

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

Curries Division of AADG Inc.

1502 12th Street NW
Mason City, IA 50401
(641) 494-2963

EPA ID Number: IA0000362905

On

February 22, 2022

By

Eastern Research Group, Inc.

For

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/Chemical Branch/RCRA Section (ECAD/CB/RCRA) of the U.S. Environmental Protection Agency (EPA) Region 7, Eastern Research Group, Inc. (ERG) conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Curries Division of AADG Inc. (Curries) in Mason City, Iowa on February 22, 2022. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. Throughout the CEI, data and information were collected to determine compliance with the applicable regulatory and statutory requirements. The inspection report and attachments present the results of the CEI.

2.0 PARTICIPANTS

Curries Division of AADG Inc.:

David Bill, Engineering Manager

Heidi Marquardt, Continuous Improvement and Sustainability Manager

EPA Representative, ERG:

Janosh Wolters, Energy Engineer

3.0 INSPECTION PRECEDURES

After arriving unannounced at Curries at approximately 09:10, I performed a drive-by visual inspection of the facility and took a photograph before beginning the inspection and did not note any areas of concern. I then entered the main entrance and signed into the facility's visitor's log. I was greeted by the engineering manager, David Bill. I introduced myself and presented my inspector credentials to Mr. Bill and explained my reason for being on site is to conduct a RCRA CEI and asked to meet with the facility personnel who manage hazardous waste on site. Mr. Bill stated Ms. Marquardt would best assist me, and he phoned Ms. Marquardt and informed her that I was on site. Mr. Bill explained Curries requires all visitors to sit through a brief safety training. After the conclusion of the safety briefing, Mr. Bill led me to a conference room to begin the opening conference at approximately 09:45. Mr. Bill introduced me to Ms. Marquardt and stated that she would be the facility representative for the remaining of the inspection. I initiated the opening conference with Ms. Marquardt, the facility's Continuous Improvement and Sustainability Manager as Curries' representative. I presented Ms. Marquardt with my inspector credentials and business card, as well as the business card of the EPA Task Order Contracting Officer Representative, Mr. Trevor Urban. I then presented a copy of RCRA Section 3007(a), which contains EPA's inspection authority. I explained my need to collect accurate information and presented them with a copy of Title 18 U.S. Code, Sections 1001 and 1002. I then presented Ms. Marquardt with a copy of the *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections* and reviewed Curries' confidentiality rights. I informed Ms. Marquardt that I would provide a *Confidentiality Notice* at the end of this inspection.

The inspection consisted of 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. Ms. Marquardt provided a facility layout (see Attachment 1) and explained facility operations and locations of hazardous waste generation and management.

During the visual inspection of the facility, Ms. Marquardt guided me throughout the facility in order to conduct thorough evaluations of the facility's satellite accumulation areas (SAAs) and central accumulation area (CAA). At the time of the inspection, the facility was operating four SAAs and one CAA. The facility also handles universal waste lamps and batteries in two separate designated areas on site as shown on the facility layout. The universal waste storage areas were visually inspected. Curries does not use parts washers on site. I conducted an in-depth visual inspection of the SAAs, the CAA, the universal waste storage area, used oil storage area, and all manufacturing areas.

Nine photographs were collected as inspection documentation and are shown in Attachments 2 and 3. Information collected during the inspection is documented on the *EPA Inspection Checklist* (see Attachment 4). I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.01D), unless noted differently. At the conclusion of the inspection, I provided Ms. Marquardt with a *Confidentiality Notice, Receipt for Documents and Samples*, and a *Notice of Preliminary Findings (NOPF)* which she signed as acknowledgement of receipt (see Attachments 5, 6, and 7 respectively). No confidentiality claims were made by Curries.

