

Environmental Compliance Certification Program

Self-Certification Checklist Package

For

Auto Salvage Yard Facilities



August 2019



Rhode Island Department of Environmental Management
Office of Customer and Technical Assistance
235 Promenade Street
Providence, RI 02908
(401) 222-4700

<http://www.dem.ri.gov/>

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2019 Compliance Certification Instructions

1.0 What is Compliance Certification?

In order to improve environmental protection at less cost to both the government and businesses, auto salvage yard facilities can self-certify to the Rhode Island Department of Environmental Management Office of Customer & Technical Assistance (RIDEM OCTA) that they are complying with the environmental regulatory requirements that apply to their business. This common sense approach to regulation holds great promise for making it easier for the auto salvage yard industry to meet - and surpass - Rhode Island's environmental regulations. This package contains the materials needed to complete and submit the self-certification checklist. The accompanying workbook provides the information needed to help you understand and comply with state and federal regulations. The entire program package has two parts:

1. **Environmental Compliance Certification Workbook for Auto Salvage Yard Facilities:** The workbook explains the environmental protection standards and regulatory requirements that apply to your facility, and how to make sure you are complying with them. The workbook is designed to be used in conjunction with the accompanying self-certification checklist and can also be used as a reference for your facility. The workbook also provides information regarding best management practices and pollution prevention techniques that can help your facility minimize human health risks and environmental impacts while saving money.
2. **Self-Certification Checklist and Accompanying Forms Booklet:** The checklist requires facility information (facility name, address, owner, etc.), and contains a series of compliance questions, which generally require "Yes" or "No" answers about whether or not your facility is following the applicable environmental regulatory requirements. The checklist ends with a certification statement which must be signed by the facility owner. The checklist begins on Page 11 of this booklet. Also, three additional forms are provided as follows:
 - **2019 Non-Applicability Statement:** This statement is to be submitted only if you are not required to self-certify. See Section 1.1 of the **Certification Workbook** to determine if you are eligible to file a **Non-Applicability Statement** (You may file this statement only if there is no active auto salvage yard operations at your facility address, or if the facility property

has been sold.) If either of these situations are true, then complete this form and submit it to RIDEM. It can be found on Page 9 of this booklet.

- **Return-to-Compliance Plan:** Complete the **Return-to-Compliance (RTC) Plan** if your facility is not in compliance with a particular checklist item at the time of certification. The facility must detail its plans to address the particular items to bring them back into conformance with environmental regulations within a specified period of time. This form can be found on Page 37 of this booklet.
- **Return-to-Compliance Final Report:** Complete the **Return-to-Compliance Final Report** for each item listed in the Return-to-Compliance form. The Return to Compliance Final Report must list the corrective action taken and the date that your facility returned to compliance. A copy of this form can be found on Page 39 of this booklet.

1.1 Submission Timeline

Compliance Certification Checklists must be returned and postmarked by November 15, 2019. **Return-to- Compliance Forms** must also be submitted with the compliance certification checklist on or before November 15, 2019. Facilities that submit **Return-to-Compliance Forms** will receive an additional 60-day grace period in which to bring their operations into compliance. Certification will take place every three years.

Questions and/or Comments can be directed to:

Michele McCaughey, Program Coordinator
RI DEM - Office of Customer and Technical Assistance
Auto Salvage Yard Facilities Certification Program
235 Promenade Street
Providence, RI 02908-5767
(401) 222-4700, x7269

1.2 Do I have to certify?

Participation in the program is voluntary. However, any auto salvage yard licensed and operating in the State of Rhode Island should strongly consider participating in this Self-Certification Program to take advantage of the benefits detailed in Section 1.2 of the workbook. All facilities that are licensed by the Rhode Island Department of Business Regulation (RIDBR) as an auto salvage yard, or Auto

Wrecking and Salvage Yard as defined by RIDBR, are eligible to participate in the Self-Certification Program. [Note: facilities engaged in the business of operating an auto wrecking and salvage yard must be licensed by RIDBR]

All auto salvage yard facilities operating in the State of Rhode Island must comply with the standards outlined in the "Certification Workbook", whether or not they self-certify. To participate in the program, please complete and return the certification checklist as instructed.

If your facility does not meet the description of an actively operating auto salvage yard, or if this package has been sent to you in error, please complete and sign the **2019 Non-Applicability Statement** found on Page 9 of this booklet, and return to RIDEM. If you have any questions regarding the status of your facility, please call us at (401) 222-4700.

2.0 How Do I Fill Out the Compliance Certification Forms?

1. Read the accompanying **Certification Workbook** to understand your environmental regulatory responsibilities.
2. Read the checklist and identify all the questions that apply to your facility. You may not have to answer all of the questions on the form. The form itself will direct you to skip certain questions. Do not answer questions that you are directed to skip. Additional step-by-step instructions for the **Compliance Certification Checklist** are included in Section 3.0 of this package.
3. Walk through your facility with the checklist copy and identify all the questions where you are already in compliance, and those where you will need to make changes to come into compliance. This step should be done *well* in advance of November 15, 2019.
4. If your facility will be out of compliance after November 15, 2019, be sure to submit a **Return-to-Compliance Plan** for each checklist item that you are not in compliance with.
5. Review your **Compliance Certification Checklist** for completeness. Once complete, copy your answers from the draft, make a copy of the completed

certification checklist for your files, and mail the original signed copy to RIDEM.

