REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At
Collision Solutions Truck Repair, LLC
1517 East Aurora Avenue
Des Moines, Iowa 50313
(515) 412-1722

EPA ID Number: IAR000000109

On

February 24, 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 Collision Solutions Truck Repair, LLC (Collision Solutions) located in Des Moines, Iowa, on February 24, 2022. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. Collision Solutions was previously inspected for RCRA compliance August 18, 2005. During this CEI, I collected the informationand 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

Collision Solutions:
Shaun Clinger, Owner, approximately one year with the company.

U.S. Environmental Protection Agency (EPA):
H. D. "Doug" Bryant, CPP, PCI, Civil Investigator, NOWCC/SEE, ECAD/Chemical Branch/RCRA Section.

3.0 INSPECTION PROCEDURES

Prior to beginning the inspection, I conducted a visual reconnaissance of Collision Solutions on February 24, 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 Collision Solutions at approximately 0830 hours, February 24, 2022. I entered a lobby featuring a walk-up counter staffed by an employee. I asked for Mr. Jeffrey Schroder, identified as the facility contact. The employee responded that Mr. Schroder worked for McKenna Collision and the property had changed ownership "a couple of times" and the new owner was sitting at a nearby desk. Mr. Clinger, the owner, spoke up and asked how he could help. I moved out of the entry area to Mr. Clinger's desk, where we exchanged greetings and I briefly explained the purpose of my visit. We used Mr. Clinger's desk as a work area throughout this inspection.

I presented my EPA credentials, and Mr. Clinger and I exchanged business cards (Attachment 1). I next presented Mr. Clinger 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. Clinger acted as the official facility representative during the inspection.

The inspection consisted of an entry briefing, a discussion of facility operations, waste generation and waste management, a review of waste management records, emergency preparedness and planning, and a visual inspection of the waste generation and management areas. Mr. Clinger drew and provided a site map/diagram of the facility (Attachment 2).

Document photocopies and 9 photographs were collected as inspection documentation (Attachments 1-17). 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. Clinger. I provided Mr. Clinger a *Confidentiality Notice,* which he signed, indicating no confidentiality claims were made by the facility (see Attachment 3). I provided Mr. Clinger a *Receipt of Documents and Samples* which he signed acknowledging receipt (Attachments 4).

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)
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)
RCRA Online A Quick Reference Guide (EPA Handout)
Emergency Response Program (EPA Handout)
Security Awareness (EPA Handout)
Managing Your Hazardous Waste: A Guide for Small Business (EPA Handout)

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

This facility is located in a light industrial area in the northeastern area of the Des Moines metropolitan area. The facility was previously owned most recently by GATR Truck Center. Previously, the facility was owned and operated by McKenna Collision. The facility began operating at this location in 1993. The facility performed a variety of collision services that generated waste streams that are no longer generated at the facility, e.g., radiator repair. Collision Solutions has operated the facility at this location since January 2021. Collision Solutions has eight employees working Monday through Friday, 08:00-16:30. The facility occupies approximately 15,000 square feet under roof. The North American Industry Classification System (NAICS) code for this facility is 81112 – Automotive Body, Paint, Interior, and Glass Repair.

Collision Solutions is a collision repair truck and recreational vehicle (RV) repair center that conducts collision body repair and auto painting. Collision repair and auto painting operations include bending and straightening metal parts, replacing metal and plastic automotive parts, fiber glass fabrication, body filling using commercial body putty, sanding, paint preparation masking, painting, buffing, vehicle washing and detailing. Collision Solutions also empties and stores coolant from damaged air conditioner compressors.

4.2 RCRA Status

Collision Solutions was previously inspected August 18, 2005, for RCRA compliance as a conditionally exempt small quantity generator (CESQG) of hazardous waste (HW). Findings documented during that inspection are described below in section 5.0 Summary of this report. Mr. Clinger stated that the facility has generated approximately one third of a 55-gallon drum of paint-related HW since December 15, 2021.