The following inspection documents and compliance assistance handouts were left with Curries:

RCRA Section 3007(a)
Title 18 U.S. Code, Sections 1001 and 1002
Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections
Confidentiality Notice (Facility copy)
Receipt of Documents and Samples (Facility copy)
NOPF (Facility copy)
Instructions for Responding to a NOPF
Security Awareness
Commercial Motor Vehicle Transportation
Security Planning
EPA E-Manifest Fact Sheet U.S.
EPA Small Business Resources
U.S. EPA Publication, Managing Your Hazardous Waste
U.S. EPA Publication, Managing Used Oil-Advice for Small Businesses
PowerPoint Presentation, 2013 Solvent Wipes Final Rule
Pollution Engineering Article, 10 Common Questions for Waste Generators
Iowa Department of Natural Resources (IDNR) Waste Exchange Folder and P2 Brochures
IDNR Management of Fluorescent Lamps for Businesses Information Sheets
IDNR Aerosol Can Disposal for Businesses Information Sheet
University of Northern Iowa Waste Reduction Center Information Card
Solvent-Contaminated Wipes Final Rule Summary Chart

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

Curries began operating in 1998 and currently employs approximately 500 people. The facility operates on a five day, 24-hour shift schedule. Occasionally, certain employees are offered to work overtime on a Saturday if manufacturing demands must be met. The facility has a footprint of approximately 372,000 square feet. Curries' operations consist of manufacturing metal doors and door frames. The primary raw materials used are steel, solvents, and paints. The major manufacturing or processing operations that generate waste streams include manufacturing steel steel doors, steel door frames, and painting operations. The following waste streams are produced: waste paint/stain related material, still bottoms, solvent contaminated wipes, aerosol can residuals, paint booth filters, wastewater treatment plant (WWTP) filter cake, process wastewater, scrap metal, used oil, used oil filters, universal waste lamps, universal waste batteries, and general trash. In addition, the facility manages hazardous secondary material that is reclaimed on site.

4.2 RCRA Status

According to the *Hazardous Waste Site Info Verification Report for Inspector* (see Attachment 8), Curries notified as a federal Large Quantity Generator (LQG) of D001, D005,

D035, D039, F003, and F005 hazardous wastes. I asked Ms. Marquardt to review the *Hazardous Waste Site Info Verification Report for Inspector*, which I provided prior to records review and visual inspection of the waste generation areas. Ms. Marquardt requested I update the facility contact information and to remove the D005 waste code. In addition, Ms. Marquardt explained the facility is owned and operated by Assa Abloy and the facility is only operating under the name Curries because a name change was not desired. There has not been a change in ownership since the last RCRA CEI on site. The remaining information on the form was accurate to the best of her knowledge. After reviewing the records and walking through the facility, I determined that the facility is operating as a federal LQG of D001, D035, D039, F003, and F005 hazardous wastes, a generator of used oil, and a small quantity handler (SQH) of universal waste. Curries generates more than 1,000 kilograms of hazardous waste monthly based on a review of facility records, a visual inspection of process and waste management areas, and interviewing personnel.

Curries was previously inspected by an EPA contractor on May 5 and 6, 2016. The inspection led to a NOPF. The findings included a failure to label SAA containers with the words “hazardous waste”, failure to keep SAA containers closed, failure to label a CAA container with the words “hazardous waste”, failure to label a CAA container with an accumulation start date, failure to conduct weekly inspections of the CAA, and failure to accumulate universal waste lamps in closed containers. Additional NOPF findings included failure to label universal waste lamps with the words “universal waste lamps”, failure to label universal waste batteries containers with the words “universal waste batteries”, failure to date or otherwise track universal waste accumulation times, failure to inform employees of universal waste management and handling requirements, and failure to provide annual hazardous waste training. At the time of my inspection, I had the following repeat findings:

NOPF 1 – Accumulating universal waste for longer than one year. [40 CFR 273.15(a)].

NOPF 3 – Failure to refresh hazardous waste training annually. [40 CFR 262.17(a)(7)(iii)].

Curries responded by correcting issues from the previous inspection and no enforcement actions were taken.

4.3 Facility Waste Streams and Management

A Waste Stream and Waste Handling Table for Curries is presented below. The table describes waste streams generated, generation process/rates, hazardous waste determinations, and on-site/off-site management.

