



THE COMPASS



New Directions in Compliance Assistance



Fall 2008



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San Francisco

May 4-7, 2009

www.environmentalsummit.org

More details on page 15.



Improving Environmental Performance at Automotive Recycling Facilities

Americans depend on an estimated 243 million passenger vehicles to meet their ground transportation needs. Once these vehicles reach the end of their useful life, they are sent to one of the nation’s 7,000 vehicle salvage/recycling operations. Automotive recycling facilities can vary in size from a small warehouse to a major manufacturing facility.



Incoming vehicles should be inspected, drained and dismantled in one area, on an impervious surface such as a concrete pad, and under a cover or roof. *(Photo courtesy of NH DES, from EPA Region 1)*

Every year, these facilities help to recycle over 11 million retired vehicles. Just about everything in an automobile—from floor mats and instrument panels to upholstery, aluminum and steel—can be recycled for use in a new automobile or another consumer product. The automobile is the most recycled consumer product in the world today making automotive recycling a \$25 billion/year business sector, the 16th largest industry in the United States. Approximately 84% of each vehicle (by weight) is currently recycled. During this recycling process, 6 million tires are recycled, enough steel is recovered to produce almost 13 million new automobiles; and the usable auto parts that are recovered save an estimated 11 million gallons of oil that would otherwise be needed to manufacture new parts.

When done carefully, automotive recycling helps preserve natural resources and reduce demand for scarce landfill space. But the automotive recycling process also has the potential to release toxic materials to the air, water and soil. Automotive recyclers must abide by stringent local, state, and national regulations on dealing with waste generated by salvaged automobiles. Many automotive recyclers have instituted their own unique programs to further reduce the potential effects of harmful materials to their businesses, workers, *(Continued on page 2)*

Environmental Performance at Auto Recycling Facilities (continued from page 1)

and communities. This newsletter presents information on the environmental requirements for automotive recycling facilities, and where you can find more information, success stories, and tools for improving environmental performance at these facilities.

Auto recyclers that institute environmental improvements can also yield financial gains by operating more efficiently. Keeping track of usable parts and waste materials helps you to better market your products and avoid environmental compliance problems. Read about how Brown's Auto Salvage did that on the EPA Region 1 web site (<http://www.epa.gov/region1/assistance/salvageyard/stories/browns.html>).



Environmental Requirements

Automotive recycling facilities are subject to many environmental requirements because many of the materials they handle have the potential to adversely impact human health and damage the environment. Fluids, refrigerants (e.g. Freon), tires, mercury, batteries, and other wastes must be carefully managed according to regulatory requirements. Specific regulations also apply to tanks, vehicle crushers, and stormwater. Fortunately, the U.S. Environmental Protection Agency (EPA) and many states have prepared materials to help automotive recyclers understand and comply with their environmental requirements and also how to use best management practices (BMPs).

One of the key tools available for automotive recyclers is the Environmental Compliance for Automotive Recyclers (ECAR) Center. The Internet-based ECAR Center will help you find out exactly how to comply with environmental regulations, protect the environment, and run your business more efficiently. ECAR was developed by the Automotive

Recycler's Association with support from EPA. Because many environmental requirements vary by state, the ECAR Center

provides environmental compliance information by state. Find out more about ECAR on page 9 of this newsletter.

Many states, such as California, Florida, North Carolina, Ohio, and Rhode Island have developed guidance manuals, compliance checklists, and more for auto recycling facilities. Several of these tools are described in the Success Stories and Tools sections of this newsletter. (Continued on page 4.)

Florida's "Golden Rules" to becoming a green auto recycler:

1. New arrivals are checked for fluid leaks and batteries are removed.
2. Core storage areas are regularly checked to make sure fluids are not leaking onto the ground or exposed to rainwater.
3. Used oil tanks/containers are labeled "Used oil" and inspected regularly for good condition.
4. Antifreeze tanks/containers are labeled as "good antifreeze" or "waste antifreeze" and inspected regularly for good condition.
5. Gasoline tanks/containers are labeled "good gasoline" or "waste gasoline" and inspected regularly for good condition.
6. All drums and storage containers are marked with proper contents—NO mystery drums.
7. A Stormwater Pollution Prevention Plan (SWPPP) has been developed and implemented, if required. (A SWPPP is usually required.)
8. Batteries are stored inside on a pallet or outside in a leak-proof container away from traffic areas.
9. Refrigerant recovery machines (R12 and R134a) are in working condition and in good repair.
10. Disposal records for used oil, waste gasoline, batteries, refrigerant, etc. are maintained in order at a central location on site for a minimum of three years.
11. Spills are addressed immediately and any contaminated soils are removed quickly and stored in a separate, labeled container.
12. Waste tires are stored in a central location and never allowed to exceed 1,500 without a permit.



A Word from the Director...

This issue of the Compliance Assistance *COMPASS* focuses on environmental issues associated with automotive recycling facilities and ways to manage operations both to comply with environmental requirements and to prevent or reduce impacts to human health and the environment.

In this issue you will read about the steps EPA, states and the City of Philadelphia have taken to keep auto recycling facilities operating “clean and green” and to protect the environment. There are many information resources, especially in the Tools section starting on page 9, to help automotive recycling facilities find the information they need to understand the environmental requirements that apply to their operations.

Fluids, refrigerants, tires, mercury, batteries, and other wastes must be carefully managed according to regulatory requirements. Specific regulations also apply to tanks, vehicle crushers, and stormwater. While it can be a challenge to keep up with federal, state, and local requirements, this newsletter will point you toward many easy-to-find and easy-to-use informational tools that will help you understand and comply with these requirements. These tools may also help you reduce or prevent pollution in the community where you work and live since many auto recycling yards are small, locally-owned businesses.

The COMPASS is published by EPA’s Office of Enforcement and Compliance Assurance, Office of Compliance to provide compliance assistance information to the regulated community and for further distribution by environmental assistance providers. We welcome your feedback and suggestions for future editions of *The COMPASS*. Contact: Catherine Tunis, Editor, at tunis.catherine@epa.gov.



