing and/or shredding equipment
- Solvent cleaning/degreasing (parts washers)
- Shop heaters/furnaces
- Paved and unpaved roadways and parking areas

Does your salvage yard have an air emission source?

Most salvage yards will have sources of air pollution. There are four general rules of thumb that are useful when trying to identify your air pollution sources.

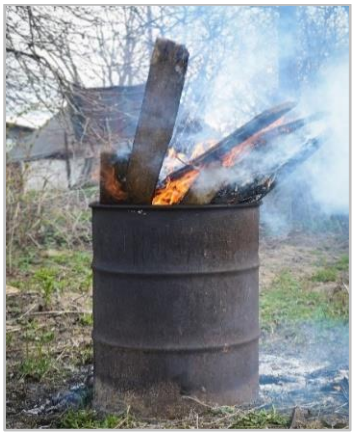
- Something with a stack, dust collector or vent. Examples include shot blasters, grinders and storage tanks.
- A process that uses solvents, adhesives, or other chemicals. Examples include solvent degreasing and cleaning activities (including solvent parts washers), and paint booths.
- Something that burns fuel (for example, oil, natural gas, coal). Examples include boilers, generators, furnaces, and process heaters.
- A process that produces visible dust, smoke, or odors. Examples include roadways, parking areas and material handling areas.

Tips to evaluate whether your salvage yard needs an air permit.

- ✓ Start by identifying all sources of air pollution at your salvage yard.
- ✓ Determine whether any of these sources are exempt.
- ✓ Calculate emissions for all sources that are not exempt.
- ✓ Determine your compliance status.

It is helpful to begin by conducting an inventory of your salvage yard to identify all processes and equipment. Evaluate each piece of equipment and each process at your salvage yard to determine whether that source emits air contaminants. Include all equipment or processes even if they do not directly emit contaminants through a stack or a vent. Evaluate other activities related to the process or equipment. For example, activities such as cleaning with solvents or using a parts degreaser can also be sources of air pollution and need to be included in your inventory. Gather information about each air emission source, including how the equipment is used, maximum capacity, safety data sheets, performance test results and any emissions control equipment. Be as thorough as possible in preparing your salvage yard's inventory.

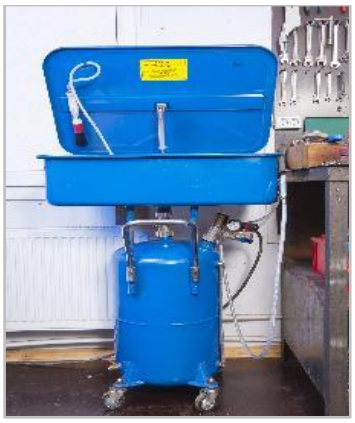
Be aware that just because you have identified your potential sources of air emissions does not necessarily mean that each source will require an air permit. Once you have completed your inventory, you need to evaluate each process/equipment to determine if an air permit is needed. Ohio EPA has many air permitting exemptions that may be applicable to your operations. The guidance provided below can assist you with this process.



*Under Ohio EPA's rules, you **cannot** open burn waste at your salvage yard.*

Is your air emission source exempt from air permitting?

Once you have identified your emission sources, your next question may be "Do I need an air permit for each emission source at my salvage yard?" Activities that involve solvents are regulated and often require air permits because these materials contain volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). But not all sources of air pollution require an air permit. If you have an air emission source that meets certain criteria it may be exempt from air permitting. There are three common scenarios where an air emission source could be exempt from air permitting.



Some equipment, like small parts washers, may be exempt from air permitting.

Source is permanently exempt under Ohio's regulations

Ohio EPA has determined that certain types of equipment and industrial activities do not require air permits. These are called permanent exemptions and include a variety of equipment and operations. In some cases, the source must meet certain criteria (such as specific horsepower, gallons of coating used, storage capacity, etc.) to qualify for the permanent exemption. Some common salvage yard equipment and operations that may be exempt include:

- Small solvent recycling or reclaiming units
- Small solvent cold cleaners or parts washers
- Parts washers and rinse tanks using detergent cleaners
- Grinding and machining operations
- Small coating operations
- Boilers, furnaces, or dryers that meet specific criteria and are under ten million btu
- Diesel fuel storage and dispensing operations
- Maintenance welding operations

Appendix B has information about the complete list of permanent exemptions to help determine if your air emission source is permanently exempt. There are some exceptions, so it is important to read the language carefully and be sure that your source qualifies.

Source has low emissions and is defined as a "de minimis" source under Ohio's regulations

If you have a source that meets a permanent exemption or the de minimis exemption, you are not required to ***notify Ohio EPA or your local air agency***; however, it is important to document your exemption and maintain records that demonstrate how you determined that your actual emissions do not exceed the de minimis thresholds.

In most cases, if an air emission source emits less than 10 pounds per day of air pollutants and less than one ton per year (2,000 pounds) of hazardous air pollutants, then it is considered *de minimis* and does not require an air permit. Whether a unit is de minimis usually depends on factors such as the size of the equipment and type of materials used (for example, low-VOC or water-based coatings).

To determine if a source is de minimis, you must first calculate emissions from the source. Ohio EPA has developed a *de minimis example emission calculation fact sheet* (Appendix E) that explains step-by-step how to calculate your emissions. If you determine you have a de minimis source, you are required to keep paperwork to prove the unit is de minimis. There are additional conditions in the de minimis rule (***OAC Rule 3745-15-05*** in Appendix B) that you are required to comply with.

Source qualifies for a Permit-by-Rule (PBR)

Some equipment and operations qualify for an ***air Permit-by-Rule (PBR)***. If you have a source that qualifies for a PBR, you are not required to go through the formal air permitting process for the source. Rather, you notify Ohio EPA that you would like coverage under the PBR through a simple, one-page notification form. It's important to know that you must demonstrate that your source meets all the qualifying criteria for a PBR. If you do not meet the criteria for a PBR, you must obtain a standard permit-to-install and operate (PTIO) for the source.

When operating under a PBR, you must comply with all the PBR general provisions, including any applicable record keeping and reporting requirements outlined in the PBR rule. It is critical that a salvage yard wanting to operate under a PBR exemption be aware of these requirements.

There are three PBRs that may be applicable to your salvage yard:

- PBR for ***unpaved roadways and parking areas***
- PBR for ***paved roadways and parking areas;***
- PBR for ***back-up, emergency generators***

To determine if your source qualifies for a PBR, begin by reviewing the ***notification forms and instructions***. If your source meets the criteria on the notification forms, complete and submit to your ***district office or local air agency***. For more information see ***Ohio EPA's PBR factsheet***.

How do you obtain an air permit for sources that are not exempt?

If you have a source of air pollution that is not exempt, then an air permit, known as a PTIO, is needed for that source. The PTIO acts as both the permit to install and the permit to operate the emissions source.

If you are already operating your shop and discover that you need an air permit, you must still complete and submit a PTIO application.

To obtain an air permit, you must complete a permit application and submit it to the ***Ohio EPA district office or the local air agency covering your area***. The air permitting process can take some time and you are required to have your air permit before you start operating the air pollution source. Therefore, it is important to start the permit process as early as possible. If you are already operating your salvage yard and discover that you need an air permit, you must still complete and submit the ***PTIO application***.

For some air sources you may be able to qualify for a ***Model General PTIO***. A general permit is the same as a PTIO, but the terms and conditions of the permit have been developed in advance. General permits may entail less permit review and can be issued in 45 days. For more information see ***Ohio EPA's General Permit fact sheet***.

There are three common air sources at salvage yards that may qualify for a Model General PTIO:

- ***Paved and unpaved roadways and parking areas***;
- ***Paved roadways and parking areas***; and
- ***Storage Piles***.

Air permit violations can occur when you do not understand the requirements of your air permit, therefore, it is important to read and understand your air permit requirements.

TIPS to reduce air emissions and improve compliance

- Keep solvent containers closed when not in use.
- Practice good inventory control. Only use what's needed to complete the job.
- Keep parts washers away from heat sources and drafts to prevent evaporation.
- Change solvent only when it loses its cleaning power, not on a schedule or because it looks dirty.
- Use a two-stage cleaning system, using dirty solvent for pre-cleaning, then finish cleaning with clean solvent.
- Clean parts by hand with detergent, instead of using chemicals.
- Routinely inspect equipment washers and parts cleaning machines for leaks.
- Practice good spill prevention. If a spill occurs, clean it up immediately.

