NMED New Mexico Environment

FACT SHEET FOR AUTO SALVAGE YARDS

This fact sheet has been drafted by the New Mexico Environment Department's (NMED) Hazardous Waste Bureau (HWB) to offer regulatory guidance to owners and operators of auto salvage yards.

Auto salvage yards are known to generate a variety of both hazardous and non-hazardous waste streams as a result of the vehicles that are stored in their yard and the dismantling and crushing activities of these vehicles. Wastes may include, but are not limited to:

- spent solvents
- degreasers
- cleaning fluids
- thinners
- used oils
- used brake fluid
- used transmission fluid
- used antifreeze
- used batteries
- part washer sludge
- tires, aerosol cans
- various scrap metal (lead tire weights)
- used diesel
- used gasoline
- mercury switches



Each salvage yard must determine which of its waste streams are hazardous. This determination can be done by:

- (1) collecting a representative sample of the waste stream and having it analyzed by a laboratory capable of conducting hazardous waste analyses, or
- (2) using process knowledge.

The facility must be aware that if it chooses to use option 2 it has the burden of proving that the knowledge is adequate and HWB inspectors may collect samples of the waste to verify the facility's determination. Analytical results from the laboratory must be kept on site and be available for inspectors.

Please note: Do not combine non-hazardous waste streams with hazardous waste streams. If combined, the waste streams are classified as a hazardous waste, must be managed and disposed of appropriately, and generally increases volumes and costs.



Engines, transmissions and other oily parts should be kept under cover and on an impervious surface to ensure that automotive fluids from the parts do not enter the environment. If automotive fluids accidently get released, they should be immediately cleaned up and stored in a labeled and closed container in good condition.

Salvage yards may generate the following waste streams, which should be evaluated to determine if they are hazardous waste:

<u>Parts washer solvent:</u> Even if the solvent is not hazardous waste prior to being used, once it has been used on engine parts it may become hazardous due to metal contamination.



<u>Waste antifreeze</u>: Antifreeze should be stored in closed and labeled containers in good condition. It should never be poured down the drain, on the ground, or left open because it is highly toxic to animals and humans. The hazardous waste determination is dependent on the type of vehicle the antifreeze was used in and the age of the vehicle. Keep in mind that laboratory costs to prove antifreeze is not hazardous are high. The best options are to purchase an antifreeze recycling machine or have it transported to a company that specializes in recycling antifreeze.

Spent solvents, degreasers, cleaning fluids and paint related wastes and thinners: Although the products used to clean and degrease parts may not be hazardous, they typically become hazardous due to metal contamination. Paint related wastes and thinners might be hazardous for the same reason, but may also be flammable.

Aqueous parts washers: Typically aqueous parts washers use soap and hot water to clean parts, typically producing a large amount of waste. They reuse the soap and water many times. Eventually the soap and water become too dirty to use, the water is evaporated off, leaving sludge. This sludge should be stored in labeled, closed containers in good condition and evaluated to determine if it is a hazardous waste. The sludge is typically hazardous due to metal contamination.



<u>Used gasoline and diesel:</u> Used gasoline and diesel should be stored in labeled and closed containers in good condition. Not only could they be ignitable, but they may also contain xylene, toluene and other hazardous constituents causing them to be a hazardous waste.

Contaminated soil: A common problem found at vehicle salvage yards is the release of automotive fluids to the soil during part and vehicle dismantling, storage, and vehicle crushing. Soil contaminated with oils, solvents or other substances should be cleaned up as soon as possible (usually within 24 hours) to avoid possible groundwater contamination and the exposure of humans to toxic substances. For spills of any substance that may cause harm to humans or the environment, NMED must be notified within 24 hours (during normal business hours dial 505-476-6000). The soil should be tested to determine if it is hazardous.

Remember, the burden of proof (whether the soil is hazardous or non-hazardous) falls on the facility. If the contaminated soil is hazardous, it must be handled and disposed of properly.



To avoid a release from a car crusher, drain fluids and remove batteries from cars upon arrival at the facility. Fluid and battery removal is required prior to crushing vehicles. Be sure to store all fluids and batteries properly. Vehicles must be crushed on an impervious surface with a berm to prevent fluids from releasing to the environment and to avoid soil and water contamination.

If recycled, the following waste streams are <u>not</u> considered hazardous waste:

<u>Used oils:</u> Typically used oils from engines are not hazardous. Place the used oils in containers that are in good condition, closed and clearly labeled. Small amounts of oil can seriously contaminate ground water.

<u>Used oil filters:</u> Used oil filters should be removed from the vehicles, drained of their oil for at least 24 hours into the used oil container and then stored in labeled containers.

<u>Used transmission fluid:</u> Used transmission fluid may or may not be mixed with used oil. Contact the company used to transport your used oil and ask them if they allow mixing of used oil and transmission fluid. If they don't, keep them in separate containers. Another company may have to be used for transmission fluid disposal.

<u>Used brake fluid:</u> As with transmission fluid, contact the company used to transport your used oil and ask them if they allow mixing of used brake fluid with used oil.



<u>Used batteries:</u> Used batteries removed from vehicles must be placed upright, not stacked over two high and must not be leaking. Don't accumulate large numbers (maximum of two pallets) before having them picked up by a recycler. Note that if they aren't recycled, they <u>are</u> classified as hazardous waste for disposal purposes.

<u>Used rags</u>: Used rags should be placed in closed metal containers and sent to a commercial laundry service.

<u>Used tires:</u> If the number of used tires stored on site exceeds 200, Solid Waste regulations must be followed. The Solid Waste Bureau has information needed to stay in compliance. A list of New Mexico tire recyclers is available upon request from NMED.



<u>Refrigerants:</u> Refrigerants (R12 and R-134) must be collected using Freon recycling machines, which must be operated by certified personnel.



<u>Mercury switches:</u> The toxic nature of mercury can cause serious problems to human health and the environment. Mercury is a persistent toxic substance that bio-accumulates. This means the concentrations of mercury accumulates in organisms as it goes up the food chain.

Some of the typical applications for mercury in automobiles can be found in lighting switches, anti-lock brake systems (ABS), and ride control systems. In addition, mercury can be found in HID lamps used for headlights and in the fluorescent lamps in Virtual Image Instrument Panels. Of the above mentioned applications, the two most common are

the tilt switches found in the hood and trunk lighting systems and in switches in ABS systems. The tilt switches typically contain small, bullet capsules that are usually made of steel or glass, which contains the elemental mercury. Hood and trunk tilt switches account for about 87 percent of the total mercury in 1999 or older vehicles.

<u>Aerosol cans</u>: First, be sure that all aerosol cans are empty. Typically, empty aerosol cans may be thrown into the trash and/or recycled.

<u>Wastewater</u>, <u>sludge</u> and <u>other liquid</u> waste <u>discharged</u> on <u>site</u>: No hazardous waste may be discharged down the drain. Regulations pertaining to discharge of waste to septic systems, cesspools or sewer/storm systems are stringent and must be permitted. Storm water runoff from the premises must also be controlled. Information about storm water permits is available from the Surface Water Quality Bureau.

Above all else, DO NOT dispose of any hazardous waste on-site. It is illegal to dispose of hazardous waste or used oil on site. By doing so, you may subject the facility to significant fines.

If you have any questions regarding making a hazardous waste determinations and regulations effecting salvage yards, please call the New Mexico Environment Department's Hazardous Waste Bureau for further assistance and information. The contact telephone number is (505) 476-6000.