

AUTOMOTIVE SERVICE & REPAIR SECTOR
Self -Audit Compliance Assistance Checklist

Facility Name: _____

Address: _____

Contact: _____

Phone: _____

Facility Owner (if different from above) _____

Phone:(if different from above) _____

Date of Site Auditing: _____

Mark applicable Program(s) and write their corresponding ID number(s)

() RCRA EPA ID _____

() Water EPA ID _____

() Air EPA ID _____

This form is to be completed by the owner or administrator of the facility. This checklist is written in a way to serve as a self assessment tool.

Those questions indicating " see guidebook" refer to the Consolidated Screening Checklist for Automotive Repair Facility Guidebook-Document EPA 305-97-006 of December 1997 . This guidance can be obtained by e-mail from the Region's **Auto Repair & Service Sector Coordinator** at akhiles.luz@epa.gov or by calling (212) 637-4050.

*** If you circle an answer marked with an asterisk (*), this indicates that you are in possible violation of the regulations . You should promptly investigate the matter or request advice from EPA - Region II office for that program and made the proper correction.**

N.B.: YES or NO options that are in BOLD lead to follow-up questions .

1. WASTE MANAGEMENT

Waste Management

<p>1. Does your facility generate hazardous wastes? (See Table I on page 9) If NO, go to Question <u>10</u>, If YES, continue.</p>	<p align="center">Yes / No</p>
<p>2. Does your facility generate more than 100 kg (220lbs.) of hazardous waste per month? If NO, go to Question <u>5</u>, If YES, continue.</p>	<p align="center">Yes / No</p>
<p>3. Does your facility have an EPA RCRA ID number? If YES, what is it? _____</p>	<p align="center">Yes / No*</p>
<p>4. Do you maintain copies of hazardous waste manifests on-site for 3 years?</p>	<p align="center">Yes / No*</p>
<p>5. Are there containers or tanks that hold hazardous waste? If NO, go to Question <u>7</u> If YES, continue:</p>	<p align="center">Yes / No</p>
<p>a) Are the containers and/or tanks clearly marked with the words "Hazardous Waste," and are they marked with the accumulation start date?</p>	<p align="center">Yes / No*</p>
<p>b) Are all containers and/or tanks tightly closed and free from leakage?</p>	<p align="center">Yes / No*</p>
<p>c) Do <u>satellite accumulation areas</u> contain less than 55 gallons of accumulating wastes?</p>	<p align="center">Yes / No*</p>
<p>d) Are all full containers in <u>satellite accumulation areas</u> sealed and dated less than 3 days ago?</p>	<p align="center">Yes / No*</p>
<p>e) Do hazardous waste storage tanks have secondary containment (berm, vault, double walls)?</p>	<p align="center">Yes / No*</p>
<p>f) Does your facility store hazardous waste in containers or tanks longer than 90 days?</p>	<p align="center">Yes* / No</p>
<p>6. Does your facility accept hazardous waste for treatment, storage or disposal from off-site locations (including off-site facilities owned by the same company)?</p>	<p align="center">Yes* / No</p>
<p>7. Do your hazardous waste storage or treatment units (e.g., containers or tanks) appear to be poorly maintained or may otherwise release hazardous waste to the environment?</p>	<p align="center">Yes* / No</p>

8. Do chemicals or wastes appear to have been discharged to the environment through improper handling, leaks, spills, dumping or other discharges?

Yes* / No

1. WASTE MANAGEMENT cont...

Used Oil

9. Are used oil containers and piping leak free and labeled "used oil"?	Yes / No*
10. Are other hazardous waste fluids mixed with used oil? Please note used oil includes transmission and brake fluids. If YES , list types _____	Yes* / No
11. Did your facility have an oil spill within the last 12 months?	Yes* / No
12. Is heater's used-oil collected and sent off site for recycling, or burned in an on site ? If NO , how is it disposed of? _____	Yes/ No*
13. Does your facility accept household used oil? If NO , go to Question 14. If YES , continue:	Yes / No
a) Does the facility have the "do-it-yourself" sign a form stating that the substance is only used oil?	Yes/ No*
b) Does the facility test the used oil for contamination by either: <ul style="list-style-type: none"> • visually inspecting the oil for signs of antifreeze, solvent, or other substance that does not appear to be oil; or • using a sniffer, a hand held detector, that the facility places near the substances and indicates whether total halogens are higher than normal for used oil? 	Yes/ No*