Are there reporting requirements that apply to my PTIO?

Your PTIO will require that you submit an annual permit evaluation report (PER) for each of your air emission sources and that you submit a biannual fee emissions report (FER). Ohio EPA will send you the forms along with instructions for completion and where to return. The annual PER summarizes the activity over a 12-month period for each air emissions source including deviations and exceedances. The biannual FER allows you to self-report your total facility air emissions which will be used to determine your air pollution fee. This form also allows you to report changes to facility mailing address, facility name, primary contact person and ownership changes.

Are there any other air rules that could apply to your salvage yard?

Depending on where your salvage yard is located and what specific activities you perform, there may be additional air rules and requirements that apply. It is important to understand all the air rules that could apply to your salvage yard. Please note that applicability of some of these rules depends on the specific operations your salvage yard performs and maybe even where your salvage yard is located. It is important to read these rules carefully, so you can understand if your salvage yard is subject to additional air pollution-related requirements. These additional rules and requirements are summarized below.

Ohio EPA's environmental requirements for gas stations	Gas stations are subject to Ohio EPA's air pollution control requirements. These stations include retail service stations or private facilities where gasoline is dispensed into vehicle fuel tanks and gasoline vapors are released. The two main types of vapor control equipment are known as Stage I and Stage II vapor controls. Stage I vapor control is required on most gasoline dispensing facilities with a few exceptions. Stage II vapor control is required in 16 Ohio counties. For more information, visit Ohio EPA's ***Gasoline Stations webpage.***
Federal requirements for servicing vehicle air conditioning systems	Refrigerant from motor vehicle air conditioners (MVAC) is regulated under the Clean Air Act. U.S. EPA regulates how refrigerant is handled from MVACs. Most of these requirements come from regulations under section 609 of the Clean Air Act (CAA), however CAA sections 608 and 612 also set standards for refrigerant recovery and disposal. Generally, these rules apply to facilities that service motor vehicle air conditioning systems and require ***technician training***, use of approved equipment, safe disposal and recordkeeping to prevent the release of refrigerants during servicing.
Ohio's Vehicle Anti-Tampering Law - For salvage yards involved in repairing, selling, or buying vehicles	Under state law, it is illegal to sell, lease, rent or operate a vehicle in a tampered condition. Removing a pollution control device (e.g. catalytic converter) from a vehicle is illegal **unless the vehicle is used as a parts car**. Likewise, selling or installing a device that would hamper the effectiveness of any vehicle pollution control system is prohibited. Tampering includes permanently removing, bypassing, defeating or rendering inoperative, in whole or in part, any emission control system from its original design.

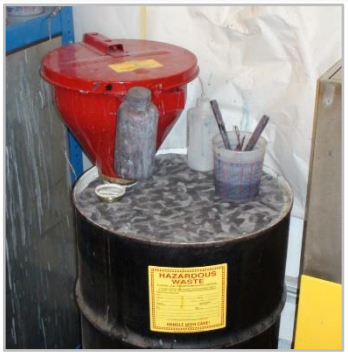
Air Pollution Requirements Self-Assessment Check

Any shaded areas indicate the need for further assessment or identifies a potential compliance area that should be addressed. Need help determining your compliance with regulations or determining your next steps? Contact OCAPP at (800) 329-7518 for free and confidential assistance.

Self-Assessment Check – Air Requirements		
1) Have you completed an inventory of all equipment and processes at your salvage yard that could produce air pollution (for example, something with a stack, vent, dust collector, solvents)?	☐ Yes	☐ No
If you have air emission sources, have you evaluated the following:		
2) Do you have an air emission source that is permanently exempt?	☐ Yes	☐ No
3) Do you have air emission sources that meet a PBR exemption?	☐ Yes	☐ No
a) If yes to question 3, have you notified Ohio EPA of all your PBR-exempted sources?	☐ Yes	☐ No
4) Do you have emission sources that meet the de minimis exemption?	☐ Yes	☐ No
a) If yes to question 4, do you have the required paperwork to demonstrate the sources are de minimis, including emission calculations?	☐ Yes	☐ No
5) If you have air sources that are not exempt, de minimis or qualify for a PBR, have you submitted an air permit (PTIO) application?	☐ Yes	☐ No
6) Have you evaluated other Ohio EPA and federal air rules that may apply to your salvage yard?	☐ Yes	☐ No
7) Do you burn waste (for example, trash, pallets, cardboard)?	☐ Yes	☐ No
8) Do you remove motor vehicle air conditioning (MVAC) refrigerants?	☐ Yes	☐ No
a) If yes to question 8, are you in compliance with U.S. EPA's regulatory requirements for MVAC system servicing? ***Note**: Any person who repairs or services a MVAC system must be properly trained and certified under **section 609** of the Clean Air Act by an EPA-approved program.*	☐ Yes	☐ No
9) Do you dispense gasoline into vehicle fuel tanks?	☐ Yes	☐ No
a) If yes to question 9, are you following the proper Ohio EPA vapor control equipment requirements?	☐ Yes	☐ No
10) Do you remove pollution control devices from vehicles only used for parts cars?	☐ Yes	☐ No

Waste Management Requirements

If you have a material that you are going to dispose of, it is considered a waste. You must evaluate each waste to determine whether it is considered hazardous waste. If it is hazardous, you need to ensure proper on-site and off-site management of this waste at a permitted treatment storage or disposal (TSD) facility.



Wastes from painting and solvent-based cleaning are often hazardous.

What wastes does your salvage yard generate?

To determine if your salvage yard is in compliance, start by conducting a detailed inventory of the wastes produced at your salvage yard.

Some wastes you generate will be classified as solid waste, including materials such as trash, cardboard, scrap metal and tires. Other wastes will meet the definition of hazardous waste under Ohio EPA's rules. All wastes must be properly managed and disposed of, either under the solid or hazardous waste rules.

Common salvage yard wastes that may be considered hazardous include:

- Spent solvents, brake cleaners and penetrating fluids
- ***Rags/wipes*** (reusable or disposable)
- Parts washer fluids and filters
- ***Waste aerosol cans***
- ***Spent light bulbs (lamps)***
- ***Used antifreeze***
- Batteries
- Lead weights
- Mercury switches
- Air bag inflators and modules
- ***Used oil*** and oil filters
- Fuel

What rules do you have to follow to properly manage and dispose of your waste?

Universal Waste

There are specific hazardous waste streams that your salvage yard can choose to manage in an alternative manner in place of more complex hazardous waste requirements. Wastes such as aerosol cans, antifreeze, mercury-containing equipment, light bulbs (lamps), batteries (from vehicles, computers, cells phones and power tools) can be managed under reduced requirements known as the ***universal waste rules.*** Currently, Ohio has two additional types that are Ohio-specific universal wastes that may be managed under these reduced requirements: Antifreeze and paint and paint-related waste. The advantages of handling these hazardous wastes under the universal waste rules include:

- Waste does not need to be evaluated
- Not counting them toward your monthly hazardous waste generation rate
- Increased on-site storage time (up to one year)
- Decreased on-site management
- No hazardous waste manifesting required
- No hazardous waste transporter required

Hazardous waste

If you have ***evaluated your waste*** and determined that it is hazardous, your salvage yard is considered a hazardous waste generator. Ohio has three hazardous waste generator categories: very small quantity generator (VSQG); small quantity generator (SQG); and large quantity generator (LQG). The specific rules you must follow depend on which hazardous waste generator category your salvage yard falls under. The category that your salvage yard falls under depends on the total weight of hazardous waste generated (produced) in any given month of the calendar year. For VSQGs and SQGs, your generator category is also determined by the amount of hazardous waste you accumulate on-site.

Most salvage yards are VSQGs. The regulations that apply vary by the hazardous waste generator category that applies to a salvage yard. The smaller the category, the fewer the requirements that apply. The ***hazardous waste generator requirements summary table*** provides a good summary of the general requirements in each hazardous waste generator category. The U.S. EPA guidance document ***Managing your Hazardous Waste: A Guide for Small Businesses*** provides a good summary of the general requirements in each hazardous waste generator category as well.

If your salvage yard generates more than 220 pounds (roughly half of a 55-gallon drum) of hazardous waste in any given month, you must obtain a U.S. EPA identification number from Ohio EPA by submitting a ***Notice of Regulated Waste Activity Form***. There is no fee for the identification number and if you need help completing the notification form, ***contact OCAPP for free and confidential assistance***. All hazardous waste must be sent to a ***permitted hazardous waste facility for treatment and/or disposal***. It is also acceptable under the rules for some hazardous waste to be sent off-site for recycling.

