

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

ADVANCED HEAT TREAT CORPORATION

2839 Burton Avenue
Waterloo, Iowa 50703
319-291-3384

EPA ID Number: IAD056504186

On

August 13, 2024

By

TOEROEK ASSOCIATES, INC.

For

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region 7

Enforcement and Compliance Assurance Division

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, Toeroek Associates, Inc., and its subcontractor CLAENE Group (Toeroek team) conducted a hazardous waste compliance evaluation inspection (CEI) at Advanced Heat Treat Corporation (AHT) at 2839 Burton Avenue in Waterloo, Iowa. The CEI was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. The CEI covered hazardous waste generator requirements, used oil management, and universal waste requirements, as applicable. This report and its attachments present the results of the CEI.

PARTICIPANTS

AHT:

Adam Kane, Plant Manager
Clay Miller, Maintenance Manager

Toeroek Team:

Clifford Nelles, Inspector, 816-213-5192

INSPECTION PROCEDURES

Prior to the CEI at AHT on August 13, 2024, I conducted a drive-by visual inspection. I did not observe any areas of concern during the drive-by. At approximately 8:05 a.m., I entered the main office and was met by Mr. Kane. I introduced myself to him and explained that I was there to conduct a CEI. Mr. Kane contacted Mr. Miller, then escorted me to a conference room where we were joined by Mr. Miller approximately 5 minutes later. I introduced myself to Messrs. Kane and Miller and explained the purpose and scope of the CEI. I then proceeded to conduct an entry briefing with Messrs. Kane and Miller.

During the entry briefing, I presented my business card and EPA credentials to Messrs. Kane and Miller. I explained the scope and procedures for the CEI. I explained the facility's right to make confidentiality claims for any or all the information obtained and provided a Notice Regarding Proprietary/Confidential Business Information. I stated that at the conclusion of the CEI, Mr. Kane would be presented with a Confidentiality Notice (Notice) with which he could make or not make a claim of confidentiality for the facility. I also provided Messrs. Kane and Miller a copy of U.S. Federal Codes 1001 and 1002, concerning communication of false statements and documents to federal inspectors, and RCRA Section 3007, explaining EPA's inspection authority, both of which they read.

Copies of the following documents were left with Mr. Kane during the inspection:

- RCRA Facility Access Information Sheet
- RCRA Section 3007
- U.S. Federal Codes 1001 and 1002
- Notice Regarding Proprietary/Confidential Business Information
- Notice of Responding to a Notice of Preliminary Findings

The following documents were provided electronically to Messrs. Kane and Miller.

- E-Manifest Fact Sheet: Generators
- Managing your Hazardous Waste: A Guide for Small Businesses
- U.S. EPA Small Business Resources Information Sheet
- Solvent-Contaminated Wipes Final Rule Summary Chart
- IDNR Excluded Solvent-Contaminated Wipes Rule: Management Practices for Wipes, Rags, and Shop Towels
- Recycling Electronics: A Guide for Businesses
- Lead-Based Paint Activities: Handling and Disposal
- Battery Recycling/Disposal
- Management of Fluorescent Lamps for Businesses
- Incompatible Chemicals
- Universal Wastes – Including Aerosol Cans
- TCLP – Toxicity Characteristic Leaching Procedure
- Part 279 Requirements: Used Oil Management Standards
- EPA Region 7 Emergency Response Program
- Chemical Facility Anti-Terrorism Standards
- Iowa Environmental Guide for Businesses

I reviewed the Verification Report (Attachment 1) with Messrs. Kane and Miller during the CEI. Based on this review, I changed the facility's hazardous waste generator status from very small quantity generator (VSQG) to nongenerator on the Verification Report.

I conducted a visual inspection of the facility, accompanied by Messrs. Kane and Miller. After the visual inspection, I reviewed manifest records and safety data sheets (SDSs) for chemicals used at the facility. I prepared and completed a site-specific inspection checklist to document my observations.

At the conclusion of the CEI, I conducted an exit briefing with Messrs. Kane and Miller. During the exit briefing, I provided a Receipt for Documents and Samples, which Mr. Kane signed, acknowledging receipt (Attachment 2). I provided Mr. Kane the Notice, which he signed indicating no confidential business information had been provided (Attachment 3). I also provided Mr. Kane a Notice of Preliminary Findings (NOPF) (Attachment 4), which he signed to acknowledge receipt. A site map obtained during the CEI is included as Attachment 5 and a Google Earth aerial photograph of the facility is included as Attachment 6. The nine photographs taken during the CEI are in Attachment 7, all of which are described in this report.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

AHT began operating in 1981 and employs 56 people who primarily work one of three shifts (7:00 a.m. to 3:00 p.m., 3:00 p.m. to 11:00 p.m., or 11:00 p.m. to 7:00 a.m.) Monday through Friday. AHT primarily performs heat treatment of various types of steel for a variety of customers, such as agricultural equipment and aerospace manufacturers. The major raw materials used are ENTRON-AERO, Quench Oil 1075, Quench 420, Quench 3440 and Quench 90 WB. Copies of the SDS for ENTRON-AERO, Quench Oil 1075, Quench 420, Quench 3440 and Quench 90 WB are included as Attachments 8 through 12.

