



Rhode Island Department of Environmental Management
Office of Technical and Customer Assistance



Environmental Compliance Certification Program
for
Auto Salvage Yard Facilities



Auto Salvage Yard Facilities Certification Program

*NEWMOA Assistance and Pollution Prevention
Web Conference*

May 29, 2008





Auto Salvage Yard Facilities Certification Program

Project Partners



U.S. Environmental Protection Agency



University of Rhode Island, Center for
Pollution Prevention & Environmental Health



Narragansett Bay Commission



Auto Salvage Yard Facilities Certification Program

Identifying the Auto Salvage Yard Facilities Universe

All auto salvage yard facilities in Rhode Island are required by regulation to be licensed, and are regulated by the Rhode Island Department of Business Regulation (RI DBR)

- ❑ RI DBR also investigates complaints from consumers, the insurance industry, and law enforcement
- ❑ RI DBR reviews new and renewal license applications to insure that licensees meet all licensing requirements



Auto Salvage Yard Facilities Certification Program

A Quick Profile of the RI Auto Salvage Yard Facilities Universe

- ❑ Currently, there are eighty-six (86) auto salvage yard licensees
- ❑ Sixty-six (66) licensees are now actively operating auto salvage yard facilities



Auto Salvage Yard Facilities Certification Program

What is the Auto Salvage Yard Facilities Certification Program?

Auto Salvage Yard Facility Operators can self-certify that they are complying with environmental regulatory requirements and best management practices that apply to their business

The program uses three components:

1. Certification Workbook
2. Self-Certification Checklist Package
3. Training



Auto Salvage Yard Facilities Certification Program

- o The program was designed and documents were drafted with contributions and input by staff from project partners
- o An industry stakeholder group met in early 2007 to review draft documents and give input on program design and the documents
- o The program was introduced to auto salvage yard facility operators in May 2007, with a Program Introduction workshop for auto salvage yard facility operators held in June 2007, after operators had received certification documents
- o Training workshops were held in January 2006 and June 2007, and future workshops will be held to address appropriate topics.
- o With a three year certification cycle, the next round of self-certification will take place in 2010



Auto Salvage Yard Facilities Certification Program

An additional resource, for auto salvage yard facility operators who participate in the program or wish to consider it, persons wishing to view the list of certified facilities, and the general public seeking information about auto salvage yard facility certification and related topics, is RIDEM's Auto Salvage Yard Facilities Certification Program webpage, found at:

<http://www.dem.ri.gov/programs/benviron/assist/asy/index.htm>





Auto Salvage Yard Facilities Certification Program

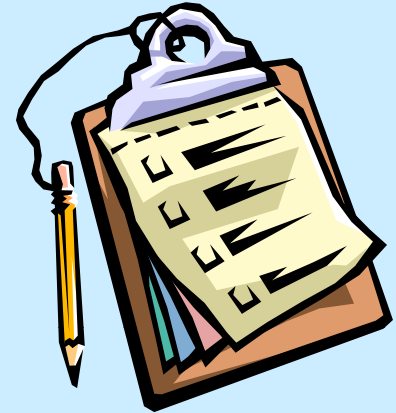
Benefits for operators who participate:

- Preparation for a random inspection of work being performed
- Reduced inspection priority
- Free technical assistance from RIDEM's Office of Technical & Customer Assistance and the University of Rhode Island Center for Pollution Prevention & Environmental Health to comply with environmental requirements and best management practices
- Information and education on methods of complying with environmental regulations that apply to auto salvage yard facilities
- Receiving a Certificate of Participation from RIDEM
- Being placed on a public list of certified auto salvage yard facilities on RIDEM's website
- Using the RIDEM Certification as a marketing tool with customers
- Receiving educational materials



Auto Salvage Yard Facilities Certification Program

- Participation in the program is voluntary
- All auto salvage yard operators are strongly encouraged to participate, by emphasizing:
 - The benefits of participating in the program, and
 - All auto salvage yard facilities operating in the State of Rhode Island *must* comply with all applicable environmental regulations, whether or not they self-certify





