

# The Small Business Resource

Vol. 4 No.4

A Publication of Ohio EPA, Small Business Assistance Office

Jan. 2001

## Spotlight on Auto Service Shops

### *In this issue*

**Water Issues** 2  
Floor Drains

Ohio EPA's Pretreatment  
Program

**New Resources** 2  
Auto Service Manual

**Air Issues** 3  
Used Oil Space Heaters

Air Standards for  
Solvents

**Waste Issues** 4  
Used Oil Regulations  
Used Antifreeze

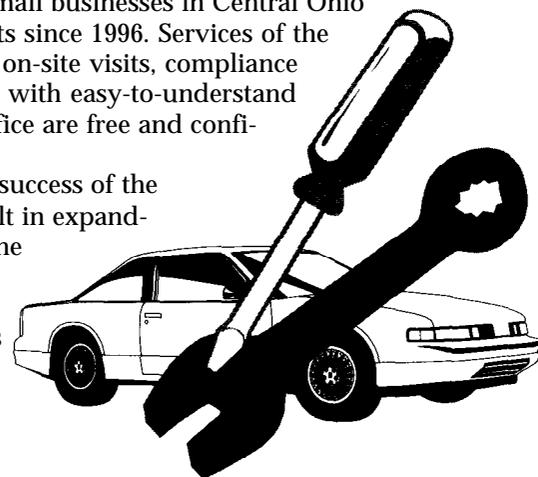
**Pollution Prevention** 7  
Reducing Your Solvent  
Waste

This issue of the Small Business Assistance Office's (SBAO) newsletter focuses on auto service shops. It includes articles which relate to common compliance issues for service shops. In addition, we've highlighted some of the resources that might be helpful to you in understanding and complying with the regulations.

The SBAO has been helping small businesses in Central Ohio with their compliance requirements since 1996. Services of the office include a telephone hotline, on-site visits, compliance workshops and a technical library with easy-to-understand publications. All services of the office are free and confidential.

It is hoped that the continued success of the program in Central Ohio will result in expanding our services to other areas of the state. If you haven't taken advantage of the SBAO, you should. By working with the office to address environmental compliance issues, small businesses benefit by:

- protecting workers' health and safety;
- reducing environmental liability and the potential for noncompliance penalties;
- preserving environmental resources; and
- identifying ways to save money through pollution prevention.



For more information, contact the Small Business Assistance Office at (800) 329-7518.

Or, visit our Web site at [www.epa.state.oh.us/other/sbao](http://www.epa.state.oh.us/other/sbao).

## Water Issues

### Floor Drains: Help or Harm?

Floor drains are found at many small businesses. Some floor drains are necessary for day-to-day operations. Others are used for emergency purposes. Some floor drains don't seem to have any apparent use. Do you know where the floor drains in your business go? Are you discharging wastewater or other fluids into your floor drains?

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

Some floor drains lead into a sanitary sewer, where wastewater goes directly to a public wastewater treatment plant (called a POTW). Other floor drains lead to an on-site sewage treatment system like a septic tank. Sometimes floor drains lead directly to an underground holding tank or discharge to a waterway or to the ground outside.

Under Ohio EPA's water pollution control regulations, a company CANNOT discharge industrial wastewater into an on-site sewage treatment system (e.g., septic tank, leach field). This activity is prohibited unless a company has obtained a permit (called a UIC permit) from Ohio EPA. Directly discharging industrial wastewater onto the ground is also NOT allowed under the regulations.

Any company that wants to discharge an industrial wastewater to waters of the state needs to get a permit (called an NPDES permit) from Ohio EPA. Examples of waters of the state include streams, rivers, lakes, ponds, marshes, waterways, wells and springs.

If your floor drains lead to any water of the state, you must have a discharge permit for this activity.

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

### Important Points to Remember

- Check all your floor drains and make sure you know where they drain to.
- If you are using floor drains to discharge industrial wastewater into a septic system or onto the ground, you need to stop these discharge activities immediately. You must find another way to manage your wastewater.
- If you are using floor drains to discharge industrial wastewater to a water of the state, contact Ohio EPA's Division of Surface Water for information on obtaining an NPDES permit. If you do not have a discharge permit for this activity you must find another way to manage wastewater.
- If you are using floor drains to discharge wastewater to a local wastewater treatment plant, make sure the treatment plant knows about this activity. You may be required to conduct treatment on the wastewater before discharging it. You may also need to get a permit for the discharge.
- DO NOT put other fluids like oil, solvents, paints or chemicals into a floor drain. This could contaminate

your property and expose you to large fines and clean up costs.

