Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, MN 55155-4194

Audit Checklist – Universal Wastes

Vehicle Maintenance Providers
Environmental Audit Checklist

Environmental audit checklists are designed to assist businesses by providing a low cost way of reviewing compliance with Minnesota's environmental laws and rules. Because the laws and rules are numerous and often complicated, this checklist cannot be a complete guide to your legal obligations. You may have obligations that are not covered on this checklist. If you have questions regarding the Environmental Audit Program or this checklist, please call the Small Business Environmental Assistance Program (SBEAP) at 651-282-6143 or 800-657-3938.

Date of Audit _____
Company _____
Completed by/Title _____

Environmental Audit Program Participation

A check mark in any of the boxes indicating that a requirement is not being met designates a violation of one or more regulations. To participate in the Environmental Audit Program, submit a report of your findings to the Minnesota Pollution Control Agency (MPCA). The Report Inventory form lists items that need to be included in the report and meets the audit report requirements. You do not need to submit a copy of this checklist.

Answer each question unless specifically directed otherwise.

Automotive mechanical and collision repair shops commonly generate some Universal Wastes. These Universal Wastes are:

- **Lamps** - such as fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide lamps (bulbs)
- **Batteries** - both dry cell and lead-acid

(Auto salvage yards commonly accumulate mercury-containing equipment [switches] that are also Universal Wastes.)

Call SBEAP for a copy of fact sheet #4.62, *Managing Universal Wastes*, or find it at http://www.pca.state.mn.us/publications/w-hw4-62.pdf.

1. Do you accumulate less than 5,000 kilograms (11,000 pounds) of universal waste on-site at any one time?

☐ Yes You are a small quantity handler.

- You must receive prior consent from the destination facility before the waste can be sent offsite.
- If the Universal Waste is a United States Department of Transportation (USDOT) hazardous material, it is subject to USDOT requirements for shipping papers, including retention requirements.
- You must train employees in proper waste handling and emergency procedures.

☐ No You are a large quantity handler.

- You must have a Waste (Environmental Protect Agency) ID number.
- You must receive prior consent from the destination facility before the waste can be sent offsite.
- If the Universal Waste is a USDOT hazardous material, it is subject to USDOT requirements for shipping papers, including retention requirements.
- You must ensure employees know proper handling and emergency procedures; gear training to employee responsibilities.
- You must track universal waste shipments received and/or sent off-site. You must keep records for three years.

☐ N/A You do not accumulate universal waste.

Managing Lamps

2. Do you:

- Manage lamps to prevent releases?
- Avoid breakage to prevent mercury vapor from escaping?
- Place unbroken lamps in a structurally sound, closed, and non leaking container that is adequate to prevent breakage and is compatible with the contents of the lamps?
- Place broken lamps in a similar container, but one separate from the unbroken lamps?
- Mark each lamp, each container or package of lamps with any of the below phrases:
    - *Waste lamp(s)*
    - *Used lamp(s)*

☐ Yes You meet these requirements.

☐ No You are not meeting these requirements.

3. If you accumulate more than a 1,000 lamps, do you have the finances to cover the cost of hiring a third party to properly dispose of discarded lamps?

☐ Yes You meet this requirement.

☐ No You are not meeting this requirement.

If you have questions about fluorescent lamp ballasts, call SBEAP for a copy of fact sheet #4.48f*, Managing PCBs in Ballasts and Small Capacitors*, or find it at http://www.pca.state.mn.us/publications/w-hw4-48f.pdf.

Managing Batteries

The following batteries are hazardous and must be managed as Universal Waste or as Hazardous Waste:

- Nickel-cadmium (Ni-Cd)
- Lead-acid - both sealed and unsealed
- Mercuric oxide
- Silver oxide
- Lithium - more than 9 volts.

These batteries, while generally non-hazardous, can still be recycled.

- Alkaline
- Carbon-zinc
- Nickel metal hydride (NiMH)
- Lithium ion - rechargeable
- Lithium - 9 volts or less
- Zinc air

For more information, call SBEAP for fact sheet #4.05, *Managing Dry-cell Batteries*, or find it at http://www.pca.state.mn.us/publications/w-hw4-05.pdf.

4. Do you :

- Manage hazardous batteries to prevent releases? (Batteries must remain intact. However, batteries with inadvertent damage that does not breach the cell casing can still be managed as a Universal Waste.)
- Place batteries that show evidence of leakage, spillage or damage that could cause leakage in a structurally sound, closed, and non-leaking container that is compatible with the contents of the battery and capable of enclosing potential releases?
- Mark each battery or each container with any of the below phrases:
    - *Waste batteries*
    - *Used batteries*

☐ Yes You meet these requirements.

☐ No You are not meeting these requirements.

Hint: *For new automotive batteries on display, make sure the rack is secure and loaded properly; and is not a tripping hazard, in the way, or unstable. New batteries become old batteries, and a waste problem if cracked or damaged. Acid from automotive batteries can burn skin and eyes. Have water available for flushing burns. Remember, these batteries are heavy, awkward to handle, and contain a strong acid, so use care in the shop as well.*

Contacts

MPCA Web site http://www.pca.state.mn.us

Small Business Environmental Assistance Program 651-282-6143
http://www.pca.state.mn.us/programs/sbap_p.html 800-657-3938

Minnesota Technical Assistance Program (MnTAP) 612-624-1300
http://www.mntap.umn.edu 800-247-0015

Metropolitan Counties Hazardous Waste Staff

Anoka County 763-422-7093
http://www.co.anoka.mn.us

Carver County 952-361-1800
http://www.co.carver.mn.us

Dakota County 952-891-7557
http://www.co.dakota.mn.us

Hennepin County 612-348-3777
http://www.hennepin.us

Ramsey County 651-266-2400
http://www.co.ramsey.mn.us

Scott County 952-496-8475
http://www.co.scott.mn.us

Washington County 651-430-6655
http://www.co.washington.mn.us