Auto Salvage Yard Facilities Certification Program

This is an Environmental Results Program

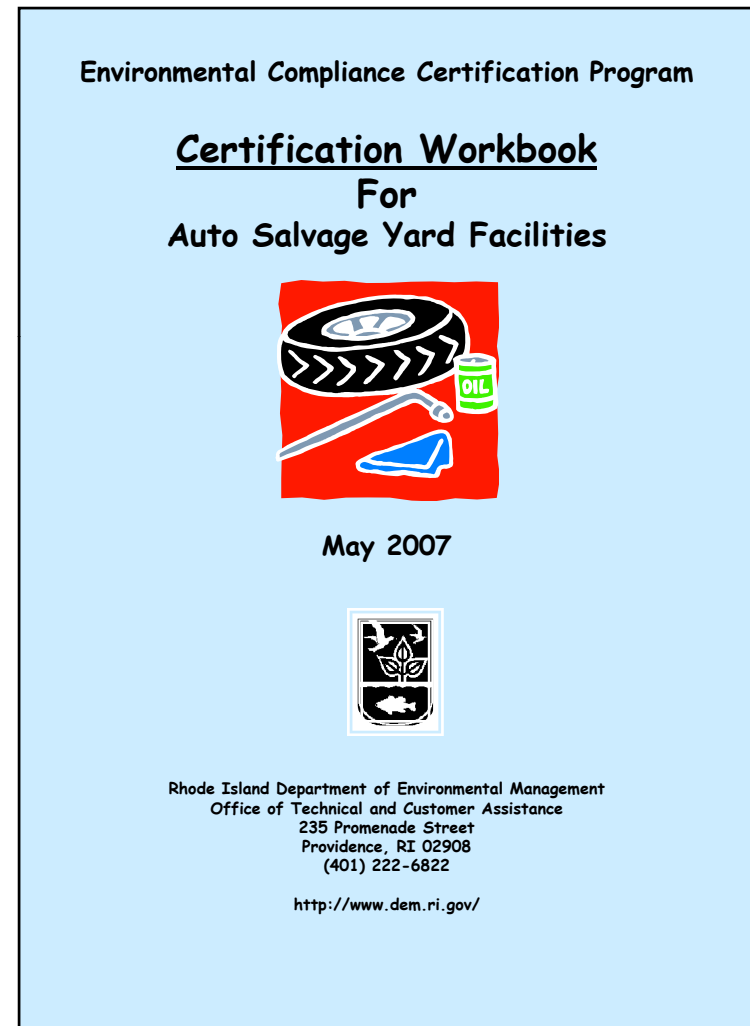
Three Major Components

- 1. Compliance Certification**
 - clear standards, accountability, self-evaluation
(Certification Workbook and Self-Certification Checklist Package)
- 2. Technical/Compliance Assistance**
 - (Provided by DEM Office of Technical & Customer Assistance and URI Center for Pollution Prevention & Environmental Health)
- 3. Performance Measurement**
 - statistically-based, inspections & enforcement



Auto Salvage Yard Facilities Certification Program Compliance Certification

- ❖ The **Certification Workbook** contains the basic materials needed to understand environmental regulations and best management work practices related to common auto salvage operations, and how to make sure that they are complied with.
- ❖ The workbook is designed to be used in conjunction with the **Certification Checklist Package**, and can also be used as a reference for auto salvage yard operations.



