

Overview

Use this checklist to evaluate, improve, and document your compliance and implementation of best practices. Doing so will help you demonstrate your efforts to comply and improve the environmental, health and safety standards of your shop.

Basic federal, state, and local requirements are marked with a ✓ and are in **bold**.

This checklist is not a comprehensive list of all requirements, so by checking each box, it does NOT guarantee that you are in compliance with every possible requirement.

We suggest you print the checklist and date it. This will demonstrate to an inspector that you are actively engaged in ensuring compliance. It is a good idea to keep your printed checklists from the past three years to demonstrate ongoing compliance efforts.

An inspector will want to look at actual practice. We suggest that you view the checklist the same way – as an indicator of good faith, the proof of which is on the shop floor. If you are not in full compliance, you should document your efforts – including instructions and schedules – for remedying any problems. This guidance includes beyond compliance actions, because such actions demonstrate a good faith effort to reduce environmental, health and safety problems, make good business sense, protect workers and the environment, and are responsive to the preferences of many customers.

If you wish to print out a customized “Environmental Achievement” statement for customers to see, (at the end of the checklist), fill in the personalized information with some actions you would like to put on display, and then print it out to put up in your shop.

Date_____

Permits

See the “Permits and Inspection Readiness” fact sheet for more information about the following items.

1) ☐ **✓ We have an Occupancy Permit from the local Code Enforcement Agency.**

☐ *Action needed (describe below)*

2) ☐ **✓ We have all required permits from the local Fire Department. These will generally include a Flammable Storage Permit, Vehicle Storage Permit, and may include other permits as well.**

☐ *Action needed (describe below)*

3) ☐ **✓ We do not store vehicles outdoors at our shop for more than 30 days OR (if we do) we have a valid Use of Premises Permit from our local Code Enforcement Agency.**

☐ *Action needed (describe below)*

4) ☐ **✓ We are registered as an auto body repair business with the local City or Town hall.**

☐ *Action needed (describe below)*

5) ☐ **✓ We are registered as a Motor Vehicle Damage Repair Shop with the State Division of Standards (commonly known as “RS#”).**

☐ *Action needed (describe below)*

6)	<input type="checkbox"/> ✓ We have underground storage tanks and they are registered with the local FD and MassDEP.
	<input type="checkbox"/> <i>Action needed (describe below)</i>
<p><u>MassDEP Painting and EPA NESHAP 6H Rule</u></p> <p><i>Applicable to BODY SHOPS only. Skip this section if you do not do body and paint work. See the "Spray Painting Regulations" fact sheet for more information about how to comply with the items below.</i></p>	
7)	<input type="checkbox"/> ✓ At least one of the following is true (check any that are applicable) <ul style="list-style-type: none"> <input type="checkbox"/> We use less than 670 gallons per month of VOC-containing materials (emit less than 2.5 tons per month). <input type="checkbox"/> We use less than 2,000 gallons per 12-month rolling period of any organic material (including VOC and non-VOC). <input type="checkbox"/> We emit less than 10 tons of organic material for the same purpose. <input type="checkbox"/> We have a MassDEP Air Permit and comply with all of its requirements.
	<input type="checkbox"/> <i>Action needed (describe below)</i>
8)	<input type="checkbox"/> ✓ We apply all coatings with HVLP, electrostatic, airless or air-assisted airless spray guns, or an equivalent technology.
	<input type="checkbox"/> <i>Action needed (describe below)</i>

