

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

SIOUXLAND TRAILER SALES

3535 28th Street
Sioux City, Iowa 51105
712-277-2364

EPA ID Number IAD009702259

On

September 20, 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 Siouxland Trailer Sales, 3535 28th Street, Sioux City, Iowa. The inspection was conducted on September 20, 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 Siouxland Trailer Sales as a very small quantity generator (VSQG) of known hazardous waste (HW), a small quantity handler of universal waste (SQHUW) batteries, and a generator of used oil. According to the U.S. Environmental Protection Agency (EPA) RCRAInfo database, the facility had not had a previous inspection by the EPA.

2.0 PARTICIPANTS

Siouxland Trailer Sales:

Patrick Engle, Controller (44 years with company), pengle@siouxlandtrailer.com
Andy Jasman, Shop Foreman (38 years with company)

EPA:

Mark Holcomb, Civil Investigator/Inspector (SEE)

3.0 INSPECTION PROCEDURES

On September 20, 2022, I arrived unannounced at the facility at about 0930 hours. Initially I conducted a visual reconnaissance of the facility searching for areas of concern observable from the adjacent public roadways and parking lots. This is a large facility with perimeter security

fencing. I identified no environmental issues or concerns during this preliminary examination. I introduced myself and asked to meet with Patrick Engle, the manager listed as the site contact on the EPA Site Verification Form (last update in 1986). Mr. Engle met me and after introductions he escorted me to a spare office. Mr. Engle stated that he had been with Siouxland Trailer Sales for over 44 years and functions as the site contact for hazardous waste. Mr. Engle told me there were currently no specific COVID-19 visitor requirements and the safety personal protective equipment (PPE) requirements at this facility were safety shoes, and eye protection in some areas.

At the opening conference, I again introduced myself and presented my EPA ID and credentials. I explained the purpose and procedures of the inspection. I presented Mr. Engle 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; and a review of waste management records. Mr. Engle was present throughout the entire inspection including the opening, document review, visual inspection, and closing conference. Andy Jasman, Shop Foreman with 38 years with the company, provided some additional information during the visual inspection.

I conducted a visual inspection of the following:

- Shop
- Paint Booth
- East Lot
- East Parts Storage Room - Unheated (Photo 9)
- Parts Storage - Heated

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

Document Photocopies and Photographs were collected as inspection documentation (see Attachments #1-11 and Photos 1-11). The photo log is included in Attachment #2. Information collected during the inspection is documented on an Entry/Exit checklist, the hazardous waste compliance checklists and in a notebook. I reviewed documents including the following: Material Safety Data Sheets (MSDS); invoices; and manifests.

On the afternoon of September 20, 2022, I held a closing conference. Participants included just Mr. Engle. I provided Mr. Engle with a Receipt for Documents (see Attachment #3) and a Confidentiality Notice (CBI) (see Attachment #4), which he signed as acknowledgement of receipt. No claim of confidential business information was made. I summarized my findings and recommendations and provided Mr. Engle with a Notice of Preliminary Findings (NOPF), which he signed to acknowledge receipt (see Attachment #5). I provided inspection and compliance assistance documents to Mr. Engle during the inspection, some as paper versions and some in electronic PDF 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. Engle stated that this facility location began operations in 1961. Siouxland Trailer Sales employs about 25 staff and is open Monday – Friday, 8:00 AM to 5:00 PM. The owner of the building and property is GT Partners. The facility's primary product and services provided are sales and service of semi-truck trailers and a truck parts department. The primary materials used are steel, and aluminum sheeting. See Attachment #1 for the facility aerial view and map location.

4.2 Facility RCRA Status

RCRAInfo listed no previous RCRA compliance inspections for Siouxland Trailer Sales. According to the RCRAInfo Notification Acknowledgement/Verification Report, Siouxland Trailer Sales last notified as a Small Quantity Generator (SQG) on May 2, 1986. I verified the Notification Acknowledgement/ Verification form with Mr. Engle with only a minor street address change made (see Attachment #6). Note – the facility location did not change. The RCRAInfo Notification Acknowledgement/ Verification form report listed waste codes: D001 and F005. Siouxland Trailer Sales appears to be a very small quantity generator (VSQG) of hazardous waste (less than 100 kg or 220 lbs. of non-acute hazardous waste generated per month), based on the facility's hazardous waste generation rate at the time of the inspection. In addition, Siouxland Trailer Sales appears to be a small quantity handler of universal waste batteries, and a used oil generator.