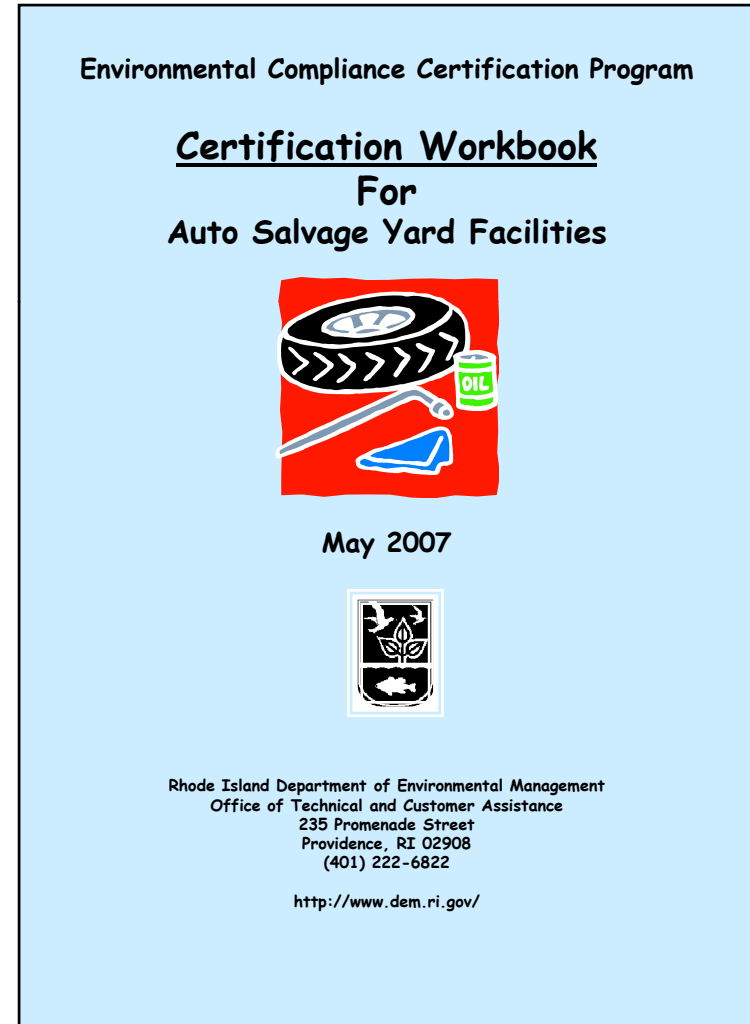


Auto Salvage Yard Facilities Certification Program

Compliance Certification

❖ The **Certification Workbook** covers the following areas:

- ✓ Benefits of Participation
- ✓ Program Requirements
- ✓ Areas of Concern:
 - ✓ Air Pollution Control
 - ✓ Freon/Refrigerant Recovery
 - ✓ Antifreeze Management
 - ✓ Lead Acid Batteries
 - ✓ Fuel/Gasoline
 - ✓ Auto Mercury Switches
 - ✓ Waste Tires
 - ✓ Used Oil
 - ✓ Wastewater Discharge
 - ✓ Stormwater Management
 - ✓ Hazardous Waste
 - ✓ Other Fluid Management
- ✓ Guidance Documents

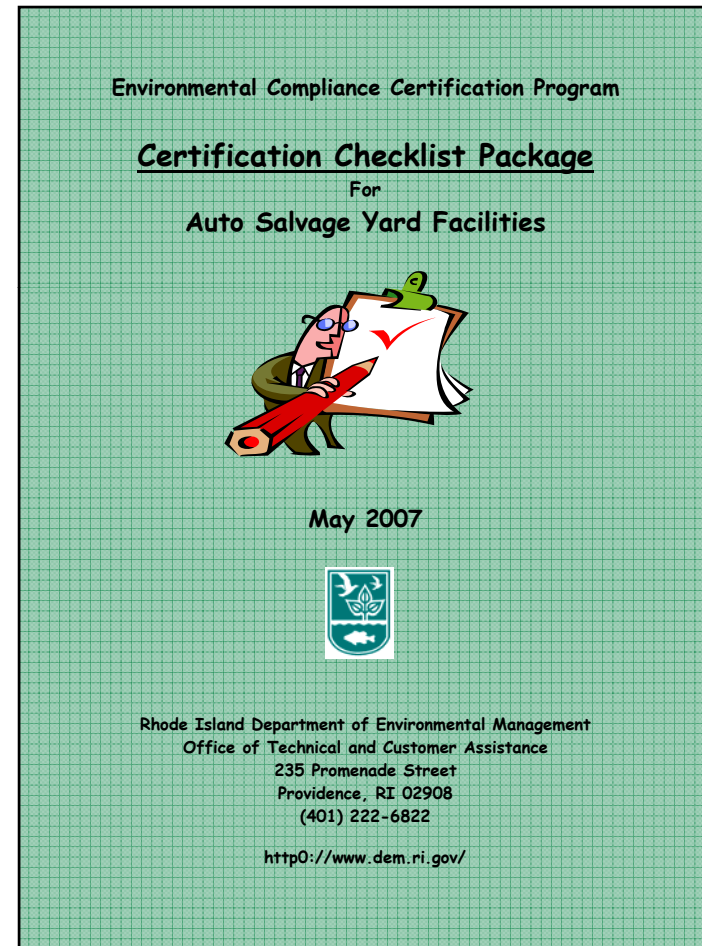




Auto Salvage Yard Facilities Certification Program

Compliance Certification

❖ The **Certification Checklist Package** contains the **Compliance Certification Checklist**, which contain a series of environmental compliance questions or questions relating to best management practices in various subject areas, pertaining to whether or not a facility is following the applicable federal and state environmental regulatory requirements, or employing best management practices.





