

INSPECTION REPORT

Inspection Entry Date/Time	03/08/2024 09:03 AM (AKT)	Announced: No
Inspection Exit Date/Time	03/08/2024 10:32 AM (AKT)	Access: Granted
Regulatory Program	RCRA	
Type of Inspection	Compliance Evaluation Inspection (CEI)	
Company Name	BMW of Anchorage	
Facility or Site Name	BMW of Anchorage	
Facility/Site Identifier	AKD091746925	
Facility/Site Physical Address	730 E 5Th Ave	
City, State, Zip Code	Anchorage, AK 99501	
County/Borough	N/A	
Generator Status	Very Small Quantity Generator (VSQG), as determined at the time of the inspection.	
NAICS	811198 - All Other Automotive Repair and Maintenance 44111 - New Car Dealers 44112 - Used Car Dealers	
Type of Operation	BMW Dealership and Service	
Geographic Coordinates	61.217539, -149.869914	
Mailing Address/Secondary Address	Mr. David Billman dbillman@lithia.com 730 E 5Th Ave Anchorage, AK 99501	
City, State, Zip Code	Anchorage, AK 99501	
Permit Number (If Applicable)	Not Applicable	
Lead Inspector:		
Jon Jones	Jones, Jon	Digitally signed by Jones, Jon Date: 2024.06.05 14:25:13 -08'00'
	EPA Region 10	Jones.Jon@epa.gov (907) 227-4316
Supervisor Review:		
Matt Quarterman	MATTHEW QUARTERMAN	Digitally signed by MATTHEW QUARTERMAN Date: 2024.09.09 13:36:39 -07'00'
	EPA Region 10	Quarterman.Matthew@epa.gov (206) 553-2146

SECTION I – INTRODUCTION

Site Entry and Purpose of the Inspection

Type of inspection: Compliance Evaluation Inspection (CEI)

EPA Region 10 Lead Inspector, Jon Jones, arrived at the BMW of Anchorage Facility (the “Site” or “Facility”), located at 730 E 5Th Ave, Anchorage, AK 99501, at 09:03 AM (AKT) on 03/08/2024 for an unannounced

inspection. I was accompanied by RCRA Inspectors-in-training from the Alaska Department of Environmental Conservation (ADEC).

After arriving at BMW, we spoke to a service representative that asked us to wait for the Service Manager. He called the Service Manager and then told us that he was Five minutes out and would get with us once he arrived. We waited in the reception area. After a short time, we were met by Mr. David Billman, General Manager.

EPA Region 10 Lead Inspector presented credentials to and informed Mr. Billman that this was an EPA Region 10 inspection to determine compliance with Resource Conservation and Recovery Act (RCRA).

The facility was inspected to ensure compliance with standards for hazardous waste generators and universal waste management (40 C.F.R. Part 262 through 273). The inspection was conducted as part of a Core Program requirement for FY 2024.

This report is based on information supplied by BMW of Anchorage Facility representatives, observations made by the EPA Region 10 inspector, and records and reports maintained by the facility and its HQ including, but not limited to: direct observations made by the EPA Region 10 Inspector(s), photographs taken by EPA Region 10 inspector(s), physical evidence collected by the EPA Region 10 inspector(s), measurements or samples taken by EPA Region 10 inspector(s), verbal or written statements made by information supplied by the facility representatives during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA Region 10 inspector(s) by the facility representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or subsequent to the Inspection from a review of USEPA, State, and public records may be included in this report.

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/EPA REGION 10	Jon Jones	(907) 227-4316	Jones.Jon@epa.gov	Yes	Yes
RCRA Inspector-in-training /ADEC	Alan Pefley			Yes	Yes
RCRA Inspector-in-training /ADEC	Vanessa Schmidt			Yes	Yes
General Manager/BMW of Anchorage	David Billman	(907) 646-7595	dbillman@lithia.com	Yes	Yes

Opening Conference

During the opening conference, Mr. Billman told us the wastes generated at the facility were primarily generated during the servicing of vehicles.

The facility, a member of the Lithia Auto Group NA, is a retail dealer of new and used automobiles, primarily manufactured by Bavarian Motor Works (BMW). In addition to selling vehicles the facility operates a maintenance and repair area; this area that was the focus of the inspection as this is where most of the hazardous waste is generated.

Mr. Billman told us the facility's paint and body shop portion of the business was discontinued approximately 20 years ago.

