

Proposed Survey Instrument for On-Site Inspections

KEY:

Boldface Font – Spoken question

Normal Font – Site visit record/contacts and response options

Italics – Instruction for compliance assistance provider (not spoken)

Date of Visit: _____

Agency/Regional Office: _____

Assistance Provider: _____

Tel. _____

Facility

Name: _____

Facility

Address: _____

Name and Title of Facility Contact Person:

Telephone number of Facility Contact Person:

Introduction

Hi, my name is [interviewer name]. I am here on behalf of the U.S. Environmental Protection Agency. We are conducting a survey related to environmental practices at autobody shops. The survey will help EPA improve the assistance it provides to shops in complying with environmental regulations. Are you the person I should speak to about environmental issues in your shop?

(If no, ask to speak with appropriate person and repeat above introduction. The ideal respondent (in survey research this is called the "most knowledgeable person" -- MKP) is the person from the shop who keeps up with environmental requirements, is familiar with shop set up and operations, and perhaps receives information through training or attending workshops or manages the operations of the shop.)

Great. It will take us about 1 hr to walk through the shop and complete the survey, and your responses will remain anonymous. Is there an office, or a place where we can sit to go over some of the basic questions first?

Based on our observations and experience testing the survey out in shops, it works best to go through all interview questions up front in a quiet office area and then ask to be shown through the shop for observations

The purpose of this site visit is to ask about the shop conditions to help EPA develop appropriate future compliance assistance measures. The information gathered is not intended to be used for inspection or enforcement purposes. However, I am required to report conditions that appear to pose significant threat to human health or the environment or any significant violations.

SECTION A: INTRODUCTION

A1. Which of the following categories best describes your role at this shop? (read categories):

- Owner**
- Manager**
- Technician who applies spray coatings**
- Another role (specify)_____**

A2. a. Do the operations at your shop include the application of surface coatings to vehicles or parts?

- Yes**
- No → End survey**

b. When did initial construction of spray painting or paint stripping equipment begin?
_____ (Month/Year) _____ Don't recall

A3. Is this shop part of a corporate chain?

- Yes (specify which one)_____**
- No**

SECTION B: TRAINING

B1. a. Have your employees taken a training program that covers proper hazardous waste management procedures?

- Yes**
- No → Skip to B 2**
- Don't know → Skip to B 2**

b. Is the documentation related to the hazardous waste management training program present and available for review?

- Yes
- No
- Don't know

CA provider may examine documentation to determine whether or not shop has program. The CA provider will not evaluate the quality of the training program.

- Shop has training program
- Shop does not have training program
- Not sure

B2. a. Have ALL spray technicians been trained regarding spray equipment?

- Yes (all)
- Yes (some)
- No → *Skip to C 1*
- Not sure → *Skip to C 1*

b. Has the training addressed and/or included the following regarding spray equipment? (read responses; check all that apply)

- Selection**
- Set-up**
- Use**
- Maintenance**
- Hands on with equipment**
- Classroom**

c. Are the training records present and available for review?

CA provider may examine documentation (certificates, dates, places) to determine whether or not the spray technicians have been properly trained (meaning they have been trained in all 6 areas listed in question B2(b) above).

- All technicians have been properly trained.
- Some (but not all) technicians have been properly trained
- None of the technicians has been properly trained
- Records not available

SECTION C: AIR POLLUTANTS

When we walk through the shop, it would be helpful if you could show me your spray guns.

C1. a. Does your shop have a spray booth?

- Yes

___ No → *Skip to C2*

b. Are ALL spray coatings applied in the spray booth?

- ___ Yes
- ___ No
- ___ Don't know

c. When did your shop first begin using this spray booth to apply coatings? (read responses)

- ___ **Less than 2 years**
- ___ **2-5 years ago**
- ___ **More than 5 years ago**
- ___ **Don't know**

C2. a. Is the spray booth ventilated with an exhaust fan?

- ___ Yes, spray booth is ventilated
- ___ No, spray booth is NOT ventilated → *Skip to C3*
- ___ Don't know → *Skip to C3*

b. Do you know the capture efficiency rating of your booth exhaust system?

- ___ % Capture efficiency (*list numerical value*)
- ___ Don't know

c. Is the documentation related to the capture efficiency of your booth exhaust system present and available for review?

