



# aware

Fall 2001

Environmental Assistance Network Newsletter

## Be a Leader! EAN Offers Opportunities for Dealers

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1-800-542-3914

**A**s a company with deeply rooted social values, Toyota Motor Corporation believes that environmental responsibility within the entire scope of vehicle production, distribution, resale and repair will be a valuable marketing differentiator in the future. Tremendous resources have been committed in everything Toyota does to become the global environmental leader at every stage of the vehicle life cycle.

All Toyota and Lexus dealers play a critical role in environmental leadership. In today's business climate, all dealership associates must be constantly aware of specific environmental practices and challenges that, if not handled properly, violate the law and contribute to environmental damage. The Environmental Assistance Network (EAN) helps you in your daily contributions to Toyota's leadership goal by providing environmental assistance 24 hours a day, 365 days a year. Key elements of the EAN program include:

**EAN Online** - Available through Dealer Daily, EAN Online is a centralized location for the resources to properly manage your dealership waste stream. The site is a cooperative effort between Toyota Motor Sales, U.S.A., Inc. (TMS) and the Coordinating Committee For Automotive Repair [CCAR]. A not-for-profit-organization, CCAR operates "CCAR-GreenLink," the national automotive environmental compliance assistance center, in conjunction with the U.S. EPA Office of Environmental Compliance and Assurance.

EAN Online includes an abundance of tools and information that can help the owner, manager or technician identify strategies, materials and methods that can reduce business costs and help you manage all forms of hazardous and non-hazardous wastes.

**EAN Topic Menu** - Central to the EAN Online home page is the EAN Topic Menu. Key federal and state environmental compliance information is constantly updated and easily searchable. Check here first for regulatory compliance and industry best practices.

**Virtual Shops** - The virtual shops, also located on the EAN Online home page, offer easy to use graphical navigation to information about many of

the most common environmental challenges faced by automotive service facilities.

**Checklist and Guidebook** - The EAN Online checklist and guidebook were developed by CCAR in cooperation with the U.S. EPA and TMS. *The checklist does not provide the complete environmental requirements necessary for a dealer to be in total compliance*, but by understanding the basics of each environmental program, a dealer can then seek appropriate assistance from various state and local agencies.

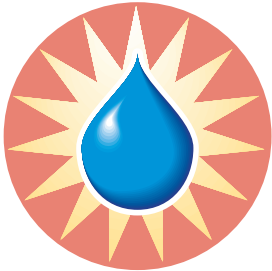
**AWARE Newsletter Archive** - Every issue of AWARE, dating back to 1994, is available in electronic format at the EAN site. An index is included where you can browse articles by subject matter, then link right to that issue with just a click of your mouse.

**EAN Hotline** - In the event you cannot find an answer to a specific environmental question using EAN online, a toll-free hotline is available 24 hours a day by dialing 1-800-542-3914. For requests outside business hours, leave a detailed message outlining your question, with your name, phone number, dealer name and dealer code. All messages are responded to within one business day.

**The Challenge** - In Toyota Motor Corporation's Annual Environmental Report, President Fujio Cho and Executive Vice President Kouske Shiramizu clearly defined Toyota's commitment to the environment:

*"To allow cars to be loved by a large number of customers and widely accepted by society in the 21st century as well, we have positioned the environment as our most important management priority and will continue to proactively tackle environmental issues throughout the life cycle of our vehicles."*

The Environmental Assistance Network serves as an example of this commitment. The challenge for all Toyota and Lexus dealers is to accept responsibility for your role in this environmental commitment. With the help of the EAN, make environmental leadership part of your business practices every day!



In 1972, Congress enacted The Clean Water Act as the primary federal law that protects our nation's waters, including lakes, rivers, aquifers and coastal areas.

## Keeping a "Dry Shop"

If history is a good indicator, the future of wastewater regulations is clear: discharge limits will continue to become more stringent. But you can minimize the impact of these regulations on your dealership service department by adopting a "dry shop" goal.