4.3 Facility Waste Streams and Management

Mr. Engle stated that production of product and the generation of the waste streams below are fairly consistent from month to month. The following waste streams are managed by Siouxland Trailer Sales:

Waste Paint and Gun Cleaner – Mr. Engle stated that Siouxland Trailer Sales' primary hazardous waste is waste paint and thinner generated by painting trailer parts in their paint booth. The waste codes include: D001, D018, D035, D039, D040, F003, and F005. Mr. Engle stated that Siouxland Trailer Sales generates approximately one 30-gallon drum in about 18 months, or roughly 1½ gallons per month, or about 10-15 pounds per month. He indicated that their utilization of paint and thinner has decreased over the years due to changing manufacturing processes. Attachment #8 is a label from one of the primary paints they use, the Wabash Pro-Par Gray Enamel paint. The eManifest report showed the following shipments of UN1263 Waste Paint Related Materials on March 2, 2021, for 208 pounds; March 18, 2020, for 36 pounds; January 22, 2020, for 250 pounds. Mr. Engle provided three manifests (see Attachment #7) for these same three shipments of waste paint. I did note that the manifest for the January 22, 2020, shipment indicated the shipment was “1 DM” with a total quantity of “36 P” for pounds, but eManifest indicated two shipments on the same day, for the same waste, and both with the same “waste line” number of “0001”. It's possible the eManifest 250-pound shipment was an error in the eManifest report. Onsite this waste is managed in a 30-gallon drum. During the visual inspection I observed a 30-gallon steel satellite accumulation container (SAA) near to the paint booth (see Photo 5). The drum was about 7/8 full of waste paint and thinner. It had been about 18 months since this drum had last been replaced and processed by Safety-Kleen. The top of the drum was securely closed, and the drum appeared in good condition with no obvious leaks. The label indicated “Hazardous Waste”, but had no indication of the hazard, but this is not required for VSQG. Additional signage indicating the hazard “Flammable” was added at the time of the inspection (see Photo 11). The manifest indicates that this waste transported by Safety-Kleen Systems to Safety-Kleen in Dolton, Illinois, for H020 solvent recovery processing.

Used Oil – Mr. Engle stated that Siouxland Trailer Sales mechanics generate used oil during preventive maintenance of facility equipment and forklifts. Mr. Engle stated that they generate

about 50 gallons of used oil per year and must actually purchase more oil since this is used to fuel their primary heating source. Onsite the used oil is stored in a 400-gallon above ground tank. During the visual inspection I observed a ½ full 400-gallon used oil tank with an attached overhead 315,000 BTU oil-fired heater/blower. The tank appeared to be in good condition with no signs of obvious leaks. The used oil is burned onsite in their Horizon Model 315 multi-oil, 315,000 BTU, space heater. There was no “Used Oil” signage on the used oil tank (see Photos 1 and 2). A “Used Oil” sign was added at the time of the inspection (see Photo 10).

NOPF 1: Failure to mark used oil tank in Shop with “Used Oil” as required by 40 CFR 279.22(c)(1)

Spent Parts Washer Solvent – Mr. Engle stated that they have a parts washer in their maintenance area for cleaning parts, but he was not sure how much spent solvent is generated and stated that it gets “minimal use”. He stated that it is serviced periodically by Safety-Kleen, and he estimates that they use less than five gallons of cleaner solvent per year. Mr. Engle provided a MSDS for Bio Brite (see Attachment #9), which is the concentrated liquid parts cleaner that they use. The MSDS indicates the primary component is ethylene glycol monobutyl ether with a flash point of “none”. During my visual inspection I observed only one small parts washer (see Photo 3).

Paint Booth Air Filters - Mr. Engle stated that Siouxland Trailer Sales generates waste paint booth air filters as part of their trailer parts painting process (see Photo 4). He also stated that they are using the paint booth less frequently now than in the past. Mr. Engle states that the filters are dry when changed, and he estimates they change out the ten 20-inch by 25-inch by one-inch filters once every six months, or twice per year. They have determined these to be non-hazardous and dispose of them in the general trash.

Spent Batteries - Mr. Engle stated that Siouxland Trailer Sales generates only about two to three lead-acid batteries per month, and they are generally stored on a wood pallet in the East Lot until they can be core exchanged with their local auto parts store for recycling. During my visual inspection I observed two spent lead-acid batteries on wooden pallet and four spent lead-acid batteries in the East Lot near the dumpsters (see Photos 6 and 7).

Disposable Paper & Cloth Shop Wipes – Mr. Engle stated that Siouxland Trailer Sales staff use paper wipes for “cleaning everything” including, spilled coffee, oil and possibly solvents. Mr. Engle stated that they use about ten 15-pound boxes, or about 150 pounds, per year. They are considered non-hazardous and disposed of in the general trash, but they have not done an actual hazardous waste determination on them.

