

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

Sunline, Inc.
4000 6th Street SW
Cedar Rapids, Iowa 52404
(319) 364-4000

EPA ID Number: None

On

November 15, 2022

By

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 7
Enforcement and Compliance Assurance Division (ECAD)

1.0 INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division, I conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Sunline, Inc. (Sunline), located in Cedar Rapids, Iowa, on November 15, 2022. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. The facility had not been inspected previously for RCRA compliance. I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. The inspection report and attachments present the results of the CEI.

2.0 PARTICIPANTS

Sunline:

Jay Cassill, Owner, approximately one year at this facility.

Nick Ackerman, Yard Foreman, approximately one year at this facility.

Chad Olson, Inventory Foreman, approximately 10 years at this facility.

U.S. Environmental Protection Agency (EPA):

H. D. "Doug" Bryant, CPP, PCI, Civil Investigator, SEE, ECAD/Chemical Branch/RCRA Section

3.0 INSPECTION PROCEDURES

Prior to beginning the inspection, I conducted a visual reconnaissance of Sunline on November 15, 2022, searching for areas of concern observable from the adjacent roadway. No environmental issues or areas of concern were observed during this preliminary examination. I arrived unannounced at Sunline at approximately 08:30 hours, November 15, 2022. I parked outside the facility in a small parking lot. I entered the facility through the main entrance and was greeted by one of three employees working behind a parts sales counter. The employee asked the nature of my business, to which I responded. She responded that she would summon the owner, Mr. Jay Cassill, who was on his way to work. She asked me to be seated in the lobby area while she reached out to Mr. Cassill. Shortly thereafter, Mr. Cassill arrived and invited me to his office.

After exchanging pleasantries and business cards with Mr. Cassill (Attachment 1), I started my entrance briefing. I presented my EPA credentials to Mr. Cassill. I next presented Mr. Cassill a copy of RCRA section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented him a copy of Title 18 U.S. Code, Sections 1001 and 1002. He was made aware of his confidentiality rights and was informed that a Confidentiality Notice would be provided at the end of the inspection to make or not to make any claims. Mr. Cassill acted as the official Sunline representative throughout this inspection and participated in all facets of the inspection except the visual inspection of the facility. Mr. Cassill asked that Mr. Ackerman join us for the entrance briefing. Mr. Ackerman was summoned to Mr. Cassill's office. Upon his arrival, I presented my EPA credentials to Mr. Ackerman. I next presented Mr. Ackerman a copy of RCRA section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented him a copy of Title 18 U.S. Code, Sections 1001 and 1002. He was made aware of his confidentiality rights and was informed that a Confidentiality Notice would be provided at the end of the inspection to make or not to make any claims. Mr. Ackerman participated in the entrance briefing, discussion of facility operations, waste generation and waste management, and the visual inspection of the facility.

The inspection consisted of an entry briefing, a discussion of facility operations, waste generation and waste management, and a visual inspection of the waste generation and management areas, and an exit briefing. A site map of the facility is attached (Attachment 2). This attachment was annotated to document the location of photos taken during the visual inspection of the facility.

Document photocopies and 15 photographs were collected as inspection documentation (Attachments 1-9). The locations for photos are annotated on Attachment 2. Information collected during the CEI was recorded on a checklist and in field notes. I followed the inspection procedures discussed in the RCRA Compliance Evaluation Inspection Standard Operating Procedure (No. 2321.01D), unless noted differently.

At the conclusion of the inspection, I conducted an exit briefing, during which I summarized my findings and recommendations with Mr. Cassill. I provided Mr. Cassill a *Confidentiality Notice*, which he signed, indicating no confidentiality claims were made by the facility

(Attachment 3). I provided Mr. Cassill a *Receipt of Documents and Samples* which he signed acknowledging receipt (Attachment 4). I provided Mr. Cassill a *Notice of Preliminary Findings* which he signed acknowledging receipt (Attachment 5).

