REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

ARNOLD MOTOR SUPPLY
120 South Walnut
Ames, IA 50010
515-222-2520

EPA ID Number: IAD042192005

On

December 15-16, 2021

By

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Enforcement and Compliance Assurance Division

1.0 INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division (ECAD), I performed a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at the Arnold Motor Supply in Ames, Iowa. The inspection was conducted on December 15-16, 2021. The CEI was conducted under the authority of RCRA Section 3007(a), as amended. During the inspection, I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. This report and attachments present the results of the CEI. Based on the information obtained during the inspection, I inspected Arnold Motor Supply as a very small quantity generator (VSQG) of known hazardous waste (HW), and a small quantity handler of universal waste (SQHUW) lamps. Arnold Motor Supply is also a do-it-yourself (DIY) used oil collection center and a used oil marketer. According to the U.S. Environmental Protection Agency (EPA) RCRAInfo database, the facility had been previously inspected by the EPA on December 4-5, 2007.

2.0 PARTICIPANTS

Arnold Motor Supply:

Gary Kemp, Store Manager (27 years with Arnold Motors, 4 months Manager in Ames)
Tylor Pratt, Counter Clerk (12 years)
Mark Swanson, Machinist (22 years)

EPA:

Mark Holcomb, Civil Investigator (NOWCC/SEE) (Lead Inspector)
Dedriel Gardner, Environmental Scientist/Inspector (Training Preceptor)

3.0 INSPECTION PROCEDURES

On December 15, 2021, Ms. Dedriel Gardner and I arrived unannounced at the facility's main store entrance at about 0900 hours. At the store counter I asked one of the store clerks for Mr. Duane Bates, who is listed on the RCRAInfo Site Verification Report as the Site Contact and Safety Officer. The store clerk informed me that Mr. Bates was not available and that he worked out of the company's Spencer, Iowa store about three hours away and suggested that I talk to their store manager, Mr. Gary Kemp. Mr. Kemp invited us into his office. We introduced ourselves. Mr. Kemp told us there were no specific COVID-19 or safety personal protective equipment (PPE) requirements at this store. He offered us an office next to his to use as our staging point for the day.

At the opening conference, I introduced myself and presented my EPA ID. I also introduced my colleague Ms. Gardner. I explained that I was the lead but also in training and that Ms. Gardner was my trainer and our credentialed inspector. Ms. Gardner presented her credentials. I explained the purpose and procedures of the inspection. I presented Mr. Kemp with a copy of RCRA Section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented them with a copy of Title 18 U.S. Code, Sections 1001 and 1002. I made him aware of their confidentiality rights and informed him that a Confidentiality Notice would be provided at the end of the inspection to make a confidentiality claim if they so desired.

The RCRA inspection consisted of a discussion of facility operations, waste generation, and waste management; a visual inspection of active waste generation and management areas; and a review of waste management records. During the visual inspection, Mr. Kemp was present throughout the inspection. Mr. Kemp was the only Arnold Motor Supply employee present for the opening and was with me during the visual inspection. I met other employees in their respective areas. These additional employees were introduced by Mr. Kemp to answer my questions and/or escort us through their respective areas. Mr. Kemp stated that he had been with Arnold Motors Supply for over 27 years, as a manager of another Arnold Motor Supply store and a manager of this store (in Ames) for about four months. This Arnold Motor Supply facility in Ames is only one building (approximately 8000 square feet) with parking on both sides and the rear of the store (see Attachments #1 and #2 for the facility aerial view and map location). I did not obtain a facility diagram as one was not available.

I conducted a visual inspection of the following:

- Machine Shop-East
- Outside (East Side) of the building near loading dock
- Freight Receiving Room
- Machine Shop-West
- Machine Shop-East
- Paint Shop

Document Photocopies and Photographs were collected as inspection documentation (see Attachments #1-21 and Photos 1-26). The photo log is included (see Attachment #3). Information collected during the inspection is documented on an Entry/Exit checklist and

hazardous waste compliance checklists. I reviewed documents including the following: Safety Data Sheets (SDS); bill of lading; emergency plans; waste profiles; and manifests.