6. A **Return-to-Compliance Final Report**, which contains documentation of all actions taken to return to compliance, must be submitted within 60 days of submittal of the **Return-to-Compliance Plan** form.

2.1 How do I submit a Compliance Certification?

If you intend to participate in the program, you are required to complete the **Compliance Certification Checklist with any applicable Return-to-Compliance Plans**, and mail to RIDEM or email to michele.mccaughey@dem.ri.gov on or before November 15, 2019. Mail the completed certification checklist forms to:

RI Department of Environmental Management
Office of Customer and Technical Assistance
Auto Salvage Yard Facilities Certification Program
235 Promenade Street
Providence, RI 02908-5767

2.2 What is not covered by the Compliance Certification?

This Environmental Compliance Certification is intended to review many environmental regulatory requirements. There may be other Federal or Local requirements that apply to your facility, such as permits, building codes, fire codes, etc. that are not covered in this program. You must still comply with these requirements.

2.3 What Does Participation in the Self-Certification Program Entitle Your Facility To?

Compliance with environmental regulations is a requirement for all auto salvage yard facilities. Participation in the Self-Certification Program is voluntary, but entitles your facility to the following incentives:

- Reduced inspection priority by RIDEM
- Being placed on a public list of certified auto salvage yard facilities on RIDEM's website
- The ability to correct environmental violations without gravity-based penalties, provided that you comply with the RI Compliance Incentive Act

- Provides a comprehensive evaluation of your facility's compliance status, making you better prepared for a random inspection
- Free technical assistance from RIDEM's Office of Customer and Technical Assistance

Note: Participation in the Self-Certification Program does not guarantee that your shop will not be subject to a random inspection, or an inspection prompted by an employee or a complaint. Both state and federal environmental agencies have the authority to perform such inspections. These inspections can result in enforcement actions against your facility. Participation in this program will identify deficiencies and prepare your facility in the event of an inspection. However, keep copies of your checklists to assist you in demonstrating compliance with applicable state and federal regulations.

3.0 Step-by-step instructions for filling out the Compliance Certification Checklist & Associated Forms (Pages 11 through 39)

3.1 Facility Information

In this section, list the name and address of your business, the RI Department of Business Regulation (RIDBR) License Number, the individual that RIDEM should contact if there are questions about your *Certification*, your Federal Employer Identification number (FEIN) from your state and federal income tax forms, and other facility information as requested.

3.2 Non-Applicability Statement

If your facility does not meet the description of an auto salvage yard actively operated by you, or if this package has been sent to you in error, please complete, sign and return to RIDEM the **2019 Non-Applicability Statement** found on Page 9 of this booklet. If you have any questions regarding the status of your facility, please call us at (401) 222-4700.

3.3 Compliance Certification Checklist

These questions provide RIDEM with some background information about your facility and information about whether or not your facility is following the

environmental protection standards and requirements that apply to it. The workbook contains the information you will need to determine how to answer the questions. The checklist tells you where in the workbook you can find information about the environmental requirements referred to in each question.

RIDEM strongly advises you to consult the **Certification Workbook** before answering any questions. Most of the questions are "Yes" or "No" questions about compliance with particular standards or management practices. If you are not in compliance with the regulatory requirements (identified with "Submit RTC" on the "No" box checklist) on the date you certify, you must complete a *Return-to-Compliance Plan (RTC)* described below, and submit it with the *Compliance Certification Checklist*.

Please note that it is your responsibility to keep your facility in compliance with environmental protection requirements at all times. You may be subject to enforcement action if you do not comply with the standards. There are some questions that ask whether you have been doing a routine activity for the past year, such as properly maintaining your equipment. Be sure to comply with the requirements throughout the year. The *Certification Statement* includes a pledge that you have systems in place to keep your business in compliance with environmental protection standards over the next three years.

3.4 Certification Statement

The *Certification Statement* is a preprinted statement which says that the person signing the form:

- has reviewed it,
- believes the information being submitted is true,
- will make sure that management systems are in place that will keep the facility in compliance with environmental protection requirements throughout the next three years, and
- understands that information provided to RIDEM is true, accurate, and complete, to the best of that person's knowledge.

The statement may only be signed by the facility owner or certain other types of senior managers. The types of managers that are allowed to sign the statement

are listed below the space for the signature. The person who signs the form must also print or type his or her name and title on the appropriate lines, date the form, and check the space next to the type of manager he or she is. Note that you must hold one of the titles listed on the form to sign it.

