

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

COMMUNITY MOTORS BODY SHOP

2531 Falls Ave
Waterloo, Iowa 50704
(319) 234-8884

EPA ID Number: IAD042189902

On

April 30, 2024

By

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 (ECAD), I conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Community Motors Body Shop, located in Waterloo, Iowa, on April 30, 2024. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. During the inspection, I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. This inspection report and attachments present the results of the CEI.

2.0 PARTICIPANTS

Community Motors Body Shop:

- Jered Engel, Body Shop Manager (2 weeks with company)
- Sherry Weber, Receptionist (10 years with company)
- Luke Schmitt, General Manager - Community Motors
- Jeff Roberts, Painter (10 years with company)

EPA:

- Mark Holcomb, Civil Investigator/Inspector (SEE)

3.0 INSPECTION PROCEDURES

On April 30, 2024, I arrived unannounced at the facility's main entrance at about 0900 hours. Initially, I conducted a visual reconnaissance of the facility searching for areas of concern observable from the adjacent public roadways and parking lots. I identified no environmental issues or concerns during this preliminary examination. I entered the facility through the main

entrance and stopped at the front office area. I introduced myself and asked for the Facility Manager. I was introduced to Mr. Jered Engel, and he escorted me to his office. Mr. Engel stated that he was the primary RCRA contact for the facility, and that he had only been with the company for about two weeks. Mr. Engel told me the only items of personal protective equipment required for our visual inspection at this facility was eye protection in limited areas.

At the opening conference, I presented my EPA ID and credentials to Mr. Engel. I next explained the purpose and procedures of the inspection. I then presented Mr. Engel 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. He was made aware of his confidentiality rights, and I informed him that a Confidentiality Notice would be provided at the end of the inspection to make a confidentiality claim if he so desired. Mr. Engel acted as the official facility representative during the inspection. Mr. Luke Schmitt, General Manager for the associated Community Motors organization, arrived during the visual inspection and was present for the document review and exit conference.

The CEI 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 and documents.

I conducted a visual inspection of the following areas:

- Wash Bay & Detailing Area
- Main Shop
- Paint Booth
- Storage Room
- Paint Mix Room
- Outside North Lot

See Attachment #1 for the aerial/map views, and Photos 1-2 for an overview of the Detailing Area and Main Shop. Document photocopies and photographs were collected as inspection documentation (see Attachments #1-12 and Photos 1-12). The photo log is included as 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: Safety Data Sheets (SDS), bills of lading, and invoices. I followed the inspection procedures detailed in the RCRA CEI Standard Operating Procedure 2321.01E, unless noted otherwise.

At the conclusion of the inspection, I provided Mr. Engel with a Receipt for Documents (see Attachment #3) and a Confidentiality Notice (see Attachment #4), which he signed as acknowledgement of receipt. No claim of confidential business information was made by Mr. Engel. I indicated on the Notice of Preliminary Findings (NOPF) form that there were no preliminary findings observed at the time of the inspection. I left a copy of the NOPF form with the instructions on how to respond if any findings are added post inspection (see Attachment #6). I provided inspection and compliance assistance documents to Mr. Engel during the inspection, some as paper versions and some in electronic PDF via email post-inspection, that included the following:

- *RCRA Section 3007(a) (EPA Handout)*
- *Title 18 U.S. Code, Sections 1001 and 1002 (EPA Handout)*

- *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 (EPA Handout)*
- *Receipt for Documents and Samples (Top page of the completed carbonless transfer set)*
- *NOPF (top page of the completed carbonless transfer set)*
- *Instructions for Responding to a NOPF (EPA Handout)*
- *U.S. EPA Small Business Resource Information Sheet (EPA Handout)*
- *Solvent-Contaminated Wipes Final Rule Chart (EPA Handout)*
- *Recycling Electronics (Iowa Department of Natural Resources - 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 (EPA Handout)*
- *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 (IDNR Handout)*
- *How to Register for RCRAInfo Industry Application for Iowa Facilities (IDNR Handout)*

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

Community Motors Body Shop is a commercial autobody repair shop operated by a group of car dealerships called Community Motors. Mr. Engel stated that the body shop facility had been in operation for greater than 20 years. The body shop is about 18,000 square feet and operates with eight employees from 0730-1700 Monday–Friday. Mr. Engel estimates they service about 86 vehicles per month. Mr. Engel stated that he was not aware of any previous EPA RCRA inspections or any spills or activations of their emergency plan. See Attachment #1 for the facility aerial map views.

