

## Parts Washing

**Parts washing** processes produce clean and presentable parts. It is an essential part of quality control. Professional auto recycling facilities have clean parts. Within the ARA community, these standards are laid out in the Gold Seal program. Gold Seal standards state that ROE Parts should be cleaned, if necessary, before being delivered, shipped, or brought to the customer at the counter to ensure “NO SURPRISES UPON DELIVERY.” Most facilities require designated personnel to perform quality and cleanliness checks using inspection and testing procedures that lay out an inspection process for parts as the part flows through the facility following the dismantling process to verify and update their condition in the Inventory Management System.

When parts are inspected, they may be flagged for cleaning through one of the usual parts cleaning methods. Any kind of parts washing creates a regulatory burden.

**Water-based** or aqueous cleaning can be done with a power washer using hot soap and water or in a sink type system or an enclosed cabinet parts washer. These processes generate commercial wastewater in need of disposal. If the facility is on a city sewer system, also called a POTW or Publicly Owned Treatment Works, wastewater can be sewer discharged with prior approval from or notification to the POTW. Auto recyclers on a septic system, as many are, cannot discharge wastewater to the sanitary system meant to be used for wastewater generated from handwashing, toilet use and mop water only. The disposal of that wastewater can be problematic. Options include hauling it to town under agreement with the local POTW or having a septic cleaning service continually suck it out of the sump pit for disposal. Power washing outside without collection or dumping wastewater “on the back forty” is not allowed from a regulatory standpoint. Mismanaged wastewater is a direct violation of stormwater regulations at the very least.

In the **Certified Auto Recyclers or CAR** program the standards simply ask:

- 1) *Is pressure/power washing conducted inside with overspray of oily wastewater lawfully discharged to sewer or contained and recycled or transported for allowable disposal for facilities with septic systems?***
- 2) *Is wastewater lawfully discharged to sewer or contained and recycled or transported for allowable disposal for facilities with septic systems?***

**Solvent** cleaning is not as common as it used to be possible because water-based basin parts washers work better than they used to, to clean parts. The aqueous parts washers are also pleasant to work with during the cold months given they have same temperature as a hot tub. None the less, solvent is still used for parts cleaning and thus creates a regulatory responsibility. Spent solvent must be managed as a hazardous waste with proper disposal through a recognized management company. Hazardous waste also has recordkeeping requirements. Each generator must keep a monthly log of hazardous waste generated and then adhere to the rule set forth based on the amount of waste generated.

Most auto recycling facilities will fall into the very small quantity generator or the small quantity generator category. These rules have reduced regulatory burdens as compared to large quantity generators. Some automotive wastes have special exemption from hazardous waste management standards if recycled. Lead-acid batteries and used oil are two examples of exemptions. Because these

wastes are exempt and other waste such as fuel and antifreeze are re-used and not disposed, solvent may be the only hazardous waste generated at an auto recycling facility.

The bottom line on solvent waste management is labeled and dated storage containers with good integrity and tracking the amount generated each calendar month on a hazardous waste log with timely off-site disposal through a permitted hazardous waste management company. Recordkeeping of the disposal manifests in backwards chronological order for the past three years is necessary too.

In the **Certified Auto Recyclers or CAR** program the standard asks: ***Are Spent Solvents managed as Hazardous Waste and manifested with a Hazardous Waste Management company?***

Even wiping down parts with solvent rags is a regulated activity. Although the management of spent solvent wipes is not a huge burden the rules still must be addressed. The **CAR** program the standard captures the essence of the rule in the question: ***Are spent solvent contaminated wipes stored in properly labeled, leak-proof containers until disposal in container properly labeled "Excluded Solvent-Contaminated Wipes" or no wipes are used?***

Parts washing produces clean and presentable parts for increased customer satisfaction and consistent quality assurance. With compliant processes in place producing clean parts can be worry free.