3.5 Return-to-Compliance Plan (RTC)

If your facility is unable to comply with a standard at the time you certify, fill out this form. The form asks for the standard you are violating, what you plan on doing to comply, and when you will be in compliance with the requirement. Note that submittal of a "RTC" gives only an additional sixty (60) days to come into compliance. A copy of a **RTC** form can be found on Page 37 of this booklet. If you need more forms, make the necessary number of copies, or call RIDEM at (401) 222-4700 for additional copies. Attach all **RTC** forms to your completed **Compliance Certification Checklist**, and mail to RIDEM by November 15, 2019.

3.6 Return-to-Compliance Final Report

If your facility submits **RTC** forms with your completed **Compliance Certification Checklist**, you must submit a **Return-to-Compliance Final Report** for each **RTC** that is submitted. This form is not submitted with your **Compliance Certification Checklist**, but is completed and submitted to RIDEM, for each **RTC**, when the compliance issue has been corrected, and it states what corrective action that you have taken.

A copy of the **Return-to-Compliance Final Report** can be found on Page 39 of this booklet. If you need more forms, make the necessary number of copies, or call RIDEM at (401) 222-4700 for additional copies.

Program documents are also found on the Auto Salvage Yard Facilities Certification Program webpage at <http://www.dem.ri.gov/programs/customertech/auto-salvage-yard-certification.php>

Rhode Island Department of Environmental Management
Auto Salvage Yard Facilities Certification Program
2019 Facility Non-Applicability Statement



Note: Participation in the program is voluntary. However, any actively operated auto salvage yard facility should consider participating in the Self-Certification Program to take advantage of the incentives detailed in Section 2.3. All facilities that are licensed by the RI Department of Business Regulation as an "Auto Salvage Yard" or "Auto Wrecking and Salvage Yard" are eligible to participate in the Self-Certification Program. [Note: facilities engaged in the business of operating an auto wrecking and salvage yard **must** be licensed by the RI Department of Business Regulation.] If your facility does not meet the description of an auto salvage facility actively operated by you, or if this package has been sent to you in error, please complete, sign and return the **2019 Non-Applicability Statement** to RIDEM. If you have any questions regarding the status of your facility, please call us at (401) 222-4700.

Facility Information:

Facility Name: _____

Facility Street Address: _____ Phone #: _____

_____ Fax #: _____

City/Town: _____

Zip Code: _____

Contact Person: _____ Owner/Corporation: _____

This facility is not participating in the Auto Salvage Yard Facilities Certification Program for the following reason(s):

- ☐ No actively operated auto salvage yard operations occur at this address.
- ☐ The facility/property has been sold.

Please submit this form by November 15, 2019

Returning this statement does not relieve you of your responsibility to comply with environmental requirements.

Signature: _____ Date: _____

Return this form to: RI DEM/Office of Customer & Technical Assistance
Auto Salvage Yard Facilities Certification Program
235 Promenade Street
Providence, RI 02908-5767

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Rhode Island Department of Environmental Management Auto
Salvage Yard Facilities Certification Program 2019
Compliance Certification Checklist



Facility Name: _____

Address: Street _____
City/Town _____
County _____
State _____ Zip Code _____

Mailing Address (if different) _____

RI Department of Business Regulation License #: _____

Contact Person: _____

Owner Name: _____

Phone #: _____ E-mail: _____

Total Site Acreage: _____ Acres

Total Size of Vehicle Storage Area: _____ acres

Approximate Total # Vehicles Currently Stored On-Site: _____

Approximate Total # Vehicles Received Per Year: _____

Approximate Total # Vehicles Removed Per Year: _____

Total # Employees: _____

Federal Employer ID Number (FEIN): _____ Days and
Hours of Operation:

Total Yrs. in Operation (former and current owners):

Prior Use of Facility Location (if different): _____

Building Size: _____ ft. X _____ ft.

Paved Parking Area: _____ ft. X _____ ft.

Are you certified with any other program or organization (regulatory/industry)? If so,
please explain:

This document is a **fillable** PDF. For best results, download this
file and open with Adobe Reader.
Don't have Adobe Reader? Get the free version by **clicking here!**

Which of the following are in service at your facility? (please check all that apply)

- | | |
|---|--|
| <input type="checkbox"/> Public Water Supply | <input type="checkbox"/> On-site Drinking Water Well |
| <input type="checkbox"/> Public Sewer System | <input type="checkbox"/> Septic System/Leachfield |
| <input type="checkbox"/> Floor Drain to Holding Tank | <input type="checkbox"/> UIC Authorized Discharge |
| <input type="checkbox"/> Floor drain to other location (please specify) _____ | |

Which of the following best describes your facility operations? (please check all that apply)

- | | | |
|--|--|--------------------------------------|
| <input type="checkbox"/> Dismantler/Recycler | <input type="checkbox"/> Towing Yard | <input type="checkbox"/> Auto Dealer |
| <input type="checkbox"/> Auto Repair/Service | <input type="checkbox"/> Auto Body or Rebuilder | |
| <input type="checkbox"/> Shredder/Processor | <input type="checkbox"/> Other (please specify: _____) | |