4.2 RCRA Status

Community Motors Body Shop had not been previously inspected for RCRA compliance. According to RCRAInfo, the facility had most recently notified as a Small Quantity Generator

on June 13, 1994. I verified the facility address and the site contact information with Mr. Engel and he indicated no updates to the EPA RCRA Notification Acknowledgement Verification Report. Mr. Engel stated that the site primary contact listed is the Community Motors owner (see Attachment #5). At the time of this inspection, I determined Community Motors Body Shop to be a Very Small Quantity Generator of hazardous waste with less than 100 kg, or 220 lbs, of non-acute hazardous waste generated per month. In addition, I determined the facility to be a used oil generator.

4.3 Facility Waste Streams and Management

Mr. Engel stated that the following waste streams are managed by Community Motors Body Shop:

Waste Paint and Related Materials - Community Motors Body Shop generates about 28 pounds per month of waste paint and thinner from vehicle painting operations. This waste had been determined to be D001 hazardous waste based on process and product knowledge. See Attachments #8-10 for the SDS for commonly used paints and the thinner/reducer used. Onsite, the waste paint and thinner is stored in 55-gallon drums in the Paint Mix Room. The eManifest report for the last three years shows only one shipment of this waste stream – the shipment of five drums, at 330 gallons (2,752 pounds), of paint related materials on February 8, 2022, transported by Hydrite Chemical (Iowa) to Tradebe Treatment & Recycling (East Chicago, Indiana) for H061 management (fuel blending prior to energy recovery at another site) (see Attachment #7 for the Manifest and LDR). Mr. Jeff Roberts (Painter) stated that the waste paint and thinner are added to the 55-gallon drum with the funnel in the Paint Mix Room, which is located next to the Paint Booth. Of the three 55-gallon drums present, one is a full, one is a half full, and one is empty pending later use (see Photos 5-10). Mr. Roberts stated that less than 80 gallons of waste paint/thinner has been accumulating since the last hazardous waste shipment in February 2022 – which calculates out to a generation rate of about three gallons, or 25-30 pounds, per month. During the visual inspection, the Paint Booth was in use and I did not inspect it. However, I did observe that it had a fire suppression system (see Photo 3).

Soiled Cloth Rags - Community Motors Body Shop generates about 100 soiled cloth rags per week. Mr. Engel stated that the facility uses white cloth rags. He stated that the white shop rags may get oily and are commercially laundered locally. He also stated that the white shop rags are used primarily for detailing and buffing cars, and not used with solvents. The white shops rags are considered non-hazardous waste based on product and process knowledge. During the visual observation, I observed a cloth bag for white shop rags in the Detail Area (see Photo 12). The white shop rags appeared to be dry.

Waste Paper Wipes - Community Motors Body Shop generates about 100 paper wipes per month. Mr. Engel stated that the paper wipes are typically used to clean greasy or soiled parts and are not used with solvents. The waste paper wipes are considered non-hazardous waste based on product and process knowledge. Mr. Engel stated that the waste paper wipes are lightly soiled, dry with no free liquid, and disposed of in the general trash.

Used Oil - Community Motors Body Shop generates about one gallon per month of used oil from the repair of damaged vehicles. Mr. Engel stated that they are a body shop only and any routine oil changes or general maintenance is done at their Auto Repair Shop at the main Community Motors Dealership. Onsite, the used oil is transferred to a one-gallon plastic containers and transported to the Main Dealership's shop for recycling. I did not inspect the Main Dealership shop. During the visual inspection, I did not observe any used oil stored onsite.

Spent Used Oil Filters - Community Motors Body Shop generates about one spent used oil filter per month from damaged vehicle repairs. This waste had been determined to be non-hazardous based on product and process knowledge. Mr. Engel stated that the spent used oil filters are punctured and hot drained for 24 hours and then disposed of in the general trash. The used oil is collected in a one gallon used oil storage containers. During the visual inspection, I did not observe any spent used oil filters.