Hazardous Waste Generator Categories			
	VSQG	**SQG**	**LQG**
Generation per Month	No more than 220 pounds (roughly half of a 55-gallon drum). 	More than 220 and less than 2,200 pounds (between roughly half of a 55-gallon drum and five 55-gallon drums). 	More than 2,200 pounds (more than roughly five, 55-gallon drums). 
Total Accumulation On-site	Never accumulate more than 2,200 pounds (more than roughly five, 55-gallon drums) on-site at any given time.	Accumulate more than 2,200 and less than 13,200 pounds (between roughly five and 30 55-gallon drums) on-site at any given time.	No quantity limit but there is a 90-day accumulation time limit.

How should you manage and dispose of wastes generated at your salvage yard?

The following section and tables provide details on the management and disposal requirements for the most common wastes generated at salvage yards, including solid (non-hazardous) and hazardous wastes.

Common Waste Generated from Motor Vehicle Salvage Yards			
Waste	**Waste Type/Description**	**Management Options**	**Improve Compliance and Reduce Waste**
Aerosol cans	Can be hazardous if the contents are not properly emptied. Includes containers that are a non-refillable receptacle containing a gas compressed, liquefied, or dissolved under pressure, the sole purpose of which is to expel a liquid, paste, or powder and fitted with a self-closing release device allowing the contents to be ejected by the gas.	• Empty the can and manage the contents as a hazardous waste and recycle the can as scrap metal. • Manage as a ***universal waste*** and send non-empty aerosol cans to another universal waste handler's location where they may remove the contents from the can. • Send the non-empty aerosol can to a ***permitted hazardous waste facility*** for disposal.	Purchase fluids in bulk and use refillable bottles in place of aerosol cans when possible.
Air Bag Inflators and Modules	Can be a hazardous waste if are under a court ordered recall and/or non-usable and destined for disposal.	• Airbag inflators and modules installed in motor vehicles and not subject to a court ordered ***recall*** are ***not subject to hazardous waste regulation*** when they are shredded as part of a motor vehicle. • Airbag inflators and modules not subject to ***recall***, when removed from motor vehicles and reused, are ***considered commercial chemical products not subject to waste regulation***. • Airbag inflators and modules removed from automobiles and destined for disposal are a hazardous waste that can cause serious physical injury. They must be managed to meet any court ordered ***recall*** order and the ***hazardous waste regulations*** or the ***Interim Final Rule for Safe Management of Recalled Airbags***.	Handle safely. Reuse/sell as a commercial product.
Antifreeze	Can be hazardous waste depending on concentration of certain metals or if mixed with hazardous waste. Includes propylene glycol or ethylene glycol and used as heat transfer in engine radiators, HVAC units, electronics, and overwintering equipment.	• If hazardous waste, manage as a ***universal waste*** and ***recycle on-site*** or at another universal waste handler's location (for example, antifreeze recycler). This universal waste may also be sent to a ***permitted hazardous waste facility*** for disposal or fuel blending. • If non-hazardous, recycle on-site or send to an ***antifreeze recycler***.	Have good housekeeping practices to minimize spills and leaks.

Common Waste Generated from Motor Vehicle Salvage Yards			
Waste	**Waste Type/Description**	**Management Options**	**Improve Compliance and Reduce Waste**
Batteries	Usually hazardous if rechargeable or if they are lead-acid batteries. Includes all types of batteries including lead-acid.	• Spent lead acid batteries can be managed under Ohio EPA's ***lead acid battery rule*** or as a ***universal waste***.	Reduce types of batteries used on shop floor to promote more efficient use on different equipment.
Empty containers	Can be hazardous depending on the nature of the original contents of container and if not properly emptied. Empty containers such as paint cans, plastic paint mixing cups, cans of thinner and spent aerosol cans could contain residual material that meet the definition of a hazardous waste when disposed.	• Container may be subject to hazardous waste rules unless it meets the definition of ***"RCRA empty"***. • Aerosol cans whether empty or not can be handled as a ***universal waste***.	Label all materials and wastes. Keep tight-fitting lids on containers except when adding or removing material or waste.
Light bulbs (Lamps)	Can be hazardous waste depending on levels of mercury or other toxic metals. Includes incandescent, high-pressure sodium, fluorescent, high-intensity discharge, neon, metal halide, LED, etc.	• If hazardous waste, can be managed as ***universal waste*** and sent to another universal waste handler or to a ***permitted hazardous waste facility***.	Check to see if your local utility offers rebates for lighting and energy efficiency upgrades.
Mercury Switches	A hazardous waste due to mercury content (D009).	• Manage as a ***universal waste*** and send to a recycler or to a ***permitted hazardous waste facility*** for disposal. • Through July 1, 2027, ***End of Life Vehicle Solutions*** *[*877-225-ELVS (3587)] provides **free collection buckets** and **free services** to manage automotive switches once they are removed from vehicles. These services cover all transportation and final disposal costs of any collected switches.	Do not place mercury switches in trash. Take care to not break open capsule to minimize spills, cleanup, and disposal costs.
Refrigerant	Refrigerant from motor vehicle air conditioners (MVAC) is regulated under the Clean Air Act. U.S. EPA regulates how refrigerant is handled from MVACs. Most of these requirements come from regulations under section 609 of the Clean Air Act (CAA), however CAA sections 608 and 612 also set standards for refrigerant recovery and disposal.	• Any person who repairs or services a MVAC system must be properly ***trained and certified*** under section 609 of the Clean Air Act by a U.S. EPA-approved program. • ***Refrigerant recovered*** from vehicles must either be sent off-site to a reclamation facility or recycled on-site.	Keep waste streams separate for reuse, recycling, or treatment. Keep non-hazardous materials from becoming contaminated.

Common Waste Generated from Motor Vehicle Salvage Yards			
Waste	**Waste Type/Description**	**Management Options**	**Improve Compliance and Reduce Waste**
Scrap tires	Non-hazardous solid waste. Tires that are removed from vehicles (both those on and off rims) are defined as scrap tires. A tire that is still on a vehicle is not considered a scrap tire.	• Store in a single area no more than 2,500 sq feet & no more than 8 feet high. • Scrap tires stored outside must be kept free of water, covered or sprayed for ***mosquitoes***. • Most salvage yards that generate scrap tires do not have to become registered and licensed as a scrap tire facility if you meet ***certain requirements***. • Dispose only at ***approved Ohio EPA facilities***. • When shipped off-site, you must use a ***transporter that is registered by Ohio EPA***. • Shipping papers & mosquito control records must be completed and kept for three years. • Self-transporting to a disposal facility may require ***registration as a scrap tire transporter***.	Remove tires often. Do not allow large piles to accumulate.
Spent solvents	Likely hazardous due to ignitability and/or chemical constituents. Includes all types of solvents used for cleaning and degreasing.	• If contaminated with paint, manage as a ***universal waste*** and may be sent to another universal waste handler for storage. This universal waste may also be sent to a ***permitted hazardous waste facility*** for recycling and/or proper management. • If not contaminated with paint, manage under the ***hazardous waste generator requirements*** and send to ***permitted hazardous waste facility*** or recycle on-site in a distillation unit.	Substitute less toxic or nontoxic solvent alternatives whenever possible. Options include terpenes, citric acid-based cleaners, microbial cleaners or aqueous or water-based cleaners.
Solvent contaminated wipes/rags	Can be hazardous depending on the solvent used. Includes wipes and rags that are contaminated with solvents.	• If contaminated only with an F-listed or ignitable solvent, wipes sent to a laundry facility for reuse may be managed under the ***solvent-contaminated wipe exclusion and/or the laundered textile exemption.*** • If contaminated only with an F-listed or ignitable solvent, except trichloroethylene (TCE), they may be disposed in the regular trash and are not considered hazardous waste as long as the conditions of the solvent-contaminated wipe exclusion and/or the laundered textile exemption are followed.	Clean only the parts that need to be cleaned for the repair.

