

Management and Records Contents

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Management and Records

Managing an auto body shop includes managing the health and safety of your employees and your neighborhood. This section offers tips to stay safe and within the law.

Careful records show good housekeeping. If your records are unavailable or out of date, then you are not in compliance.

Emergency Planning

Different emergency procedures are required depending on your generator status. (See *Generator Status and Reporting* on page 11 for more information on determining your generator status.)

Small quantity generator requirements

Small quantity generators are not required to follow these guidelines, but it is wise to prepare for emergencies. At a minimum, Ecology recommends:

- Post the current name and telephone number of the emergency coordinator.
- Post the location of fire extinguishers, spill control materials, and fire alarm.
- Post the telephone number of the fire department, unless the facility has a direct alarm.

Medium and large quantity generator requirements

Auto body shops that generate 220 pounds of dangerous waste or more (medium and large quantity generators) are required to follow Emergency Planning Procedures. More information on this requirement is available at www.ecy.wa.gov/biblio/9112n.html.

Emergency planning procedures

Medium and large quantity generators must educate employees on the proper waste handling and emergency procedures that are relevant to their job responsibilities. They must also appoint an emergency coordinator. There must be at least one employee on the premises or on call who is responsible for coordinating emergency response measures. It is also a good idea to have at least one back-up emergency coordinator.

Medium and large quantity generators must also post an emergency directory near all phones and intercoms.

The directory must contain:

- The name and telephone number (office and home) of the emergency coordinator and his or her backup(s).
- A description and location of emergency equipment, such as fire extinguishers, spill control materials, and alarm systems.
- The telephone number of the fire department, unless the shop has a direct alarm.

Emergency coordinators should be familiar with the:

- Operations and activities on-site.
- Location and hazardous properties of all the wastes handled.
- Location of all records.
- Layout of the facility (inside and outside).
- Emergency agreements made with state or local authorities.
- Outside emergency response contractors.

Large quantity generators must also prepare a Written Contingency Plan.

Spill Prevention and Reporting

Even small spills and drips can cause water pollution. In auto body shops, spills must be cleaned up immediately. Spills or discharges of any size that may pose a threat to human health or to the environment must be reported within one hour, then cleaned up and disposed of so that they do not pollute later.

Reporting spills

Generally, a spill should be reported when:

- Anyone, as a result of exposure, seeks or requires medical attention or examination.
- There is a potential for the material to enter water, including surface water (such as streams, lakes, rivers, and ponds), ground water, storm drains, or ditches.
- Illness, injury, stress, or death of fish, wildlife, or domestic animals occurs.
- There is a release to the air in sufficient quantity or concentration to harm people, animals, or plants.
- A spill occurs to soil that cannot be quickly controlled, contained, and cleaned up.

A spill inside of a building or secondary containment area must be reported if it escapes the confining area, such as through a doorway, crack, joint, or drain, or if it threatens human health or the environment.

Ecology regional spill reporting phone numbers

Northwest Regional Office in Bellevue:
(for Island, King, Kitsap, San Juan, Skagit, Snohomish & Whatcom counties)

(425) 649-7000
TDD: (425) 649-4259

Central Regional Office in Yakima
(for Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan & Yakima counties)

(509) 575-2490
TDD: (509) 454-7673

Southwest Regional Office in Olympia:
(for Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Lewis, Mason, Pacific, Pierce, Skamania, Thurston & Wahkiakum counties)

(360) 407-6300
TDD: (360) 407-6306

Eastern Regional Office in Spokane
(for Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla & Whitman counties)

(509) 329-3400
TDD: (509) 329-3569

For a template of a sign to post important numbers, see *Appendix F* on page 107.

Spill plans

The generator status (small, medium, or large quantity generator) determines whether a spill plan is required. Small quantity generators (SQGs) are not required to have a written plan, but it is always a good idea to plan for emergencies.

Medium and large quantity generators need to have a written response plan for a spill. This plan should include:

- A description of the facility, including the owner's name and address.
- The nature of the activity at the facility.
- The general types of chemicals used or stored at the facility.



