



Small Business Assistance Office

Environmental Compliance Guide for Motor Vehicle Salvage Yards

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Introduction

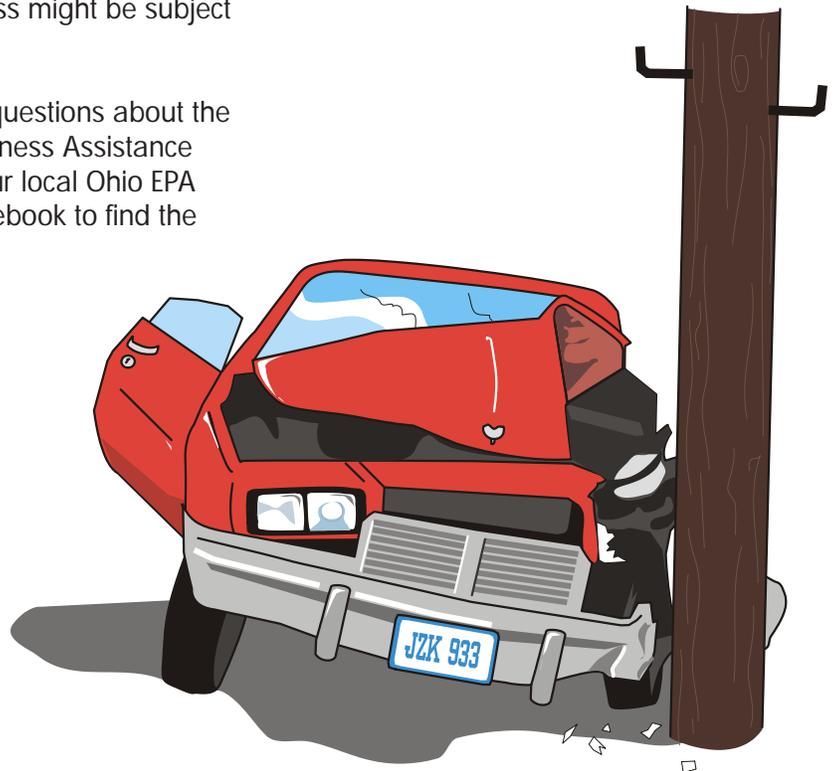
If you operate an auto salvage business, it is important for you to know the Ohio EPA regulations that apply to your activities. You may need permits for air pollution sources or wastewater discharges. You may also be required to notify Ohio EPA if you generate any hazardous waste.

Complying with some regulations, such as getting a permit, may take some time. So, the earlier you look into your responsibilities under the rules the better.

This guidebook summarizes some of the major environmental requirements that could apply to your auto salvage business. It may not cover every requirement, and should not be used as your only source of information on the regulations. It provides you with a starting point to identify areas where your business might be subject to regulation.

If you need more information or have additional questions about the environmental regulations, contact the Small Business Assistance Office at (800) 329-7518. You can also contact your local Ohio EPA district office. See the map at the end of this guidebook to find the district office which covers your area.

It is important that you are aware of and in compliance with the regulations to ensure that your company does not face environmental violations or penalties. Under Ohio's laws, a company can be fined up to \$10,000 per day for environmental violations!



Air Pollution Requirements

Under Ohio's regulations, it is your responsibility to obtain all environmental permits that are needed for your business. Air pollution permits are required for "air contaminant sources." An air contaminant source is anything that emits air pollutants, such as particulates, dust, fumes, gases, mist, smoke, vapors or odors.

While this definition covers many different processes, there are four rules of thumb that can often help identify an air contaminant source. Does your business:

- Have something with a stack, dust collector or vent?
Examples: shotblasters, grinders, storage tanks.
- Have a process that uses paints, solvents, adhesives or other chemicals?
Examples: paint booths, degreasers, solvent cleaning tanks.
- Have a process that burns fuel (e.g., oil, natural gas, coal)?
Examples: boilers, furnaces, process heaters.
- Have a process that produces visible dust, smoke or odors?
Examples: unpaved roadways, material handling areas.

You may have activities at your salvage yard that are subject to Ohio EPA's air pollution control regulations. If your business involves collision repair or painting, a permit may be needed, especially for units such as spray booths. Paints and solvents are regulated because they often contain volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). VOCs contribute to photochemical smog. HAPs are harmful to human health and many are suspected to cause cancer. For these reasons, Ohio EPA regulates the emission of paints and solvents through permits. In addition to painting, metal recovery activities (such as lead, aluminum or copper recovery) may require a permit.

There are two permits required for an air pollution source: the permit-to-install (PTI) and permit-to-operate (PTO). The permit-to-install is required before installing equipment. The permit-to-operate is needed to operate the equipment after installation. Please note that if you are already operating your business and discover that you need an air permit, you must still complete and submit PTI and PTO applications. Most permits will require you to limit air pollutant emissions (e.g., pounds per day or pounds per hour of VOCs). The permit will often require that daily or monthly operating records be kept on site.