One of the central tools available for automotive recyclers is the Environmental Compliance for Automotive Recyclers (ECAR) Center (<http://www.ecarcenter.org/>), one of 16 EPA-sponsored on-line Compliance Assistance Centers (<http://www.assistancecenters.net>). The ECAR Center will help you find out exactly how to comply with environmental regulations, protect the environment, and run your business more efficiently too! And it is available 24/7 on your computer.

We hope you find this newsletter informative and useful for sharing information among automotive recycling facilities and the many providers of compliance assistance. Our next edition of *The COMPASS* will focus on environmental issues related to importing and exporting, including environmental issues related to ports.

We welcome your comments and look forward to receiving your feedback on this edition as well as stories to include in our next edition. You can contact Catherine Tunis with your ideas and comments at (202) 564-0476 or by e-mail at tunis.catherine@epa.gov.

Sincerely,
Jim Edward, Director
Compliance Assistance and
Sector Programs Division
EPA’s Office of Compliance
edward.james@epa.gov



Environmental Performance at Auto Recycling Facilities (cont. from page 2)

Mercury Switches are a Serious Concern

Mercury-containing light and brake switches in end-of-life vehicles are of special concern because mercury can cause severe and permanent damage to your brain and nervous system. If vehicles with mercury-containing switches are sent to the shredder and melted into new steel, the mercury can get into the air and then be washed into our waterways. There the mercury bioaccumulates in the food chain.

Children and developing fetuses are especially vulnerable to brain and nervous system damage from mercury. A pregnant woman can expose her fetus to an unsafe dose of mercury by eating one-half can of chunk light tuna per day.¹



As of 2005, there were approximately 150 to 250 million mercury light and brake switches—containing about 150 tons of mercury—in vehicles. Removing mercury switches from vehicles can cut mercury emissions in half from electric arc furnaces—where shredded scrap vehicles are made into new steel. It takes an average of 48 seconds to remove a mercury-containing switch.

About thirty states have mercury switch removal programs. Many of these states require the removal of mercury-containing switches, including Arkansas, California, Iowa, Maine, Minnesota, New Jersey, New York, North Carolina, Oregon, Rhode Island, Utah, and Virginia. In some of these states, the entire vehicle becomes hazardous waste if the mercury-containing switches are not removed. Most states with mandatory programs require auto manufacturers to pay auto recyclers for each switch recovered to compensate for labor costs. Auto recyclers can find state requirements on the internet.

EPA issued new air emissions standards in January 2008, that require steel manufacturers using electric arc furnaces to buy motor vehicle scrap from providers that participate in an EPA-approved program for the removal of mercury-containing switches. The standards are expected to reduce emissions of mercury and other toxic metals such as lead, manganese, nickel and chromium. See http://www.epa.gov/ttn/oarpg/t3/fact_sheets/eaf_fs_1_21707.html.

In 2006, EPA worked with the Automotive Recyclers Association, the Environmental Council of States, auto manufacturers, steelmakers, dismantlers, and shredders to develop the National Vehicle Mercury Switch Recovery Program (NVMSRP), a national effort to prevent mercury pollution through the removal and recycling of mercury switches. Learn more about the NVMSRP on page 7.

Links to Some State Requirements to Remove Mercury Switches From End-of-life Vehicles:

Arkansas http://www.adeq.state.ar.us/solwaste/branch_programs/wt_mercury_switch_program.htm

California <http://www.dtsc.ca.gov/HazardousWaste/Mercury/> and http://www.dtsc.ca.gov/HazardousWaste/Mercury/upload/HWMP_Mercury-Removal_BMPs.pdf

Iowa <http://www.iowadnr.com/waste/recycling/mercury.html>

Maine <http://janus.state.me.us/legis/statutes/38/title38sec1665-A.html>

New Jersey http://www.njleg.state.nj.us/2004/Bills/A2500/2482_11.PDF

North Carolina http://wastenot.enr.state.nc.us/HWHOME/MercurySwitch/NC_Switch_Mgt.htm

Oregon <http://www.deq.state.or.us/lq/mercuryswitchout.htm>

Rhode Island <http://www.dem.ri.gov/programs/benviron/assist/abp2fact.htm#mercury> and <http://www.rilin.state.ri.us/Billtext/BillText06/HouseText06/H8220aa.pdf>

Utah <http://www.hazardouswaste.utah.gov/Rules/Adobe/HazardousWasteRules/R315-017.pdf>

Virginia <http://www.deq.state.va.us/waste/mercuryswitch.html> and <http://www.deq.virginia.gov/p2/mercury/automotiveswitches.html>

¹ Healthcare Without Harm, Environmental Working Group, *Protecting by Degrees—What Hospitals Can Do to Reduce Mercury Pollution*. http://www.noharm.org/library/docs/Protecting_by_Degree_s_2.pdf.

Learn how to find and remove mercury-containing switches from Michigan's training video, "The 48-second Solution," at <http://www.michigan.gov/deqmercuryp2>.

Environmental Success Stories at Auto Recycling Facilities

Rhode Island's Environmental Results Program for Auto Recycling Facilities

Rhode Island's Environmental Results Program (ERP) helps auto salvage yards address multiple



Spilled fluids can contaminate soil. (Photo courtesy of ME DEP)

regulations: air pollution control, CFC/refrigerant recovery, waste water discharges, and proper management of antifreeze, lead acid batteries, fuel management, mercury switches,

waste tires, used oil, stormwater, hazardous waste, and fluid management. The ERP is a partnership of the Rhode Island Department of Environmental Management (RI DEM), US EPA, University of Rhode Island, and the Narragansett Bay Commission with funding from EPA.

The ERP features three components: 1) compliance assistance through an "Auto Salvage Yard Facilities Certification Workbook and Auto Salvage Yard Facilities Certification Checklist Package" and environmental training workshops for facilities; 2) self-certification by owners; and 3) performance measurement. The workbook provides a comprehensive overview of environmental regulatory requirements and the checklist provides a comprehensive tool to assess an auto salvage yard's compliance and implementation of BMPs.

