

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

PRECISION COLLISION AUTO BODY CENTER

200 N. Marquette Street
Davenport, Iowa 52802
563-322-8161 Installation Phone Number (shop)
563-340-5199 Site Contact Phone Number (cell)

EPA ID Number: Non-notifier

On

June 15, 2022

By

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region VII

Enforcement and Compliance Assurance Division

1.0 INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division (ECAD), I performed a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Precision Collision Auto Body Center, Davenport, Iowa. The inspection was conducted on June 15, 2022. The CEI was conducted under the authority of RCRA Section 3007(a), as amended. During the inspection, I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. This report and attachments present the results of the CEI. Based on the information obtained during the inspection, I inspected Precision Collision Auto Body as a very small quantity generator (VSQG) of known hazardous waste (HW), as well as a used oil generator. According to the U.S. Environmental Protection Agency (EPA) RCRAInfo database, the facility had not been previously inspected by the EPA and has not reported or obtained an EPA number.

2.0 PARTICIPANTS

Precision Collision Auto Body:

Todd Doss, Owner (32 years - owner), todd@pcautobody.com, 563-322-8161 (shop)

EPA:

Mark Holcomb, Civil Investigator (SEE) (Lead Inspector)
Tim Evans, Environmental Scientist (Training Preceptor)

3.0 INSPECTION PROCEDURES

On June 15, 2022, Mr. Evans and I arrived unannounced at the facility's main entrance at about 0900 hours. Initially I conducted a visual reconnaissance of the building/facility searching for areas of concern observable from the adjacent public roadway and parking lot. I identified no environmental issues or concerns during this preliminary examination other than apparent junk vehicles on the west outside of the West Building. Outside of the East Building we met with Mr. Doss. Mr. Doss indicated he was the owner of the company as well as the EPA site contact. Mr. Doss stated that he had owned Precision Collision Auto Body since 1990. Mr. Doss told us there were currently no specific COVID-19 staff or visitor requirements and no safety personal protective equipment (PPE) requirements at this facility.

It should be noted that this was a limited inspection due to the owner's availability. When I arrived, I observed two workers working on a vehicle in the East Building Body Shop area, and the owner working with a customer and several additional customers waiting to talk to the owner. Mr. Doss later explained that a full-time worker had called in sick and this was his part-time bookkeeper's day off. Mr. Doss was very helpful showing us around and answering questions between working with his customers.

At the opening conference, I again introduced myself and presented my EPA ID. I also introduced my colleague Mr. Evans. I explained that I was the lead investigator, but I was also in training and that Mr. Evans was my trainer and our credentialed inspector. Mr. Evans presented his credentials. I explained the purpose and procedures of the inspection. I presented Mr. Doss with a copy of RCRA Section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented him with a copy of Title 18 U.S. Code, Sections 1001 and 1002. I made him aware of his confidentiality rights and informed him that a Confidentiality Notice would be provided at the end of the inspection to make a confidentiality claim if he so desired.

The RCRA inspection consisted of a discussion of facility operations, waste generation, and waste management; a visual inspection of active waste generation and management areas. Mr. Doss was present throughout the entire inspection including the visual inspection.

I conducted a visual inspection of the following:

- East Building and Vehicle Prep Area
- Paint Room (Central Accumulation Area – CAA)
- Paint Booth
- West Building – Body Shop
- Outside West Building – Scrap Metal

See Attachment #1 for the aerial and map views of the facility and Attachment #2 for a facility diagram.

Document Photocopies and Photographs were collected as inspection documentation (see Attachments # 1-7 and Photos 1-11). The photo log is included in Attachment #3. Information collected during the inspection is documented on an Entry/Exit checklist, the hazardous waste

compliance checklists and in a notebook. I was not able to review documents such as manifests, and Safety Data Sheets (SDS). Mr. Doss stated that his bookkeeper only works two days a week, was not in the office this day, and he was not sure where she filed the old manifests. He also stated that it had been about four years since they last shipped any hazardous waste paint via Safety Kleen.

