



**Hazardous Waste Generation Concerns  
Affecting Autobody Shops**

**What is Hazardous Waste?**

Rhode Island’s General Laws define *hazardous waste* as “any waste or combination of wastes of a solid, liquid, contained gaseous, or semisolid form which, because of its quantity, concentration, or physical, chemical, or infectious characteristics may: (a) Cause or significantly contribute to an increase in mortality or increase in serious irreversible or incapacitating reversible illness; or (b) Pose a substantial present or potential hazard to human health or the environment.” The Laws also define *hazardous waste management* as “the systematic control of the collection, source separation, storage, transportation, processing, treatment, recovery, and disposal of hazardous wastes.” Federal and state environmental laws dictate that the management of such waste must be handled in a safe and responsible way. In other words, proper hazardous waste management should be undertaken from “cradle to grave.” In the autobody shop, hazardous wastes include parts-cleaning solvents, rags contaminated with solvents, waste paint, and paint-stripping waste.

**Knowing the Law...What Does Rhode Island Require?**

**Drum/Container Storage and Labelling**

Most hazardous waste violations that occur in an autobody shop are due to improper container storage procedures. By taking a few moments to review your shop’s hazardous waste container policy, you will

be helping to keep the air cleaner, keep your employees healthier, and keep yourself out of trouble with environmental regulators.

As generators of hazardous waste, all autobody shops are required by the Department of Environmental Management (DEM) to complete a Notification of Regulated Waste Activity Form and obtain a permanent U.S. Environmental Protection Agency (EPA) Identification Number. If you don't already have this number, a form can be obtained from DEM’s Office of Compliance and Inspection at (401) 222-1360.

A person can generate up to 55 gallons of hazardous waste at or near the source that it was created. The duration of time it takes to fill up one 55 gallon container (usually a “drum”) at or near the point of generation is known as “satellite storage.” There is no time limit as to how long one can take to fill up a 55 gallon container to capacity in satellite storage. Hazardous waste accumulated as satellite storage must be marked with the words “Hazardous Waste” or described as another type of “Waste,” such as “Waste Paint” or “Waste Oil.” It is also important to keep in mind that, unless it is in the process of being filled, a hazardous waste container must be kept closed at all times (that is, in the case of a closed-head drum, the bung must be in place and screwed all the way down).

Once the 55 gallon hazardous waste container has been filled to capacity and sealed, DEM requires that the container be labeled with the

following information:

- the words “Hazardous Waste”
- the hazardous waste generator’s name and address
- the DOT shipping name; and the name of the main hazardous waste ingredients, if the shipping name is not descriptive (e.g.; “hazardous waste liquid,” “Not Otherwise Specified”).
- the waste code(s)
- the date that the container has been filled to capacity and sealed

The container or drum must then be moved to a designated (or central) storage area within 3 days of becoming full. The shop has 90 days in which to dispose of the container properly. During the 90 day time limit, drums which contain liquid hazardous waste must be stored in an area or device which can collect the contents from the drum in case it ruptures and leaks. Storage of this type is known as “secondary containment.” Examples of secondary containment include:

- putting the container into a bermed area without floor drains
- double-walled containers
- placing the container within a larger non-porous (“packed”) container, or,
- placing the container on top of a



special non-porous type of pallet known as a “spill pallet.”

Secondary containment is not necessary for solid hazardous waste storage.

Hazardous waste held in 90 container storage must also be inspected on a weekly basis. In order to ensure that the person performing the inspection has adequate access to the containers and the labels on each one, sufficient aisle space must be created; this is to avoid unnecessary climbing onto or squeezing in between the drums. Drums should never be stacked on top of each other. Records of the inspections must be kept at or near the facility and be available for inspection, if requested.

Follow all local fire regulations regarding the proper handling of ignitable hazardous wastes. This may include storing these types of wastes a certain distance from the property line, or grounding the containers that house the materials in order to prevent ignition from static electricity or a spark.

Finally, it is required by law that you have your hazardous waste hauled away by a licensed hazardous waste transporter. You must also use a hazardous waste manifest to ship these wastes. If you're not sure if your transporter is licensed or you need Hazardous Waste manifests, you can call DEM's Office of Waste Management for assistance.

## Storing and Mixing Autobody Paints and Solvents

As new paints, solvents, and other hazardous materials arrive at the shop, it is important that they be stored properly in order to prevent spills and fire hazards. Make sure that the materials arrive in containers that have not been opened or dam-

aged, and store the new products in an area which protects them from excessive heat, cold, and dampness. Paints and solvents should have legible labels and should not be stacked on top of each other. Follow label guidelines and accompanying Material Safety Data Sheets (MSDSs); these should provide information for the proper storage of materials that may be flammable or that could react with other nearby materials and cause an explosive or corrosive scenario.

When mixing paints and solvents, follow the directions in order to avoid wasting the materials and to assure a safer working environment:

- Mix materials in the right order; for instance, when mixing with water, add concentrated materials to water, not water to the concentrated materials.
- Avoid mixing the unmixable. For example, mixing aqueous, inorganic substances with organic substances (such as paint thinners) or mixing low pH materials with high pH materials can create heat which could cause a combustible situation. For the same reason, never intermix paint thinners, part washing degreasers, and waste oils with each other.
- Wear protective clothing when mixing, such as safety eyewear, respirators, and gloves.
- Have a spill plan in place in case of an accident.

## Spills

It is important to know what to do before a hazardous material spill occurs. If a spill occurs, notify your supervisor and employees working near the area. Block off the area, and avoid walking through the spill to prevent injury to yourself or tracking the spill contents to other areas of the shop. When cleaning up a spill that does not present an immediate danger

to human health, keep these simple guidelines in mind:

- Remove anything nearby, such as a heat source, which might cause the spill to catch fire.
- Wear safety gear, such as gloves, respirators and goggles, to avoid skin, eye, and/or lung contact.
- Be familiar with what clean-up materials should be used for the spill and where they are located in the shop. MSDSs can provide valuable information on how to safely handle the spill.

Because hazardous material spills may pose a health risk to you and others around you, it is important that such hazards are cleaned up and disposed of properly. Most likely, hazardous spills and the materials used to clean them up cannot be hosed down the drain or tossed in the trash. In fact, spills may require written and/or verbal notification to state authorities, and they probably have to be disposed of in accordance with DEM's hazardous waste regulations.

**This “Plain English” fact sheet is provided solely as a guidance for understanding Hazardous Waste Management in the Automobile Refinishing Industry. It does not constitute a comprehensive document and should not serve as a substitute for actual hazardous waste policies. For more information on DEM's hazardous waste rules and regulations, contact DEM's Office of Waste Management at (401) 222-2797.**

