



Free Technical Assistance – No Cost to Shops!

Designngreen



Rebecca Stack

Janaye Dorsey Riley



Technical Assistance



Get the Word Out



Understanding Your Operations



Create Your Pollution Prevention Plan



Discuss: P2 Plan + Certification + Products



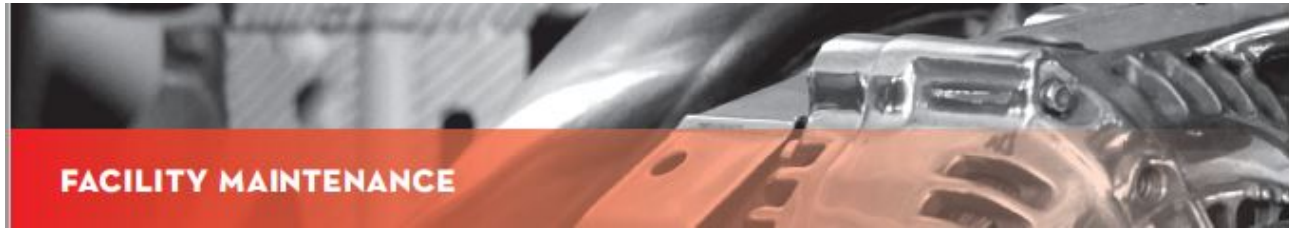
Goals + Actions + Application + Product Experience



ENVIRONMENTAL COMPLIANCE



VEHICLE MAINTENANCE



FACILITY MAINTENANCE

Baseline Surveys

- Meet with Owner or Shop Managers
- Review Operations
- Locate Permits and Plans
- Products: Brands, Usage, Needs
- Waste Management: Hazard + Universal
- Spill Prevention
- Storm Drain Protection
- Energy Demands + Greener Options

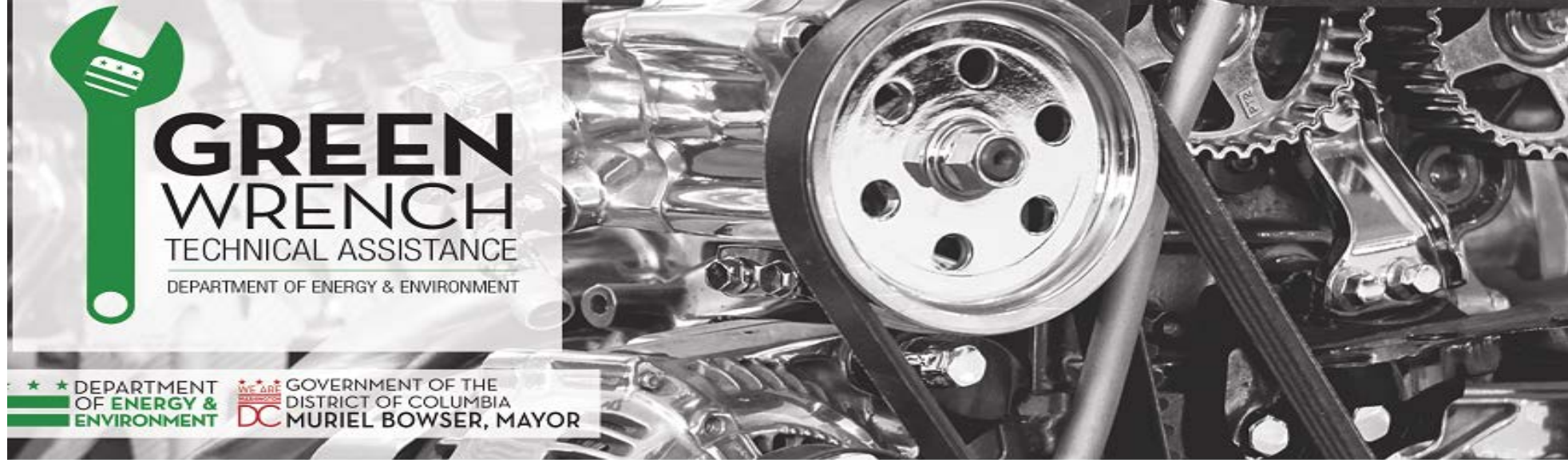
GREEN WRENCH
TECHNICAL ASSISTANCE
DEPARTMENT OF ENERGY & ENVIRONMENT

Business Name: [REDACTED]
Address: 231 [REDACTED]
Email: [REDACTED]

This questionnaire allows GreenWrench to identify how it can best help your shop reduce pollution and save money. Fill out the form to the best of your knowledge, using estimation when needed.

