

Self-certification Checklist for Auto body Refinishing Shops

This checklist is a tool to help **auto body refinishing shops that spray apply paints and coatings**. Auto body shops may be affected by the new US Environmental Protection Agency (EPA) rule for Paint Stripping and Miscellaneous Surface Coating Operations, often called the EPA auto body rule (also known as 6H or the federal NESHAP). The goal of the EPA auto body rule is to limit emissions of **six air pollutants**—cadmium, chromium, lead, manganese, nickel, and methylene chloride—that are hazardous to human health.

This checklist will also address some basic rules within your state that regulate air pollution, waste management, wastewater disposal requirements and best management practices for small shops.

Do you know if your shop is affected by the new EPA regulation?

Most auto body shops that paint vehicles or components of vehicles are subject to the rule requirements.

- If your shop does **not** spray apply paints or coatings or use any chemical paint strippers, this rule does not apply to your operation. Please contact us so we can correct our records. Contact information for your state's Small Business Environmental Assistance Program is on this sheet.
- If your shop **only** applies coatings with spray guns that have a cup size of 3 ounces or less, the EPA auto body rule may not apply to your painting operations. (Caution: 3 ounces is not very much! It's about half of a small coffee cup.)
- If your shop uses **any** chemical paint strippers that contain methylene chloride as an ingredient, you may be affected by the paint stripping requirements in this rule even if you do not spray paint.

The EPA auto body rule does contain some provisions for exemptions. Shops using **only** coatings that **do not** contain cadmium, chromium, lead, manganese, or nickel are not subject to the spray coating requirements of the rule **if** they have been granted an exemption from the EPA. If you have not received a letter from EPA approving an exemption, your shop is **not exempt**, even if you do not use any coatings containing the hazardous air pollutants. For more information on petitioning for an exemption, go to <http://www.epa.gov/collisionrepair/pdfs/petitionforexemption.pdf>.

How should you use this packet? The packet is divided into two parts:

- Self-certification checklist
- Notification of Compliance Status form

The self-certification checklist will help you review the rule requirements and your shop operations, and the Notification of Compliance Status form will help you meet the reporting requirements of the EPA auto body rule.

Complete the self-certification checklist first. It will allow you to evaluate your shop operations and determine whether your shop complies with the requirements of the EPA auto body rule. It also will give you the information you'll need for completing the Notification of Compliance Status. **Send the original signed copy of the checklist to Wisconsin's Small Business Environmental Assistance Program before March 11, 2011 (see mailing address below). Make sure to keep a copy for your files.**

| For questions: | Submit final checklist: |
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| Minnesota Small Business Environmental Assistance Program 520 Lafayette Rd N St Paul, MN 55115-4194 651-282-6143 or 800-657-3938 | WI SBCAAP - 5 th Floor Department of Commerce PO Box 7970 Madison, WI 53707-7970 or online ¹ at: http://commerce.wi.gov/bd/BD-CA-AutobodyShopComptraining.html |

After you've worked through the checklist, you'll be ready to complete the Notification of Compliance Status form. All auto body shops that are affected by the federal rule are required to submit this form. The form and instructions are included at the end of this booklet. **Send original signed copies of the Notification to EPA, and your state if required, by March 11, 2011 (mailing addresses are listed on the form). Make sure to keep a copy for your files.**

If you have already submitted your Notification of Compliance Status, or if you submitted a Petition for Exemption that was approved by EPA, you should still complete and submit this checklist. It will help you evaluate and determine whether your shop meets all applicable requirements and uses best management practices. Best management practices protect your employees, reduce your risk and liability, and save money by reducing the amount of supplies you need to purchase and the waste you must manage.

¹ If you submit your response to the checklist online, you still must submit the Notification of Compliance Status as indicated on that form.

Checklist Instructions:

This checklist is organized in sections, containing questions on the following areas of your shop’s operation:

- EPA Auto body Rule
 - General information
 - Spray guns
 - Spray booths and prep stations
 - Training
 - Paint removal/stripping
 - Documentation, recordkeeping and reporting
- State Rules
 - Air Pollution/VOCs
 - Waste management
 - Wastewater
- Best Management Practices
 - Pollution prevention
 - Energy efficiency

The questions in the checklist are worded so that answering “Yes” means your shop is likely to be in compliance with requirements and answering “No” means you might have a compliance problem that you should investigate further and correct if needed.

At the end of the checklist, we have included a copy of the Notification of Compliance Status form. The deadline for submitting this form is March 11, 2011. If you have not submitted it already, complete this form, make a copy for your records, and send it to EPA, and your state environmental agency, at the address(es) provided on the form. Some states do not require the form be submitted.

If you have any questions about this checklist or the Notification of Compliance Status form, or would like free, confidential compliance assistance, please contact your state’s Small Business Environmental Assistance Program at the phone number or email listed on the first page.

Basic Facility Information (Required)

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| Facility Name | |
| Facility Address | |
| Facility County | |
| Name of Person Completing Form | |
| Telephone Number of Person Completing Form | |
| Facility Owner/Manager Name | |