It is easy to participate. Read the Certification Workbook and Certification Checklist Package and take any actions needed to comply and implement BMPs. Then complete the Compliance Certification Checklist and submit it to RI DEM. If a facility is not in compliance, it should also submit a plan for how and when it will come back into compliance. See <http://www.dem.ri.gov/programs/benviron/assist/asy/index.htm>. Contacts: Beth Termini, 617-918-1662 or Thomas Armstrong, 401-222-4700, ext. 4412.

Philadelphia Automotive Salvage Yard Compliance Task Force

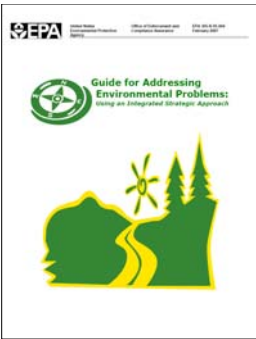
EPA Region 3, the City of Philadelphia, the Pennsylvania Department of Environmental Protection, and a number of trade associations are cooperating to address multimedia environmental concerns with scrap and automotive recycling facilities. "Proper compliance and planning avoid dangerous and destructive pollution and storm water problems, but it also saves businesses time and money while creating a clean and responsible facility," notes the Task Force website. Many facilities impact the Schuylkill River and tributaries to the Delaware River through stormwater runoff. The Task Force created compliance assistance guidance materials and workshops, a best management practices (BMP) manual, and a website to make the materials available to help facilities improve their performance. The workshops increased environmental awareness and changed operators/owners behavior. Eleven attendees requested technical assistance resulting in new Storm Water Pollution Prevention Plans (SWPPPs). Enforcement actions resulted in clean-up of hazardous waste and tire piles, improved permitting, and stormwater BMPs. The website provides links to information on laws affecting scrap dealers, BMPs, an environmental compliance checklist, and more. See <http://www.phila.gov/mdo/scrapmetal/>. Contact: David G. Byro, byro.david@epa.gov, 800-228-8711 or 215-814-5563.

EPA Region 4 Integrated Stormwater Compliance Initiative

EPA Region 4 is partnering with Florida and North Carolina in an integrated compliance initiative at auto salvage facilities. A review of permit applications found that auto salvage facilities were reporting significant pollutants in stormwater discharges, only a few auto salvage facilities had obtained the required stormwater permits, and fewer facilities were in compliance with permit conditions. An integrated initiative, also known as the strategic approach, combines compliance assistance with monitoring and enforcement to improve environmental performance in a sector. The Florida

and North Carolina initiatives and continued compliance assistance has improved environmental compliance and also protected human health and the natural environment.

EPA's *Guide for Addressing Environmental Problems: Using an Integrated Strategic Approach* provides advice and clear, step-by-step guidelines for developing an integrated strategy to address environmental problems. <http://www.epa.gov/compliance/resources/policies/assistance/strategicguide.pdf>.



In Florida, the Department of Environmental Protection (FDEP) Hazardous Waste staff worked with the Florida Auto Dismantlers and Recyclers Association to develop compliance assistance tools on hazardous waste and stormwater requirements. FDEP conducted stormwater inspections at auto recycling facilities, some together with EPA Region 4. Florida's compliance assistance web site for auto recyclers is <http://www.dep.state.fl.us/waste/categories/hazardous/pages/AutomotiveRecyclers.htm>. The *Florida Environmental Compliance Manual for Automotive Recyclers* and the associated *Compliance Self-Audit Checklist* were developed to help auto recyclers comply with environmental regulations. See page 10 of this newsletter for descriptions and links to these tools.

In North Carolina, EPA advised and trained the Carolina Auto Recyclers trade association on the requirements for storm water pollution control at auto salvage yards. Following this compliance assistance, EPA Region 4 conducted 29 inspections in the Winston-Salem region of North Carolina in early 2003. The North Carolina Department of the Environment and Natural Resources (NCDENR), in coordination with North Carolina State University's Industrial Extension Service, created a spreadsheet-based tool for permittees covered under the General Stormwater Permit for Used Motor Vehicles to aid Auto Salvage and Scrap Yard operators in developing a SWPPP. The tool contains a series of spreadsheets as an example SWPPP with instructions and a blank template that permittees can fill in to create a

SWPPP. The tool also contains instructions and helpful definitions. For both spreadsheets, stormwater manuals, and fact sheets, see http://h2o.enr.state.nc.us/su/Forms_Documents.htm#SPPPtools. Contact: Susan Pope, pope.susan@epa.gov, 404-562-9770.

Florida's Green Yards Program

The Green Yards Program teaches salvage yards to use BMPs to protect public health and the environment. The Green Yards Program was developed by DEP in connection with the Florida Auto Dismantlers and Recyclers Association in 2003. In an industry known for environmental challenges, the Florida Green Yards program helps automotive recyclers understand and comply with environmental regulations. After attending an educational workshop, facility operators submit a series of six modules documenting compliance. Automotive recyclers that achieve Green Yards designation demonstrate environmental compliance with over 35 best management practices that range from proper container labeling to developing and implementing a SWPPP.

The Green yards program developed *An Environmental Compliance Workbook for Automotive Recyclers*, a step-by-step illustrated guide available at http://www.dep.state.fl.us/central/Home/Green_Yards/Compliance_Wkb_SalvageYards.pdf, and tips for getting on the path to Green Yards, at http://www.dep.state.fl.us/central/Home/Green_Yards/Tips.htm.

Florida recently recognized the environmental commitment of Butler Auto Recycling in Pensacola by designating the facility a Florida Green Yard. "The *Green Yard* Program is the best way I have seen to get the auto recycling industry to move into the 21st century and I am proud to be one of the first," said Jim Butler, owner of Butler Auto Recycling. See www.dep.state.fl.us/p2.