- A site plan showing the location of storage areas for chemicals, the locations of storm drains, the areas draining to them, and the location and description of any devices to stop spills from leaving the site such as positive control valves.
- Cleanup procedures.
- Notification procedures to be used in the event of a spill, such as notifying key personnel and agencies such as Ecology, local fire department, Washington State Patrol, and the local sewer authority.
- The name of the designated person with overall spill cleanup and notification responsibility.

Prepare a summary of the plan and post it at appropriate points in the building, identifying spill-cleanup coordinators, location of clean-up kits, and phone numbers of regulatory agencies to be contacted in the event of a spill. Train key personnel in the implementation of the plan, and update the plan regularly.

Spill cleanup kits

If materials are used that could contaminate the environment, then spill-cleanup materials must be kept on-site. Spill kits should be stored in a manner that allows rapid access and use by employees.

The law does not specify what should be in a spill-cleanup kit. However, Ecology recommends using a drum or other container appropriate for the type and quantities of chemical liquids stored at the facility and marked with the words “Spill Kit.” If the container is made of an appropriate material, like high-density polyethylene, polypropylene, or polyethylene-sheet-lined steel, it can hold the kit items and be used to hold recovered wastes as well.

Inside the container, place:

- Polyethylene or equivalent disposal bags.
- Safety gloves/clothes/equipment.
- Shovels or other soil-removal equipment.
- Small bucket of loose absorbent material (floor sweep or kitty litter). Use a small plastic garbage bag to line the bottom of the bucket.



- Absorbent pads and oil containment booms, stored in an impervious container.
- Granular or powdered materials for neutralizing acid or alkaline liquids.

On the outside of the lid, print “Spill response directions on other side of lid.” Laminate and attach a 5” x 7” emergency card to the inside of the container lid. Suggested emergency card text is in the box below. Write in the Ecology Spills contact number from page 41.

Emergency Card

- Shut off the spill source and contain it, if possible and safe to do so. Do not allow any untrained or unprotected personnel to go into a spill area.
- Call 911 in the event of injury, fire, explosion, or other emergency. Give your name, the company’s name, the incident location, material(s) spilled, number/types of injuries, real/potential threats to life and property, and a return telephone number.
- Locate and inform senior or trained staff at your facility who can follow through on a spill. Take proper steps to correctly contain, cleanup, and/or properly dispose of wastes.

Department of Ecology
Spill-reporting Number _____

Fire Department _____

Local Sewer Authority _____

WA State Patrol _____

Other things to remember

- Place a spill-cleanup kit wherever there is a high potential for a spill, such as in fueling areas.
- Absorbent should be packaged in small bags for easy use and small drums should be available for storage of absorbent and/or used absorbent.
- Do not use emulsifiers for cleanup unless an appropriate disposal method for the resulting oily wastewater is implemented. **Absorbent material may not be washed down a floor drain or storm sewer.**

For more information or if you have questions on spill preparedness, prevention, and response please visit Ecology’s Spills Program on the Internet at www.ecy.wa.gov/programs/spills/spills.html.

Recordkeeping

This section of the manual covers areas of recordkeeping that may need clarification, including:

- Operation and Maintenance (O&M) manual.
- Inspection logs.
- Suggested maintenance schedules.
- Some plans and records required by the Department of Labor and Industries (L&I).

At the end of this section is a **Recordkeeping Checklist** of records and retention requirements.

Operation and Maintenance manual

An Operation and Maintenance (O & M) manual may include equipment manuals, maintenance schedules and logs, and monitoring records. Some local jurisdictions may also require specific items. See *Appendix A* on page 77 for local contact information. *Appendix D* on page 91 contains sample inspection logs and other resources.

Suggested items for an O&M manual:

- Maintenance logs, filter changes, repairs, pressure-drop readings for manometers (keep for a minimum of 2 years).
- Preventative maintenance schedules and records.
- Normal operating instructions for all emission units, such as spray booths and guns.
- Manuals and specification sheets for all emission units and other equipment (spray guns, spray booths, vacuum sanders, oil/water separators, compressors).
- A description of the monitoring procedures and schedule.
- What to do in case of abnormal control system operation.
- Names of employees trained to properly operate and maintain equipment.
- Other monitoring and recordkeeping that may be specified by an air permit.
- Maintenance records for catch basins and water treatment devices.

