

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

Clarios LLC
2015 Fernwood Ave
Red Oak, IA 51566
(712) 623-6238

EPA ID Number: IAR000502898

On

December 13, 2021

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 Clarios LLC (Clarios) in Red Oak, Iowa on December 13, 2021. 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

Clarios LLC.:

Jason Goltz, Plant Manager
Scott Bruce, Total Productive Maintenance Planner
Beth Beeson, EHS Manager
Bill Wombacher, Quality Engineer
Timothy Kammerer, Process Engineer
Lana McMann, Human Resources

Aaron Sorenson, Engineering Manager
Mark Brown, Area Manager
Melissa Bitter, Corporate EHS Manager

EPA Representative, ERG:
Janosh Wolters, Energy Engineer

3.0 INSPECTION PRECEDURES

Due to the COVID-19 pandemic, I contacted the facility via telephone and spoke with Ms. Beeson on December 6, 2021 at 11:30. We discussed facility specific safety protocols to ensure the safety of all personnel involved during the inspection and I informed her when I would arrive at the facility to perform the inspection. After arriving announced at Clarios at approximately 07:30, I performed a drive-by 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 visitor's log. Ms. Beeson then led me to a conference room to begin the opening conference at approximately 07:35. I initiated the opening conference with Jason Goltz, Scott Bruce, Beth Beeson, Bill Wombacher, Timothy Kammerer, Lana McMann, Aaron Sorenson, Mark Brown, and Melissa Bitter present as the Clarios representatives. I presented them 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. Beeson with a copy of the *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections* and reviewed Clarios' confidentiality rights. I informed Ms. Beeson 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. Beeson 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. Beeson guided me throughout the facility in order to conduct thorough evaluations of the facility's satellite accumulation areas (SAAs) and central accumulation areas (CAAs). At the time of the inspection, the facility was operating 17 SAAs and four CAAs. The facility also handles universal waste in designated areas on site as shown on the facility layout. All universal waste storage areas were visually inspected. Clarios uses three parts washers on site. All parts washer waste is managed as hazardous waste. I conducted an in-depth visual inspection of the SAAs, the CAAs, the universal waste storage areas, 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. Beeson with a *Confidentiality Notice*, and *Receipt for Documents and Samples* which she signed as acknowledgement of receipt (see Attachments 5 and 6 respectively). No confidentiality claims were made by Clarios.

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

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)

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

Clarios began operating in 2003 and currently employs approximately 80 people. The facility operates on a 24/7 schedule with four rotating shift teams. The facility has a footprint of approximately 90,000 square feet. Clarios' operations consist of the manufacturing lead-acid batteries. The major raw material used is lead. The major manufacturing or processing operation that generates waste streams include manufacturing lead-acid batteries. The following waste streams are produced: lead contaminated debris, mill sludge, parts washer solvent, ultrasonic cleaner, scrap metal, process wastewater, universal wastes, used oil, used oil filters, and general trash.

4.2 RCRA Status

According to the *Hazardous Waste Site Info Verification Report for Inspector* (see Attachment 7), Clarios notified as a federal large quantity generator (LQG) of D001, D008, D035, D039, D040, U002, U031, U057, U080, U112, U154, U159, U161, U210, U220, U228, U239, and

U239 hazardous wastes. I asked Ms. Beeson 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. Beeson stated all U listed waste codes should not apply and that this was most likely added as a mistake. In addition, Ms. Beeson stated D035 and D040 should be removed. After reviewing the records and walking through the facility, I determined that the facility is operating as a LQG of D002, D008, and D039 hazardous wastes, a generator of used oil, and a small quantity handler (SQH) of universal waste. Clarios 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.