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#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
1	Hazardous Secondary Material (HSM) (Notification included in Attachment 9)	Flushing paint lines with MEK and reclaiming flushed MEK	Exempted Waste (based on process knowledge and knowledge of the product) (exemption for reclamation per 40 CFR § 261.4(a)(23))	53,655 pounds per year	55-gallon containers	Distilled on site
2	Waste Paint/Stain Related Material (Waste Profile included in Attachment 10)	Flushing automated paint lines and cleaning manual paint/stain guns	D001, D035, F003, F005 (based on process knowledge and knowledge of the product)	10,000 pounds per year	55-gallon containers in SAAs #2 and #3 before transferred to CAA	Transported by Clean Harbors Environmental Services, Inc. in Norwell, MA (MAD039322250) to Pioneer Tank Lines in Afton, MN (MND044176113) to destination facility Clean Harbors Environmental Services, Inc. in Kimball, NE (NED981723513) for incineration

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
3	Still Bottoms (Waste Profile included in Attachment 11)	Still bottoms generated from distillation process	D035, F005 (based on process knowledge and knowledge of the product)	29,000 pounds per year	55-gallon container in SAA #4	Transported by Clean Harbors Environmental Services, Inc. in Norwell, MA (MAD039322250) to Pioneer Tank Lines in Afton, MN (MND044176113) to destination facility Clean Harbors Environmental Services, Inc. in Kimball, NE (NED981723513) for incineration

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
4	Aerosol Can Residuals (Waste Profile included in Attachment 12)	Puncturing RCRA empty aerosol cans	D001, D039, F003, F005 (based on process knowledge and knowledge of the product)	Less than four inches per year	55-gallon container in SAA #1	Transported by Clean Harbors Environmental Services, Inc. in Norwell, MA (MAD039322250) to Pioneer Tank Lines in Afton, MN (MND044176113) to destination facility Clean Harbors Environmental Services, Inc. in Kimball, NE (NED981723513) for incineration
	See Section 4.7 of this report for an explanation on why this waste stream was managed as F listed hazardous waste.					
5	Solvent Contaminated Wipes	Wiping excess MEK off cleaning paint guns, wiping off metal doors and frames	Exempted (managed as nonhazardous waste per 40 CFR 261.4(b)(18))	One 55-gallon container per month	5-gallon containers consolidated into 55-gallon container	LJP Waste Solutions in Saint Peter, MN (MND010468114) for energy recovery

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
6	Lacquer Thinner Wipes	Wiping off excess lacquer thinner from doors	Facility determined nonhazardous but it appeared the wipes could potentially be hazardous for D001, F003, and F005 (based on process knowledge and knowledge of the product)	Unknown (not tracked and added to general trash)	55-gallon container and transferred into 20-yard general trash container	Absolute Waste in Mason City, IA to the landfill of North Iowa in Clear Lake, IA for landfill
	See Section 4.5 for more information on how this waste stream is managed and generated. The following finding was left with the facility for this waste stream: NOPF 3 – Failure to make an adequate waste determination. [40 CFR 262.11(a)].					
7	Paint Booth Filters	Exchanging dried paint booth filters out	Nonhazardous (based on process knowledge and knowledge of the product)	Exchanging dried paint booth filters out once per week	20-yard container	Absolute Waste in Mason City, IA to the landfill of North Iowa in Clear Lake, IA for landfill
8	WWTP Filter Cake (Analytical Report included in Attachment 13)	WWTP operations	Nonhazardous (based on process knowledge and knowledge of the product)	Unknown – not tracked	5-yard container next to WWTP	Absolute Waste in Mason City, IA to the landfill of North Iowa in Clear Lake, IA for landfill

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
9	Process Wastewater (Discharge agreement included in Attachment 14)	Cleaning doors and frames with water prior to painting	Nonhazardous (based on process knowledge and knowledge of the product)	Unknown – not tracked and discharge agreement does not state a maximum allowed amount	Sent to on-site WWTP for pH adjustment and discharged to Mason City Publicly Owned Treatment Works (POTW) in Mason City, IA for treatment	Mason City Publicly Owned Treatment Works (POTW) in Mason City, IA for treatment
10	Used Oil (Invoice included in Attachment 15)	Facility maintenance	Exempted (managed as used oil per 40 CFR 279)	500 gallons per year	275-gallon containers	C & D Oil Services of Waseca LLC in Waseca, MN (MNT280011669) for recycling
11	Used Oil Filters	Punctured and hot drained oil filters	Excluded/not a solid waste (based on process knowledge and knowledge of the product)	One 55-gallon container per year	55-gallon container	C & D Oil Services of Waseca LLC in Waseca, MN (MNT280011669) for recycling
12	Scrap Metal	Facility operations	Nonhazardous (based on process knowledge and knowledge of the product)	40-yard container picked up weekly	40-yard container	Alter Metal Recycling in Des Moines, IA (IAD981501695)