On the morning of December 16, 2021, at the conclusion of the inspection, I held a closing conference. Participants included Mr. Kemp, and Ms. Gardner. I provided Mr. Kemp with a Receipt for Documents (see Attachment #4) and a Confidentiality Notice (CBI) (see Attachment #5) which he signed as acknowledgement of receipt. No confidential business information (CBI) claims were made. I summarized my findings and recommendations and provided Mr. Kemp with a Notice of Preliminary Findings (NOPF), which he signed to acknowledge receipt (see Attachment #6). I provided inspection and compliance assistance documents during the inspection, some as paper versions and some in electronic PDF via email, that included the following:

- RCRA Section 3007(a)
- Title 18 U.S. Code, Sections 1001 and 1002
- Confidentiality Notice (Top page of the completed carbonless transfer set)
- Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA In Connection with Inspections Receipt for Documents and Samples
- Notice of Preliminary Findings (NOPF) with Instructions for Responding on back of form (top page of the completed carbonless transfer set)
- Instructions for Responding to a Notice of Preliminary Finding (NOPF) (EPA Handout)
- U.S. EPA Small Business Resource Information Sheet (EPA Handout)
- Solvent-Contaminated Wipes Final Rule Chart (EPA Handout)
- Recycling Electronics (IDNR Handout)
- Lead-Based Paint Activities (IDNR Handout)
- Excluded Solvent-Contaminated Wipe Rule (IDNR Handout)
- Battery Recycling/Disposal (IDNR Handout)
- Management of Fluorescent Lamps for Businesses (IDNR Handout)
- Incompatible Chemicals (IDNR Handout)
- Universal Wastes Including Aerosol Cans (IDNR Handout)
- TCLP Waste Determination Testing (IDNR Handout)
- Industry Sector Notebooks (EPA Handout)
- Environmental Compliance Assistance Centers (EPA Handout)
- e-Manifest Fact Sheet (EPA Handout)
- RCRA Online A Quick Reference Guide (EPA Handout)
- Requirements for Used Oil Management Standards (EPA Handout)
- Emergency Response Program (EPA Handout)
- Commercial Motor Vehicle Transportation System Security & Safety
- Security Awareness (EPA Handout)
- Chemical Facility Anti-Terrorism Standards (Homeland Security Handout)
- Iowa Life/Changing Iowa Department of Economic Development – Iowa Environmental Guide for Business

I followed the inspection procedures detailed in the RCRA CEI Standard Operating Procedure (SOP) 2321.1, unless noted otherwise.

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

Mr. Kemp stated that this Arnold Motor Supply facility at this location began operations in 1969. The Arnold Motor Supply store employs approximately 13.5 staff mostly working Monday-Saturday day shift. The Arnold Motors Supply Corporate office is in Spencer, Iowa. In addition to stores in Iowa, Arnold Motor Supply has stores in Nebraska, Minnesota, Missouri, and Illinois for a total of 59 stores. Arnold Motor Supply is primarily an automotive parts and supply store along with an attached machine shop for rebuilding engines (includes parts washers for both aluminum and cast-iron parts), a paint shop that mixes custom color paints in aerosol cans (mixing/blending paint ingredients that are added into aerosol cans that are then pressurized), and a Do-It-Yourself (DIY) used oil collection service area. Raw materials used include parts washer cleaner detergents, paint, shop rags, solvents, spent batteries, and used oil.

