

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At
Altorfer, Inc.
3888 W. River Drive
Davenport, Iowa 52802
(563) 326-3513, Ext. 4447

EPA ID Number: IAD984591099

On

September 13, 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 Altorfer, Inc. (ALTORFER), located in Davenport, Iowa, on September 13, 2022. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. The facility had not been inspected previously for RCRA compliance. I collected the information and 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

ALTORFER:

Vicki Sigler, Store Coordinator, approximately 25 years with the company and seven years in current role.

Bill Glass, Shop Manager, approximately 29 years with the company and 11 months in current role.

U.S. Environmental Protection Agency (EPA):

H. D. "Doug" Bryant, CPP, PCI, Civil Investigator, SEE, ECAD/Chemical Branch/RCRA Section

3.0 INSPECTION PROCEDURES

Prior to beginning the inspection, I conducted a visual reconnaissance of ALTORFER on September 13, 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 ALTORFER at approximately 08:30 hours, September 13, 2022. I parked outside the facility in a large parking lot. I entered the facility through an entrance lobby and Ms. Sigler welcomed me to the facility. I asked to meet with Mr. Jon Nordling, identified as the client contact. Ms. Sigler stated that Mr. Nordling was no longer employed by ALTORFER and summoned Mr. Glass, hired as Mr. Nordling's replacement. Shortly thereafter, Mr. Glass joined us in the entry lobby. I briefly stated the nature of my visit and Ms. Sigler and Mr. Glass took me to a nearby conference room that was used throughout this inspection.

After exchanging pleasantries and business cards (Attachment 1), I started my entrance briefing. I presented my EPA credentials to Ms. Sigler and Mr. Glass. I next presented Ms. Sigler and Mr. Glass a copy of RCRA section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented them a copy of Title 18 U.S. Code, Sections 1001 and 1002. They were made aware of their confidentiality rights and were informed that a Confidentiality Notice would be provided at the end of the inspection to make or not to make any claims. Ms. Sigler acted as the official ALTORFER representative throughout this inspection.

The inspection consisted of an entry briefing, 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. Sigler provided a site map/diagram of the facility (Attachment 2). This attachment was annotated by Mr. Glass to document the location of each photo taken during the visual inspection of the facility.

Document photocopies and 24 photographs were collected as inspection documentation (Attachments 1-15). The locations for each photo are documented on Attachment 2. 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 Ms. Sigler and Mr. Glass. I provided Ms. Sigler a *Confidentiality Notice*, which she signed, indicating no confidentiality claims were made by the facility (see Attachment 3). I provided Ms. Sigler a *Receipt of Documents and Samples* which she signed acknowledging receipt (Attachments 4). I provided Ms. Sigler a *Notice of Preliminary Findings* which she signed acknowledging receipt (Attachment 5).

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)

Notice of Preliminary Findings (EPA Handout)

Instructions for Responding to a Notice of Preliminary Findings (NOPF) (Reverse of NOPF)

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)
Emergency Response Program (EPA Handout)
Managing Your Hazardous Waste: A Guide for Small Business (EPA Handout)

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

ALTORFER sells and services fork lifts and services scissor lifts in four buildings occupying approximately 40,000 square feet under roof. The facility began operating in a light-industrial area of Davenport in 1957. ALTORFER employs approximately 25 personnel working from 07:30-16:30, Monday-Friday. The North American Industry Classification System (NAICS) code for this facility is 81131 – Commercial and Industrial Machinery and Equipment (Except Automotive and Electronic) Repair and Maintenance.

4.2 RCRA Status

The facility Hazardous Waste Site Info Verification Report for Inspector (Attachment 6) identifies the facility as a non-generator of HW. However, I determined that ALTORFER routinely generates waste parts washer solvent generated from two parts washers and historically generated HW paint waste from in-house repair projects. Therefore, I revised Attachment 6 to indicate that ALTORFER is a very small quantity generator (VSQG) of HW. Mr. Glass stated that ALTORFER has converted approximately 20% of fluorescent lighting fixtures to light emitting diode (LED) as fluorescent lighting fixtures fail. Mr. Glass stated that fluorescent lighting fixtures are still used in throughout the facility and spent fluorescent lamps are managed as universal waste (UW). Mr. Glass added that ALTORFER generates used oil, used oil filters, used oil absorbents, and waste anti-freeze during routine preventive maintenance activities. Therefore, I inspected ALTORFER as a VSQG of HW, a small quantity handler of universal waste (SQHUW), and a generator of used oil.