Facility/Site Information

What type of generator facility verified as?	Verified SQG by David Billman
What type of generator facility notified?	Small Quantity Generator (SQG)
Size of Facility	Approximately 50,000 square feet
Safety Training Provided to Inspector(s)?	No
Operating Hours	Monday through Friday, 9:00 a.m. to 8:00 p.m. Service Department 7:30 a.m. to 6:00 p.m.
Length of Facility at Location	Since the mid 1950's
Number of employees	42
Weather Conditions	Clear and cold

Process Description

Mr. Billman told us the following wastes were being generated:

- Waste aerosol cans
- Used oil
- Used Antifreeze
- Lead-acid batteries recycled locally for core charge
- Waste lamps

We were accompanied during the inspection by Mr. Billman.

We looked at the facility's processes, hazardous waste management practices, generation points, and accumulation areas. We looked for wastes that facility representatives had not yet identified or designated as hazardous. We also observed the facility's universal waste.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
BMW Parts Department		No
BMW Service Department		Yes
Bay 9		No
Bay 2/3		No
Bay 11/12		No
Bay 5		No
Special Tool Room		No
Bay 7	Used oil collection	Yes
BMW Showroom		No

SECTION II – OBSERVATIONS

Building: BMW Service Department/ Bay 7			
Observation #: JJ1-OB-001	Date: 03/08/2024	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Randy Giddings		Title: Used Car Technician	
While inspecting the various vehicle bays inside the Service Department we stopped at Bay 7. While there we observed a 20-gallon used oil receiver that contained used oil. The facility has many 20-gallon used oil receivers that they use to collect used oil drained from vehicles. The used oil in the receivers is periodically transferred to a larger tank with an approximate storage capacity of 500 gallons prior to being picked up for recycling. At the time of the inspection, that storage tank was labeled with the words, "Used Oil." During the inspection at Bay 7, we spoke with Mr. Randy Giddings, Service Technician, who happened to be working in the area. We asked Mr. Giddings how much used oil was in the receiver and he stated that it was full. At the time of the inspection, the 20-gallon used oil receiver was not labeled with the words "Used Oil." I explained that the used oil regulations required used oil storage containers to be labeled with the words "Used Oil." I explained that they could either label the container during the inspection or they could label it after the inspection and provide documentation that it had been labeled. Mr. Billman had Mr. Giddings label the 20-gallon used oil receiver during the inspection.			
Photo(s) 1. IMG-2024030809413641362406025.jpg 2. IMG-2024030809414441442537835.jpg 3. IMG-2024030809415641562649552.jpg 4. IMG-202403080943054352794961.jpg			

Building: BMW Service Department/Bay 9			
Observation #: JJ1-OB-002	Date: 03/08/2024	Contains AOC: No	Contains CBI: No
Person Interviewed: David Billman		Title: General Manager	
While inspecting the area around Bay 9, we saw an aerosol can on the floor. I picked up the aerosol can, shook it, and determined that the aerosol can was an empty waste aerosol can. I asked Mr. Billman how the facility managed waste aerosol cans. Mr. Billman found a Service technician nearby who stated that they probably get punctured and thrown away. When I asked where they were being punctured, the shop tech said he did not puncture them, he just threw them away. During the inspection we identified additional waste aerosol cans and didn't find any evidence that they were being punctured prior to being thrown into the trash. Based on the amount of waste aerosol cans that were being generated each month, considering the other wastes that were being generated at the facility, I told Mr. Billman that I didn't think his facility was an SQG. I told Mr. Billman that from everything I had seen during the inspection, his facility was a Very Small Quantity Generator (VSQG) of hazardous waste. Based on the VSQG determination, no area of concern was identified. I did tell Mr. Billman that taking the waste aerosol cans to the local Household Hazardous Waste (HHW) facility at the solid waste transfer station was also an option that was available.			
Photo(s) 1. IMG-2024030809503150311396780.jpg 2. IMG-2024030809504750471261787.jpg 3. IMG-202403080951015111255152.jpg			

Building: BMW Service Department/Special Tool Room			
Observation #: JJ1-OB-003	Date: 03/08/2024	Contains AOC: No	Contains CBI: No
Person Interviewed: David Billman		Title: General Manager	
While inspecting the Special Tool Room we saw a box that contained some four-foot fluorescent lamps. Upon closer inspection, we saw five of these lamps. I noticed that these lamps had darkened ends which are indicative of being waste lamps. I also saw that the lamps were marked with a manufacturer stamp on the end with green writing that is also indicative of an "Eco" lamp or low mercury lamp that will not fail TCLP for mercury. During the inspection, I explained to Mr. Billman that there were several ways that his facility could manage the lamps. I explained that he could manage the waste lamps as solid waste, but I encouraged him to manage the lamps through the local HHW facility at the solid waste transfer station.			
Photo(s) 1. IMG-2024030810115011501336228.jpg 2. IMG-2024030810115711571306737.jpg			