I was unable to obtain a copy previous inspection report prior to this inspection. During the inspection, I asked Ms. Beeson if the facility's name changed. Ms. Beeson stated the facility's name changed due to an acquisition that took place on October 19, 2020. The facility was previously called Johnson Controls Battery Group, LLC. Ms. Beeson stated she believed the previous EPA RCRA inspection took place during 2018. I asked if the facility received a notice of preliminary findings (NOPF) as a result of the inspection. Ms. Beeson stated findings were found in regard to the facility's failure to label universal waste and SAA containers properly. Ms. Beeson stated Clarios responded by correcting issues that led to the findings as shown through documentation provided by the facility, and no enforcement actions were taken. Ms. Beeson provided the response from an EPA compliance officer stating no further action was needed from Clarios.

4.3 Facility Waste Streams and Management

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

The rest of this page left blank intentionally.

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
1	Lead Dross By-Product (Bill of Lading (BOL) included in Attachment 8)	Lead by-product from filtering process in pollution control system	Excluded per 40 CFR 261.2(c)(3) (based on process knowledge and knowledge of the product)	150,000 pounds per month	Supersacks	Shipped to Gopher Resource in Eagan, MN for reclamation
2	Lead Contaminated Debris (Waste Profile included in Attachment 9)	Contaminated PPE, rags, and floor sweepings	D008 (based on process knowledge, knowledge of the product, and analytical testing) (Analytical testing included in Attachment 10)	3,000 pounds per month	Gaylord boxes in CAAs and 55-gallon containers in SAAs	Buchheit Trucking in Scott City, MO (MOR000000976) to Buick Resource Recycling Facility LLC in Boss, MO (MOD059200089) for treatment
3	Mill Sludge (Waste Profile included in Attachment 11)	Rolling mill maintenance	D008 (based on process knowledge and knowledge of the product)	150 gallons per year	30-gallon containers in SAAs	Buchheit Trucking in Scott City, MO (MOR000000976) to Buick Resource Recycling Facility LLC in Boss, MO (MOD059200089) for treatment
4	Parts Washer Solvent (Waste Profile included in Attachment 12)	Cleaning small parts and tools	D008, D039 (based on process knowledge and knowledge of the product)	60 gallons serviced each month	In parts washers (Two parts washers on-site)	Safety Kleen in Denton TX (TXR000081205) to Safety Kleen Systems, Inc. in Omaha, NE (NED981495724) for reclamation
5	Ultrasonic Cleaner (Waste Profile included in Attachment 13)	Cleaning small manufacturing parts	D002, D008 (based on process knowledge and knowledge of the product)	30-gallon container serviced every two months	In parts washer (One parts washer on-site)	Safety Kleen in Denton TX (TXR000081205) to Safety Kleen Systems, Inc. in Omaha, NE (NED981495724) for reclamation

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
7	Baghouse Filters	Maintenance of pollution control system	Excluded per 40 CFR 261.2(c)(3) (based on process knowledge and knowledge of the product)	1,200 pounds per month	Gaylord boxes	Shipped to Gopher Resource (MND006148092) in Eagan, MN for reclamation
8	Scrap Metal	Facility operations	Nonhazardous (based on process knowledge and knowledge of the product)	20-yard container picked up monthly	20-yard container	Travis Iron in Corning, IA for recycling (Invoice included in Attachment 14)
9	Used Oil (Waste Profile included in Attachment 15)	Facility maintenance	Exempted (managed as used oil per 40 CFR 279)	One 275-gallon container per year	275-gallon container	Safety Kleen in Denton TX (TXR000081205) to Safety Kleen Systems, Inc. in Omaha, NE (NED981495724) for recycling
10	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	Safety Kleen in Denton TX (TXR000081205) to Safety Kleen Systems, Inc. in Omaha, NE (NED981495724) for recycling

