

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At
CRST Equipment Solutions
3930 16th Avenue SW
Cedar Rapids, Iowa 52404
(319) 390-6045

EPA ID Number: IAD984567974

On

July 12, 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 CRST Equipment Solutions (CRST), located in Cedar Rapids, Iowa, on July 12, 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

CRST:

Dennis Hogan, Director of Internal Maintenance, approximately 45 years with the company.
Dennis Cook, Service Manager, approximately seven-and one-half years in this role with CRST

U.S. Environmental Protection Agency (EPA):

H. D. "Doug" Bryant, CPP, PCI, Civil Investigator, SEE, ECAD/Chemical Branch/RCRA Section (Lead Inspector)

Tiffany DeLong, Life Scientist, ECAD/Chemical Branch/RCRA Section

3.0 INSPECTION PROCEDURES

Prior to beginning the inspection, I conducted a visual reconnaissance of CRST on July 12, 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 CRST at approximately 08:30 hours, July 12, 2022. I parked outside the facility in a large parking lot. Ms. DeLong and I entered the facility and an employee welcomed us to the facility in a large entry lobby. I asked to meet with Mr. Dennis Hogan, identified as the client contact. The employee stated that Mr. Hogan was in a meeting but added that Mr. Hogan would join us at the earliest opportunity. Shortly thereafter, Mr. Hogan joined us in the entry lobby. I briefly stated the nature of our visit and Mr. Hogan took us to the Service Area and introduced us to Mr. Dennis Cook. Mr. Cook invited us to a conference area located outside his office. This conference area was used throughout this inspection.

After exchanging pleasantries and business cards (Attachment 1), I started my entrance briefing. I presented my EPA credentials to Mr. Cook. I next presented Mr. Cook a copy of RCRA section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented him a copy of Title 18 U.S. Code, Sections 1001 and 1002. He was made aware of his confidentiality rights and was informed that a Confidentiality Notice would be provided at the end of the inspection to make or not to make any claims. Mr. Cook acted as the official CRST representative throughout this inspection.

The inspection consisted of an entry briefing, 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. Cook provided a site map/diagram of the facility (Attachment 2).

Document photocopies and 17 photographs were collected as inspection documentation (Attachments 1-13). 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 Mr. Cook. I provided Mr. Cook a *Confidentiality Notice*, which he signed, indicating no confidentiality claims were made by the facility (see Attachment 3). I provided Mr. Cook a *Receipt of Documents and Samples* which he signed acknowledging receipt (Attachments 4). I provided Mr. Cook a *Notice of Preliminary Findings* which he 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

CRST The Transportation Solution, Inc. is the parent of CRST Equipment Solutions and is an American freight company with privately held corporate offices located in Cedar Rapids, Iowa, with an annual revenue in excess of \$1.5 billion. The company operates approximately 16 automotive service centers that maintain a fleet of more than 7,000 tractors and 14,000 trailers nationwide. One of these automotive service centers was the subject of this CEI. The CRST automotive maintenance facility is housed within a building occupying approximately 7,200 square feet located next to the corporate headquarters complex in a light industrial area southwest of Cedar Rapids, Iowa. This facility began operations at this location nearly 65 years ago. The CRST automotive maintenance facility has 15 employees working shifts from 06:00-23:30 hours, seven days a week. The North American Industry Classification System (NAICS) code for this facility is 811111 – General Automotive Repair.

4.2 RCRA Status

The facility Hazardous Waste Site Info Verification Report for Inspector (Attachment 6) identifies the facility as CRST Lincoln Sales and Service. Mr. Cook stated that facility name was changed to CRST Equipment Solutions within the previous year (2021). The report identifies the facility as a small quantity generator (SQG) of D001, D018, D039, and D040 characteristic HW. However, I determined that CRST generates less than 100 kg of HW monthly and revised Attachment 6 to indicate that CRST is a very small quantity generator (VSQG) of HW. Mr. Cook stated that CRST converted all fluorescent lighting fixtures to light emitting diode (LED) lighting approximately three years ago. I did not observe any waste being managed as universal waste (UW). Mr. Cook stated that CRST generates used oil and used oil filters. Therefore, I inspected CRST as a very small quantity generator (VSQG) of HW and a generator of used oil.