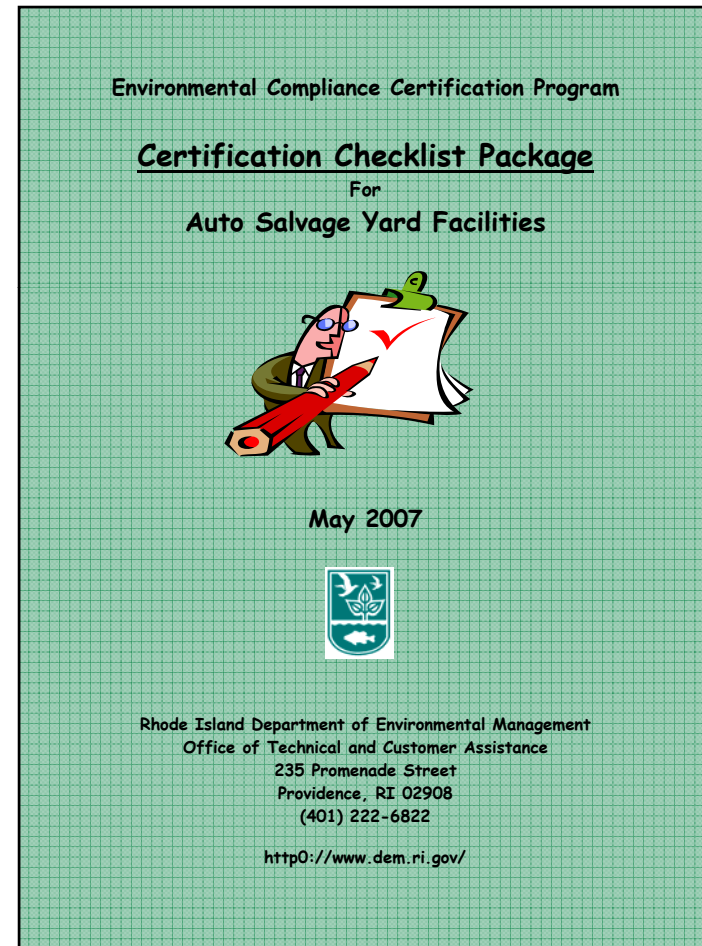
Auto Salvage Yard Facilities Certification Program

Compliance Certification

❖ **The Compliance Certification Checklist** contains questions that address regulatory requirements, that will show a notation to "Submit RTC" with a "No" answer

❖ When filed with the completed checklist, the Return-to-Compliance Plan (RTC) allows an operator time to correct an environmental regulatory issue to come into compliance without facing gravity-based penalties

❖ Best management practices are also found in the checklist, and do not show a notation to "Submit RTC"





Auto Salvage Yard Facilities Certification Program

Technical Assistance

- Technical assistance provided by DEM and URI during all phases of the project (prior to submitting certification, post certification)
- Provided via telephone calls, emails, and on-site visits as needed
- Actively interface with the Auto Recyclers of Rhode Island, a local trade association, including attending two association meetings
- Will continue to provide technical assistance as needed





Auto Salvage Yard Facilities Certification Program

Technical Assistance

Training Workshops -Topics

- ✓ Overview of pertinent multiple topics
- ✓ Hazardous Waste
- ✓ Stormwater Management
- ✓ Introduction to the Auto Salvage Yard Facilities Certification Program





Auto Salvage Yard Facilities Certification Program

Performance Measurement

Base-line audits were performed at forty-two (42) facilities in 2006

Some of the results found:

- ✓ Facility removing auto mercury switches - 12
- ✓ Technicians EPA certified for refrigerant recovery - 14
- ✓ Empty fuel tanks over impermeable surface - 30

