

REPORT OF COMPLIANCE EVALUATION INSPECTION
(INDUSTRIAL STORMWATER)

Sun Line, Inc.
4000 6th Street SW
Cedar Rapids, Iowa 52404

NPDES General Permit No. 1: **IA0018-0012**

BY
U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 7
ENFORCEMENT AND COMPLIANCE ASSURANCE DIVISION (ECAD)
WATER BRANCH/DRINKING WATER & INSPECTIONS SECTION (WB/DWIS)

ON
OCTOBER 3, 2022

INTRODUCTION

At the request of the Water Branch (WB), Enforcement and Compliance Assurance Division (ECAD), a Compliance Evaluation Inspection (Industrial Stormwater) was conducted on October 3, 2022, at the Sun Line, Inc. yard located at 4000 6th Street SW in Cedar Rapids, Iowa. The inspection was conducted under the authority of Section 308 of the Clean Water Act, as amended. It was conducted in accordance with the U.S. Environmental Protection Agency (EPA) Region 7 Standard Operating Procedures for Compliance Inspections (ENST SOP No. 2332). This narrative report presents the findings of the inspection. Mr. Christopher Gelner with the Iowa Department of Natural Resources Field Office 1, and Ms. Cara Matteson with the City of Cedar Rapids Stormwater Program were present during the inspection.

PARTICIPANTS

Sun Line, Inc.

- Jay Cassill, Owner
- Nick Ackerman, Yard Manager

Iowa Department of Natural resources, Field Office 1

- Chris Gelner, Environmental Specialist

City of Cedar Rapids - Public Works Department/Stormwater Program

Cara Matteson, Stormwater Program Manager, Public Works Department

U.S. Environmental Protection Agency (EPA), Region 7

- Naji J. Ahmad, Environmental Engineer, ECAD/WB/DWIS

Procedures and Introduction

Ms. Cara Matteson, Mr. Christopher Gelner and I arrived at the Sun Line, Inc. yard located at 4000 6th Street SW in Cedar Rapids, Iowa, at 9:45 A.M. on October 3, 2022. We met with Mr. Nick Ackerman. We introduced ourselves, I presented my credentials, and I explained the purpose and procedures of the industrial stormwater compliance evaluation inspection. These included completing the Region 7 Industrial Stormwater Worksheet, completing the Receipt for Documents and Samples Form and the US EPA Confidentiality Notice, evaluating self-monitoring and stormwater management practices, and conducting a facility walk-through with photographs (Attachment 8).

I provided Mr. Ackerman with the U.S. EPA Small Business Resources Information Sheet and the U.S. EPA Confidentiality Notice. After a brief description of the site operations, Mr. Ackerman provided us with the Stormwater Pollution Prevention Plan (SWPPP) binder that included a 2013 SWPPP document, the 2018-2022 SWPPP documents (Attachment 3) and monitoring records (Attachment 4).

Soon after, Mr. Ackerman escorted Ms. Matteson, Mr. Gelner and me on a visual inspection of the facility.

During my visual inspection of the facility, I observed the indoor vehicle-fluid-draining process area, above ground storage tanks and unlabeled totes containing used engine oil and other petroleum products, engine blocks and transmissions stored on shelves, on the rim and off-the-rim piles of tires stored outdoors, the balling process area, significant ground discoloration, especially within the vicinity of the baler and the 55-gallon drums and totes storage areas. In addition, we observed the detention pond which is the only stormwater structural control on site. Finally, I inspected a stormwater inlet and its two 4-inch outlet pipes that discharge to the Road ditch located within the Cedar Rapids Municipal Separate Storm Sewer System (MS4).

After the facility walkthrough, I informed Mr. Ackerman that I will return later in the afternoon, to hold the formal exit meeting, complete the required inspection forms, and issue a Notice of Preliminary Findings (NOPF).