Plans and Permits	Operations																																											
Does your shop have environmental plans? Check all that apply: <ul style="list-style-type: none"> <input type="checkbox"/> None <input checked="" type="checkbox"/> SPCC Plan (Spill Prevention, Control, and Countermeasure Plan) <input type="checkbox"/> SWPPP (Stormwater Pollution Prevention Plan) or Stormwater Management Plan <input type="checkbox"/> HMMP (Hazardous Material Management Plan) or HMIS (Hazardous Materials Inventory Statement) <input type="checkbox"/> Other: <i>No oil water separator</i> 	What type of activities take place onsite? Check Yes or No <table border="1"> <thead> <tr> <th></th> <th>YES</th> <th>NO</th> </tr> </thead> <tbody> <tr><td>1. Brake Repairs</td><td><input checked="" type="checkbox"/></td><td><input type="checkbox"/></td></tr> <tr><td>2. Transmission Repair</td><td><input checked="" type="checkbox"/></td><td><input type="checkbox"/></td></tr> <tr><td>3. Body Repair</td><td><input checked="" type="checkbox"/></td><td><input type="checkbox"/></td></tr> <tr><td>4. Routine Services</td><td><input checked="" type="checkbox"/></td><td><input type="checkbox"/></td></tr> <tr><td>5. Vehicle Refinishing</td><td><input type="checkbox"/></td><td><input checked="" type="checkbox"/></td></tr> <tr><td>6. Electrical (<i>some</i>)</td><td><input checked="" type="checkbox"/></td><td><input type="checkbox"/></td></tr> <tr><td>7. Engine Repair/ Replacement</td><td><input checked="" type="checkbox"/></td><td><input type="checkbox"/></td></tr> <tr><td>8. Fuel and Ignition System/Injector</td><td><input checked="" type="checkbox"/></td><td><input type="checkbox"/></td></tr> <tr><td>9. Tire Replacement/ Repair</td><td><input checked="" type="checkbox"/></td><td><input type="checkbox"/></td></tr> <tr><td>10. Car washing</td><td><input type="checkbox"/></td><td><input checked="" type="checkbox"/></td></tr> <tr><td>11. Painting Services</td><td><input type="checkbox"/></td><td><input checked="" type="checkbox"/></td></tr> <tr><td>12. AC Services</td><td><input checked="" type="checkbox"/></td><td><input type="checkbox"/></td></tr> <tr><td>13. Other:</td><td></td><td></td></tr> </tbody> </table>			YES	NO	1. Brake Repairs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2. Transmission Repair	<input checked="" type="checkbox"/>	<input type="checkbox"/>	3. Body Repair	<input checked="" type="checkbox"/>	<input type="checkbox"/>	4. Routine Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5. Vehicle Refinishing	<input type="checkbox"/>	<input checked="" type="checkbox"/>	6. Electrical (<i>some</i>)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	7. Engine Repair/ Replacement	<input checked="" type="checkbox"/>	<input type="checkbox"/>	8. Fuel and Ignition System/Injector	<input checked="" type="checkbox"/>	<input type="checkbox"/>	9. Tire Replacement/ Repair	<input checked="" type="checkbox"/>	<input type="checkbox"/>	10. Car washing	<input type="checkbox"/>	<input checked="" type="checkbox"/>	11. Painting Services	<input type="checkbox"/>	<input checked="" type="checkbox"/>	12. AC Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>	13. Other:		
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Does your shop have existing environmental permits? <ul style="list-style-type: none"> <input type="checkbox"/> District of Columbia Air Quality Permit (e.g. paint booth) <input type="checkbox"/> Multi-Sector General Permit (MSGP) <i>only MS</i> for industrial stormwater runoff <input type="checkbox"/> Other: Please list <i>long paint</i> 	Energy and Heat <p>What type of energy does your shop use? <input checked="" type="checkbox"/> Pepco <input type="checkbox"/> Solar <input type="checkbox"/> Energy Choice DC <input type="checkbox"/> Other:</p> <p>How much energy does your shop use? Provide monthly energy usage, which can be found in your last bill. <i>\$200 - 300 or more / month</i></p> <p>Describe how your shop heats its bay(s) <i>electric heater</i> <i>electric AC</i> <i>(0) Use AC</i></p>																																											
Materials Management Mark which the strategies your shop uses. <ul style="list-style-type: none"> <input type="checkbox"/> Maintain a hazardous material inventory <i>(vendors only)</i> <input checked="" type="checkbox"/> Use a "First-in First-out" system <input checked="" type="checkbox"/> Place liquid containers in secondary containment <input checked="" type="checkbox"/> Label containers to identify contents <input checked="" type="checkbox"/> Have spill kits/absorbent <input checked="" type="checkbox"/> Keep Material Safety Data Sheets (MSDS) <input checked="" type="checkbox"/> Keep Manifests/Receipts from waste or recycling pick ups 	Additional Management Strategies <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Regular Employee Trainings Briefly describe what is taught: <input type="checkbox"/> Self Inspections/Audit Briefly describe what is inspected: 																																											
	Frequency: <i>yearly</i> Frequency: _____																																											