| General Information | Tips and Help Answering the Questions |
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| <p>1. Which of the following categories best describes your role at this shop? <i>(mark all that apply)</i></p> <p><input type="checkbox"/> Owner <input type="checkbox"/> Manager <input type="checkbox"/> Technician who applies spray coatings <input type="checkbox"/> Another role <i>(specify)</i> _____</p> | |
| <p>2. What type of services does your shop provide? <i>(mark all that apply)</i></p> <p><input type="checkbox"/> Auto mechanical repair <input type="checkbox"/> Salvage yard <input type="checkbox"/> Auto body shop <input type="checkbox"/> Car dealership <input type="checkbox"/> Mobile paint service <input type="checkbox"/> Car wash <input type="checkbox"/> Other (explain): _____</p> | |
| <p>3. How many employees and paint technicians (or anyone who may paint) do you have in your shop?</p> <p><input type="checkbox"/> # employees (total at shop) <input type="checkbox"/> # paint technicians</p> | <p># employees means total for shop, including owner/manager and office staff</p> <p># paint technicians includes spraying primers</p> <p>Count all employees, including part-time workers.</p> |
| <p>4. Does your shop use – check one in each row:</p> <p>Water-based paints: <input type="checkbox"/> Only <input type="checkbox"/> Some <input type="checkbox"/> None</p> <p>Water-based primers: <input type="checkbox"/> Only <input type="checkbox"/> Some <input type="checkbox"/> None</p> <p>Water-based cleaning solvents: <input type="checkbox"/> Only <input type="checkbox"/> Some <input type="checkbox"/> None</p> | <p>Water-based products are often described as those with VOC (volatile organic compounds) content of less than 2 lb VOC/gal. To determine the VOC content of your paints, primers, and solvents, check the MSDS. The section on physical properties (frequently Section 9) will often list the VOC. You can also ask your supplier if your coatings are considered water-based.</p> |

| General Information | Tips and Help Answering the Questions |
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| <p>5. Do any of the primers, base coats, clear coats, or other coatings used at your shop contain any of these ingredients or compounds including at least one of these? <i>Note that there are specific target concentrations for each ingredient or compound, which are listed in parentheses. Check all that apply:</i></p> <p><input type="checkbox"/> Cadmium (greater than 0.1% by weight)</p> <p><input type="checkbox"/> Chromium (greater than 0.1%)</p> <p><input type="checkbox"/> Lead (greater than 0.1%)</p> <p><input type="checkbox"/> Manganese (greater than 1%)</p> <p><input type="checkbox"/> Nickel (greater than 0.1%)</p> <p><input type="checkbox"/> None of the paints and coatings used at my shop contain any of the above ingredients.</p> <p><input type="checkbox"/> I do not know if my paints contain these ingredients, but will assume they do and comply with the rule.</p> <p>NOTE: If you can answer “None” above, then you may be eligible to petition EPA for an exemption to the spray painting portion of the EPA auto body rule (6H or the NESHAP). If you submit a petition for exemption, you MUST receive an approval letter from EPA to avoid having to comply with the requirements that follow in this checklist.</p> <p>Comply with the requirements of the rule, including the submittal of the Notification of Compliance Status form to EPA if you have not received an approved petition prior to March 11, 2011.</p> | <p>These five metals—cadmium, chromium, lead, manganese and nickel—have been identified as Hazardous Air Pollutants, and a goal of the EPA auto body rule is to reduce emissions of these compounds. Compounds with at least one ingredient can include Lead Chromate, Nickel Chromate, or similar mixtures.</p> <p>Typical uses in auto body paints and coatings:</p> <ul style="list-style-type: none"> • Lead and/or chromate are often found in red, orange, and yellow pigments. • Cadmium is often found in blue and green pigments. • Primer can contain chromium or lead for corrosion resistance. <p>You can refer to lists prepared by the major paint manufacturers that list their product codes for those paints and coatings that include at least one of these regulated materials on this web page:</p> <p>http://www.smallbiz-enviroweb.org/Compliance/NewRules/PaintStripping.aspx</p> <p>Click on “Paint Manufacturing/Petition for Exemption Resources” and then select the links for the appropriate manufacturer of the paint lines you use.</p> <p>Keep a current file of MSDSs for all the coatings and cleaning solvents used at your shop available on-site.</p> |

| General Information | Tips and Help Answering the Questions |
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| <p>6. Are you aware of your state’s Small Business Environmental Assistance Program and its free, confidential, non-regulatory compliance assistance services?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Don’t know</p> <p><input type="checkbox"/> I would like more information on how to obtain free, non-regulatory compliance help – please contact me.</p> | <p>The contact information for your state’s SBEAP office is on the first page of this checklist.</p> |
| <p>7A. How do you prefer to receive regulatory information? <i>(check all that apply)</i></p> <p><input type="checkbox"/> Mailing/written materials</p> <p><input type="checkbox"/> Videos – training or “fact sheets”</p> <p><input type="checkbox"/> E-mail messages/documents</p> <p><input type="checkbox"/> Web training</p> <p><input type="checkbox"/> Web site</p> <p><input type="checkbox"/> Facebook/twitter/YouTube</p> <p><input type="checkbox"/> On site visit</p> <p><input type="checkbox"/> Training sessions/workshops offered by suppliers</p> <p><input type="checkbox"/> Training sessions/workshops offered by state assistance program</p> <p><input type="checkbox"/> Other (specify: _____)</p> <p>7B. When do you prefer workshops to be held?</p> <p><input type="checkbox"/> During the day</p> <p><input type="checkbox"/> After work hours</p> | |

| EPA Rule - Spray Guns | Tips and Help Answering the Questions |
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| <p>This question applies to all spray guns used in your shop, including those that technicians own and use on site.</p> <p>8A. Are ALL spray guns at your shop HVLP, HVLP-equivalent, electrostatic, airless, or air-assisted airless?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>8B. If you answered YES, identify which gun(s) are used (check all that apply):</p> <p><input type="checkbox"/> HVLP <input type="checkbox"/> HVLP equivalent <input type="checkbox"/> Electrostatic <input type="checkbox"/> Airless <input type="checkbox"/> Air-assisted airless</p> | <p>The EPA auto body rule requires that only the spray gun types listed in 8A are used after January 10, 2011.</p> <p>“HVLP” is often stamped on the gun handle or cap. If not, contact your spray gun supplier to verify that the make/model is HVLP or HVLP equivalent, or look at purchase records or manuals.</p> <p>HVLP-equivalent means that you have documentation from the gun manufacturer or supplier that it has been approved by EPA.</p> <p>It is strongly recommended that you remove all non-compliant guns from your shop. Conventional guns are not compliant.</p> <p>For a list of HVLP approved or equivalent guns, go to one of these documents: HVLP: http://commerce.wi.gov/bd/docs/BD-R5ERP-HVLPgunlist.doc Equivalent: http://commerce.wi.gov/bd/docs/BD-R5ERP-HVLP-equivalentgunlist.doc</p> |
| <p>9A. Is all paint spray gun cleaning done with a fully enclosed spray gun washer or in a way that does not create a mist of solvent?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>9B. If you answered YES, identify which method(s) are used:</p> <p><input type="checkbox"/> Fully enclosed spray gun washer <input type="checkbox"/> Fully enclosed spray gun washer and occasionally disassemble and clean by hand <input type="checkbox"/> Flush with solvent (but don't spray) <input type="checkbox"/> Disassemble gun and clean by hand or mechanical methods</p> | <p>The EPA auto body rule requires that only the gun cleaning methods listed in 9A are used after January 10, 2011.</p> <p>If the gun is connected to the air compressor during cleaning and you spray solvent through the gun, it will create a mist, which is not compliant with the rule.</p> <p>Pouring solvent through the gun and letting it run out directly into a waste container would not create a mist, and would be acceptable under the rule.</p> |