Building: BMW Service Department			
Observation #: JJ1-OB-006	Date: 03/08/2024	Contains AOC: No	Contains CBI: No
Person Interviewed:		Title:	
During the inspection, we had questions about the facility's management of used oil, lead-acid batteries, and their parts washer. On 3/8/24 Mr. Billman followed up with an email and provided the requested information about his facility's parts washer and the solvent used. According to the information provided, the facility uses a high-flash (143°F) solvent. The information is included in the document log. On 3/27/24 Mr. Billman followed up with another email and provided the requested information for his facility's lead-acid batteries and used oil. The information is included in the document log.			
Photo(s) 1. IMG-2024030810135613561317899.jpg			

SECTION III – RECORDS REVIEW

During the inspection, it was determined that BMW of Anchorage was a VSQG of hazardous waste and no records were reviewed.

SECTION IV – AREA OF CONCERN

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

Building: BMW Service Department	Area: Bay 7	Sub-area:
JJ1-OB-001		

At the time of the inspection, a full 20-gallon used oil receiver was not labeled with the words "Used Oil." The container was labeled, with the words "Used Oil," during the inspection.	Regulation:	Sections:
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SECTION V – CLOSING CONFERENCE AND FOLLOW UP**Closing Conference**

At the conclusion of the inspection, we conducted a closing conference that was attended by those listed in the Attendees table, in Section I of this report. We thanked Mr. Billman for his time and cooperation during the inspection and began a review of the area of concern (listed in Section III – Areas of Concern) that we observed during the inspection of the facility. I then explained the follow-up process that would take place once I finished the report. I explained they would receive a copy of the report as would a case officer. I told them the case officer would review the report to determine if any of my areas of concern documented violations.

SECTION VI – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS - No sampling was conducted.**SECTION VII – LIST OF APPENDICES**

1. Photo Log
2. Document Log

APPENDIX 1: PHOTO LOG



[Title]			IMG-2024030809413641362406025.jpg
03/08/2024 09:41 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
BMW Service Department/Bay 7			61.21690769, -149.86922003
View of the 20-gallon used oil receiver, at Bay 7, that is full of used oil, seen here not labeled with the words "Used Oil."			



[Title]			IMG-2024030809414441442537835.jpg
03/08/2024 09:41 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
BMW Service Department/Bay 7			61.21691747, -149.86944197
Close up view of the 20-gallon used oil receiver, at Bay 7, that is full of used oil, seen here not labeled with the words "Used Oil."			



[Title]			IMG-2024030809415641562649552.jpg
03/08/2024 09:41 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
BMW Service Department/Bay 7			61.21691943, -149.8694493
Another view of the 20-gallon used oil receiver, at Bay 7, that is full of used oil, seen here not labeled with the words "Used Oil."			



[Title]			IMG-202403080943054352794961.jpg
03/08/2024 09:43 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
BMW Service Department/Bay 7			61.21693634, -149.86943613
View of the 20-gallon used oil receiver, at Bay 7, after being labeled with the words "Used Oil" during the inspection.			



[Title]			IMG-2024030809503150311396780.jpg
03/08/2024 09:50 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
BMW Service Department/Bay 9			61.21694573, -149.86943429
View of waste aerosol can on the floor.			



[Title]			IMG-2024030809504750471261787.jpg
03/08/2024 09:50 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
BMW Service Department/Bay 9			61.21694381, -149.86941558
View of waste aerosol can that was found on the floor.			



[Title]			IMG-202403080951015111255152.jpg
03/08/2024 09:51 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
BMW Service Department/Adjacent to lift 9			61.21694995, -149.86946102
Another view of the waste aerosol can that was found on the floor.			



[Title]			IMG-2024030810115011501336228.jpg
03/08/2024 10:11 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
BMW Service Department/Special Tool Room			61.21692873, -149.86949992
View of four-foot waste fluorescent lamps in a box in the Special Tool Room.			



[Title]			IMG-2024030810115711571306737.jpg
03/08/2024 10:11 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
BMW Service Department/Special Tool Room			61.21704442, -149.86971323
Close-up view of four-foot waste fluorescent lamps in a box in the Special Tool Room.			



[Title]			IMG-2024030810135613561317899.jpg
03/08/2024 10:13 AM (AKT)	No CBI	No PII	Photographer: Jon Jones
BMW Service Department			61.21691002, -149.86930025
View of the facility's solvent parts washer that uses a high flash (143°F) solvent.			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Used Oil Disposal Receipts	Copy of Used Oil recycling Invoice_79903.pdf	No	No	Jon Jones	03/27/2024
Other - Battery Recycling Invoice	East Penn Battery Core Pick-up Slip.pdf	No	No	Jon Jones	03/27/2024
Other - Parts washer information	Dyna Super Brute parts washer Info.docx	No	No	Jon Jones	03/08/2024