

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At
Courtesy Ford
3921 W. River Drive
Davenport, Iowa 52802
(563) 326-4011

EPA ID Number: IAD069940344

On

September 14, 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 Courtesy Ford (COURTESY), located in Davenport, Iowa, on September 14, 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

COURTESY:

Carol Power, Controller, approximately 31 years with the company.

Tim Brus, Service Advisor, approximately 12 years with the company.

Randy Barnett, Parts Manager, approximately 43 years with the company.

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 COURTESY on September 14, 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 COURTESY at approximately 08:50 hours, September 14, 2022. I parked outside the facility in a large parking lot. I entered the facility through the sales showroom and was greeted by an employee working on the sales floor. I asked to meet with Mr. Kevin House, identified as the client contact. The employee stated that Mr. House and the General Manager were attending a business conference in Las Vegas and would not return until the next day. I responded by stating that I could speak to other employees familiar with the operation of the facility and the management of waste generated during business operations. The employee took me to the Parts/Service area, where I was introduced to Messrs. Brus and Barnett. Mr. Brus summoned Ms. Power from a corporate office located in nearby Moline, Illinois. I waited for Ms. Power's arrival in the customer waiting area. Shortly thereafter, Ms. Power joined me in the waiting area. I briefly stated the nature of my visit and Ms. Power took me to a nearby vacant office that was used throughout this inspection. Ms. Power invited Messrs. Brus and Barnett to participate in the CEI.

After exchanging pleasantries and business cards (Attachment 1), I started my entrance briefing. I presented my EPA credentials to Ms. Power and Messrs. Brus and Barnett. I next presented Ms. Power and Messrs. Brus and Barnett a copy of RCRA section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented them a copy of Title 18 U.S. Code, Sections 1001 and 1002. They were made aware of their confidentiality rights and were informed that a Confidentiality Notice would be provided at the end of the inspection to make or not to make any claims. Ms. Power acted as the official COURTESY representative throughout this inspection. Ms. Power and Messrs. Brus and Barnett participated in the exit briefing.

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. Mr. Barnett provided a site map/diagram of the facility (Attachment 2). This attachment was annotated to document the location of each photo taken during the visual inspection of the facility.

Document photocopies and 16 photographs were collected as inspection documentation (Attachments 1-9). The locations for each photo are documented 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. 2321.1C), unless noted differently.

At the conclusion of the inspection, I conducted an exit briefing, during which I summarized my findings and recommendations with Ms. Power and Messrs. Brus and Barnett. I provided Ms. Power a *Confidentiality Notice*, which she signed, indicating no confidentiality claims were made by the facility (see Attachment 3). I provided Ms. Power a *Receipt of Documents and Samples* which she signed acknowledging receipt (Attachments 4). I provided Ms. Power a *Notice of Preliminary Findings* which she 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

COURTESY is a new and used automotive dealership that sells and services new and used motor vehicles. The dealership occupies a single building occupying approximately 19,544 square feet under roof that began operating in a light-industrial area of Davenport in 1976. COURTESY employs between 25-30 personnel working 7:00-17:30, Monday-Friday and 08:00-15:00 Saturdays. The North American Industry Classification System (NAICS) code for this facility is 441110 – New Car Dealers.

4.2 RCRA Status

The facility Hazardous Waste Site Info Verification Report for Inspector (Attachment 6) identifies the facility as a non-generator of HW. However, I determined that COURTESY routinely generates approximately 30 gallons of waste parts washer solvent monthly that is managed as D039 characteristic HW and revised Attachment 6 to indicate that COURTESY is a very small quantity generator (VSQG) of HW. Ms. Power stated that COURTESY converted fluorescent lighting fixtures to light emitting diode (LED) lighting approximately between three to five years ago. She added that Lead-Acid-batteries are also generated by COURTESY and are exchanged as cores for new replacement batteries. Mr. Brus added that COURTESY generates used oil, used oil filters, used oil absorbents, and waste anti-freeze during routine preventive maintenance activities. Therefore, I inspected COURTESY as a VSQG of HW and a generator of used oil.