4.3 Facility Waste Streams and Management

Mr. Cook stated that CRST performs preventive maintenance and minor vehicular repairs to the CRST truck tractor/trailer fleet. He stated that bolt-on parts are replaced for truck tractors/trailers as required. Any necessary body work and painting repairs are not done on site but are performed by a third-party off-site vendor. CRST receives HW management support from Safety-Kleen Systems, Inc., 3035 West 73rd Street, Davenport, Iowa (Safety-Kleen), (EPA ID# IAD098027592). The only documented HW stream generated by CRST is D039 characteristic HW from a 30-gallon parts washer filled with Safety-Kleen Premium Solvent. The HW is picked up by Safety-Kleen Systems,

Inc. (EPA ID# TXR000081205) and transported to the Safety-Kleen Davenport, Iowa facility (IAD098027592) where it is stored/bulked and transferred with no treatment or recovery, fuel blending, or disposal at that site. Safety-Kleen also picks up and transports off-site used oil, used oil filters, off-specification fuel, and used antifreeze.

The following waste streams are managed by CRST:

General Trash: Mr. Cook stated that CRST generates approximately one 20-cubic yard roll-off container of general trash daily. The general trash consists of waste office paper, lunch wastes, and miscellaneous cardboard and packing materials. Mr. Cook 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 Waste Management-Cedar Rapids Hauling (WM), 4220 Thomas Drive SW, Cedar Rapids, Iowa, and transported off-site to the Cedar Rapids/Linn County Solid Waste Agency, 1954 County Home Road, Marion, Iowa, for sanitary landfill disposal.

Waste Parts Washer Solvent: Mr. Cook stated that CRST uses one 30-gallon parts washer for equipment maintenance activities, generating approximately 30 gallons of waste parts washer solvent every eight weeks. The parts washer contains Safety-Kleen Premium Solvent described in Attachment 7. The parts washer is routinely serviced by Safety-Kleen and the waste parts washer solvent is being managed as D039 characteristic HW. The waste parts washer solvent is picked up and manifested off-site by Safety-Kleen. Shipping manifests document the shipment of approximately 30 gallons of D039 characteristic HW off-site monthly, picked up and manifested off-site by Safety-Kleen.

Waste Aerosol Cans: Mr. Cook stated that CRST generates between one to two 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. Cook stated that the waste aerosol cans have been determined to be empty and non-RCRA hazardous by virtue of product and process knowledge. He stated that the RCRA-empty, non-hazardous aerosol cans are disposed in the general trash. I provided compliance assistance regarding management of waste aerosol cans that could potentially be hazardous waste as UW during my exit briefing.

Scrap Metal: Mr. Cook stated that CRST generates scrap metal from bolt-on parts replacement activities. The scrap metal is collected in one 30 cubic yard roll-off container. The container is emptied as required, averaging approximately once every two months. The scrap metal is picked up and transported off-site by Alter Metal Recycling-Cedar Rapids (Alter), 6305 11th Street SW, Cedar Rapids, Iowa, for recycling.

Spent Lead-Acid Batteries: Mr. Cook stated that CRST generates approximately one pallet of 36 spent batteries, every three months. The spent lead-acid batteries are exchanged for replacement batteries with Truck Country, 8415 6th Street SW, Cedar Rapids, Iowa. Based upon Mr. Cook's description of these transactions, the lead-acid batteries generated within the facility are being exchanged in accordance with the provisions of the 40 CFR §266, Subpart G exemption.

Brake Shoes-Core Exchange: Mr. Cook stated that CRST generates one pallet of 48 brake shoes that are exchanged for like parts with Truck Country, every other month.

Used Tires: Mr. Cook stated that CRST generates approximately 60 used tires monthly. The used tires are picked up and transported off-site by Bauer Built Tire Service (Bauer Built), 628 58th Avenue Court SW, Cedar Rapids, Iowa. The used tires are retreaded by Bauer Built at least three times until no longer viable. Tires that are no longer viable are disposed by Bauer Built on a fee basis.

Used Oil: Mr. Cook stated that CRST generates approximately 200 gallons of used oil every two weeks from routine vehicular preventive maintenance activities. The used oil is poured into a receptacle located in the service bay that is connected directly by pipe to an underground storage tank (UST) that has a capacity of at least 1,000 gallons. Used oil is pumped out and transported off-site by Safety-Kleen for recycling.

Used Oil Filters: Mr. Cook stated that CRST generates approximately two three-cubic yard roll-off containers of used oil filters every 12 weeks. 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 (Floor Dry): Mr. Cook stated that CRST generates approximately one 55-gallon container of used oil absorbent annually. The container of used oil absorbent is managed as used oil and is picked up and transported off-site by Safety-Kleen for recycling.

Waste Anti-Freeze: Mr. Cook stated that CRST generates less than 100 gallons of waste anti-freeze annually. He stated that the waste anti-freeze is non-RCRA hazardous by virtue of product and process knowledge. He added, however, that CRST corporate “Best Practices” mandate the disposition of waste anti-freeze as a non-RCRA regulated waste using the services of Safety-Kleen. Safety-Kleen picks up and transports the waste anti-freeze off site annually.