If respondent is unsure, note that this information would typically be found on the filter package or provided by the distributor. CA provider may review documentation to determine the capture efficiency:

- ___ % Capture efficiency (*list numerical value*)
- ___ Cannot find it

d. When was this booth exhaust system first used at your shop? (read responses)

- ___ **Less than 2 years ago**
- ___ **2-5 years ago**
- ___ **More than 5 years ago**
- ___ **Don't know**

When we walk through the shop, it would be helpful if you could show me your spray booth and exhaust system.

C3. a. Do you have a separate paint mixing room?

- ___ Yes
- ___ No → *Skip to C4*

b. When did your shop first begin using this mixing room? (read responses)

- Less than 2 years
- 2-5 years ago
- More than 5 years ago
- Don't know

C4. a. Do you have a prep station where coatings are applied on vehicle components?

- Yes
- No → Skip to C5

b. When did your shop first begin using this prep station? (read responses)

- Less than 2 years
- 2-5 years ago
- More than 5 years ago
- Don't know

When we walk through the shop, it would be helpful if you could show me the mixing room and/or the prep station.

C5. a. How do technicians at your shop typically clean the spray guns?

- Use a fully enclosed spray gun washer
- Use a fully enclosed spray gun washer and occasionally disassemble and clean by hands
- Flush with solvent (but don't spray)
- Spray coatings and/or solvent through the gun
- Clean disassembled gun by hand or through mechanical methods
- Other (specify) _____

b. When was this spray gun cleaning approach first used at your shop?

- Less than 2 years ago
- 2-5 years ago
- More than 5 years ago
- Don't know

When we walk through the shop, it would be helpful if you could show me the gun cleaning area and operations.

C6. Do you use waterborne paints?

- Yes
- No → Skip C8
- Don't know → Skip C8

C7. Do you use waterborne paints for your: (read responses)

- Basecoat
- Primer
- Other (specify) _____

C8. On average, about how many gallons of each of the following coatings are applied in your shop each week?

- Basecoat:** _____ gallons _____ don't know
- Primer:** _____ gallons _____ don't know
- Topcoat:** _____ gallons _____ don't know
- Total Estimate:** _____ gallons _____ don't know

C9. Who is your primary supplier of paint coating products?

Supplier: _____

Would you please provide contact information for that supplier? We are asking because we would like to partner with the suppliers to provide compliance assistance in the future.

Contact Information: _____

C10. Does your shop have Material Safety Data Sheets (MSDS) and coating formulation data supplied by the manufacturer for the solvents and coatings that you use? Is this documentation present and available for review?

CA provider observes documentation and records whether or not it is sufficient. If no physical documentation is available, CA provider will confirm if shop uses a color matching computer technology on-site that has formulation data in it, and if so, ask to see data.

- Yes, documentation available for all solvents and coatings
- Documentation available for some solvents and coatings, but not all
- Documentation not available for any solvents or coatings
- Don't know

C11. Do the coatings used by your shop contain any of the following hazardous air pollutants: chromium, lead, cadmium, nickel, or manganese (includes compounds of these metals)?

- Yes
- No
- Don't know

C12. a. Do you use chemical products for paint stripping tasks?

- Yes

- No → *Skip C13*
 Don't Know

b. What chemical products do you use for paint stripping?

List Products:

c. Have you checked these products for the presence of Methylene Chloride?

- Yes
 No
 Don't know

[e.g. StripRDry, Booth Floor Stripper both made by CMA Philadelphia, both contain MeCl]

When we walk through the shop, it would be helpful if you could show me the products.

C13. May I please see records related to your shop's methylene chloride usage?

CA provider examines documentation and records annual usage:

- _____ Gallons per year (as supported by documentation)
_____ Don't know; no documentation

C14. Does your shop have a minimization plan for use of MeCl? Could I take a look at it?

CA provider examines documentation and determines whether or not a plan exists:

- Yes, shop has minimization plan
 No, shop does not have minimization plan

C15. Have you heard of EPA regulations related to spray painting operations or paint stripping?

- Yes
 No → *Skip to D1*

C16. When did you first hear of these regulations?

- _____ Year
_____ Month
_____ Don't know

If another source, specify:

SECTION D: RCRA GENERATOR AND WASTE DETERMINATION

D1. About how much hazardous waste does your shop generate each month? (read options)

- 0 - 26 gal/mo (VSQG or equivalent)**
- 27-270 gal/mo (SQG)**
- >270 gal/mo (LQG)**
- Don't know or your waste hauler handles that for you**

When we walk through the shop, it would be helpful if you could show me the hazardous waste storage area.

D2. Is the documentation related to shipping these wastes off site present and available for review?