Which of the following describes vehicle crushing at your facility? (please check all that apply)

- | | |
|---|---|
| <input type="checkbox"/> This facility does NOT crush vehicles | <input type="checkbox"/> Vehicles are taken to another site to be crushed |
| <input type="checkbox"/> Vehicles are crushed at this facility | <input type="checkbox"/> The crusher sits on a concrete/asphalt pad |
| <input type="checkbox"/> Vehicles are crushed on-site using our own dedicated crusher | <input type="checkbox"/> The crusher is covered or indoors |
| <input type="checkbox"/> The crusher sits on the bare ground | |

Which of the following licenses and permits do you hold? (please check all that apply)

- ☐ Auto Wrecking & Salvage Yard License from the RI Department of Business Regulation
- ☐ Salvage Rebuilder License from the RI Department of Business Regulation
- ☐ Auto Body License from the RI Department of Business Regulation
- ☐ Second Hand Dealers License from the City or Town
- ☐ Auto Dealers License from the RI Department of Administration

Other than motor vehicles, does your facility receive any other type of solid waste, such as appliances, other scrap metal, or demolition debris?

- ☐ No ☐ Yes (please specify type(s)) _____

Which of the following parts/components are removed from the vehicles and separately managed? (check all that apply)

- | | |
|--|--|
| <input type="checkbox"/> Air Bag Assemblies | <input type="checkbox"/> Anti-Freeze |
| <input type="checkbox"/> Batteries | <input type="checkbox"/> Brake Fluid |
| <input type="checkbox"/> Catalytic Converters | <input type="checkbox"/> CFC's (Chlorofluorocarbons)/Freon |
| <input type="checkbox"/> Fuel Tanks | <input type="checkbox"/> Lead Parts |
| <input type="checkbox"/> Mercury Switches | <input type="checkbox"/> Oil Filters |
| <input type="checkbox"/> Tires | <input type="checkbox"/> Used Oil (check all that apply): |
| <input type="checkbox"/> Windshield Washer Fluid | <input type="checkbox"/> <i>Transmission Fluid</i> <input type="checkbox"/> <i>Crankcase Oil</i> |
| <input type="checkbox"/> Drive Train/Engine | <input type="checkbox"/> <i>Power Steering Fluid</i> |
| <input type="checkbox"/> Other: _____ | |

2019 Compliance Certification

Checklist Checklists for Specific Areas



A. Air Pollution Control – Page 11 in Certification Workbook	Yes No
i. Do you conduct any automobile refinishing?	
ii. Do you clean any parts at your facility in equipment containing organic solvents? If so, please list the cleaning solvents that are used and the equipment the parts are cleaned in: _____	
iii. Do you have a boiler, furnace or space heater in which you burn any used oil by itself or mixed with your regular fuel?	
iv. Do you melt or burn any materials to recover metals at your facility?	
v. Do you burn any materials such as paper, wood or cardboard, etc., at your facility (not including the waste oil mentioned above)?	
vi. Do any operations at your facility because dust to be generated that would travel beyond your property lines? If so, do you apply chemicals or liquids, other than water, to control the dust? Please note any used: _____	
vii. Do you have any operations that produce smoke or odors?	
viii. If you answered "Yes" to any of the questions above and have questions or concerns about any air related issues, have you contacted RIDEM/OTCA to discuss these activities?	
Please refer to Section 3.A in the Workbook for additional information.	

B. Freon/Refrigerant Recovery - Page 13 in Certification Workbook	Yes No
i. Do you remove air conditioner units from the motor vehicles that come into your facility?	
ii. Is Freon properly recovered and recycled prior to scrapping or crushing vehicles?	RTC
iii. Are your technicians EPA-certified?	RTC
iv. Do you use EPA-approved refrigerant recovery equipment?	RTC
v. Do you recycle refrigerants either on-site or off-site? If "Yes", please describe how you recycle: <hr/>	
vi. Do you ensure that refrigerants are not vented into the air? (e.g. make sure that all AC unit openings are sealed after evacuation to prevent leaking of residual refrigerant; make sure that storage tanks are not overfilled)	RTC
Please refer to Section 3.B in the Workbook for additional information, or contact US EPA New England staff: Abdi Mohamoud (617) 918-1858	

C. Antifreeze Management - Page 14 in Certification Workbook	Yes No
i. Do you ship any collected antifreeze to an off-site recycling company?	
ii. Do you ship any collected antifreeze to an off-site disposal company?	
iii. Is the antifreeze collected in containers that are in good condition and in such a way to minimize spills and leaks? (see Section 3.C in manual for explanation)	
iv. Is any antifreeze discharged to either the sewer or septic line? (If "Yes", go to v; if "No", go to vi)	
v. If you discharge antifreeze, do you have a permit? If so, from which agency? _____	<div>RTC</div> <div>N/A (no discharge)</div>
vi. Do you always avoid dumping antifreeze on the ground or placing it in the trash?	<div>RTC</div>
vii. Is any antifreeze reused as engine coolant (filter, test and recycle)?	
viii. Do you give or sell recovered antifreeze to customers?	
Please refer to Section 3.C in the Workbook for additional information.	