Automobile Recyclers Invited to Join National Vehicle Mercury Switch Recovery Program (NVMSRP)

One of the easiest, most economical ways to reduce mercury entering the environment is to remove mercury switches from end-of-life vehicles before they are crushed, shredded, and melted into recycled steel. If the switches are not removed, large amounts of mercury can escape into the atmosphere and enter our food chain. Mercury switches are found primarily in vehicles manufactured before 2003 in hood and trunk convenience light assemblies, as well as some antilock brake systems.

Key Benefits of Removing Mercury Switches

Easy—automobile recyclers can find and remove most switches within a few minutes.

Protects public health—prevents mercury contamination of our air, land and water.

Maintains economic competitiveness—higher quality scrap for industries that use scrap metal.

Cost-effective—costs far less than steel-making emission controls.

Automobile recyclers are invited to participate in the National Vehicle Mercury Switch Recovery Program (NVMSRP), a national effort to prevent mercury pollution through the removal and recycling of mercury switches.

The MOU that established the program requires ELVS to provide participants with a collection bucket, a list of vehicles that potentially contain mercury switches, a removal brochure, instructional DVD, and detailed shipping instructions for the switches. Once the bucket is filled, participants can send it back to ELVS and ELVS will ensure the mercury is properly recycled. Automobile recyclers are offered financial incentives for three years from the 2006 start date to collect mercury switches from a \$4 Million fund established by the MOU—\$2 million from auto manufacturers and \$2 million from steel manufacturers. Effective August 1, 2008, the NVMSRP increased the payment for mercury switches removed from trunks and hoods from \$1 to \$4 and for anti-lock brake system assemblies (that contain mercury switches) from \$3 to \$6 each.

EPA considers this voluntary program a starting point for states that do not have more robust or mandatory

switch removal programs. The NVMSRP operates as an umbrella over most state mercury switch removal programs, both voluntary and mandatory, and numbers of switches collected by each state are reported annually. Maine's program operates outside the NVMSRP. The NVMSRP celebrated the collection of the one millionth mercury switch by more than 6,000 participants on February 29, 2008. See <http://epa.gov/mercury/switch.htm>.

Washington Recyclers Collect Mercury from Cars

Automobile recyclers in Washington have collected more than 45,000 light switches containing mercury, preventing the equivalent of 100 pounds of this toxic chemical from entering the environment. "The mercury switch collection program is an outstanding example of a win-win industry-and-government partnership," said Don Phelps, president of the Automotive Recyclers of Washington Association. "It has been a pleasure for the auto recycling industry to work with the Department of Ecology on this program." See

http://www.ecy.wa.gov/mercury/auto/index_auto.htm
1. Contact: Jan Brydsen, 509-575-2477.

EPA Region 7 Assistance on Stormwater Management Requirements

EPA's Region 7 is working to improve stormwater management awareness among auto salvage yards. Region 7: 1) identified auto salvage facilities in Iowa, Nebraska, Kansas and Missouri, 2) developed a comprehensive stormwater compliance check list and mailed to all 1,600 facilities, 3) visited ten facilities in Kansas City to provide on-site assistance, and 4) provided a detailed analysis of the conditions at these sites and steps to improve compliance.

This compliance assistance resulted in improved practices at facilities that applied for storm water permits and implemented the BMPs required by the permit. Twelve auto salvage facilities located in the Kansas City area applied for and got storm water permits after the mailing of the initial check list. Four of the ten facilities that were visited applied for a stormwater permit. Two of the facilities visited made improvements in the effectiveness of their BMPs. Contact: Raju Kakarlapudi, 913-551-7320, kakarlapudi.raj@epa.gov.

Tennessee Honors Auto Recycler

The Tennessee Department of Environment and Conservation selected Pull-A-Part, a used auto parts retailer in Tennessee, as the recipient of the 2007 Governor's Environmental Stewardship Award for Hazardous Waste Reduction for small businesses. The Governor's Environmental Stewardship Awards program recognizes exemplary voluntary actions that improve or protect the environment and natural resources.

Pull-A-Part removes, resells and recycles 1,000-2,000 cars each month, properly managing hazardous materials and eliminating the potential for automotive fluids to pollute waterways and ground water. Pull-A-Part reduced the amount of waste generated in the recycling process by 120 pounds for each net ton of cars, prevented 1.5 million pounds of waste from entering Tennessee landfills, recycles 1,000 tons of steel each month, and saves 3,380,000 KW hours of energy. The facility also recycles approximately 50,000 gallons of oil, gasoline, brake fluid, transmission fluid, refrigerant, antifreeze, and thousands of lead-acid batteries each year.

Trade Association Helps Promote Environmental Performance

The Automotive Recycling Association (ARA) has represented the business and environmental interests of the auto recycling industry since 1943. It services approximately 1,000 member companies through direct membership and over 2,000 other companies through its affiliated chapters as well as suppliers of equipment and services to this industry. ARA is dedicated to the efficient removal and reuse of automotive parts and the proper disposal of inoperable motor vehicles.



ARA encourages aggressive environmental management programs to assist member facilities in maintaining proper management techniques for fluid and solid waste materials generated from the disposal of motor vehicles. These include ARA's Certified Automotive Recycler (CAR) program, which certifies that participating automotive recycling facilities meet specified general business, environmental, safety, licensing, and regulatory standards. ARA's Gold

The Automotive Recycling Process consists of dismantling, crushing, shredding, and resource recovery.

Vehicle dismantling involves the following steps:

- 1) Fluid Draining: all fluids are drained from the vehicle including oil, antifreeze, coolant, brake fluid, transmission fluid, and washer fluid. Recyclable fluids include engine oil, coolant, refrigerant and gasoline.
- 2) Parts removal: easily removable parts of the vehicle, both interior and exterior are stripped. This includes removing all seats, dashboard, carpeting, and windows. Depending on their condition and market value, the parts are resold, recycled, or disposed in a landfill. Recyclable materials are typically batteries, catalytic converters, tires and plastics.
- 3) Powertrain Removal: removal of the engine, transmission, and axles. It is the final step before the vehicle is sent to the shredder.

The vehicle is then crushed and is loaded onto the vehicle shredder. Crushers should be operated on an impervious, fluid controlled surface to prevent contamination of soil, groundwater, and stormwater.