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
13	Universal Waste Lamps (Invoice included in Attachment 16)	Facility maintenance	Exempted (managed as universal waste per 40 CFR 273)	One 4-foot container per year	4-foot container	LJP Waste Solutions in Saint Peter, MN (MND010468114) for recycling
14	Universal Waste Batteries	Facility maintenance	Exempted (managed as universal waste per 40 CFR 273)	One 10-gallon container per year	10-gallon container	LJP Waste Solutions in Saint Peter, MN (MND010468114) for recycling
15	General Trash	Facility operations	Nonhazardous (based on process knowledge and knowledge of the product)	Approximately 47 tons per year	20-yard container	Absolute Waste in Mason City, IA to the landfill of North Iowa in Clear Lake, IA for landfill

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4.4 Less-Than-90-Day Hazardous Waste Accumulation Area

Curries has one Less-Than-90-Day CAA on site, which is located in the painting mix room and is labeled “CAA” on the facility layout (see Attachment 1). The CAA is separate from where paint is mixed. Ms. Marquardt explained the CAA is located in this room because it is an intrinsically safe area. I was not able to take a photograph of inside the room because the facility did not allow electronics inside the room. Therefore, no photographs were taken of this area. I visually inspected the CAA and observed a total four 55-gallon containers of waste paint related material. In addition, I observed three 55-gallon containers of MEK labeled “MEK Pending Reclamation”. The MEK containers were located next to the facility’s distillation unit which was located in the northeastern corner of the room. See Section 4.6 of this report for more information on the management of HSM’s on site. The CAA is located on the northwestern portion of the room. I also observed SAA #4 next to the facility’s distillation unit which contained a 55-gallon container filled approximately with 40 gallons of still bottoms hazardous waste. See Section 4.5 of this report for more information on management of SAAs on site. All central accumulation hazardous waste containers were closed, in good condition, labeled with the indication of the nature of the hazard, labeled with an accumulation start date, and labeled with the words “Hazardous Waste”. The earliest accumulation start date observed was “12/27/2021” on a 55-gallon container of waste paint related material. December 27, 2021 is within 90 days from the time of the inspection.

I observed adequate aisle space to allow for container inspections and access in the event of a spill. The floor of the CAA was sloped towards a blind sump that would need to be manually pumped out in case of a spill. I observed spill control equipment, and related safety equipment within the CAA. Operators handling hazardous waste are trained to use their two-way radio system in case of emergencies. I asked Ms. Marquardt if the facility inspected the CAA. Ms. Marquardt stated the facility inspected the CAA at least weekly and had weekly inspection logs.

During records review, Ms. Marquardt provided inspection logs for the CAA. I reviewed the logs and it appeared the facility was adequately performing weekly inspections of the CAA. An example of a CAA log is provided in Attachment 17.

I did not note any issues or findings at the CAA during the inspection.

4.5 Satellite Accumulation Areas

I observed four satellite area during the visual inspection. The table below shows the SAA name or location, waste type, volume of waste observed, and container type.

SAA #	SAA Name or Location	Waste Type	Volume of Waste	Container Type
1	Aerosol Can Puncture Unit	Aerosol Can Residuals	Less than 4 inches	55-gallon drum
2	Primer Stain/Paint Booth	Waste Paint Related Material	20 gallons	55-gallon drum
3	Topcoat Stain/Paint Booth	Waste Paint Related Material	15 gallons	55-gallon drum
4	Distillation Unit	Still Bottoms	40 gallons	55-gallon drum

During the visual inspection, I visually inspected all containers in all SAAs. The hazardous waste accumulation containers observed in the facility SAAs were in good condition, closed, labeled with the indication of the nature of the hazard, and labeled with the words “Hazardous Waste”. One photograph was taken of the 55-gallon SAA container in SAA #1 as an example on how SAA containers are managed on site (see Attachment 3, Photo 2).