9)	<input type="checkbox"/> ✓ We perform all spray gun cleaning to prevent the creation of atomized mist of cleaning solvent by using a fully enclosed gun washer that re-circulates and collects used solvent.
	<input type="checkbox"/> <i>Action needed (describe below)</i>
10)	<input type="checkbox"/> ✓ We keep monthly purchase records of coating and surface preparation products for the last 12 months.
	<input type="checkbox"/> <i>Action needed (describe below)</i>
11)	<input type="checkbox"/> ✓ We work with our paint supplier to properly track and comply with Massachusetts and EPA limits for volatile organic compound (VOC) concentrations.
	<input type="checkbox"/> <i>Action needed (describe below)</i>
12)	<input type="checkbox"/> ✓ All of our spray booths are equipped with filters totaling at least two inches thick with at least 98% collection efficiency for paint overspray AND all of our spray booths exhaust through a vertical stack(s) that extend 10 feet above the roof line (see #60).
	<input type="checkbox"/> <i>Action needed (describe below)</i>
13)	<input type="checkbox"/> ✓ Our spray booths used for complete vehicles are fully enclosed, ventilated, and operate at negative pressure or up to 0.05 inches water gauge positive pressure. These booths have seals on all doors and other openings and an automatic pressure balancing system.
	<input type="checkbox"/> <i>Action needed (describe below)</i>
14)	<input type="checkbox"/> ✓ Our spray booths used for miscellaneous parts or subassemblies have a full roof, at least 3 complete walls or complete side curtains, and are ventilated to draw air into the booth.

☐ *Action needed (describe below)*

- 15) ☐ ✓ All of our painters have been trained and certified for the EPA NESHAP 6H rule within the past five years. This training educates surface coating operations technicians on spray gun equipment selection, spray techniques, maintenance, and environmental compliance.

☐ *Action needed (describe below)*

- 16) ☐ ✓ We have contact our paint manufacturer to request a list of paints that are regulated by US EPA's NESHAP 6H regulation. If you do use regulated coatings, you must notify the US EPA using this [form](#). If you do not use these products, you can file for an [exemption](#).

- 17) ☐ We use waterborne paints.

- 18) ☐ We use vacuum sanders or perform sanding in prep decks or other areas with local exhaust ventilation to capture sanding dusts.

Industrial Wastewater (IWW) Discharge

See the "Wastewater Regulations and Best Practices" fact sheet for more information about complying with the items below.

19)	<input type="checkbox"/> ✓ We do NOT discharge industrial wastewater into any of the following: <ol style="list-style-type: none"> 1. A septic system 2. A drinking water supply 3. Surface water (unless we have an NPDES permit) 4. Groundwater or ground surface (unless we have a groundwater discharge permit or an Underground Injection Control well registration from MassDEP) <p>If 19) is checked. We discharge water to (check one):</p> <ul style="list-style-type: none"> <input type="checkbox"/> Sewer (and we meet local requirements – usually requiring an oil/water separator) <input type="checkbox"/> Holding Tank (and we submitted compliance certification to MassDEP) <input type="checkbox"/> Surface Water (and we have an NPDES permit) <input type="checkbox"/> Groundwater or ground surface (and we have a MassDEP Groundwater Discharge Permit or UIC registration)
	<input type="checkbox"/> <i>Action needed (describe below)</i>
20)	<input type="checkbox"/> Our shop has an oil/water separator. This is required in some circumstances (e.g., to fulfill your NPDES or other permit requirements).
21)	<input type="checkbox"/> We educate our employees on the importance of avoiding surface water and groundwater pollution.
22)	<input type="checkbox"/> We do not wash vehicles on the premises. <p>OR, if we do, we do the following:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Before washing vehicles, we sweep the vehicle washing area. <input type="checkbox"/> We check vehicles for fluid leaks before washing them. <input type="checkbox"/> We contain and collect leaked fluids from underneath vehicles before washing them. <input type="checkbox"/> We use phosphate-free, biodegradable soaps and detergents for washing vehicles. <input type="checkbox"/> We use phosphate-based soaps for whitewalls and special uses only. <input type="checkbox"/> We minimize the amount of water used. <input type="checkbox"/> If we wash vehicles outdoors, we use berms to collect wastewater, and run the wastewater through an oil-water separator to remove oil and grit before discharging it. <input type="checkbox"/> If we wash vehicles outdoors, we wash vehicles away from ground that is not covered by concrete or other impermeable surfaces. <input type="checkbox"/> If we wash vehicles outdoors, we wash vehicles away from storm drains that do not flow into our oil-water separator.