4.3 Facility Waste Streams and Management

Ms. Sigler stated that ALTORFER receives HW management support from Safety-Kleen Systems, Inc., 3035 W. 73rd Street, Davenport, Iowa (Safety-Kleen), (EPA ID# IAD098027592). A waste material profile sheet prepared by Safety-Kleen is attached (Attachment 7). The profile identifies waste streams picked up and transported off-site by Safety Kleen as “oil, petroleum; rags, towels, wipes, polypropylene, and PPE” and does not characterize part washer solvent. Safety-Kleen has historically picked up and manifested HW off-site, routinely services two parts washers, and picks up and transports used oil and waste anti-freeze. Additionally, Safety-Kleen picks up UW-Lamps for recycling. Lead-acid batteries are exchanged on a core-exchange basis with Iowa Battery Company, Inc. (Iowa Battery), 4016 State Street, Bettendorf, Iowa.

The following waste streams are managed by ALTORFER:

General Trash: Ms. Sigler stated that ALTORFER generates approximately one four cubic-yard bin of general trash weekly. The general trash consists of waste office paper, lunch wastes, and miscellaneous cardboard and packing materials. Ms. Sigler 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 by Millenium Waste, Inc. (Millenium), 13606 Knoxville Road, Milan, Illinois, and is transported off-site to the Scott Area Landfill, 11555 110th Avenue, Davenport, Iowa, for sanitary landfill disposal.

Waste Cardboard: Ms. Sigler stated that ALTORFER generates approximately four cubic yards of waste cardboard weekly. The waste cardboard has been determined to be non-RCRA hazardous, by virtue of product and process knowledge. The waste cardboard is picked up and transported off-site by Millenium for recycling.

Scrap Metal: Mr. Glass stated that ALTORFER has generated approximately 58,980 pounds of scrap metal thus far during the 2022 calendar year. The scrap metal consists of old scrapped/junked fork lifts, replaced fork lift parts, and equipment. The scrap metal has been determined to be non-RCRA hazardous, by virtue of product and process knowledge. The scrap metal is picked up and transported off-site four or five times a year by CIMCO Recycling Milan, Inc. (CIMCO), 1709 1st Avenue, Milan, Illinois, for recycling.

Waste Parts Washer Solvent: Mr. Glass stated that ALTORFER uses two 30-gallon parts washers for equipment maintenance activities, generating approximately 30 gallons of waste parts washer solvent every 12 weeks. According to Mr. Glass, the parts washer contains Safety-Kleen Premium Solvent described in Attachment 8. According to Mr. Glass, the solvent has been determined to be non-RCRA hazardous, by virtue of product and process knowledge. The parts washer is routinely serviced by Safety-Kleen.

Waste Aerosol Cans: Mr. Glass stated that ALTORFER generates approximately 10 RCRA-empty waste aerosol cans weekly. The waste aerosol cans include glass cleaner and similar cleaning products, brake cleaner, carburetor cleaner, penetrating oil, and spray paint. Mr. Glass stated that the empty waste aerosol cans are collected in the scrap metal bin for recycling. He stated that the waste aerosol cans have been determined to be empty and non-RCRA hazardous by virtue of product and process knowledge. He added that any aerosol cans that are not empty are transported to the Scott Area Landfill where they are managed as D001 characteristic HW. I provided compliance assistance regarding management of waste aerosol cans that could potentially be hazardous waste as UW during my exit briefing.

Used Oil: Mr. Glass stated that ALTORFER generates approximately 500 gallons of used oil every six months from preventive maintenance activities. The used oil is collected in basins and poured into an approximate 500-gallon aboveground storage tank (AST) located outside the facility. The used oil is pumped out of the AST and transported off-site by Safety-Kleen for recycling.

Used Oil Filters: Mr. Glass stated that ALTORFER generates approximately two 55-gallon containers of used oil filters annually. The used oil filters are crushed on site and are managed as

used oil. The used oil filters are picked up and transported off-site by Safety-Kleen for recycling. A copy of the most recent documentation regarding used oil filters is attached (Attachment 9).

Used Oil Absorbent (Absorbents): Mr. Glass stated that ALTORFER generates between two to four 55-gallon containers of used oil absorbents annually. The containers of used oil absorbents are managed as used oil and are picked up and transported off-site by Safety-Kleen for recycling. A copy of the most recent documentation regarding used oil absorbents is attached (Attachment 10).

Waste Anti-Freeze: Mr. Glass stated that ALTORFER generates approximately one 220-gallon tote of waste anti-freeze annually. The waste anti-freeze is picked up and transported off-site by Safety-Kleen.

Cloth Shop Rags: Mr. Glass stated that ALTORFER generates between 50-75 soiled cloth shop rags weekly. The cloth shop rags are used to clean and detail machinery and to clean parts. Commercial products are used on the cloth shop rags to clean machinery and parts, e.g., multipurpose cleaner, brake cleaner, and carburetor cleaner. The soiled shop rags are picked up and transported off-site by CINTAS Uniform Services (CINTAS), 3020 W. 76th Street, Davenport, Iowa, for laundering. I provided compliance assistance describing the solvent-contaminated wipes rule during my exit briefing.