Common Waste Generated from Motor Vehicle Salvage Yards			
Waste	**Waste Type/Description**	**Management Options**	**Improve Compliance and Reduce Waste**
Used oil	Used oil from your salvage yard is subject to Ohio EPA's used oil rules. Examples of used oil include engine oil, lubricating oil, metal cutting fluids, brake fluid, transmission fluid and hydraulic fluid.	• Label used oil containers with the words "Used Oil" and send to a ***used oil recycling company***, or use as fuel in your used oil space heater. • Do ***not*** send to another garage for use as fuel in a used oil space heater or if you take/purchase used oil from another generator, unless you or the generator are a marketer. A marketer is someone who confirms that the used oil is ***on specification*** per the used oil rules. Make sure you also follow the ***used oil space heaters rules.***	Keep material storage areas clean and dry. Regularly inspect storage areas for leaks and spills.
Used oil filters	Non-hazardous if they are non-tern plated and handled correctly. Includes all sizes of heavy duty and light-duty vehicle used oil filters.	• Light-duty vehicle oil filters can be recycled as scrap metal or disposed of in the trash if properly ***hot-drained***. Hot-draining means that you remove and drain the filter at close to engine temperature. Three different methods of hot-draining used oil filters are acceptable. • Heavy-duty vehicle oil filters can be recycled as scrap metal if properly hot-drained. Otherwise, they will need to be evaluated to determine if they are hazardous and managed accordingly.	Train employees on best management practices to reduce waste.

Waste Management Requirements Self-Assessment Check

Any shaded areas indicate the need for further assessment or identifies a potential compliance area that should be addressed. Need help determining your compliance with regulations or determining your next steps? Contact OCAPP at (800) 329-7518 for free and confidential assistance.

Self-Assessment Check – Waste Management Requirements		
Hazardous Waste		
1) Have you evaluated all your waste streams to determine whether any of your wastes are hazardous waste?	☐ Yes	☐ No
2) For potentially hazardous waste streams, do you have information kept on-site that clearly demonstrates the waste is not hazardous waste?	☐ Yes	☐ No
3) Are all hazardous wastes sent to an Ohio EPA-permitted treatment, storage and disposal facility or recycling company?	☐ Yes	☐ No
4) Do you know how much hazardous waste you generate in a month?	☐ Yes	☐ No
5) If you generate more than 220 lbs. (roughly ½ of a 55-gallon drum) of hazardous waste in any month, have you obtained a generator identification number from Ohio EPA?	☐ Yes	☐ No
6) Are you in compliance with Ohio EPA's hazardous waste generator requirements for your generator category?	☐ Yes	☐ No
Aerosol cans		
1) Are your aerosol cans properly emptied and the collected contents properly evaluated?	☐ Yes	☐ No
2) If your aerosol cans are hazardous because they are not emptied, are you managing them as a universal waste and sending to another handler for reclamation or storage, or sending them to a permitted hazardous waste facility for recycling or disposal?	☐ Yes	☐ No

Self-Assessment Check – Waste Management Requirements		
Air Bags and Inflators and Modules		
1) Are airbags listed under a court-ordered recall?	☐ Yes	☐ No
2) Will you dispose of your air bags?	☐ Yes	☐ No
Antifreeze		
1) Have you evaluated your antifreeze to determine if it is hazardous?	☐ Yes	☐ No
2) If your antifreeze is hazardous, are you managing it as a universal waste and reclaiming the antifreeze or sending to another universal waste handler for recycling or storage?	☐ Yes	☐ No
3) If no to question 2, do you send your universal waste antifreeze to a permitted hazardous waste facility for recycling, disposal, or fuel blending?	☐ Yes	☐ No
4) Do you put antifreeze into the sewer or septic system? Have you obtained permissions from your POTW?	☐ Yes	☐ No
5) Do you dump antifreeze on the ground or put it into your trash?	☐ Yes	☐ No
Batteries		
1) Are your batteries stored on-site in a manner that prevents leaks or spills?	☐ Yes	☐ No
2) Do you send lead acid batteries off-site to a recycling company?	☐ Yes	☐ No
3) If you are handling your spent batteries as universal waste, are you in compliance with the universal waste rules?	☐ Yes	☐ No
Empty containers		
1) Do your empty containers meet the definition of "RCRA empty"?	☐ Yes	☐ No
a) If no to question 1, are you managing (aerosol cans only) as a universal waste and sending to another universal waste handler or a permitted hazardous waste facility?	☐ Yes	☐ No
Light bulbs (Lamps)		
1) Are you throwing your light bulbs in the trash?	☐ Yes	☐ No
a) If yes, do you have documentation that your bulbs are non-hazardous, such as up-to-date testing data from the manufacturer or results from lab testing?	☐ Yes	☐ No
2) If you manage your light bulbs as universal waste, are you in compliance with the universal waste rules?		☐ No
Mercury Switches		
1) Have you removed all mercury switches from vehicles?	☐ Yes	☐ No
2) Are all capsules removed intact and are you managing the switch in a manner to prevent a mercury release?	☐ Yes	☐ No
3) Are you sending the mercury switch to a legitimate mercury recycler or permitted hazardous waste disposal facility?	☐ Yes	☐ No
4) Are you in compliance with the universal waste rules?	☐ Yes	☐ No
Refrigerant		
1) Do you remove motor vehicle air conditioning (MVAC) refrigerants?	☐ Yes	☐ No
a) If yes to question 1, are you in compliance with U.S. EPA's regulatory requirements for MVAC system servicing? ***Note**: Any person who repairs or services a MVAC system must be properly trained and certified under **section 609** of the Clean Air Act by an EPA-approved program.*	☐ Yes	☐ No
2) Do you send recovered refrigerant off-site to be reclaimed or recycle on-site?	☐ Yes	☐ No
Scrap tires (If you remove tires from vehicles)		
1) Do you collect the spent wheel weights and recycle them as scrap metal?	☐ Yes	☐ No
2) Do you store scrap tires outside?	☐ Yes	☐ No
3) Are you storing scrap tires in an area greater than 2,500 square feet and are they taller than 8 feet?	☐ Yes	☐ No
4) Do you provide mosquito control for outdoor piles?	☐ Yes	☐ No
a) If providing a pesticide for mosquito control, are you collecting the proper information and maintaining records for at least 3 years?	☐ Yes	☐ No
5) Do you protect tires from sources of ignition?	☐ Yes	☐ No
6) If you transport scrap tires, have you determined whether you need to register with Ohio EPA as a transporter?	☐ Yes	☐ No

Self-Assessment Check – Waste Management Requirements		
7) Do you make sure that scrap tire shipping papers are kept on-site?	☐ Yes	☐ No
Spent solvents		
1) Have you evaluated your spent solvents to determine if it is hazardous?	☐ Yes	☐ No
2) If your spent solvent is contaminated with paint, are you properly managing as a universal waste and sending to another handler or sending to a permitted hazardous waste facility for disposal?	☐ Yes	☐ No
3) If your spent solvent is not contaminated with paint, are you properly managing as a hazardous waste and sending to a permitted hazardous waste facility?	☐ Yes	☐ No
Solvent contaminated wipes and rags		
1) If you generate solvent contaminated rags or wipes:		
a) Have you evaluated them to determine if they are hazardous or are you managing them under the ***solvent-contaminated wipe exclusion***?	☐ Yes	☐ No
b) If you are managing your solvent contaminated rags/wipes under the solvent-contaminated wipe exclusion, are you complying with the management and recordkeeping requirements?	☐ Yes	☐ No
c) If you are not managing your solvent contaminated rags/wipes under the solvent-contaminated wipe exclusion, are you complying with Ohio EPA's hazardous waste regulations?	☐ Yes	☐ No
Used oil and used oil filters		
1) If you remove used oil from vehicles:		
a) Are your used oil storage containers or tanks in good condition?	☐ Yes	☐ No
b) Are storage containers or tanks labeled with the words "used oil"?	☐ Yes	☐ No
c) If sent for off-site recycling, does your used oil transporter have an EPA identification number?	☐ Yes	☐ No
d) Is used oil dumped on the ground or put on the ground to control dust on your property?	☐ Yes	☐ No
e) Is used oil thrown away in your trash?	☐ Yes	☐ No
f) Do you prevent the mixing of used oil with hazardous waste?	☐ Yes	☐ No
2) If you remove non-tern plated oil filters from vehicles:		
a) Is used oil removed from filters before they are recycled or disposed?	☐ Yes	☐ No
b) Are you following Ohio EPA's ***guidelines for hot draining oil filters***?	☐ Yes	☐ No
3) If you burn your used oil in a space heater:		
a) Is the capacity of your space heater less than 500,000 BTUs per hour?	☐ Yes	☐ No
b) Is your space heater vented outside the building?	☐ Yes	☐ No
c) Do you accept used oil from other businesses and burn it in your space heater?	☐ Yes	☐ No
d) Did you or the used oil provider act as a marketer of used oil to demonstrate the used oil is on specification?	☐ Yes	☐ No
e) Do you keep records of how much used oil you burn in your space heater?	☐ Yes	☐ No

Wastewater Discharge Requirements

Sanitary wastewater

If your salvage yard has a restroom, break area with sinks, laundry etc., then you generate sanitary wastewater. One option for managing sanitary wastes includes discharging to a sanitary sewer that leads to a public wastewater treatment plant – or POTW (publicly owned treatment works). Sanitary wastes can also be discharged to an on-site sanitary waste treatment system, such as a septic system.