Scrap Metal - Community Motors Body Shop generates about 800-1,000 pounds of scrap metal per week from vehicle repair operations. The scrap metal had been determined to be non-hazardous based product and process knowledge. The scrap metal is collected in Outside North Lot in an eight cubic-yard bin. During the visual inspection, I observed this container to be about half full (see Photo 11). Mr. Engel stated that Iowa Metal Recycling (Evansdale, Iowa) periodically picks up the scrap metal for recycling (see Attachment #12 for an invoice).

Waste Coolant - Community Motors Body Shop generates about ten gallons of waste coolant from damaged vehicle repair operations. The waste coolant had been determined to be non-hazardous based product and process knowledge. Onsite, the facility stores the waste coolant in the original coolant one-gallon containers and temporarily stores them in the Storage Room. Mr. Engel stated that every few months the full containers of waste coolant are transported to the main Community Motors Maintenance Shop for disposal and recycling. During the visual inspection, I observed about 25 one-gallon containers of waste coolant in the Storage Room (see Photo 4). The containers appeared to be in good condition and free of any damage or leaks.

Spent Lead-Acid Batteries - Community Motors Body Shop generates about one to two spent lead-acid batteries per year from vehicle repair operations. The spent lead-acid batteries are managed under Part 266, Subpart G. The facility has a core exchange with NAPA and Interstate batteries (Waterloo, Iowa). I did not observe any spent batteries onsite.

Spent Paint Booth Air Filters - Community Motors Body Shop generates about one spent paint booth air filter once every two months (exhaust filters) or every six months (intake filters), based on usage. Mr. Engel stated that the dry spent paint booth air filters (non-hazardous waste based on product and process knowledge) are rolled up, placed into cardboard containers, and disposed of in the general trash.

General Trash and Recyclable Cardboard - Community Motors Body Shop generates non-hazardous general trash and cardboard from repairs, painting, and general business office operations. The facility estimates it generates about 1,000 pounds per week. The general trash is picked up weekly by Black Hawk Waste Disposal (Waterloo, Iowa) (see Attachment #11 for an invoice) and transported to the local landfill. During the visual inspection, I observed two 6

cubic-yard dumpsters in the Outside North Lot. The trash dumpster was empty, and the recyclable cardboard dumpster was about 1/5 full (see Photo 11).

4.4 Other Areas Reviewed

Other Wastes - Mr. Engel stated that the facility has changed to all LED lights, and I did not observe any spent fluorescent lamps stored onsite. Mr. Engel also stated that he was not aware of any deployed or waste air bags being generated recently. I did not observe any waste air bags stored onsite. Mr. Engel stated that they do not generate waste tires and that all tire repairs are subbed out to local tire shops for repair. I did not observe any waste tires on site.

Outside Facility Perimeter - I conducted a limited inspection of the outside perimeter of the facility and observed no hazardous waste storage tanks or containers except as noted above. See the aerial and map views in Attachment #1.

5.0 SUMMARY OF FINDINGS

No preliminary findings or compliance issues were observed at the time of the inspection. However, further EPA review may include findings.

MARK HOLCOMB
(Affiliate)

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Mark Holcomb
Civil Investigator, SEE

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Amber Whisnant
RCRA Section Chief, ECAD/Chemical Branch

Attachments:

- 1) Facility Aerial Map Views (3 pages)
- 2) Photo Log (12 photos and 13 pages)
- 3) Receipt for Documents (1 page)
- 4) Confidentiality Notice (1 page)
- 5) EPA RCRA Notification Acknowledgement/Verification Report (1 page)
- 6) NOPF (1 page)
- 7) Manifest and LDR 02/08/2022 (4 pages)
- 8) SDS – Acrylic Urethan Clearcoat (14 pages)
- 9) SDS – Autobase Deep Black Paint (18 pages)
- 10) SDS – Reducer Thinner (18 pages)
- 11) Invoice – Black Hawk Waste Disposal (1 page)
- 12) Invoice – Iowa Metal Recycling (1 page)