4.2 Facility RCRA Status

Arnold Motor Supply-Ames was last inspected for RCRA compliance on December 4-5, 2007, by the EPA. Primary findings from that inspection were:

- Failure to make a waste determination before disposal of universal waste lamps
- Failure to label used oil storage drums
- Initiated a shipment of used oil through a transporter without an EPA number
- Initiated a shipment of used oil to a facility that burns it in a device not listed in 40 CFR 279.61
- Failure to maintain records of used oil shipments
- Failure to obtain a one-time certificate from burner
- Failure to notify EPA of facilities status as a used oil marketer

According to the RCRAInfo Waste Site Info Verification form, Arnold Motor Supply notified as a Small Quantity Generator (SQG) of D001, D002, D005, D007, D008, and D018 hazardous wastes on April 2, 2013. I provided Mr. Kemp with the Site Info Verification form, which he reviewed and returned with no changes (see Attachment #7). At the time of the inspection, based on the facility's hazardous waste generation rate (less than 220 pounds of non-acute hazardous waste generated per month), I determined Arnold Motor Supply to be an VSQG of hazardous waste, even though they had previously reported as a SQG. Note: since this facility initially reported as SQG, I started the inspection as a SQG and then switched to VSQG once I calculated their monthly volumes. Additionally, on several occasions I provided compliance assistance by mentioning the related SQG requirements as best practices and/or in case they bump up to SQG in the future. In addition, I determined Arnold Motor Supply to be a SQHUW of lamps and a used oil marketer (used oil from DIY sources only). Since they are functioning as a VSQG, their records tend to be minimal. The safety director at the corporate home store, Duane Bates, provided the attached email regarding hazardous waste shipment records (see Attachment #8) stating that the Ames, Iowa store had not shipped any hazardous waste in 2021, with the last shipment being in June 2020.

4.3 Facility Waste Streams and Management

The following waste streams are managed by Arnold Motor Supply:

Parts Washers, and Machining Unit Residue/Sediment – The parts washers waste and some machining unit wastes are combined into one waste stream. It includes sediment/liquid from two parts washers and from several machining units (for example grinders). Arnold Motor Supply has two large industrial parts washers, including a PMW (Precision Metal Works), that are large enough for an engine block. Mr. Kemp stated one is designed for aluminum parts and one is for cast iron parts. Both are aqueous parts washers that use a detergent (mildly caustic) instead of a hydrocarbon solvent, that reportedly gives you all the cleaning power of a solvent parts washer but uses cleaning solutions that are safe and biodegradable.

Their red "Low Heat" aqueous parts washer is seen in Photo 1. Photo 2 shows an empty container of the detergent cleaner used in the Low Heat parts cleaner. Attachment #9 is an original Material Safety Data Sheets (MSDS) for the Low Heat detergent cleaner and Attachments #11 and #12 are newer Safety Data Sheets (SDS) for the Low Heat detergent cleaner. For more details and the Tech Info on the Low Heat Cleaner from BASF Chemetall, see Attachment #17.

Their blue "Little Jet" aqueous parts washer is seen in Photo 3. See Photo 6 for an example of an empty container of the detergent used with this parts washer. See Attachment #10 for the MSDS of the Oakite Super Turbo-Det also used with the Little Jet aqueous parts washer.

Both large parts washers can be seen in the attached photos taken in the Machine Shop East (see Photos 1, 3, and 5). Photo 5 shows a view of both parts washers and the rinse basin located between them that discharges to a floor drain (discussed in more detail below). The machinist, Mr. Swanson, stated that both large parts washers, as well as the floor drain, had a sludge/sediment filter that needed to be periodically cleaned out. The sludge/sediment cleanout is collected in a black 55-gallon steel drum located next to the low heat parts washer and is labeled as hazardous waste. The drum appeared to be in good condition and was an estimated 1/3 full. It was not labeled to identify the nature of the hazardous waste, but this is not required for a VSQG. I also observed that the drum lid was in place and not secured tightly, but this is also not required for a VSQG (see Photos 18 and 19).

As an example of the grinder residue/sediment that is accumulated with the parts washer waste, Arnold Motor Supply has a Van Norman Flywheel grinder that uses water to cool the grinder and part as it is being machined (see Photo 4). Mr. Swanson stated that the sediment from this grinder was added to the same above hazardous waste 55-gallon drum and that this added to less than one drum worth of volume approximately every two years.