Note: Not all activities/tasks applicable at all auto salvage yard facilities





Auto Salvage Yard Facilities Certification Program Results

- ✓ **Sixty-six (66) RI DBR licensees are now actively operating auto salvage yard facilities**
- ✓ **Of that number, thirty-seven (37) facilities returned completed Compliance Certification Checklists and are now participating**
 - ❖ **This is fifty-six (56) percent of actively operating facilities**
 - ❖ **One of these facilities is now in inactive status**
- ✓ **Three (3) licensees filed Non-Applicability Statements, with two of them in related businesses, and one (1) in the process of closing a facility and consolidating the business with another auto salvage yard facility that he owns**





Auto Salvage Yard Facilities Certification Program Results

Return-to-Compliance Plans (RTC)

- Filed with the Compliance Certification Checklist when a facility is out of compliance with an environmental regulatory requirement
- An RTC is filed with the completed checklist on matters that pertain to compliance with regulatory requirements, and not filed on matters that pertain to best management practices
- A total of Thirteen (13) Return-to Compliance (RTC) Plans were filed by eleven (11) facilities





Auto Salvage Yard Facilities Certification Program Results

Categories of Return-to-Compliance Plans (RTC) Filed

- Technicians EPA-certified for refrigerant recovery
- Complete and submit RIPDES Stormwater Management Permit Application
- Handle used oil filters properly
- Follow a written Stormwater Pollution Prevention Plan





Auto Salvage Yard Facilities Certification Program Results

Auto Mercury Switches

- ✓ In calendar year 2007, 10,713 auto switches containing mercury were delivered to the ELVS recycling contractor, yielding 23.57 pounds of recovered mercury
- ✓ The result was strongly promoted by :
 - ✓ Requirements of the Rhode Island Mercury and Education Act
 - ✓ Technical assistance through the Auto Salvage Yard Facility Certification Program
 - ✓ Active encouragement from the Auto Recyclers of Rhode Island to its membership





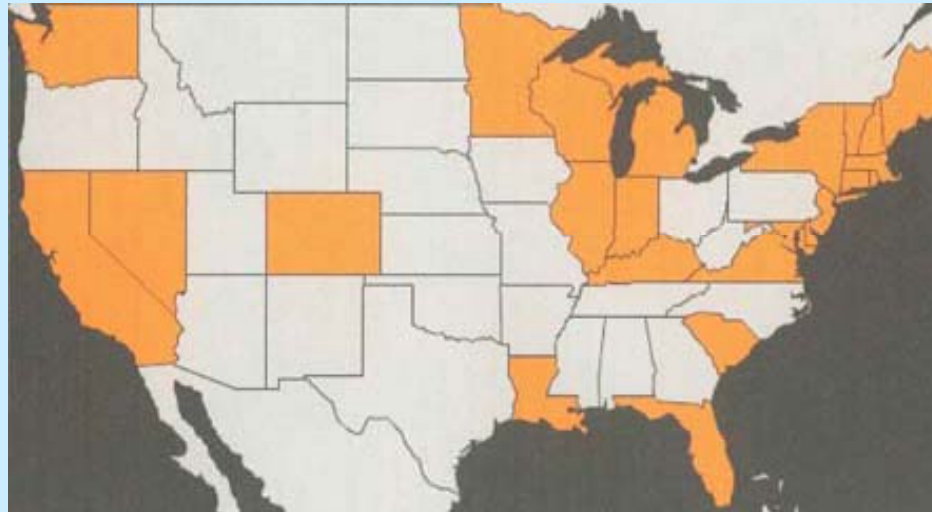
Auto Salvage Yard Facilities Certification Program

Performance Measurement

- Random post certification audits began in early 2008
- A minimum of twenty (20) facilities will be audited
- Random post certification audits are continuing at this time



Rhode Island DEM is a member and actively participates in the States ERP Consortium, as well as eighteen other States throughout the United States



ERP Consortium States, and ERP Learning States

The States ERP Consortium website can be found at

<http://www.erpstates.org/>



The States ERP Consortium was formed in 2006 to promote the Environmental Results Program

The primary goals of the States ERP Consortium:

- ❖ Share information and tools among states to help with ERP implementation
- ❖ Expand support for ERP within states and EPA
- ❖ Report and communicate ERP results to key audiences
- ❖ Identify potential new applications for ERP
- ❖ Identify strategies to accelerate and achieve economies of scale in automating ERPs



Auto Salvage Yard Facilities Certification Program

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RI Auto Salvage Yard Facilities Certification Program Webpage:
<http://www.dem.ri.gov/programs/benviron/assist/asy/index.htm>