4.3 Facility Waste Streams and Management

Ms. Power stated that COURTESY receives HW management support from Safety-Kleen Systems, Inc., 3035 W. 73rd Street, Davenport, Iowa (Safety-Kleen), (EPA ID# IAD098027592). The documented HW stream routinely generated by COURTESY is profiled as NA 1993, Waste NA 1993 Waste Combustible Liquid (Petroleum Naphtha) PGIII DOT-SPT11606 (D039)(ERG#128) Combustible Liquid. The HW is picked up by Safety-Kleen Systems, Inc. (EPA ID# TXR000081205) and transported to the Safety-Kleen Systems facility (EPA ID# IAD098927592) where the waste is stored/bulked and transferred with no treatment or recovery. COURTESY

operates an on-site used oil burner that is used during the winter months to generate heat within the maintenance shop. Excess used oil not consumed by burning, used oil filters, used oil absorbents, waste anti-freeze, and waste contaminated fuel are picked up and transported off-site by Safety-Kleen for recycling.

The following waste streams are managed by COURTESY:

General Trash: Mr. Brus stated that COURTESY generates approximately six cubic yards of general trash weekly. The general trash consists of waste office paper, lunch wastes, and miscellaneous cardboard and packing materials. Mr. Brus 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 Republic Services of Iowa-Davenport MRF (Republic), 4002 Kimmel Drive, Davenport, Iowa, and is transported off-site to the Scott Area Landfill, 11555 110th Avenue, Davenport, Iowa, for sanitary landfill disposal.

Waste Cardboard: Mr. Barnett stated that COURTESY generates approximately six cubic yards of waste cardboard monthly. Mr. Brus stated that the waste cardboard has been determined to be non-RCRA hazardous, by virtue of product and process knowledge. The waste cardboard is picked up and transported off-site by Republic for recycling.

Scrap Metal: Mr. Brus stated that COURTESY generates approximately six cubic yards of scrap metal every two months. The scrap metal consists of old brake rotors, bushings, and coil springs and has been determined to be non-RCRA hazardous, by virtue of product and process knowledge. The scrap metal is picked up and transported off-site by Rich Metals Company (Rich), 510 Schmidt Road, Davenport, Iowa, for recycling.

Waste Parts Washer Solvent: Mr. Brus stated that COURTESY uses two Safety Kleen Model 44 parts washer for equipment maintenance activities, generating approximately 30 gallons of waste parts washer solvent monthly. According to Mr. Barnett, the parts washer contains Safety-Kleen 105 recycled solvent, described in Attachment 7. The parts washers are serviced by Safety-Kleen and the waste parts washer solvent is managed as D039 characteristic HW and is routinely picked up and transported off-site when serviced by Safety-Kleen.

Waste Fuel: Mr. Brus stated that Courtesy Ford episodically generates waste contaminated fuel that is managed as D001 and D018 Characteristic HW. The waste fuel is picked up and manifested off-site by Safety-Kleen. Quantities vary, depending upon the nature of the vehicle/event. There was no waste fuel on site at the time of this CEI.

Waste Aerosol Cans: Messrs. Brus and Barnett stated that COURTESY generates between 48-50 RCRA-empty waste aerosol cans weekly. The waste aerosol cans include glass cleaner and similar cleaning products, brake cleaner, battery cleaner, penetrating oil, and spray paint. Mr. Brus stated that the waste aerosol cans have been determined to be empty and non-RCRA hazardous by virtue of process knowledge. He stated that the RCRA-empty, non-hazardous aerosol cans are managed as mixed scrap metal and are recycled by Rich. He added that any aerosol cans that are not empty are transported to the Scott Area Landfill where they are managed as D001 characteristic HW. I provided compliance assistance regarding management of waste aerosol cans that could

potentially be hazardous waste as UW during my exit briefing.