Soiled Cloth Shop Rags: Mr. Cook stated that CRST generates approximately 200 soiled cloth shop rags weekly. The cloth shop rags are used to clean truck and trailer parts, work surfaces, and operator hands. I asked Mr. Cook if soiled cloth shop could have been contaminated with commercial products, e.g., brake cleaner, to which he responded affirmatively. This matter is discussed in more detail below during my visual inspection observations of the facility. Mr. Cook stated that the soiled cloth shop rags are picked up, transported off-site, and laundered by Aramark Uniform Services (Aramark), 715 Capital Drive SW, Cedar Rapids, Iowa.

Process Wastewater: Mr. Cook stated that CRST operates a large wash bay that is used to wash tractors and trailers during maintenance activities. He stated that the process wastewater consists of water, detergent, dirt, sand, and road debris and is non-RCRA hazardous, by virtue of process knowledge. He added that the process wastewater is discharged through the sanitary sewer system to the Northwest Water Treatment Plant, 7807 Ellis Road, Cedar Rapids, Iowa. Mr. Cook was not aware of the volume of process wastewater generated by CRST.

4.4 Visual Inspection of Facility Waste Stream Management

Ms. DeLong and I conducted a visual inspection of the facility with Mr. Cook. 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 8.

I observed an approximate 300-gallon plastic container used to collect used anti-freeze (Photo 1, Attachment 2). The container contained approximately six to eight inches of liquid. Mr. Cook stated that the waste anti-freeze was non-RCRA hazardous but added that CRST disposes of the waste anti-freeze using the services of Safety-Kleen as a best business practice. Mr. Cook estimated that CRST generates less than 100 gallons of waste anti-freeze annually.

I observed two three-cubic-yard roll-off containers used to collect used oil filters (Photo 2, Attachment 2). One of the roll-off containers contained approximately 26 drained used oil filters; the other container contained approximately six used oil filters. The used oil filters are picked up and transported off-site by Safety-Kleen for recycling.

I observed one eight-cubic-yard roll off general trash container (Photo 3, Attachment 3) adjacent to the roll-off containers used to collect used oil filters pictured in Photo 2.

I observed a general trash receptacle located inside the maintenance shop (Photo 4, Attachment 2).

I observed a five-gallon step canister used to collect soiled cloth shop rags in the maintenance shop (Photos 5 and 6, Attachment 2). I observed an aerosol can of Imperial Degreaser and Brake Parts Cleaner III on a nearby work bench (Photo 7, Attachment 2). I asked Mr. Cook if the brake cleaner product is used on the soiled cloth shop rags, to which he responded affirmatively. I asked Mr. Cook if CRST has conducted a HW determination on the soiled cloth shop rags used with the commercial brake cleaner product, to which he responded negatively. **CRST must conduct a HW determination on the soiled cloth shop rags used to clean parts with a commercial brake cleaner product (NOPF No. 1a, Attachment 5).**

I observed an approximate 30-gallon parts washer located in the maintenance shop (Photo 8, Attachment 2). The parts washer was functional, appeared to be used regularly, and contained Safety-Kleen Premium Solvent, according to a label affixed to the inside of the parts washer lid.

I observed an unlabeled used oil receptacle located on the south wall of the maintenance shop. The receptacle was not labeled with the words "Used Oil" (Photo 9, Attachment 2). **CRST must label receptacles containing used oil with the words "USED OIL" in accordance with 40 CFR §279.22(c)(1) (NOPF 2, Attachment 5).** The receptacle was connected via piping to an underground storage tank (UST) containing used oil. Mr. Cook was not aware of the capacity of the UST but added that it could contain "more than 1,000 gallons" and was seldom filled to capacity. He stated that an approximately 330-gallon plastic tote was positioned nearby to accept any overflow used oil that exceeded the capacity of the UST (Photo 10, Attachment 2).

I observed a pallet of approximately 46 spent lead-acid batteries located inside the maintenance shop (Photo 11, Attachment 2). The spent lead-acid batteries are tested, charged, returned to service, or exchanged as cores with Truck Country.

I observed a nearby battery testing station and several batteries being tested and/or recharged. I observed a can of Imperial Battery Cleaner product with some cloth shop rags in a cardboard box located next to the testing station (Photo 12, Attachment 2). I asked Mr. Cook if the battery cleaning product is used with cloth shop rags to clean the lead-acid batteries, to which he responded affirmatively. I asked Mr. Cook if CRST had conducted a HW determination on the cloth shop rags used with the battery cleaning product, to which he responded negatively. **CRST must conduct a HW determination on the soiled cloth shop rags used to clean batteries and battery terminals with a commercial battery cleaner product (NOPF No. 1b, Attachment 5).**

I observed approximately 20 used tires staged for pick up by Bauer Built (Photo 13, Attachment 2).

