

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

National Carwash Solutions

1500 SE 37th St.
Grimes, IA 50111
(515) 986-7590

EPA ID Number: IAD980858237

On

December 9, 2021

By

Eastern Research Group, Inc.

For

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region 7

Enforcement and Compliance Assurance Division

1.0 INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division/Chemical Branch/RCRA Section (ECAD/CB/RCRA) of the U.S. Environmental Protection Agency (EPA) Region 7, Eastern Research Group, Inc. (ERG) conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at National Carwash Solutions (NCS) in Grimes, Iowa on December 9, 2021. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. Throughout the CEI, data and information were collected to determine compliance with the applicable regulatory and statutory requirements. The inspection report and attachments present the results of the CEI.

2.0 PARTICIPANTS

National Carwash Solutions:

Kent Miller, Vice President Supply Chain and Logistics

Sarah Sabers, Vice President of Human Resources

Matt Hall, Operations Manager

Guy Rimbey, Director of Safety

EPA Representative, ERG:
Janosh Wolters, Energy Engineer

3.0 INSPECTION PRECEDURES

Due to the COVID-19 pandemic, I attempted to contact the facility via telephone on November 29th and was not able to reach anyone. After arriving unannounced at NCS at approximately 09:00, I performed a drive-by visual inspection of the facility and took a photograph before beginning the inspection and did not note any areas of concern.

I met with Mr. Miller who was inside the main entrance of the facility. I introduced myself, presented my inspector credential and explained why I was on site. Mr. Miller stated he would call Ms. Sabers because she would be a better resource for my needs. Approximately five minutes later, Ms. Sabers escorted me to an office to begin the opening conference. Ms. Sabers stated Mr. Hall would participate in the opening conference. Ms. Sabers stated that Mr. Rimbey manages the daily hazardous waste operations and was off site attending corporate training. Therefore, he would join via telephone. I initiated the opening conference with Ms. Sabers, Mr. Hall, and Mr. Rimbey representing NCS. I presented them with my inspector credentials and business card, as well as the business card of the EPA Task Order Contracting Officer Representative, Mr. Trevor Urban. I then presented a copy of RCRA Section 3007(a), which contains EPA's inspection authority. I explained my need to collect accurate information and presented Mr. Hall and Ms. Sabers with a copy of Title 18 U.S. Code, Sections 1001 and 1002. I then presented Mr. Hall and Ms. Sabers with a copy of the *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections* and reviewed NCS's confidentiality rights. I informed Mr. Hall, Mr. Rimbey and Ms. Sabers I would provide a *Confidentiality Notice* at the end of this inspection.

The inspection consisted of a discussion of facility operations, waste generation and waste management, a review of waste management records, and a visual inspection of the waste generation and management areas. Mr. Hall provided a facility layout (see Attachment 1) and explained facility operations and locations of hazardous waste generation and management.

During the visual inspection of the facility, Mr. Hall and Ms. Sabers guided me throughout the facility in order to conduct a thorough evaluation of the entire facility. At the time of the inspection, the facility only accumulated hazardous waste next to the facility's paint booth. The facility also handles universal waste in designated areas on site as shown on the facility layout. All universal waste storage areas were visually inspected. I conducted an in-depth visual inspection of the hazardous waste storage area, the universal waste storage areas, used oil storage area, and all manufacturing areas.

Nine photographs were collected as inspection documentation and are shown in Attachments 2 and 3. Information collected during the inspection is documented on the *EPA Inspection Checklist* (see Attachment 4). I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.01D), unless noted differently. At the conclusion of the inspection, I provided Ms. Sabers with a *Confidentiality Notice*, *Receipt for Documents and Samples*, and a *Notice of Preliminary Findings* which she signed as acknowledgement of receipt

(see Attachments 5, 6, and 7 respectively). No confidentiality claims were made by NCS.

The following inspection documents and compliance assistance handouts were left with NCS:

RCRA Section 3007(a)

Title 18 U.S. Code, Sections 1001 and 1002

*Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by
EPA in Connection with Inspections*

Confidentiality Notice (Facility copy)

Receipt of Documents and Samples (Facility copy)

NOPF (Facility copy)

Instructions for Responding to a NOPF

Security Awareness

Commercial Motor Vehicle Transportation

Security Planning

EPA E-Manifest Fact Sheet U.S.