Suggested maintenance schedules

Logs from these inspections should be kept for a minimum of three years.

Daily:

- ✓ Check for unusual occurrences in process.
- ✓ Observe control panel indicators and gauges.
- ✓ Check compressed air pressure.
- ✓ Check filters.

Weekly:

- ✓ Inspect equipment and perform needed maintenance.
- ✓ Check compressed-air lines.

Monthly:

- ✓ Inspect fans for corrosion and material buildup.
- ✓ Inspect oil/water separators and other water treatment devices—clean out as necessary. Pay particular attention to maintenance of devices in high-use areas like vehicle wash bays.

Quarterly:

- ✓ Inspect paint and solvents for damaged or leaking containers.

Semi-annually:

- ✓ Clean out catch basins in fall and spring.

Annually:

- ✓ Check fan belts.
- ✓ Check all water treatment devices. Check manufacturer's instructions.

Inspection logs

Visual inspection reports of waste storage and water treatment devices should include:

- Scope of the inspection.
- Who conducted the inspection.
- The date(s) of the inspection.
- Major observations relating to the performance of devices.
- Actions taken to correct problems.

These reports should be kept for at least three years. *Appendix E*, on page 93 contains some sample inspection logs to use or modify for your needs.

Health and Safety

The Washington State Department of Labor and Industries (L&I) is responsible for employee safety and health regulations. Some of the laws that employers must follow are found at WAC 296-800 (Core Rules), 296-841 (Airborne Contaminants) and 296-842 (Respirators). The main requirements are described below.

A comprehensive description of the L&I rules can be found at www.lni.wa.gov/LawRule. Ecology urges you to read the guidance directly from the L&I Web site where the rules summarized below are presented in detail. The WACs listed can be easily found on the Internet. They are written in plain and clear English and are a valuable source of information.

Auto body shops may request free and confidential safety and health technical assistance from L&I's Division of Occupational Safety and Health (DOSH) Consultation Program. The DOSH Consultation Program is designed to help increase safety awareness, prevent accidents, and manage workers' compensation costs. Representatives can help you interpret and meet the safety and health rules outlined here.

Businesses cannot be fined in the course of a DOSH Consultation. However, any serious hazards must be corrected. Contact a consultant or learn more about the DOSH Safety & Health Consultation Program, at www.lni.wa.gov/Safety/Basics/Assistance/Consultation.

L&I has more information about health and safety issues in the collision-repair industry on their Web site at www.lni.wa.gov/Safety/Research/Collision/Default.asp.

Accident Prevention Program

The law requires businesses to have an Accident Prevention Program (APP). This is a written plan to prevent accidents, illnesses, and injuries on the job. Employers need to establish, supervise, and enforce an APP that works in practice. For examples of an APP go to www.lni.wa.gov/Safety/Basics/Programs/Accident.

Employers must:

- Develop a formal, written Accident Prevention Program that includes:
 - Safety orientation. Document the topics covered and dates of the orientation.
 - A safety and health committee. This is only required for shops with ten or more employees. Include names and contact information of committee members.
- Develop, supervise, implement and enforce safety-and-health training programs.
 - This includes on-the-job training for safe use of toxic materials, machine tools, and operation of utility systems.
 - Make sure the APP is effective in practice.

The APP law can be found at WAC 296-800-140.

Chemical Hazard Communication Plan

Shop owners are responsible for informing and training employees about the hazards of chemicals they may be exposed to during normal working conditions, or in foreseeable emergencies.

To comply with this responsibility, businesses are required by law to have an Employer Chemical Hazard Communication Plan. A Chemical Hazard Communication Plan includes worker training, material safety data sheets (MSDS), and container labeling.

Employers must:

- Develop, implement, maintain, and make available a written Chemical Hazard Communication Program.
- Include other employers in multi-employer workplaces.
- Identify and list all the hazardous chemicals present in the workplace.
- Maintain MSDSs for each hazardous chemical used.
- Make sure that MSDSs are readily accessible to the employees and inspectors.
- Properly label containers holding hazardous chemicals (See the *Dangerous Waste* section for more information on this requirement.)
- Inform and train employees about hazardous chemicals in the workplace they may be exposed to during normal working conditions or in foreseeable emergencies.
- Follow rules for handling chemicals in factory-sealed containers (as in WAC 296-800-170(40)). They include:
 - Make sure labels on incoming containers of hazardous chemicals are in place and readable.
 - Retain MSDSs.
 - Make MSDSs accessible to each work shift.
 - Inform and train employees how to protect themselves in case of a chemical spill or leak from a factory-sealed container.