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
11	Process Wastewater/Oily water (Waste Characterization included in attachment 16)	Cooling water/coolants	Nonhazardous (based on process knowledge and knowledge of the product)	Two 6,500-gallon tanks are serviced twice per month	6,500-gallon tanks	Safety Kleen in Denton TX (TXR000081205) to Safety Kleen Systems, Inc. in Omaha, NE (NED981495724) for treatment
12	Universal Waste Lamps	Facility maintenance	Exempted (managed as universal waste per 40 CFR 273)	One 4-foot container and one 8-foot container	4-foot container, 8-foot container	Safety Kleen Systems Inc. in Denton TX (TXR000081205) to Safety Kleen Systems, Inc. in Omaha, NE (NED981495724) to Safety Kleen Systems Inc. in Fort Worth, TX (TXD981053416) for recycling
13	Universal Waste Batteries	Facility maintenance	Exempted (managed as universal waste per 40 CFR 273)	Two 1.5-gallon container and one 3.5-gallon containers every year	1.5-gallon containers and 3.5-gallon containers	Safety Kleen Systems Inc. in Denton TX (TXR000081205) to Safety Kleen Systems, Inc. in Omaha, NE (NED981495724) to Safety Kleen Systems Inc. in Fort Worth, TX (TXD981053416) for recycling

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
14	Universal Waste Aerosol Cans	Used aerosol cans	Exempted (managed as universal waste per 40 CFR 273)	Two 55-gallon containers per year	55-gallon containers	Safety Kleen in Denton TX (TXR000081205) to Safety Kleen Systems, Inc. in Omaha, NE (NED981495724) or Clean Harbors Aragonite LLC in Aragonite, UT (UTD981552177) for recycling
15	General Trash	Facility operations	Nonhazardous (based on process knowledge and knowledge of the product)	One 40-yard container and one 20-yard container picked up once per month	One 40-yard container and one 20-yard container	Batten Sanitation in Red Oak, IA to Montgomery County Landfill for landfill

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

Clarios has four Less-Than-90-Day CAAs on site as labeled on the facility layout (see Attachment 1). I visually inspected all CAAs during the visual inspection. CAA #1 is the facility's main CAA (see Attachment 3, Photo 4). I observed five gaylord boxes with the approximate dimensions of 48 inches by 40 inches by 36 inches. All gaylord boxes on site were the same size. The gaylord boxes were filled and held lead contaminated debris. CAA #2, #3, and #4 were placed in between manufacturing lines and operators emptied the various SAA containers staged throughout the manufacturing lines into their respective CAA container (see Attachment 3, Photo 6). During records review, I ensured all employees performing hazardous waste operations are included in annual refresher RCRA training and that Clarios defined all job descriptions accurately. See section 4.10 of this report for more information. CAA containers are then consolidated in CAA #1 prior to shipment off-site. The earliest accumulation date on a container in a CAA was November 11, 2021. This container was located in CAA #1. November 11, 2021 is within 90 days from the time of the inspection.

The Less-Than-90-Day CAA containers observed in CAA #1, CAA #2, CAA #3, and CAA #4 were 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". All accumulation start dates were within 90 days from the time of the inspection.

In regard to all CAAs, I observed adequate aisle space to allow for container inspections and access in the event of a spill. At the time of the inspection, lead contaminated debris was the only hazardous waste I observed stored in facility CAAs #1 - #4. I observed a fire extinguisher, spill control equipment, and related safety equipment near each CAA. Operators handling hazardous, emptying SAA containers into CAAs, or manage hazardous waste at Clarios, are trained to use their two-way radio system in case of emergencies. I asked Ms. Beeson if the facility inspected the CAAs. Ms. Beeson stated the facility inspected the CAAs at least weekly and had weekly inspection logs. During records review, Ms. Beeson provided inspection logs for the CAAs. Ms. Beeson stated this one log covers all four CAAs on-site and during each CAA inspection, all four CAAs are inspected. I reviewed the logs and determined the facility was adequately performing weekly inspections of the CAAs. An example of a CAA log is provided in Attachment 17. I did not note any issues or findings at the CAAs during the inspection.