Hazardous Waste Identification

See the "Hazardous Waste Management" and "Waste Oil Management" fact sheets for more information about how to comply with the items below.

23)

- ☐ **✓ We know our hazardous waste generator status (mark correct box below).**
- ☐ Very Small Quantity Generator (VSQG): generate between 0 and 26 gallons of hazardous waste per month and/or no acutely hazardous waste per month
 - ☐ Small Quantity Generator (SQG): generate between 27 and 270 gallons of hazardous waste per month and/ or less than 2.2 lbs of acutely hazardous waste per month.
 - ☐ Large Quantity Generator (LQG): generate more than 270 gallons of hazardous waste per month and/or 2.2 or more lbs of acutely hazardous waste per month.

☐ Action needed (describe below)

24)

- ☐ **✓ We know our waste oil generator status (mark correct box below).**
- ☐ [Very Small Quantity Generator](#) (VSQG): generate between 0 and 26 gallons of waste oil per month
 - ☐ [Small Quantity Generator](#) (SQG): generate between 27 and 270 gallons of waste oil per month.
 - ☐ Large Quantity Generator (LQG): generate more than 270 gallons of waste oil per month.

☐ Action needed (describe below)

25)

- ☐ **✓ We meet the maximum allowed storage/accumulation quantity according to our generator status, which are as follows:**
- ☐ Very Small Quantity Generator (VSQG): five drums at one time with no storage/accumulation time limit.
 - ☐ Small Quantity Generator (SQG): quantity limit of approximately thirty (30) drums [less than 13,230 pounds (lbs)] and time limit of 180 days.
 - ☐ Large Quantity Generator (LQG): no quantity limit and time limit of 90 days

☐ Action needed (describe below)

26) ☐ ✓ We have a permanent twelve-digit EPA generator identification (ID) number (can be alphanumeric) for the generation of hazardous waste.

☐ Action needed (describe below)

27) ☐ ✓ We have [notified MassDEP](#) of hazardous waste and/or waste oil activity.

☐ Action needed (describe below)

28) ☐ ✓ We are able to document that all wastes that are managed as non-hazardous are properly classified (e.g., if we handle booth filters as non-hazardous, they have been tested as such or we have other documentation to support this designation).

☐ Action needed (describe below)

Hazardous Waste Storage/Accumulation (S/A)

See the "Hazardous Waste Management" and "Waste Oil Management" fact sheets for more information about how to comply with the items below.

29) ☐ ✓ We have a designated hazardous waste S/A area.

☐ Action needed (describe below)

30) ☐ ✓ We store our non-hazardous waste materials and all other materials separately from hazardous waste.

☐ Action needed (describe below)

31)	<input type="checkbox"/> ✓ We clearly label our hazardous waste S/A area with a sign with letters that are at least one inch high that says "Hazardous Waste."
	<input type="checkbox"/> <i>Action needed (describe below)</i>
32)	<input type="checkbox"/> ✓ We clearly mark and distinguish the boundaries of the S/A area from other areas with, for instance, a yellow line or chain.
	<input type="checkbox"/> <i>Action needed (describe below)</i>
33)	<input type="checkbox"/> ✓ The floor of our hazardous waste S/A area is impervious to leaks, without any cracks, openings, or drains.
	<input type="checkbox"/> <i>Action needed (describe below)</i>
34)	<input type="checkbox"/> ✓ We do not have the S/A area outdoors, OR (if it is outdoors), there is adequate secondary containment that would collect spills of liquid materials.
	<input type="checkbox"/> <i>Action needed (describe below)</i>
35)	<input type="checkbox"/> ✓ We do not have the S/A area outdoors, OR (if it is outdoors), our outside hazardous waste S/A area is secured against trespassers.
	<input type="checkbox"/> <i>Action needed (describe below)</i>

- 36) ☐ We employ the following best practices to minimize our hazardous waste accumulation:
- ☐ We use an oil filter crusher and recycle our oil filters.
 - ☐ We recycle antifreeze.
 - ☐ We use adhesive or lead-free wheel weights and recycle all wheel weights that enter our shop.
 - ☐ We use aqueous brake cleaner.
 - ☐ We use aqueous parts cleaner.
 - ☐ We use an aqueous gun washer.
 - ☐ We have switched to less toxic cleaner for surface preparation.
 - ☐ We use a solvent recycler.