According to Mr. Kane, the heat treating process involves cleaning the parts in a vapor degreaser then heating the parts in a furnace. Heated parts are dipped in various quench tanks to provide the heat treatment and protections required by customers. AHT previously used trichloroethene (TCE) for degreasing, which generated a listed hazardous waste (F001) when the solvent was changed. The facility converted the degreasing operation to use ENTRON-AERO in 2022. Waste ENTRON-AERO has not yet been generated at the facility and according to the SDS, it would not be hazardous. A copy of the uniform hazardous waste manifest for the last shipment of waste TCE, dated May 4, 2022, is included as Attachment 13. AHT has been a nongenerator of hazardous waste since May 4, 2022.

Current AST operations generate used oil and general trash. Overflow from the quench tanks is routed through an oil skimmer and recovered oil is considered to be used oil. The facility manages used oil according to provisions of Title 40 *Code of Federal Regulations* (40 CFR) Part 279. General trash consists of office and packaging wastes and is considered by the facility to be nonhazardous waste.

Universal waste lamps are not generated since the facility converted all lighting to light emitting diode (LED) fixtures in 2023, with the last shipment of universal waste lamps going out on May 3, 2023. No other universal wastes are generated at AHT.

AHT is located in an industrial area on the west side of Waterloo, Iowa. The facility consists of one building with a footprint of approximately 27,000 square feet of operation including shipping/receiving and production areas and office space.

2. RCRA Status

The Verification Report (Attachment 1) indicates that AHT is registered with EPA, under EPA ID IAD056504186, as a VSQG of hazardous waste (generating less than 100 kilograms [kg] of hazardous waste per calendar month). During the CEI, I determined that AHT is currently operating as a nongenerator of hazardous waste. According to Mr. Kane and manifest records, the facility has been operating as a nongenerator of hazardous waste since May 4, 2022. I inspected AHT as a nongenerator of hazardous waste and a generator of used oil.

3. Waste Streams

This section of the CEI report describes the waste streams generated by the facility, including the facility's waste determination, generation and management processes, and ultimate disposition. The following discussion of waste streams is based on conversations with facility representatives and the visual inspection.

Used oil is generated by the oil skimmer parts washer. The overflow of the quench oil tanks is sent to the oil skimmer parts washer. Used oil captured by the skimmer is containerized and managed as used oil according to provisions of 40 CFR Part 279. AHT generates approximately 150 gallons of used oil per month. Used oil is collected quarterly by Rock Valley Oil and Chemical in Rockford, Illinois, for recycling.

During the CEI I observed a 5-gallon used oil container at the oil skimmer parts washer (Attachment 7, Photograph 1). The used oil container was structurally sound with no leaks or damage, labeled with the words "used oil," and held approximately 2 gallons of used oil.

I also observed two 300-gallon containers (totes) of used oil along the north wall of the facility (Attachment 7, Photographs 2 through 7). The used oil totes appeared to be in good condition with no apparent leaks or damage. One held approximately 100 gallons of used oil and the other held approximately 200 gallons of used oil. Neither used oil tote was labeled with the words "used oil," as required by 40 CFR 279.22(c)(1) (**NOPF No. 1**).

During the CEI, employees of AHT affixed labeling with the words "used oil" to the two used oil totes (Attachment 7, Photographs 8 and 9).

General trash is generated during facility maintenance. The facility has determined that general trash is nonhazardous waste based on product and process knowledge. General trash includes, but is not limited to, floor sweepings, paper, and cardboard packaging. General trash is

transported by Waste Management for disposal at the Black Hawk County Landfill. During the CEI, I observed accumulation of general trash and noted no deficiencies.

4. Summary of Preliminary Findings

In summary, as part of the CEI, I made the following preliminary finding:

- Failure to label two used oil totes with the words “used oil,” as required by 40 CFR 279.22(c)(1) (**NOPF No. 1**).

Other than items specifically noted in the narrative, I observed no additional issues. However, further review by EPA may change or add to my findings.

Clifford A.
Nelles

Digitally signed by Clifford
A. Nelles
Date: 2024.09.23
09:43:50 -05'00'

Clifford A. Nelles, Inspector
CLAENE Group

AMBER WHISNANT

Digitally signed by
AMBER WHISNANT
Date: 2025.02.04
21:23:43 -06'00'

Amber Whisnant, Section Chief
ECAD/CB/RCRA, EPA Region 7

Attachments:

1. Hazardous Waste Site Info Verification Report for Inspector (2 pages)
2. Receipt for Documents and Samples (1 page)
3. Confidentiality Notice (1 page)
4. Notice of Preliminary Findings (1 page)
5. Site Map (1 page)
6. Google Earth Photograph of Facility (1 page)
7. Photographic Documentation (Photolog and 9 Photographs) (7 pages)
8. Copy of SDS for ENTRON-AERO (6 pages)
9. Copy of SDS for Quench Oil 1075 (7 pages)
10. Copy of SDS for Quench 420 (6 pages)
11. Copy of SDS for Quench 3440 (7 pages)
12. Copy of SDS for Quench 90 WB (6 pages)
13. Copy of Manifest for Shipment of Waste TCE Dated May 4, 2022 (1 page)