On the early afternoon of June 15, 2022, I held a closing conference. Participants included Mr. Doss and Mr. Evans. I provided Mr. Doss with a Receipt for Documents (see Attachment #4) and a Confidentiality Notice (CBI) (see Attachment #5) which he signed as acknowledgement of receipt. No confidential business information (CBI) claims were made. I summarized my findings and recommendations and provided Mr. Doss with a Notice of Preliminary Findings (NOPF), which he signed to acknowledge receipt (see Attachment #6). I provided inspection and compliance assistance documents during the inspection, some as paper versions and most in electronic PDF form via email, that included the following:

- *RCRA Section 3007(a)*
- *Title 18 U.S. Code, Sections 1001 and 1002*
- *Confidentiality Notice (Top page of the completed carbonless transfer set)*
- *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA In Connection with Inspections Receipt for Documents and Samples*
- *Notice of Preliminary Findings (NOPF) with Instructions for Responding on back of form (top page of the completed carbonless transfer set)*
- *Instructions for Responding to a Notice of Preliminary Finding (NOPF) (EPA Handout)*
- *U.S. EPA Small Business Resource Information Sheet (EPA Handout)*
- *Solvent-Contaminated Wipes Final Rule Chart (EPA Handout)*
- *Recycling Electronics (IDNR Handout)*
- *Lead-Based Paint Activities (IDNR Handout)*
- *Excluded Solvent-Contaminated Wipe Rule (IDNR Handout)*
- *Battery Recycling/Disposal (IDNR Handout)*
- *Management of Fluorescent Lamps for Businesses (IDNR Handout)*
- *Incompatible Chemicals (IDNR Handout)*
- *Universal Wastes Including Aerosol Cans (IDNR Handout)*
- *TCLP Waste Determination Testing (IDNR Handout)*
- *Industry Sector Notebooks (EPA Handout)*
- *Environmental Compliance Assistance Centers (EPA Handout)*
- *e-Manifest Fact Sheet (EPA Handout)*
- *RCRA Online A Quick Reference Guide (EPA Handout)*
- *Requirements for Used Oil Management Standards (EPA Handout)*
- *Emergency Response Program (EPA Handout)*
- *Commercial Motor Vehicle Transportation System Security & Safety*
- *Security Awareness (EPA Handout)*
- *Chemical Facility Anti-Terrorism Standards (Homeland Security Handout)*
- *Iowa Life/Changing Iowa Department of Economic Development – Iowa Environmental Guide for Business*

I followed the inspection procedures detailed in the RCRA CEI Standard Operating Procedure (SOP) 2321.01D, unless noted otherwise.

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

Mr. Doss stated that this facility location began operations in 1990. Precision Collision Auto Body has three full-time employees in addition to the owner, and one part-time bookkeeper, operating eight hours per day Monday - Friday. The facility is two small buildings of approximately 3000 square feet. Precision Collision Auto Body is privately owned by the same owner and operator of the facility. See Attachment #1 for the facility aerial view and map location. Precision Collision Auto Body primary service is auto body repair services. Products used includes paint, paint thinner (paint gun cleaner), and new and reused auto replacement parts.

4.2 Facility RCRA Status

RCRAInfo did not list any previous RCRA compliance inspections for Precision Collision Auto Body. According to the RCRAInfo Notification Acknowledgement/Verification Report, Precision Collision Auto Body has never notified or registered for an EPA number. I updated the Notification Acknowledgement/Verification form with the current contact information provided by Mr. Doss (see Attachment #7). The RCRAInfo Notification Acknowledgement/ Verification form report did not list any hazardous waste codes generated. Precision Collision Auto Body appears to be a very small quantity generator (VSQG) of hazardous waste (less than 220 pounds, or 100 kg, of non-acute hazardous waste generated per month), based on the facility's hazardous waste generation rate at the time of the inspection.