4.5 Satellite Accumulation Areas

I observed 17 SAAs 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	Outside Office Area 1	Lead Contaminated Debris	10 gallons	55-gallon drum
2	Loading Dock Area	Lead Contaminated Debris	15 gallons	55-gallon drum

3	Western Corner Loading Dock	Lead Contaminated Debris	10 gallons	55-gallon drum
4	Southern Portion Line 5	Lead Contaminated Debris	5 gallons	55-gallon drum
5	Mill Sludge Line 5	Lead Mill Sludge	15 gallons	25-gallon drum
6	Southern Portion Line 4	Lead Contaminated Debris	15 gallons	55-gallon drum
7	Mill Sludge Line 4	Lead Mill Sludge	10 gallons	25-gallon drum
8	Southern Portion Line 2 & 3	Lead Contaminated Debris	25 gallons	55-gallon drum
9	Mill Sludge Line 3	Lead Mill Sludge	10 gallons	25-gallon drum
10	Southern Portion Line 1 & 2	Lead Contaminated Debris	15 gallons	55-gallon drum
11	Mill Sludge Line 2	Lead Mill Sludge	10 gallons	25-gallon drum
12	Mill Sludge Line 1	Lead Mill Sludge	10 gallons	25-gallon drum
13	Middle Portion of Line 1 & 2	Lead Contaminated Debris	15 gallons	55-gallon drum
14	Northern Portion Line 1	Lead Contaminated Debris	25 gallons	55-gallon drum
15	Spill Containment Area	Lead Contaminated Debris	10 gallons	55-gallon drum
16	Outside Office Area 2	Lead Contaminated Debris	10 gallons	55-gallon drum
17	Employee Entrance Area	Lead Contaminated Debris	5 gallons	55-gallon drum

During the visual inspection, I observed two different types of SAA containers. The majority of the SAA containers were 55-gallon containers accumulating lead contaminated debris which included, PPE, rags, and floor sweepings (see Attachment 3, Photos 8 and 9). These SAA containers had an attached swivel lid to the top of the container. EPA guidance released on December 3, 2009, stating “For solid and semi- solid hazardous wastes, EPA considers the container "closed" as long as there is complete contact between the lid and the rim all around the top of the container”. In addition, the SAA containers shown in Photos 8 and 9 were in a low traffic locations and wedged securely against the wall to prevent being tipped over. Ms. Beeson stated all 55-gallon containers are lined with plastic bags and once the containers accumulate waste up until the point where the swivel lid cannot operate (approximately 50 gallons), the plastic bag is removed and placed into a CAA container. Due to the waste being a solid waste,

the facility's management practice, all swivel heads operating properly, I determined the lid to be closed per EPA guidance. Upon further review, EPA may determine this lid is not sufficient for complete closure and a finding for failing to keep containers in SAA #1-4, 6, 8, 10, and 13-17 closed. The waste profile and analytical report for this waste stream is provided in Attachment 9 and 10, respectively. The facility also managed 30-gallon containers accumulating lead mill sludge in SAAs #5, 7, 9, 11, and 12 (see Attachment 3, Photo 5). The waste profile for the mill sludge is provided in Attachment 11.

All SAA containers were in good condition, closed, labeled with the indication of the nature of the hazard, and labeled with the words "Hazardous Waste".

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

4.6 Lead Dross By-Product

During the visual inspection, I observed the manufacturing process. Clarios only creates one product, the lead component of lead-acid batteries. This product is shipped to other Clarios sites for final assembly. The only manufacturing processes on site that generate a hazardous waste are the five-roller mill and smelter lines. The smelter process generates a lead dross due to the facility's filtering process. The dross is a dust like material that is collected in supersacks. The dust material is managed as a by-product per 40 CFR 261.2(c)(3) for reclamation. Ms. Beeson explained the dust has financial value to the facility and is shipped on a BOL to Gopher Resource in Eagan, MN. Gopher recovers the lead for resale. An example of a BOL is provided in Attachment 8. The reclaimed material would be considered a hazardous waste only for its D008 characteristic.

During records review, Ms. Beeson also provided a nonhazardous material verification form for the dross/dust material. This form is provided in Attachment 18. I observed seven super sacks of this material in CAA #1. The containers are not labeled in the CAA but are placed under signs that are labeled "Dross Storage" (see Attachment 3, Photo 4). In addition, each line collected this material in super sacks before being moved to CAA #1 for shipment off site (see Attachment 3, Photo 7). Baghouse filters that are used to filter this waste are also sent to Gopher Resource and are managed under this exclusion. During maintenance operations, baghouse filters are accumulated in gaylord boxes. Ms. Beeson stated all baghouse filters are sent off-site for reclamation. In addition, Ms. Beeson stated gaylord boxes are shipped off at least monthly. Therefore, I determined the facility was in compliance with the exclusion stated in 40 CFR 261.2(c)(3) and this material would not be considered a solid waste.