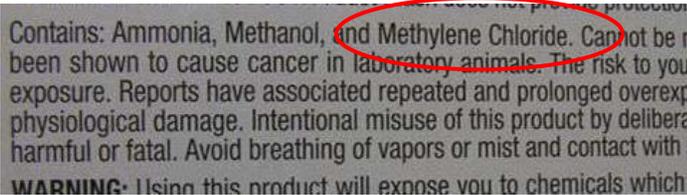
| EPA Rule - Spray Booths and Prep Stations | Tips and Help Answering the Questions |
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| <p>10. Does ALL spray coating (including priming) occur in a spray booth or prep station – never out on the shop floor or outdoors?</p> <p>___ Yes ___ No</p> | <p>The EPA auto body rule requires that all spray coating be done within a booth, as outlined in the following questions, after January 10, 2011.</p> |
| <p>11A. When applying a coating to a whole vehicle, or to a component that is still attached to the vehicle, does it ALWAYS occur in a spray booth or prep station that has 4 walls/curtains and a roof?</p> <p>___ Yes ___ No</p> <p>11B. How many spray booths or prep stations with 4 walls/curtains and a roof do you have? _____</p> | <p>The EPA auto body rule requires that when all or part of a vehicle is being painted, it must be contained within a four-wall booth after January 10, 2011.</p> <p>To meet the enclosure requirements, side curtains may be used in place of walls. Side curtains are typically installed on tracks, so they can be easily opened and closed. Side curtains need to extend from the floor to the roof without any gaps.</p> |
| <p>12A. When applying a coating to a component that IS removed from the vehicle, does it ALWAYS occur in a spray booth or prep station that has <u>at least</u> 3 walls/curtains and a roof?</p> <p>___ Yes ___ No</p> <p>12B. How many spray booths or prep stations with only 3 walls/curtains and a roof do you have? _____</p> | <p>The EPA auto body rule requires that when a part is removed from vehicle to be painted, it must be painted in a booth with at least three walls after January 10, 2011.</p> <p>To meet the enclosure requirements, side curtains may be used in place of walls. Side curtains are typically installed on tracks, so they can be easily opened and closed. Side curtains need to extend from the floor to the roof without any gaps.</p> |
| <p>13. Are ALL spray booths and prep stations ventilated with an exhaust fan?</p> <p>___ Yes ___ No</p> | <p>The EPA auto body rule requires that the above-mentioned booths have an exhaust that pulls air out of the booth after January 10, 2011.</p> |

| EPA Rule - Spray Booths and Prep Stations | Tips and Help Answering the Questions |
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| <p>14. Is each spray booth and prep station that has 4 walls</p> <ul style="list-style-type: none"> • ventilated at negative pressure, OR • ventilated at positive pressure with seals on all doors and openings, and an automatic pressure balancing system, and operated at no more than 0.05 inches water gauge positive pressure? <p>___ Yes ___ No</p> | <p>The EPA auto body rule requires that all four-wall booths be ventilated as indicated in #14 after January 10, 2011.</p> <p>Negative pressure means that air is drawn into the spray booth or prep station. Maintaining negative pressure requires: sufficient make-up air, proper filtration, and venting.</p> |
| <p>15. Is each spray booth and prep station that has 3 walls ventilated so that air is drawn into the booth?</p> <p>___ Yes ___ No ___ Not Applicable – we do not have any spray booths or prep stations with only 3 walls – they all have 4 walls</p> | <p>The EPA auto body rule requires that all three-wall booths be ventilated as indicated in #15 after January 10, 2011.</p> |
| <p>16. Do ALL spray booth and prep station exhaust systems have an overspray filter system?</p> <p>___ Yes ___ No</p> | <p>The EPA auto body rule requires that all booths be exhausted through either a dry filter system or waterwash booth after January 10, 2011.</p> |
| <p>17. Are spray booth and prep station exhaust/filter systems ALWAYS used when any spray painting (including priming) is done?</p> <p>___ Yes ___ No</p> | |
| <p>18. Is the filter capture efficiency rating of ALL dry filter systems at least 98 percent?</p> <p>___ Yes ___ No ___ Not applicable – we have a waterwash booth</p> | <p>The EPA auto body rule requires dry filters to be 98% efficient.</p> <p>Filter efficiency information would typically be found on the filter package or provided by the distributor. If you don't purchase filters directly, but go through a subcontractor instead, you may need to get in touch with them to get the info.</p> <p>The filter documentation provided on the package, or by your distributor or subcontractor, should identify that the filter has been tested consistent with ASHRAE method 52.1.</p> <p>If you don't know the filter efficiency or that ASHRAE method 52.1 was used to measure it, you must assume the answer to this question is "No".</p> |