Mr. Kemp estimated from his notes, that they had shipped this combined waste stream of parts washer wastes and grinder sediment only twice in the last four years. He stated that in December 2017 they shipped 400 lbs (see Attachment #15 for Manifest and Waste Profile), and in June 2020 they shipped 500 lbs (see Attachment #14 for the Bill of Lading and Heritage shipping documents). I estimated that since it had been about 18 months since the last shipment in June

2020, and they have accumulated about 167 lbs (1/3 of a 500 lb drum) onsite during the last 18 months, this would average to about 9.3 lbs per month for this routinely generated waste stream. It was last shipped as UN1160 Waste Corrosive Liquids with hazardous waste codes D005 (Barium), D007 (Chromium), and D008 (Lead) based on product and process knowledge (previously also included D002 for corrosivity). The hazardous waste determination is for the combined waste stream. However, Mr. Kemp stated that all their individual machine units are used to machine the same type of metals as cleaned in the parts washers and therefore would have similar individual hazardous waste determinations based on product and process knowledge. It should be noted that the parts washer's SDS and MSDS in Attachments #9, #10 and #12 state they contain trade secrets. However, the MSDS and SDS state that the unidentified ingredients are considered not hazardous under Federal Hazard Communication Standard (29 CFR 1910.1200). This combined waste is picked up by Heritage and transported to the Heritage Crystal Kleen facility in Des Moines, Iowa for incineration. For the generator certification and service agreement with Heritage-Crystal Clean see Attachment #16.

Floor Drain Liquid/Sediment – Mr. Swanson stated that when parts come out of the parts washers, they were typically rinsed off with water in the rinse basin, which drained to the floor drain (see Photo 7). He stated that the floor sludge/sediment filter only required cleanout about once every 20 years, and the last cleanout he recalled was back in 2005 and generated four drums of sediment. Mr. Swanson stated that after the last EPA inspection in 2007, there were some questions about where the floor drain drained to and if this was an issue or not. He stated that the City of Ames, Iowa, in January 2008, came out and inspected the drain and tested the out-flow liquid from the rinse basin, and made the following determinations: *"During that inspection, city employees verified the solids settling basin overflow does drain to the sanitary sewer system."* The City also stated: *"Upon review of the chemicals used and the results of the pH sample, the City determined that Arnold Motor Supply will not need a permit for discharge at this time."* The results of the pH sample was 9.3. See Attachment #13 (obtained from the EPA facility file) for the letter and test results.

Waste Paint and Paint Related Items – Arnold Motor Supply generates an estimated 10-15 lbs of waste paint per month. This estimate is based on the last shipment of a full drum at 400 lbs on September 18, 2019 (27 months ago), and since then they generated ¾ of a 55-gallon drum (estimated at 300 lbs), for an approximately 11.1 lbs per month. This waste stream is typically from miss-matches in their custom automotive paint mixing and aerosol paint can filling process. They determined this waste to be a F003, F005, D001, and D035 hazardous waste based on product and process knowledge. Their last shipment of this waste stream on September 18, 2019, was picked up by Heritage and transported to Heritage-Crystal Clean in Des Moines, Iowa, for incineration (see Attachment #18). In their Paint Room, I observed two black 55-gallon steel drums (see Photos 24-26). One drum was empty. The drum in use was about ¾ full and was currently being filled from a paint can via a funnel with an attached lid. The drum appeared to be in good condition and was labeled with both a Hazardous Waste label and nature of the hazard.