I reviewed the management of this material from the manufacturing process and no issues or findings were noted.

4.7 Parts Washers

During the visual inspection, I observed three 30-gallon parts washers. Ms. Beeson explained two parts washers are used to clean small parts and tools from maintenance. I asked Ms. Beeson

what type of parts washer solution is used. Ms. Beeson stated a nonhazardous solvent solution is used. The SDS for this parts washer solution is provided in Attachment 19. Ms. Beeson stated the maintenance team uses spray brake cleaner in aerosol cans. During the visual inspection, I observed break cleaner that contained tetrachlorethylene. Ms. Beeson stated it would be extremely rare and near impossible for break cleaner to be added into the parts washer, but the facility manages these parts washers waste to include the D039 characteristic. Due to the amount of lead on parts and tools, the parts washers waste solvent includes the D008 characteristic. Therefore, the facility manages these parts washers waste as a D008 and D039 hazardous waste. The waste profile for the parts washer's waste solvent is provided in Attachment 12.

I asked Ms. Beeson if rags are used during this operation. Ms. Beeson stated rags are not generally used in this process. I asked Ms. Beeson if break cleaner was sprayed onto parts before being added to the parts washers for cleaning. Ms. Beeson stated this would be unlikely and not a usual management practice. Ms. Beeson stated if a rag would be used to wipe off excess parts washer solution that was contaminated with break cleaner, this rag would be managed as a hazardous waste. I did not observe any solvent contaminated rags during the visual inspection. I explained to Ms. Beeson based on the management practice of the parts washers and how maintenance teams use the parts washer, the D039 waste code did not appear to apply. Ms. Beeson stated the facility managed it as a D039 out of an abundance of caution.

In addition, the facility manages one 30-gallon parts washer that uses an ultrasonic cleaner. Ms. Beeson stated this parts washer is used to clean various smaller manufacturing parts. Ms. Beeson stated the maintenance team does not clean parts in the ultrasonic cleaner that have had the break cleaner sprayed onto them. Based on the parts cleaned in the parts washer, the waste is managed as a D002 and D008 waste. The waste profile is provided in Attachment 13.

I reviewed the management and documentation regarding the parts washers and no issues or findings were noted.

4.8 Universal Waste Accumulation Area

Clarios manages universal waste in designated areas throughout the facility. Universal waste lamps and batteries are managed outside the facility's office area. I observed one 3.5-gallon container and two 1.5-gallon containers of universal waste batteries. All three containers were closed, in good condition, and labeled as "Universal Waste Used Batteries". The earliest accumulation start date observed on a universal waste battery container was "8/9/21" (see Attachment 3, Photo 2). Directly next to the universal waste batteries, I observed one four-foot-tall container and one eight-foot-tall container of universal waste lamps. Both universal waste lamps were closed, in good condition, and labeled as "Universal Waste Used Bulbs." The earliest accumulation start date observed on a universal waste lamps container was "1/25/21". Lastly, I observed one 55-gallon container of universal waste aerosol cans located in the northern corner of the facility. The container was closed, in good condition, and labeled "Universal Waste Aerosol Cans". The accumulation start date on the container was "10/15/21". Ms. Beeson

explained the primary aerosol can used on site is break cleaner. Ms. Beeson stated the maintenance team may use other lubricants during maintenance operations. At the time of the inspection, the only aerosol can I observed during the visual inspection was break cleaner. The manifest and certificates of recycling for universal wastes are provided in Attachment 20.