A dry shop is one that has sealed all its floor drains. Although a 100% "dry shop" may not be feasible in your area due to weather conditions (e.g., melting snow and ice), the methods and equipment presented in this article will help you reduce floor wash water volume and contamination. This, in turn, reduces your liabilities, protects the environment and community — and even saves you time and money spent cleaning floors.

pollutants to surface waters; violators can face imprisonment and fines of up to \$25,000 per day! Storm drain connections to indoor drains or sinks are prohibited in most areas. Floor drains must be tied to a sanitary sewer, connected to a self-containing holding tank, or plugged up.

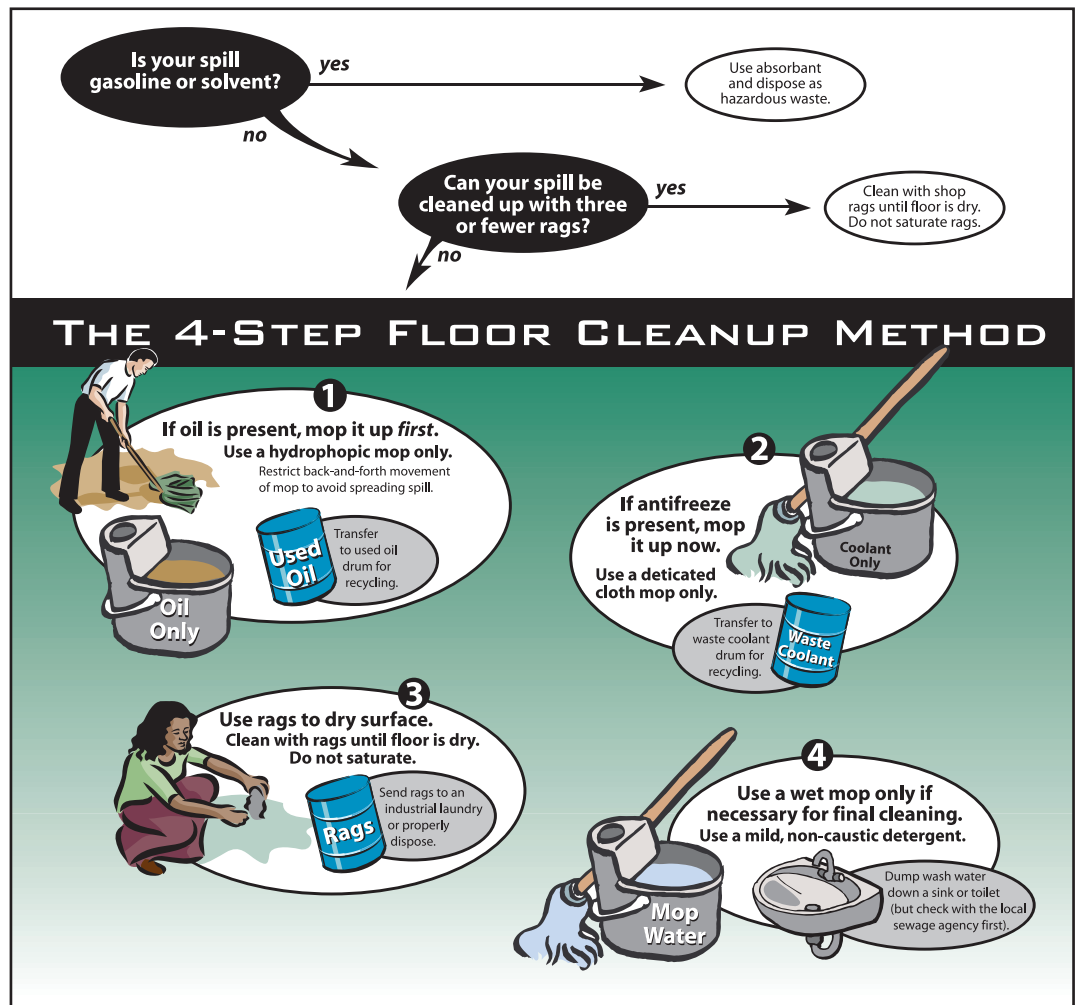
If you are tied into a public sewer system, make sure the treatment plant is capable of handling your waste. You may be required to have an oil/water separator or holding tank. Don't forget to maintain your oil/water separator; it doesn't do any good if it's overfilled with sludge.

