

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
RESOURCE CONSERVATION AND RECOVERY ACT**

BASIC INFORMATION

Facility Name: Tear-A-Part Auto Recycling

Facility Location: 652 South Redwood Road,
Salt Lake City, Utah 84104

RCRA ID: UTR000010819

Phone: (801) 886-2345

Notification Status: VSQG

Facility Contact: (b) (6), (b) (7)(C)
(b) (6), (b) (7)(C)

Date of Inspection: June 5, 2024

Start Time: 9:40 a.m.

End Time: 3:00 p.m.

Lead Inspector: Linda Jacobson, EPA RCRA Inspector

Other Attendees:

1. (b) (6), (b) (7)(C), RCRA Inspector
2. (b) (6), (b) (7)(C), UDEQ Inspector
3. (b) (6), (b) (7)(C) Human Resource, Safety and Environmental Manager

Type and Purpose of Inspection: Compliance Evaluation Inspection

Facility Type: Automotive recycling facility

Applicable Regulations to Inspection: R315-260 to R315-273 of the Utah Administrative Code (UAC) and R315-15 of the UAC

Inspection Type: Unannounced Inspection
EPA Inspection

OPENING CONFERENCE

☒ CBI warning to facility provided

The following information was obtained verbally during the inspection from (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C), unless otherwise noted.

General Facility and Process Description: The facility receives automobiles for recycling and sells used automotive parts to customers. It operates Monday through Saturday from 9 a.m. to 5 p.m. and Sunday from 9 a.m. to 3 p.m. There are approximately 20 employees who provide retail, processing, and call center services. It has been operating at this location for the past 15 to 20 years. There are three main areas at the facility: the retail side, the holding side, and the processing side. At the time of the inspection, there were 800 cars on the retail side. There

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were 500 to 600 cars in the holding area, where they applied for a dismantle permit before processing a vehicle. On the processing side, they remove all fluids, the batteries, the tires and rims, mercury switches, and the catalytic converters. They buy 40 to 50 cars per day or more from auction lots. They send 50 to 60 crushed cars per day for recycle. They do not purchase boats, motorcycles, campers or mobile homes. They purchase box trucks occasionally. The fire department comes out to train cutting cars using the jaws of life.

Vehicles that are private property impounds go to the holding area after being drained. Prior to purchase, they require title and proof of ownership (registration). They use the TLR state data base, which is unique to Utah, to look for the title, lien and registration. They also buy out of state cars that have the title, bill of sale, and proof of registered owner. For cars in bad shape, they do a DC, which is a direct drain and crush, without attempting to sell any parts for retail. For state/private property impoundment vehicles, they do an Impounded Vehicle Search (IVS) and send a notification to the owner, allowing 30 days to come and get the vehicle. They apply for a dismantle permit. Only 5% of owners try to get back a towed car from a police abandonment.

(b) (6), (b) (7)(C) had brought an aerial satellite Google maps printout that showed a large dark mound in the area on the retail/holding side. The facility explained that the dark material was rotomill, a paving product, which was now 1/3 the size of the dark area in the aerial photo. They had repaved the entire area last summer. They indicated that they have multiple layers of containment. The car crusher sits on a concrete pad. They have containment for spills: spill kits and oil booms. When their tanks are ¾ full, they have them drained. They have a stormwater permit and a Stormwater Management Plan. They are evaluating measures to contain the staining to control the offsite spread of oil. The facility wanted to expand but couldn't. The city is now building an Other Side Project, tiny homes and shops, on the adjacent land.

They do not service their trucks or forklifts onsite. These are serviced at the Dodge store. Komatsu maintains motors used to move cars around.

All employees receive training. They have both on-the-job and online training. The online training is conducted through Alchemy, in which the facility developed its modules, which include OSHA annual training, monthly human resources, and safety training. We also observed the availability of SDS documents in the break room.

The inspector asked the facility representative about the management of the following types of waste materials typically managed at an auto repair shop or facilities maintenance area:

- Used Oil: Rock Canyon comes biweekly for used oil pickups. Rock Canyon tests the used oil for the halogen content.