I observed an approximate 30-cubic yard general trash roll-off container labeled “WM” Waste Management, filled with general trash outside the northern wall of the facility (Photo 14, Attachment 2).

I observed an approximate 20-cubic yard roll-off container full of scrap metal. The container was labeled with “ALTER” as shown in Photo 15, Attachment 2.

I observed a Flammable Cabinet filled with various commercial products used throughout the facility (Photos 16 and 17, Attachment 2).

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

4.5 Documentation

Prior to this CEI, I reviewed 17 electronic uniform hazardous waste manifests (UHW) for HW generated by this facility, spanning the period of February 5, 2019, thru March 3, 2022.

UHW#	DATE	Description	QTY	Unit	EPA Waste Codes
007062503SKS	5/28/2019	NA 1993, Waste Combustible Liquid (Petroleum Naphtha)	2	DM *	D039
007089303SKS	7/30/2019	NA 1993, Waste Combustible Liquid (Petroleum Naphtha)	2	DM *	D039
007110946SKS	9/18/2019	NA 1993, Waste Combustible Liquid (Petroleum Naphtha)	2	DM *	D039
007345549SKS	11/21/2019	NA 1993, Waste Combustible Liquid (Petroleum Naphtha)	1	DM *	D039
007370328SKS	12/5/2019	NA 1993, Waste Combustible Liquid (Petroleum Naphtha)	1	DM *	D039

007383734SKS	1/16/2020	NA 1993, Waste Combustible Liquid (Petroleum Naphtha)	1	DM *	D039
007390289SKS	3/4/2020	NA 1993, Waste Combustible Liquid (Petroleum Naphtha)	1	DM *	D039
007632499SKS	4/24/2020	NA 1993, Waste Combustible Liquid (Petroleum Naphtha)	1	DM *	D039
007670425SKS	6/23/2020	NA 1993, Waste Combustible Liquid (Petroleum Naphtha)	2	DM *	D039
007652758SKS	8/19/2020	NA 1993, Waste Combustible Liquid (Petroleum Naphtha)	1	DM *	D039
007714639SKS	10/12/2020	NA 1993, Waste Combustible Liquid (Petroleum Naphtha)	1	DM *	D039
007710412SKS	12/9/2020	NA 1993, Waste Combustible Liquid (Petroleum Naphtha)	1	DM *	D039
007957162SKS	8/6/2021	NA 1993, Waste Combustible Liquid (Petroleum Naphtha)	1	DM *	D039
007928646SKS	9/30/2021	NA 1993, Waste Combustible Liquid (Petroleum Naphtha)	1	DM *	D039
007950573SKS	11/23/2021	NA 1993, Waste Combustible Liquid (Petroleum Naphtha)	1	DM *	D039
008153183SKS	3/3/2022	NA 1993, Waste Combustible Liquid (Petroleum Naphtha)	1	DM *	D039

Note: * “DM” Drum contains approximately 30 gallons of D039 characteristic HW (parts washer solvent). Solvent weight was calculated at 7.2 pounds per gallon (www.aqua-calc.com). Quantities shipped were verified by “hard copy” UHWM.

While on site, I verified the five most recent shipment UHWMs, Attachments 9-13. The UHWM document one shipment of 30 gallons of D039 characteristic HW monthly. I did not observe any discrepancies with the shipping documentation/manifests maintained by the facility.

5.0 SUMMARY

I documented the following preliminary findings during this CEI:

NOPF No. 1: 40 CFR §262.11(a): Conduct a HW determination on soiled cloth shop rags used with the following commercial products:

- a. Brake cleaner used to clean parts; and**
- b. Battery cleaner used to clean battery surfaces and terminals (Attachment 5).**

NOPF No. 2: 40 CFR §279.22(c)(1): Failure to label the receptacle piping leading to the underground storage tank (UST) of used oil with the words “USED OIL” (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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BRYANT (Affiliate)
Date: 2022.08.11 08:38:43 -05'00'

Date: 8/8/2022

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 Premium Solvent (9 pages)
- 8) Photo log (2 pages) and Photos (17 pages)
- 9) UHWM 007950573SKS, dated November 23, 2021 (1 page)
- 10) UHWM 008153183SKS, dated March 3, 2022 (1 page)
- 11) UHWM 007772854SKS, dated April 28, 2022 (1 page)
- 12) UHWM 008153421SKS, dated May 26, 2022 (1 page)
- 13) UHWM 008441761SKS, dated June 24, 2022 (1 page)