| EPA Rule - Spray Booths and Prep Stations | Tips and Help Answering the Questions |
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| <p>19A. Do you have a procedure to determine when exhaust/filter systems need to be cleaned and maintained?</p> <p> <input type="checkbox"/> Yes <input type="checkbox"/> No </p> <p>19B. If you answered YES, how do you decide to when to change a filter?</p> <p> <input type="checkbox"/> set schedule (for example, same time each month) <input type="checkbox"/> pressure gauge reading <input type="checkbox"/> visual check of filter <input type="checkbox"/> other - please specify: _____ _____ _____ </p> | <p>There should always be good air flow within the spray booth/prep station so the exhaust/filter system captures all the paint spray, AND there should never be any paint staining outside the fan.</p> <p>A pressure gauge such as a manometer or magnehelic can be used to measure the pressure difference before and after the exhaust filters. As the filter collects more paint solids, this pressure difference increases. Different styles and brands of paint filters will reach their "change out" reading at varying rates depending on paint types, booth design, operator technique, fan speed, temperature, etc.</p> |

| EPA Rule - Training | Tips and Help Answering the Questions |
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| <p>20A. Have ALL your paint technicians attended a training specifically designed to cover the requirements of the new EPA auto body rule (known as 6H or the NESHAP)?</p> <p>___ Yes ___ No</p> <p>20B. If you answered YES, did the training contain both hands-on and classroom sessions?</p> <p>___ Yes ___ No</p> | <p>The EPA auto body rule requires that all painters receive training as described in the rule prior to January 10, 2011, and receive refresher training every five years after the initial training is complete.</p> <p>Many suppliers provide this training. Contact your supplier to see if they are offering trainings that meet this requirement.</p> <p>Technical Colleges may have added the EPA Rule training requirements to their curriculum in the past year or two, but do NOT assume recent graduates from a technical college have received the proper training. Review transcripts or obtain class descriptions for the year(s) the employee attended.</p> <p>The intent of the training requirements is to improve each painter's ability to apply coatings in a more efficient manner. Just having a painter hold a spray gun in their hands at the training will not achieve this goal. The hands-on portion of the training should include:</p> <ul style="list-style-type: none"> • Spray gun selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate. • Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including, maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke. |

| EPA Rule - Training | Tips and Help Answering the Questions |
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| <p>21. Did the training cover ALL of the following specific topics?</p> <p>___ Yes ___ No</p> <p>→ Spray Gun Selection and Set Up - including a hands-on component:</p> <ul style="list-style-type: none"> • measuring viscosity • selecting proper fluid nozzle or tip • achieving proper spray pattern • air pressure and volume • fluid delivery rate <p>→ Spray Gun Use – including a hands-on component – on spray technique to improve transfer efficiency and minimize coating usage and overspray, including:</p> <ul style="list-style-type: none"> • maintaining the correct spray gun distance and angle to the part • using proper banding and overlap • reducing lead and lag spraying at the beginning and end of each stroke <p>→ Spray Gun Maintenance – including an hands-on component: cleaning method must eliminate creating any solvent mist</p> <p>→ Spray Booth and Filter Maintenance - including filter selection and installation</p> <p>→ Description of requirements in the EPA auto body rule</p> | <p>To answer YES, the training MUST have covered ALL these elements. If any ONE is missing, it is not complete and should be supplemented to be sure it can be certified as complete.</p> |
| <p>22. Is the training for ALL technicians up-to-date?</p> <p>___ Yes ___ No</p> | <p>All new technicians must be trained within 180 days of hire and current technicians must be trained by January 10, 2011 – the compliance deadline listed in the rule.</p> <p>Existing technicians may use experience or previous training that meets the training criteria listed, but that must be documented and the owner must certify that the training was sufficient to meet the rule.</p> <p>All training received is only good for 5 years and a refresher course must be taken prior to the 5 year anniversary.</p> |

| EPA Rule - Paint Removal/Stripping | Tips and Help Answering the Questions |
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| <p>23. Is your shop exempt from the methylene chloride paint stripping requirements in the EPA auto body rule?</p> <p>___ This shop is exempt because:</p> <ul style="list-style-type: none"> • we do not use any chemical strippers (only mechanical methods like sanding), or • we have verified that the chemical strippers used in the shop do not contain Methylene Chloride. If exempt, skip to Question 28. <p>___ This shop is not exempt because we use a chemical stripper that contains Methylene Chloride. If not exempt, answer Questions 24-27.</p> | <p>The EPA auto body rule requires that use of methylene chloride to be minimized as much as possible after January 10, 2011. It is strongly recommended that you remove all chemicals containing methylene chloride from your shop, especially if you do not absolutely need them – they are a hazardous waste and must be disposed properly.</p> <p>Methylene Chloride is also known as di-chloromethane (DCM) or methylene dichloride (identified by CAS no. 75-09-2). Check the container label or the MSDS to verify whether any chemical paint strippers in your shop contain this compound.</p> <p>Some likely brands include: StripRDry, Booth Floor Stripper (both made by CMA Philadelphia); Airplane stripper.</p> |
| <p>24. Do you have records documenting the amount of paint stripping products containing Methylene Chloride your shop uses each year?</p> <p>___ Yes ___ No</p> <p>25. How much product containing Methylene Chloride does your shop use each year?</p> <p>_____ gallons per year</p> <p>26. Does your shop have a plan to reduce or eliminate the use of Methylene Chloride?</p> <p>___ Yes ___ No</p> <p>27. If your shop uses 2,000 pounds (~150 gallons) or more in a year, is your plan written and is it posted in the same location where the Methylene Chloride is used?</p> <p>___ Yes ___ No ___ Not applicable – we use less than 2,000 pounds per yr</p> |  <p>Methylene chloride may be abbreviated MeCl on labels or MSDS for products.</p> <p>Plan must:</p> <ul style="list-style-type: none"> • Evaluate need to remove paint • Evaluate each application for alternatives: (non- or low-; blasting; mechanical; thermo) • Reduce MeCl stripper exposure to air • Minimize evaporation during use • Ensure proper storage and disposal techniques |