If you have a septic system, be sure that only restroom wastes go into it. Don't pour coolants, solvents, or even commercially available cleaners and additives down the drain. They will hurt your septic system and the local water supply.

### Down the drain?

The Clean Water Act makes it illegal to discharge

(continued on next page)





## Keeping a "Dry Shop" (continued)

Small automotive service operations (a facility that is five acres or less) that have storm drains are currently exempt from federal rules governing what to do with runoff from rain, but — whatever your size — there may be local rules that require catch basins with oil/gas separators to be installed in storm drains. Keep waste waters from your service bays out of storm drains and construct berms around hazardous material storage areas in case there is a spill.

### Reduce your water usage

Minimizing wastewater generation will reduce environmental liability and help your shop stay ahead of tightening regulations. When used together, the following practices and equipment significantly reduce the amount of water needed to clean shop floors:

**Try to prevent spills** from ever reaching the floor.

**Stop if there's a drop!** If spills are not cleaned up immediately, workers can slip and fall. Ultimately, you will spend more time and money washing the floor by NOT cleaning up a spill right away. It's a good idea to have your technicians carry a shop towel in their pockets at all times so small spills can be wiped dry when they occur.

**Keep cleanup equipment well marked** in the event a medium-sized or larger spill occurs. For example, attach red flags to mop buckets used for spill cleanup so workers can easily locate them.

**Never hose down your work area!** This practice generates contaminated wash water that may be discharged to a sewer, or worse, is flushed out of the shop into a storm drain.

**If you use a pressurized washer** to clean your floors, be sure the wash water is disposed of properly. Even if a contractor performs pressure washing, your operation is responsible for proper management of the wash water runoff and can be held liable for its illegal disposal.

**Wastewater recycling systems** treat recovered water with special separators to segregate contaminants from water. Extracting contaminants from used water reduces the volume of wastewater and, in turn, creates cost savings from less frequent waste pickups. The reclaimed water can be reused for irrigation or other cleaning activities.

### Other Equipment & Practices

**Sealing your shop floor with epoxy or other suitable sealant** can be expensive, but there are several benefits. An epoxy-sealed floor: won't absorb spills as a concrete floor does, making spill cleanup easier; requires less time and water to clean; and lasts for years and reduces long-term liability for cleanup of a contaminated shop floor and soil below. In addition, a sealed floor looks great to customers and technicians alike!

**Floor scrubbers that reuse or recycle the wastewater** will keep a shop clean and safe. By reusing the wastewater, you are minimizing the amount of water your shop uses, and in turn reducing your utility bill.

**Hydrophobic mops** can be used to clean up oil spills. (The mop is made from polypropylene, which absorbs hydrocarbons, but is water repellent or "hydrophobic." Such mops absorb oil only, and cannot be used for water or antifreeze.) Be sure to transfer the mop to your used oil drum after use.

**Pads, pillows and mats** are essential absorbent devices. Keep them on-hand to prevent large spills from spreading. After use, wring out the absorbed fluid into the proper drum for recycling or disposal, and reuse the absorbents.

**Spent absorbent devices must be disposed of properly**, which involves determining whether the spent absorbent is a hazardous waste. Be sure to check with state and local contacts to confirm applicable regulations.

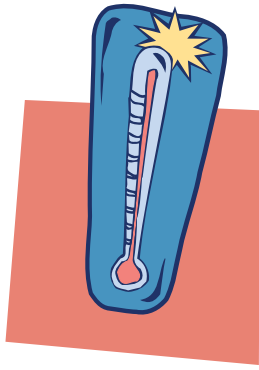
**Floor sweep (grease sweep, "kitty litter," rice hull, etc.)** should be used only when the spill cannot be cleaned with shop towels or dedicated mops. Restrict the use of these absorbents to cleaning up gasoline, solvent, or other hazardous waste chemical spills. Floor sweep can be processed to reclaim absorbed compounds. Ask your local environmental materials supplier about recycling opportunities for spent floor sweep.