The vehicle, drained of all fluids and stripped of as many parts as possible, is compacted and then sent through a shredder. The shredder grinds the vehicle into fist-sized pieces, which are then separated into ferrous and non-ferrous (aluminum) metals, as well as auto shredder residue (ASR). Ferrous materials are metals such as steel and iron. Non-ferrous metals include aluminum, magnesium, copper, brass and zinc. After separation, the recovered metals are re-melted at the mills. The shredded ferrous material is sold to a steel mill where it is incorporated into new steel products. According to the American Iron and Steel Institute, in 2004 over 14.5 million tons of steel were recycled and reused for such things as new vehicle chassis and engines. Residues include some plastics, rubber, wood, paper, fabric, glass, sand, dirt, etc. ASR materials cannot be recycled; five million tons of ASR are disposed of in landfills each year.

Some operations are vertically integrated, meaning that more than one step takes place in one location. These facilities tend to have more environmental challenges because a wide range of activities take place on-site. Many automotive recycling facilities specialize in just one activity, such as dismantling.

Seal Program is available only to ARA members that have completed CAR certification. It seeks to promote excellence in customer satisfaction through improved customer service, quality parts with accurate descriptions, reliable on-time deliveries, and written product warranties.

The Vehicle Recycling Partnership (VRP) is working to increase recycling of each end of life vehicle to as close to 100 percent as possible. The partnership is under the umbrella of the United States Council for Automotive Research and participating members include the “big three” automakers, Argonne National Laboratory, the ARA, and the plastics division of the American Chemistry Council.

VRP achievements include:

- developing material selection and design guidelines to optimize vehicle recyclability;
- partnering with the domestic vehicle dismantling industry to improve the safety and efficiency of vehicle disassembly and materials recovery;
- increasing the amount of materials recovered during the vehicle recycling process; and
- partnering with public sector research institutions and private entities to continue to improve the materials reclamation process when leftover hulks are shredded.

Read about the VRP at

http://www.uscar.org/guest/article_view.php?articles_id=192.

Compliance Assistance Tools and Resources

Environmental Center for Automotive Recyclers (ECAR)



The Automotive Recycler’s Association has partnered with EPA to develop an on-line Environmental Compliance Center that promotes environmental compliance education, guidance and a cooperative use of resources throughout the automotive recycling industrial sector. It is a “one-stop shop” for environmental compliance information for all automotive dismantling and recycling operations.

The ECAR Tour, a hallmark of the Center, is a user-friendly, interactive tool that allows users to quickly access the environmental requirements that apply to more than 20 specific auto recycling issues for each individual state. Fact sheets are available on air bag cartridges, anti freeze, aqueous cleaning, lead-acid batteries, brake fluid, floor drains, gasoline and diesel fuel, hazardous wastes, mercury, used oil, oil filters, refrigerants (CFCs), septic tanks and disposal wells, shop towels, solvent cleaning, stormwater, Stormwater Pollution Prevention Plan (SWPPP), used and scrap tires, transmission fluid, vehicle crusher, wastewater, and window cleaner. Because the rules may vary from state to state, ECAR organizes

compliance information by state. It is easy to find just what you need to know for your operations. The information is presented clearly, in easy-to-understand language, and there are links to additional information.

Automotive recyclers use ECAR to find answers to questions such as:

- ▶ What will an environmental inspector look for at my facility?
- ▶ How can I better follow the rules so as not to jeopardize my business?
- ▶ Can I save money while making needed modifications?

Visitors to ECAR also will find:

- Updates on relevant regulatory developments
- Compliance tools and training
- A place to ask questions and get answers
- Databases on technologies and techniques
- Links to other assistance providers, vendors, and suppliers
- State Resource Locators for a wide range of topics to help find important state-specific environmental compliance information

Visit ECAR today at <http://www.ecarcenter.org/>.

ECAR is one of sixteen Compliance Assistance Centers supported by EPA. See them all at <http://www.assistancecenters.net>.

More Compliance Assistance Tools and Resources

EPA Region 1 Offers Help on the Web

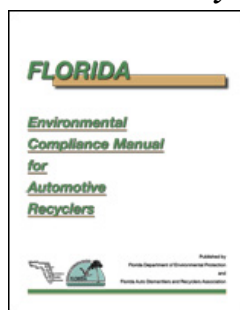
EPA Region 1 (New England) has created a website to provide compliance and best practices information for auto salvage yards. You will find contact information for Region 1 states, links to related web sites and publications, and industry success stories. <http://www.epa.gov/region1/assistance/salvageyard/index.html>. Contact: Carol Kilbride, kilbride.carol@epa.gov, 617-918-1831.

Regulatory Information and More from P2Rx



The Pollution Prevention Resource Exchange (P2Rx™) is a consortium of eight regional pollution prevention information centers, funded in part through grants from EPA. These centers all provide pollution prevention information, networking opportunities and other services to States, local governments and technical assistance providers in their region. The centers represent a broad constituency, including state and local pollution prevention programs, manufacturing extension partnerships, cooperative extension and nonprofit organizations. The P2Rx topic hub for auto recycling provides links to key Federal and many state regulatory requirements for auto recyclers, pollution prevention opportunities, key contacts, and more at <http://www.p2rx.org/topic hubs/toc.cfm?hub=506&sbsec=7&nav=7>.

Florida Environmental Compliance Manual for Automotive Recyclers



This guidebook and the associated *Compliance Self-Audit Checklist* were developed to help Auto Recyclers comply with environmental regulations. The *Manual* has detailed chapters on organizing your yard for preventing spills and other environmental problems, identifying and managing specific wastes, and NPDES stormwater permits, Stormwater Pollution Prevention Plans, and Best Management Practices to protect local waterways.