- Think about installing an emergency shut-off on the drain pipes to prevent accidental spills from entering the sewer.
- If you have floor drains at your company that you are not using, think about having them capped or plugged. Good housekeeping and a little planning can help avoid costly problems later.

If you have any questions about floor drains and Ohio's water pollution control requirements, contact the Small Business Assistance Office for help at (800) 329-7518. You can also contact your local Ohio EPA district office, Division of Surface Water (DSW) for assistance.

### Ohio EPA's Wastewater Pretreatment Program

Ohio's wastewater pretreatment program helps to ensure that wastewater discharges to local wastewater treatment plants (also called POTWs) are properly controlled. In general, POTWs are specifically designed to treat sanitary wastes from rest rooms, sinks, etc., – NOT industrial wastewaters that can carry pollutants such as chemicals or heavy metals.

If industrial wastewater discharges to the POTW are not properly controlled, they could seriously disrupt public sewer system operations.

Pretreatment is defined as eliminating or reducing the amount of pollutants in wastewater before discharging to a POTW. Businesses are commonly required to perform pretreatment activities such as: flow reduction, oil/grease removal, neutralizing pH, chemical precipitation or other forms of chemical, biological and physical treatment.

continued on page 7

## *Air Issues*

### **Burning Used Oil in Space Heaters**

During colder months, service centers, car dealerships and other small businesses help heat their shops by burning used oil in space heaters. It's important that businesses burning used oil in their space heaters are aware of Ohio EPA's used oil and air pollution requirements.

The used oil regulations are found in Chapter 3745-279 of the Ohio Administrative Code (OAC). Rule 3745-279-33 states that used oil may be burned in space heaters if the following conditions are met:

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

The used oil cannot be mixed with any hazardous waste. It's also important to know that burning used oil in space heaters causes air pollution. The level of air pollution (or emissions) depends on the amount of oil burned. Space heaters having a burner rating of less than 500,000 BTUs per hour cause little air pollution and can qualify for the "de minimis exemption" under OAC Rule 3745-15-05.

Qualifying for the de minimis exemption means that the business does not have to get an air permit from Ohio EPA to operate the space heater. If the space heater qualifies for this exemption, the business does not need to provide EPA's Division of Air Pollution Control with this information. However, any business burning waste oil should keep a monthly record of the amount burned (in

gallons) and the origin of the waste oil (either generated on-site or received from a do-it-yourselfer). Records of any lab testing that has been done on the oil or information from the supplier should also be kept in file.

The burner rating (BTU capacity) is usually found on the space heater itself or in the manufacturer's literature. Most space heaters on the market are rated less than 500,000 BTU / hr. If the heater's rating is unknown, the manufacturer can be contacted for this information. Heaters that cannot burn more than five gallons of oil per hour are also likely to qualify for the de minimis exemption.

Acceptable oils for burning include: used crankcase oils from automobiles

and trucks, used metal working and lubricating oils, 90 W. gear oil, automatic transmission fluid, hydraulic oil, and heat transfer fluids. Burning other types of waste oils may require approval from the EPA's Division of Air Pollution Control (DAK).

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

### **Do You Clean Metal Parts?**

#### **Complying with EPA's air standards for halogenated solvents**

If your company cleans metal parts with any of the following six halogenated solvents then you should be in compliance with the National Emission Standards for Hazardous Air Pollutants (NESHAPs) regarding halogenated solvent cleaning:

- methylene chloride (MC)
- perchloroethylene (PCE)
- trichloroethylene (TCE)
- 1,1,1-trichloroethane (TCA)
- carbon tetrachloride (CT)
- chloroform (C)

This regulation was issued by the U.S. EPA in December 1994 to help control toxic air emissions from solvent cleaning machines. The deadline for compliance with this standard was December 2, 1997.

#### **How do I know if I use one of these solvents?**

To find out if you use one of these solvents, consult the Material Safety Data Sheets (MSDS) from your solvent supplier.

#### **What should I do if I'm not sure my company is in compliance?**

If you use any of the six regulated solvents and have not addressed compliance with this standard you must do so promptly. Do not ignore the issue!

#### **What will I have to do to reach compliance?**

The compliance requirements vary depending on factors such as type of cleaning unit (i.e., batch-vapor, cold batch, etc.), size of unit and amount of solvent used. Compli-

continued on page 4

## Waste Issues

### Ohio EPA's Used Oil Regulations

In 1998, Ohio EPA adopted revised used oil regulations, found in Ohio Administrative Code (OAC) Chapter 3745-279. Unlike the old used oil rules that applied primarily to used oil burning, the revised regulations apply to many different used oil activities. Businesses subject to the used oil regulations include those that *generate, market, rerefine/process, transport or burn* used oil.