TMS and the Environmental Assistance Network are committed to help dealers in pursuit of the "dry shop" goal. Much of the equipment mentioned is available as part of the Toyota/Lexus Approved Dealer Equipment Program. Check the program catalog or call 1-800-368-6787 for more information on environmentally friendly service equipment and waste stream management supplies.

(Source: US EPA Region 9)



**Always stop if there is a drop!  
Cleanup spills immediately!**



For a list of vehicle components that contain mercury on most vehicle makes and models, go to CCAR at [www.ccar-green-link.org/links/mercury.htm](http://www.ccar-green-link.org/links/mercury.htm).

Mercury spill kits are available from the following suppliers:

Lab Safety Supply™  
([www.labsafety.com](http://www.labsafety.com))  
800-356-0783

Fisher Scientific  
International Inc.  
([www2.fishersci.com](http://www2.fishersci.com))  
800-772-6733

## Get the (Mercury and) Lead Out!

**M**ercury and lead are two naturally occurring elements with valuable electrical or physical characteristics that have been used in automobiles and trucks for many years. Both elements also have been identified as toxic to humans and the environment.

Mercury exposure can cause tremors, inability to walk, convulsions, and even death. At levels more commonly seen in the United States, the

*The quantity of lead and mercury components in vehicles today may be small, but its impact can be significant.*

reproductive problems, high blood pressure, digestive problems, nerve disorders, memory and concentration problems, and even muscle and joint pain.

All auto manufacturers have taken steps to significantly reduce the usage of components containing these elements; however, automotive service facilities will be faced with handling and disposing of these components for years to come. The quantity of lead and mercury components in vehicles today may be small, but its impact can be significant.

### Mercury

**Typical automobile parts that may contain mercury include:**

- Tilt switches used in under-hood and trunk lighting.
- Four-wheel drive and anti-lock braking system sensors.
- High-intensity discharge lighting.
- Virtual image instrument panels and Navigation System Display Units.

The simplest and most cost effective way for dealers to dispose of their hazardous waste is to contact a local hazardous waste disposal company. When interviewing potential service providers, make sure the company is a licensed metal recycler that reclaims mercury.

Store substances containing mercury in a dedicated recycle bin labeled as "spent mercury containing devices". EPA regulations allow you to store these items for a maximum of one year. When the container is full — or one year has transpired — contact your hazardous waste pick up company to dispose of the products. Your facility must retain all disposal or recycling receipts pertaining to the removal of the products for a minimum of three years.

**If a small spill of mercury does occur, a quick and complete cleanup can prevent excessive human exposure:**

- Keep spilled area ventilated.
- Don't use household cleaners, particularly ammonia or chlorine.
- Never pick-up spilled mercury with a vacuum.
- Push the mercury beads together with a card, stiff paper, or squeegee to form larger droplets, and then push them into a plastic dustpan — or use an eyedropper to pick up the balls of mercury. Mercury's high density and smoothness cause it to roll fast. Work from the outside of the spill area toward the center.
- Use a flashlight to look all around in the areas of the spill. The light will reflect off the shiny mercury beads and make it easier to see them.
- Sprinkle sulfur powder on the spill area after cleaning up beads of mercury; a color change from yellow to brown indicates that mercury is still present, and more cleanup is needed. Sprinkle zinc flakes or copper flakes (available at hardware stores) to amalgamate (clump together) any small amounts of mercury that remain. Sulfur powder, zinc and copper flakes are included when you purchase a "mercury spill kit". (See sidebar for suppliers.)
- Collect all mercury and all mercury-contaminated items into a leak-tight plastic bag or wide-mouthed sealable plastic container. Work over a tray or box that is lined or covered with plastic wrap when pouring mercury.
- Save the bag or container to take to a mercury-recycling center.