D. Lead Acid Batteries – Page 16 in Certification Workbook	Yes No
i. Do you test the batteries that are removed from vehicles to determine if they are to be reused, recycled or disposed of?	
ii. Do you store used lead acid batteries in a safe manner to prevent spills and leaks? ("Safe" meaning indoors, stacked not more than 5 batteries high, in either a closed, leak-proof container or on a curbed, coated or lined concrete surface with spill controls such as drip pans, lime/baking soda kits to neutralize any acid leaks)	
iii. Do you inspect the stored batteries for leaks and cracks on a weekly basis?	
iv. Do you send used lead acid batteries to an off-site recycling facility? If so, please name the facility: _____	
v. Do you send used lead acid batteries to an off-site disposal facility? If so, please name the facility: _____	
vi. If disposed of, as opposed to recycling, usually due to condition, do you manage the unusable batteries as a universal waste, or hazardous waste, if necessary?	
vii. Approximately how many lead acid batteries do you collect annually?	_____
viii. Have you completed a one time Land Disposal Restriction Notification identifying the facility that receives your batteries for recycling and submitted the form to the EPA?	

E. Fuel/Gasoline, continued	Yes No
viii. Do you inspect the containers weekly to check for leaks?	
ix. Is any fuel safely reused on-site (ie. in facility vehicles or equipment)?	
x. Do you ship any unused fuel to a recycling or disposal facility? If so, please note name of facility: _____	
xi. Is gasoline given to employees?	
<p>Please refer to Section 3.E in the Workbook for additional information.</p>	

F. Auto Mercury Switches - Page 21 in Certification Workbook	Yes No
i. Do you remove mercury switches from vehicles? a. hood/trunk convenience light switches b. anti-locking brake switches	<div>RTC</div>
ii. Do you store the removed switches in a heavy-duty plastic container?	
iii. Do you store the container in a safe place, and label the container properly to prevent misuse and exposure to workers, in accordance with the universal waste rule?	<div>RTC</div>
iv. Do you send the switches to a recycling company? If so, please note the name of the company: _____	
v. Do you send the switches to a disposal company (necessary due to condition, such as a damaged or leaking switch)? If so, please note the name of the company: _____	
vi. Are the switches shipped in accordance with the universal waste rule?	<div>RTC</div>
vii. Do you remove other mercury-containing parts such as display screens from DVD players and navigation system sources?	
viii. Approximately how many auto mercury switches do you remove and collect annually?	<div>_____</div>
Please refer to Section 3.F in the Workbook for additional information.	

G. Waste Tires - Page 24 in Certification Workbook	Yes No
i. Do you store waste tires at your facility? If "No", skip to Section H.	
ii. Do you store the tires outside?	
iii. Do you store tires in a trailer, shed, or other container such as a rolloff?	
iv. Do you take the tires off the rims?	Both
v. Do you send the tires to a <i>recycling</i> facility? If so, please note name of facility: _____	
vi. Do you send the tires to a <i>disposal</i> facility? If so, please note name of facility: _____	
vii. Do you store more than 400 tires at any given time? If "No", skip to Section H. If "Yes", are you licensed to operate a vehicle tire storage and recycling facility?	RTC
viii. Do you store tires for periods of six (6) months or less?	RTC
ix. Do you store tires in piles? If so, are the tire piles lower than 20 feet in height?	RTC
x. Are the tire piles less than 200 feet in length and 50 feet in width?	RTC

G. Waste Tires, continued		Yes	No
xi.	Are the tire piles located more than 50 feet between piles, and away from buildings and other structures?		RTC
xii.	Are the tire piles located more than 200 feet from property lines?		RTC
xiii.	Do you cover outside tire piles or provide for other mosquito control? If "Yes", please note mosquito control method: _____ _____		RTC
xiv.	Do you store tires in a way that prevents fires and allows for fire control if needed? (e.g. easy access to water supply; removal of weeds, trees and other items to allow access for fire fighting equipment)		RTC
xv.	Do you shred or cut tires into smaller pieces? If "Yes", do you store tire chips (8 inches in size and less) in piles that do not exceed 200 feet in length, 150 feet in width and 20 feet in height?		RTC
Please refer to Section 3.G in the Workbook for additional information.			