If you need to construct or make any modifications to an on-site sanitary waste treatment system (septic tank and leach field), this activity requires a permit-to-install (PTI) from Ohio EPA. In addition, if there is a discharge from the treatment system to surface water (for example, a stream, river, lake, etc.), a discharge permit, called an NPDES (National Pollution Discharge Elimination System Permit), is required from Ohio EPA.

Industrial wastewater

Your salvage yard may also generate wastewater from equipment cleaning, washing vehicles, mopping floors or other sources. This is known as industrial or process wastewater.

TIPS to reduce wastewater discharges and improve compliance

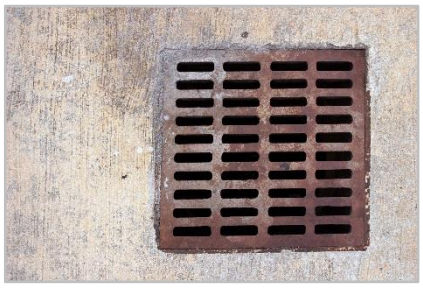
- Keep your shop and maintenance areas clean. Prevent spills and leaks that may add contaminants to floor rinse waters.
- Check all your floor drains and make sure you know where they drain.
- Consider washing vehicles at a local carwash whose discharge is regulated by Ohio EPA or your local POTW.
- Inspect hoses and hose bibs regularly to identify any leaks.
- Keep good records of your shop's wastewater generation and discharge structures.
- Perform maintenance as required to prevent spills and generating wastewater.
- Consider posting signs prohibiting the discharge of industrial chemicals or industrial wastewater to bathroom sinks, kitchen sinks, toilets, or other non-industrial drainage structures.

You **cannot** discharge industrial wastewater directly:

- To storm sewers or storm drains
- To a drain or sewer system if you do not know where it leads
- Outside of your building or on the ground
- To a ditch, creek, river, or other water body without a permit from Ohio EPA

Discharges to a public wastewater treatment plant

Some industrial wastewater discharges go directly to a local POTW. This type of discharge is known as an indirect discharge. Often, POTWs are responsible for regulating the companies that discharge wastewater to them. A large POTW may be able to handle the industrial wastewater from your salvage yard. However, even large wastewater treatment plants are not generally designed to handle industrial wastes like chemicals, metals, oils, etc.



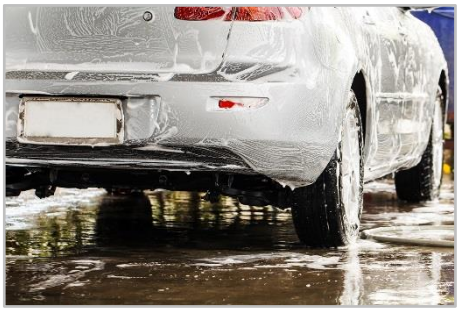
Label floor drains and consider having them capped or plugged if not in use.

If you are discharging to a POTW, you need to contact the plant directly to discuss your activities. You may need a permit for the discharge. In addition, your POTW may require you to treat the wastewater before discharging (for example, oil/water separation, removing solids, chemicals, etc.). If the POTW requires you to install a pre-treatment system, holding tank or other wastewater collection, storage, or treatment unit, a PTI will be needed from Ohio EPA's Division of Surface Water. More information about Ohio EPA's PTI program can be found on the Division of Surface Water's ***wastewater PTI webpage*** and in the appendix.

If your floor drains discharge to waters of the state, you must stop these discharges and obtain a permit from Ohio EPA or find another way to manage your wastewater.

Specific Wastewater Considerations

Shop and maintenance buildings at salvage yards often have floor drains which, if improperly used, can contaminate nearby surface waters or ground waters. If your floor drains discharge to a POTW, you must contact and discuss your activities with them in case you need a permit from the POTW for the discharge. For additional information, refer to the *Discharges to a public wastewater treatment plant* section above or Ohio EPA's ***Do you know where your floor drains go?*** fact sheet.



*Vehicle, engine, or parts wash water from your salvage yard is industrial wastewater and **cannot** be discharged on-site without a permit from Ohio EPA. Even when using biodegradable soaps or detergents, your wastewater is still defined as an industrial wastewater and must be properly managed.*

Additionally, salvage yards may perform vehicle, engine, or parts washing as part of their operations. Wastewater from washing these items can contain contaminants like detergents, oils, dirt, metals, solvents, or other chemicals and is considered industrial wastewater. Options for handling these wash waters from your salvage yard include:

- Obtaining permission to discharge the wastewater to a POTW through a sanitary sewer
- Collecting the wastewater from the job site and arrange for disposal at a POTW or industrial waste disposal facility
- Obtaining a permit from Ohio EPA to discharge the wash water on your site (to a creek, river or other water body)

For more information about options for managing wash water, please refer to Ohio EPA's ***Mobile Power Washing and Environmental Regulations*** fact sheet.

Wastewater Discharge Requirements Self-Assessment Check

Any shaded areas indicate the need for further assessment or identifies a potential compliance area that should be addressed. Need help determining your compliance with regulations or determining your next steps? Contact OCAPP at (800) 329-7518 for free and confidential assistance.

Self-Assessment Check – Wastewater Discharge Requirements		
1) Does your salvage yard generate industrial wastewater?	☐ Yes	☐ No
2) Do you know where your wastewater and floor drain discharges go?	☐ Yes	☐ No
3) If your wastewater goes to a creek, river or other water of the state, do you have an NPDES permit from Ohio EPA?	☐ Yes	☐ No
4) If your wastewater goes to a POTW, do you have permission or a permit for the discharge?	☐ Yes	☐ No
5) Does your process wastewater go to a dry well, cesspool, septic tank or leach field?	☐ Yes	☐ No
6) Does your wastewater go to a storm drain?	☐ Yes	☐ No
7) Do you discharge wastewater outside on the ground?	☐ Yes	☐ No
8) If your salvage yard has its own on-site septic system for discharges from restroom sinks, toilets etc.:		
a) Has your septic system been approved and permitted by Ohio EPA?	☐ Yes	☐ No
b) Do you make sure that only sanitary wastewater from restrooms and sinks is sent to the septic system (no process wastewater or chemicals)?	☐ Yes	☐ No

Stormwater Requirements

Stormwater runoff is rainwater and snow melt that runs off the land and enters streams, rivers, and lakes. Runoff from outdoor production activities or material storage areas may contain a variety of pollutants that can degrade the quality of waters of our state and pose threats to human health. You can do your part to protect our waters by taking steps to prevent stormwater pollution.

General Industrial Stormwater Permit

Businesses that have certain ***Standard Industrial Classification (SIC) codes*** are subject to the stormwater regulations. Recycling facilities including scrap yards, battery reclaimers and salvage yards are included on this list of regulated facilities. Automobile salvage yards have a ***SIC Code of 5015***.

To protect our water resources, salvage yards must obtain a National Pollutant Discharge Elimination System (NPDES) stormwater permit and develop a Stormwater Pollution Prevention Plan (SWPPP).

SWPPP

Your SWPPP identifies ***potential sources of pollution*** that may affect the quality of stormwater discharges at your salvage yard. The plan also describes and ensures the implementation of ***best management practices (BMPs),*** which reduce the pollutants in your stormwater discharges. You must develop your SWPPP including the SWPPP site map prior to applying for your stormwater permit. The SWPPP generally is not submitted to Ohio EPA (though some inspectors may request it). Your SWPPP is a dynamic document which you keep onsite to assist you in complying with your stormwater permit.