Find the *Manual* at

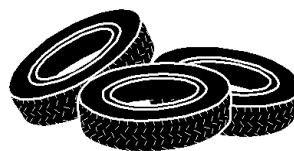
http://www.dep.state.fl.us/waste/quick_topics/publications/shw/hazardous/AutoR/AutomotiveHandbookupdateforweb.pdf and the *Checklist* at http://www.dep.state.fl.us/waste/quick_topics/publications/shw/hazardous/AutoR/AutoComplianceChecklist2forweb.pdf. The *Manual* is also available on the ECAR site at <http://www.ccar-greenlink.org/Salvageyard/AutomotiveHandbookforWeb.pdf>.

Environmental Compliance Guide for Ohio Motor Vehicle Salvage Yards

The Ohio EPA Small Business Assistance Office created this comprehensive guide in 2003 to help auto recyclers understand their environmental requirements and best practices. It has chapters on air pollution, Freon recovery, spill prevention, management of tires, fluids, filters, batteries, and hazardous waste, stormwater, floor drains, underground storage tanks, and mercury-containing switches. It contains a compliance screening checklist that covers major environmental requirements. For auto recyclers in Ohio, the guide also provides lists of contacts for different environmental programs and recycling various vehicle components. See

<http://www.epa.state.oh.us/ocapp/sb/publications/salvageguide.pdf>. The *Guide* is also available on ECAR at <http://www.ccar-greenlink.org/Salvageyard/SalvageYard.htm>.

Ohio Guide on Beneficial Use of Scrap Tires



Ohio EPA has produced a guide on the rules and statutes that apply to the use of whole or cut scrap tires in that State. Some uses are pre-approved, such as barriers at race tracks or in road construction. Other uses may require approval by the state or other approvals. There are requirements on transport, storage, and disposal. See http://www.epa.state.oh.us/dsiwm/document/guidance/gd_671.pdf.

Even More Compliance Assistance Tools and Resources

Revised NPDES Permit and Fact Sheets



To minimize the impact of stormwater pollution, EPA's National Pollutant Discharge Elimination System (NPDES) program includes an industrial stormwater permitting component—29 industrial sectors require a NPDES industrial

stormwater permit for stormwater discharges. (See <http://cfpub.epa.gov/npdes/stormwater/indust.cfm>.)



All but five states are authorized to implement the Stormwater NPDES permitting program, so most facilities obtain a NPDES permit through their state. (See <http://cfpub.epa.gov/npdes/stormwater/authorizations.tatus.cfm>.)

Where EPA is the permitting authority, coverage is available

under the Multi-Sector General Permit (MSGP). On September 29, 2008, EPA published its final 2008 MSGP. Facilities must file a notice of intent for a new permit by January 5, 2009. See <http://cfpub.epa.gov/npdes/stormwater/msgp.cfm>.

EPA's Office of Water has prepared a Fact Sheet on the NPDES program for auto recyclers to explain what you need to do to comply. See http://www.epa.gov/npdes/pubs/sector_m_autosalvage.pdf. The NPDES Fact Sheet for scrap facilities is available at http://www.epa.gov/npdes/pubs/sector_n_scraprecycling.pdf.

EPA Requirements on Refrigerants Recovered from Motor Vehicles

Motor vehicle disposal facility operators and certified automotive service technicians can, under certain conditions, recycle and resell refrigerants recovered from motor vehicles destined for disposal. Section 609 certified technicians who recover refrigerant (CFC-12 or a substitute) from motor vehicles at

disposal facilities can take the refrigerant off-site and recycle that refrigerant at their service facilities for reuse in other motor vehicles. In addition, owners or operators of motor vehicle disposal facilities are permitted to sell refrigerant recovered from such vehicles to section 609 certified technicians for re-use in motor vehicle air conditioners. Also, EPA allows facilities that rarely perform air conditioning service to contract with certified technicians from other service facilities to transport equipment to their location for refrigerant servicing rather than purchase equipment and ensure that their own technicians are trained and certified. Note that refrigerant recovered from home appliances must still be sent to a reclaimer. See

<http://www.epa.gov/Ozone/title6/609/subsumm.html>.

California Guidance Manual for Automotive Recyclers

The California Auto Dismantlers Association has developed a guidance manual to help auto salvage facilities know what to do to comply with regulations and protect the environment. *Partners in the Solution* explains business and licensing requirements and how



to comply with hazardous waste requirements, stormwater requirements, and more. You'll learn about how to properly manage vehicles, fluid, and battery storage, refrigerant removal, tires, solvents and degreasers, and other vehicle parts. Learn about spill kits, spill

reporting, stormwater filter systems, employee training, and what to expect during an inspection. You'll find information on safety standards, the *Partners* audit program, and contacts for more information. Find the guide on the ECAR Center at <http://www.ecarcenter.org/ca/SCADAmannual.pdf>.

Yet More Compliance Assistance Tools and Resources

EPA Region 7 Compliance Checklist

EPA Region 7 has developed a comprehensive compliance checklist for automotive salvage facilities. The 4-page checklist covers stormwater, storage tanks and oil pollution, waste management, air pollution control, and recordkeeping. Region 7 first identified auto salvage facilities located in the Region, then developed a comprehensive compliance check list and mailed it to all the identified 1600 auto salvage facilities. Later, the Region visited ten of these facilities in the Kansas City area to provide on-site assistance, a detailed analysis of the conditions at the site, and recommendations to improve



The EPA Region 7 comprehensive compliance checklist will help you identify and correct conditions at your facility so you can stay in compliance with requirements. (Photo by Catherine S. Tunis.)

compliance. Several facilities applied for permits and more improved their BMPs. Email for your copy of the checklist.

Contact: *Raju Kakarlapudi*, 913-551-7320, kakarlapudi.raju@epa.gov.

EPA Region 2 and New Jersey DEP Guidebook

EPA Region 2 and the New Jersey Department of Environmental Protection (NJ DEP) are developing a guidebook for auto recyclers that will provide an overview of best management practices for auto salvage yards, how to manage wastes, National Pollutant Discharge Elimination System (NPDES) stormwater permits, Stormwater Permit Pollution Prevention Plans (SPPP), air emissions, and more. The guide is expected out soon. Contact: *Steven Petrucelli*, petrucelli.steven@epa.gov, 212-637-4084.