Soiled Cloth Shop Rags: Messrs. Brus and Barnett explained that COURTESY uses four different types of cloth shop rags: white shop towels; “tea” towels; detail towels; and micro-fiber detail towels. Approximately 150 white shop towels are generated weekly. These towels are used to clean parts, tools, and machinery in the maintenance shop and may be contaminated with parts washer solvent and other commercial cleaning products/degreasers. Approximately 50 “tea” towels are generated weekly. The “tea” towels are typically used to dry washed vehicles and are not used to clean or degrease parts. Approximately 150 detail towels and approximately 50 detail micro-fiber detail towels are generated weekly. The detail towels are used for dusting and buffing washed vehicles and are not used for cleaning/degreasing parts. The towels used to dry and detail vehicles are isolated in the wash bay/detailing area. Separate metal step canisters are used to segregate and collect the various soiled cloth shop rags and soiled cloth shop rags used with parts washer solvent and/or commercial cleaning/degreasing products are not comingled with the cloth shop rags used to clean and detail vehicles. All of the soiled cloth shop rags are picked up, transported off-site, and laundered by Phelps the Uniform Specialists (Phelps), 3206 Hershey Avenue, Muscatine, Iowa.

Used Oil: Mr. Brus stated that COURTESY generates approximately 1,200 gallons of used oil annually from preventive maintenance activities. The used oil is collected in catch basins and oil collection units and then poured into an approximate 200-gallon tank that is connected to an oil burner located in the maintenance shop. Once the tank connected to the oil burner is filled, the excess used oil is collected and stored in a large above ground storage tank (AST). The used oil is pumped out of the AST and transported off-site by Safety-Kleen for recycling.

Used Oil Filters: Mr. Brus stated that COURTESY generates approximately two to three hoppers of used oil filters annually. The used oil filters are gravity hot-drained and are managed as used oil. The used oil filters are picked up and transported off-site by Safety-Kleen for recycling.

Used Oil Absorbent (Absorbents): Mr. Brus stated that COURTESY generates approximately 100 used oil absorbents annually. The used oil absorbents are combined with the used oil filters in the hopper managed as used oil, which is picked up and transported off-site by Safety-Kleen for recycling.

Waste Anti-Freeze: Mr. Brus stated that COURTESY generates between 300-400 gallons of waste anti-freeze annually. The waste anti-freeze has been determined to be non-RCRA hazardous, by virtue of product and process knowledge. However, COURTESY has elected to have Safety-Kleen manage the waste anti-freeze. The waste anti-freeze is picked up and transported off-site by Safety-Kleen. Mr. Brus was not aware of the ultimate disposition of the waste anti-freeze.

Used Tires: Mr. Brus stated that COURTESY generates between 83-120 used tires monthly. The used tires are picked up and transported off-site by Liberty Tire Recycling, 600 River Avenue, Pittsburgh, Pennsylvania, for recycling.

Spent Lead-Acid Batteries: Mr. Brus stated that COURTESY generates approximately 20 spent lead-acid batteries monthly. The spent lead-acid batteries are collected on site and exchanged as cores for new batteries with IWI Parts Motor Parts (IWI), 15560 Innovation Drive, Dubuque,

Iowa.

Process Wastewater/Sludge: Mr. Brus stated that COURTESY generates an undetermined amount of process wastewater from the washing and detailing of used and new vehicles. The process wastewater is generated in a wash bay that is outfitted with a floor drain and associated sump. The sump is located beneath the floor drain and collects dirt, sand, and debris prior to releasing the process wastewater through the sanitary sewer system to the Davenport Waste Water Treatment facility, 2606 S. Concord Street, Davenport, Iowa. Mr. Brus stated that the sump is cleaned out “every two years or so” or when necessary, as drain flow mandates. Mr. Brus stated that the process wastewater sludge consists of dirt, sand, and road debris washed off vehicles and is non-RCRA hazardous, by virtue of product and process knowledge. Mr. Brus was not aware of the amount of waste process wastewater sludge generated when the sludge was last removed from the facility. Mr. Brus stated that he thought the sludge was vacuumed from the sump and transported off-site by Safety Kleen.

