REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At
Des Moines Register
7400 DMR Drive
Des Moines, Iowa 50321
(515) 471-3532

EPA ID Number: IAR000500298

On

April 12, 2022, 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 Des Moines Register (DMR) located in Des Moines, Iowa, on April 12, 2022. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. The facility was most recently inspected for RCRA compliance on May 3, 2006. Findings documented during that inspection are listed in Section 5, Summary, of this report. During this inspection, 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

DMR:
Beth Ptak, Production Director, approximately 22 years with the company and approximately four years in current position.
David Baum, Packaging Manager, approximately 34 years with the company.
Phuc Huyn, Press Room Manager, approximately 22 years with the company.

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

3.0 INSPECTION PROCEDURES

Prior to beginning the inspection, I conducted a visual reconnaissance of DMR on April 12, 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 DMR at approximately 0840 hours, April 12, 2022. I parked outside the production facility in a posted visitor parking space. I approached the main facility entrance that was posted with signage stating that the facility was not open to the public, with additional instructions to call numbers for circulation, delivery, etc. After several unsuccessful attempts to reach someone working inside the facility, I observed an employee approaching the entrance walking from the parking lot. As the employee approached me standing outside the entry door, I asked the employee if he worked for the DMR and determined that the employee was an information technology (IT) specialist dispatched from the DMR's downtown Des Moines office to work on computer equipment located inside the production facility. I identified myself and the employee let me into the facility and summoned Mr. Baum to meet me in the entrance lobby.
Mr. Baum arrived in the entrance lobby shortly thereafter. I asked to meet with Mr. Johnson, identified as the client contact. Mr. Baum stated that Mr. Johnson was no longer working at this facility. I presented my EPA Credentials and explained the purpose of my visit. Mr. Baum stated that he was familiar with facility operations and would "do his best" to answer my questions regarding hazardous waste (HW) management. We took seats in the entrance lobby, and I began to explain CEI details when Ms. Ptak arrived, entered the lobby, and joined us seated in the entrance lobby. After a brief interchange, Ms. Ptak suggested that we move out of the entrance lobby to a conference room that was used throughout the remainder of this CEI.

I started my entrance briefing after we moved to the conference room. I presented my EPA credentials to Ms. Ptak and Mr. Baum. Ms. Ptak and I exchanged business cards (Attachment 1). I next presented Ms. Ptak and Mr. Baum 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. Ptak acted as the official facility 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. Ptak provided a site map/diagram of the facility (Attachment 2).

Document photocopies and nine photographs were collected as inspection documentation (Attachments 1-12). 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. Ptak. I provided Ms. Ptak a *Confidentiality Notice,* which she signed, indicating no confidentiality claims were made by the facility (see Attachment 3). I provided Ms. Ptak a *Receipt of Documents and Samples* which she signed acknowledging receipt (Attachments 4). I provided Ms. Ptak 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)
RCRA Online A Quick Reference Guide (EPA Handout)
Emergency Response Program (EPA Handout)
Security Awareness (EPA Handout)
Managing Your Hazardous Waste: A Guide for Small Business (EPA Handout)

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

This facility is located in a mixed industrial area located south of the Des Moines airport, generally south of the Des Moines metropolitan area. The facility began operations in 1999 and sits on approximately 14 acres, featuring one large building that occupies approximately 120,000 square feet under roof. DMR has approximately 60 employees working 24 hours a day, seven days a week. The facility prints newspapers and newspaper advertising inserts using a lithographic printing process. Major raw materials used by the facility include paper, soy-based printing ink, aluminum sheeting (used for printing plates), and a printing blanket wash solvent. The North American Industry Classification System (NAICS) codes for this facility are 5111 – Newspaper Publishers and 32311 – Printing.

DMR is owned by Gannett Publishing Services, LLC and prints newspapers and newspaper

inserts for a number of widely known publications, to include the Wall Street Journal and USA Today. The production building has an area designated for stamping aluminum plates; maintenance areas; material and product storage areas; and office space. A less-than-180-day HW central accumulation area (HWCAA) is located in the maintenance area on the main floor (Level 2) shown on Attachment 2. Peak printing activities occur Saturday and mid-week evenings when advertising inserts are printed and inserted into newspapers.

4.2 RCRA Status

The facility Notification Acknowledgement/Verification Report identifies the facility as a very small quantity generator (VSQG) of D001 and D011 characteristic HW. However, Ms. Ptak stated that DMR changed products used in the printing process "several years ago" and no longer generates D011 characteristic HW. I updated the Notification Acknowledgement/Verification Report (Attachment 6) accordingly. She added that the facility converted all lighting to light emitting diode (LED) fixtures in 2018. I determined that the facility generates less than100 kg of D001 characteristic HW monthly and therefore inspected DMR as a VSQG of HW. DMR also generates used oil during printing machinery preventive maintenance activities.

4.3 Facility Waste Streams and Management

DMR receives HW management support from Barton Solvents, Inc. (Barton), 1970 NE Broadway Avenue, Des Moines, Iowa. HW shipments are picked up and transported off-site by Barton (EPA ID# IAD981719909). Documented HW shipments were transported to WRR Environmental Services Company, Inc. (WRR), 5200 Ryder Road, Eau Claire, Wisconsin (EPA ID# WID990829475) for fuel blending.