I reviewed the management of the SAAs, and no additional issues or findings were noted.

During the visual inspection of the SAAs, I observed paint/stain operator, Bill Bamrick use a rag to wipe down a door. I asked Mr. Bamrick how rags in the staining area are used. Mr. Bamrick stated rags are used to wipe off lacquer thinner from manufactured doors. I then observed a 55-gallon container labeled “Acetone” and asked Mr. Bamrick how the facility uses acetone. Mr. Bamrick stated the acetone is used as a thinner for small batch painting operation and that manual paint guns are cleaned using only MEK. Ms. Marquardt provided the SDS for acetone during records review and is included in Attachment 18. I asked Ms. Marquardt and Mr. Bamrick how these rags are managed. Mr. Bamrick stated the rags are placed in a 55-gallon container that is emptied into the general trash as needed. Mr. Bamrick was not sure how often this 55-gallon drum is filled but estimated it is emptied approximately once a week. I asked Mr. Bamrick if he knew the composition of the lacquer thinner or had a SDS nearby. Ms. Marquardt stated she would provide me a SDS once the visual inspection concluded. The SDS for the lacquer thinner used on site is provided in Attachment 19. Ms. Marquardt stated the facility will begin to manage these rags under the solvent-excluded contaminated wipes exclusion. During records review, I reviewed the SDS for the lacquer thinner and it appeared the rags generated could be a D001 and F005 hazardous waste. Therefore, I left the following finding:

NOPF 3 – Failure to make an adequate waste determination. [40 CFR 262.11(a)].

4.6 Hazardous Secondary Material

Prior to the visual inspection, Ms. Marquardt explained the facility manages HSM’s on site. Ms. Marquardt explained the facility uses MEK to flush paint gun lines. During records review,

Ms. Marquardt provided the SDS for MEK which is provided in Attachment 20. I asked Ms. Marquardt how paint gun lines are flushed. Ms. Marquardt explained paint line are attached directly to containers of MEK solvent and are flushed into 55-gallon containers that are labeled “MEK Pending Reclamation”. This occurs for all metal frames and doors that are conveyed and painted by automatic paint lines (see Attachment 3, Photo 6). Ms. Marquardt stated the facility also manually stains and paints doors and frames. This occurs in portion of the facility that is used for small scale products that cannot be painted on the automatic paint line. There is one small topcoat and one small primer booth on site (see Attachment 3, Photo 3). Ms. Marquardt stated the paint waste that is generated at the primer and topcoat booths are not distilled on site and are managed as a D001, D035, F003, and F005 hazardous waste. Ms. Marquardt stated the facility only uses MEK to flush/clean paint lines and therefore, I explained based on the SDS of the MEK being used, the waste paint related material would not need to include the F003 waste code. Ms. Marquardt stated she believed the facility attached the F003 out of an abundance of caution because acetone is used as a thinner for small paint batches. Small paint batches are discussed in detail in section 4.7 of this report. I did not leave a finding regarding the facility over classifying this waste stream.

I observed SAA #2 at the primer stain/paint booth and SAA #3 at the topcoat stain/paint booth. I asked Ms. Marquardt why the facility did not reclaim this material if the same MEK solvent solution was used to clean the manual paint guns. Ms. Marquardt stated the automated paint line flush is “cleaner” and allows the distillation unit to operate properly. During records review, I asked Ms. Marquardt if the facility notified EPA of their management of HSM’s. Ms. Marquardt stated the facility notified EPA and continues to notify EPA of their hazardous waste activities per biennial reporting. Ms. Marquardt provided the facility’s most recent biennial report for 2021 which was submitted just one week prior to the EPA. The HSM re-notification page is provided in Attachment 9. It showed the facility estimated a total of 30 tons of HSM in 2021. During records review, Ms. Marquardt also provided MEK distillation tracking logs and an example is provided in Attachment 21. Still bottoms are generated as a result of using a distillation unit on site. The still bottoms generated from the distillation process are managed in a 55-gallon container in SAA #4. During records review, Ms. Marquardt stated the facility generated approximately 29,000 pounds of still bottoms waste in 2021. I thoroughly reviewed the requirements set forth in 40 CFR 261.4(a)(24) and documented the facility’s HSM activity in the *EPA Inspection Checklist* (see Attachment 4).