Paints and solvents are regulated because they often contain volatile organic compounds (VOCs) and hazardous air pollutants (HAPs).

There are some exemptions from permitting for small air pollution sources (deminimis sources). Whether a unit is exempt depends on factors such as the size of the operation and the types of materials used in the process (e.g., low VOC coatings).

Contact your local Ohio EPA district office, Division of Air Pollution Control or Small Business Assistance Program at (614) 644-4830 for more information on the deminimis exemption or air permitting requirements.

Open Burning

Salvage yard owners need to be aware of Ohio EPA's open burning regulations, found in Chapter 3745-19 of the Ohio Administrative Code (OAC). "Open burning" is burning materials like trash, leaves, tree trimmings, tires and construction debris outdoors. When these materials are burned, they can release harmful air pollutants. Gases released by open burning can also corrode metal siding and damage paint on buildings.

Under Ohio's air pollution control regulations, a business cannot burn trash or any other waste for the purpose of waste disposal. A common violation Ohio EPA sees at small businesses is open burning wastes like pallets, trash or used shop rags.

A few types of open burning are allowed by businesses. In these situations, the business does not need to notify Ohio EPA or obtain permission from the Agency before burning. However, fires must be kept to a minimum size, cannot be used for waste disposal and the fuel burned must help minimize the emission of air contaminants. Examples of acceptable open burning include:

- heating tar;
- welding and acetylene torches;
- smudge pots and similar occupational needs; and
- heating for warmth of outdoor workers or strikers.

Ohio EPA can also authorize other open burning activities such as: fires for controlling diseases/pests, ceremonial fires, fire fighting training, managing land clearing wastes and emergency management of ignitable or explosive wastes. Before conducting any of these activities, the company must first contact Ohio EPA's Division of Air Pollution Control. Special conditions may apply to some activities. In addition, the business may be required to complete an application and obtain written approval from the Agency before open burning.

There may also be local laws in your area regarding open burning. These local ordinances may be more strict than Ohio EPA's regulations. Knowing the open burning regulations can help your company avoid violations or penalties.

"Open burning" is burning materials like trash, leaves, tree trimmings, tires and construction debris outdoors.



Under Ohio's regulations, you CANNOT open burn waste at your salvage business.

If you have any questions about the open burning requirements, contact your local Ohio EPA district office, Division of Air Pollution Control.

Freon Recovery

U.S. EPA regulates how freon is handled from motor vehicle air conditioners. Under these regulations, refrigerants must be removed from salvage vehicles before the vehicles are recycled. The rules also set standards for freon recovery and disposal.

Technician Training

Technicians who recover freon from salvage vehicles must be trained and certified by a U.S. EPA-approved organization. Training must include instruction on the proper use of equipment, regulatory requirements, importance of refrigerant recovery and the effects of ozone depletion. To be certified, technicians must pass a test demonstrating their knowledge in these areas. A list of approved testing programs is available from the U.S. EPA ozone hotline and Web site.



U.S. EPA's Ozone Protection Program
Hotline: 800-296-1996
Web site: www.epa.gov/ozone/index.html

Prohibition on Venting Refrigerants

The Clean Air Act prohibits venting freon into the atmosphere.

For more information on the freon recovery requirements, contact U.S. EPA's Ozone Protection Program at (800) 296-1996.

Approved Equipment

Technicians who service salvage vehicles must use U.S. EPA-approved equipment for refrigerant recovery and recycling. Recover/recycle equipment cleans the refrigerant so that contaminants like oil, air and moisture reach acceptably low levels. A list of approved recovery and recycling equipment is available from U.S. EPA's ozone hotline and Web site. Service shops performing recovery/recycle operations must certify to U.S. EPA that they own approved equipment.

Disposal and Recordkeeping

Freon recovered from salvage vehicles must either be sent off-site to a reclamation facility or recycled on-site. For any recycling done on-site, there are specific procedures in the regulations that you must follow. For refrigerants sent to a reclamation facility, you must keep records, including the name and address of the reclaimer.

Scrap Tires

Ohio EPA has regulations in place for businesses that handle scrap tires. These regulations are found in Chapter 3745-27 of the Ohio Administrative Code (OAC). As a motor vehicle salvage business, you could be subject to these regulations if you generate, store or transport scrap tires. 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 defined as a scrap tire.

If you store scrap tires at your salvage yard, you may be required to register your business and get a storage license from Ohio EPA. Whether or not you need to register and get a license depends on factors such as the size of the storage area and whether tires are processed on-site or accepted from other businesses. There are fees associated with scrap tire registration and licensing.

Ohio's scrap tire regulations also outline the procedures that you must follow to ensure that scrap tires do not pose a health or fire hazard. For outdoor piles, these requirements include covering tire piles and having adequate mosquito control measures. All tires must also be stored safely to prevent fires, with adequate aisle space and protection from sources of ignition.

