

Automotive Towing

Best Management Practices For

Hazardous Materials/Waste Handling

(Updated April 2016)

Best Management Practices (BMPs) should be thought of as “good housekeeping” practices. In the automotive, towing and auto body repair industry, you may have waste streams regulated as hazardous waste by Federal & State laws. Many of these waste streams could be considered nonhazardous if properly recycled instead of disposed of in the trash or down the drain. Listed below are typical waste streams, along with procedures to help you comply with these regulations and help reduce the liabilities associated with noncompliance.

What to do at an Automobile Accident Site:

When you arrive at the accident site the Fire and Police departments will most likely have the area secured, eliminating any immediate danger. Under federal law (40 CFR 261.3 (D) & 263.30), it is your responsibility to collect any hazardous and non-hazardous waste resulting from the collision. All employees involved in the cleanup of hazardous waste must be trained to meet the requirements of OSHA Hazardous Communications or Hazardous Waste Operations and Emergency Response (29 CFR 1910). The guidelines below apply to storage and handling of hazardous waste **on the tow truck until it arrives at the storage facility.**

Typical wastes found at an accident site

- 1. Engine Coolant:** The most common hazardous waste you will find at a collision site is engine coolant (antifreeze). Often most of the coolant has leaked from the vehicle on to the road by the time you arrive. If coolant is still leaking from the vehicle, you must stop the leak before transporting the vehicle offsite and use absorbents to collect any coolant that has been discharged to the ground. Once the coolant is absorbed, the absorbent must be placed in a DOT-approved storage container (49 CFR 171), labeled “Absorbents Contaminated with Used Antifreeze,” and transported to a storage or disposal facility.
- 2. Engine Oil:** Commonly, you will encounter oil at a collision site. If oil is still leaking from the vehicle, you must stop the leak before transporting the vehicle offsite and use absorbents to collect any oil that has discharged to the ground. Once the oil is absorbed, the absorbent must be placed in a DOT-approved storage container (49 CFR 171), labeled “Absorbents Contaminated with Used Oil,” and transported to a storage or disposal facility. Used Oil may be mixed with fuel wastes or other oils (i.e. hydraulic fluid, transmission fluid, gear oil, and motor oil), provided doing so does not change the hazardous characteristic of the waste.
- 3. Fuel:** Fuel is among the most hazardous of fluids you will encounter at a collision site. If fuel is still leaking from the vehicle, you must collect it and stop the leak before transporting the vehicle offsite and use absorbents to collect any fuel that has discharged to the ground. Once the fuel is absorbed, the absorbents must be placed in a DOT-approved storage container (49 CFR 171), labeled “Absorbents Contaminated with Waste Fuel,” and transported to a storage or disposal facility. A small amount of fuel waste may be mixed with used oil waste, provided doing so does not change the hazardous characteristic of the waste. If a large amount of fuel is collected from the site, it is advised that this be stored separately from all other wastes during transport.

4. **Lead Tire Weights:** Lead tire weights may be found on site while cleaning up debris. These should be separated from the other debris and transported to a recycling facility.
5. **Debris:** Debris generated from the collision should be swept up and collected. Often, this debris will be considered non-hazardous and can be disposed of into a normal trash receptacle. However, if the debris contains chrome pieces, it may be regulated and will have to be disposed of as hazardous waste.

Absorbents (i.e. kitty litter, floor dry, rags, and absorbent pads) used in cleaning spills listed above can be disposed as follows:

1. Contract a hauler to take the waste from your storage facility.
2. Fill out an application with the County Waste-to-Energy Plant (WTE) and haul your own waste to the WTE plant.
3. If you are using rags as an absorbent you can contract with a uniform/rag service. Contracting with one of these companies may seem expensive, but it could save you money in disposal costs or fines for improper handling. These services are permitted by state and local agencies to recycle the rags. Used rags should be placed into a closed-lid container, which is properly labeled for the rag service, who will pick up and launder them.

Whichever disposal method you choose, be sure to obtain receipts, which will serve as proof of proper disposal. Since disposal of the wastes listed above requires a record, you cannot dispose of these wastes at auto salvage or scrap metal recycling facilities. Keep all receipts for a minimum of three years.

Note: If absorbents are mixed together they should be labeled as “absorbents contaminated with...” followed by whatever they absorbed.

Fluids and other waste collected at the site:

All waste collected at the collision site must be labeled appropriately. Antifreeze fluid should be labeled “Used Antifreeze”. Oil should be labeled “Used Oil.” Fuel should be labeled “Hazardous Waste Fuel.” When the vehicle and its wastes arrive at the repair facility, all wastes should be placed in the appropriate, properly labeled, collection containers. In the case of Used Oil, it must be placed in a storage container that is either double walled or has secondary containment. These wastes must then be hauled offsite by a registered waste hauler. A receipt for disposal must be obtained and kept for a minimum of three years.

NOTE: If you are not transporting the wastes back to your facility you will need to keep a log book of the wastes collected at the accident site. If possible, it is recommended that you obtain a copy of the disposal receipt when that facility has the waste hauled away.

If you have any questions, please call the Division of Natural Resources Management, Pollution Prevention (P²) Program at (239) 533-8821.