| EPA Rule - Documentation, Recordkeeping and Reporting | Tips and Help Answering the Questions |
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| <p>28A. Have you submitted an Initial Notification for the EPA auto body rule as required?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>28B. If you answered YES, do you have a copy in your files and available for review?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> | <p>The Initial Notification was due on January 10, 2010. If you missed this deadline, you should send it in as soon as possible. You can find a form here:</p> <p>http://www.epa.gov/ttn/atw/area/paint_strip_example.doc</p> <p>The mailing address is listed on the form.</p> |
| <p>29. Do you have in your files and available for review the required documentation of the efficiency of the filters used to capture paint overspray?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable – we have a waterwash booth</p> | <p>Filter efficiency information would typically be found on the filter package or provided by the distributor. If you don't purchase filters directly, but go through a subcontractor instead, you may need to get in touch with them to get the documents.</p> <p>The filter documentation provided on the package, or by your distributor (or subcontractor) should identify that the filter has been tested consistent with ASHRAE method 52.1.</p> |
| <p>30A. Do you have records on the training each technician received in your files and available for review?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>30B. If you answered YES to 30A, has the shop owner and/or operator certified that the training each technician took meets the requirements of the EPA auto body rule?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>30C. If you answered YES to 30A, has the training for each technician occurred within the past 5 years?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> | <p>Records on file for each technician should include:</p> <ul style="list-style-type: none"> • name of technician, • certificate of training completion, • date(s) of training, • location of training, • training agenda. <p>The owner and/or operator of the shop must certify that the training met the requirements of the EPA auto body rule (also known as 6H or the NESHAP), and this signed certification should also be kept in the file.</p> |

| EPA Rule - Documentation, Recordkeeping and Reporting | Tips and Help Answering the Questions |
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| <p>31A. Do you have verification that all your spray guns are HVLP, HVLP-equivalent, electrostatic, airless, or air-assisted airless?</p> <p> <input type="checkbox"/> Yes <input type="checkbox"/> No </p> <p>31B. If YES, please describe the documentation available on the spray guns:</p> <p> <input type="checkbox"/> "HVLP" is stamped on every gun <input type="checkbox"/> documentation for every gun in my shop is in my files and available for review <input type="checkbox"/> "HVLP" is stamped on some guns and documentation is in my files for all the others </p> | <p>Documentation could include that "HVLP" is stamped on the gun, or you can use purchase records or manuals. If you don't have documentation for every gun, contact your spray gun supplier to get it.</p> <p>Note that HVLP-equivalent means that you have documentation from the gun manufacturer or supplier that it has been approved by USEPA.</p> <p>It is strongly recommended that you remove all non-compliant guns from your shop. Conventional guns are not compliant.</p> |
| <p>Congratulations on completing these initial sections of the self-certification checklist. You now have compiled the information needed to determine whether your shop meets the requirements of the EPA auto body rule.</p> <p>If you answered "Yes" to all the "Yes / No" questions above, your shop is in compliance with rule requirements. Submit your Notification of Compliance Status by March 11, 2011 to EPA and your state as indicated on the form. Make sure to keep a copy for your files!</p> <p>If you answered "No" to any "Yes / No" questions above, make any needed changes by January 10, 2011, and then submit the Notification of Compliance Status before the deadline.</p> <p>Continue on to the next sections of the checklist to complete your evaluation of your shop operations.</p> | <p>Your shop must be in compliance with all the requirements of the rule by January 11, 2011. Submit the Notification of Compliance Status by March 11, 2011.</p> <p>The Notification of Compliance Status form, along with instructions, is included at the end of this checklist. The form is also available online at http://commerce.wi.gov/bd/BD-CA-AutobodyShopComptraining.html</p> <p>If you are uncertain about what changes you need to make, or whether you are currently in compliance with any part of this regulation, please contact your local Small Business Environmental Assistance Program for help. Contact information is listed on the first page of this packet.</p> |

| State Rule – Air Permitting | Instructions and Tips |
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| <p>This section will help determine the need for an air emissions permit for auto body shops that spray coatings. Contact your state’s SBEAP to obtain further assistance.</p> | |
| <p>MN 1: Do you use more than 200 gallons or 2000 pounds of VOCs annually?</p> <p> <input type="checkbox"/> Yes <input type="checkbox"/> No </p> <p>If you use more than 200 gallons or 2000 pounds of VOCs annually, you may need an air permit.</p> | <p>Ask your coatings vendor for your VOC annual usage report. Double-check that only the VOC portion of each coating is counted toward the total, not the entire gallon of coating. Solvents and thinners are usually 100% VOC, so the entire gallon of solvents and thinners should be counted.</p> <p>More information is available in MPCA air quality fact sheet #5.13, “Air Quality Rules Affecting Auto Body Shops with Paint Spraying Equipment” at http://bit.ly/aq5-13</p> <p>After you have read through the fact sheet, if you determine that you qualify for an Option B Registration Permit, use these two forms to apply:</p> <ol style="list-style-type: none"> 1) Submittal Cover Page (SCP-01), available at http://bit.ly/SCP-01 2) Facility Information (RP-01), available at http://bit.ly/RP-01 <p>If you have questions, contact the Minnesota Small Business Environmental Assistance Program at the phone number listed on the first page of this checklist.</p> |