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## Dealer, Toyota Receive Environmental Honors

**J**ames Botsacos, owner of **James Toyota Outlet** in Flemington, N.J., was one of thirteen New Jersey business owners honored last Earth Day for their outstanding contributions to a better environment and the protection of human health. Botsacos received the **Environmental Protection Agency (EPA) Environmental Quality Award** for the design and operation of his unique, eco-friendly Toyota dealership. Christie Whitman, U.S. EPA Administrator and former Governor of New Jersey, presented the award.

**Toyota Motor Sales, U.S.A. (TMS), Inc.**, was among seven recipients in June of the **2001 Corporate Conscience Award** for forward thinking and socially responsible accomplishments from the Center for Responsibility in Business. The award recognized TMS for its introduction of the "Prius" as the world's first mass-produced vehicle powered by both gasoline and electricity.

Toyota received the award at the 15th Annual Corporate Conscience Awards Dinner in New

York. The Center for Responsibility in Business (formerly the Council on Economic Priorities), founded in 1969, is a nonprofit, public service research organization dedicated to accurate and impartial analysis of the social and environmental records of corporations.

In July, the U.S. Department of Energy and the U.S. Environmental Protection Agency (EPA) honored TMS with a **2001 Green Power Leadership Award**. TMS was one of seven recipients recognized at the National Green Power Conference in Portland, Ore., for its efforts to meet corporate electricity needs while helping to protect the environment.

TMS was the first, large company in California to purchase direct access to renewable electricity for its facilities in April 1998, just 29 days after the state's electricity market deregulated. This agreement also marked the largest purchase of renewable energy at the time. In 2000, Toyota's greener power contracts were estimated to be the equivalent amount of power consumed annually by 6,000 average California homes.

## Get the (Mercury and) Lead Out! *(continued)*

### Lead

The most common sources of lead in automobiles are:

- Lead-acid batteries
- Tire weights
- Battery cables

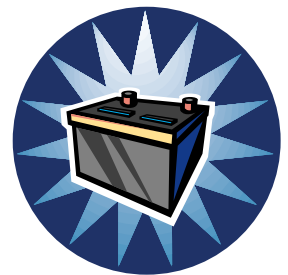
Parts containing lead can be disposed of in much the same way that parts containing mercury are handled. For instance, lead parts can be recycled with a metal recycler and stored in a dedicated container labeled "Lead Parts for Recycling". Make sure that the container you use is strong enough to hold the weight of the lead. Take special care with flooded cell lead-acid batteries as the electrolyte is considered hazardous waste.

Similar to mercury, lead parts can be stored for a maximum of one year, and dealers must

retain all disposal or recycling receipts for a minimum of three years. [For more information on handling lead-acid batteries, see the Summer 2001 issue of AWARE.]

As with any hazardous material, be sure to investigate local regulations and guidelines for proper handling and recycling. Check the State and Local Contacts page on the EAN website for phone and address information. The links below will also lead you to additional details on lead and mercury recycling.

[www.epa.gov/mercury](http://www.epa.gov/mercury)  
[www.dep.state.fl.us/dwm/programs/hazardous/fact/auto\\_recyclers.pdf](http://www.dep.state.fl.us/dwm/programs/hazardous/fact/auto_recyclers.pdf)



For more information on handling lead-acid batteries, see the summer 2001 issue of AWARE at EAN online through Dealer Daily.



## **EPA Enforcement Actions**



### **Truck Repair Facilities Must Pay Penalties for Dumping Oil**

The U.S. EPA has ordered Cummins Northwest, Inc. and Myrmo Sons, Inc. of Bend, Ore., to pay penalties for illegally disposing of waste motor oil and other motor vehicle waste fluids directly underground and potentially into underground drinking water sources.

EPA inspectors visited each company's facilities in August 2000 and observed the use of drilled boreholes to dispose of waste motor oil and other motor vehicle waste fluids at the Myrmo and Cummins sites. All wells had been used for daily waste fluid disposal for at least the past five years.