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- **Used Oil Filters:** Oil filters are left on the cars. The facility discussed the possibility of puncturing the oil filters with a screwdriver, then letting them drain the oil into a tank.
- **Batteries:** The facility buys batteries from customers for \$5. They also sell the good batteries removed from the cars to customers. If a battery is cracked, they use baking soda to neutralize it prior to sending it off for recycling. Most batteries are recycled by Natural Ventures.
- **Gasoline:** Lamb Fuel purchases the gasoline removed from vehicles, picking it up weekly to biweekly.
- **Propane:** LP Gas fills propane cylinders for the forklifts.
- **Freon:** Freon is removed using an AC vacuum machine. The employee hooks up the refrigerant machine, which is pumped to tanks. Onsite Antifreeze takes the Freon.
- **Antifreeze:** It is collected in a 500-gallon tank in the basement of the Processing Building. A portion is sold in one-gallon bottles to customers. The rest is picked up by Onsite Antifreeze.
- **Brake fluids/differential fluids:** Power steering and brake fluid removed from the vehicles are combined in a 500-gallon tank and combined with the used oil.
- **Mercury switches:** The facility is containerizing mercury switches to recycle as part of the ELVS program. They store them in white five-gallon buckets, one for pills and one for bigger switches, kept in the office area. Mr. Acosta brought the two 5-gallon white buckets into the break room and wrote "Universal Wastes Mercury Switches" with an accumulation start date of 6/16/23 on them.
- **Materials removed from cars:** Some of the vehicles arrive with oxygen and propane cylinders, fireworks, needles, and other wastes in addition to trash. Some of the cylinders were observed in the processing building. The fireworks are stored in the office to be given to the local police.
- **Car crusher:** After the cars are moved from the retail side, they are crushed. The car crusher is operated Monday through Friday. Liquids from the car crusher are combined with the used oil. The crushed cars are hauled by Coqui to either Metro Recycling or Western Metals. There are deliveries to Metro Recycling 5 to 6 times per day.
- **Aluminum/Steel wheels:** The aluminum wheels are recycled by Metro Recycling. The steel wheels are used to make wheel stands to raise the vehicles two to three feet off the ground on the retail side.

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- Catalytic converters: Catalytic converters are stored in a locked Conex box and auctioned online at Scrap CAT App.
- Bead Blast or Sand Blast Media: They do not conduct bead blasting or sand blasting.
- Floor Sumps: There are no floor sumps.
- Parts Washer Solvent: There are no parts washers.
- Anti-Freeze: Part of it is sold to customers and part is taken by Onsite Antifreeze.
- Tires: Five of the removed tires are placed back into each car to be crushed.
- Light bulbs: The maintenance person takes care of them with the facility switching some of them to LEDs.
- Trash: Republic picks up the regular solid wastes.

CBI: No CBI was discussed during the inspection.

Areas of the facility toured: We looked at the processing side of the facility where vehicles were drained of fluids and batteries, tires, rims, and catalytic converters are removed. We looked at the Truck Rack Station, the loader storage building, the processing building, the adjacent oil/water separator, and the car crusher. Beside the Truck Rack Station was a tank for gasoline and a used oil tank labeled as containing used oil. At the Truck Rack Station, I observed three unlabeled used oil caddies and drain tubes leading to the used oil tank. We also observed a drain into which netting fell. They had to put in a blue P-hose to pump out water still in the drain. We observed several places where floor dry had been placed to soak up oil. The state inspector requested the facility make a hazardous waste determination for the contaminated floor dry and analyze for metals and benzene. (b) (6), (b) (7)(C) agreed to collect a sample and use ChemTech Ford lab for analyses since he is familiar with that lab, and they will provide sample bottles.

In the processing building, we observed unchained propane cylinders and oxygen cylinders from cars. There were also compressed gas cylinders used for Freon. (b) (6), (b) (7)(C) said they load up and take full cylinders with coolant and bring new ones for Freon. In the basement of the processing building were the following four tanks: 1) Antifreeze (coolants); 2) Windshield washer fluid; 3) Waste oil (transmission fluid/brake fluid); and 4) Gasoline. On the side of the processing building were two boxes that had tubing from the basement tanks, one for used oil only and one for spent antifreeze only. The second box had tubing from the basement tanks to allow antifreeze and windshield washer fluid to fill jugs to be sold up front. Three small 100-

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gallon tanks were outside the processing building: gasoline (dirty gas), used oil, and a white tank of old gas. We were told that the old gas would be taken by Lamb Fuels. Between the old gas tank and the used oil tank were two open 5-gallon buckets that were partially full. On the other side of the processing building was an inground oil/water separator that is serviced by Sump and Trap. In the winter it is serviced two to three times per week.

The facility operates a car crusher located on a concrete pad. Behind the crusher are two spigots and a grease trap. The spigot empties into a bucket, which is emptied into a tank and one into a tote. The used oil from the tote and drum is put into the used oil tank by the processing building. Behind the loader storage building were an unlabeled red drum, an open container containing an unidentified substance, and an unmarked blue poly drum which could contain catalytic converter dust.

We also observed two pallets of shrink-wrapped batteries prepared for pickup, containing approximately 90 to 100 batteries per pallet.

Records Review: During the inspection, records were provided for five shipments of used oil picked up by Rock Canyon. Also, a record for crushed cars taken to Metro Recycling by Coqui, the bill of lading for Lamb Fuels pickup of 2056 gallons of gasoline, and one shipment to Natural Ventures for 12,100 pounds of batteries were provided. There were issues with the Rock Canyon used oil screening for the used oil halogen content on two of the records. The record for the pickup of used oil on January 25, 2024, indicated that the halogen test had a halogen content >1000 ppm. On the March 28, 2024, used oil pickup record, Rock Canyon failed to indicate the results of the halogen test.

Closing Conference and Identified Issues: Based on the limited records review, at least one load of used oil picked up by Rock Canyon had a halogen content in excess of 1000 ppm which is a violation; however, we did not see any potential sources of the halogen on the site tour. We advised them to watch Rock Canyon during the used oil pickup to ensure they were testing for halogens and appropriately denoting the results on the bill of lading.