4.3 Facility Waste Streams and Management

The following waste streams are managed by Precision Collision Auto Body:

Waste Paint and Related Materials – Paint and paint related materials, such as the Gun Flush below, is used in the auto repair process for vehicle painting. Mr. Doss estimates they generate one 55-gallon drum every four years. Their use is fairly consistent month to month. Mr. Doss estimated that they may generate 15 lbs per month including the Gun Flush (see next waste stream), which goes into the same waste drum. Assuming a full 500 lb drum every four years, this would work out to about 10 lbs per month. Their hazardous waste determination is that the waste paint and related materials is hazardous waste based on product and process knowledge and has waste code: D001. Mr. Doss stated that his part-time bookkeeper only works two days per week and was not in the office this day and she was the only one that would know where the manifest documents were for their most recent shipment of the waste paint. He stated that it has been about four years since they shipped any waste paint and thought it was shipped by Safety Kleen but was not sure of any additional details.

During the visual inspection I observed one 55-gallon steel waste paint drum in the Paint Room (see photos 1 and 2). The drum appeared to be in good condition but covered with paint. The top was closed. This drum had no labels, but hazardous waste and nature of the waste labels are not required for a VSQG. The drum felt full, so I had the top unscrewed to check the volume and observed the fluid level was within an inch or two of the top. This drum functions as both the Satellite Accumulation Area (SAA) and now the Central Accumulation Area (CAA) container once it is full. Mr. Doss stated that it is their practice to fill the one drum until nearly full before calling their hazardous waste transport company (Safety Kleen), since this only occurs in roughly four-year intervals. I did not obtain information on off-site management or subsequent processing of the waste.

Gun Flush – Keystone Gun Flush is used in the auto repair process to clean the paint guns. The waste gun flush is collected in the 55-gallon drum with the above waste paint and related materials. Mr. Doss was not sure of how much they generate but stated that it would be a part of the 10-15 lbs per month of the waste paint and related material listed above. Their waste determination of the Gun Flush is hazardous waste based on product and process knowledge with waste codes of D001, F003, and F005. I asked Mr. Doss if he had an SDS for the Gun Flush or paint and he stated that they do not routinely have the SDS in the shop, but he could obtain one from his paint distributor, via fax/email, if needed for an emergency. Photo 4 shows one of the five-gallon cans of Keystone Gun Flush and the label indicates it contains: Methanol, Toluene, Acetone, and Naphtha. I did not obtain information on off-site management or subsequent processing of the waste.

Used Oil – Precision Collision Auto Body generates an estimated one gallon of used oil per year from air compressor oil changes according to Mr. Doss. During the visual inspection I did not observe any used oil containers. Mr. Doss stated that the used oil is periodically sent to O'Reilly Auto Parts Store for recycling, and he did not keep records of the shipments.

Paint Booth Filters – Precision Collision Auto Body generates paint booth air filters (see Photos 5 and 6). Exhaust filters are three-foot by 12-foot and are changed every two weeks. The intake and prefilters are changed every six months. Mr. Doss stated that they consider them to be non-hazardous based on product and process knowledge. When removed, the spent filters are put in the general trash. During the visual inspection I did not observe any spent filters. The trash dumpster is serviced weekly and taken to the local landfill.

PPE Gloves - Mr. Doss stated that Precision Collision Auto Body staff wear personal protective equipment (PPE) gloves during the painting process and are protective of the paint and solvents utilized. Mr. Doss estimates that they generate about 50 gloves per week. After use the gloves are disposed of in the trash. Mr. Doss stated that they handled them as non-hazardous, but they have not done an actual hazardous waste determination on them. During the visual inspection I did not observe any disposed of disposable gloves.

- **NOPF 1A: Failure to make a hazardous waste determination on the PPE Gloves as required in 40 CFR 262.11**

Wastewater – Mr. Doss stated wastewater from cleaning vehicles is washed down the facility drains (see Photos 5 and 7). Mr. Doss stated that soap is used to wash vehicles and only the outside of cars are washed – not the underside or engine compartments. Mr. Doss stated they do not have sediment traps collecting pit sludge and are not required to have a city wastewater permit.