CSS



★ DEPARTMENT OF ENERGY & ENVIRONMENT
★ WE ARE WASHINGTON DC GOVERNMENT OF THE DISTRICT OF COLUMBIA MURIEL BOWSER, MAYOR

Prepared For [REDACTED]
By: Designgreen LLC
On: 2/6/2020

Modification Log for Facility Managers and Operators:

Date	Description of Modification	Name of Person Making Modification

Your Pollution Prevention Plan

- Goals and Actions
- Savings Opportunities and Certification Pathway

Hazardous Waste

Conditionally-exempt small quantity generators:

Generate less than or equal to 100 kg (220 lbs.) of hazardous waste and do not generate more than 1 kg (2.2 lbs.) of acute hazardous wastes (defined in sections 261.31 or 261.33(e))⁷ in any calendar month.

Small quantity generators: Generate greater than 100 kg (220 lbs.) but less than 1,000 kg (2,200 lbs.) of hazardous waste and do not generate more than 1 kg (2.2 lbs.) of acute hazardous wastes in any calendar month.

Large quantity generators: Generate greater than or equal to 1,000 kg (2,200 lbs.) of hazardous waste or generate more than 1 kg (2.2 lbs.) of acute hazardous wastes in any calendar month.

Registration:

To register as a hazardous waste generator with DOEE, the facility must:

1. Complete Federal registration Form 8700-12 "RCRA Subtitle C Site Identification Form," to request an EPA Identification Number (EPA ID #),
2. Send the completed form and a check for the required fee (see below for applicable fees) to DOEE, and
3. Submit an Annual Self-Certification of Compliance form and registration fee every year.

To download forms and for more information on registering as a hazardous waste generator, navigate to <https://doee.dc.gov/service/register-hazardous-waste-generator>.⁶



- Registration as a hazardous waste generator
 - Required for shops with hazardous waste, universal waste, or used oil on site
 - Hazardous waste: Ignitable, corrosive, reactive, or toxic

Hazardous Waste Regulations

Table 1. Summary of District and Federal (RCRA Part C) Hazardous Waste Regulations

REGULATION SUMMARY	FINE FOR NON-COMPLIANCE	SOLUTION
Identify hazardous wastes (HW), universal waste (UW), and used oil	\$500 to \$2,000 per infraction	Identify all HW, UW, and used oil generated at the facility
Properly manage all HW, UW, and/or used oil	\$500 to \$2,000 per infraction	Properly handle, store, and dispose all HW, UW, and used oil generated at the facility
Properly dispose of all HW, UW, and/or used oil	Up to \$37,500 per day per violation plus clean up expenses. This is DOEE's daily maximum	Work with a licensed hauler to take the HW, UW, or used oil. See Appendix 1, Local Contacts, for how to vet haulers
Burning used oil for heat	\$2,500 fine for each day of the violation, imprisoned for no more than 1 year for violating District regulations, ⁸ in addition to RCRA Subpart C fines ⁹	Switch to other fuel sources or use a different type of heater, such as an electric heater