Pollution Prevention Guide for Auto Recyclers

The Kansas Small Business Environmental Assistance program prepared this comprehensive guide that presents best practices for each aspect of auto recycling, vehicle components, and environmental requirements. The requirements are tailored for Kansas, but generally apply in other locations as well. See <http://www.sbeap.org/publications/salvageyardmanual.pdf>.

Free Spill Prevention, Control and Countermeasure Regulation Workshop

EPA Regions 5 and 7 plan to co-host a 4-hour workshop in January 2009 to provide information about the Spill Prevention, Control and Countermeasure (SPCC) regulation requirements for oil storage. If your facility has an aggregate above ground storage tank (AST) capacity greater than 1,320 gallons or a completely buried storage capacity greater than 42,000 gallons and there is a reasonable chance that a discharge of oil from your facility may enter surface waters of the U.S. or adjoining shorelines, you may be required to prepare and implement an SPCC Plan. This workshop will help you understand the requirements for the preparation, implementation and amendment of an SPCC Plan; required inspections, testing and recordkeeping; training and security requirements; secondary containment measures; applicability; transfer operation considerations; and current revisions and deadlines. The workshop will be broadcast via satellite to at least three locations per state in Region 5 (IL, IN, MI, MN, WI, OH) and on the Dish Network. The last hour of the broadcast is a Q & A session where participants can call a toll-free number and speak to the co-hosts live. Reservations are required so that the hosts can contact participants about the details on broadcast locations and Dish stations. Registration will begin online, by fax, or by mail sometime towards the end of November. The workshop will also be available for download from the registration website after the event for up to three months. Contact: *Dr. Barbara A. Carr*, 312-886-7187, carr.barbara@epa.gov.

Hot News

New EPA Rule for Steel Manufacturing Regarding Motor Vehicle Scrap Metal

EPA issued new air emissions standards that require steel manufacturers using electric arc furnaces to buy motor vehicle scrap from providers that participate in an EPA-approved program for the removal of mercury-containing switches. These switches were used for lighting in hoods and trunks and in some anti-lock braking systems of many vehicles manufactured prior to 2003. The standards are expected to reduce emissions of mercury and other toxic metals such as lead, manganese, nickel and chromium. See

http://www.epa.gov/ttn/oarpg/t3/fact_sheets/eaf_fs_121707.html. Note to motor vehicle recyclers: Many states also require removal of mercury switches. See links on page 4 of this newsletter or check with your state environmental agency.

Audience-Friendly Environmental Compliance Assistance Website for Colleges



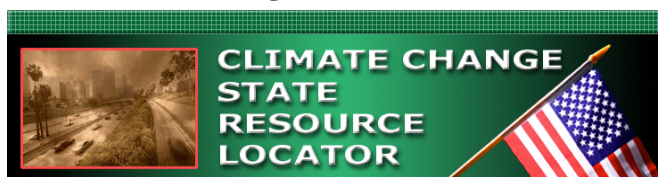
Campus Environmental Resource Center (Campus ERC), the new Compliance Assistance Center for colleges and universities, has been on-line since early April. Intended as the first stop for college and university officials looking for information about their environmental responsibilities and how best to meet them, CampusERC was developed by the National Association of Colleges and University Business Officials with support and funding from EPA. The Center makes it easier for school officials to learn more about applicable environmental regulations and ensure a safe and sustainable environment for their students, faculty and staff. CampusERC provides information on regulatory topics such as waste management, asbestos removal, and drinking water, as well as place-based environmental information, e.g., the environmental requirements associated with chemistry laboratories



or dining halls. Find out what types of campus activities are regulated by EPA, see how best to comply with environmental regulations, query federal enforcement and

compliance data, learn how to apply for federal grants, and e-mail comments to EPA on regulations under development. Visit the CampusERC at <http://www.campuserc.org>. EPA sponsors 15 other web-based Compliance Assistance Centers that are available at <http://www.assistancecenters.net>.

New Climate Change State Resource Locator



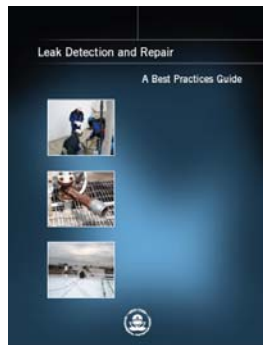
State and local governments play an important role in meeting the national goal of reducing greenhouse gas intensity by 18 percent by 2012. They are participating in national voluntary programs and initiatives, analyzing the costs and benefits of actions and developing and applying innovative programs and strategies that achieve wide-ranging benefits to businesses, the environment and public health. Use the Climate Change State Resource Locator to find state climate change resources. You will find links to state climate change main pages, state action plans, climate policies and more. We will be updating this tool as more resources become available. Visit: <http://www.envcap.org/statetools/climate/index.cfm>.

There are over twenty state-by-state resource locators for topics including stormwater, universal waste, asbestos, and many more located on the Compliance Assistance Center Platform. Each state resource locator offers easy access to state-specific regulations, guidance documents, permit forms (where applicable), and contacts. You can find links to all state resource locators at <http://www.envcap.org/statetools.htm>. *Contacts:* Paul Chalmer, paulc@ncms.org, 734-995-4911, or Tracy Back, back.tracy@epa.gov, 202-564-7076.

Hot News cont....