Used Oil Filters

14. Are used oil filters completely drained before disposal?	Yes / No*
15. Are used oil filters terne-plated filters?	Yes* / No
16. How are used oil filters disposed (e.g., scrap metal, service, trash)? Note: If answer to Question 14 is NO or Question 15 is YES , then must be disposed as hazardous waste. Otherwise, can be disposed as normal solid waste, subject to town and county requirements. However, the most environmentally preferred method of disposal is to send to scrap metal yard for recycling.	

Used Anti-Freeze

17. Is used anti-freeze properly contained, segregated, and labeled?	Yes / No*
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18. Does your facility generate any antifreeze that is a hazardous waste?

Yes / No/do not know*

Note: Antifreeze would be considered hazardous if it is mixed with a hazardous waste such as solvent or gasoline. It could also be hazardous if it comes from an old car where antifreeze has been sitting for years and has picked up enough metals to be characterized as hazardous for metal content (>5 ppm lead) or if the PH > 12.5.

If **YES** or **Do Not Know**, continue. If **NO**, go to Question **23**.

1. WASTE MANAGEMENT cont...

Used Anti-freeze cont...

19. Is the used antifreeze recycled on-site in a closed loop system?

Yes/No*

In other words, the antifreeze is recycled by a recycling machine that connects directly to the car's radiator, recycles the antifreeze, and puts it right back into the same car that it came from. A similar system that connects to used antifreeze storage drums is not considered a closed loop system.

If **NO**, continue. If **YES**, go to Question **21**.

20. Is the used antifreeze counted toward facility generator status?

Yes/No*

21. How does your facility dispose of its antifreeze (e.g., recycled on-site, recycled off site, landfill)?

Used Solvents

22. Does your facility use solvents ? If **NO**, go to Question **27**. If **YES**, continue.

Yes/No

23. Are used solvents stored in containers that are compatible with the substance they are storing, have no signs of leaks or damage due to major dents or rust, and are closed (lids are on, caps are screwed on tight) except when actually adding or removing liquid?

Yes / No*

24. What types of solvents are used?

25. Are containers labeled "used solvents" or do they show the chemical name of the solvent? Note: Solvents that are being used in parts washers are not required to be labeled.

Yes/No*

26. How are used solvents disposed (e.g., service, mixed with other fluids)?

Batteries

27. How are used automotive batteries disposed (e.g., returned to the battery supplier, sent to recycling facility, sent to hazardous waste landfill) ? If none applicable go to Question **29**.

<p>28. Are batteries physically or chemically treated on-site prior to disposal? If YES, need to be treated as hazardous waste.</p>	<p>Yes*/No</p>
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1. WASTE MANAGEMENT cont...

Batteries cont...

<p>29. Are used batteries contained and covered prior to disposal?</p> <p>Batteries must be stored inside or outside under a tarp or roof and if inside, must be stored in a pan or other device, so that any leakage does not enter floor drains. In addition, batteries stored outside should be stored on impermeable surfaces such as concrete and have secondary containment.</p>	<p>Yes / No*</p>
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Rags

<p>30. How are used rags and towels disposed? (e.g., laundry service, burned for heat, trash)?</p>	
<p>31. How are used rags stored while on-site (e.g., in a container or on a shelf/bench that only contains rags, in a can/dumpster that contains all shop wastes, or on the floor in a pile or simply scattered)?</p>	

Tires

<p>32. Does your facility change tires ? If yes, how are used tires disposed (e.g., resold, recycled, sent to landfill, returned to customer)?</p>	
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Absorbents

<p>33. Does your facility use sawdust or other absorbent for spills or leaks? If NO, go to Next Section. If YES, continue.</p>	<p>Yes / No</p>
<p>34. Does your facility determine whether used absorbents are considered hazardous before disposal?</p>	<p>Yes / No*</p>
<p>35. How are absorbents used for oil spills disposed (e.g., burned for onsite heat, disposed as hazardous waste, characterized as nonhazardous and landfilled)?</p>	