The following inspection documents and compliance assistance handouts were left with the facility:

Section 3007 Inspections Sheet (EPA Handout)
RCRA Facility Access Information Sheet (EPA Handout)
United States Code Annotated (EPA Handout)
Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections (EPA Handout)
Notice of Preliminary Findings (EPA Handout)
Instructions for Responding to a Notice of Preliminary Findings (NOPF) (Reverse of NOPF)
U.S. EPA Small Business Resource Information Sheet (EPA Handout)
Solvent-Contaminated Wipes Final Rule Chart (EPA Handout)
Excluded Solvent-Contaminated Wipe Rule (IDNR Handout)
Battery Recycling/Disposal (IDNR Handout)
Universal Wastes Including Aerosol Cans (IDNR Handout)
Environmental Compliance Assistance Centers (EPA Handout)
e-Manifest Fact Sheet (EPA Handout)
Emergency Response Program (EPA Handout)
Managing Your Hazardous Waste: A Guide for Small Business (EPA Handout)

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

Sunline is a vehicular salvage and recycling facility that sells truck and car parts and used vehicles. Salvaged vehicles are processed, dismantled, stored, and sold/crushed on site. Sunline occupies approximately 40 acres and operates five buildings with approximately 10,000 square feet under roof. The facility began operating in the 1960's and was purchased from the original owners by Mr. Cassill and his brother approximately one year ago. Sunline receives salvaged vehicles, processes them by identifying and segregating repairable vehicles and removing valuable parts, draining fluids, and removing selected components, e.g., engines and transmissions from the remainder. Parts and components are cleaned up for resale. Vehicle bodies are positioned throughout the salvage yard. When no longer useful for parts generation, the vehicle bodies are crushed onsite using a large vehicle crushing unit. Crushed bodies are picked up and transported offsite as scrap metal. Sunline is a member of the Iowa Automotive Recyclers Association. Mr. Cassill stated that the facility is being cleaned up for potential sale of the property, which is in a light-industrial area of Southwest Cedar Rapids, Iowa. Sunline employs approximately 18 personnel working 08:00-17:00, Monday-Friday. The North American Industry Classification System code for this facility is 441330-Automotive Parts and Accessories Retailers.

4.2 RCRA Status

The Hazardous Waste Site Info Verification Report for Inspector (Attachment 6) identifies the facility as an undetermined generator of hazardous waste. However, I determined that Sunline generates less than 55 pounds of known hazardous per month. Therefore, I inspected Sunline as a Very Small Quantity Generator of D001, D018, and D039 characteristic hazardous waste. In addition, I determined Sunline to be a used oil generator. Mr. Cassill explained that the facility converted all industrial lighting from fluorescent to light emitting diode (LED) fixtures and does not generate or manage spent fluorescent lamps. Mercury containing equipment is managed as universal waste. Therefore, I inspected the facility as a small quantity handler of universal waste. Spent lead-acid batteries are sent offsite for reclamation in accordance with 40 CFR Part 266, Subpart G.

4.3 Facility Waste Streams and Management

The following waste streams are managed by Sunline:

Waste Parts Washer Solvent: Mr. Cassill stated that Sunline generates approximately 30 gallons of waste parts washer solvent every 12 weeks. The parts washer is serviced and maintained by Norsolv Environmental Services, 1000 Rainbow Drive, Post Office Box 418, Waterloo, Iowa. An invoice for the service provided is attached (Attachment 7). Attachment 7 describes the waste parts washer waste stream as NA 1993, Waste Combustible Liquid, n.o.s (Contains Petroleum Naptha) (EPA D001, D018, and D039 characteristic hazardous waste). The product specification for this product is described in safety data sheet (Attachment 8). The parts washer is used to clean grease dirt, and grime from selected parts.

Waste Paper Disposable Wipes: Mr. Cassill stated that Sunline generates approximately 200 waste paper disposable wipes weekly. The wipes are used to clean employee's hands, wipe cleaned parts, and clean equipment. Mrs. Cassill stated that the waste paper disposable wipes are not contaminated with solvents, non-RCRA hazardous by virtue of product and process knowledge and are disposed in the general trash. I did not observe any waste paper disposable wipes being generated during this inspection.

Scrap Metal: Mr. Cassill stated that Sunline generates approximately between 30,000-40,000 pounds of scrap metal weekly. I observed one approximate 20-cubic yard roll-off container of scrap metal located east of the vehicle crusher and shown in Photo 15, Attachment 9. The scrap metal consists of crushed vehicles that have been determined to be non-RCRA hazardous, by virtue of product and process knowledge. The scrap metal is picked up and transported offsite by Alter Metal Recycling-Cedar Rapids (Alter), 6305 11th Street SW, Cedar Rapids, Iowa, for recycling.