Hazardous Waste Container Management

- 37) ☐ **✓ We properly label all containers of hazardous and non-hazardous waste with the words "Hazardous Waste" or "Non-Hazardous Waste," the name of the waste, the type of hazard, if we are an SQG or LQG, and the date storage began.**

☐ *Action needed (describe below)*

- 38) ☐ **✓ We properly close all containers of hazardous waste to avoid spilling or evaporation into the air, and we do not leave our containers open to the air (except when filling).**

☐ *Action needed (describe below)*

- 39) ☐ **✓ All of our containers of hazardous waste are in good condition (not dented, rusted, cracked, or opened).**

☐ *Action needed (describe below)*

Hazardous Waste Documentation and Transport

See the "Hazardous Waste Management" fact sheet for more information about how to comply with the items below.

40)

- ☐ **✓ We are either:**
1. a VSQG and we do not self-transport hazardous waste (check box to left and skip boxes below),
 2. a SQG or LQG (check box to left and skip boxes below), or
 3. a VSQG, we self-transport hazardous waste, and we comply with all of the boxes below.
- ☐ **We maintain a list of the waste type, waste quantity, date of waste transport, and date of waste treatment or disposal.**
- ☐ **We document where our waste is taken to (any and all locations).**
- ☐ **We get and keep proofs of receipt from the facility that accepts our waste.**

☐ *Action needed (describe below)*

41)

- ☐ **✓ We either:**
1. only self-transport our hazardous waste (check box to left and skip boxes below) or
 2. have someone else transport our hazardous waste and comply with all of the boxes below.
- ☐ **We have hazardous waste manifests completely filled out and distributed.**
- ☐ **We keep our hazardous waste manifests for at least three years.**
- ☐ **We use licensed hazardous waste transporters.**

☐ *Action needed (describe below)*

42)

- ☐ **✓ We label our hazardous waste containers for transport with the words "Hazardous Waste," the name of the waste, the type of hazardous waste (such as reactive, corrosive, toxic, etc.), and our name, address, and generator ID number.**

☐ *Action needed (describe below)*

Aboveground and Underground Storage Tanks

43)

- ☐ **✓ We do not have an aboveground storage tank (AST) OR (if we do), we comply with all of the boxes below.**
- ☐ We have documents of our AST capacity.
 - ☐ We have documents of the date of the AST installation.
 - ☐ We know the type of waste stored in the AST.
 - ☐ Our AST and its containment meet the hazardous waste storage/accumulation requirements of items 29) to 39).

☐ *Action needed (describe below)*

44)

- ☐ **✓ We do not have an underground storage tank OR (if we do have one), all of the following are true (many of these are [based on a new January, 2015 rule](#)):**
- ☐ As of January, 2015, all new and replacement USTs and associated piping are double-walled, and we will ensure all single-walled steel tanks are removed by August 17, 2017.
 - ☐ If we have had a UST replaced (also check box if you haven't had one replaced) after January 2, 2015, we have UST system installations, including installers' certifications, manufacturers' specifications and checklists, records of all testing results and inspections conducted during installation, and it was inspected by the UST system designer or the designer's designee before the excavation is backfilled. We have also registered the new UST with MassDEP within 30 days of the UST system's receipt of regulated substance.
 - ☐ Our UST is inspected every three years by a Third Party Inspector and the Inspector's report is submitted to MassDEP.
 - ☐ We submit a compliance certification for our UST system every three years (18 months from the last TPI)
 - ☐ Our UST system has equipment in place for early detection of leaks and to prevent the release of regulated substances.
 - ☐ We have pressurized piping installed before May 28, 1999 and will ensure that an automatic line leak detector is installed by January 2, 2016. (Pressurized piping installed on or after 5/28/1999 is already required to have an ALLD installed.)
 - ☐ We have already or will ensure that a submersible sump is installed by January 1, 2019.
 - ☐ We have installed a 5-gallon spill bucket.
 - ☐ We can demonstrate financial assurance for the clean-up of releases (e.g. a current Certificate of Compliance from the MA Department of Revenue).