The practice of disposing of waste motor oil and other motor vehicle waste fluids into injection wells, e.g., dry wells, drainfields, sewage drain holes, and sumps, has been banned in Oregon since 1984, and a nationwide prohibition came into effect in 2000. In addition to fines of more than \$10,000 to each company, EPA is seeking to require both facilities to close the illegal wells and clean up the contamination they caused.

Automotive repair facilities historically have used injection wells for waste disposal, but since the 1984 Oregon ban and the 2000 federal ban, facilities are required to cease injection and to employ safe, alternate disposal methods. Due to this newly identified gap in compliance, the EPA will continue inspections of this type of facility and will take enforcement action where violations are discovered.

### **Florida Residents, Companies Charged with Illegal Importation of Vehicles**

Two companies and four residents in the Miami area have been charged with illegally importing automobiles that did not conform to federal environmental and safety standards. Individual Automobile Imports, Inc., Container Services International, Inc., Kai Stadler, Thomas Kahnt, Nicole G. Schmidt and Alp Eke allegedly devised and participated in a scheme to defraud the U.S. Customs Service, the U.S. EPA and the National Highway Traffic Safety

Administration by importing foreign vehicles that did not meet American standards.

Federal law allows non-standard vehicles to be brought into the United States for up to one year if they are used only for personal use by visiting foreign nationals and are exported when the one-year grace period has expired. The defendants claimed that the imported vehicles were for temporary personal use, but they then obtained American titles for the vehicles and sold them. Selling non-standard vehicles that do not meet American environmental standards makes it difficult for localities to control air pollution, which causes a variety of respiratory diseases. The EPA's Criminal Investigation Division, the U.S. Customs Service, the U.S. Department of Transportation and the Miami-Dade Police Department investigated the case.

### **Michigan Men Sentenced in Case Related to Intentional Dumping of Diesel Fuel**

Two Michigan men were sentenced in August to over two years imprisonment each and a total \$1 million in fines and restitution for committing an environmental offense under the Racketeering Influenced and Corrupt Organizations (RICO) Act. They were officials of Hi-Po of Northfield, Mich., who were sentenced for violating the Clean Water Act on two occasions. Aaron Smith of Northville, Mich., former president and owner, and Steven Carbeck of Ann Arbor, Mich., Hi-Po's former operations manager, were sentenced.

Smith received 33 months imprisonment and Carbeck 27 months. In addition, Smith will pay restitution of approximately \$500,000 to several victims and he will also forfeit an additional \$500,000 in funds obtained through illegal activity. Carbeck will be responsible to join Smith in paying \$430,000 of the restitution. Hi-Po will pay a \$50,000 fine and will make a total of \$75,000 in restitution payments.

In their guilty pleas in February, Hi-Po admitted intentionally releasing diesel fuel into a storm sewer and a pond in Ann Arbor to make a fraudulent claim and receive payment from the University of Michigan and the Michigan



## **Enforcement Actions** *(continued)*

Department of Environmental Quality to clean up the releases. Smith and Carbeck admitted that they illegally profited from Hi-Po's unlawful activities. Smith's RICO plea included illegal money laundering, mail fraud and bribery of a public official. Carbeck's guilty plea included admission of money laundering and mail fraud. The EPA's Criminal Investigation Division, the FBI and the University of Michigan Department of Public Safety investigated the case.

### **Owner/Operators of Automotive Business Sentenced for Hazardous Waste Violation**

Michael R. Kyle and Edward L. Johnson of Chattanooga, Tenn. were sentenced in July for violating the Resource Conservation and Recovery Act (RCRA) by abandoning ignitable and/or hazardous waste.

Kyle was sentenced to ten months confinement and three years supervised release. Johnson was sentenced to six months confinement and three years probation. They also were ordered to pay \$9,540 each in restitution.

Prior to 2000, Kyle and Johnson owned and operated Custom Concepts Inc., in Chattanooga, which produced fiberglass automobile parts, repaired collision damage and sold after-market auto parts. That year, when the defendants moved their business, they abandoned 70 drums of waste at their former business site. A number of the drums were tested and found to contain acetone, toluene, xylene and chromium, creating a potential fire and poisoning hazard.

