

COMMON MEASURES PROJECT
Final Auto Body Indicators
Revised
1-29-08

AUTO BODY DEFINITION:

The Common Measures Auto Body Sector is defined as any commercial or academic motor vehicle operation involving collision repair, vehicle painting, paint stripping or sanding, body work, antique restoration, or student training on any on these areas, where the work is performed inside a building or structure.

AIR INDICATORS:

We are asking that each state benchmark performance using the following air indicators, even if the indicator is not a requirement in your state. In such cases, please consider the indicator a Best Management Practice and evaluate whether the facility is engaged in the practice (e.g., painters properly trained in high transfer efficiency).

1. Are all spray-applied coatings applied using an HVLP spray gun or an equivalent high transfer efficiency technology?

Compliance Verification:

Visual inspection of spray gun for HVLP mark. If no HVLP mark on spray gun, inspector should ask facility for any documentation that demonstrates spray gun achieves the transfer efficiency of an HVLP spray gun. If no documentation is available, inspector should collect spray gun manufacturer's name and model number.

Note: Other equivalent high transfer efficiency technology examples: electrostatic application, airless spray gun, air assisted airless guns.

This question can be answered either yes or no.

2. Have the painters been properly trained in high transfer efficiency spraying within the last five years?

Compliance Verification

Training consists of hands-on and/or classroom training that includes initial and/or refresher training in the following (inspector will check-off):

Surface preparation;
Spray gun setup and operation for different types of coatings to improve transfer efficiency and minimize coating usage and overspray;
Routine spray booth and filter maintenance;
Safety precautions;
Environmental compliance;
Other

This question can be answered either yes or no

2a. If yes, is this training documented?

Compliance Verification

Inspector will ask to see documentation. Since many states have not implemented this as a requirement, the compliance verification will be to determine if the facility is following the practice of “documenting.” If the facility produces documentation, then the requirement is met. We will not evaluate the “quality” of documentation. In future rounds of inspections, we can be more specific on quality.

This question can be answered either yes or no

3. Does your shop use ventilated sander (dustless vacuum) equipment that captures paint dust and body filler, or an overhead capture system?

Compliance Verification

Inspector will perform visual inspection.

Note: Equipment should be easy to identify. Vacuum sanders have hose hooked up to sander head.

This question can be answered either yes or no

4. When sanding, do you keep the shop doors closed to avoid releasing dust outdoors?

Compliance Verification

Inspector will perform visual inspection of doors when shop is sanding. If no sanding activity is done during the visit, inspector should ask facility if they keep the shop doors closed when sanding.

This question can be answered either yes or no

5. Are all spray-applied coatings applied in an enclosed ventilated spray booth or preparation station?

Compliance Verification

Inspector will perform visual inspection of station to confirm a fully enclosed roof with four walls and is well ventilated.

Note: Walls can also be heavy duty curtains with velcro.

This question can be answered either yes or no

5a. If yes, is the station fitted with particle filters on the exhaust?

Compliance Verification

Inspector will perform visual inspection of pipe and filter as well as ask the facility if station is fitted with particle filters on the exhaust.

Note: May see wall fan and small box with filters

6. If the facility uses a spray booth or prep station, is it fitted with a type of filter technology or system that has been demonstrated to achieve at least 98-percent capture of paint overspray (this would include polyester fiber or fiberglass filters)?

Compliance Verification

Inspector will ask for any documentation, e.g. on filter package or from distributor, of the filter efficiency.

Note: Visual inspection may be too difficult to determine compliance.

This question can be answered yes or no.

7. Is all paint spray gun cleaning done with a fully enclosed spray gun washer or in a manner that avoids creating an atomized mist or spray of gun cleaning solvent?

Compliance Verification

Inspector will ask facility to demonstrate how guns are cleaned.

Acceptable methods of spray gun cleaning include: Hand cleaning of parts of the disassembled gun in a container of solvent; flushing solvent through the gun without atomizing the

solvent and paint residue, by using a fully enclosed spray gun washer, or by a combination of these non-atomizing methods.

This question can be answered either yes or no

THE FOLLOWING FOUR QUESTIONS ARE RELATED TO RECORD KEEPING:

Since there was so much variation on record keeping requirements across the states, we have decided to default to using the federal record keeping requirements and ask that each state be willing to benchmark performance even if it is not required in the state. In other words, if any of the records are not required, consider them a Best Management Practice and evaluate whether the facility is engaged in the practice.