EPA Small Business Resources

U.S. EPA Publication, Managing Your Hazardous Waste

U.S. EPA Publication, Managing Used Oil-Advice for Small Businesses

PowerPoint Presentation, 2013 Solvent Wipes Final Rule

Pollution Engineering Article, 10 Common Questions for Waste Generators

Iowa Department of Natural Resources (IDNR) Waste Exchange Folder and P2 Brochures

IDNR Management of Fluorescent Lamps for Businesses Information Sheets

IDNR Aerosol Can Disposal for Businesses Information Sheet

University of Northern Iowa Waste Reduction Center Information Card

Solvent-Contaminated Wipes Final Rule Summary Chart

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

NCS began operating in 1973 and currently employs approximately 200 people. The facility typically operates one 8-hour shift, Monday through Friday. The facility has a footprint of approximately 236,000 square feet. NCS operations consist of the manufacturing of complete carwashes for carwash owners. The major raw materials used are steel and weld wire. The major manufacturing or processing operation that generates waste streams include manufacturing car washes and painting. The following waste streams are produced: still bottoms, hazardous waste rags, paint booth filters, waste wash water, scrap metal, universal wastes, used oil, used oil filters, and general trash.

4.2 RCRA Status

According to the *Hazardous Waste Site Info Verification Report for Inspector* (see Attachment 8), NCS did not appear to notify with EPA with regulated waste activity. I asked Mr. Hall and Ms. Sabers to review the *Hazardous Waste Site Info Verification Report for Inspector*, which I provided prior to records review and visual inspection of the waste generation areas. Ms. Sabers

explained Ryko Solutions acquired NCS during the second quarter of 2016. Mr. Rimbey also responded via the phone that he was not sure why the form was not updated with the facility's EPA RCRA ID number. I asked Mr. Rimbey how long NCS had an EPA RCRA ID number. Mr. Rimbey stated he was not sure because when he started working for NCS, the facility already had an EPA RCRA ID number. Mr. Rimbey stated he began working for NCS in June 2018 and the facility was operating as a very small quantity generator of hazardous waste since the start of his employment. Ms. Sabers requested I update the name of the company, site contact information, and owner information. After reviewing the records and walking through the facility, I determined that the facility is operating as a VSQG of D001 and F003 hazardous wastes, a generator of used oil, and a small quantity handler (SQH) of universal waste. NCS generates less than 100 kilograms of hazardous waste monthly based on a review of facility records, a visual inspection of process and waste management areas, and interviewing personnel.

NCS has not been previously inspected by EPA or an EPA contractor. This inspection was the first time NCS was inspected for RCRA compliance.

4.3 Facility Waste Streams and Management

A Waste Stream and Waste Handling Table for NCS is presented below. The table describes waste streams generated, generation process/rates, hazardous waste determinations, and on-site/off-site management.

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#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
1	Still Bottoms	Painting conveyor system for tunnel car washes/reclaiming solvent	D001, F003 (based on process knowledge and knowledge of the product)	34 pounds per month	55-gallon containers	Heritage-Crystal Clean, LLC in Elgin, IL (ILR000130062) to Petro-Chem Processing Group in Detroit, MI (MID980615298) for incineration
2	Reclaimed Solvent	Reclaimed solvent	D001, F003 (based on process knowledge and knowledge of the product)	119 pounds per month	55-gallon containers	Heritage-Crystal Clean, LLC in Elgin, IL (ILR000130062) to Petro-Chem Processing Group in Detroit, MI (MID980615298) for incineration
3	Hazardous Waste Rags (SDS of solvent used on rags included in Attachment 9)	Cleaning small, manufactured parts and tools	Nonhazardous (based on process knowledge and knowledge of the product)	One 5-gallon container per week	5-gallon container	Waste Management in Grimes, IA to Metro Park East Landfill in Mitchellville, IA for landfill
4	Paint Booth Filters	Painting operations	Nonhazardous (based on process knowledge and knowledge of the product)	One 20-yard container per week	20-yard container	Waste Management in Grimes, IA to Metro Park East Landfill in Mitchellville, IA for landfill