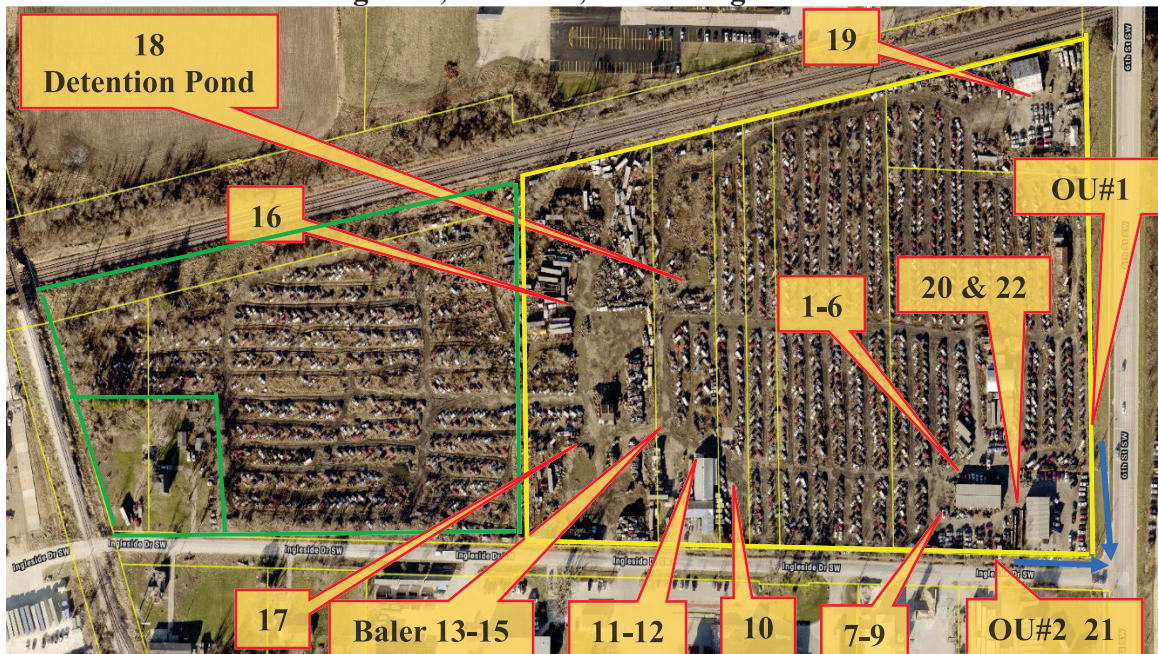
Later that afternoon, I returned to the facility. I held a formal exit meeting with Messrs. Jay Cassill and Ackerman. I discussed my preliminary observations of the facility. I completed the Receipt for Documents and Samples Form (Attachment 5). The facility chose not to claim any confidential business information. I issued a NOPF with three observations (Attachment 6). I also informed Mr. Cassill that I would communicate to him deficiencies that I may find upon my return to the office.

Facility Description

Sun Line, Inc. is an automobile service salvage yard located on approximately 35.5 acres of land (figure 1) since the 1980s. The business changed ownership in October 2021. Prior to October 2021, the process yard consisted of all 35.5 acres, except for the 1 ½ acres at the far southwest corner of the property. According to Sun Line personnel, the new owner started clearing the western 10 acres of the yard just west of the balling process area (green area in figure 1) by removing salvaged vehicles and elevating low areas with dirt and crushed concrete. According to an aerial image dated June 9, 2022, the

current process yard consists of 25 acres (yellow area in figure 1). The facility processed 2,580 vehicles in the past three years. There are approximately 1,500 vehicles and over 500 tires stored on site. All fluids are drained on site prior to crushing. Recycling of materials included battery reclaimers, engines, transmissions, and others automobile parts, automobile junkyards, including but not limited to those classified as SIC 5015 (used motor vehicle parts).

Figure 1, Sun Line, Inc. Salvage Yard



According to the Iowa Department of Natural Resources (IDNR) database, Sun Line, inc. is operating under the National Pollutant Discharge Elimination System (NPDES) General Permit No.1 (GP #1) number 0018-0012 that will expire on October 1, 2023. Discharge authorization was originally granted on October 1, 1992.

The facility employs eleven full time employees and operates from 8:00AM to 5:00PM, Monday thru Friday, and Saturdays from 8:00AM to 12:00PM.

Site Drainage Patterns (Figure 1)

Based on the local topography of the site, surface water would generally flow east and southeast. Surface water would discharge from Outfall 01 (41.93742, -91.676317) into the 6th Street SW ditch. Surface runoff would also leave the site through a stormwater inlet at the northwest corner of the office building that has two 4-inch outlet pipes that discharge south into the Ingleside Drive SW ditch (41.93696, -91.67706). Flows from the two ditches would co-mingle at the southwest corner of 6th Street SW and Ingleside Drive SW intersection (41.93697, -91.67648). At this point stormwater runoff would flow south approximately 0.45 mile into Prairie Creek (41.93704, -91.67664). Prairie Creek flows northwest approximately 3.5 miles into the Cedar River (41.93047, -91.67684).