States can also separately add any other record keeping requirements that they want to evaluate independently.

8. Does the facility have documentation of the amount of coatings used that contain chromium, lead, cadmium, nickel, and manganese (especially hexavalent chromium, most common in corrosion control undercoats and red, orange, and yellow paint colors) and the metals content of these coatings?

Compliance Verification

Inspector will ask to see documentation

This question can be answered either yes, no or NA (**NA for facilities that do not use coatings that contain chromium, lead, cadmium, nickel, and manganese**).

9. Does the facility keep records on-site of paint strippers containing methylene chloride (MeCl), including the MeCl content of the paint stripper used, in sufficient detail to determine the annual usage of paint strippers using MeCl?

Compliance Verification

Inspector will ask to see documentation

This question can be answered either yes, no or NA (**NA for facilities that do not use paint strippers containing methylene choride**).

10. If the facility uses MeCL for paint stripping, is there a written MeCl minimization plan?

Compliance Verification

Inspector will ask to see minimization plan.

This question can be answered either yes, no or NA

11. Does the facility have MSDS or formulation data supplied by manufacturer for all the solvents and coatings that they use?

Compliance Verification

Inspector will ask to see documentation. If no physical documentation is available, inspector will confirm if facility uses a color matching computer technology on-site that has formulation data in it, and if so, ask to see data.

This question can be answered yes or no.

HAZARDOUS WASTE INDICATORS:

We are asking that each state benchmark performance using the following indicators, even if the indicator is not required for this facility's classification. In such cases, please consider the indicator a Best Management Practice (BMP) and evaluate whether the facility is engaged in the practice. The exception to this is when an indicator is not a practice the facility would ever engage in, e.g., some states have no accumulation limits for hazardous waste and therefore this indicator could not be a BMP for that state.

12. What is the maximum amount of RCRA hazardous waste the facility generates in a month _____ (includes satellite accumulation)

13. What is the facility's hazardous waste generator status under state's classification system, e.g., CESQG, SQG, LQG

14. Are all hazardous waste containers properly labeled with the words "hazardous waste" and clearly marked with the date on which accumulation began?

Compliance Verification

Inspector will determine:

- If all containers have labels
- If labels are marked with both items
- If labels are clear and legible

Applies to central accumulation areas only, not laboratories or satellite areas

Note: inspector will use best professional judgment to determine what is "clear" and "legible" and whether the facility made a "genuine and complete effort" to meet this requirement

This question can be answered either yes or no

15. Are all hazardous waste containers closed unless waste is being added or removed?

Compliance Verification

Inspector will confirm that all containers are closed at the time of inspection unless waste was being added or removed.

Applies to central accumulation areas only, not laboratories or satellite areas

Note: "closed" means if the containers were tipped, nothing would spill "Funnels" are acceptable if they are closed.

This question can be answered either yes or no

16. Are all hazardous waste containers in good condition, (i.e., free of severe rusting or apparent structural defects, and not leaking)?

Compliance Verification

Inspector will perform visual inspection of conditions of all containers looking for leaks and/or severe corrosion, bulging, rusting or dents

Applies to central accumulation areas only, not laboratories or satellite areas

Note: inspector will use best professional judgment to determine what is "severe." There should be no imminent threat.

This question can be answered either yes or no

17. At the time of inspection, has the facility exceeded the state's time limits for the amount of RCRA hazardous waste that can be stored on-site by this category generator (excludes satellite accumulation)?

Compliance Verification

As applicable, inspector will verify conformance based on dates on containers which detail when accumulation begins (if no containers are labeled, then inspector should answer **“no labels.”**)

This question can be answered yes, no or NA since some states have no time limits for CESQGs.

18. At the time of the inspection, has the facility exceeded the state's accumulation limits for hazardous waste for this category of generator (excludes satellite accumulation)?

Compliance Verification

As applicable, inspector will inventory all hazardous waste accumulated on-site in containers and tanks to determine total weight of waste being accumulated at one time.

This can be answered yes, no or NA since some states have no accumulations limits.

19. Is a manifest required for this type of facility to ship hazardous waste?

This question can be answered either yes or no

19a. If yes, does the facility use a hazardous waste manifest to ship its hazardous waste when a manifest is required?

Compliance Verification

Inspector will look at one (1) year of manifest records as well as ask the facility if they have kept three (3) years of records.