The facility Notification Acknowledgement/Verification Report identifies the facility as a very small quantity generator (VSQG) of D001 characteristic and F003 and F005 listed HW (Attachment 5). The facility has converted some lighting to light emitting diode (LED) fixtures in the administrative office and paint booth; the remainder of the facility uses conventional fluorescent lighting. Collision Solutions manages spent batteries as universal waste (UW). I determined that the facility generates

less than100 kg of D001 characteristic and F003 and F005 listed HW monthly, and I inspected Collision Solutions as a VSQG of HW and a small quantity handler of universal waste (SQHUW). Collision Solutions does not generate any used oil.

4.3 Facility Waste Streams and Management

Collision Solutions has contracted Safety-Kleen Systems, Inc.(Safety-Kleen) (IAD981718000), 4704 NE 22nd Street, Des Moines, Iowa, to assist in HW management. HW shipments are picked up and transported by Safety-Kleen (TXR000081205) to Safety-Kleen (IAD98171800) where this waste is stored/bulked and transferred with no treatment or recovery.

Mr. Clinger explained that Collision Solutions operates one large painting booth, capable of accommodating two large trucks simultaneously. The dimensions of the paint booth are approximately 20 feet wide by 70 feet long by 20 feet high. The booth is outfitted with a hose and paint gun that are used to apply Axalta Imron Elite family of solvent-based coating products (Attachments 6-12). He stated that Axalta thinner (Attachment 13) is used to clean the hoses used with all coating products. He cleans his paint guns in a paint gun parts washer using Naked Gun VOC Compliant Gun Cleaner (Attachment 14). The paint related wastes and waste solvent are combined in one 55-gallon container and are managed as D001, D018, D035, D039, D040 characteristic and F003 and F005 listed HW.

The following waste streams are managed by Collision Solutions:

Waste Paint/Solvent (mixed/combined): Mr. Clinger stated that paint is mixed in a paint mixing room using a computer-controlled dispensing and mixing system. This system minimizes the generation of paint waste. Paint is dispensed into flexible plastic cups that are placed in a paint gun dispensing unit. The paint line and paint gun are "flushed" after coating applications using thinner. The waste paint/solvent is collected in a five-gallon container located inside the paint booth. This container is managed as a satellite accumulation area (SAA) of HW. The five-gallon container is transported from the paint booth to the HW central accumulation area (HWCAA), where it is emptied into a 55-gallon mixed waste paint/solvent container. This is accomplished whenever the SAA container of HW is filled and/or at the end of each shift. He added that paint guns are cleaned in a paint gun parts washer, using the Naked Gun cleaning product cited above. When no longer viable, the paint gun parts washer solvent is collected and combined with the 55-gallon mixed waste paint/solvent container. This waste stream of paint-related waste and mixed waste solvent is profiled as UN 1263, Waste Paint-Related Material, managed as D001, D018, D035, D039, D040 and characteristic and F003 and F005 listed HW. Mr. Clinger stated that Collision Solutions generates less than five gallons of this mixed solvent waste stream monthly. The waste paint/solvent is picked up and manifested off site by Safety-Kleen.

I reviewed the product specification for Stratum White Urethane Primer Pt A (Attachment 7) while preparing this report and determined that the primer product may contain lead, mercury, arsenic, and cadmium. I reached out to Mr. Clinger and determined that he was not aware of the possibility that this product may contain heavy metals that could be generated in the paint

related waste stream (Attachment 17). Mr. Clinger stated that he has used a total of six gallons of this product on two occasions during the previous 12 months. He stated that any waste primer and waste solvent generated during these two painting projects was disposed in the waste paint/solvent (mixed/combined) container described above. I informed Mr. Clinger that **Collision Solutions must conduct an adequate waste determination on the waste stream(s) generated containing the Stratum White Urethane Primer Pt A product in accordance with 40 CFR §262.11 (NOPF added after the CEI).**

Spent Paint Booth Filters and Waste Paint Booth Paper: Mr. Clinger stated that Collision Solutions generates approximately 840 square feet of spent paint booth filters annually and approximately 20 square feet of waste paint booth paper weekly. According to Mr. Clinger, the spent paint booth filters and waste paint booth paper have been determined to be non-RCRA hazardous, by virtue of product and process knowledge. He added that he has not yet changed the paint booth filters this year. He stated that the waste paint booth paper is disposed in the general trash. This HW determination may require modification, based upon the HW determination conducted for the waste Stratum White Primer waste stream discussed above.