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
5	Waste Wash Water	Testing car washes before delivery	Nonhazardous (based on process knowledge and knowledge of the product)	2,500 gallons per week	One 1,000 and one 1,500-gallon tanks	Hydro-Kleen LLC in Des Moines, IA (IAR000505990) for treatment
6	Scrap Metal	Facility operations	Nonhazardous (based on process knowledge and knowledge of the product)	20-yard container hauled off site twice per month	20-yard container	M. Gervich & Sons in Marshalltown, IA for recycling
7	Universal Waste Lamps	Facility maintenance	Exempted (managed as universal waste)	Eight 4-foot containers per year and one eight-foot-tall container per year	4-foot-tall containers and eight-foot-tall containers	Heritage-Crystal Clean, LLC in Elgin, IL (ILR000130062) to Petro-Chem Processing Group in Detroit, MI (MID980615298) for recycling
8	Universal Waste Batteries	Facility maintenance	Exempted (managed as universal waste)	Two 5-gallon containers per year	5-gallon containers	Heritage-Crystal Clean, LLC in Elgin, IL (ILR000130062) to Petro-Chem Processing Group in Detroit, MI (MID980615298) for recycling
9	Universal Waste Aerosol Cans	Facility maintenance	Exempted (managed as universal waste)	Four 30-gallon container every six months	30-gallon container	Heritage-Crystal Clean, LLC in Elgin, IL (ILR000130062) to Petro-Chem Processing Group in Detroit, MI (MID980615298) for recycling
10	Used Oil (Invoice provided in Attachment 10)	Facility maintenance	Exempted (managed as used oil under 40 CFR 279)	Two 5-gallon containers every three months	5-gallon containers	Heritage-Crystal Clean, LLC in Elgin, IL (ILR000130062) to Petro-Chem Processing Group in Detroit, MI (MID980615298) for recycling

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
11	Used Oil Filters	Facility maintenance	Exempted (managed as used oil under 40 CFR 279)	One 5-gallon container per year	5-gallon container	Heritage-Crystal Clean, LLC in Elgin, IL (ILR000130062) to Petro-Chem Processing Group in Detroit, MI (MID980615298) for recycling
12	General Trash	Facility operations	Nonhazardous (based on process knowledge and knowledge of the product)	20-yard container hauled off site twice per month	20-yard container	Waste Management in Grimes, IA to Metro Park East Landfill in Mitchellville, IA for landfill

4.4 Visual Inspection

Painting Operations:

At the time of the inspection, the facility operated one paint booth on site (see Attachment 3, Photo 7). Mr. Hall explained the painting operations are all conducted via manual spray paint guns. Mr. Hall explained the primary manufactured product that is painted is the conveyor system for car washes. I asked Mr. Hall how paint guns are cleaned between painting operations. Mr. Hall stated paint guns are cleaned as needed by flushing lines with acetone. During records review, Mr. Hall provided the SDS for the acetone used. The acetone SDS is provided in Attachment 9. Mr. Hall explained the paint gun lines are flushed into 5-gallon containers that accumulate spent solvent for reclamation (see Attachment 3, Photo 9).

During the visual inspection, I observed the paint booth and directly outside of the paint booth, I observed the small distillation unit (see Attachment 3, Photo 3). During records review, I asked Mr. Hall if the facility had any information on the distillation unit. Mr. Hall provided the price quote the facility received when the decision was made to purchase the still in April 2017. The price quote and operator's manual are provided in Attachments 11 and 12, respectively. I also observed the 5-gallon container holding spent solvent pending reclamation next to the distillation unit. The 5-gallon container was closed, in good condition, labeled "Spent Solvent Pending Reclamation", and had an accumulation start date of 10/1/2021. I asked Mr. Hall how often a batch is run through the distillation unit. Mr. Hall stated Mr. Rimbey would be able to answer this question more accurately. During records review, Mr. Hall contacted Mr. Rimbey via telephone, and I then asked Mr. Rimbey the question and Mr. Rimbey stated he would estimate 60 gallons per month are run through the still for reclamation. Mr. Hall then explained the still bottoms are removed as needed and placed into a 55-gallon container and managed as hazardous waste. On January 31, 2022 I contacted Mr. Rimbey via telephone to discuss the amount of solvent being calculated towards the facility's hazardous waste generation per month. I asked Mr. Rimbey how much solvent is initially run through the distillation unit each month and how much virgin solvent is added to reclaimed solvent batches. Mr. Rimbey stated the facility can vary with how much solvent is reclaimed initially each month. At the time of the inspection, I observed two 5-gallon containers that had not yet been run through the distillation unit. Mr. Rimbey stated it is common for the facility to initially have two to three 5-gallon containers of reclaimed solvent left over from the previous month. Specifically, the facility will run 5-gallons of solvent through the distillation unit per batch. Per the manufactures' details, the distillation unit has a 95% efficiency rate. Once the distillation unit runs through 5-gallons of solvent, the remaining solvent needed to fill the 5-gallon container is added. Using the efficiency rate, the distillation unit is calculated to yield approximately 4.75 gallons of reclaimed solvent. Mr. Rimbey stated the facility runs approximately 60 gallons through the distillation unit monthly which equates to 12 batches. Mr. Rimbey stated the facility always prioritizes re-running reclaimed solvent through the distillation unit in order to maintain a generation rate of less than 100kg of hazardous waste monthly. $10 - 15 \text{ gallons of initial reclaimed solvent (6.6 pounds per gallon of acetone) plus 3 gallons of virgin solvent} = 118.80 \text{ pounds}$. 118.80 pounds of reclaimed