If you transport scrap tires, you may be subject to Ohio EPA's transporter requirements and may need to register as a scrap tire transporter. Whether you need to register depends on how many tires are transported in a load. (This does not include tires that are still on a salvage vehicle while the vehicle is being transported.) The transporter requirements also include completing shipping papers and obtaining financial assurance.

Finally, you can dispose of or recycle scrap tires only at facilities that have been approved by Ohio EPA. Contact Ohio EPA's Division of Solid and Infectious Waste Management for more information on scrap tire requirements. In some areas, the local health department may be responsible for the scrap tire program. You can contact your local health department for information and assistance.

Tires that are removed from vehicles (both those on and off rims) are defined as scrap tires.



Outdoor tire piles can create a health and fire hazard.



Poorly managed scrap tires can create a breeding ground for disease-carrying mosquitoes.

Used Oil

If you generate used oil from your salvage business, you are subject to Ohio's used oil regulations, found in Ohio Administrative Code (OAC) Chapter 3745-279. Some examples of used oil include engine oil, lubricating oil, brake fluid, transmission fluid and hydraulic fluid.

Many of the used oil regulations relate to good housekeeping practices. As a used oil generator, you must:



- label all storage containers or tanks with the words *used oil*;
- store used oil in containers or tanks that are in good condition (not rusting, leaking);
- if there is a leak of used oil: stop the leak, contain it, clean it up and properly manage the cleanup materials.
- use a transporter with an EPA identification number to ship used oil off site.

As a generator, you must ensure that used oil is properly managed by a recycling or disposal company. The best way to manage used oil is to send it off site to a recycling company. The regulations encourage different recycling options such as reconditioning, refining, reusing or burning for energy recovery. You should also be aware that under Ohio's used oil regulations, it is also illegal to use used oil as a dust suppressant on roadways, drives or on other areas of your property.

Ohio EPA's Division of Hazardous Waste Management (DHWM) has a list of commercial used oil recyclers in Ohio. In addition, the division has a list of companies that collect used oil filters. To get these lists, contact DHWM at (614) 644-2917.

Handling Used Oil

DON'T throw your used oil on the ground, down the sewer, into a dry well, in a septic tank or down a floor drain.

DON'T put liquid used oil in the trash dumpster with your solid waste. Solid waste landfills can't take liquids.

DON'T mix your used oil with materials that might cause the whole mixture to become a hazardous waste, such as solvents or brake cleaner.

DON'T use used oil as a dust suppressant on your property.

DO inspect your used oil areas for leaks or spills and take quick action if clean-up is needed.

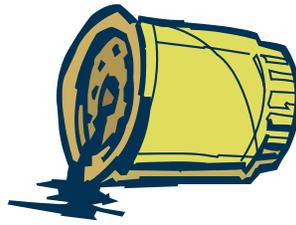
DO train employees on the correct methods for handling used oil.

DO look for ways to recycle used oil. If the used oil can't be recycled, it must be properly disposed of.

Used Oil Filters

Under Ohio's used oil regulations, you do not need to handle used oil filters as hazardous waste if the filters are non terne-plated and have been properly drained of used oil.

Under Ohio's regulations, four different methods are acceptable for "hot-draining" used oil filters. Hot draining means you remove and drain the filter at close to engine temperature. Acceptable hot-draining methods include:



Gravity Draining

When the filter is removed from the engine, it is placed with its gasket side down in a drain pan. If the filter has an anti-drain valve, the "dome end" of the filter is punctured with a screwdriver (or similar device) so the oil can flow freely. The filter needs to drain for 12-24 hours.

Crushing

The filter is crushed by a mechanical, pneumatic, or hydraulic device to squeeze out the used oil. The remaining filter material is compacted.

Disassembly

The filter is separated into its different parts using a mechanical device. Then, metal, rubber and paper can be recycled separately.

Air Pressure

The filter is placed into a device where air pressure forces the used oil out of the filter.

Once you have properly drained non terne-plated filters, you can send these filters to a recycling facility as scrap metal, or dispose of them as non-hazardous waste. If you properly drain terne-plated filters, you can also send these filters to a scrap metal recycler. If terne-plated filters are not recycled as scrap metal, you must determine whether the filters are hazardous wastes. If they are hazardous, you must manage them according to Ohio EPA's hazardous waste requirements. This includes sending the filters to a permitted hazardous waste facility for disposal. Please note that you must manage any oil removed from a filter according to Ohio EPA's used oil rules.

Terne is an alloy of lead and tin. The lead in terne plating can make a used oil filter hazardous. Terne-plated filters are used more commonly with heavy-duty vehicles such as buses and trucks.

If you are not going to drain your used oil filters, you must evaluate the filters to see if they are hazardous before disposal. You cannot throw any undrained filters into the trash dumpster unless you have evaluated the filters first and found them to be non-hazardous.

Also note that even if the filters are non-hazardous, a solid waste landfill will not accept them if they contain free liquids. Because of this, your best option for handling used oil filters is to drain them and send them to a recycling facility.