Cloth Shop Rags: Cloth shop rags are used throughout the facility for cleaning dust and dirt from the surfaces of being repaired and detailed. He added that the cloth shop rags are not used in the painting area. Mr. Clinger stated that Collision Solutions generates between 20-30 soiled cloth shop rags weekly. Mr. Clinger stated that the soiled cloth shop rags are non-RCRA hazardous, based upon his knowledge of the products used and the processes undertaken. Mr. Clinger stated that the cloth shop rags are laundered on site using a washer and dryer owned and operated by Collision Solutions.

Waste Paper Disposable Wipes/Personal Protective Equipment (PPE): Waste paper disposable wipes are generated throughout the facility. The waste paper disposable wipes are used for cleaning vehicles, work areas, and cleaning paint guns and painting equipment. The wipes used to clean coating equipment, the PPE gloves worn by paint booth operators, painting suits, and painting respirators are dry when disposed and are managed as non-RCRA hazardous waste, based upon product and process knowledge. This HW determination may require modification, based upon the HW determination conducted for the waste Stratum White Primer waste stream discussed above. Mr. Mr. Clinger stated that Collision solutions generates approximately 750 waste disposable wipes monthly, one paint suit every three weeks, one set of respirator cartridges every two to three weeks, and approximately five sets of PPE nitrile gloves weekly. These wastes are disposed in the general trash.

Waste Plastic Cups/Sand Paper/Masking Tape/Paper and Plastic Sheeting/Buffing Pads: Mr. Clinger stated that Collision Solutions generates approximately 40 RCRA-empty plastic paint mixing cups monthly. He stated that the facility also generates approximately two pounds of sand-paper products, less than one pound of masking tape, and less than 10 pounds of paper and plastic sheeting used to mask vehicles during painting operations. He added that all these waste streams have been determined to be non-RCRA hazardous, by virtue to product and process knowledge, and are disposed in the general trash. This HW determination may require

modification, based upon the HW determination conducted for the waste Stratum White Primer waste stream discussed above.

General Trash: Mr. Clinger stated that Collision Solutions generates approximately nine cubic yards of general trash weekly. The general trash consists of waste office paper, lunch wastes, and miscellaneous cardboard and packing materials. Mr. Clinger 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 weekly by Ankeny Sanitation, 7002 SE Delaware Avenue, Ankeny, Iowa, and transported off-site to the South Dallas County Landfill located in Adel, Iowa for sanitary landfill disposal.

Waste Floor Dry: Mr. Clinger stated that a commercial floor dry product similar to "kitty litter" is used during weekly facility cleanings. He stated that the waste floor dry has been determined to be non-RCRA hazardous, by virtue of product and process knowledge. This HW determination may require modification, based upon the HW determination conducted for the waste Stratum White Primer waste stream discussed above. He added that the facility generates approximately two pounds of this waste stream weekly. The waste floor dry is disposed in the general trash.

Scrap Metal: Mr. Clinger stated that Collision Solutions generates between 300- 500 pounds of scrap metal monthly. The scrap metal has been determined to be non-RCRA hazardous, by virtue of product and process knowledge. The scrap metal is stored outside the facility and is picked up and transported off-site periodically by Eivins Salvage and Recycling (Eivins), (515) 468-8442 for recycling.

Waste Fluorescent Lamps: Mr. Clinger stated that he has not generated any waste fluorescent lamps since he has owned the facility. However, he added that he will manage waste fluorescent lamps generated in the future as HW. He stated that he will transport the HW lamps to the Metro Hazardous Waste Drop Off, 1105 Prairie Drive, Bondurant, Iowa, for recycling.

UW-Batteries: Mr. Clinger stated that rechargeable batteries are episodically generated on-site and are transported to the Metro Hazardous Waste Drop Off, 1105 Prairie Drive, Bondurant, Iowa, for recycling.

Waste Lead-Acid Batteries: Mr. Clinger stated that waste lead-acid batteries are episodically generated on-site and are exchanged for new batteries at Interstate All Battery Center, Ankeny, Iowa. Based upon Mr. Clinger'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.