Note: the word “look” in this case means that the inspector will confirm that all shipments have been manifested and not that each and every manifest was filled out correctly. The inspector will look for any significant gaps in the pattern of shipments

This question can be answered either yes or no

19b. If a manifest is not required, does the facility document its hazardous waste shipments, e.g. Manifest, Bill of Lading, other documentation?

Compliance Verification

Inspector will ask to see documentation

This question can be answered either yes or no

20. Has the facility identified all of its hazardous waste streams?

Compliance Verification

Conformance will be determined based on

- Review of production processes,
- Type of wastes generated at these processes and

- Whether or not the facility has made hazardous waste determinations on all waste streams.

Note: this is something inspectors do routinely. Interns may need to bring this information back to state project lead.

This question can be answered either yes or no

21. Is the facility required to have emergency procedures?

This question can be answered either yes or no

21a. If yes, is the facility in compliance with the applicable requirements for emergency procedures for this category of generator?

Compliance Verification

Based on individual state requirements.

This question can be answered either yes or no

21b. If emergencies procedures are not required, does the facility have emergency procedures in place?

Compliance Verification

Emergency procedures can include:

The facility has posted the current name and telephone number of the emergency coordinator;

Posted the location of fire extinguishers and spill control material, and if present, fire alarm

Posted the telephone number of the fire department, unless the facility has a direct alarm
Other? (inspector should describe)

Visual inspection and inquiry into whether the information is up to date

This question can be answered either yes or no

22. Does the facility have an employee training program that teaches employees proper hazardous waste management procedures?

Compliance Verification

Inspector will ask facility to describe program as well as ask to see any documentation. The compliance verification will be to determine if the facility is following the practice of having an employee training program. If the facility demonstrates its existence, then the requirement is met. We will not evaluate the “quality” of the training program. In future rounds of inspections, we can be more specific on quality.

This question can be answered either yes or no

23. Is there any indication of spills in or near the shop?

Compliance Verification

Inspector will check for stains on the ground and in and around manholes, leaking tanks and containers and pooled liquids.

This question can be answered either yes or no

INDUSTRIAL WASTEWATER INDICATORS

24. Does the facility discharge IWW to surface water?

This question can be answered either yes or no

24a. If yes, is facility in compliance with the applicable requirements for these discharges?

Compliance Verification

Based on individual state requirements for these discharges.

This question can be answered either yes or no

25. Does the facility discharge IWW to a sewer system?

This question can be answered either yes, no or NA

25a. If yes, is facility in compliance with the applicable requirements for these discharges?

Compliance Verification

Based on individual state requirements for these discharges.

This question can be answered either yes or no

26. Does the facility discharge IWW to groundwater (e.g., discharge to an on-site septic system, drywell, etc.)?

This question can be answered either yes, no or NA

26a. If yes, is facility in compliance with the applicable requirements for these discharges

Compliance Verification

Based on individual state requirements for these discharges.

This question can be answered either yes or no

27. Does the facility have any unsealed floor drains?

Compliance Verification

Inspector will perform visual inspection of floor drains

This question can be answered either yes or no

27a. If yes, is the facility in compliance with the state standard for discharges to unsealed floor drains?

Based on individual state requirements for these discharges.

This question can be answered either yes or no

POLLUTION PREVENTION INDICATORS

28. Has the facility taken one or more actions to conserve water the past three years?

Compliance Verification

The inspector will ask the facility to describe any initiatives in the past three years.

This question can be answered either yes or no

29. Has facility taken one or more actions to conserve energy over the past three years?

Compliance Verification

The inspector will ask the facility to describe any initiatives in the past three years.

This question can be answered either yes or no

30. Has the facility taken one or more actions to reduce toxics the past three years? Check all that apply:

___ Use water-based or low-solvent coatings (primers, basecoats and painting)?

___ Attempt to avoid use of coatings that contain toxic metals (chromium, lead, cadmium, nickel, and managanese) by asking suppliers for alternative formulations?

___ Avoid use of methylene-chloride based paint strippers?

___ Recycle any solvents?

___ Use recycled solvent for gun cleaning?

___ Have an inventory system in place to prevent products from going out of date?

___ non-solvent based putty/fillers

___ Other (inspector should describe)

Compliance Verification

The inspector will ask the facility if they have undertaken any of these initiatives in the past three years.

If yes to indicator, inspector will ask for a brief description of the actions the facility undertook.