"Leak Detection and Repair: A Best Practices Guide" for Air Toxics (LDAR Guide)

The LDAR Guide is intended for use by regulated entities, compliance assistance providers and compliance inspectors to learn how to find and repair air toxics leaks and identify problems associated with LDAR programs focusing on Method 21 requirements. It also describes best practices to increase the effectiveness of an LDAR program. This document explains: 1) the importance of regulating equipment leaks; 2) the major elements of an LDAR program; 3) typical mistakes made when monitoring to detect leaks; 4) problems that occur from improper management of an LDAR program; and 5) best practices that can be used to implement an effective LDAR program. Most violations can be quickly and easily corrected without the need for new pollution control equipment. This document can also help build state capacity to detect noncompliance and provide compliance assistance. See www.epa.gov/compliance/resources/publications/assistance/ldarguide.pdf. *Contacts: Tom Ripp, 202-564-7003, or Joanne Berman, 202-564-7064.*



New NESHAP Requirement for Auto Body Shops

On January 9, 2008, EPA issued a new National Emission Standard for Hazardous Air pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. (See 73 FR 1738.) Facilities potentially affected are paint stripping operations using methylene chloride (MeCl)-containing paint strippers, motor vehicle and mobile equipment surface coating operations, and miscellaneous surface coating operations located at area sources. The NESHAP requires minimization of MeCl emissions, training/certification of painters, restrictions on methods of coating, spray booths, and notification, reporting, and record-keeping. New sources must comply immediately and existing sources must comply by January 9, 2011. For more

information, see <http://www.epa.gov/ttn/atw/area/arearules.html>, <http://www.paintcenter.org/ean.ppt>, and the Collision Repair Campaign at <http://www.epa.gov/air/toxicair/community/collision.html>. Find the complete rule at <http://www.epa.gov/fedrgstr/EPA-AIR/2008/January/Day-09/a24718.pdf>.

How to Find Financing for Environmental Compliance

EPA's Office of Compliance has created the Financing for Environmental Compliance website to provide a step-by-step financial planning process that can help communities determine capital asset technical and financial needs and find specific air, waste, and water resources. The website contains EPA and non-EPA media-specific financial and technical resources. It also provides specific resources for small communities and tribes seeking to fund major capital infrastructure projects. See



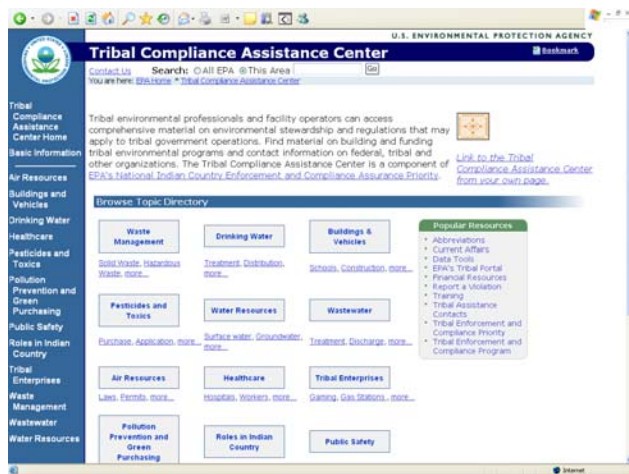
<http://www.epa.gov/compliance/assistance/financing/index.html>. *Contact: Cassandra Rice, 202-564-4057, rice.cassandra@epa.gov.*

New EPA Websites on Mercury-Containing Light Bulbs

EPA has established new websites to increase awareness, provide resource tools and information, and to encourage the proper recycling of all mercury-containing light bulbs (also known as lamps), including fluorescent light bulbs and compact fluorescent light bulbs. Homeowners are encouraged to recycle these bulbs through household hazardous waste programs to keep mercury out of the environment. Many businesses and other facilities are required to properly manage and recycle mercury-containing light bulbs. Learn how to clean-up broken bulbs, properly recycle/dispose of used mercury-containing light bulbs, obtain information about state and federal regulations, view frequently asked questions, and find step-by-step procedures on how businesses can establish a collection program. See <http://www.epa.gov/epaoswer/hazwaste/id/univwast/lamps/recycle.htm>.

EPA's Tribal Compliance Assistance Center (Tribal Center)

EPA's Office of Enforcement and Compliance Assurance's web-based Tribal Compliance Assistance Center provides comprehensive compliance assistance and pollution prevention information for regulated activities in Indian country. The Center is designed to help environmental professionals in tribal governments, others who work with tribes, and facility operators understand environmental requirements and other considerations for responsible environmental management in Indian country.



Center content is accessed through 12 topic area buttons. Each topic contains links to the most-up-to-date compliance and technical assistance information available from EPA. The Center links to EPA's Report an Environmental Violation Webpage, information about environmental activities that may affect air, water, and land in Indian country, compliance and enforcement information for approximately 800,000 EPA-regulated facilities, and comprehensive material on how and when to apply for federal grants. The Center provides instant links to EPA, tribal, and other federal agency environmental contacts who can answer questions about environmental compliance issues at both the national and regional level and media-specific level. See <http://www.epa.gov/tribalcompliance>. *Contacts: Jonathan Binder, 202-564-2516, binder.jonathan@epa.gov, or Catherine Tunis, 202-564-0476, tunis.catherine@epa.gov.*

The COMPASS

2009 National Environmental Partnership Summit, May 4-7, 2009

San Francisco will be the setting for this highly interactive and collaborative annual event that attracts about 700 attendees from industry, federal, state and local governments, nonprofit and trade associations. The Office of Compliance is one of the primary U.S. EPA sponsors, along with the Office of Policy, Economics, and Innovation's Office of Cross-Media Programs and the Performance Track Program, and the Office of Small Business Programs; nonprofit primary sponsors: National Pollution Prevention Roundtable and the Performance Track Participants Association. This year's theme is "Harnessing the Power of Collaboration." See <http://www.environmentalsummit.org>. *Contact Beverly Updike, 202-564-7142, updike.beverly@epa.gov.*



Toxic fluids leaking from this crusher are a violation of the Clean Water Act. (EPA Region 9 photo.)

A Good Idea in a New Shape

Replacing incandescent light bulbs with compact fluorescent lights can save 75% of the electricity. (Be sure to dispose of properly—these contain mercury! Call the RCRA hotline for requirements 1-800-424-9346 or see <http://www.epa.gov/epawaste/hazard/wastetypes/universal/lamps/index.htm>.) Light emitting diode (LED) exit signs use 87% less electricity than incandescent exit signs.



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- 2) Look for "ocorelink Office of Enforcement and Compliance Assurance information,"
- 3) Click on "subscribe," and
- 4) Enter your information.

COMPLIANCE HELP

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<http://www.assistancecenters.net>.