Ohio EPA's Division of Hazardous Waste Management (DHWM) has a list of commercial used oil recyclers in Ohio. In addition, the division has a list of companies that collect used oil filters. To get these lists, contact DHWM at (614) 644-2917.

Burning Used Oil in Space Heaters

During colder months, some auto service businesses help heat their shops by burning used oil in space heaters. It's important these businesses are aware of Ohio EPA's used oil and air pollution requirements. The used oil regulations state that used oil may be burned in space heaters if the following conditions are met:

- the space heater is only used to burn oil that is generated at the business or received from a do-it-yourself oil changer who generated it as a household waste;
- the space heater does not exceed a capacity of 500,000 (.5 million) British Thermal Units (BTUs) per hour; and
- combustion gases from the unit are vented to the outside.



It's also important to know that burning used oil in space heaters causes air pollution. The level of air pollution released depends on the amount of oil burned. Space heaters that have a burner rating of less than 500,000 BTUs per hour usually cause little air pollution and can qualify for the "de minimis exemption" under OAC Rule 3745-15-05.

Qualifying for the de minimis exemption means an air permit from Ohio EPA is not required to install or operate the space heater. If the space heater qualifies for this exemption, you should, however, keep a monthly record of the amount burned and the origin of the waste oil (either generated on-site or received from a do-it-yourselfer). Records of any lab testing performed on the oil should also be kept in file.

The burner rating (BTU capacity) is usually found on the space heater or in the manufacturer's literature. Many space heaters on the market are rated less than 500,000 BTU per hour. If the heater rating is unknown, you can contact the manufacturer for this information.

It's important to know that burning used oil in space heaters causes air pollution.

Acceptable oils for burning include used crankcase oils from autos and trucks, lubricating oils, 90 W. gear oil, automatic transmission fluid and hydraulic oil. Burning other types of waste oil may require approval from Ohio EPA's Division of Air Pollution Control (DAPC).

Contact the DAPC Small Business Assistance Program at (614) 644-4830 to get a copy of the de minimis exemption, or for additional information on the air pollution requirements for space heaters. For more information on the used oil rules, contact the Compliance Assurance Section in the Division of Hazardous Waste Management at (614) 644-2917 or your local Ohio EPA district office.

Oil Spill Prevention

If you handle oil or oil products at your facility, you could be subject to the Spill Prevention Control and Countermeasure (SPCC) regulations. These regulations require that companies prevent and contain discharges of oil or petroleum products. If you have any of the following oil storage capacities, you are subject to the SPCC regulations:



- a total aboveground storage capacity of 1,320 gallons; or
- greater than 660 gallons capacity in a single aboveground container; or
- more than 42,000 gallons underground storage capacity.

In determining whether these regulations apply, you must consider the *capacity of your tanks or containers* and not the actual amount of oil stored. You should also be aware that, under these regulations, 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 must be designed to hold 110 percent of the volume of the largest tank or container in the area.

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.

You must also have a written SPCC plan which describes all measures taken at your facility to prevent and control a release of oil or petroleum products. The SPCC plan must be written within six months after you begin to store oil and it must be updated every three years, or whenever significant changes in oil storage occur. You must also train employees on the contents of the plan. The SPCC plan must be signed by your management and certified by a professional engineer (PE). Your management must review and sign the plan every three years, even when there are no changes. The SPCC plan must be kept on-site and be available for review.

Contact your local Ohio EPA district office, Division of Emergency and Remedial Response for more information on the SPCC requirements.

Antifreeze

Antifreeze drained from autos, trucks or other engines is considered a waste. Ohio EPA does not regulate used antifreeze as hazardous waste unless it contains high enough levels of certain metals, such as lead, cadmium or chromium. It can also be a hazardous waste if it has been mixed with other wastes such as gasoline or solvents. If you generate antifreeze, you must evaluate it to determine if it is a hazardous waste. You must also properly manage and dispose of spent antifreeze.

You CANNOT dispose of used antifreeze by pouring it into your septic system, on the ground, or in the trash. In most areas of Ohio, you also cannot dispose of antifreeze in the sanitary sewer. You can hire a disposal company to dispose of your used antifreeze, but this will usually be the most expensive option.

The best option for handling used antifreeze is to have it recycled. There are three ways you can recycle used antifreeze. You can purchase a small antifreeze recycling system to use at your facility. You can hire a mobile recycling company to come to your business, recycle the antifreeze and leave the recycled product for you to reuse. Or, you can hire a company to pick up your used antifreeze and recycle it at a central facility. If you recycle your own antifreeze on-site, you must make sure that any wastes from recycling (e.g., sludges, filters) are also evaluated to see if they are hazardous.

If your used antifreeze is a hazardous waste and you do not have it recycled, you must dispose of it at a hazardous waste facility. In addition, prior to sending it off-site for recycling or disposal, the used antifreeze must be managed properly on-site as a hazardous waste (e.g., keeping closed containers, labeling, inspections, etc.).