H. Used Oil - Page 27 in Certification Workbook	Yes No
i. Is used oil stored in tanks or containers that are in good condition with proper spill control measures?	RTC
ii. Do you label the containers as "Used Oil"?	RTC
iii. Do you mix used oil with other non-oil wastes? If so, with what: _____	
iv. If used oil filters are removed, are they properly managed by draining, and proper recycling with documentation?	RTC
v. Please indicate how the recovered oil is stored: a. Outdoor, above ground tanks ----- b. Outdoor, underground storage tanks ----- c. Outdoor drums ----- d. Outdoor, other containers: _____ If yes to c. and/or d., are they stored on an impervious surface under a roofed structure? e. Indoor, above ground tanks ----- f. Indoor, underground storage tanks ----- g. Indoor drums ----- h. Indoor, other containers: _____ Underground Storage Tanks (if used, they must be registered with RIDEM)	RTC
vi. Do you ship used oil to a re-refining, recycling, or disposal company? If "Yes", please note name of company: _____	

H. Used Oil, continued	Yes No
vii. Do you avoid using oil to suppress dust on your property?	RTC
viii. Do you burn used oil to heat your building? If "No", skip to ix. If "Yes", is the burner capacity less than 500,000 BTU's? If "Yes", skip to ix. If the burner capacity is greater than 500,000 BTU's, have you complied with the regulatory requirements outlined in RIDEM Hazardous Waste Rule 1.16.3.A(3) or A(4), as appropriate for the burner capacity?	RTC
ix. Do you use oil for any purpose on-site besides heating purposes? If so, please note: _____	
x. How much used oil do you generate annually (including used oil burned on-site in waste oil burners)? How much used oil do you ship off-site annually?	_____ <u>Gallons</u> _____ <u>Gallons</u>
Please refer to Section 3.H in the Workbook for additional information.	

I. Wastewater Discharge - Page 30 in Certification Workbook	Yes No
<p>i. Is process wastewater generated by any of the following business activities (sanitary wastewater from toilets and hand washing is not considered process wastewater)? If the answer is "No" to all questions, then skip to ii.</p> <p>a. steam cleaning -----</p> <p>b. power washing -----</p> <p>c. flushing radiators -----</p> <p>d. painting -----</p> <p>e. other process operations</p> <p>_____</p>	
<p>ii. Do you manage any process wastewater as hazardous waste?</p>	
<p>iii. Is any process wastewater treated or reused on-site? (Methods of treatment include but are not limited to filtration, oil/water separation, evaporation, etc.).</p>	
<p>iv. Are any floor trenches or floor drains located in the facility? (If "Yes", please answer below)</p> <p>a. Do you know where the drain discharges to? If known, please indicate (ground outside, drywell, cesspool, septic system, leach field, sewer)</p> <p>_____</p> <p>b. What kind of fluids might be discharged into the floor drain (wash water, other fluids)?</p> <p>_____</p>	<p>RTC</p>

I. Wastewater Discharge, continued	Yes No
<p>v. Does any process wastewater go into a drywell, cesspool, septic system, leach field, onto the ground outside, or otherwise potentially impact groundwater?</p> <p>If "Yes", does your facility have a RIDEM permit to discharge waste water in this manner?</p>	<p>RTC</p>
<p>vi. Does any of your process wastewater go into a public sewer system?</p> <p>If "Yes" does your facility have a municipal permit to discharge waste water in this manner?</p>	<p>RTC</p>
<p>vii. Is any process wastewater discharged into surface waters, including a stream, river, waterway, pond, lake or wetland?</p> <p>If "Yes" does your facility have a RIDEM permit to discharge waste water in this manner?</p>	<p>RTC</p>
<p>viii. Do you have any process wastewater shipped off-site for disposal or reclaim by an outside contractor?</p>	
<p>Please refer to Section 3.I in the Workbook for additional information.</p>	

J. Stormwater Management - Page 32 in Certification Workbook	Yes No
i. At your site, are there any of the following? a. Above-ground outdoor storage tank b. Hazardous waste storage area c. Outdoor construction activities	
ii. Does your site generate a point-source of stormwater discharge? (Point sources include confined conveyances such as a pipe, drain, ditch, channel, and may even include a graded lot). If "Yes", do you have a RIDEM permit?	RTC
iii. Does precipitation (rain/snow) or runoff come into contact with any of your business activities or materials? a. Holding area for incoming vehicles ----- b. Dismantling area ----- c. Fluid removal area ----- d. Fluid storage area ----- e. Engine and transmission storage area ----- f. Battery storage area ----- g. Tire storage area ----- h. Vehicle storage area ----- i. Core storage area ----- j. Scrap storage area ----- k. Pressure washing area ----- l. Parts cleaning area ----- m. Painting area ----- n. Crushing area ----- o. Soil erosion area ----- p. Vehicle and equipment maintenance area ----- (fixing, fueling, cleaning) q. Sandblasting area ----- r. Dumpster contents----- s. Other _____	