### **Wheeling, W.Va., Cited for Underground Storage Tank Violations**

The U.S. EPA has cited the City of Wheeling, W. Va. for violating regulations designed to prevent fuel leaks from underground storage tanks.

EPA issued an administrative complaint against the city, which owns and operates the Wheeling Municipal Garage at 12 Hunter Ave. The garage has two 10,000 gallon underground gasoline

tanks, two 8,000 gallon and one 2,000 gallon diesel fuel underground storage tanks, and aboveground storage containers capable of holding at least 7,500 gallons of used oil.

EPA alleges a December 2000 inspection revealed that the garage failed to conduct proper leak detection for its underground tanks and failed to conduct bimonthly tests of the tanks' corrosion protection systems. The complaint also alleges the garage failed to clearly mark or label used oil containers at the facility. EPA seeks a \$12,373 penalty for these alleged violations.

With millions of gallons of gasoline, oil, and other petroleum products stored in underground storage tanks throughout the U.S., leaking tanks are a major source of soil and groundwater contamination. EPA and state regulations are designed to reduce the risk of underground leaks, and thus avoid the costs of major cleanups.

The city has the right to a hearing to contest the alleged violations and proposed penalty.

### **EPA Cites Firm for Violations in Refrigerant Recovery & Recycling**

U.S. EPA Region 5 has cited Ritchie Engineering Co. Inc., Bloomington, Minn., for alleged violations of federal regulations on refrigerant recycling at the company's refrigerant recovery and recycling equipment manufacturing plant in Garrett, Ind.

The equipment is designed to recover and recycle hydrochlorofluorocarbon and chlorofluorocarbon refrigerants that deplete ozone levels in the upper atmosphere, if they are allowed to escape.

The EPA citation alleges Ritchie Engineering failed to have six of its refrigerant recovery and recycling equipment models certified by an approved equipment testing organization as required by federal regulations.

Chlorofluorocarbon refrigerants deplete the stratospheric or "good" ozone layer, allowing dangerous amounts of cancer-causing ultraviolet rays from the sun to strike the earth. Production of some of these chemicals was stopped in 1995, and federal law strictly controls their use and handling.



Under RCRA, passed by Congress in 1976, EPA controls hazardous wastes from their production to their final disposal.



## Federal Environmental Hotlines

Clean Air Act	(202) 564-7400
Clean Water Act	(202) 260-5700
Community Right-to-Know	(800) 424-9346
Department of Transportation (DOT Hazardous Materials)	(800) 467-4922
Environmental Protection Agency (EPA) Hazardous Waste	(703) 308-8880
Occupational Safety & Health Administration (OSHA)	(800) 321-OSHA
RCRA (EPA Region IX only)	(415) 744-2074
RCRA/Superfund/UST	(800) 424-9346
RCRA/Superfund (EPA Region II - NJ only)	(800) 346-5009
RCRA/Superfund (EPA Region II - NY only)	(800) 424-9346
Refrigerant Recycling	(800) 296-1996
Safe Drinking Water	(800) 426-4791
Small Business and Asbestos Ombudsman	(800) 368-5888
Spill Prevention, Control and Countermeasures	(202) 260-2342
Stormwater NPDES Permitting	(202) 564-0040
Stormwater (Phase I)	(202) 260-9526
Stormwater (Phase II)	(202) 260-7786
For Others Not Listed	(800) 542-3914

for additional information go to EAN Online though Dealer Daily.



### aware


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CCAR®  
Design and Production

aware is published by the Product  
Quality & Service Support  
Department, Toyota Motor Sales,  
U.S.A., Inc.

Address all correspondence to:  
Environmental Assistance Network  
c/o Product Quality & Service  
Support Department  
Mail Drop S203  
Toyota Motor Sales, U.S.A., Inc.  
19001 South Western Avenue  
Torrance, CA 90509

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 Printed on recycled paper.

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