Disposable Shop Rags – Mr. Doss stated that they use disposable paper rags to wipe off oil and grease. They make sure the rags are not soaked and contain no free liquids. Mr. Doss estimated Precision Collision Auto Body generates about 75 disposable rags per day. Mr. Doss stated that the rags, when generated, are disposed of in the general trash. Mr. Doss stated they handle them as non-hazardous, but they have not done an actual hazardous waste determination on them. During the visual inspection I did not observe any spent disposable shop rags.

- **NOPF 1A: Failure to make a hazardous waste determination on the disposable paper shop wipes as required in 40 CFR 262.11(a)**

Apparent Spill – During the visual inspection, I observed a dark stained area of broken concrete, approximately four foot by eight foot in area, near the outside northwest corner of the East Building (see Photo 8). Mr. Doss stated that he believed this may have been an inadvertent oil spill after an employee changed the oil on his personal vehicle and possibly left the full spent oil pan setting outside overnight and a rainstorm flooded the pan and resulted in the oil spill.

- **NOPF 1C: Failure to make a hazardous waste determination on the oil appearing stain outside northwest corner of East Building as required in 40 CFR 262.11(a)**

Lead Acid Batteries – Mr. Doss stated that generating spent lead-acid batteries in the auto body repair business is rare, but they do generate one every month or so, and manage them under 266 Subpart G. He stated that they generally do a direct core swap with their local auto parts store. Mr. Doss stated that they had accumulated three batteries that were temporarily stored outside the West Building (see Photo 10) pending recycling or more likely pickup by the local scrappers.

Scrape Metal – Mr. Doss stated that they generate a small amount of scrap metal and place it outside on the west side of the West Building. Local “scrappers” pick it up daily (see photos 9,10, and 11)

General Trash – General trash is generated by routine operations. Mr. Doss stated the trash consists of paper and plastic shipping wastes, office waste, and food containers from employees and that it is non-hazardous. The dumpster is located outside of the facility. General trash accumulates in a three-cubic yard dumpster. The trash dumpster is serviced weekly and transported to the local landfill.

4.4 Other Regulatory Requirements

Outside Facility Perimeter - I did a limited inspection of the outside perimeter of the facility and observed no hazardous waste storage tanks and containers except as noted above. I did not observe security fencing around the facility. There were several junk

vehicles and parts of vehicles outside of the west side of the West Building. Mr. Doss stated that these vehicles had been vandalized and had parts stolen. See the aerial view in Attachment #1 and Photos 9, 10, and 11.

Central Accumulation Area (CAA) – The CAA is co-located with the SAA in the Paint Room of the East Building. I did not ask about weekly inspections since this is not required for VSQG, (See Photos: 1, 2 and 3).

Preparedness and Prevention – Precision Collision Auto Body has several fire extinguishers throughout the facility and a fire suppression system inside of the paint booth. I did not ask additional questions about a contingency plan, or weekly CAA inspections since this is not required for a VSQG.

Personnel Training – I did not ask specifically about staff hazardous waste training and training documentation since this is not required for a VSQG.

5.0 SUMMARY OF FINDINGS

NOPF 1: Failure to make hazardous waste determinations, as required in 40 CFR 262.11(a), on:

- A) Disposable paper wipes**
- B) Disposable gloves**
- C) Oil appearing stain outside northwest corner of East Building 8 ft x 4 ft area**

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.

MARK HOLCOMB
(Affiliate)

Digitally signed by MARK
HOLCOMB (Affiliate)
Date: 2022.08.04 14:36:26
-05'00'

Mark Holcomb
Civil Investigator

AMBER
WHISNANT

Digitally signed by AMBER
WHISNANT
Date: 2022.08.09 17:48:35
-05'00'

Amber Whisnant
RCRA Section Chief, ECAD/CB

Attachments:

1. Facility Aerial Photo (2 pages)
2. Facility Diagram (1 page)
3. Photo Log (11 photos / 6 pages)
4. Receipt for Documents (1 page)
5. Confidentiality Notice CBI (1 page)
6. Notice of Preliminary Findings NOPF (1 page)
7. EPA RCRA Notification Acknowledgement/Verification Report (1 page)