In addition to the site runoff, surface water from a small section of the area surrounding the detention pond, located in the northwest part of the west side of the yard (41.93845, -

91.67979), would flow toward the detention pond. The pond appeared to have no control and no outlet pipe.

Findings and Observations

1. The SWPPP was developed in 2018. The SWPPP was reviewed and updated on February 26, 2019, and signed on March 1, 2019 by the previous owner. The current owner Mr. Cassill did not sign the SWPPP in accordance with Part III.C.2.A. of the NPDES permit. The permit requires that the SWPPP shall be signed in accordance with Part VI.G. (Iowa Administrative Code 567-64.3(8)).
2. Based on my review of records during the inspection, I issued Notice of Preliminary Finding number 1 (NOPF #1) because Sun Line, Inc. failed to implement the SWPPP by not conducting the following:
 - a. Sun Line, Inc. failed to conduct employee training as required by the SWPPP and Part III.C.4.B(8) of the NPDES GP #1 since December 27, 2018.
 - b. Sun Line, Inc. failed to conduct site inspections as required by the SWPPP and Part III.C.4.c of the NPDES GP #1 since December 27, 2018.
 - c. Sun Line failed to monitor its discharge from all outfalls, at least annually as required by Part V.B.12 of the NPDES GP #1.
3. Based on further review of the SWPPP narrative upon my return to the office, I concluded that the SWPPP was inadequate because it does not reflect the site's current operations, especially,
 - a. Since the elimination of the 10 acers in the west part of the original yard.
 - b. The SWPPP narrative only mentioned one outfall as Outfall #1. However, during my visual inspection of the site, I observed two outfalls as described above. It was unknown to facility personnel which outfall location is referenced in the SWPPP as Outfall #1.
 - c. The SWPPP does not include an adequate site map/plan.
 - d. The SWPPP referenced training for new employees only not to all personnel at all levels of responsibility as required by Part III.C.4.B.(8) of the permit. In addition, the SWPPP does not identify periodic frequencies to conduct employee training.
4. I issued NOPF #2 because during our visual inspection of the site, I noticed and pointed out to facility personnel evidence of poor housekeeping practices, improper handling and storing of fluids, and significant ground discoloration throughout the site, especially grounds surrounding the above ground storage tanks, totes, and drums in the vicinity of the vehicles processing building and the vicinity of the baler. I pointed out to facility personnel that the SWPPP and Part III.C.4.B.(4)(5) of the NPDES GP #1 requires good housekeeping practices and spill management.
5. Sun Line facility has an aggregate aboveground storage capacity over 1,320 U.S. gallons of petroleum products (diesel fuel, gasoline, hydraulic fluid, oil, and used oil) stored onsite in various containers such as double-wall tanks, totes, and 55-gallon drums. According to 40 CFR Part 112, §112.3, Sun Line, Inc. must prepare in writing and implement a Spill Prevention Control and Countermeasure (SPCC) plan in

accordance with §112.7 and any other applicable section of this Part.

Therefore, I issued NOPF #3, because Sun Line, Inc. failed to develop and implement a SPCC plan as required by 40 CFR Part 112, §112.3.

Photo 9, significant ground discoloration outside of the vehicle process building



Photo 14, significant ground discoloration in the vicinity of the bale



6. During the inspection I noticed and pointed out to Mr. Ackerman, that one of the site's employees was washing spilled oils/fluids on the shop floor directly beneath the vehicle on the hydraulic lift inside the shop to the outside of the building (photo 2 and

3). I explained to Mr. Ackerman that this is a contaminated water, when it leaves the premises, it will be considered a non-stormwater discharge and that should be managed.

Photo 3, Spilled oils/fluids being washed to the outside



7. Sun Line, Inc. processes more than 250 vehicles annually. Therefore, Part V.B.12 of the NPDES GP #1 requires Sun Line to monitor its discharge from all outfalls, at least annually, for oil and grease, five-day biochemical oxygen demand (BOD5), chemical oxygen demand (COD), total suspended solids (TSS), total Kjeldahl nitrogen (TKN), total phosphorus, and pH.

My review of the monitoring records provided by the City of Cedar Rapids Stormwater Management Program (Attachment 4) indicated that during the last three years, Sun Line, Inc. collected samples from one outfall during the 2018, 2020, and 2021 calendar years but failed to collect sample during 2019 calendar year. Therefore, Sun Line failed to comply with Part V.B.12 of the NPDES GP #1.