Waste Aerosol Cans: Mr. Cassill stated that Sunline generates approximately two RCRA-empty waste aerosol cans weekly. The waste aerosol cans include glass cleaner and similar cleaning products, brake cleaner, penetrating oil, and spray paint. Mr. Cassill stated that the waste aerosol cans have been determined to be RCRA-empty, non-RCRA hazardous by virtue of process knowledge, and are currently disposed in general trash. He added that any aerosol cans that are not empty are transported to the Cedar Rapids/Linn County Regional

Solid Waste Agency where they are managed as D001 characteristic hazardous waste. I did not observe any waste aerosol cans being generated during this inspection. I provided compliance assistance regarding management of waste aerosol cans during my exit briefing.

Used Oil: Mr. Cassill stated that Sunline generates approximately 300 gallons of used oil annually. The used oil is collected in the Processing Building from salvaged vehicles. The used oil is stored in approximate 275-gallon intermediate bulk container (IBC) totes. The used oil is picked up and transported off site by Northland Company (Northland), 1000 Rainbow Drive, Waterloo, Iowa, for recycling. *Additional discussion of used oil management is in Section 4.4.*

Used Oil Absorbents: Mr. Cassill stated that Sunline generates approximately one 55-gallon container of used oil absorbents annually. The used oil absorbents are managed as used oil and are picked up and transported off-site by Northland for recycling. I observed absorbents being generated to absorb fluids spilled on the floor of the Processing Building during my visual inspection.

Waste Antifreeze: Mr. Cassill stated that Sunline generates approximately one 275-gallon IBC tote of waste antifreeze every two years. Mr. Cassill stated that the waste antifreeze is non-RCRA hazardous, by virtue of product and process knowledge. He added, however, that Sunline elected to have the waste antifreeze picked up and transported offsite by Northland for recycling.

Waste Fuel: Mr. Cassill stated that Sunline removes approximately 20-60 gallons of waste fuel from salvaged vehicles generated in the Processing Building. The waste fuel is removed from vehicles and transported to a large 500-gallon above ground storage tank located outside the Processing Building. The waste fuel is used onsite to power automotive yard vehicles.

Spent Lead-Acid Batteries: Mr. Cassill stated that Sunline generates approximately one pallet totaling between 30-40 spent lead-acid batteries every two weeks. The spent lead-acid batteries are picked up and transported offsite by Alter for reclamation. The spent lead-acid batteries are sent offsite for reclamation in accordance with 40 CFR Part 266, Subpart G.

Universal Waste-Mercury Containing Equipment: Mr. Cassill stated that Sunline generates approximately one half-full five-gallon container of switches containing mercury annually. The automotive convenience light switches containing mercury are removed from processed vehicles and are managed as universal waste-mercury containing equipment. The switches are collected in a labeled, five-gallon container that is dated when the first switch is placed into the container. The Iowa Mercury Switch Program pays a bounty for the switches and the switches are transported on a pre-paid basis to the End-of-Life Vehicle Solutions Corporation for recycling.

Salvaged/Spent Vehicle Airbags: Mr. Cassill stated that Sunline does not remove airbags from salvaged vehicles and the airbags are crushed with the vehicle bodies and managed as scrap metal. Mr. Cassill estimated that Sunline generates between 400-600 salvaged/spent

vehicle airbags annually.

General Trash: Mr. Cassill stated that Sunline generates approximately nine cubic yards of general trash weekly. The general trash consists of waste office paper, lunch wastes, and miscellaneous cardboard and packing materials. Mr. Cassill stated that the general trash has been determined to be non-RCRA hazardous, by virtue of product and process knowledge. The general trash is picked up by ABC Disposal Systems, Inc. (ABC), 113 Reynolds Place, Hiawatha Iowa, and transported off-site to the Cedar Rapids/Linn County Solid Waste Agency, 1954 County Home Road, Marion, Iowa, for sanitary landfill disposal.

4.4 Visual Inspection of Facility Waste Stream Management

I observed two pallets of spent lead-acid batteries located outside the Processing Building (Photo 1, Attachment 9). Mr. Ackerman explained that one pallet supporting approximately 40 spent lead-acid batteries was staged for pick up by Alter; the other pallet was used to collect lead-acid batteries for another shipment offsite to Alter. Mr. Ackerman added that Sunline had purchased two large plastic tubs that were intended to be placed beneath the wooden pallets supporting the spent lead-acid batteries. He stated that the tubs would be placed beneath the next set of wooden pallets used to support the spent lead-acid batteries.

I observed a battery testing and charging station located inside the Processing Building pictured in Photo 2, Attachment 9. I did not observe any environmental issues or concerns.

I observed an approximate 30-gallon parts washer shown in Photo 3, Attachment 9. I did not observe any environmental issues or concerns.