We also advised them to put in a berm where there was oily contamination against the fence. We requested that they characterize the contaminated floor dry for the RCRA TCLP 8 metals/benzene.

We told them to label the used oil caddies and drain lines as used oil and to consider options to puncture the oil filters.

We directed them to make waste determinations for the drum and small tank by the crusher, the two 5-gallon buckets by the processing building, the white tank labeled as old gas, the red unlabeled drum, and the blue poly drum by the crusher.

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I told them I would follow up in an email to both facility representatives with a list of records to be provided, a list of actions necessary, and that I would draft an inspection report and provide them a copy within seventy calendar days and give them an opportunity to review the report to screen for confidential or proprietary information before it was posted on the EPA website. echo.epa.gov.

The state had taken five photos and EPA had collected thirty-three photos. The facility representatives looked through them and did not assert any need to withhold them.

Inspection Follow-up: The following information was requested from the facility in an email dated June 11, 2024:

- 1) At the Truck Rack Station, put the words “used oil” on 3 black oil caddies, the drain tubes and a sign on the piping leading to the used oil tank. Please provide photos of the labeled items by email.
- 2) Collect a sample of the contaminated floor dry and have it analyzed for the RCRA TCLP 8 metals and benzene. Provide the analytical results to EPA and UDEQ by email, once received.
- 3) Ensure oil filters are punctured prior to draining.
- 4) Determine the contents of the drum and small tank by the crusher and manage appropriately. Provide the determination and disposition in an email.
- 5) Determine contents of two partially full 5-gallon buckets and white/gray small tank possibly containing old gas and manage appropriately. Provide the determination and disposition in an email.
- 6) Provide one record per month for the last two years, if available, for Lamb Fuel, Onsite Antifreeze, Rock Canyon, National Ventures, Metro Group, Sump and Trap, and Thermo Fluids for waste pickup or recycling.
- 7) Provide by email a copy of the Stormwater Management Plan.
- 8) Continue measures to minimize and address oil releases and develop further measures, as needed, to prevent offsite releases such as berming.

One email update was given on June 27, 2024, from (b) (6), (b) (7)(C): “we got both totes removed from out back and drained. They were 90 percent water with some residual oil/gas in them. They were drained and the totes destroyed. We are working on labeling some pipes and containers.”

In an email dated July 24, 2024, (b) (6), (b) (7)(C) submitted Lamb Fuel bills of lading from September 12, 2022, through May 5, 2024. He also submitted used oil pickup records for ThermoFluids from November 15, 2022, through March 21, 2023, and bills of lading for Rock Canyon from May 22, 2023, through May 29, 2024. For the Rock Canyon records, the following were noted: 1) there was no indication of the halogen test results for the November 16, 2023, pickup. 2) The halogen test result was greater than 1000 ppm for the February 29, 2024, pickup. 3) There was no indication of the halogen test results for March 21, 2024.

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In this email, (b) (6), (b) (7)(C) also wrote: "We also have constructed a concrete berm where there was a concern of a potential for release to the adjacent property and are putting new oil booms down as well in that area."

In a July 15, 2024, email, (b) (6), (b) (7)(C) wrote to Tear-A-Part: "I checked with Salt Lake County about the cylinders and the fireworks. They said they could not take them. Are the cylinders empty? If they are in decent condition you could use the propane in the propane tanks, and then when they are empty you could treat them as scrap metal. Hopefully the oxygen cylinders are empty and can be treated as scrap metal. If the tanks/cylinders are not empty and can't be used you will need to contract with a hazardous waste transporter to pick them up and dispose of them. Call me and I can give you some transporter contacts. My Manager and our Assistant Director discussed the regulatory status of the materials found inside vehicles and decided the following:

- The contents of vehicles that come to you from private parties retain the household hazardous waste exemption, so you could take those to the Salt Lake County household HHW facility and dispose of them as household waste.
- Tear A Part would be considered the generator of the contents of impounded vehicles that come to you from law enforcement agencies. Some of the contents could be hazardous waste. Fireworks, non-empty cylinders, oil-based paints would all be hazardous. Perhaps you could charge the law enforcement agencies for the disposal of these items.

You said you would have a sample of the used (oily) absorbent analyzed by TCLP. Have you taken care of that yet? Please send us the results if you have them."

In a July 24, 2024, email, (b) (6), (b) (7)(C) responded to (b) (6), (b) (7)(C) email: "I will have to take a look at if the containers are full or not and then we can work on disposal from there. I should be able to get a sample into the lab next week so I can get some results."

There are remaining requested items to which the facility has not responded. These will be addressed in the inspection report transmittal letter.

SIGNATURE

Lead Inspector: LINDA JACOBSON Digitally signed by LINDA JACOBSON
Date: 2024.08.01 12:12:27 -06'00'

RCRA/OPA Enforcement Branch Manager: Susarla, Sridhar Digitally signed by Susarla, Sridhar
Date: 2024.08.01 12:20:57 -06'00'

Attachment 1: Photographs