Waste Aerosol Cans: Mr. Clinger stated that Collision Solutions generates approximately 10 RCRA-empty waste aerosol cans monthly. The waste aerosol cans include waste spray paint cans, lubricants, glass cleaner, and similar automotive detailing products. The empty waste aerosol cans are either managed as scrap metal or disposed in the general trash.

Waste Parts Washer Solvent: Mr. Clinger stated that Collision Solutions purchased a parts washer for use in the shop area when the facility opened. However, he stated that the parts washer was never used and does not contain any parts washer solvent.

Process Wastewater: Mr. Clinger stated that vehicles are washed in the wash bay (Attachment 2) using a pressure washer and commercial truck pressure wash detergent product (Attachment 15). Mr. Clinger stated that the pressure washer and detergent product are used to clean vehicles before and after repair. A trap collects dirt and debris in the floor drain located inside the wash bay. Mr. Clinger had been informed that the trap was cleaned approximately two years ago by Rogers Septic Maintenance and Repair, 401 NE 52nd Avenue, Des Moines, Iowa. It is his understanding that the dirt and debris removed from the trap was non-RCRA hazardous, by virtue of product and process knowledge. Mr. Clinger stated that he was not aware of the amount of dirt and debris that was removed from the trap at that time but added that he has not cleaned out the trap since he has owned and operated the facility.

Waste Blast Media: Mr. Clinger stated that a small abrasive blaster is used infrequently to remove rust and scale from small parts. He stated that the blasting media used in the blasting unit is Menard's "Black Blast" abrasive blasting crystals, identified by Menard's as "coal slag." Mr. Clinger stated that the blaster was last used approximately six months ago to clean rust from a part being prepared for painting. He stated that he has not disposed of any waste blast media since opening the facility, slightly more than a year ago. He stated that if/when waste blast media is no longer viable and needs to be disposed, he will conduct a HW determination of the waste.

4.4 Visual Inspection of Facility Waste Stream Management

A visual inspection of the facility 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 16.

I observed one large painting booth in use during this CEI. I observed a trash receptacle located inside the paint mixing area, shown in Photo 1 and Attachment 2. I observed an empty plastic paint mixing cup and one or two waste paper disposable wipes in the bottom of the trash receptacle (Photo 2, Attachment 2). I confirmed with Mr. Clinger that the waste disposable wipes were used to clean the paint guns and equipment inside the paint mixing area. During my preparation of this report, I reviewed product specifications of the paint and solvent products used by Collision Solutions. It appears that the product used to clean paint guns and the thinner product used to clean the paint gun hoses would most likely produce a combined waste stream that should be managed as F003 and F005 listed HW. Therefore, the paper disposable wipes used to clean the paint guns and painting equipment would at a minimum exhibit the F005 HW listing. **Collision Solutions must conduct an adequate waste determination of the waste paper disposable wipes and other PPE contaminated with the waste paint gun solvent and paint thinner in accordance with the provisions of 40 CFR §262.11 (NOPF added after the CEI).**

I observed a paint gun parts washer shown in Photo 3, Attachment 2. Mr. Clinger explained that the Naked Gun product is recirculated through the paint gun washer until the product is no longer viable. When the product is no longer viable, the solvent reservoir located beneath the parts washer cabinet is emptied into the 55-gallon drum of paint/solvent waste. New Naked Gun solvent product is then added to the reservoir and the process repeats.

I observed one closed 55-gallon drum, approximately one-third full, described by Mr. Clinger as "paint-related waste." The paint related waste consisted of waste paint, waste thinner, and waste Naked Gun paint gun solvent. The 55-gallon drum was in good condition and closed. Mr. Clinger stated that the 55-gallon drum contained HW that was managed and manifested off-site as D001, D018, D035, D039, D040 characteristic and F003 and F005 listed HW. However, the labels affixed to the drum did not identify the drum's contents as "Hazardous Waste, nor the nature of the contents (Photo 4, Attachment 2). I provided compliance assistance and best practices commentary on labeling the container to better describe the HW contents and nature of the liquids stored therein.