Oil and Solvent Contaminated Shop Rags - Arnold Motor Supply uses approximately 20 cloth shop rags every two weeks as stated by Mr. Swanson (Machinist). The shop rags are used to wipe down parts with solvents. Solvents used includes: Parts Master–Non-Chlorinated Brake and Parts Cleaner, Auto Body Master Professional Lacquer Thinner, and Mistic Metal Mover (see

Photos 17, and 21-23). See Attachment #21 for the thinner's SDS. The contaminated rags are accumulated onsite in a 10-gallon step can (see Photo 14). The step can appears to be in good condition and is about 1/3 full of dry rags. The step can appears to only have the generic "empty every night" label but was securely closed. Arnold Motor Supply has a rental and service agreement with A&M Services in Spenser, Iowa for laundering that includes pickup and delivery every two to three weeks (see Attachments #19 and 20). I asked Mr. Kemp if they had done a hazardous waste determination on the rags since they use several different solvents. Mr. Kemp stated they had not.

- **Make a hazardous waste determination on shop rags as required in 40 CFR 262.11: NOPF 1B**

Waste Batteries – Arnold Motor Supply generates approximately 60-70 batteries, or one pallet worth every two to three weeks. These spent batteries are typically trade-ins from new battery purchases. The used automotive battery cores are managed as 266 Subpart G. The batteries are stored onsite in the Freight Receiving Room next to Machine Shop East in a plastic lined cardboard container (see Photo 10). Approximately every two to three weeks they are sent to their home store in Spencer, Iowa and then sent to East Penn Manufacturing (maker of Deka Series batteries) in Corydon, Iowa, for recycling.

Used Oil – Arnold Motor Supply generates an estimated two 55-gallon drums of used oil per year according to Mr. Kemp. The latest shipment was about four to six weeks ago. Mr. Kemp stated that he was unable to locate any shipping records for the used oil. All of the used oil is generated from Do-It-Yourself (DIY) drop-offs, as a service to customers. I observed two steel black 55-gallon drums in the Freight Receiving Room. Both drums appeared to be in good condition. One drum was empty, the in-use drum was about 2/3 full with a funnel in the bung (see Photo 11 and 13). Both drums were labeled with "Used Oil". Mr. Kemp stated that full drums of used oil are shipped directly to a company called Hab Hab in Ames, Iowa, that "burns the used oil in their onsite space heater" which would make Arnold Motor Supply a used oil marketer.

- **Only ship off-spec oil to a burner who has an EPA ID number as required in 40 CFR 297.71: NOPF 2**

- **Failure to notify EPA of status as a used oil marketer as required in 40 CFR 279.73: NOPF 3**

- **Must maintain record of each shipment of off-spec used oil that includes: the name and address of the 1) transporter, 2) burner, 3) EPA number of the transporter and burner, 4) quantity and date of shipment as required in 40 CFR 279.74: NOPF 4**

- **Prior to sending first shipment of off-spec oil, must obtain from the burner a one-time written and signed notice certifying the burner has notified the EPA of used oil management activities and must maintain records for at least 3 years as required in 40 CFR 279.75: NOPF 5**

Spent Universal Waste Lamps – Arnold Motor Supply generates around one to two boxes of spent lamps per year. Mr. Kemp stated that he was not aware if there had been a hazardous waste

determination on the spent lamps. Mr. Pratt stated that there were currently no spent lamps stored at this facility and he was not aware how they were processed or shipped, or if they just end up in the trash.

- **Make a hazardous waste determination on spent lamps (when generated) as required in 40 CFR 262.11: NOPF 1A**

General Trash – Arnold Motor Supply generates approximately one two-yard dumpster of general trash twice a week from general facility operations (see Photos 8 and 9). The general trash is picked up by Aspen Waste Systems and hauled to Resource Recovery Plant in Ames, Iowa and burned for energy.

I observed in a trash can in the Machine Shop area (see Photo 16), what appeared to be one disposable wipe that appeared to be contaminated with oil. Mr. Swanson (machinist) told me that they do not use disposable wipes in the machine shop and that they only use reusable cloth rags. Mr. Swanson stated that this wipe had most likely been brought in by a customer and left with dirty used part that had been brought in to be worked on.