2. WASTEWATER MANAGEMENT

<p>1. How does your facility clean the shop floor and surrounding area (e.g., uses “dry methods” such as dry mop, broom, rags, etc. or uses a hose or wet mop)?</p>	
<p>2. Are fluids (oil, antifreeze, solvent) allowed to enter floor drains for disposal? If NO, go to Question 3. If YES, continue:</p> <p>a. Where does each drain discharge to? b. What types of fluid enter drains? c. Is there evidence that contaminants entered drain? (e.g., discolored or smelly fluid; stained drain or floor nearby)</p>	<p>Yes* / No</p>
<p>3. How are fluids disposed ? (Circle as applicable)</p> <p>a. To a receiving stream/surface water body (or onto ground near enough to impact one)? If YES, identify the water bodies.</p> <p>b. To a sanitary sewer system that discharges to a municipal treatment plant (POTW) ?If YES, identify the POTW.</p> <p>c. To a storm water sewer system? If YES, identify the sewer system.</p> <p>d. To a subsurface disposal system (septic system, dry well, cesspool, sinkhole)?</p> <p>e. Trucked offsite? If YES, where does it go?</p> <p>f. Onto ground surface (e.g., spray, discharge pipe, open trench, street)?</p>	
<p>4. If the fluids are discharged to municipal sanitary sewer, to storm water, or the street, has facility notified POTW about potential contamination in wastewater?</p>	<p>Yes / No *</p>
<p>5. If the fluids are discharged directly to surface waters or to underground injection wells, does the facility have a NPDES or UIC permit. If YES, ask for permit numbers _____</p>	<p>Yes/No*</p>
<p>6. Does your facility store parts, fluids and/or other materials outside? If NO, go to Question 8. If YES, continue.</p>	<p>Yes / No</p>
<p>7. Are materials protected from rain/snow in sealed containers or under tarp or roof? Please note dumpsters need to be closed and sealed to the extent that water will not enter or exit them.</p>	<p>Yes / No*</p>

8. Does your facility have its own potable water supply?	Yes / No
If YES , does the facility provide potable water for 25 or more persons?	Yes/No
If so, is the water analyzed for contaminants & results reported to the state?	Yes/No*

3. AIR POLLUTION CONTROL

Parts Cleaners

1. Does your facility have a parts cleaner? If NO , go to question <u>3</u> . if YES , continue.	Yes/No
2. Are sinks kept closed and sealed except when actually cleaning parts?	Yes/No*
3. Does your facility use parts-cleaning sinks with halogenated solvents? If NO , go Question <u>8</u> , if YES , continue. Please Note: Halogenated Solvents are solvents containing greater than 5% concentration of any of the following: methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, chloroform, carbon tetrachloride.	Yes*/No See attachments on Aqueous Part Cleaning
4. What type of parts cleaner do you have? (e.g., batch cold, batch vapor or in-line)?	
5. Have you submitted a notification report and compliance report to EPA?	Yes / No* See attachments for Notification form
6. If it is a batch cold cleaner, does the facility follow the required work and operational practices?	Yes / No* IF batch cold See attachments for Notification form If batch vapor is in-line , Obtain copy of guidance document by calling
7. If batch vapor or in-line, has the facility been filing excess emission reports and annual reports and following one of the three compliance options.	Yes / No* Obtain copy of guidance document calling Air program (see contacts' list)

Motor Vehicle Air Conditioning (MVAC)

8. Does your facility service MVAC ? If NO , go to Question <u>17</u> . If YES , continue.	Yes / No
9. List all the refrigerants that the facility uses.	
10. Are the refrigerants other than CFC-12 listed above " acceptable subject to use condition" under EPA's Significant New Alternatives Policy (SNAP) ? If NO , which ones are not.	Yes / No* Go to page 9 for website address on list of approved refrigerant
11. Does your facility have a refrigerant identifier ? Please Note: This is not a requirement but highly recommended to prevent cross contamination.	Yes/No Go to page 9 for website address on the ABC of Handling Contaminated or Unfamiliar Refrigerant"

3. AIR POLLUTION CONTROL cont...

Motor Vehicle Air Conditioning (MVAC)