I observed scrap metal stored outside the facility (Photo 5, Attachment 2). Mr. Clinger stated that scrap metal generation varied, based upon business cycles. The scrap metal is picked up and transported off-site by Eivins for recycling.

I observed a small abrasive blasting unit as shown in Photo 6, Attachment 2. Mr. Clinger stated that he has not used the abrasive blasting unit for "more than six months" and if/when used, the unit is not used to remove paint from metal objects. Rather, the blasting unit is used to remove rust and scale from small parts that are being prepared for painting.

I observed a pressure washing unit and a container of commercial pressure washing concentrate inside the wash bay and shown in Photos 7 and 8, Attachment 2. I observed the floor drain and trap located in the wash bay and shown in Photo 9, Attachment 2.

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

4.5 Documentation

Prior to this CEI, I reviewed 29 electronic uniform hazardous waste manifests (UHWM) generated at this facility, spanning the period of July 11, 2018, to present. The facility was operating as a small quantity generator (SQG) of more than 100 kg of HW generated monthly under previous ownership. However, the facility has generated less than 100 kg of HW monthly since Mr. Clinger purchased the facility in January 2021, as documented in the following UHWM:

UHWM#	DATE	Description	QTY	Unit	EPA Waste Codes
007490690SKS	3/1/2021	UN 1263, Waste Paint Related Material	1	DM	D001, D018, D035, D039, D040, F003, F005

008233904SKS	8/24/2021	UN 1263, Waste Paint Related Material	1	DM	D001, D018, D035, D039, D040, F003, F005
008377949SKS	12/15/2021	UN 1263, Waste Paint Related Material	1	DM	D001, D018, D035, D039, D040, F003, F005

I did not observe any discrepancies with the shipping documentation/manifests maintained by the facility.

5.0 SUMMARY

The following findings were documented during the RCRA CEI previously conducted August 18, 2005, when the facility was inspected as a conditionally exempt small quantity generator (CESQG) of HW:

NOPF No. 1 – Failure to label containers of HW [40 CFR §262.34(c)(1)(ii)]. It is not clear why this finding was documented, insofar as the facility was inspected as a CESQG.

NOPF No. 2 – Failure to make a waste determination of spent paint booth filters [40 CFR §262.11].

I documented the following preliminary findings after this CEI:

NOPF #1: Conduct an adequate waste determination on the waste stream(s) generated containing the Stratum White Urethane Primer Pt A product, in accordance with 40 CFR §262.11.

NOPF #2: Conduct an adequate waste determination of all wipes, PPE, and other items contaminated with waste paint gun solvent and waste paint thinner, in accordance with 40 CFR §262.11.

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) Digitally signed by HURLEY BRYANT (Affiliate) Date: 2022.03.10 14:03:51 -06'00' Date: 3/10/2022

H. D. "Doug" Bryant, CPP, PCI
Civil Investigator, NOWCC/SEE

AMBER WHISNANT Digitally signed by AMBER WHISNANT Date: 2022.04.18 21:23:07 -05'00' Date: _____

Amber Whisnant
Chief, RCRA Section, Chemical Branch
Enforcement and Compliance Assurance Division

Attachments:

1) Business Cards (1 page)
2) Site Map/Diagram (1 page)
3) Confidentiality Notice (1 page)
4) Receipt of Document and Samples (1 page)
5) Notification Acknowledgement/Verification Report (1 page)
6) Safety Data Sheet (SDS), Primer, Non-Iso Productive (14 pages)
7) SDS, Stratum White Urethane Primer (11 pages)
8) SDS, Multi-Thane 330 High Solids Acrylic Polyurethane Deep Base (11 pages)
9) SDS, Imron Elite-S/S (15 pages)
10) SDS, Power Tint Medium Temperature Reducer (14 pages)
11) SDS, Elite Medium Activator (12 pages)
12) SDS, Imron Elite Clearcoat (14 pages)
13) SDS, Thinner (16 pages)
14) SDS, Naked Gun VOC Compliant Gun Cleaner (7 pages)
15) SDS, MALCO Dirt Blaster Truck Wash (8 pages)
16) Photo Log (1 page) and Visual Inspection Photos (9 pages)
17) Email thread, RE: Product Specification/Question? Dated 3/9/2022 (2 pages)