| State Rule - Waste Management | Instructions and Tips |
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| <p>The questions contained in this section are not exhaustive. They are meant to provide you with a basic understanding of hazardous waste requirements and whether your shop is in compliance. It is best to contact your SBEAP to obtain assistance on whether the hazardous waste generated at your shop is being handled properly.</p> | |
| <p>WM 1: Have you looked at all of the wastes your shop generates and determined which ones are considered hazardous wastes?</p> <p> <input type="checkbox"/> Yes <input type="checkbox"/> No </p> | <p>For more guidance on determining whether a waste is hazardous, refer to MPCA hazardous waste fact sheet #1.01, "Evaluate Waste, Determine Generator Size" at www.pca.state.mn.us/publications/w-hw1-01.pdf</p> |
| <p>WM 2A: Do you record the amount of hazardous waste that your business generates?</p> <p> <input type="checkbox"/> Yes <input type="checkbox"/> No </p> <p>WM 2B: What is the highest amount your shop generates in a month? _____</p> <p>Is the amount in pounds or gallons? <input type="checkbox"/> pounds <input type="checkbox"/> gallons</p> | <p>Document each waste stream and the weight of material generated (not shipped) per month for each waste stream, then add it all up.</p> <p>Do not include antifreeze that is recycled, used oil, or hazardous waste managed as universal waste. Wastes that may be managed as universal waste in Minnesota include batteries, fluorescent lights, and mercury-containing switches.</p> <p>Maintaining a running log of the amount of waste in a waste container at the beginning of each month or during your weekly inspections is an easy way to inventory the volume of waste generated.</p> <p><u>RULES OF THUMB FOR WASTE MEASUREMENTS:</u> <i>1 gallon = 10 pounds</i> <i>One-quarter of a 55-gallon drum = 110 pounds</i> <i>One 55-gallon drum = 440 pounds</i></p> |
| <p>WM 3: Does your shop generate NO MORE than 220 pounds (about half a drum) of hazardous waste in its busiest month?</p> <p> <input type="checkbox"/> Yes – I am a VSQG and never generate more than 220 pounds a month <input type="checkbox"/> No </p> <p>If NO, your shop is an SQG or LQG and must comply with additional requirements that are not included in this checklist. Skip questions WM4-WM7 and refer to Minnesota waste rules or MPCA hazardous waste fact sheets for hazardous waste requirements and guidance.</p> | <p>If your shop generates less than 220 pounds of hazardous waste in a month, the shop is a: <i>Very Small Quantity Generator (VSQG) = <220 lbs/month</i></p> <p>If your shop generates MORE than 220 pounds of hazardous waste in a month the shop is a: <i>Small Quantity Generator (SQG) = >220 – 2200 lbs/month (1/2 to 4 drums)</i> <i>Large Quantity Generator (LQG) = >2200 lbs/month (more than 4 drums)</i></p> <p>SQGs and LQGs have more regulatory requirements than this checklist covers. Contact your state SBEAP for more information.</p> <p>MN Rules: https://www.revisor.mn.gov/rules/?id=7045</p> <p>MPCA hazardous waste fact sheets: www.pca.state.mn.us/waste/pubs/business.html</p> |

| State Rule - Waste Management | Instructions and Tips |
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| <p>Questions WM4, WM5, WM6 and WM7 only apply if your shop is a VSQG, meaning it generates LESS than 220 pounds (about half a 55-gallon drum) of hazardous waste in a month. If your shop generates more, you have additional requirements.</p> | |
| <p>WM 4: Are ALL your hazardous wastes stored correctly as outlined below?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>To answer YES, you must be able to check off ALL actions required:</p> <p><input type="checkbox"/> All hazardous waste is stored in containers or tanks that are in good condition (i.e., free of severe rusting or apparent structural defects, and not leaking) and are compatible with the waste contained</p> <p><input type="checkbox"/> All hazardous waste is stored in a specified location that has a floor resistant to the waste and is protected from the weather</p> <p><input type="checkbox"/> All hazardous waste containers are kept closed unless waste is being added or removed</p> <p><input type="checkbox"/> There is sufficient aisle space for a person to walk between containers, and remove a leaking container without moving any other container</p> <p><input type="checkbox"/> Containers of incompatible materials are separated by a dike, berm, secondary containment, or distance</p> <p><input type="checkbox"/> Labels are legible and visible</p> <p><input type="checkbox"/> Storage area and containers are inspected and documented weekly</p> | <p>Refer to MPCA hazardous waste fact sheet #1.04/1.05, "Label and Store Hazardous Waste" at www.pca.state.mn.us/publications/w-hw1-04-05.pdf</p> <p>"Closed" means that if the containers were tipped, nothing would spill. Funnels are acceptable if they are closed and latched.</p> |
| <p>WM 5: Are ALL your hazardous waste containers properly labeled as outlined below?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>To answer YES, you must be able to check off ALL actions required:</p> <p><input type="checkbox"/> All hazardous waste containers are properly labeled with the words "hazardous waste"</p> <p><input type="checkbox"/> All drums are labeled with a clear description of the waste inside</p> <p><input type="checkbox"/> All drums are clearly marked with the date that waste was first put in the container</p> | <p>Example label:</p> <div data-bbox="1031 1029 1885 1318" style="border: 1px solid black; background-color: yellow; padding: 10px; text-align: center;"> <p><i>Hazardous Waste</i></p> <p>Description of Waste _____</p> <p>Start Date _____</p> </div> |

| State Rule - Waste Management | Instructions and Tips |
|--|---|
| <p>WM 6: Are you following the proper disposal methods for each of the wastes you generate?</p> <p> <input type="checkbox"/> Yes <input type="checkbox"/> No </p> <p>To answer YES, you must make sure your disposal methods are appropriate based on waste disposal guidance provided here: http://commerce.wi.gov/bd/BD-CA-AutobodyShopComptraining.html </p> | <p>Information that explains which disposal methods are allowed in Minnesota for wastes commonly found at auto body shops that generate less than 220 pounds (about ½ a 55-gallon drum) of hazardous waste in a month (VSQGs) can be found on the web page http://commerce.wi.gov/bd/BD-CA-AutobodyShopComptraining.html under the Minnesota heading.</p> |
| <p>WM 7: Do you have an employee training program that goes over proper hazardous waste management procedures?</p> <p> <input type="checkbox"/> Yes <input type="checkbox"/> No </p> | <p>Training is strongly suggested, but is not required for VSQGs in Minnesota. More information is available in MPCA hazardous waste fact sheet #1.09a, "Train Employees: Personnel training for Very Small Quantity Generators" at www.pca.state.mn.us/publications/w-hw1-09a.pdf</p> |