<p>12. Does your facility have a piece of approved recycling/recovery equipment and/or recovery only equipment dedicated to <u>each</u> of the refrigerants listed in Question 9?</p>	<p style="text-align: center;">Yes/No* Go to page 9 for website address on List of approved equipment</p>
<p>13. For recovery-only equipment, is refrigerant recycled on-site, or reclaimed off-site by an approved reclaimer ?</p>	<p style="text-align: center;">Yes/ No* / N/A Go to page 9 for website address on list of approved reclaimers</p>
<p>14. Has your facility submitted to EPA the equipment certification form?</p>	<p style="text-align: center;">Yes/No* Go to page 12 for copy of Certification form</p>
<p>15. Are MVAC technicians trained and certified by an accredited program?</p>	<p style="text-align: center;">Yes/No* Go to page 9 for website address on List of approved programs</p>
<p>16. Does your facility perform MVAC retrofits? If NO, go to Question 17. If YES, does the facility have in stock the following for each refrigerant listed in Question 9?</p> <p>Unique Service Fittings Permanent Labels Barrier Hoses (required only for blends that contain R-22) Compressor Shutoff Switch (required only for A/C systems that include a high-pressure cut-off switch)</p>	<p style="text-align: center;">Yes/No</p> <p style="text-align: center;">Yes/No* Yes/No* Yes/ No*/ N/A Yes/No* Go to page 9 for pdf location on Retrofit procedures</p>

Catalytic Converters (CC's)

<p>17. Does your facility replace CCs? If NO, go to Question <u>22</u> . if YES, continue.</p>	<p style="text-align: center;">Yes/No</p>
<p>18. Does your facility replace CC's that are the correct type based on vehicle requirements?</p>	<p style="text-align: center;">Yes / No*</p>
<p>19. Does your facility replace CC's on vehicles covered under original manufacturer's warranty <u>only</u> in cases where original CC is missing or with authorization from the state or local vehicle/emission inspection program?</p>	<p style="text-align: center;">Yes / No*</p>
<p>20. Does your facility properly mark and keep replaced CC's on-site for at least 15 days ?</p> <p>Note: Properly marked means the facility wrote the work invoice number or the date of removal and the customer's name on the removed converter or attached a copy of the work invoice to the removed converter.</p>	<p style="text-align: center;">Yes / No*</p>

<p>21. Does your facility completely fill out customer paperwork and maintain on-site for at least 6 months?</p> <p>Note: Work invoices must include customer's name and address, vehicle's make, model year, and mileage, and reason for replacement (damaged, clogged, missing). In addition, the warranty card must be filled out completely and attached to work invoice.</p>	<p>Yes / No*</p>
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3. AIR POLLUTION CONTROL cont...	
Fuels	
<p>22. Does your facility dispense fuels? If No, go to Question <u>29</u>. If Yes, continue.</p>	<p>Yes/No</p>
<p>23. Is Stage I vapor recovery equipment operated properly during unloading of gasoline?</p> <p>Note: Only applicable if facility located within a ozone non-attainment area.</p>	<p>Yes / No* / N/A For Info on non-attainment areas See list of Program contacts</p>
<p>24. Is Stage II vapor recovery equipment installed and working at pumps?</p> <p>Note: Only applicable if facility located within a serious or above ozone non-attainment area. Stage II vapor recovery can be recognized by the "black boots" on the gasoline nozzles and black hoses extending to the upper fuel pump canopies at dispensing stations.</p>	<p>Yes / No* / N/A For info on non-attainment areas See list of Program contacts</p>
<p>25. Do your fuel delivery records indicate compliance with appropriate fuel requirements?</p> <p>Note: If facility is located in an ozone non-attainment area, the fuel delivery ticket should say "RFG" or reformulated gasoline and if facility dispenses diesel to on-road vehicles, the diesel fuel delivery ticket must say "Low Sulfur".</p>	<p>Yes / No* / records unavailable*</p>
<p>26. Are pumps clearly labeled to indicate a description of the product (gasoline, diesel, kerosene), product grade (regular, mid-grade, premium) and octane (86, 87, 89, 91, 92, 93) that is being dispensed from that nozzle?</p>	<p>Yes / No*</p>
<p>27. Do the gasoline pump nozzles comply with 10 gallon per minute flow rate?</p>	<p>Yes / No* / don't know*</p>
<p>28. Is dyed, high-sulfur diesel/kerosene available for sale to motor vehicles used on the road?</p> <p>Note: High-sulfur diesel dispensing pumps should be locked or in a location where diesel on-road vehicles can not pull-up and fill-up with high-sulfur diesel.</p>	<p>Yes* / No</p>