Pollutants, materials, and areas to identify in your SWPPP include:

- Fuels
- Solvents
- Used oil/lubricants/machining fluids
- Antifreeze/coolants
- Cleaners
- Chemicals
- Parts
- Scrap materials
- Wastes
- Storage areas (wastes, parts, scrap, etc.)
- Dust
- Production areas (disassembly areas, crushing areas, etc.)

TIPS to reduce stormwater discharges and improve compliance

- Conduct visual inspections.
- Practice good housekeeping.
- Remove all fluids from vehicles prior to storage onsite.
- Generously use drip pans in collection & storage areas.
- Store materials & parts indoors or if outdoors place under cover.
- Have proper spill protection (spill containment devices, absorbent materials, etc.) around car crushing equipment and other areas where spills may be likely.
- Do preventive maintenance. Routinely inspect equipment for leaks.
- Practice good spill prevention & response. If a spill occurs, clean it up immediately.
- Retain recycling/disposal records for fluids (used oil, fuel, antifreeze, etc.)
- Ensure no fluids are discharged or released onto the ground, into storm drains, into septic systems or waterways.

For resources to assist you in developing your SWPPP, see ***Ohio EPA's Industrial General Permit Stormwater website*** and ***Preparing a SWP3 webinar.***

Are there requirements that apply to my stormwater permit?

Yes, your stormwater permit includes record keeping, spill reporting and monitoring requirements. Your stormwater permit will require ***documented*** quarterly stormwater visual inspections, ***documented*** routine facility inspections (monthly or quarterly), an ***annual report*** and quarterly benchmark sampling of stormwater which will require laboratory analysis. Make sure to read your stormwater permit carefully so you fully understand your compliance requirements.

Are there reporting requirements that apply to my stormwater permit?

Yes. You will need to report the results from your quarterly benchmark sampling to Ohio EPA through ***Ohio EPA's Electronic Discharge Monitoring Reporting (eDMR) system*** via ***Ohio EPA's eBusiness Center***. Utilizing ***Ohio EPA's eBusiness Center*** will require obtaining an ***eBusiness Center account.*** For resources to assist you with reporting your eDMRs, see ***Ohio EPA's eDMR website*** and ***How to Activate & Enter a Report in Ohio EPA's eDMR System***.

No exposure certification

If raw materials, engines and parts, wastes, etc. are managed in ways that prevent exposure to stormwater (e.g. activities and parts under a roof), you may qualify for an Industrial ***no exposure certification*** and therefore not require an NPDES permit.

As a motor vehicle salvage yard, you are **required** to obtain either a stormwater permit or a no exposure certification.

How do you obtain a stormwater permit or a no exposure certification?

Applying for the General Industrial Stormwater permit or a no exposure certification must be done through ***Ohio EPA's eBusiness Center*** and will require obtaining an ***eBusiness Center account***.

If you have questions pertaining to the stormwater requirements, see the fact sheet "***Does my small business need a stormwater permit***?" or contact ***your local Ohio EPA district office*** or the ***Division of Surface Water***.

Stormwater Discharge Requirements Self-Assessment Check

Any shaded areas indicate the need for further assessment or identifies a potential compliance area that should be addressed. Need help determining your compliance with regulations or determining your next steps? Contact OCAPP at (800) 329-7518 for free and confidential assistance.

Self-Assessment Check – Stormwater Discharge Requirements		
1) Have you developed your onsite SWPPP?	☐ Yes	☐ No
2) Do you have a general industrial stormwater NPDES permit from Ohio EPA or if applicable a no exposure certification?	☐ Yes	☐ No

Underground Storage Tank Requirements

An underground storage tank, or UST, is a tank and any underground piping connected to the tank that has at least 10 percent of its combined volume underground. Salvage yards in Ohio that have USTs for storage of petroleum or hazardous substances are regulated by the Division of State Fire Marshal, Bureau of Underground Storage Tanks Regulation (BUSTR). The UST regulations apply only to underground tanks and piping that store either petroleum or certain hazardous substances.

If you are using an underground tank for storage of petroleum or hazardous substances, you could be subject to these regulations. Some tanks are exempt from the regulations, including certain farm/residential units, small tanks (storing 110 gallons or less) and some process-related tanks. Specific information on these exemptions is included in Ohio's UST rules.

Tanks installed after 1998 are required to have leak detection systems. UST owners and operators are responsible for reporting and cleaning up any releases. UST systems must be registered with the State Fire Marshal's Office. Financial assurance is also required for UST operators to ensure that adequate funds are set aside to cover the costs associated with a leak or cleanup.

In addition, a certified tank installer must oversee any installation, removal, or repair of an underground tank. A permit from BUSTR is required for any installation, upgrade, major repair, or closure of an underground tank. There are also closure guidelines for tanks that are taken out of service, removed, or closed. More information on the BUSTR program can be found on the Ohio State Fire Marshal's ***BUSTR website*** or see the appendix for additional information.

Spill Prevention Control and Countermeasure Requirements

If you handle oil or oil products at your salvage yard, you could be subject to the Spill Prevention Control and Countermeasure (SPCC) rules. These regulations require that companies prevent and contain discharges of oil or petroleum products.

Under SPCC rules, the definition of oil is very broad and includes animal, vegetable, and soluble oils. Other common oil and petroleum products that are regulated include heating oil, crude oil, mineral oil, gasoline, and diesel fuel. The regulations apply to the storage of used oil and oil products.

Oil Spill Prevention

If you have any of the following oil storage capacities, you are subject to the SPCC rules:

- A total aboveground storage capacity of 1,320 gallons
- More than 42,000 gallons underground storage capacity (this excludes tanks regulated under BUSTR)

In determining whether these rules apply, you must consider the capacity of your tanks or containers and not the actual amount of oil stored. If you store oil in containers that are less than 55 gallons in size, you do not need to include these in calculating your SPCC storage capacity. Under these rules, the definition of oil is very broad and includes animal, vegetable, and soluble oils. Other common oil and petroleum products that are regulated include heating oil, crude oil, mineral oil, gasoline, and diesel fuel.

If you are subject to the SPCC rules, you must provide secondary containment for oil or petroleum product storage units to contain any releases. You must also prepare a written SPCC plan.

Secondary containment must be sufficient to contain precipitation and the volume of the largest tank or container in each storage area. To meet these criteria, containment systems are typically designed to hold 110 percent of the volume of the largest tank or container in the area.

You must have a written SPCC plan which describes all measures taken at your salvage yard to prevent and control a release of oil or petroleum products. The SPCC plan must be prepared and implemented before you begin to store oil and it must be updated every five years, or whenever significant changes in oil storage occur. You must also train employees who handle oil on the contents of the plan.

You must have the plan certified by a professional engineer if engineering work is involved. If your SPCC plan is very simple in nature and does not require engineering work, you as the owner or operator may self-certify. Please contact the ***Ohio Board of Registration for Professional Engineers and Surveyors***, ***U.S. EPA*** or see our ***SPCC fact sheet*** for more information. The plan is to be reviewed every five years, or whenever there is a change at the business. The written SPCC plan must also be submitted to U.S. EPA whenever there is a spill of 1,000 gallons or more, or two releases of more than 42 gallons each within a 12-month period.

Spill Prevention Control and Countermeasure Requirements Self-Assessment Check

Any shaded areas indicate the need for further assessment or identifies a potential compliance area that should be addressed. Need help determining your compliance with regulations or determining your next steps? Contact OCAPP at (800) 329-7518 for free and confidential assistance.

Self-Assessment Check – Spill Prevention Control and Countermeasure Requirements		
Oil Spill Prevention		
1) If you store used oil or petroleum products (for example, gas, diesel fuel):		
a) Do you have a total above-ground used oil storage capacity of 1,320 gallons or more?	☐ Yes	☐ No
b) Do you have more than 42,000 gallons of underground used oil storage capacity?	☐ Yes	☐ No
c) If you have any of the above capacities, are you in compliance with SPCC requirements?	☐ Yes	☐ No
d) If you've had any spills of used oil or petroleum products, have they been promptly cleaned up?	☐ Yes	☐ No

Appendix A: Glossary of Environmental Terms

Air Pollutant: Any substance in air that could cause a threat to public health or the environment. Pollutants may be solid particles, liquid droplets, or gases (alone or in combination). Generally, they fall into the following categories: solids; sulfur compounds; volatile organic chemicals; nitrogen compounds; oxygen compounds; halogen compounds; radioactive compounds; and odors.