solvent waste plus approximately 34 gallons of still bottoms per month for a total of approximately 153 pounds per month of solvent and still bottom waste. Mr. Rimbey stated reclaimed solvent is always stored in 5-gallon containers which are then used to flush paint lines. I explained to Mr. Rimbey if the facility were to notify EPA via EPA Form 8700-12, this material could be managed as a hazardous secondary material (HSM) and therefore, none of the material would be counted towards their generation status.

I observed the facility's hazardous waste storage area located directly left of the distillation unit (see Attachment 3, Photo 4). The facility used a yellow flammable storage cabinet to contain 55-gallon containers that accumulated hazardous waste. The cabinet is the only location hazardous waste is accumulated on-site. The cabinet held two 55-gallon containers of hazardous waste (see Attachment 3, Photo 5). The containers were closed, in good condition, labeled "Hazardous Waste", and labeled with an indication of the nature of the hazard.

I asked how paint booth filter waste is managed. Mr. Hall stated dried paint booth filters are replaced and added to general trash as needed. I asked if the facility generates hazardous waste rags. Mr. Hall stated rags are generated by wiping off excess solvent when flushing paint gun lines. Mr. Hall stated the rags are accumulated in a 5-gallon container (see Attachment 3, Photo 6). I asked Mr. Hall how the facility managed these rags. Mr. Hall stated the paint operators use them as needed, accumulate them inside the 5-gallon container and once full, rags are added to the general trash. I asked Mr. Hall if the rags were hazardous waste. Mr. Hall explained the facility believed the rags were not a hazardous waste. I asked Mr. Hall if rags would ever contain free liquids. Mr. Hall stated based on how the facility generates the rags, they would never contain free liquids. I explained to Mr. Hall the rags would be considered hazardous waste based on how the rags are used and if they contained any free liquids. At the time of the inspection, I believed the facility would have needed to manage this waste stream as a hazardous waste. Upon further document review, I determined this waste stream would not be a hazardous waste at the point of generation (POG) due to the composition of the waste and the fact that the rags did not contain any free liquids. Furthermore, at the time of the inspection, the rags I visually inspected did not contain any free liquids. During the telephone call on January 31, 2022 I explained my updated determination to Mr. Rimbey. Therefore, the following finding was issued in error at the time of the inspection:

~~NOPF 1—Failure to make an adequate waste determination. [40 CFR 262.14(a)(2)→262.11(a)].~~

During records review, I reviewed the facility's hazardous waste manifests and Mr. Rimbey joined via telephone. The facility appeared to have one to two shipments of hazardous waste per year. The facility appeared to be managing the still bottoms waste as a D001, D007, D008, D035, F003, and F005 hazardous waste. I asked Mr. Rimbey why the facility managed the waste with these waste codes. Mr. Rimbey stated this could have been a legacy issue because the facility does not use methyl ethyl ketone and would not generate chromium (D007) or lead (D008) wastes that would be added to the still bottoms containers. Based on my records review, and generation processes of still bottoms waste, I determined the proper waste codes to be applied to this waste stream would be D001 and F003. Mr. Rimbey also explained the facility

lists the still bottoms waste as “waste paint related material” on the hazardous waste manifest because it is the only hazardous waste generated on-site and is generated as a result of painting operations. A hazardous waste manifest for the still bottoms waste is provided in Attachment 13. Mr. Rimbey stated he understood my determination and would work with their vendor to update the waste profile and waste codes tied with this waste on future hazardous waste manifests. I considered this as overclassifying the waste stream and did not leave a finding for this issue. The facility was managing the waste as a hazardous waste but had additional waste codes that would not be applicable to the waste stream.