4.7 Painting Operations

The facility manages one automated paint line and two small paint/stain booths used for manual painting and staining. During the visual inspection, I observed the automated paint line which carries manufactured parts via a conveyor system through a pressure washer, then into a drier oven, and through the automated painting operations. The process wastewater used in the cleaning prior to painting is managed at the facility’s on-site WWTP. The WWTP is located next to the automated paint line and generates a nonhazardous filter cake waste (see Attachment 3, Photo 5). I asked Ms. Marquardt how the facility determined the waste to be nonhazardous. Ms.

Marquardt stated the facility used process knowledge and analytical testing. During records review, Ms. Marquardt provided an analytical report from a sampling event of the filter cake (see Attachment 13). Ms. Marquardt explained the facility conducts pH adjustment prior to the water being discharged via sanitary sewer to the Mason City POTW in Mason City, IA. The discharge agreement is provided in Attachment 14.

In addition, the facility generates paint booth filters. Ms. Marquardt explained the facility also completed sampling on paint booth filters and provided the analytical results. The analytical report for the paint booth filters is provided in Attachment 22. Attachment 22 includes analytical results from a rarely generated waste stream named paint ash. The facility uses hooks that hold products being painted in the automated painting process. These hooks are occasionally put into the oven and the residual paint on the hooks is baked off and falls onto the ground as an ash. This ash is disposed of in general trash. I did not observe the facility generating any type of this waste during my visual inspection.

During the visual inspection, I observed an aerosol can puncture unit in SAA #1. Ms. Marquardt stated aerosol cans are primarily used on site for touch ups on manufactured products. Ms. Marquardt also stated the maintenance team uses aerosols during maintenance operations. Ms. Marquardt stated if an aerosol can were to break or no longer be usable, the facility would puncture the can immediately. During the visual inspection of the maintenance area, I observed the facility had multiple aerosol cans of a brake cleaner. During records review, I reviewed the SDS for the brake cleaner which is provided in Attachment 23. The brake cleaner contained tetrachlorethylene. The facility manages aerosol can residual waste as a D001, D005, D039, F003, and F005 hazardous waste. I did not observe any aerosol cans on site that when deemed waste would be considered a D005 waste. I asked Ms. Marquardt why the facility managed the aerosol can residuals with the D005 waste code. Ms. Marquardt stated she believed it to be a legacy issue and it would no longer be applicable. In addition, I explained to Ms. Marquardt that based on aerosol cans being commercial products, when punctured, they would not be required to be managed as an F listed hazardous waste. Based on a records review and aerosol cans I observed on site, it appeared the aerosol can residual to be a D001 and D039 hazardous waste. Ms. Marquardt stated she plans on updating the waste profile used to ship aerosol can residuals off site.

I did not note any issues or findings with the facility's painting operations.

4.8 Solvent Contaminated Wipes

During the visual inspection, I observed a 5-gallon container labeled "Excluded Solvent-Contaminated Wipes" (see Attachment 3, Photo 4). Ms. Marquardt stated the facility generates these wipes by wiping off small amounts of MEK off manufactured doors and frames during touch up operations. Ms. Marquardt stated the facility ensures that no free liquids are present when the rags are shipped off site for energy recovery. The facility manages 5-gallon containers throughout the final preparation area outside of the automated paint line and consolidate the

containers in one 55-gallon container which would be staged in the CAA. During the visual inspection, I did not observe a 55-gallon container in the CAA. Ms. Marquardt stated only one 55-gallon container is generated per month and a new one has not been placed in the CAA. LJP Waste Solutions manages the waste off site. I thoroughly reviewed the requirements set forth in 40 CFR 261.4(b)(18) and documented the facility's excluded solvent contaminated wipes activities in the *EPA Inspection Checklist* (see Attachment 4).