On October 13, 2022, I received an email from Mr. Engle stating that after additional research he had found out that they do use cloth reusable towels for their shop and paint department, and that the paper disposable wipes were used primarily around the office and parts departments. He stated that the cloth rags are laundered by Aramark and returned. He also attached a copy of a recent invoice from Aramark noting the shop towels inventory and charges, which I have added as Attachment #11 to this report. Mr. Engle asked if the hazardous waste determination was still needed. I provided him with additional information on making a hazardous waste determination

as well as reference to the *Solvent-Contaminated Wipes Final Rule - Summary Chart*, which I had provided at the time of the inspection. Final call on this will be left to the reviewing case officer. During the visual inspection, I did not observe any solvent contaminated cloth rags or cloth rag containers.

NOPF 2: Make a hazardous waste determination on the on the spent oil/solvent contaminated paper wipes as required in 40 CFR 262.11(a)

Spent Sand Blasting Medium – Mr. Engle stated that they use sand for sand blasting steel parts to roughen them up prior to painting. Mr. Engle estimates they use about 2500 cubic-feet per year. Mr. Engle stated that the sand blasting medium is local common riverbed sand, and the steel is standard manufacturing steel. They have determined this waste stream to be nonhazardous. Mr. Engle stated that they generally get one 2500 cubic-foot load per year, which is loaded into the cylindrical white tank on the roof of the Shop (see Photos 6 and 8). They then use a skid loader to remove the spent sand, about once every two months, and spread it out on the East Lot's yard.

Scrap Metal - Mr. Engle stated that Siouxland Trailer Sales generates scrap metal during manufacturing trailers, operations, and modifications. He estimates that they generate about one cubic-yard container, or one ton, every four months. This waste stream has been determined to be nonhazardous. During the visual inspection I observed scrap metal being stored in a one cubic-yard metal container in the East Lot (see Photo 6). The scrap metal is processed and recycled by State Steel Recycling locally.

General Trash – General trash is generated by routine business operations. Mr. Engle stated the trash consists of paper and plastic shipping wastes and general office wastes and that it is nonhazardous. He estimates that they generate between 1.5 to 3.4 -tons per month. Their general trash is placed in a four-cubic yard roll-off in the East Lot (see Photo 6), which is collected by Lindblom Services and sent to the local landfill in Sioux City, Iowa (see Attachment #10 for trash invoices).

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. The Siouxland Trailer Sales building is a large multi-acre facility. I did observe security fencing around the facility. See the aerial and map views in Attachment #1.

Central Accumulation Area (CAA) – They do not have a CAA. Their only hazardous waste is the waste paint and thinner and it is stored onsite in a 30-gallon steel drum which functions as a SAA and is transported before it is full.

Preparedness and Prevention – Siouxland Trailer Sales has numerous fire extinguishers throughout the facility. I did not ask many questions about their contingency plan since this is not required for a VSQG, but Mr. Engle stated that their local fire department does a safety inspection walk-through annually. There was no emergency contact phone listed posted near the SAA, but this is not required for a VSQG.

Personnel Training – I did not ask detailed questions about their training since this is not required for a VSQG.

5.0 SUMMARY OF FINDINGS

NOPF 1: Failure to mark used oil tank in Shop with “Used Oil” as required by 40 CFR 279.22(c)(1)

NOPF 2: Make a hazardous waste determination on the spent oil/solvent contaminated paper wipes as required in 40 CFR 262.11(a)

I noted that since they last notified in 1986 as a small quantity generator (SQG), they probably should have re-notified, using EPA form 8700-12, prior to September 1, 2021, as required in 40 CFR 262.18(d)(1), but since they were a VSQG at the time of the inspection this may have not been required.

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)



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Mark Holcomb
Civil Investigator

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Amber Whisnant
RCRA Section Chief, ECAD/CB

Attachments:

1. Facility Aerial & Map View (2 pages)
2. Photo Log (11 photos / 6 pages)
3. Receipt for Documents (1 page)
4. Confidentiality Notice CBI (1 page)
5. Notice of Preliminary Findings NOPF (1 page)
6. EPA RCRA Notification Acknowledgement/Verification Report (1 page)
7. Manifests for Waste Paint (3 pages)
8. Paint Label (1 page)
9. MSDS Bio Brite Parts Cleaning Solution (4 pages)
10. Invoice- General Trash (4 pages)
11. Aramark Invoice – Shop Rags (1 page)