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

4.9 Used Oil

I visually observed the facility's used oil storage area located in the northern portion of the facility as labeled on the facility layout (see Attachment 1). There was one 275-gallon container in this area holding approximately 20 gallons of used oil. The waste profile used to ship used oil off site is provided in Attachment 15. The containers were closed, labeled "Used Oil", and in good condition. I also observed the facility's two 6,500-gallon process wastewater/oily water tanks in this area. Clarios generates wastewater during manufacturing of lead-acid batteries. Water is mixed with coolants in order to cool materials throughout the manufacturing process. This results in large amounts of wastewater/oily water which is then stored in the two 6,500-gallon tanks. During records review, Ms. Beeson provided the documentation showing how the facility determined their process wastewater was nonhazardous. The documents included SDS for coolant mixtures used in the process water. These documents are provided in Attachment 16. I did not note any issues or findings at the used oil storage area.

4.10 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 containers in CAAs (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 21) was on file electronically and in a binder and was reviewed while on site. The contingency plan had been revised on June 9, 2021, and included emergency evacuation routes, emergency response procedures, emergency coordinators and contact information, and a list of emergency response equipment.

The quick reference guide was included within the contingency plan. The facility had submitted the guide and contingency plan to local emergency response agencies including the local police department, fire department, and hospital. Upon review of the guide, I observed a list and description of hazardous waste with estimated maximum amounts of each waste on site at one time. The guide summarized evacuation and emergency response procedures as well. The guide included a map showing where hazardous waste is generated and accumulated on site, and

another map showing the facility in relation to surrounding businesses, schools, and residential areas. Lastly, the guide included references to water supply and fire response equipment locations, identification of on-site notification systems or alarms, and the name and telephone number for the emergency contact for the area. I reviewed the entire RCRA contingency plan, and no 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 Clarios 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 Clarios receive, I determined the training to be sufficient. During records review, Ms. Beeson provided yearly records of completed trainings for all employees handling hazardous waste on-site and emergency coordinators listed in the contingency plan. The facility uses a tracking system in excel and this large spreadsheet is divided into individual facility teams. An example of this spreadsheet showing training records is included in Attachment 22. The example provided does not include certain emergency coordinators, but I reviewed the entire spreadsheet and ensured all emergency coordinators attended hazardous annual refresher training.

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

Manifest and Land Disposal Restriction (LDR) Requirements – Clarios maintained records of manifests on site at the time of inspection dating back three years. Clarios generated approximately 66 manifests over the last three years. I reviewed the 66 manifests from the last three years. Manifests for both types of hazardous waste observed on site and corresponding LDR are provided in Attachment 23 as an example.

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

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

Janosh
Wolters

Digitally signed by
Janosh Wolters
Date: 2022.02.02
00:02:03 -05'00'

Janosh Wolters
Energy Engineer
Date: February 2, 2022

AMBER
WHISNANT

Digitally signed by
AMBER WHISNANT
Date: 2022.02.07 22:06:46
-06'00'

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

Attachments:

1. Facility Layout (1 page)
2. Clarios LLC Photolog (1 page)
3. Clarios LLC Photos (9 photos/10 pages)
4. EPA Inspection Checklist (35 pages)
5. Confidentiality Notice (1 page)
6. Receipt for Documents and Samples (1 page)
7. Hazardous Waste Site Info Verification Report for Inspector (1 page)
8. Dross BOL (1 page)
9. Lead Contaminated Debris Waste Profile (5 pages)
10. Lead Contaminated Debris Analytical (12 pages)
11. Mill Sludge Waste Profile (3 pages)
12. Parts Washer Waste Profile (3 pages)
13. Ultrasonic Solution Waste Profile (4 pages)
14. Scrap Metal Invoice (1 page)
15. Used Oil Waste Profile (4 pages)
16. Used Oily Water Waste Characterization (74 pages)
17. CAA Inspection Log (1 page)
18. Dross Nonhazardous Material Verification (1 page)
19. Safety Kleen Parts Washer SDS (9 pages)
20. Universal Waste Manifest & Recycling Certificates (6 pages)
21. Contingency Plan (28 pages)
22. Training Records (1 page)
23. Manifests & LDR Forms (4 pages)