Very Small Quantity Generator (VSQG): Generators of less than 220 pounds (roughly ½ of a 55-gallon drum) per month of hazardous waste.

Direct Discharger: A municipal or industrial facility that introduces pollution directly to a waterway through a conveyance system such as outlet pipes.

EPA Identification Number: A 12-character, site-specific identification number required by small and large quantity hazardous waste generators.

Hazardous Air Pollutants (HAPs): A list of 187 air pollutants that are known or suspected to cause cancer or other serious health effects.

Indirect Discharge: Commercial or industrial facilities that discharge pollutants through local sewers into a publicly owned waste-treatment system.

Large Quantity Generator (LQG): Facility that generates 2,200 pounds (roughly five 55-gallon drums) or more of hazardous waste, or more than 2.2 pounds of acute hazardous waste in a calendar month.

National Pollutant Discharge Elimination System (NPDES): A provision of the Clean Water Act that prohibits discharge of pollutants into waters of the United States unless a permit is issued.

Pollution Prevention (P2): The use of source reduction techniques to reduce risk to public health, safety, welfare and the environment and, as a second preference, the use of environmentally sound recycling to achieve these same goals. P2 addresses all types of waste and environmental releases to the air, water and land.

Pretreatment: Processes used to reduce or eliminate wastewater pollutants before they are discharged into a POTW.

Publicly Owned Treatment Works (POTWs): Public sewage/wastewater treatment facilities. POTWs are owned and operated by cities or municipalities.

Sanitary Waste: Waste discharged from sinks, showers, kitchens, rest rooms or other non-industrial operations.

Small Quantity Generator (SQG): A facility that generates more than 220 pounds and less than 2,200 pounds (more than ½ of a 55-gallon drum but less than five 55-gallon drums) of hazardous waste in a calendar month.

Stormwater: Rainwater and snow melt that runs off the land and enters streams, rivers and lakes. Stormwater runoff from outdoor production activities or material storage areas may contain a variety of pollutants that can degrade the quality of waters of the state and pose threats to human health.

Treatment, Storage or Disposal Facility: An Ohio EPA-permitted facility that conducts hazardous waste treatment, storage or disposal activities.

Volatile Organic Compounds (VOCs): Organic chemical compounds that under normal conditions significantly vaporize into the air. VOCs typically are industrial solvents.

Universal Wastes: Specific hazardous wastes that a generator can choose to manage in an alternative manner instead of the more complex hazardous waste requirements.

Appendix B: Helpful Web Links and Additional Information

General/Ohio EPA

Ohio EPA district offices and local air agencies
Small Business Environmental Compliance Self-Assessment Guide
Ohio EPA eBusiness Center website
Ohio EPA YouTube website/training videos

Air Permitting-General

Ohio EPA fact sheet: ***Does My Small Business Need an Air Permit?***
Ohio EPA District Office or Local Air Agency Contacts
General Permit Website

Air Permit Exemptions

Ohio EPA fact sheet: ***Air Permit Exemptions***
Air Permit Exemptions and Permits-by-Rule: ***(OAC) 3745-31-03***
Ohio EPA de minimis air permit exemption: ***(OAC) 3745-15-05***

Air Permits-by-Rule

Ohio EPA fact sheet: ***Permit-by-Rule for Air Pollution Sources***
Air Permits-by-Rule: ***(OAC) 3745-31-30***
Ohio EPA Permit-by-Rule Website

Air Rules

Ohio EPA particulate matter rule ***(OAC) 3745-17-11***
Ohio EPA volatile organic compounds from stationary sources rule ***(OAC) 3745-21-09***

Refrigerant

U.S. EPA requirements for services vehicle air conditioning systems
U.S. EPA Section 609 technician training and certification programs
U.S. EPA Section 609 certified refrigerant recovery equipment

Open Burning

Ohio EPA open burning rules
Ohio EPA fact sheet ***Before You Light It…Know Ohio's Open Burning Regulations***

Hazardous Waste

Ohio EPA hazardous waste rules
Ohio EPA fact sheet ***Identifying Your Hazardous Waste***
Ohio EPA fact sheet ***Are You Properly Managing Your Hazardous Waste Containers***
Hazardous waste generator requirements summary table
Notification of Regulated Waste Activity Webpage (location of RCRA Subtitle C Site Identification Form or Form 9029)
U.S. EPA guidance document ***Managing your Hazardous Waste: A Guide for Small Businesses*** (available in several different languages)
Ohio Commercial Facilities accepting hazardous waste (updated January 2020)

Universal Waste

Ohio EPA universal waste webpage
Ohio EPA fact sheet ***Universal Waste***
Ohio EPA fact sheet ***Ohio-Specific Universal Waste***
Ohio EPA fact sheet ***Questions & Answers Ohio-Specific Universal Waste (Aerosol containers, Antifreeze, Paint and Paint-related wastes)***
Ohio EPA fluorescent lamps webpage
Ohio EPA fact sheet ***Managing Fluorescent Lamps***

Solvent Contaminated Wipes

Ohio EPA ***solvent-contaminated wipes rule***
Ohio EPA fact sheet ***The Management of Solvent-Contaminated Wipes and other Textiles Laundered for Reuse***

Empty Containers

Hazardous waste rules for residues of hazardous waste in empty containers ("RCRA empty" rule) ***(OAC) 3745-51-07***

Ohio EPA fact sheet ***Are you Properly Managing your Hazardous Waste Containers?***

Used Oil

Ohio EPA used oil rules ***(OAC) 3745-279***

Ohio EPA fact sheet ***The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil***

Ohio EPA fact sheet ***Burning Used Oil in a Space Heater - for Business***

Oil Spill Prevention

Ohio EPA fact sheet ***Understanding the Spill Prevention, Control and Countermeasure (SPCC) Requirements***

Air Bag Inflators & Modules

U.S. EPA ***Interim Final Rule for Safe Management of Recalled Airbags***

U.S. EPA memo on the Regulatory Status of Automotive Airbag Inflators and Fully Assembled Airbag Modules

National Highway Traffic Safety Administration recall web page

Mercury Switches

Ohio EPA universal waste webpage

Ohio EPA fact sheet ***Universal Waste***

Ohio EPA fact sheet ***Mercury-Containing Equipment is Universal Waste***

End of Life Vehicle Solutions website

Recycling and Source Reduction

Ohio EPA Recyclers and Environmental Service Providers database

Ohio EPA Recycling Website

U.S. EPA Pollution Prevention Website

Ohio Material Marketplace (OMM) – free, online platform allowing Ohio businesses to connect and find reuse and recycling opportunities for wastes

Gasoline Dispensing Facilities

Ohio EPA requirements for gas stations

Underground Storage Tanks

Ohio State Fire Marshal ***Bureau of Underground Storage Tanks Regulation (BUSTR)***

Scrap Tires

Ohio EPA scrap tire webpage

Ohio EPA fact sheet ***Scrap Tire Generators: Know your Ohio EPA Regulations***

Lead Acid Batteries

Ohio EPA lead acid battery rule ***(OAC) 3745-266-80***

Ohio EPA fact sheet ***Lead-Acid Batteries Must be Recycled***

Wastewater

Ohio EPA wastewater permit-to-install (PTI) webpage

Ohio EPA NPDES general permits webpage

Ohio EPA fact sheet ***Do you know where your floor drains go?***

Ohio EPA fact sheet ***Mobile Power Washing and Environmental Regulations***

Stormwater

Ohio EPA Industrial Stormwater – General Permit webpage

Ohio EPA fact sheet ***Does my small business need a stormwater permit?***

Ohio EPA YouTube Webinar ***Preparing a Stormwater Pollution Prevention Plan (SWP3)***

Ohio EPA YouTube Webinar ***How to Activate & Enter a Report in Ohio EPA's Electronic Discharge Monitoring Reporting (eDMR) System***

U.S. EPA fact sheet ***Industrial Stormwater Fact Sheet Series – Sector M: Automobile Salvage Yards***