Paints and Thinners	
29. Does your facility conduct painting? If NO , go to Section 4 . If YES , continue.	Yes/No
30. Are paints and thinners stored in containers that are labeled with the contents of the container, are closed with lids tight when not in use, and contained in such a way that a spill would not reach a drain or otherwise leave the facility?	Yes / No*
31. Does your facility use low VOC paints (e.g., VOC content is less than 5 lbs/gallon)?	Yes / No*
32. Does your facility determine whether paints are considered hazardous before disposal?	Yes / No*
3. AIR POLLUTION CONTROL cont...	
Paints and Thinners cont...	
33. How are used paints, thinners and solvents disposed? a. given away to customers, employees, or at "paint swaps" for reuse b. recycled by a paint, solvent or thinner recycler; c. mixed with other fluids, such as new solvent or used oil d. disposed at the municipal or hazardous waste landfill	
34. Does your facility mix paint amounts according to need and use new "high transfer efficiency" spray applications? Note: High efficiency sprayers are usually labeled HVLP on the gun.	Yes / No*
35. If hazardous paints are used, are spray paint booth air filters disposed properly as hazardous waste?	Yes / No
36. If filters are not hazardous, how are they disposed (e.g., recycled, landfilled)?	

MVAC Section -- Website/PDF documentations

1. **Choosing and Using Alternative Refrigerants for Motor Vehicle Air Conditioning-**
<http://www.epa.gov/ozone/title6/snap/macssubs.html>
2. **Halogen Solvent Cleaner NESHAP-Initial Notification Report- pdf**
3. **Batch Cold Cleaning Machine Work Practices-pdf**
4. **Lists of Substitutes for Ozone-Depleting Substances -**
<http://www.epa.gov/ozone/title6/snap/lists/index.html>
5. **MVAC Refrigerants Fittings & Label Colors List-**
<http://www.epa.gov/ozone/title6/snap/fittlist.html>

- 6. **The ABC's of Handling Contaminated and Unfamiliar Automotive Refrigerants-**
<http://www.epa.gov/ozone/title6/609/contamin.html>
- 7. **List of Section 609-Approved Equipment-**
<http://www.epa.gov/ozone/title6/609/appequip.html>
- 8. **List of EPA- Certified Refrigerant Reclaimers-**
<http://www.epa.gov/ozone/title6/608/reclist.html>
- 9. **MVAC Recover/Recycle or Recover Equipment Certification Form -pdf**
- 10. **Approved Technician Certification Program-**
<http://www.epa.gov/ozone/title6/609/609CERTS.html>
- 11. **Compressor Replacement in Automaker Retrofit Procedures-**
<http://www.epa.gov/ozone/title6/609/oemretro.html>

4. UST/SPCC/EMERGENCY SPILL PROCEDURES	
Underground Storage Tanks (USTs)	
1. Does your facility have USTs on site? If NO , go to Question <u>11</u> . If YES , continue Note: USTs are defined as one or a combination of tanks (including connected underground pipes) that are used to contain petroleum products or CERCLA hazardous substances where the total volume is 10% or more beneath the surface of the ground (including volume in connecting pipes).	Yes/No
2. Do all USTs store fuel oil for on-site heating? If NO , continue. If YES , tanks are exempt. Go to Question <u>11</u> .	Yes/No
3. For each UST, record its size in gallons and the petroleum product or hazardous substance it contains.	
4. Has the State UST program been notified of any USTs located on-site?	Yes / No* Contact your local/ state UST Program contact