These requirements are found in WAC 296-800-170.

Respiratory protection requirements

Shop owners are responsible for protecting their employees from exposure to respiratory hazards in the workplace by identifying and controlling the hazards.

Employers must:

- Identify and evaluate respiratory hazards.
- Control employee exposures.
- Use respirators when hazards have not been completely removed.
- Notify employees who are or may be exposed to respiratory hazards.

These requirements are found in WAC 296-841-200.



Respiratory Protection Program

Shop owners and employers are responsible for developing and implementing a written Respiratory Protection Program by using the procedures and the questionnaire provided in WAC 296-842-220. The program must provide clear instruction for safe and reliable respirator use.

Employers must:

- Use the medical questionnaire for medical evaluations.
- Follow the fit-testing procedures for tight-fitting respirators.
- Follow procedures established for cleaning and disinfecting respirators.
- Follow procedures established for seal-checking respirators.
- Keep respirator program records up-to-date.

L&I contacts

If you have questions about information in this manual or L&I regulations, contact:

Mark Soltow, Industrial Hygiene Consultation Supervisor
 Department of Labor & Industries - DOSH
 315 5th Avenue South Suite 200
 Seattle, WA 98104-2607
 (206) 515-2837 (voice)
 (206) 515-2830 (fax)
solt235@lni.wa.gov

For an **on-site technical consultation** with a DOSH (WISHA) specialist, contact your local regional L&I office. The most current numbers for the offices can be found at www.lni.wa.gov/Safety/Basics/Assistance/Consultation/consultants.asp

Region	Counties	Consultant	Phone Number	E-mail
1	Island, San Juan, Skagit, Snohomish, Whatcom	James Norris	(425) 290-1431	nork235@lni.wa.gov
2	King	Mark Soltow or Kelly Monahan	(206) 515-2837 or (206) 835-1146	solt235@lni.wa.gov or dres235@lni.wa.gov
3	Clallam, Jefferson, Kitsap, Pierce	Patrick Mahaney	(253) 596-3917	maha235@lni.wa.gov
4	Clark Cowlitz, Grays Harbor, Klickitat, Lewis, Mason, Pacific, Skamania, Thurston, Wahkiakum	Robert Cooley	(360) 902-5472	coor235@lni.wa.gov
5	Adams (west county), Benton, Chelan, Columbia, Douglas, Franklin, Grant, Kittitas, Okanogan, Walla Walla, Yakima	John McFadden	(509) 886-6570	mcfj235@lni.wa.gov
6	Adams (east county), Asotin, Ferry, Garfield, Lincoln, Pend Orielle, Spokane, Stevens, Whitman	Russell Poage	(509) 324-2543	poag235@lni.wa.gov