☐ *Action needed (describe below)*

OSHA Requirements and Best Practices

45) ☐ **✓ For every hazardous chemical or solution that we use, we have Safety Data Sheets (SDS) on file and readily accessible to employees.**

☐ *Action needed (describe below)*

46) ☐ **✓ We have a written Hazard Communication Program that meets basic OSHA requirements.**

☐ *Action needed (describe below)*

47) ☐ **✓ We have identified required Personal Protective Equipment (PPE) (safety glasses, gloves, respiratory protection) for shop activities and our employees consistently use the required PPE.**

☐ *Action needed (describe below)*

48) ☐ **✓ We have one or more eye wash station(s) that is properly tested and maintained.**

☐ *Action needed (describe below)*

49) ☐ **✓ If we paint, sand, or weld, we have a Respiratory Protection Program for respirator use (including medical screening and fit testing) that meets basic OSHA requirements (skip if not applicable).**

☐ *Action needed (describe below)*

50) ☐ **✓ We do not need a hearing protection program, or (if we do), the Hearing Protection Program meets basic OSHA requirements.**

☐ Action needed (describe below)

- 51) ☐ ✓ Personnel that work in areas with hazardous substances and waste, or flammable or combustible materials, have been trained (1) in emergency procedures and (2) in the safe handling, storage, transfer, and use of the materials (including how to use SDS information). We also keep records of the dates and training provided.

☐ Action needed (describe below)

- 52) ☐ ✓ We have fewer than 11 employees (check box to left and go to next question) OR (if we have 11 or more), we 1) keep records (OSHA 301 forms and 300 Log) of work-related injuries or illnesses, as required by OSHA, and 2) have an [OSHA 300-A Summary Form](#) of total injuries and illness for the calendar year posted annually during the period of February 1 through April 30.

☐ Action needed (describe below)

- 53) ☐ ✓ We have a Personal Protection Equipment (PPE) Program as required by OSHA that includes annual training and satisfies all OSHA requirements such as respirator fit testing and medical evaluations.

Spray Booth

*This section is only applicable to **AUTO BODY** shops. Skip this section if you do not do body and paint work.*

- 54) ☐ ✓ Our spray enclosure has a functioning mechanical exhaust system.

☐ Action needed (describe below)

55)	<input type="checkbox"/> ✓ Our spray enclosure is constructed of fire resistant materials (walls must have a minimum of a 1-hour fire resistance rating to be considered fire resistant) (per NFPA 33).
	<input type="checkbox"/> <i>Action needed (describe below)</i>
56)	<input type="checkbox"/> ✓ We have placed clearly-labeled and accessible fire extinguishers near the spray enclosure.
	<input type="checkbox"/> <i>Action needed (describe below)</i>
57)	<input type="checkbox"/> ✓ Our spray enclosure has sufficient ventilation to maintain an air transfer rate of 100 linear feet per minute across the enclosure (per OSHA 29 CFR 1910.107(b)(5)(i)), and the face velocity of air at the filter does not exceed 200 feet per minute (per 310 CMR 7.03(16)(f)).
	<input type="checkbox"/> <i>Action needed (describe below)</i>
58)	<input type="checkbox"/> ✓ We store no more than a one-day supply of flammable or combustible liquids in our spray painting enclosure and within the vicinity of spraying operations.
	<input type="checkbox"/> <i>Action needed (describe below)</i>
59)	<input type="checkbox"/> ✓ Our spray painting enclosure and surrounding areas are free of fire hazards and from hot surfaces (e.g., heating appliances, portable heat panels, steam pipes, or hot surfaces).
	<input type="checkbox"/> <i>Action needed (describe below)</i>