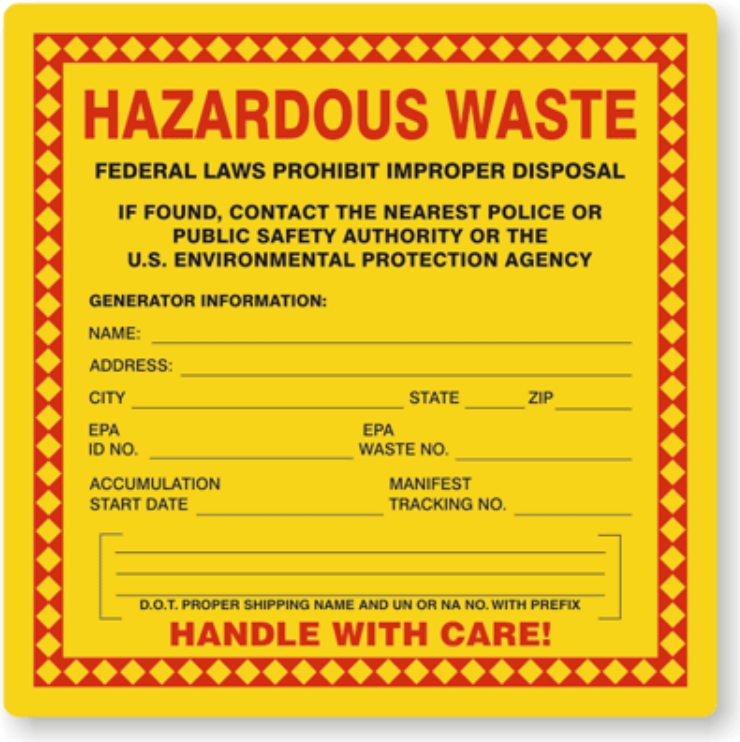
U.S. EPA fact sheet ***Conditional No Exposure Exclusion for Industrial Activity***

Public Water Systems

Ohio EPA public water systems webpage

Appendix C: Example Materials and Waste Container Labels

These labels are provided as examples and should not been seen as ensuring compliance with all applicable rules regarding materials and waste management. Please review all applicable rules to ensure that your salvage yard is in compliance.



USED OIL

UNIVERSAL WASTE LAMPS

UNIVERSAL WASTE LAMPS

UNIVERSAL WASTE BATTERIES

UNIVERSAL WASTE BATTERIES

UNIVERSAL WASTE ANTIFREEZE

UNIVERSAL WASTE AEROSOL CONTAINERS

UNIVERSAL WASTE PAINT

PAINT-RELATED UNIVERSAL WASTE

EXCLUDED SOLVENT CONTAMINATED WIPES

EXCLUDED SOLVENT CONTAMINATED WIPES

Appendix D: Commercial Recycling Services and Facilities Accepting Hazardous Waste

Ohio EPA maintains a searchable database of ***commercial recycling facilities***, including:

- Commercial facilities accepting hazardous waste
- Antifreeze recycling services
- Used oil recyclers
- Oil filter recycling and transportation services
- Lamp recyclers
- Refrigerant reclaimers and handlers

Please note that this list is only a partial representation of providers and is updated periodically. This list should not be seen as an endorsement or approval of the businesses by Ohio EPA. You are encouraged to research the compliance status of any business you utilize. For more information, contact Ohio EPA's Office of Compliance Assistance and Pollution Prevention at (800) 329-7518 or visit ***OCAPP's webpage.***

Appendix E: De Minimis Example Emissions Calculations and Documentation

A *de minimis* air contaminant source is one that emits less than 10 pounds per day of air contaminants and less than one ton per year of hazardous air pollutants. A source that is de minimis does not need an air pollution permit from the Ohio EPA.

Disclaimer: This appendix is a tool to help companies claim and document a de minimis exemption. The examples provided are for information only, and do not guarantee compliance with all applicable state and federal environmental regulations.

De Minimis Air Pollutant Emission Calculations
*Example Only – Actual Data May Vary

Company: ABC Body Shop, Inc.

Equipment Description: Paint spray booth with exhaust filters.

Control Equipment: Paper exhaust filters

Normal Operating Schedule: 8 Hrs./day 2000 Hrs./year (1 shift)

Basis for Calculations: Material Balance
Historic records for shop paint and solvent use
SDS for paints, reducer, and solvents

Actual Daily Emissions:

VOC of paints and solvents used:
1. Sherwin-Williams Polane Topcoats (various colors): 4.8 lbs. VOC/gal. max. per SDS
2. Sherwin-Williams Primer: 4.9 lbs. VOC/gal. per SDS
3. Reducer for paints: 6.71 lbs. VOC/gal. per SDS

Maximum daily usage (from historic records)
Primer: 0.5 gallon/day
Topcoats: 0.5 gallon/day
Reducer/cleanup: 0.5 gallon/day

Emissions from Primer = (4.9 lbs. VOC/gal) (0.5 gal/day) = **2.45** lbs. VOC/day
Emissions from Topcoats = (4.8 lbs. VOC/gal) (0.5 gal/day) = **2.4** lbs. VOC/day
Emissions from Reducer/Cleanup = (6.71 lbs. VOC/gal) (0.5 gal/day) = **3.36** lbs. VOC/day

Total actual daily emissions = 2.45 + 2.4 + 3.36 = **8.21 lbs. VOC/day**

Potential Daily Emissions at 24 hrs./day (3 shifts) = 8.21lbs VOC/day x 3 = **24.6 lbs. VOC/day**

Summary:

Actual emissions are less than 10 lbs. per day, but potential emissions can exceed 10 lbs. per day. Therefore, to claim de minimis status per OAC 3745-15-05, the company must keep records to show that emissions are maintained below 10 lbs. per day.

Description of records kept: Daily log of paint, reducer, and cleanup usage and resulting emissions.

Completed by: James Doe, ABC Body Shop
Date: August 10, 2022

Daily Paint and Solvent Usage Record and Emissions Tracking Sheet

Company Name: ABC Body Shop, Inc.

Month/Day	Paint ID	VOC content (lbs./gal) (A)	# gallons (B)	Reducer/ Thinner ID	VOC content (lbs./gal) (C)	# gallons (D)	Total VOC emissions, lbs./day = [(A) x (B)] + [(C) x (D)] (<10 lbs./day for de minimis tracking)
2/22/22	SW red 5602 SW primer	4.55 4.9	0.2 0.1	SW auto solve 100	6.7	0.2	4.55(0.2) + 4.9 (0.1) + 6.7(0.2) = 2.74
3/18/22	SW red 5421 SW primer	4.6 4.9	0.2 0.1	SW auto solve 100	6.7	0.2	4.6(0.2) + 4.9 (0.1) + 6.7(0.2) = 2.75
4/6/22	SW green 5701 SW primer	4.73 4.9	0.1 0.1	SW auto solve 100	6.7	0.2	4.73(0.1) + 4.9 (0.1) + 6.7(0.2) = 2.30
4/10/22	SW silver 5800 SW primer	4.55 4.9	0.3 0.1	SW auto solve 100	6.7	0.4	4.55(0.3) + 4.9 (0.1) + 6.7(0.4) = 4.56
5/18/22	SW blue 1177	4.8	0.3	SW auto solve 100	6.7	0.1	4.80(0.3) + 6.7(0.1) = 2.11
7/9/22	SW silver 5566	4.35	0.2	SW auto solve 100	6.7	0.1	4.35(0.2) + 6.7(0.1) = 1.54
7/27/22	SW red 5602 SW primer	4.55 4.9	0.2 0.1	SW auto solve 100	6.7	0.2	4.55(0.2) + 4.9 (0.1) + 6.7(0.2) = 2.74
8/5/22	SW primer	4.9	0.5	SW auto solve 100	6.7	0.2	4.9(0.5) + 6.7(0.2) = 3.79
8/22/22	SW black 9909	4.6	0.5	SW auto solve 100	6.7	0.3	4.60(0.5) + 6.7(0.3) = 4.31
9/10/22	SW red 5602 SW primer	4.55 4.9	0.2 0.1	SW auto solve 100	6.7	0.2	4.55(0.2) + 4.9 (0.1) + 6.7(0.2) = 2.74
10/22/22	SW primer	4.9	0.5	SW auto solve 100	6.7	0.2	4.9(0.5) + 6.7(0.2) = 3.79

Daily Paint and Solvent Usage Record and Emissions Tracking Sheet

Company Name: _____

Month/Day	Paint ID	VOC content (lbs./gal) (A)	# gallons (B)	Reducer/ Thinner ID	VOC content (lbs./gal) (C)	# gallons (D)	Total VOC emissions, lbs./day = [(A) x (B)] + [(C) x (D)] (<10 lbs./day for de minimis tracking)

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