Table 5. Recordkeeping Checklist

	Type of Record	Who's Required	Retain	Location (fill in where it is located in your shop)
Department of Ecology				
E c o l o g y	Dangerous Waste Records			
	Dangerous Waste Reports	Businesses with a RCRA site ID #	5 yrs min.	"Turbo Waste" electronic filing is recommended.
	RCRA site ID form	MQGs, LQGs, some SQGs	5 yrs min.	"Turbo Waste" electronic filing is recommended.
	Proof of waste types, such as test reports (paint-booth-filter designation, etc.)	Everyone	5 yrs min.	
	Shipping papers	Everyone	5 yrs min.	
	Uniform hazardous waste manifests	MQGs, LQGs	5 yrs min.	
	Bills of lading or other shipping receipts	SQGs	5 yrs min.	
	Spill response plan	MQGs, LQGs	Ongoing	
	Training records on spill plans	MQGs, LQGs	One year	
	Emergency plan	MQGs, LQGs	Ongoing	
	Training records on emergency preparedness	MQGs, LQGs	One year	
	Dangerous waste accumulation area inspection logs	Everyone	One year	
	Solvent recycling (still) logs	Everyone with a still	One year	
Water Quality Records				
Water treatment device inspection and maintenance logs (oil/water separators, catch basin cleanout, etc.)	Everyone with a catch basin on-site	3 years		
Regional Air Agency				
A i r A g e n c i e s	Notice of Construction (NOC) permit	Everyone unless grandfathered	Forever	
	Spray-booth maintenance logs	May be required by NOC permit	5 yrs min.	
	Spray-booth pressure-gauge reading logs	May be required by NOC permit	Specified in NOC permit. Likely 5 yrs	
	O&M Manual	May be required by NOC permit	Active ongoing	
Environmental Protection Agency Area Source Rules				
E P A	Area source rule initial notification	Everyone by 1/11/2010	5 years	
	Area source rules notification of compliance	Everyone by 3/11/2011	5 years	
	Area source rule notification of changes reports	Everyone as changes occur	5 years	
	Area source rule deviation and corrective action documentation, if any		5 years	
	Spray-booth filter efficiency documentation		For life of filters	
	Spray-gun transfer efficiency documentation or HVLP spec sheet		For life of equipment	
	Training records for painters		5 years	
	Methylene-chloride reduction plan		Active/ongoing if required	
	MeCl usage records		5 years	
Environmental Protection Agency Area Source Rules				
L & I	MSDS sheets (including MeCl for EPA)	Everyone	Ongoing (30+ yrs)	
	Accident Prevention Program (APP)	Everyone	Active/Ongoing	
	Chemical Hazard Communication Plan	Everyone	Active/Ongoing	
	Respiratory Protection Program	Everyone	Active/Ongoing	

Top pollution Prevention Tips for Management and Records

Below are the top prevention tips for ways to better reduce or eliminate pollution from your processes. If the EnviroStars program is available in your jurisdiction and you would like to participate, these may be helpful ideas to use for your improvement goals. (See the *EnviroStars* section on page 73 for more information.)

- Inspect parts before coating, possibly eliminating coating rejected parts.
- Maintain records of all activities related to controlling or generating pollutants, such as training, materials purchased, materials use and disposal, and maintenance performed.
- Set up an inventory system in the shop to prevent products from going out of date and to prevent theft.
- Work with vendors and jobbers to get less toxic products.** If they don't carry them, ask! Create the demand.
 - Contact suppliers to find out if they supply safer coatings.
 - Contact suppliers to find out if they supply less-volatile gun-cleaning solvent or paint thinner.
 - Surf the Internet for information on alternative coatings.
 - Calculate the theoretical cost savings of switching to an alternative coating Include the true cost, including capital costs, operating costs, and the cost of the coating (on a solids basis) per part, must be calculated.
- Conserve energy.** Less energy generated equals less air pollution generated and money saved on utility bills. Try these ideas:
 - Replace old compressors.
 - Switch to fluorescent lights.
 - Purchase Energy-Star-rated appliances.
 - Install energy-efficient windows.
 - Activate energy-saving features on equipment.
 - Request an energy audit from your local utility or an EnviroStars partner.
 - Adjust heating and cooling habits and use modern systems.
 - Install skylights.
 - Tune-up the building (for example, calibrate thermostats, upgrade lighting).
 - Insulate the roof and windows.
 - Upgrade fan system.
- Implement and educate employees on basic conservation practices. Participation makes a plan work.

- ❑ Reduce emissions from transportation associated with the business (employee commuting, business travel, delivery of goods and services). Reducing miles traveled is one of the most important actions we can take to protect air quality. Emissions from vehicles represent the largest source of air pollution in our region.
- ❑ Develop idle-free policies. Idling gives zero miles per gallon with decreased air quality.
- ❑ Develop “No Idle Zones.”
- ❑ Post “No-Idle Zone” signs near loading bays and other locations at the worksite where idling commonly occurs.
- ❑ Implement a no-idle policy for fleet vehicles.
- ❑ Encourage employees not to idle in their personal vehicles.
- ❑ Initiate a Commute Trip Reduction Program — encourage employees to drive less by walking, biking, sharing a ride, riding the bus, or adopting alternative work hours.