| Proper disposal methods for Minnesota auto body shops that generate less than 220 pounds (about 26 gallons) of hazardous waste in a month | | | | | | | | |
|---|--|---|--|--------------------------------|---|--|-----------------------|--|
| | Transported by licensed hauler for disposal or recycling | Self-transport to VSQG HW collection site | Burn in space heater | Distill or recycle at the shop | Discharge to sanitary sewer or transported to water treatment plant | Trash dumpster | Other allowed options | MPCA hazardous waste fact sheets with more information ¹ |
| Paint waste, including solvent | OK | OK | not allowed | OK | not allowed | not allowed | | #4.40 "Paint and Ink Wastes" |
| Still bottoms | OK | OK | not allowed | not allowed | not allowed | not allowed | | |
| Rags | OK | OK | not allowed | not allowed | not allowed | not allowed | Laundering | |
| Paper towels | OK | OK | not allowed | not allowed | not allowed | OK if clean or if only hazardous contaminant is D001 or F003 flammable solvent | | #4.61 "Managing Towels, Wipes, and Sorbents" |
| Booth filters | OK | OK | not allowed | not allowed | not allowed | OK if tested to prove not hazardous | | #4.38 "Paint Booth Filters" |
| Oil filters | OK | OK | not allowed | not allowed | not allowed | not allowed | | #4.30 "Used Oil and Related Wastes, Management for Generators" |
| Used Oil | OK | OK | OK | not allowed | not allowed | not allowed | | |
| Antifreeze | OK | OK | not allowed | not allowed | OK if less than 600 gals/yr and get sewer authority approval | not allowed | | #4.02 "Managing Waste Antifreeze" |
| Fluorescent light bulbs | OK | OK | not allowed | not allowed | not allowed | not allowed | | #4.62 "Managing Universal Waste" |
| Electronic waste | OK | OK if they accept e-waste | not allowed | not allowed | not allowed | not allowed | | #4.15 "Managing Electronic Waste from Business Sources" |
| Batteries | OK | OK | not allowed | not allowed | not allowed | not allowed | | #4.05 "Managing Dry-cell Batteries, #4.06 "Lead-Acid Batteries, Requirements for Generators", and #4.62 "Managing Universal Waste" |
| MPCA hazardous waste fact sheet | #1.06 "Treat and Dispose of Hazardous Waste Correctly" | | #4.32 "Burning Used Oil" | | #4.49 "Sewering Liquid Waste" | | | |

¹Hazardous waste fact sheets are located at www.pca.state.mn.us/waste/pubs/business.html.

| State Rule - Wastewater | Instructions and Tips |
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| <p>The questions contained in this section are not exhaustive and are meant to provide you with a basic understanding of wastewater requirements and whether your shop is likely to be in compliance. They assume the wastewater is not considered hazardous, which should be handled properly under the hazardous waste rules. It is best to contact your SBEAP to obtain assistance on whether the wastewater generated at your shop is being handled properly.</p> | |
| <p>WW 1: Do you operate a 'dry' shop?</p> <p><input type="checkbox"/> Yes – Skip remaining WW questions.</p> <p><input type="checkbox"/> No – Answer the remaining questions in the wastewater section.</p> | <p>A dry shop is one where no water is used to rinse cars, parts, equipment, floors, or booths. Only rags/wipes (damp or dry), compressed air, brooms or similar techniques are used to clean vehicles and the shop.</p> |
| <p>WW2. In most cases, the only allowed ways to dispose of waste liquids from an autobody refinishing and repair shop is to send it to the local sewer, or to a holding tank that is later pumped and delivered to a local treatment plant. Directing those liquids to a storm drain, onto the ground, into a ditch, into septic systems or into unknown outlets are generally not allowed, or if they are it is only allowed by special permit from the state.</p> <p>Are you following only allowed discharge practices for your shop waste liquids?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>WW 2A. Which of your waste liquids are discharged to storm drain, onto the ground or into a ditch? Check all that apply.</p> <p><input type="checkbox"/> solvents</p> <p><input type="checkbox"/> oil/grease</p> <p><input type="checkbox"/> car wash</p> <p><input type="checkbox"/> antifreeze</p> <p><input type="checkbox"/> None</p> <p><input type="checkbox"/> other: _____</p> | <p>Discharging wastewater from facility operations to a ditch, ground, septic system, or storm sewer may be illegal or require a permit or authorization.</p> <p>You must know where all drains discharge. If you do not know for sure, you must assume that you have open floor drains when answering this question. Open floor drains with unknown outlets should not be allowed to empty out into storm drains, a septic system, or onto the ground.</p> <p>Check with your local municipality to find contact information for the local wastewater treatment plant or sewer authority in your area. Some state information may be listed here: http://commerce.wi.gov/bd/BD-CA-AutobodyShopComptraining.html</p> |

| State Rule - Wastewater | Instructions and Tips |
|--|--|
| <p>WW 2B. Which of your waste liquids are discharged to septic system? Check all that apply.</p> <p><input type="checkbox"/> solvents <input type="checkbox"/> oil/grease <input type="checkbox"/> car wash <input type="checkbox"/> antifreeze <input type="checkbox"/> None <input type="checkbox"/> other: _____</p> <p>WW 2C. Which of your waste liquids are discharged to an unknown outlet? Check all that apply.</p> <p><input type="checkbox"/> solvents <input type="checkbox"/> oil/grease <input type="checkbox"/> car wash <input type="checkbox"/> antifreeze <input type="checkbox"/> None <input type="checkbox"/> other: _____</p> <p>WW 2D. Which of your waste liquids are discharged to sewer (local wastewater treatment plant) or a holding tank whose contents are to be transferred to the treatment plant? Check all that apply.</p> <p><input type="checkbox"/> solvents <input type="checkbox"/> oil/grease <input type="checkbox"/> car wash <input type="checkbox"/> antifreeze <input type="checkbox"/> None <input type="checkbox"/> other: _____</p> | |
| <p>WW 3. If you checked anything besides "NONE" in WW 2A, B or C above, has your shop contacted the state environmental agency to determine if a permit or other authorization is required for any of those activities?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> | <p>Discharging wastewater from facility operations to a ditch, ground, septic system, or storm sewer may be illegal or require a permit or authorization. For permitting info, refer to MPCA water fact sheet #1.01, "Water-quality Permit Requirements for Wastewater Discharges to Ground Surface and Subsurface", at www.pca.state.mn.us/index.php?option=com_docman&task=doc_download&gid=11589&Itemid=</p> |