Small businesses subject to the used oil rules include "generators" such as service stations, auto repair shops, car dealers, quick lubes and fleet operations. In addition, transporters delivering or consolidating shipments of used oil are regulated. Also regulated are used oil processors and rerefiners that blend/mix used oil to produce fuel or process used oil to produce "new oil." Used oil burners include facilities that burn used oil for energy recovery, primarily in an industrial furnace or boiler, cement kiln or asphalt kiln.

Transporters, rerefiners, processors, and burners must have an identification number from Ohio EPA's Division of Hazardous Waste Management (DHWM) for used oil activities. To obtain an identification number, a company must complete a notification form (form 8700-12) and return it to DHWM.

The used oil standards also include "good housekeeping" practices that must be followed. For example, containers and tanks holding used oil must be in good condition and labeled. The regulations include spill prevention measures and outline procedures that must be followed in the event of a spill. In addition, some used oil facilities such as transfer operations, processors / rerefiners and burners are required to have secondary containment for their aboveground used oil tanks or containers.

If you are managing used oil, it is important that you understand how these regulations affect your business. If you have questions about how these regulations apply to you, contact Ohio EPA, Division of Hazardous Waste Management, Technical Support Unit, at (614) 644-2917 or your local district office.

### What Can I Do With Used Antifreeze?

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

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

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

also evaluated to see if they are hazardous wastes.

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

If you would like more information about determining if used antifreeze is a hazardous waste or about used antifreeze recycling equipment or services, please call the SBAO at (800) 329-7518. You can also contact your local Ohio EPA district office, Division of Hazardous Waste Management.

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### Metal Parts continued from page 3

ance may be as simple as keeping usage records or as involved as equipment additions and changing work practices.

### Where can I get help?

Small businesses can receive free and *confidential* assistance from the Ohio Small Business Assistance Program (SBAP). The SBAP provides on-site visits to help you comply with the air pollution requirements. This can include explaining the halogenated solvent standard or even helping you complete an air permit application.

If you do not use any of the six solvents listed above then you are exempt from this air standard. However, you still may be subject to air permit requirements for other activities at your company. For any other questions you have on air permits, contact the SBAP at (614) 644-4830.

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## Environmental Compliance Resources for Auto Maintenance Shops

The following resources may be helpful to you in understanding the environmental regulations that apply to your auto maintenance shop. To get your FREE copies, complete this form and return it to the Small Business Assistance Office.

### Publications

#### Ohio EPA Resource Guide

Learn more about the Ohio EPA and resources available to you.  
April 1999.

#### Small Business Environmental Compliance Self-Assessment Guide (booklet)

Do a self-check of your compliance with Ohio EPA's regulations.  
June 2000.

#### Getting Copies of Ohio EPA's Regulations (fact sheet)

Need to get Ohio EPA's regulations? This fact sheet explains how.  
September 1998.

#### Pollution Prevention and Automotive Repair Facilities (fact sheet)

Ohio EPA, Office of Pollution Prevention. February 1999.

#### Environmental Laws (fact sheet)

An overview of environmental regulations. September 1998

#### Running an Auto Maintenance Shop? Know Your Ohio EPA Regulations (fact sheet)

Small Business Assistance Office.  
August 1999.

#### How Your Small Business Can Get in Touch With EPA Air Requirements (brochure)

Ohio EPA, Small Business Assistance Program, Division of Air Pollution Control.

#### Air Pollution Requirements: New Halogenated Solvent Cleaning Standards

Ohio EPA, Small Business Assistance Program. January 1997.

#### Does Your Facility Generate Automotive Service Wastes? (brochure)

U.S. EPA, Underground Injection Control Program (UIC).

#### Selecting a TSD Facility to Handle Your Hazardous Wastes (fact sheet)

Ohio Small Business Assistance Office. March 1997.

#### Guidance on the Management of Solvent-Contaminated Rags and Wipers

Ohio EPA, Division of Hazardous Waste Management, March 1994.

#### Identifying Your Hazardous Waste (fact sheet),

Ohio EPA, SBAO, February 2000.

#### Handling Paint Waste from Your Business (fact sheet),

Ohio EPA, SBAO, August 2000.

#### Understanding the Hazardous Waste Rules - A Handbook for Small Business

U.S. EPA Solid Waste & Emergency Response, EPA 530-K-95-001  
June 1996.

### Videos

#### Profit From Waste: New Strategies for the Vehicle Servicing Industry

This 14-minute video profiles several Ohio companies and how they have saved money and improved shop productivity by changing the ways in which they manage waste, or by eliminating waste.