If you would like more information about determining if used antifreeze is a hazardous waste or about used antifreeze recycling equipment or services, please call your local Ohio EPA district office, Division of Hazardous Waste Management (DHWM) or DHWM's Compliance Assurance Section at (614) 644-2917.



Handling Used Antifreeze

DON'T mix cleaning solvents, degreasers or waste fuel with used antifreeze, because this can result in a hazardous waste mixture.

DON'T dispose of used antifreeze by pouring it into your septic system, into a dry well, on the ground, or in the trash.

DO store used antifreeze in a dedicated container.

DO train employees on the proper way to handle antifreeze.

DO consider either on-site or off-site recycling.

Hazardous Waste

Under Ohio EPA's regulations, all wastes generated from a business must be evaluated to see if they are hazardous or not. If your company generates a hazardous waste, you are required to manage and dispose of that waste according to Ohio's hazardous waste regulations.

If your company generates more than 100 kilograms (220 pounds) of hazardous waste in any month, you must obtain a generator identification number from Ohio EPA. A permit is not required to generate hazardous waste. A permit is only needed in Ohio if a company wants to treat, store or dispose of hazardous waste. All hazardous waste must be sent to a permitted hazardous waste facility for treatment or disposal.

If you have a material that can no longer be used, it is considered a waste. There are two ways in which your waste can be classified as a hazardous waste:

Listed hazardous wastes

If your waste appears on any one of the lists published in Ohio's hazardous waste regulations, it is a hazardous waste. These hazardous waste lists are in the Ohio Administrative Code (OAC), rules 3745-51-31 through 3745-51-33.

Characteristic hazardous wastes

If you find that your waste does not appear on any of the lists in Ohio EPA's regulations, your waste may still be regulated if it possesses a hazardous characteristic. Under the regulations there are four characteristics that make a waste hazardous: ignitability, corrosivity, reactivity, toxicity.

Hazardous waste generated by scrap metal salvage yards may include:

- spent solvents
- solvent contaminated wipers/shop towels
- waste paints
- spent fluorescent bulbs (containing mercury)
- used antifreeze contaminated with metals, solvents or fuels
- used oil contaminated with metals, solvents or fuels
- contaminated gasoline
- lead acid batteries



Drums of hazardous waste need to be stored to prevent leaks and spills. Leaking drums, especially in outdoor areas could lead to a costly cleanup!

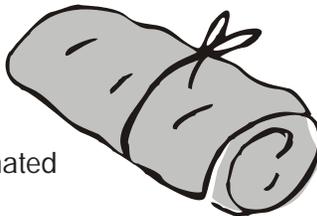
Many small businesses are hazardous waste generators. Even if you generate only a small amount of waste, the waste must still be evaluated and, if it is hazardous, properly managed. To determine if you have a hazardous waste, you must know about ALL the wastes that come from your business. Go through your business and make a list of all your wastes (include even those that you think are not hazardous). Go through the list and carefully evaluate each waste stream.

Keep any information that you use to make your waste evaluation in your files. If you do not have enough information from the process to evaluate a waste, you may need to have the waste sampled and sent to an environmental testing lab for analysis. Keep any lab results you have on your waste in a file.

If you would like more information about the hazardous waste regulations, contact your local Ohio EPA district office, Division of Hazardous Waste Management (DHWM) or DHWM's Compliance Assurance Section at (614) 644-2917.

Solvent Contaminated Wipers

Many small businesses use solvents and wipers to clean equipment. When disposed of, the solvents used for cleaning often meet the definition of a listed or characteristic hazardous waste under Ohio's regulations. Solvent wipers include both disposable and reusable rags and towels. After use, these wipers are contaminated with solvents.



If you generate solvent wipers, these wipers must be evaluated to see whether they are hazardous or not BEFORE you dispose of them. Under Ohio's regulations, you cannot throw solvent wipers in the trash unless you have information showing the wipers are not hazardous. And, in many cases, solvent wipers are hazardous, even if they seem dry when you dispose of them. There are two ways in which solvent contaminated wipers can be handled. They can either be disposed of or sent off-site to a commercial laundry for recycling.

Any company that sends contaminated wipers for disposal must evaluate those wipers to determine whether they are hazardous before they are disposed of. This includes determining whether the wipers are listed or characteristic hazardous wastes. If you have wipers that are hazardous and you want to dispose of them, you must send them to a permitted hazardous waste disposal facility.

A better option to manage solvent wipers is to send them off-site to a commercial laundry for cleaning. Under this scenario, Ohio EPA has determined solvent wipers that will be cleaned and reused are not subject to the hazardous waste regulations because they are not being discarded. All solvent wipers are eligible for this exclusion if the wipers contain no free liquids and are sent to a commercial laundry that is subject to regulation under the Clean Water Act or a dry cleaner.

Solvent wipers include both disposable and reusable rags and towels.