Best Management Practices in Pollution Prevention and Energy Efficiency

These practices are all voluntary. This checklist will help you evaluate your shop's progress toward pollution prevention, and will help us understand which practices are most widely used by auto body shops in the state.

| Pollution Prevention Practices | Instructions and Tips |
|--|-----------------------|
| <p>PP 1: Please check any of the following actions you have taken to reduce air emissions:</p> <p>a. Air Toxics</p> <ul style="list-style-type: none"> <input type="checkbox"/> Keep ALL solvent containers closed to limit evaporation <input type="checkbox"/> Avoid use of coatings that contain toxic metals (chromium, lead, cadmium, nickel, and manganese) by asking suppliers for alternative formulations? <input type="checkbox"/> Use paintless dent repair techniques <input type="checkbox"/> Avoid use of methylene-chloride based paint strippers <input type="checkbox"/> Automatic enclosed gun washer <input type="checkbox"/> Use water-based or low-solvent coatings (primers, basecoats and painting) <input type="checkbox"/> Use low-VOC solvents or thinners <input type="checkbox"/> Two-stage solvent use (Wash first with used solvent, then wash with clean solvent. When first wash solvent no longer cleans, replace with second wash solvent, replace second wash solvent with fresh solvent, recycle first wash waste solvent.) <input type="checkbox"/> Recycle solvents with on-site (or off-site) distiller <input type="checkbox"/> Have an inventory system (first-in, first-out) in place to prevent products from going out of date? <input type="checkbox"/> Use computerized paint mixing system to minimize mistakes/over-mixing <input type="checkbox"/> Use non-solvent based putty/fillers <input type="checkbox"/> Other (specify) <p>b. Dust/Particulate matter</p> <ul style="list-style-type: none"> <input type="checkbox"/> Use a disposable paint cup system to minimize unused paint and emissions <input type="checkbox"/> Use a ventilated sander or self-contained media plaster to minimize emissions from preparing parts <input type="checkbox"/> Reusable aerosol or pump spray containers <input type="checkbox"/> Use Roll-on Primer <input type="checkbox"/> Other (specify) | |

| Energy Efficiency Practices | Instructions and Tips |
|--|--|
| <p>EE 1: Please check any of the following actions you have taken to minimize energy use in your shop:</p> <p>a. Paint booth area:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Paint booth energized only when necessary <input type="checkbox"/> Booth lights kept clean <input type="checkbox"/> Filters changed regularly to ensure good airflow (which reduces draw on HVAC motors) <input type="checkbox"/> Paint booth fan motors have variable speed drives <input type="checkbox"/> Booth uses heated air recirculation <input type="checkbox"/> Energy efficient equipment (motors, fans, lighting, spray guns) purchased new or for replacement <input type="checkbox"/> Booth lighting on timers/motion sensors to reduce energy use <input type="checkbox"/> Other (specify) <p>b. Shop areas:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Installed specialized controls (timers, motion sensors) that turn off or throttle back lights, heat, or equipment when areas are not occupied and/or in use <input type="checkbox"/> Install programmable thermostat for heating/cooling <input type="checkbox"/> Installed efficient fluorescent lights (<T-12) <input type="checkbox"/> Encouraged employees to turn off lights <input type="checkbox"/> Cleaned light fixture reflectors to increase available light <input type="checkbox"/> Reduced lighting intensity where acceptable <input type="checkbox"/> Taken advantage of day-lighting <input type="checkbox"/> Install dusk to dawn lighting fixtures/equipment <input type="checkbox"/> Completed an energy audit/aware of monthly electricity/fuel use <input type="checkbox"/> Insulated building, windows and hot/cold ducts or pipes <input type="checkbox"/> Regularly check your air compressor system for leaks and repair all leaks found. <input type="checkbox"/> Regularly check your air compressor to ensure that the pressure setting isn't higher than it needs to be. <input type="checkbox"/> Use electric tools like shop-vacs or blow dryers instead of the compressed air system? <input type="checkbox"/> Energy efficient office products/machines (computers, copiers, etc.); reduce number of machines in use <input type="checkbox"/> High efficiency furnace; In floor heating <input type="checkbox"/> Other (specify): | <p>Air compressor tips:</p> <ul style="list-style-type: none"> - Walk along compressor pipes/hoses right after turning off the compressor, and listen for hissing. Keep a record of whether the compressor cycles on and off frequently when not in use. A ¼-inch leak can cost you \$2,800 per year. - Think about whether the air compressor is properly sized for your foreseeable future needs. Every 2 PSI reduced can save you 1% in electricity usage and cost.) - Turbines for HVLP or small electric tools for specific purposes like buffing or sanding may be preferred to pneumatic |

Congratulations! You have reached the end of the self-certification checklist and have completed your review of your auto body shop operations. If you answered “Yes” to all the “Yes / No” questions in the checklist, your shop is complying with the applicable federal and state requirements. If you answered “No” to any “Yes / No” questions above, you may need to make some changes to comply with the requirements.

Submit the completed checklist to the WI SBCAAP listed on the front page of this checklist, keep a copy for your files, and take the actions needed to bring your shop into compliance. For help with questions about complying with the regulations, contact your state Small Business Environmental Assistance Program as indicated on the front page.