Paper and Cardboard – Arnold Motor Supply generates general office recyclables such as paper and cardboard from office/store operations. The recyclables are places in a gray, green top, plastic 80-gallon recycle bin near the freight receiving dock, which is picked up weekly by Chitty Recycling and transported to Nevada, Iowa for recycling (see Photo 12). The recycle bin was in good condition and approximately 1/3 full.

Scrap Metal - Arnold Motor Supply generates an unspecified "minimal amount" per Mr. Kemp, of scrap metal, mostly from useable old parts and metal from grinding. They currently had less than a ¼ full 55-gallon drum of scrap metal. Mr. Kemp stated that the scrap metal is sold to a "private party" for recycling.

Blast Cabinet Residue - Arnold Motor Supply has a blast cabinet in the Machine Shop East that uses glass beads to blast clean aluminum engine heads. Mr. Kemp stated that the machine is cleaned out daily and he estimates it generates less than a 5-gallon bucket of residue per year. Mr. Kemp stated there has not been a hazardous waste determination made on this waste and that it is currently placed in the general trash can.

- **Make a hazardous waste determination on blast cabinet residue as required in 40 CFR 262.11: NOPF 1D**

Mechanic Shop Residue (Belt Surface Grinder) – Arnold Motor Supply has a belt surfacer grinder that they use for machining parts (see Photo 20). Mr. Kemp stated that they are used for primarily iron parts. The generation rate is small, and Mr. Swanson estimated it to be about "a dustpan full or 1 quart per month". The residue initially accumulates on the floor and is then swept up and placed in the general trash or if it appears to be mostly metal it will be placed in the scrap metal recycle drum. I asked Mr. Kemp if they had made a hazardous waste determination on this residue and he stated that they had not, and it would be needed.

- **Make a hazardous waste determination on machine shop residue as required in 40 CFR 262.11: NOPF 1C**

4.4 Other Regulatory Requirements

Outside Facility Perimeter - I inspected the outside perimeter of the facility and observed no hazardous waste storage tanks, containers, or other stored waste other than the one two-yard size trash bin noted above and a single propane tank cage (see Photo 8).

CAA – This facility does not have a designated Central Accumulation Area (CAA).

Preparedness and Prevention - Mr. Kemp stated Arnold Motor Supply has an emergency plan. There were fire extinguishers, spill kit, and eye wash stations present. See Photo 15 for an example of their emergency information posted in the Machine Shop West.

Personnel Training - I asked Mr. Swanson to describe the training for Arnold Motor Supply employees with hazardous waste or universal waste handling responsibility and he stated that his training had been all On-the-Job-Training (OJT). However, hazardous waste related training is not required for VSQG.

Oil Spill – I observed what appeared to be a minor oil leak, or oil spatter, from an air compressor in Freight Receiving Room next to Machine Shop East (see Photo 13). The spill appeared to be mostly dry with no active leak noted and about one to two feet in diameter. There is no oil staining towards the floor drain in this room. The used oil drums are stored about three feet from this location and the oil drums appear to be in good condition with no leaks or oil leak stains emanating from the drums. Mr. Kemp stated that this oil stain had been there as long as he could recall and felt it was probably light splatter from an older air compressor.

5.0 SUMMARY OF FINDINGS

NOPF 1: Make a hazardous waste determination on the following as required in 40 CFR 262.11:

- **A) Spent lamps (when generated)**
- **B) Shop rags**
- **C) Mechanic Shop residue put in trash**
- **D) Machine Shop East – Blast Cabinet residue**

NOPF 2: Only ship off-spec oil to a burner who has an EPA ID number as required in 40 CFR 297.71

NOPF 3: Failure to notify EPA of status as a used oil marketer as required in 40 CFR 279.73

NOPF 4: Must maintain record of each shipment of off-spec used oil that includes: the name and address of the 1) transporter, 2) burner, 3) EPA number of the transporter and burner, 4) quantity and date of shipment as required in 40 CFR 279.74

<u>NOPF 5</u>: Prior to sending first shipment of off-spec oil, must obtain from the burner a one-time written and signed notice certifying the burner has notified the EPA of used oil management activities and must maintain records for at least 3 years as required in 40 CFR 279.75

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.