Evaporating Solvent Wipers

Many small business owners ask whether it is acceptable to dry out solvent wipers by leaving drum lids off or evaporating off solvents. Under Ohio's hazardous waste regulations, you CANNOT evaporate solvent contaminated wipers. In many cases, this is considered hazardous waste treatment and is not acceptable without a hazardous waste treatment permit. In addition, evaporating wipers can release air pollutants, a possible violation of Ohio's air pollution control requirements. When collecting wipers, you need to ensure that they are kept in containers that are in good condition. The containers must be kept closed, except when adding or removing wastes.

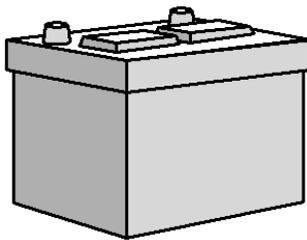
Burning Solvent Wipers

It is important to know that Ohio's waste and air pollution control regulations also prohibit the burning of solvent contaminated wipers. Therefore, you CANNOT burn wipers (or other wastes from your business) in burn barrels or trash piles.

If you would like more information about solvent contaminated wipers, contact your local Ohio EPA district office, Division of Hazardous Waste Management (DHWM) or DHWM's Compliance Assurance Section at (614) 644-2917.

Lead Acid Batteries

If you remove lead acid batteries from salvage vehicles, you need to be aware of Ohio's hazardous waste regulations that apply to this activity. If lead acid batteries are handled improperly, they can pose environmental and health hazards. Battery components are toxic and corrosive. Lead and sulfuric acid can contaminate the air, soil and water.



Companies that generate spent lead acid batteries are encouraged to send them to a recycling facility. Through recycling, both the lead and sulfuric acid can be recovered from batteries. Lead acid batteries are commonly used in cars, trucks, tractors, boats, motorcycles and other vehicles.

If you are removing lead acid batteries from vehicles and sending them to a recycling facility, they are not subject to the full scope of Ohio's hazardous waste rules. For batteries that will be recycled, you can manage them under Ohio's existing lead acid battery rules in OAC 3745-58-70. Or, you can manage them under Ohio's hazardous waste regulations as a "universal waste." The universal waste regulations are found in OAC Chapter 3745-273. Both regulations have reduced standards for batteries that will be recycled.

If you are not recycling lead acid batteries, you must evaluate them before they are disposed of to determine if they are hazardous. Because of the lead and acid contained in these batteries, they will likely be a characteristic hazardous waste. And, if not recycled, these must be sent to a permitted hazardous waste disposal facility.

You should also be aware that if you are reclaiming batteries yourself on-site by opening batteries and removing acid and/or lead, you are subject to additional hazardous waste regulations. There may also be surface water and air pollution regulations that apply to these activities.

If you would like more information about handling lead acid batteries, contact your local Ohio EPA district office, Division of Hazardous Waste Management (DHWM) or DHWM's Compliance Assurance Section at (614) 644-2917.

Lead acid batteries are commonly used in cars, trucks, tractors, boats, motorcycles and other vehicles.

Tips for Handling Spent Lead Acid Batteries

- Do not open, handle or store batteries in a way that could rupture the battery case or cause it to leak.
- Separate batteries from other wastes like paper, rags, garbage and flammable or hazardous chemicals.
- Consider using a dike or other form of secondary containment to help prevent spills, reactions or fires. If storing batteries outside, protect them from the elements and consider placing them on an impervious surface to prevent discharges.
- Monitor your battery storage area for leaks or deterioration. Take quick action to address any spills or leaks.
- Make sure employees know how to safely handle batteries.
- Don't reclaim battery components yourself, unless you are sure that you are in compliance with the hazardous waste regulations that apply to this activity.

Wastewater Discharges

A scrap metal salvage business may generate process wastewater from equipment cleaning, car washing, paint spray booths or other sources. Under Ohio EPA's regulations, options for handling process wastewater include direct and indirect discharges.

Industrial Wastewater: Direct Discharge

Any discharge of industrial wastewater to "waters of the state" will require a discharge permit (NPDES permit) from Ohio EPA's Division of Surface Water. Examples of waters of the state include: streams, rivers, lakes, ponds, marshes, watercourses, waterways, wells and springs. Wastewater discharges entering a conveyance system (like a ditch or storm sewer) that leads to a waterway may also require an NPDES permit.

You may also be required to treat wastewater to remove harmful contaminants (e.g., metals, chemicals, oils or grease) before it is discharged. If treatment is required, a separate permit is needed to construct wastewater treatment units, called a permit-to-install (or PTI). The PTI application is reviewed by Ohio EPA's Division of Surface Water.

Industrial Wastewater: Indirect Discharges

Often, the local wastewater treatment plants (POTWs) are responsible for regulating the companies that discharge wastewater to them. A large POTW may be able to handle the wastewater from your business. However, even large wastewater treatment plants are not generally designed to handle industrial wastes like chemicals, metals, oils, etc. They are designed to handle sewage related wastes and wastewater. Because of this, the treatment plant may require you to conduct "pretreatment" (e.g., remove of metals, oil or grease, etc.) before discharging your wastewater to them.