4.4 Visual Inspection of Facility Waste Stream Management

I conducted a visual inspection of the facility with Messrs. Brus and Barnett. The visual inspection was conducted to observe waste stream management practices and document regulatory compliance. Photographs, checklists, and field notes were used to document observations made during the visual inspection. A Photo Log was created, and photos taken during the inspection appear in Attachment 9.

I observed one of two Safety-Kleen Model 44 parts washers located inside the Tool Room pictured in Photo 1, Attachment 9. I did not observe any environmental issues or areas of concern with the parts washers.

I observed a RED five-gallon metal step canister nearly full of soiled cloth shop rags located inside the Tool Room (Photos 2 and 3, Attachment 9). I asked Mr. Brus if the soiled cloth shop rags could be used and contaminated with parts washer solvent or other commercial cleaning/degreaser products, to which he responded affirmatively. He showed me an aerosol can of a brake cleaner product routinely used in the maintenance shop to clean parts using cloth shop rags (Photo 4, Attachment 9). I asked to see a product specification for the brake cleaner product (Attachment 8). I also observed an aerosol can of battery cleaner (Photo 5, Attachment 9) that was used with cloth shop rags to clean lead-acid batteries. I asked Messrs. Brus and Barnett if COURTESY had conducted a HW determination on the cloth shop rags that were used with parts washer solvent or other commercial degreasing products to clean parts, to which they responded negatively.

COURTESY must conduct a HW determination on the soiled cloth shop rags used with parts washer solvent and/or other commercial products in accordance with 40 CFR §262.11 (NOPF No. 1, Attachment 5).

I observed an approximate 200-gallon closed and labeled tank of used oil attached to a used oil burner that is used to heat the maintenance shop during winter months (Photos 6 and 7, Attachment 9).

I observed the wash bay used to wash vehicles before and after service (Photo 8, Attachment 9).

I observed a closed, labeled, nearly full hopper of used oil filters and absorbents shown in Photo 9, Attachment 9.

I observed a closed, plastic container, less than 1/8-full, of waste anti-freeze (Photo 10, Attachment 9). The plastic container did not bear any label to identify the container's contents. Mr. Brus stated that COURTESY would label this container "Used Anti-Freeze" as an industry Best Practice.

I observed a large, labeled, approximate 1,200-gallon AST of used oil, volume unknown, as pictured in Photo 11, Attachment 9. I mentioned that the labeling of "Used Oil" on the AST was not very legible, and Mr. Brus stated that COURTESY would refresh the AST label. I observed a used oil collection unit (Photo 12, Attachment 9) and used oil collection units/catch basins shown in Photo 13, Attachment 9.

I observed a trailer containing used tires, a scrap metal bin, a general trash bin, and a waste cardboard bin shown respectively in Photo 14, Attachment 9. The interior of the trailer used to store used tires is shown in Photo 15, Attachment 9.

I observed a cardboard container of approximately 16 spent lead-acid batteries staged inside the Parts Room for core exchange with IWI (Photo 16, Attachment 9). I did not observe any environmental issues or area of concern with the container of stored lead-acid batteries.

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

4.5 Documentation

Prior to this CEI, I reviewed 14 electronic uniform hazardous waste manifests (UHW) for HW generated by this facility, spanning the period of January 1, 2019, thru May 10, 2022. I was not able to review paper UHW on site during this CEI due to the absence of key COURTESY personnel.

5.0 SUMMARY

I documented the following preliminary finding during this CEI:

NOPE No. 1: 40 CFR §262.11: Conduct a HW determination on the cloth shop rags used with commercial products, e.g., parts washer solvent and brake cleaner to clean automotive parts (Attachment 5).

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: 9/27/2022

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 (1 page)
- 6) Hazardous Waste Site Info Verification Report for Inspector (1 page)
- 7) Safety Data Sheet (SDS), Safety-Kleen 105 Recycled Solvent (10 pages)
- 8) SDS, S & S Premium Brake Cleaner (7 pages)
- 9) Photo log (2 pages) and Photos (16 pages)