J. Stormwater, continued		Yes	No
iv.	<p>(a) Does the stormwater discharge directly to a surface water (wetland, pond, river, cove, etc.)? If so, which one: _____</p> <p>(b) Do you collect stormwater by pipes or swales, channels, etc., and discharge directly to groundwater by either a surface basin or an underground filtration practice (UIC)?</p> <p>If "Yes" to (a) and/or (b), do you have a permit from RIDEM?</p>		RTC
v.	<p>Does the stormwater discharge directly to a municipal storm water collection system?</p> <p>If so, which one: _____</p> <p>If "Yes", do you have a permit from RIDEM?</p>		RTC
vi.	<p>Does the primary activity at your facility meet one of the following definitions?</p> <p>a. primarily engaged in the distribution and wholesale of used motor vehicle parts, including dismantling motor vehicles for the purpose of selling parts (SIC 5015)</p> <p>b. primarily engaged in assembling, breaking up, sorting, and wholesale distribution of scrap and waste materials including auto wreckers engaged in dismantling automobiles for scrap (SIC 5093)</p>		
vii.	<p>Have you completed and submitted a Stormwater Permit Application (RIPDES) to the Rhode Island Department of Environmental Management?</p> <p>If "Yes", RIPDES Permit No. _____</p>		RTC
viii.	<p>Have you completed and submitted a "No Exposure Certification" or a "No Discharge Certification" form to the Rhode Island Department of Environmental Management?</p>		
ix.	<p>Are there any air particulates are emitted or produced from your facility which could end up on the roof or other surfaces and impact stormwater?</p>		
x.	<p>Are all of your business activities/materials that can impact stormwater located under a roof or tarpaulin?</p>		

J. Stormwater, continued	Yes No
xi. Are all business activities that can cause a spill or leak conducted on an impermeable surface where spills/leaks are cleaned up promptly?	
xii. Are all materials that are susceptible to a spill or leak located on an impermeable surface where spills/leaks are cleaned up promptly?	
xiii. Do you crush or shred any non-automotive waste streams (discarded appliances, misc. scrap metal, empty transformer casings, etc.)	
xiv. (a) Do you treat stormwater? If "Yes" , circle the method(s) that you use: 1. Detention Basin 2. Oil/Water Separator 3. Filtration Unit 4. Swirl Concentrator (Aqua-Swirl, Stormceptor, Vortechinics, etc.) 5. Deep Sump Catch Basins 6. Other: _____ (b) If Yes , were any stormwater practices required to be permitted by the Freshwater Wetlands Program, RIPDES Construction Grant Program or the Underground Injection Control Program?	
xv. Do you reuse stormwater? If "Yes" , for what purpose: _____	
xvi. Does any of your stormwater ultimately enter a public or private sewage disposal system (e.g. septic tank or leach field)?	
xvii. Do you follow a written plan such as a Stormwater Management Plan; Best Management Practices Plan; EPA Spill Prevention, Control and Countermeasure Plan or Environmental Management System to manage stormwater?	RTC
xviii. Have you sampled and analyzed your stormwater discharges, conducted quarterly routine facility inspections, completed quarterly visual monitoring of your stormwater discharges, conducted annual comprehensive site evaluations and submitted to RIDEM Annual Reports and Discharge Monitoring Reports (DMRs)?	RTC

K. Hazardous Waste - Page 37 in Certification Workbook	Yes No
i. Does your facility generate hazardous waste? If "No", skip to Section L. (Hazardous waste can come from different sources, depending on the characteristics of the waste and how the waste is managed as determined in other sections.)	
ii. Has your company evaluated all waste it generates to determine if any waste meets the definition of hazardous waste? Regarding all your waste streams, do you have appropriate documentation (i.e., analytical test records, MSDS, etc.) or process knowledge that supports your hazardous waste determination?	<div>RTC</div> <div>RTC</div>
iii. If you generate hazardous waste, do you have an EPA (generator) hazardous waste identification number? Please list number: _____	<div>RTC</div>
iv. Do you prepare a Hazardous Waste manifest for each offsite shipment of hazardous waste? Do you have proper documentation (manifests) which shows where your hazardous waste is being shipped?	
v. Are all containers kept closed when not in use (i.e., bungs kept in place, funnels are only used when needed)?	<div>RTC</div>
vi. Do you recycle hazardous waste on-site? If "Yes", list type of waste and method used for recycling: _____	
vii. How much hazardous waste do you ship off-site annually?	<div>_____ Gal/lbs.</div>

K. Hazardous Waste, continued		Yes	No
xi.	Are you shipping your hazardous waste off-site according to the 90/180/365-day storage time limit?		RTC
xii.	For LQGs and SQGs, if the 90/180 storage area contains ignitables, please answer below; if "No", proceed to next question. i. Is the area separated from sources of ignition? ii. Are "No Smoking" signs posted in the area? iii. Is the area located at least fifty (50) feet from the property line? iv. Are drums of ignitable waste electrically grounded?		N/A-CESQG RTC RTC RTC RTC
xiii.	Does your facility contain and maintain (per manufacturing specification) emergency equipment designed to help reduce the possibility of an explosion, fire or accidental release of hazardous materials?		RTC
xiv.	If applicable, does your facility have a <u>written</u> contingency plan designed to help reduce hazards associated with the possibility of an explosion, fire or accidental release of hazardous materials?		RTC N/A-SQG or CESQG
xv.	Has this plan been submitted to local emergency response providers (e.g. local police, fire departments)?		RTC N/A-SQG or CESQG
xvi.	Does your facility have an employee training program that teaches them proper hazardous waste management procedures, including how to implement the contingency plan?		RTC N/A-CESQG or satellite storage only
xvii.	Does your facility have records indicating that an employee training program is occurring?		RTC N/A