If you want to discharge industrial wastewater to a local POTW, you need to discuss these activities with the treatment plant directly. Permission to discharge to the POTW and/or obtaining a permit may be necessary. If you are required to construct wastewater treatment or storage units, this activity requires a permit to install (or PTI) from Ohio EPA.



If you discharge wastewater to a water of the state, you MUST have an NPDES permit for this activity.

NOTE

Ohio EPA's regulations prohibit the discharge of process wastewater into injection wells without a permit. Examples of injection wells include dry wells, drain fields and cesspools. In addition a septic tank, mound system or leaching line is defined as an injection well system.

Contact the Division of Surface Water at your local Ohio EPA district office for more information on the wastewater discharge and permitting requirements.

Floor Drains

Floor drains are found at many small businesses. A common floor drain system can include a concrete trench which runs down the center of a shop floor. The trench is designed to capture water, cleaners, oil, dirt or other materials. Some shops have small rectangular or round floor drains connected to underground piping.

Some floor drains are necessary for day-to-day operations. Others are used for emergency purposes only. And, some floor drains don't seem to have any apparent use. *Do you know where the floor drains in your business go? Are you discharging wastewater or other fluids into your floor drains?*

It is very important that you know where all your floor drains lead, and are aware of Ohio EPA's regulations that apply to your discharge activities. If you do not know where your drains lead, or if you are using floor drains improperly, you could be contaminating nearby surface waters or drinking waters.

Some floor drains lead into a sanitary sewer, where wastewater goes directly to a public wastewater treatment plant (POTW). Other floor drains lead to an on-site sewage treatment system like a septic tank. Sometimes floor drains lead directly to an underground holding tank or discharge to a waterway or to the ground outside. Ohio EPA's water pollution control regulations apply to all of these activities.

Any company that wants to discharge an industrial wastewater to waters of the state needs to get a permit (NPDES permit) from Ohio EPA. Examples of waters of the state include streams, rivers, lakes, ponds, marshes, waterways, wells and springs. If your floor drains lead to any water of the state, you must have a discharge permit for this activity.

Companies that discharge industrial wastewater directly to a POTW are also regulated. Often, the POTW regulates the discharge activities. If you are discharging to a POTW, you need to contact them and discuss your activities with them. You may be required to obtain a permit for the discharge. In addition, you may be required to treat the wastewater before discharging (e.g., oil/water separation, removing solids, chemicals, etc.).

A common floor drain system can include a concrete trench which runs down the center of a shop floor.



Make sure you know where your floor drains go. Make sure floor drains DO NOT discharge outside onto the ground or into an injection well system such as a septic tank or dry well.

NOTE

It is illegal to discharge process wastewater outside your business onto the ground! Make sure your floor drains don't lead outside where wastewater could end up on the ground.

Discharges to Injection Well Systems

If you have a floor drain which leads to an injection well, you are subject to Ohio's underground injection control (UIC) regulations. The UIC regulations are in place to protect underground drinking water sources from becoming contaminated. If you are discharging industrial wastewater to a floor drain that leads to a septic system or other injection well system, you could be in violation of Ohio's water pollution control laws.

Examples of injection wells include dry wells, drain fields and cesspools. In addition, a floor drain that is tied to a septic tank, mound system or leaching lines is also defined as an injection well system.

Under Ohio EPA's water pollution control regulations, a company CANNOT discharge industrial wastewater into an injection well. This activity is strictly prohibited unless a company has obtained a permit to drill and a permit to operate (UIC permit) from Ohio EPA's Division of Drinking and Ground Waters. This includes discharging industrial wastewater to an on-site sewage treatment system (e.g., septic tank, leach field). Not only would this activity be a violation without a permit, the discharged materials (chemicals, solids, oil, etc.) could also damage your on-site system.

Important Points to Remember

- Check all your floor drains and make sure you know where they drain to.
- If you are using floor drains to discharge industrial wastewater into a septic system or onto the ground, you need to stop these discharge activities immediately. You must find another way to manage your wastewater.
- If you are using floor drains to discharge industrial wastewater to a water of the state, and you do not have an NPDES permit, you must stop these discharge activities immediately. You must either obtain a permit or find another way to manage wastewater.
- If you are using floor drains to discharge wastewater to a local wastewater treatment plant, make sure the treatment plant knows about this activity. You may be required to conduct treatment on the wastewater before discharging it. You may also need to get a permit for the discharge.

Some types of disposal wells have been banned, including the use of motor vehicle waste disposal wells.

- DO NOT put other fluids like oil, solvents, paints or chemicals into a floor drain. This could contaminate your property and expose you to large fines and clean up costs.
- Think about installing an emergency shut-off on the drain pipes to prevent accidental spills from entering the sewer.
- If you have floor drains at your company that you are not using, think about having them capped or plugged. Good housekeeping and planning can help avoid costly problems later.

If you have any questions about floor drains and Ohio's water pollution control requirements, contact your local Ohio EPA district office, Division of Surface Water (DSW) for assistance. You can contact Ohio EPA's Division of Drinking and Ground Water, UIC Program at (614) 644-2752 for more information about UIC permits.