MARK HOLCOMB (Affiliate)
Digitally signed by MARK HOLCOMB (Affiliate)
Date: 2022.02.02 13:47:18 -06'00'

Mark Holcomb
Civil Investigator

AMBER WHISNANT
Digitally signed by AMBER WHISNANT
Date: 2022.02.07 22:14:02 -06'00'

Amber Whisnant
RCRA Section Chief, ECAD/CB

Attachments:

1. Facility Aerial Photo (1 page)
2. Facility Aerial Map View (1 pages)
3. Photo log (13 pages / 26 photos)
4. Receipt for Documents (1 page)
5. Confidentiality Notice (l page)
6. Notice of Preliminary Findings NOPF (2 pages)
7. EPA RCRA Hazardous Waste Site Info Verification Report (1 page)
8. Email from Arnold Safety Director (1 page)
9. MSDS Oakite Low Heat Cleaner (2 pages)
10. MSDS Oakite Super Turbo Detergent (4 pages)
11. SDS Low Heat Cleaner (11 pages)
12. SDS Update Low Heat Cleaner (6 pages)
13. Ames City POTW Approval Letter (2 pages)
14. Bill of Lading – Waste Corrosive Liquid Jun 2020 (4 pages)
15. Waste Profile and December 2017 Manifest Waste Corrosive Liquid (2 pages)
16. Service Agreement with Heritage Crystal Clean (2 pages)
17. Tech Info Low Heat Detergent (3 pages)
18. Bill of Lading – Waste Paint (2 pages)
19. Invoice- Shop Rags (1 page)
20. Rental Agreement- Shop Rags (1 page)
21. SDS- Prime Grade Thinner (17 pages)

Notice of Preliminary Findings

(For Contractor Use Only)

Facility Name: Arnold Motor Supply

Facility Address: 120 S. Walnut
Ames, IA 50010

EPA ID#: IAD 042192005 **Date:** 12/15/2021

Notice: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for the EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to the EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and will make determinations as to what violations may have occurred at your facility.

Citation	Description of Finding
(1) 40 CFR 262.11	Make a hazardous waste determination on the following: A) Spent Lamps (when generated) B) Shop Rags C) Mechanic Shop Residue put in trash D) Machine Shop (East) Blast Cabinet
(2) 40 CFR 279.71	Only ship off-spec used oil to a burner who has an EPA ID number
(3) 40 CFR 279.73	Failure to notify EPA of status as a used oil marketer

If you have any questions about this Notice or wish to discuss your response, you may call me at 913-551-7310, or Kevin Snowden (Compliance Officer) at 913-551-7020.

This Notice prepared by Mark Holcomb Date: 12/15/2021

The undersigned person hereby acknowledges receipt of this Notice and has read the same.

Printed Name: GARY KEMP Date: 12-16-21

Signature: Gary Kemp

Title: Store Manager

(Rev: 2/25/2020) White Original/ EPA • Yellow/ Facility

Notice of Preliminary Findings (Continued)
Media: _____

Facility Name: Arnold Motor Supply
Facility Address: 120 S, Walnut
Ames, IA 50010
EPA ID#: IAD042192005 **Date:** 12/15/2021

Citation	Description of Finding
(4) 40 CFR 279.74	Must maintain record of each shipment of off-spec used oil that includes: name address of the 1) transporter and 2) burner, EPA ID number of the transporter and burner Quantity & date of shipment
(5) 40 CFR 279.75	Prior to sending 1st shipment of off-spec oil, must obtain from the burner a one-time written and signed notice certifying the burner has notified the EPA of used oil management activity Must maintain records X 3 yrs

Initials of Recipient: AHK Date: 12-16-2021
Initials of Preparer: MH Date: 12/15/2021

(Rev: 2/25/2020) White Original/ EPA Yellow/ Facility