Waste Haulers

- Tire Haulers
 - Proco
 - Emanuel Tire
- Rag Cleaners
 - Unifirst
 - Cintas
- Hazardous Waste Haulers
 - Crystal Clean
 - Safety Clean
 - Patriot Environmental
 - Lorco



Goal: Prevent Air and Water Pollution

- Sources of Water Pollution

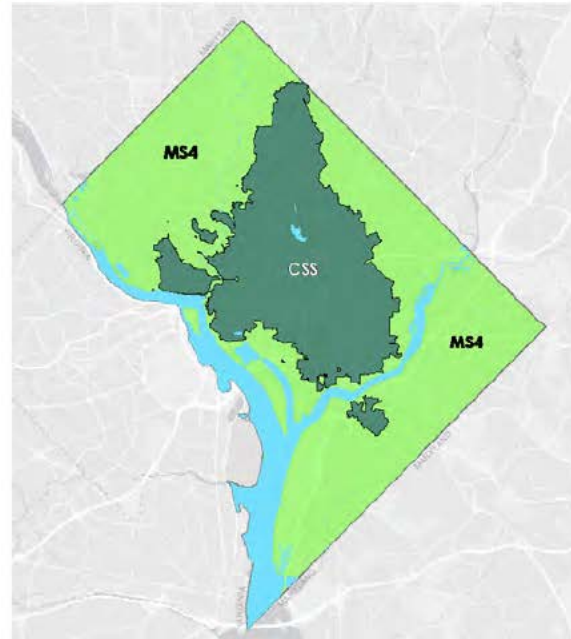
- Wash water
- Oils
- Antifreeze

No amounts of any of these substances may be disposed of or washed into a storm drain, and accidental releases must be prevented.

- Sources of Air Pollution

- Automotive painting and paint booths
- Parts washers that use toxic cleaners
- Vehicle idling (more than 3 minutes)

Map 1. Map of the MS4 and CSS areas of the District



KEY:

- Municipal Separate Storm Sewer System (MS4)
- Combined Sewer System (CSS)

Vehicle Maintenance

- **Used Oil and Antifreeze**
 - Store in barrels or storage tanks that are labeled and covered
 - Utilize secondary containment systems to minimize spills
- **Oil Filters**
 - Fully drain, then recycle with hauler
- **Brake Pads**
 - Install copper free brake pads
 - Assume all brake pads are made of asbestos
 - Low Pressure/Wet Cleaning Method



Vehicle Maintenance: Tires

- **Tires**
 - Extend the life of clients' tires
 - Use non-lead wheel weights

- **Best Practices**
 - Store as few tires as possible at the shop
 - Make sure tires are hauled away on a regular basis
 - Store tires on metal tire racks rather than on the ground
 - Store tires indoors or keep the tire pile covered to prevent rainwater from collecting (with a tarp)
 - Maintain access around the tire pile at all times



Soy-Based Tires by Goodyear





Vehicle Maintenance: Washing

- Wash water is harmful to the environment
- Untreated wash water is prohibited from entering storm drain
- If shop is in the MS4: Divert wash water to sanitary drain – requires DC Water discharge permit
- If shop is in the CSS: Obtain DC water discharge permit
- **Best practices**
 - Minimize the amount of wash water produced
 - Capture and Collect wash water to prevent it from entering storm drains
 - Treat wash water by diverting it to the sanitary sewer or a treatment facility
 - Use waterless car wash products

Vehicle Maintenance: Bodywork

- **Bodywork**
 - Contributes to air pollution and harms worker health
- **Best Practices**
 - Reduce worker exposure with Personal Protective Equipment (PPE)
 - Use mechanical paint stripping when possible. Use solvent paint strippers only when necessary
 - Use water-based paints (require fewer coats, non-flammable, and reduce VOCs)
 - Have proper ventilation
 - Collect and reuse, recycle, or safely dispose of leftover paint