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**Please send me the resource(s) circled above...**

Name \_\_\_\_\_

Company \_\_\_\_\_

Address \_\_\_\_\_

City State, Zip \_\_\_\_\_

To Order Call: 800-329-7518

Fax: 614-728-8579

OR Fold and Mail to: Ohio EPA, SBAO  
3232 Alum Creek Drive  
Columbus, Ohio 43207

Ohio EPA  
Small Business Assistance Office  
3232 Alum Creek Drive  
Columbus, Ohio 43207-3417

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# Pollution Prevention

## Reducing Cleaning Solvent Waste

Parts-washing units are used by many small businesses for cleaning equipment. Like other tasks, your cleaning procedures should be reviewed occasionally to ensure that best work practices are followed. By having efficient cleaning procedures, you can reduce waste, free up labor and save money.

### Equipment Management

- **Service Contracts:** Negotiate your service contract so solvent change outs fit your use schedule, especially if you have seasonal fluctuations in your shop's solvent needs. Remember, you incur costs and liability with each shipment of waste.

- **Cleaning demands:** Segregate cleaning into two stages, each having a dedicated washing unit. Using two units extends the usefulness of the solvent.

- **Equipment Options:** Use parts-washing units equipped with filters or other separation options that will keep the solvent cleaner longer. Add-on accessories are available from your equipment vendor.

### Equipment Operation

- **Need:** Think about when parts need cleaning. If only interior surfaces need to be cleaned, avoid cleaning exterior surfaces that add dirt, grease, or paint and overburden your solvent. If extra surface cleaning is unavoidable, scrape or wipe off dirt before putting the part into the solvent.

**Techniques:** Splashing solvent and dragging out dripping parts depletes your solvent reservoir and makes a mess. Clean each part carefully and use drain racks to save solvent and avoid unnecessary cleanup.

- **Evaporation:** Cover and turn off circulating sinks to conserve energy and to keep solvents from evaporating.

- **Evaluation:** The appearance of used solvent may not be a good indicator of the solvent's ability to clean. Monitor the solvent to determine its maximum useful life and then modify your change out schedule to get the most out of your solvent.

## Inventory Management

- **Supply:** Limit access to solvent supplies. Keeping and displaying records on solvent use may be helpful for controlling waste, especially in an operation with a large workforce.

- **Convenience:** Consider using a central cleaning station. When using individual workstations, weigh their potential for accidents, exposure and waste generation against their convenience and efficiency.

Original article written by Mick Jost, 1997. Minnesota Technical Assistance Program (reprinted with permission).

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## Wastewater Treatment Program

*continued from page 2*

Ohio EPA has delegated the management of pretreatment programs to many POTWs. These approved POTWs run their pretreatment programs under Ohio EPA's oversight. Where Ohio EPA has not approved a local POTW's pretreatment program, Ohio EPA directly regulates industries that discharge to the POTW. You can contact Ohio EPA's Division of Surface Water to find out if your local POTW has an approved pretreatment program.

A business discharging industrial wastewater to an approved POTW needs to contact the POTW directly to discuss pretreatment requirements. If the POTW does not have an approved pretreatment program, the business may be required to get a discharge permit directly from Ohio EPA. Permission from the POTW for

the discharge will also be required before Ohio EPA will issue a permit. If a business needs to construct wastewater treatment or storage units, this activity requires a permit-to-install (or PTI) from Ohio EPA. These PTI requirements may also apply if the company modifies its wastewater units.

Even small businesses can be subject to the pretreatment requirements for industrial wastewater discharges. If you need more information on complying with the pretreatment requirements, contact your local POTW or Ohio EPA district office, Division of Surface Water.

## New Resources

In late 2000, the Auto Service Association of Ohio, Inc. (ASA) finished its *Environmental Self-Help Guide for Automotive Repair Operations*. This guide helps explain the environmental regulations in easy-to-understand language for auto repair shops. It also covers a number of topics such as air, waste, wastewater and other requirements. For more information, contact ASA at (740) 548-4889.

### Ohio EPA District Offices

- Central District Office  
(614) 728-3778
- Northeast District Office  
(330) 963-1200
- Northwest District Office  
(419) 352-8461
- Southeast District Office  
(740) 385-8501
- Southwest District Office  
(937) 285-6357

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### SBAO Small Business Assistance Office Ohio EPA

Are you a small business owner? Do you have questions about environmental regulations?

If you need help understanding the regulations and how to comply with them, give us a call at 1-800-329-7518 or 614-728-8573.

*Our services are* **FREE** *and* **CONFIDENTIAL**



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