CA provider should review documentation if the answer to D1 above is "don't know."

- Yes
- No
- Don't know

When we walk through the shop, it would be helpful if you could show me where used rags and towels are stored.

D3. Do you treat the following as hazardous wastes: (read list of waste streams)

- | | • For each waste stream, check off relevant response: | | | |
|---------------------|---|---|--------------|---|
| • Waste streams: | • | • | • Don't Know | • Not Applicable (i.e., this waste stream isn't generated at all) |
| • Solvents | • | • | • | • |
| • Paints | • | • | • | • |
| • Sand blast debris | • | • | • | • |
| • Use rags | • | • | • | • |

- **Spray booth filters** • • • •
- **Antifreeze** • • • •
- **Waste oil** • • • •
- **Another hazardous waste stream** • • • •

If other, specify: _____

Note: Spent/used booth filters are typically being treated as solid waste. Advise shops that the only definitive way to know if those are non-hazardous is by testing (TCLP) to determine whether they are characteristic of hazardous waste.

SECTION E: EMERGENCY PROCEDURES (EPCRA)

E1. Have you implemented emergency procedures in your shop?

- ___ Yes
- ___ No
- ___ Don't Know

E2. Is the documentation related to your emergency procedures present and available for review?

CA provider reviews documentation and determines whether or not emergency procedures are in place:

- ___ Shop has emergency procedures in place
- ___ Shop does not have emergency procedures in place
- ___ Don't know

Note to CA provider: Emergency procedures can include: The shop posting the current name and telephone number of the emergency coordinator; posting the location of fire extinguishers and spill control material, and if present, fire alarm; posting the telephone number of the fire department, unless the shop has a direct alarm.

SECTION F: COMPLIANCE ASSURANCE

F1. How do you obtain information on how to comply with federal and state environmental regulations? (do not read responses; check all that apply)

- ___ Coating manufacturers or suppliers

- Corporate environmental division
- Educational institutions (vocational technical school, community college, specialized training center, etc.)
- Environmental consultant
- Other auto body shops
- Local government (town, city, or county)
- OSHA
- State environmental agencies
- Suppliers
- Trade association
- U.S. EPA
- Other (Specify) _____
- Don't know

F2. Has your shop been inspected or visited by a government environmental or health and safety official within the last six months?

- Yes
- No → *Skip to F 4*
- Don't know → *Skip to F 4*

F3. What type of government official inspected or visited your shop? (check all that apply)

- EPA
- State
- Local government (environmental, health or fire department)
- OSHA
- Other (specify) _____
- Don't know/Cannot recall

F4. a. Have you made any changes in the last year in your shop operations (e.g., the type of equipment you use, techniques you use, or training you provide)?

- Yes
- No → *Skip to F 5*
- Don't know → *Skip to F 5*

b. What changed?

Comment: _____

c. Why did this change happen?

Comment: _____

F5. Is there any other information about your shop's operations that you'd like to share before we walk through the shop together? Is there anything that you would like EPA to know or to do related to assistance or inspections or other activities that impact your operations?

Comment: _____

SECTION G: Walk Through *(The order of these questions may have to be rearranged based on the set up of the shop.)*

G1. May I see the spray guns you use? *(Check all that apply)*

- _____ HVLP (High Volume Low Pressure)
- _____ Electrostatic
- _____ Airless spray gun
- _____ Air assisted airless
- _____ Other (specify) _____
- _____ Don't know

Note for CA provider: If flow is 15-26 cubic feet per minute and PSI at orifice is less than 10 lb per square inch, then likely to be an HVLP spray gun. Other equivalent high transfer efficiency technology examples include: electrostatic application, airless spray gun, and air-assisted airless guns.

G2. *Verify the Manufacturer of the Spray guns:*

- _____ Manufacturer
- _____ Manufacturer
- _____ Manufacturer
- ___ Don't know

G3. **May I see the gun cleaning area, operations?**

CA provider observes cleaning procedures and categorizes cleaning technique:

- ___ Use a fully enclosed spray gun washer
- ___ Use a fully enclosed spray gun washer and occasionally disassemble and clean by hands
- ___ Flush with solvent (but don't spray)
- ___ Spray coatings and/or solvent through the gun
- ___ Clean disassembled gun by hand or through mechanical methods
- ___ Other (specify) _____

G4. **May I see your spray booth?**

___ *If no spray booth present, check here and skip to G7.*

CA provider performs visual inspection to confirm that spray booths, where coatings are applied to full vehicles, are fully enclosed and ventilated. Check all that apply:

- ___ Spray booth is fully enclosed with a full roof, four complete walls or side curtains
- ___ Spray booth is not fully enclosed
- ___ Spray booth is ventilated with an exhaust fan
- ___ Spray booth is not ventilated with an exhaust fan
- ___ There is evidence that at least some spray coating occurs outside of a spray booth

G5. **May I see the particle filter on the spray booth exhaust?**

CA provider performs visual inspection of pipe and filter and determines whether or not there is a particle filter on the exhaust:

- ___ Yes, the station has a particle filter
- ___ No, the station does not have a particle filter
- ___ Not sure

Note to CA provider: you may see a wall fan and small box with filter.

- G6. *Is the particulate filter in good condition? Look for rips or gaps in the particulate filters; check to see if the filters appear to be clogged with paint residue or dust.*

CA provider records condition of particulate filters:

- Good condition
- Fair condition
- Poor condition
- Don't know

If the filters are not in good condition, CA Provider should ask the shop to revisit manufacturer's recommendation.

G7. May I see your mixing room?

___ If no mixing room present, check here and skip to G8.

CA provider performs visual inspection to confirm that mixing room is enclosed and ventilated. Check all that apply:

- Mixing room is enclosed with a full roof and at least three complete walls or side curtains
- Mixing room is not enclosed as described above
- Can't tell if mixing room is enclosed

- Mixing room is ventilated with an exhaust fan
- Mixing room is not ventilated with an exhaust fan
- Can't tell if mixing room is ventilated

G8. May I see your prep station?

___ If no prep station present, check here and skip to G9.

CA provider performs visual inspection to confirm that prep station is enclosed and ventilated. Check all that apply:

- Prep station is enclosed with a full roof and at least three complete walls or side curtains
- Prep station is not enclosed
- Can't tell if prep station is enclosed

- Prep station is ventilated with an exhaust fan
- Prep station is not ventilated
- Can't tell if prep station is ventilated

G9. May I see the products you use for paint stripping?

Examine products for ingredients with methylene chloride.

- Yes, products with methylene chloride are used
- No, products with methylene chloride are not used
- Don't know/can't tell

G10. May I see your hazardous waste storage area?

CA Provider: Are all hazardous waste containers properly labeled with the words "hazardous waste" and clearly marked with the date on which accumulation began?

- Yes
- No
- Don't know

Note: CA provider will use best professional judgment to determine what is "clear" and "legible" and whether the shop made a "genuine and complete effort" to meet this requirement.

G11. CA Provider: What is the earliest date that accumulation began in any of the drums?

- _____ Month/year of earliest beginning accumulation date
- _____ Not sure / Drums poorly labeled

Note to CA provider: No storage limits for VSQGs; SQGs has a <4400lbs & 180 day limit, body shops are not expected to be LQGs.

G12. CA Provider: Are all hazardous waste containers closed unless waste is being added or removed?

- Yes
- No
- Don't know

Note: "closed" means that if the containers were tipped, nothing would spill. "Funnels" are acceptable if they are closed.

G13. CA Provider: Approximately how much hazardous waste is currently on site (excluding waste in satellite accumulation areas)?

- _____ Gallons of hazardous waste (approximate)
- _____ Not sure / Drums poorly labeled

G14. Can you please show me where you store used absorbent paint applicators such as shop rags and towels?

CA provider: are the containers closed when not in use?

- Yes, containers are closed

- No, containers are not closed
- Don't use rags, towels
- Don't know

G15. *Is there any indication of spills in or near the shop? CA provider will check for stains on the ground and in and around manholes, leaking tanks and containers and/or pooled liquids.*

- Yes
 - No
 - Comment
-

G16. *Does the shop appear to be operating in such a way as to violate the CAA 112(r)(1) general duty clause – namely: “The owners and operators of stationary sources producing, processing, handling or storing [a chemical in 40 CFR Part 68 or any other extremely hazardous substance] have a general duty [in the same manner and to the same extent as the general duty clause in the Occupational Safety and Health Act (OSHA)], to identify hazards which may result from... releases using appropriate hazard assessment techniques, to design and maintain a safe shop taking such steps as are necessary to prevent releases, and to minimize the consequences of accidental releases which do occur.”*

- Yes, shop appears to violate clause
- No, shop does not appear to violate clause
- Undetermined

Thank you for your time.

Provide site visit debrief and compliance assistance.