I observed a container used to collect fuel from salvaged vehicles and a container used to collect used oil from salvaged vehicles located inside the Processing Building, shown in Photo 4, Attachment 9. The container used to collect used oil from vehicles was marked with the words "Used Oil" as prescribed by 40 CFR §279.22(c)(1). I did not observe any environmental issues or concerns.

I observed spilled or leaked fluids on the floor of the Processing Building, shown in Photo 5, Attachment 9. I asked Mr. Ackerman the nature of the spills, to which he responded that the fluids were "likely used oil or antifreeze" and he immediately summoned an employee to apply absorbent pads to absorb the leaked/spilled fluids, as shown in Photos 6 and 7, Attachment 9.

I observed a full, unlabeled, approximate 275-gallon IBC tote of fluid located outside the Processing Building, shown in Photo 8, Attachment 9. I asked Mr. Ackerman what was in the tote, to which he replied, "Used Oil." I informed Mr. Ackerman that **Sunline must label containers of used oil with the words "Used Oil" in accordance with 40 CFR §279.22(c)(1), NOPF No. 1 (Attachment 5).** Mr. Ackerman immediately applied the words "Used Oil" to the exterior of the IBC tote using spray paint as shown in Photo 9, Attachment 9.

I observed a partially filled (less than ¼-full), unlabeled, approximate 275-gallon IBC tote of fluid located adjacent to the vehicle crusher, shown in Photo 11, Attachment 9. I asked Mr. Ackerman what was in the tote, to which he replied, “Used Oil.” I informed Mr. Ackerman that **Sunline must label containers of used oil with the words “Used Oil” in accordance with 40 CFR §279.22(c)(1), NOPF No. 1 (Attachment 5).** Mr. Ackerman immediately applied the words “Used Oil” to the exterior of the IBC tote using spray paint as shown in Photo 12, Attachment 9.

I observed an approximate 12-foot square area beneath the car crushing unit that appeared to be discolored and cast a sheen on standing water (Photo 10, Attachment 9). I asked Mr. Ackerman if he knew the nature and source of the discoloration. He responded by stating that the vehicle crushing unit had experienced a hydraulic hose leak and hydraulic fluid had leaked onto the concrete pad located beneath the car crushing unit. He stated that the leaking hydraulic hose had been repaired immediately the week before this inspection. **Sunline must immediately clean up and manage used oil and other materials upon detection of a release in accordance with 40 CFR §279.22(d)(3), NOPF No. 2 (Attachment 5).**

I observed a vehicle being staged for crushing in front of the vehicle crushing unit shown in Photo 13, Attachment 9. I observed a large mound of vehicles staged for crushing shown in Photo 14, Attachment 9. I observed an approximate 20-cubic yard roll-off container of scrap metal shown in Photo 15, Attachment 9. I did not observe any environmental issues or concerns.

No other environmental issues or areas of concern were observed during this visual examination.

4.5 Documentation

Prior to this CEI, I determined that there were no electronic uniform hazardous waste manifests generated by Sunline, spanning the period of January 1, 2019, thru November 1, 2022.

5.0 SUMMARY

I documented the following preliminary findings during this CEI:

NOPF No. 1: 40 CFR § 279.22(c)(1): Failure to label two containers with the words “Used Oil” (NOPF No. 1, Attachment 5).

NOPF No. 2: 40 CFR §279.22(d)(3): Failure to clean up and manage used oil and other materials beneath the car crushing unit.

Other than the items specifically noted in this narrative, I observed no additional issues or

potential findings. However, further EPA review may change or add to my findings.

HURLEY BRYANT
(Affiliate)

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Date: 12/07/2022

H. D. "Doug" Bryant, CPP, PCI
Civil Investigator, SEE

AMBER WHISNANT

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Date: _____

Amber Whisnant
Chief, RCRA Section, Chemical Branch
Enforcement and Compliance Assurance Division

Attachments:

- 1) Business Card (1 page)
- 2) Site Map/Diagram (1 page)
- 3) Confidentiality Notice (1 page)
- 4) Receipt of Document and Samples (1 page)
- 5) Notice of Preliminary Findings (2 pages)
- 6) Hazardous Waste Site Info Verification Report for Inspector (1 page)
- 7) Norsolv Environmental Services Manifest No. MITCHELL-3352549176, Sales Order No: NSV0005724 (2 pages)
- 8) Northland Norsolv Safety Data Sheet, Northland NORSOLV (11 pages)
- 9) Photo Log and Photos (17 pages)