4.9 Universal Waste Accumulation Area

Curries manages universal waste in two locations in the facility as shown on the facility layout (see Attachment 1). During the visual inspection, I observed one 4-foot container of universal waste lamps on site (see Attachment 3, Photo 8) located in the electrical maintenance area. In addition, I observed one 10-gallon container of universal waste batteries in the maintenance tool area. Both containers were labeled either "Universal Waste Lamps" or "Universal Waste Batteries". The earliest accumulation start observed was "10/28/2021" on the 4-foot container of universal waste lamps. During records review, I observed invoices for universal wastes shipped off site. LJP Waste Solution manages all universal waste off site. An example of an invoice for universal waste lamps is provided in Attachment 16.

I reviewed the management of both universal waste storage areas at the facility and no issues or findings were noted.

4.10 Used Oil

I visually observed the used oil storage areas located throughout the facility. The facility manages used oil in two 275-gallon intermediate bulk containers (see Attachment 3, Photo 7). Both used oil containers were closed and labeled with a nonhazardous waste label with the words "Used Oil". Ms. Marquardt explained the used oil is shipped off site to C & D Oil Services of Waseca LLC in Waseca, MN (MNT280011669) for recycling. An invoice is provided for off-site shipments as an example in Attachment 15.

I did not note any issues or findings at the used oil storage area.

4.11 Other Regulatory Requirements

Preparedness, Prevention, and Emergency Requirements - Safety and emergency equipment were present and in satisfactory condition in areas throughout the facility, including the hazardous waste CAA (as noted in Section 4.4 of this report). Appropriate arrangements and coordination were made with necessary State and local emergency agencies.

I reviewed the preparedness, prevention, and emergency requirements and no issues or findings were noted.

Contingency Planning Requirements - The contingency plan (see Attachment 24) was on file electronically and in a binder and was reviewed while on site. The contingency plan included a

complete emergency evacuation plan, a list of emergency response equipment and describes their capabilities. The plan also included emergency response procedures, emergency coordinators and contact information. The facility did not have quick reference guide prepared. The contingency plan was most recently revised on 12/20/2021. I asked Ms. Marquardt why the facility had not prepared a quick reference guide. Ms. Marquardt was not aware that it would be a requirement to prepare a quick reference guide. Therefore, I left the following finding:

NOPF 1 – Failure to prepare a quick reference guide. [40 CFR 262.17(a)(6)→262.262(b)].

I continued reviewing the contingency plan and noted the facility submitted the contingency plan to local emergency response agencies including the local police department, fire department, and hospital. I reviewed the entire RCRA contingency plan and no additional issues or findings were noted.

Personnel Training Requirements – Personnel are to be trained to perform hazardous waste duties, and new employees are to be trained within six months of start. The training, at a minimum, must be designed to ensure personnel at Curries are able to manage hazardous waste relevant to the positions in which they are employed and respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including:

1. Procedures for using, inspecting, repairing, and replacing facility emergency equipment
2. Communications and alarm systems
3. Response to fires or explosions

Upon reviewing the hazardous waste training employees of Curries receive, it appeared the training to be sufficient. I asked Ms. Marquardt which employees manage hazardous waste on site. Ms. Marquardt explained the personnel responsible for managing hazardous waste on site and I reviewed training records for these individuals. Ms. Marquardt explained the facility uses an excel spreadsheet that tracks job descriptions, employees, and training attendance. I observed the primary emergency contact, Amy Schmitt as listed in the contingency plan attended training on 12/8/2021 but the secondary emergency coordinator, David Bill did not have a training record for 2019, 2020, or 2022. The training records for Amy Schmitt is included in Attachment 25 as an example. I asked why David Bill, as an emergency coordinator listed in the contingency plan had not attended yearly annual hazardous waste refresher training. Ms. Marquardt stated this must have been overlooked. In addition, Ms. Marquardt explained she teaches the class yearly and this is how she completes her annual training requirement. The facility's secondary emergency coordinator, David Bill had not attended annual hazardous waste training and therefore, I left the following finding:

NOPF 2 – Failure to refresh hazardous waste training annually [40 CFR 262.17(a)(7)(iii)].

I reviewed the personnel training requirements, and no other findings were noted.