Spent Fluorescent Lamps: Mr. Glass stated that ALTORFER generates approximately two cardboard containers containing approximately 50 spent fluorescent lamps annually. The spent fluorescent lamps are managed as UW and are picked up and transported off-site by Safety-Kleen for recycling. Mr. Glass added that ALTORFER is replacing fluorescent lighting fixtures with LED fixtures as fluorescent fixtures fail. Approximately 20% of existing fixtures have been converted from fluorescent to LED lighting as of this inspection. I provided compliance assistance describing fluorescent lamp management best practices during my exit briefing.

Lead-Acid Batteries: Mr. Glass stated that ALTORFER generates a tub of various batteries every six months that are managed as UW and recycled with Iowa Battery Company, Inc., 4016 State Street, Bettendorf, Iowa. A copy of the most recent transaction is attached (Attachment 11). I provided compliance assistance describing lead-acid battery management best practices during my exit briefing.

Process Wastewater: Mr. Glass stated that ALTORFER generates an undetermined amount of process wastewater in the facility's wash bay. The process wastewater is generated from the washing of forklift and scissor lift equipment. The debris that is washed from the forklift and scissor lift equipment consists of dirt, sand, dust, and grime. According to Mr. Glass, the process wastewater has been determined to be non-RCRA hazardous by virtue of product and process knowledge. The process wastewater is collected in a floor drain located in the floor of the wash bay. A sump is located beneath the floor drain and collects dirt, sand, and debris prior to releasing the process wastewater through the sanitary sewer system to the Davenport Waste Water Treatment facility, 2606 S. Concord Street, Davenport, Iowa.

Process Wastewater Sludge: Mr. Glass explained that the non-RCRA hazardous process

wastewater sludge is vacuumed from the sump described above annually by Safety-Kleen. A receipt for the most recent sump service is attached (Attachment 12).

Episodic HW Generation: Ms. Sigler explained that ALTOFER generated approximately 200 pounds of HW from a bus repair project undertaken during the 2020 calendar year. She stated that a former ALTOFER employee repaired a bus that had been damaged in a collision within the ALTOFER facility. This event generated two HW profiles: UN1760, Waste Corrosive Liquids (Sodium Silicate), managed as D002 characteristic HW, and UN 1263, Waste Paint, managed as D001, D005, D006, D007, D008, D035, D039, and D040 characteristic and F003 and F005 listed HW. The profiled HW was picked up and manifested off-site by Safety-Kleen, documented by the two uniform hazardous waste manifests (UHWM) attached (Attachments 13 and 14). Ms. Sigler and Mr. Glass stated that this was an episodic event and ALTOFER does not routinely perform collision repairs nor use body repair products and/or paint during normal operations.

4.4 Visual Inspection of Facility Waste Stream Management

I conducted a visual inspection of the facility with Ms. Sigler and Mr. Glass. The visual inspection 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 15.

I observed a scrap metal bin located on the floor of the maintenance shop shown in Photo 1, Attachment 15. Mr. Glass stated that contents of the bin would be transferred to a larger scrap metal bin located outside the facility.

I observed two cardboard containers located on the maintenance shop floor that were used to collect waste cardboard for recycling (Photo 2, Attachment 15).

I observed a YELLOW metal step canister used to collect soiled cloth shop rags used in the detail area (Photos 3 and 4, Attachment 15). The YELLOW metal step canister was less than one-eighth full of soiled cloth shop rags. The soiled cloth shop rags were used with a commercial multi-purpose cleaning product "Tuff Stuff" pictured in Photo 5, Attachment 15. I asked Mr. Glass if ALTOFER had conducted a HW determination on the soiled cloth shop rags used with the commercial multi-purpose cleaning product, to which he responded negatively. I observed another commercial brake and parts cleaner product that was used with cloth shop rags pictured in Photo 6, Attachment 15. I asked Mr. Glass if ALTOFER had conducted a HW determination on the soiled cloth shop rags used with the commercial brake and parts cleaner product, to which he responded negatively. I observed a RED metal step canister that was used to contain soiled cloth shop rags in another area of the maintenance shop. The RED metal step canister was less than one-eighth full of soiled cloth shop rags (Photos 7 and 8, Attachment 15). I observed another commercial carburetor/parts cleaner that was used with the cloth shop rags, pictured in Photo 9, Attachment 15). I asked Mr. Glass if the carburetor/parts cleaner was used with cloth shop rags, to which he replied affirmatively. I asked Mr. Glass if ALTOFER had conducted a HW determination on the soiled cloth shop rags used with the commercial carburetor/parts cleaner product, to which he

responded negatively. I also observed a small YELLOW flammable cabinet filled with a variety of commercial product pictured in Photo 10, Attachment 15. **ALTORFER must conduct a HW determination on the soiled cloth shop rags used with commercial products, e.g., multi-purpose cleaner, brake/parts leaner, and carburetor/parts cleaner in accordance with 40 CFR §262.11 (NOPF No.1 1, Attachment 5).**