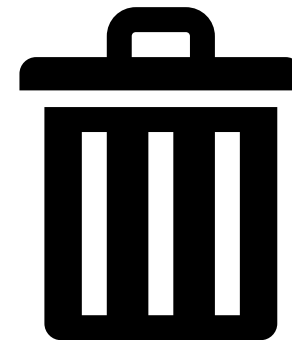
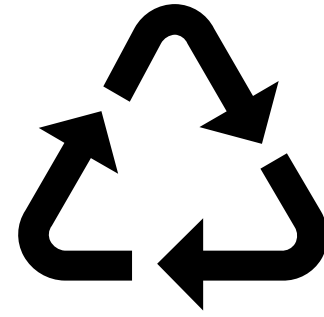
Facility Maintenance

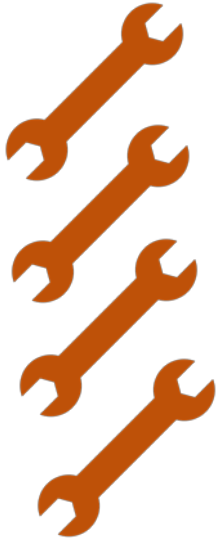
- Conserve energy to reduce environmental impact
- **Best Practices**
 - Apply light switch stickers
 - Keep overhead doors closed when possible
 - Use programmable or smart thermostats
 - In the summer, set the thermostat to 78 degrees when the shop is occupied, and 85 degrees or off after business hours
 - Using ceiling or room fans improves air circulation
 - Turn off office equipment or set it to “power down” when not in use.
 - Weatherize buildings



Facility Maintenance

- Minimize waste & manage properly to reduce environmental impact
- **Best Practices**
 - Dispose fluorescent lighting with a licensed universal waste handler
 - Incandescent and LED lamps may be placed in the trash
 - Use “first in, first out” method to minimize waste from expired materials
 - Keep accurate records of material usage so that reductions can be measured
 - Have a hauler for recycling (boxes, plastic containers, paper)
 - Have regular hauler pickups to minimize overflow





Environmental Compliance Checklist

In order to be eligible for GreenWrench Certification, the facility must be in compliance with environmental regulations.

Environmental Regulation	In Compliance	N/A	Comments
Hazardous and Universal Waste, Used Oil Regulations			
Air Quality Regulations			
Water and Land Regulations			

Qualifying & Additional Activities

Qualifying Activities: Shops will need to complete all three of the activities from this list.

Activity	Complete	Comments
Shop rags are commercially managed		
Adequate, clearly marked, spill containment kits are available and maintained in all areas where fluids are stored or handled		
Environmental compliance documents are maintained and are easily accessible		



YELLOW Activities (choose at least 2)	Complete	Comments
Recycled coolants are used (either recycled in-house or by vender)		
Copper-free brake pads used for brake pad changes		
Low pressure/wet cleaning methods are used when performing brake or clutch jobs		
No VOC degreasers are used		
Non-toxic lubricants and corrosion inhibitors are used		
Lead-free tire balancing weights are used		
Solar panels have been installed for energy efficiency		
Water efficient products are used where possible (Ex. low flow toilets)		
Total activities		



GREEN Activities (choose at least 4)	Complete	Comments
Re-refined motor oil is used for oil changes		
Anti-idling signage is installed at shop		
Stickers are applied near light switches to remind staff to turn off lights		
Automatic setback thermometers are installed to save on heating/cooling costs		
Energy efficient products are used where possible (ex. LED lightbulbs)		
Chemical paint stripper usage is minimal or eliminated through mechanical methods		
Storm drains are stenciled/marked to remind staff and customers that site drains to a local waterway		
Methods to reduce waste are used (Set your printers to default double sided, provide electronic invoices, provide durable dishware for staff, etc.)		
Total activities		



**GREEN
WRENCH**

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CERTIFIED



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designgreen_ecoengineers

Rebecca C. Stack

Principal

rcstack@designgreenllc.com