60)	<input type="checkbox"/> <input checked="" type="checkbox"/> Our spray enclosure exhaust stack is properly located (as required by NFPA Code 33, the open end of the stack must end at least 25 feet from any combustible walls or unprotected openings). The exhaust stack also vertically discharges, is 35 feet tall or 10 feet above roof level, does not have a rain protection device that restricts exhaust flow, and has a gas exit velocity of greater than 40 feet per second (per 310 CMR 7.03(16)).
	<input type="checkbox"/> Action needed (describe below)
61)	<input type="checkbox"/> <input checked="" type="checkbox"/> We are careful to avoid and address any complaints from neighbors about dust, odors, or other air pollution coming from your shop.
<h3>Storage of Flammable Chemicals</h3>	
62)	<input type="checkbox"/> <input checked="" type="checkbox"/> All of our solvents, coatings, and cleaning materials are stored in tightly-closed containers.
	<input type="checkbox"/> Action needed (describe below)
63)	<input type="checkbox"/> <input checked="" type="checkbox"/> We use a flammable storage cabinet or room to store our flammable liquids (required by OSHA for more than 25 gallons). Only flammable materials are kept in the flammable storage cabinet.
	<input type="checkbox"/> Action needed (describe below)
<h3>Mixing Room</h3> <p><i>This section is only applicable to AUTO BODY shops. Skip this section if you do not do body and paint work.</i></p>	
64)	<input type="checkbox"/> <input checked="" type="checkbox"/> When transferring flammable liquids from a drum to a small container for shop use, we ground and bond both containers to eliminate static sparks.

☐ Action needed (describe below)

65) ☐ ☒ **Our mixing rooms or area is ventilated at a rate of 1 cubic foot per meter per square foot of floor area.**

☐ Action needed (describe below)

66) ☐ ☒ **Local exhaust ventilation is provided where mixing is performed.**

Refrigerant and Antifreeze Recovery

See "Refrigerant Recycling Systems" fact sheet for more information about how to comply.

67) ☐ ☒ **We do not service (repair, alter, evacuate) motor vehicle air conditioning units at our shop (check box to left and go to next question), OR (if we do), we comply with the requirements in the boxes below.**

- ☐ **We have certified equipment and technicians.**
- ☐ **We comply with documentation requirements.**
- ☐ **We follow sale and purchase restrictions.**
- ☐ **We recover and recharge refrigerant with an in-shop unit or transfer it offsite to a certified entity.**

☐ Action needed (describe below)

Fire Prevention and Emergency Planning

68)	<input type="checkbox"/> ✓ Our automatic fire system/sprinkler system is operating properly, and sprinkler heads are kept unclogged (per OSHA 29 CFR 1910.107(b)(5)(iv)).
	<input type="checkbox"/> <i>Action needed (describe below)</i>
69)	<input type="checkbox"/> ✓ We provide and document emergency training to our employees (e.g., OSHA, Code of Federal Regulations (CFR) 1910.38 and 1910.157, items such as fire extinguisher training, emergency responsibilities, and emergency numbers).
	<input type="checkbox"/> <i>Action needed (describe below)</i>
70)	<input type="checkbox"/> ✓ We list emergency telephone numbers by the telephone.
	<input type="checkbox"/> <i>Action needed (describe below)</i>
71)	<input type="checkbox"/> ✓ We have a working fire extinguisher.
	<input type="checkbox"/> <i>Action needed (describe below)</i>
72)	<input type="checkbox"/> ✓ We have a spill control plan.
	<input type="checkbox"/> <i>Action needed (describe below)</i>
73)	<input type="checkbox"/> ✓ We post emergency information (locations of fire extinguishers, alarms, evacuation routes, and post-exit meeting places).
	<input type="checkbox"/> <i>Action needed (describe below)</i>