I observed one of two approximate 30-gallon parts washers in the maintenance shop (Photo 11, Attachment 15). The label affixed to the lid of the parts washer identified the contents of the washer as Safety-Kleen premium solvent. I did not observe any areas of concern with the parts washers. I observed a 55-gallon container labeled "Used Oil" located inside the maintenance shop (Photo 12, Attachment 15). The container had a pump and hoses affixed to the top and was used to vacuum used oil from catch pans used in the maintenance shop during the performance of maintenance activities. I observed an oil filter crushing unit (Photo 13, Attachment 15). I observed a 55-gallon container labeled with the words "Used Oil" located next to the used oil crushing unit (Photo 14, Attachment 15). The 55-gallon container was less than ½-full of crushed used oil filters (Photo 15, Attachment 15). I observed a labeled, approximate 500-gallon AST that was between ¼ and 1/2 full, according to a gauge, of used oil (Photo 16, Attachment 15). The AST was connected by piping that came from the interior of the maintenance shop, presumably from the used oil crushing area. The AST appeared to be in good condition and was located inside a containment area to prevent spillage of the used oil.

I observed a plastic container of waste anti-freeze located adjacent to the AST containing used oil (Photo 17, Attachment 15). I could not determine how much anti-freeze was contained in the container. I did not observe any issues with the waste anti-freeze container.

I observed the wash bay (Photo 18, Attachment 15) and floor drain (Photo 19, Attachment 15) used to wash vehicles before and after maintenance activities were accomplished in the maintenance shop. I did not observe any issues with the wash bay.

I observed a plastic container approximately one-half full of lead-acid batteries shown in Photo 20, Attachment 15. I did not observe any issues with the lead-acid batteries.

I observed a large scrap metal bin located outside the facility (Photo 21, Attachment 15). I did not observe any issues with the scrap metal.

I observed an open cardboard container containing spent fluorescent lamps located inside the Parts Warehouse (Photos 22, 23, and 24, Attachment 15). The open cardboard container contained approximately 10 spent eight-foot fluorescent lamps and approximately 43 spent four-foot fluorescent lamps. The label affixed to the cardboard container of spent lamps identified the contents as "Universal Waste-Used Bulbs" and was dated "6/5/22" as documented in Photo 24, Attachment 15. **ALTOFER must keep UW-Lamps in a closed container or package in accordance with 40 CFR §273.13(d)(1) (NOPF No. 2, Attachment 5).** I provided UW-fluorescent lamp compliance assistance during my exit briefing.

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

4.5 Documentation

Prior to this CEI, I reviewed two electronic uniform hazardous waste manifests (UHWM) for HW generated by this facility, spanning the period of January 1, 2019, thru May 10, 2022. The two manifests were generated for the episodic event described above, documented by Attachments 13 and 14. I did not observe any issues with the UHWM.

5.0 SUMMARY

I documented the following preliminary findings during this CEI:

NOPF No. 1: 40 CFR §262.11: Conduct a HW Determination on the cloth shop rags contaminated with commercial products, e.g., all-purpose cleaner; brake cleaner; and carburetor cleaner (Attachment 5).

NOPF No. 2: 40 CFR §273.13(d)(1): Failure to keep universal waste lamps in closed containers or packages (Attachment 5).

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)

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BRYANT (Affiliate)
Date: 2022.10.24 11:23:03
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Date: 9/22/2022

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

AMBER WHISNANT

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Date: _____

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

Attachments:

- 1) Business Card (1 page)
- 2) Site Map/Diagram (1 page)
- 3) Confidentiality Notice (1 page)
- 4) Receipt of Document and Samples (1 page)
- 5) Notice of Preliminary Findings (1 page)
- 6) Hazardous Waste Site Info Verification Report for Inspector (1 page)
- 7) Safety-Kleen Waste Material Profile Sheet, Profile No. 40747289, dated May 7, 2021 (3 pages)
- 8) Safety Data Sheet (SDS), Safety-Kleen Premium Solvent (9 pages)
- 9) Safety-Kleen Receipt, Used Oil Filters (1 page)
- 10) UHWM 008153374SKS, dated 4/15/2022, Oily Absorbents (1 page)
- 11) Iowa Battery Co., Inc email, dated July 8, 2022, Battery Recycling (1 page)
- 12) Safety-Kleen Receipt, Oily Liquid (1 page)
- 13) UHWM 007802087SKS, dated 11/3/2020 (3 pages)
- 14) UHWM 007802091SKS, dated 11/3/2020 (4 pages)
- 15) Photo log (2 pages) and Photos (24 pages)