<p>5. Does your facility conduct monthly leak detection for tank and piping of all on-site UST systems? If YES, circle method used.</p> <p>a. automatic tank gauging b. vapor monitoring c. interstitial monitoring d. groundwater monitoring e. statistical inventory reconciliation f. tank tightness testing every 5 years with inventory control (for tanks upgraded/installed <10 years ago) g. manual tank gauging only (for <=1000 gallon tanks) h. manual tank gauging and tank tightness testing every 5 years (for <=2000 gallon tanks which were upgraded/installed < 10 years ago)</p> <p>Please note: methods f, g, and h do NOT apply to piping. However, can use annual line testing instead of methods a-e.</p>	<p>Yes / No*</p> <p>Obtain copy of EPA Straight Talks on Tanks (EPA Doc No.- 510-K-95-003) Obtain copy of guidance document by calling UST program (see contacts' list)</p>
<p>6. Does the pressurized piping have an automatic flow restrictor, an automatic shutoff device or a continuous alarm system installed?</p>	<p>Yes/No* Same as above</p>
<p>7. Do USTs at the facility meet requirements for spill, overfill and corrosion protection?</p>	<p>Yes / No* Same as above</p>
<p>8. Is there evidence of UST leakage/spillage?</p>	<p>Yes*/ No Same as above</p>
<p>9. Did your facility have an oil spill within the last 12 months?</p>	<p>Yes* / No</p>
<p>10. Are records and documentation readily available (as applicable) for installation, leak detection, corrosion protection, spill/overfill protection, corrective action, financial responsibility, and closure?</p>	<p>Yes / No* Same as Question 5</p>
<p>4. UST/SPCC/EMERGENCY SPILL PROCEDURES</p>	
<p>Spill & Emergency Response</p>	
<p>11. Does facility have a gasoline, fuel oil, or lubricating oil storage <u>capacity</u> total greater than 1,320 gallons (or greater than 660 gallons in any one tank) in above ground tanks or total underground tank storage capacity greater than 42,000 gallons? If NO, stop. If YES, continue.</p> <p>Please note that capacity includes amount of substance that could be contained in tank and not what is stored in tank currently. In addition, includes all storage containers on site including drums and buckets.</p>	<p>Yes / No</p>
<p>12. Could spilled gasoline, fuel oil, or lubricating oil conceivably reach navigable waters? If NO, stop. If YES, continue.</p> <p>Note: If a spill could get to ground water, storm water, a creek, etc. it is considered to be able to “conceivably” reach navigable waters even if man-made structures (e.g., dikes, berms, storage containers) are present.</p>	<p>Yes / No</p>

<p>13. Does your facility have a "Spill Prevention Control and Countermeasures Plan" (SPCC) signed by a Professional Engineer?</p> <p>Note: This is not the same as a "hazardous materials plan" or an "emergency response plan". However, the SPCC plan may be combined with other plans. If this is done the combined plan should include wording such as "spill control and emergency response plan"</p>	<p>Yes / No*</p>
<p>14. Are phone numbers of the national, state and local emergency contacts available on site for immediate reporting of oil or chemical spills?</p> <p>Note: National Response Center is 1-800-424-8802.</p>	<p>Yes / No*</p>

Automotive Repair & Maintenance Facility Checklist

In case you observe any serious or criminal violations where amnesty does not apply please refer to the proper program contact as listed below.

PROGRAM CONTACTS

Program or Office	Contact
Air Compliance Program (incl. CFCs, but not Asbestos): -Asbestos (AHERA & NESHAP)	Karl Mangels 212-637-4078 Robert Fitzpatrick -4042
RCRA Compliance Branch:	Joel Golumbek (212) 637-4140
NPDES/Pretreatment/Storm Water/Underground Inj.Control	Frank Brock (212)-637-3762
CloroFluoroCarbon (CFC)	Doug McKenna (212)637-4244
Toxic Subst.Control Act/EPCRA	Dan Kraft (732) 321-6669
Underground Storage Tanks:	John Kushwara (212) 637-4232
Public Water Supply:	Kathleen Malone (212) 637-4083
Federal Facilities:	Kathleen Malone (212)637-3492
Spill Prevention Control & Countermeasure Plan (SPCC)	Bruce Sprague (732) 321-6656
SPCC /FRP:	Doug Kodama 732-906-6905
Pollution Prevention	Kathleen Malone 212-637-4083
Small Business	John Wilk (212) 637-3918
Caribbean Env. Prot. Div./Enf. Superfund Branch: Superfund Branch: Env. Mngt. Branch:	Carlos O'Neill (787) 729-6951(x230) Victor Trinidad (787)729-6951(x226)