Wash Water Waste:

During the visual inspection, I observed a final inspection area in the northeastern corner of the facility. Mr. Hall stated this area is used to quality check assembled car washes. Mr. Hall explained the facility brings the assembled car wash station into this area and engineers test run the equipment before final delivery. The facility uses water mixture cleaning solutions in these test trials which drain to a 600-gallon sump. During records review, I asked to review the cleaning solutions SDSs for the cleaning solutions mixture with water. All cleaning products such as presoak, detergent, and waxes are mostly comprised of water and are nonhazardous. The 600 gallon is pumped into a 1,000- and 1,500-gallon wash water tanks (see Attachment 3, Photo 8). Mr. Hall explained Hydro-Klean LLC vacuum the tanks once a week and haul the wash water off site for treatment. NCS uses a nonhazardous waste manifest to ship this waste off site. An example of a manifest for this waste is provided in Attachment 14. I did not note any issues or findings with the facility’s wash water waste.

Used Oil:

NCS operates cutting operations throughout the facility to cut steel for assembly in car washes. Mr. Hall explained all the cutting is done by laser and then steel components are manually welded together. This process does not generate hazardous wastes. However, various facility equipment require oil, and this generates used oil. Mr. Hall stated the facility generates approximately two 5-gallon containers of used oil every three months. The facility accumulated used oil in in the facility’s CNC shop as labeled on the facility layout (see Attachment 3). An invoice with a used oil shipment is provided in Attachment 10. The one 5-gallon container I observed was closed, labeled “Used Oil”, and in good condition. I did not note any issues or findings at the used oil storage area.

Universal Waste:

NCS manages universal waste lamps, batteries, and aerosol cans on site. I observed a total of six 4-foot cardboard containers and one 8-foot cardboard container of universal waste lamps. The containers were located in southeastern corner of the facility as shown on the facility layout (see Attachment 1). I observed two 5-gallon containers of used batteries in the facility’s office area (see Attachment 3, Photo 2). Lastly, I observed one 30-gallon container of used aerosol cans in

the northwestern portion of the facility as labeled on the facility layout (see Attachment 1). During records review, I observed a hazardous waste manifest for aerosol cans. Mr. Hall stated the facility manages the waste as a universal waste but when it is shipped off site, the transporter requires it be shipped as a D001 hazardous waste. The manifest is provided in Attachment 15. All containers were labeled either “Universal Waste Lamps”, “Used Batteries”, or “Universal Waste Used Aerosol Cans”. The earliest accumulation start date observed was “1/1/2021” on a 4-foot container of universal waste lamps. I did not note any issues or findings at the universal waste accumulation area.

5.0 SUMMARY OF FINDINGS

~~**NOPF 1— Failure to make an adequate waste determination. [40 CFR 262.14(a)(2)→262.11(a)].**~~

This finding was issued in error. See section 4.4 for details regarding why this finding was initially left with the facility.

I observed no additional issues or findings during this inspection. However, further EPA review may add findings.

Janosh
Wolters

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Janosh Wolters
Date: 2022.02.01
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Janosh Wolters
Energy Engineer
Date: February 1, 2022

AMBER
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Amber Whisnant
Section Chief
ECAD/CB/RCRA, EPA Region 7
Date: _____

Attachments:

1. Facility Layout (1 page)
2. National Carwash Solutions Photolog (1 page)
3. National Carwash Solutions Photos (9 photos/10 pages)
4. EPA Inspection Checklist (16 pages)
5. Confidentiality Notice (1 page)
6. Receipt for Documents and Samples (1 page)
7. Notice of Preliminary Findings (1 page)
8. Hazardous Waste Site Info Verification Report for Inspector (1 page)
9. Acetone SDS (9 pages)

10. Used Oil Invoice (2 pages)
11. Solvent Recycler Quote Document (2 pages)
12. Solvent Recycler Operator's Manual (38 pages)
13. Still Bottom Manifest (1 page)
14. Wash Water Waste Manifest (2 pages)
15. Aerosol Can Manifest (1 page)

(For Contractor Use Only)

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 262.14(a)(2) → 262.11(a)

If you have any questions about this Notice or wish to discuss your response, you may call me at 484-678-8675, or Trevor Urban (Compliance Officer) at 913-551-7133.

This Notice prepared by Janosh Walters Date: 12/9/2021

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

Printed Name: Sarah Selbers Date: 12/9/2021

Signature: Shelli Selberg

Title: SVP, Human Resources