K. Hazardous Waste, continued

xviii. Please list the type(s) of hazardous waste generated at your facility:

1. _____

2. _____

3. _____

4. _____

5. _____

6. _____

7. _____

8. _____

9. _____

10. _____

11. _____

12. _____

Please refer to Section 3.K in the Workbook for additional information.

L. Other Fluid Management – Page 51 in Certification Workbook	Yes No
i. Do you store all new liquids indoors?	
ii. Do you store all new liquids outdoors under a roof?	
iii. Do you store all liquid wastes in leak-proof containers?	
iv. Do you store the waste containers indoors?	
v. Do you store the waste containers outdoors under a roof?	
vi. Do you inspect the containers and storage areas often for leaks and spills?	
vii. Are all containers clearly labeled with the proper information, identifying the contents?	
viii. If any vehicles are crushed on-site, is any resulting residual liquid waste properly managed?	RTC
ix. Is all windshield washer fluid re-used, recycled, or managed for proper off-site disposal?	
x. Is brake fluid disposed of properly? Please explain: _____	
xi. Excluding used oil or fuel, do you store any chemicals or fluids in: Outdoor, above ground tanks ----- Outdoor, underground storage tanks ----- Indoor, above ground tanks ----- Indoor, underground storage tanks -----	
Please refer to Section 3.L in the Workbook for additional information.	

Certification Statement

Note: Complete all required Return-to-Compliance Plans (RTC) before signing this statement!

I _____, hereby certify to the following:

- I) That I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certification statement;
- II) That, based on my inquiry of those individuals responsible for obtaining the information, the information contained in this submittal is, to the best of my knowledge, true, accurate and complete;
- III) That systems to maintain compliance are in place at the facility and will be maintained for the next three (3) years even if processes or operating procedures are changed over the course of this time; and
- IV) That I am fully authorized to make this attestation on behalf of this facility.

I certify that the information that I have provided in this form is true, accurate and complete, to the best of my knowledge.

Signature: _____ Date: _____

Printed Name: _____ Title: _____

Source of Signatory Authority: ☐ Owner

(other, Please indicate)

If a Corporation: ☐ President ☐ Secretary ☐ Treasurer
☐ Vice President (If authorized by corporate vote.)
☐ Representative of the above (If authorized by corporate vote and if responsible for overall operation of the facility.)

If a Partnership: ☐ General Partner

If a Sole Proprietorship: ☐ Proprietor

Return this form to: RI DEM/Office of Customer & Technical Assistance
Auto Salvage Yard Facilities Certification Program
235 Promenade Street
Providence, RI 02908-5767

Return the completed checklist by November 15, 2019

Rhode Island Department of Environmental Management
Auto Salvage Facilities Certification Program
2019 Return-to-Compliance Plan Form



- Please answer all questions in the table for each non-compliance issue.
- Only submit a Return-to-Compliance Plan for violations that you were unable to correct BEFORE certifying.
- Completing this form does not relieve the facility of its affirmative responsibility to operate in compliance with applicable regulations. Failure to operate in full compliance with the applicable regulations may result in enforcement actions, which may include fines or penalties.

Facility Name: _____

Please note that submittal of this **RTC Form** gives your facility an additional 60 days to come into compliance.

Checklist Compliance Question # for which you are reporting non-compliance?	Brief description of requirement and the workbook section #.	What corrective action will you take to return to compliance?	Date you expect (must be within 60 days) to be in compliance with issue?

Signature: _____ Date: _____

Printed Name: _____ Title: _____

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Rhode Island Department of Environmental Management
Auto Salvage Facilities Certification Program
2019 Return-to-Compliance Final Report



- Before you complete this form, make as many copies of this form as needed. Please list the date and what action will be taken for EACH non-compliance issue listed in the RTC form that was originally submitted with the checklist. Return the completed form to:

RI DEM/Office of Customer & Technical Assistance
Auto Salvage Facilities Certification Program
235 Promenade Street
Providence, RI 02908-5767

- Completing this form does not relieve the facility of its affirmative responsibility to operate in compliance with applicable regulations. Failure to operate in full compliance with the applicable regulations may result in enforcement actions, which may include fines or penalties. Please answer all questions in the table for each non-compliance issue.

Facility Name: _____

Checklist Compliance Question # for which you reported non-compliance?	Brief description of requirement and the workbook section #.	What corrective action did you take to return to compliance?	Date that facility returned to compliance with this issue?

Signature: _____ Date: _____

Printed Name: _____ Title: _____