Drinking Water

If your business has its own well that provides water for drinking, cooking, washing hands, washing dishes or bathing it may meet Ohio EPA's definition of a public water system. A public water system is one that regularly provides water to 25 or more people for 60 or more days a year. Ohio EPA regulates the installation, operation, testing, modification and closure of public water systems.

Contact your local Ohio EPA district office, Division of Drinking & Ground Waters for more information on well system requirements.

Storm Water

Many businesses have outside processes, storage units and/or material handling areas. Auto salvage yards typically have outdoor areas where salvage operations are conducted or materials are stored.



Storm water contacting these outdoor areas can carry pollutants such as heavy metals, oils and solvents directly to a stream, ditch, lake or other surface water. In 1987 the Clean Water Act was amended to include requirements for controlling storm water discharges at industrial sites. Even a small business may be subject to Ohio EPA's storm water regulations.

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

Under the storm water regulations, businesses are required to obtain a permit and develop a Storm Water Pollution Prevention Plan (SWPPP). The permit is called a National Pollution Discharge Elimination System (NPDES) permit and is issued through Ohio EPA's Division of Surface Water. Storm water permits usually include record keeping, spill reporting and monitoring requirements.

In the SWPPP, you must identify potential activities at your business that may contaminate storm water. In addition, the plan must outline the practices that you will use to help prevent storm water from becoming contaminated and running off into surface waters.

Some of the best management practices to help reduce the possibility of pollution at your auto salvage yard may include:

- Removing gasoline from vehicles prior to storage onsite;
- Liberal use of drip pans in areas where fluids are collected and stored;
- Storing materials indoors or, if outdoors, under tarps or other covers;
- Proper spill protection around car-crusher equipment;
- Keeping disposal or recycling records for automotive fluids (oil, transmission fluid, antifreeze, etc.);
- Making sure that no fluids are disposed of onto the ground, into storm drains, or into septic systems or waterways; and
- Using spill containment devices and absorbent materials to prevent releases.

Some businesses can be exempt from the permitting requirements if they operate or make process changes to prevent storm water contamination (e.g., moving activities under a roof). Questions about this "no exposure" exemption from the permitting process can be discussed with Ohio EPA's Division of Surface Water.

For additional information on the storm water requirements, please contact your local Ohio EPA district office, Division of Surface Water.

Underground Storage Tanks

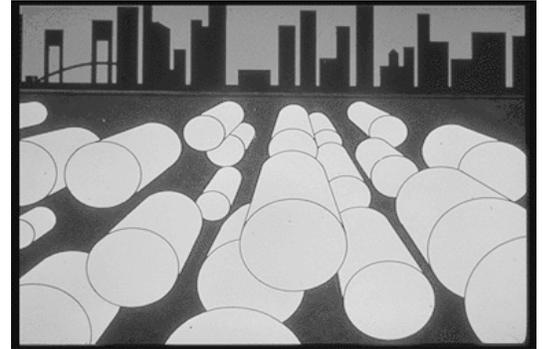
It is estimated that there have been about 1.1 million underground storage tanks (USTs) buried at over 400,000 sites nationwide. And, until the mid-1980s, most USTs were made of bare steel, which is likely to corrode and allow UST contents to leak into the environment over time.

Faulty installation or inadequate operation/maintenance can also cause USTs to leak. Potential hazards from leaking USTs include soil and groundwater contamination, fire and explosion. For these reasons, U.S. EPA established the UST regulations in the mid-1980s.

Companies 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 (BUSTR). A UST is a tank and any underground piping connected to the tank that has at least 10 percent of its combined volume underground. The UST regulations apply only to underground tanks and piping that store either petroleum or certain hazardous substances.

If you are use 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.

A company subject to the UST rules must ensure that underground tanks meet certain technical specifications. The technical regulations for USTs are designed to reduce the chance of releases. To meet the requirements, owners were required to upgrade, replace, or close existing UST systems by 1998. Tanks remaining in operation and any newly installed tanks are now 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 also 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.

For more information about the UST requirements, contact the Department of Commerce, State Fire Marshal's Office, Bureau of Underground Storage Tank Regulation (BUSTR) at (614) 752-7938.

Environmental Compliance Guide for Motor Vehicle Salvage Yards



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3232 Alum Creek Drive
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(614) 728-3778

Southeast District Office (SEDO)

2195 Front Street
Logan, Ohio 43138
(740) 385-8501

Southwest District Office (SWDO)

401 East 5th Street
Dayton, Ohio 45402
(937) 285-6357

Northeast District Office (NEDO)

2110 E. Aurora Road
Twinsburg, Ohio 44087
(330) 963-1200

Northwest District Office (NWDO)

347 N. Dunbridge Road
Bowling Green, Ohio 43402
(419) 352-8461

Ohio EPA
Small Business Assistance Office
3232 Alum Creek Drive
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www.epa.state.oh.us/other/sbao/sbaindex.html