Values in mg/L unless otherwise indicated	date sampled	Total Kjeldahl Nitrogen	Total Phosphorus	Total Suspended Solids	Nitrate Nitrite as N	Biochemical Oxygen Demand	Chemical Oxygen Demand	pH (standard units)	Oil & Grease
	IAC Use Designation (Chronic)								

IAC Use Designation (Acute)								6.5-9	
EPA Benchmark ³			2.0	100	0.68	30	120	6-9	15
Sunline Composite	12/27/18	1.01	0.438	168	NA	<6	16.2	NA	NA
Sunline Composite	NS	NS	NS	NS	NS	NS	NS	NS	NS
Sunline Comp	6/22/20	<1	0.2	46	NA	<6	22.6	NA	NA
Sunline Composite	10/11/21	<1	0.375	127	NA	<12	32.9	NA	NA
Sunline Grab	12/27/18	<1	0.371	165	NA	4.65	13.4	8.1	<5.7
Sunline Grab	NS	NS	NS	NS	NS	NS	NS	NS	NS
Sunline Grab	6/22/20	1.05	0.20	58.0	NA	<6	30.3	5.00	<4.9
Sunline Grab	10/11/21	<1	0.48	108	NA	<12	31.2	5.50	NA

NA: Not Analyzed

NS: Not Sampled

8. There are no records indicating that Sun Line, Inc. evaluated its SWPPP or stormwater management controls after exceeding the benchmark concentrations.
9. On October 17, 2022, I received an email from Ms. Sue Schauls (Attachment 9) that included Sun Line response to the October 3, 2022 NOPF. The email stated that, “We wanted to address the Notice of Preliminary Findings as prepared by you on October 3, 2022. Specifically, the notice asked us to address:
 - 1) Failure to implement the SWPPP. We conducted and documented inspection activity on October 6, 2022. An updated SWPPP is included.
 - 2) Evidence of spills and ground discoloration. An inspection of the salvage yard was conducted on October 6, 2022, that identified the areas of discoloration around the onsite crusher and near a storage warehouse. Corrective actions are being taken:
 - a. The warehouse area spill appeared to be a single incident and was easily cleaned up.
 - b. The crusher will have repairs made to the mechanical problems that lead to the ongoing small spills that created the discolored area as well as have catch basins put in place for any residual leakage from crushing cars. All cars that are crushed are evacuated of automotive fluids prior to crushing. Spill kits including hydrophobic mats will be located near the crusher.
 - 3) Failure to develop and implement a Spill Control and Countermeasure (SPCC) plan. An SPCC was developed that addresses the onsite storage capacity as it stands at the October 3 and 6, 2022, inspections. The current SPCC plan is included.

Based on the productivity level of 120-140 processed cars per month and the lack of an onsite used oil-fire furnace, the current used oil storage capacity exceeds the facility’s needs. The used oil recycling schedule will be increased to monthly pick up by a management company and the tankage will be reduced to no more than three (3) totes. The diesel storage tank is appropriately sized and will remain, but the gasoline tank will be replaced with a double-walled tank with a pump or by a gas buggy. As

changes are made at the facility the SPCC will be updated. Thank you for bringing to our attention the need to conduct better documentation at the facility. Signed copies of the attached documentation were mailed to you. Changes are being implemented and documentation will be ongoing". The email also included a new 2022-2027 SWPPP and SPCC.

Conclusion

1. Managerial/administrative best management practices (BMPs) and non-structural control BMPs included in the SWPPP but not implemented.
2. The only structural controls existed on site were the detention pond and the improperly installed and poorly maintained wattle at the stormwater inlet located at the northwest corner of the office building. The inlet discharges through two 4-inch outlet pipes into the Ingleside Drive SW ditch (41.93696, -91.67706).
3. The SWPPP should include a site map that shall comply with the requirement of the NPDES permit.
4. Sun Line, Inc. must reevaluate the SWPPP and revise it as needed to conform to Part III.C of the NPDES permit.
5. Sun Line, Inc. must implement the requirements of the SWPPP and the NPDES permit.
6. Based on the aboveground storage capacity of aggregate petroleum products stored on site, Sun Line, inc. must prepare in writing and implement a SPCC plan in accordance with §112.7 and any other applicable sections of 40 CFR Part 112, §112.3.

NAJI AHMAD Digitally signed by NAJI AHMAD
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Naji J. Ahmad
Environmental Engineer, WB/DWIS

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Nicole Moran
Section Chief, DWIS

ATTACHMENTS

1. R7 ISW Checklist
2. NPDES permit
3. SWPPP
4. Monitoring records/data
5. Receipt for document
6. NOPF
7. Photo log
8. Site photos
9. Sun Line Response to the NOPF