Manifest and Land Disposal Restriction (LDR) Requirements – Curries maintained records of manifests on site at the time of inspection dating back three years. Curries generated

approximately 36 hazardous waste manifests over the last three years. I reviewed all hazardous waste manifests. A manifest of hazardous waste generated on-site and corresponding LDR are provided in Attachment 26 as an example.

I reviewed all other manifest and LDR requirements and no addition issues or findings were noted.

5.0 SUMMARY OF FINDINGS

NOPF 1 – Failure to prepare a quick reference guide. [40 CFR 262.17(a)(6)→262.262(b)].

During records review, I observed the facility did not have quick reference guide prepared. Ms. Marquardt stated she was not aware this was a requirement.

NOPF 2 – Failure to refresh hazardous waste training annually [40 CFR 262.17(a)(7)(iii)].

The facility's secondary emergency coordinator, David Bill had not attended annual hazardous waste training in 2019, 2020, or 2021.

NOPF 3 – Failure to make an adequate waste determination. [40 CFR 262.11(a)].

The facility uses rags with lacquer thinner to clean off manufactured doors and frames. The facility manages these rags as a nonhazardous waste and disposes of the rags in general trash. I reviewed the SDS for the lacquer thinner and it appeared the rags generated could be a D001 and F005 hazardous waste.

I observed no issues or findings during this inspection. However, further EPA review may add findings.

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Janosh
Wolters

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Janosh Wolters
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Janosh Wolters
Energy Engineer
Date: April 19, 2022

AMBER
WHISNANT

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WHISNANT
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Amber Whisnant
Section Chief
ECAD/CB/RCRA, EPA Region 7
Date: _____

Attachments:

1. Facility Layout (1 page)
2. Curries Photolog (1 page)
3. Curries Photos (9 photos/10 pages)
4. EPA Inspection Checklist (50 pages)
5. Confidentiality Notice (1 page)
6. Receipt for Documents and Samples (1 page)
7. Notice of Preliminary Findings (1 page)
8. Hazardous Waste Site Info Verification Report for Inspector (2 pages)
9. HSM Notification (1 page)
10. Waste Paint & Stain Related Material Waste Profile (3 pages)
11. Still Bottoms Waste Profile (5 pages)
12. Aerosol Can Residuals Waste Profile (5 pages)
13. Filter Cake Analytical Report (12 pages)
14. Wastewater Discharge Agreement (21 pages)
15. Used Oil Invoice (1 page)
16. Universal Waste Lamps Invoice (1 page)
17. CAA Log (1 page)
18. Acetone SDS (7 pages)
19. Lacquer Thinner SDS (15 pages)
20. MEK SDS (12 pages)
21. MEK Distillation Log (1 page)
22. Paint Booth Filter Analytical (19 pages)
23. Break Cleaner SDS (9 pages)
24. Contingency Plan (55 pages)
25. Training Records (1 page)
26. Manifest (3 pages)

Notice of Preliminary Findings

(For Contractor Use Only)

Facility Name: Curries Division of AADG Inc
Facility Address: 1502 12th St NW
Mason City, IA 50401
EPA ID#: IA0000362905 Date: 02/22/2022

Notice: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for the EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to the EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and will make determinations as to what violations may have occurred at your facility.

Citation

Description of Finding

- | | |
|------------------------------------|--|
| 1. 40CFR 262.17(a)(6) → 262.262(b) | 1. Failure to prepare a guide reference guide. |
| 2. 40CFR 262.17(a)(7)(iii) | 2. Failure to refresh hazardous waste training annually. |
| 3. 40CFR 262.11(a) | 3. Failure to make an adequate waste determination. |
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If you have any questions about this Notice or wish to discuss your response, you may call me at 484-678-8675, or Trevor Urban (Compliance Officer) at 913-551-7133.

This Notice prepared by Janosh Walters Date: 02/22/2022

The undersigned person hereby acknowledges receipt of this Notice and has read the same.

Printed Name: HEIDI MARQUARDT Date: 2/22/22
Signature: Heidi Marquardt
Title: CI AND SUSTAINABILITY MANAGER

Page 1 of 1

(Rev: 2/26/2020)

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