Mr. Baum stated that DMR generates less than five gallons of spent blanket/roller wash monthly that is managed as D001 characteristic HW. The blanket/roller wash is generated in the printing press, where the solvent is sprayed automatically onto the printing blankets and rollers. The printing press operators scrape excess spent solvent, mixed with printing residue (a mixture of ink, rubber, aluminum, and paper) into trays attached to the printing machinery. The residue collected in the trays attached to the printing machinery is cleaned out weekly. This residue is collected in five-gallon containers and transported to a 55-gallon drum located inside the HWCAA.

Mr. Baum stated that non-RCRA hazardous waste ink is also generated whenever color changes are made using the printing machinery. Mr. Baum stated that DMR generates three to four 55-gallon drums of waste ink annually. The non-RCRA hazardous waste ink is collected in five-gallon containers located at or near the printing machinery, transported from the printing area, and placed into a 55-gallon drum that is located inside the HWCAA.

DMR generates waste aluminum that is picked up and transported off-site by United Scrap Metal, Inc. (United), 1545 S. Cicero Avenue, Cicero, Illinois, for recycling.

DMR generates waste newsprint that is picked up and transported off-site by ABC Metals and

Recycling (ABC), 829 SE 21st Street, Des Moines, Iowa, for recycling.

DMR uses cloth rags to clean the printing machinery. The cloth rags are contaminated with a mixture of printing ink and blanket/roller wash. The cloth rags are picked up, laundered, and returned to the facility by Aramark Uniform Services (Aramark), 2500 Delaware Avenue, Des Moines, Iowa.

DMR operates fork trucks that are maintained on-site by Associated, 4421 NW Urbandale Avenue, Urbandale, Iowa.

DMR generates used oil during routine maintenance of printing machinery, pumps, and associated equipment. Used oil is collected in a 55-gallon drum located inside the maintenance shop. The used oil is picked up and transported off-site by Barton for recycling.

The following waste streams are managed by DMR:

General Trash: Ms. Ptak stated that DMR generates approximately one 30-cubic yard roll-off container of general trash weekly. The general trash consists of waste office paper, lunch wastes, and miscellaneous cardboard and packing materials. Ms. Ptak stated that the general trash has been determined to be non-RCRA hazardous, by virtue of product and process knowledge. The general trash is picked up weekly by Aspen Waste Systems (Aspen), 1800 E. Euclid Avenue, Des Moines, Iowa, and transported off-site to the Metro Park East Landfill, Mitchellville, Iowa, for sanitary landfill disposal.

Waste Blanket/Roller/Ink Mixture: Ms. Ptak stated that DMR generates approximately 55 gallons of a mixture of waste blanket/roller/ink annually. The waste blanket/roller/ink mixture is managed as D001 characteristic HW and is profiled as UN 1268, Waste Petroleum Distillates. The safety data sheet (SDS) describing the blanket/roller wash solvent is attached (Attachment 7). The waste blanket/roller/ink mixture is collected in a 55-gallon drum located inside the HWCAA that is picked up and transported off-site by Barton for fuel blending at WRR.

Waste Ink: Ms. Ptak stated that DMR generates approximately 110 gallons of waste ink annually. The waste ink is profiled as UN 1210, Printing Ink Related Material. The SDS for the soy-based ink used by DMR are attached: Black (Attachment 8); Red (Attachment 9); Blue (Attachment 10); and Yellow (Attachment 11). Ms. Ptak stated that the waste ink has been determined to be non-RCRA hazardous, by virtue of product and process knowledge. The waste ink is picked up and transported off-site by Barton for fuel blending at WRR.

Soiled Cloth Shop Rags: Mr. Baum stated that DMR generates approximately 50 soiled cloth shop rags weekly. The cloth shop rags are used to clean ink and blanket/roller wash solvent from the printing machinery, work surfaces, and operator hands. The soiled cloth shop rags are collected in five-gallon metal containers located throughout the production area. The soiled cloth shop rags are transferred from the five-gallon metal step canisters to a laundry cart that is wheeled throughout the facility to collect the soiled shop rags. The laundry cart of soiled cloth shop rags is

then wheeled to an area where the soiled cloth shop rags are placed into 55-gallon plastic containers. The 55-gallon plastic containers of soiled cloth shop rags are picked up and transported off-site, laundered, and returned by Aramark.

Waste Aerosol Cans: Ms. Ptak stated that DMR generates approximately one RCRA-empty waste aerosol can every three to six months. The waste aerosol cans include glass cleaner and similar cleaning products. The empty waste aerosol cans are currently disposed in the general trash. Ms. Ptak expressed interest in learning more about managing waste aerosol cans as universal waste (UW), which was addressed as compliance assistance during our exit briefing.

Aluminum Scrap Metal: Mr. Baum explained that DMR uses a chemical-free process to imprint aluminum plates used in the printing presses. He stated that the aluminum scrap metal is collected in cardboard Gaylord containers that are located throughout the facility. Each Gaylord container contains between 600-800 pounds of aluminum scrap metal. He stated that DMR generates approximately 20 Gaylord containers of aluminum scrap metal every two months. The aluminum scrap metal is picked up and transported off-site by United for recycling.

Waste Newsprint: Mr. Baum stated that DMR generates one simi-trailer and two 30-cubic-yard roll-off containers of waste newsprint weekly. The waste newsprint is picked up and transported off-site by ABC for recycling.

Spent Lead-Acid Batteries: Ms. Ptak stated that DMR generates approximately one lead-acid battery every three years. She stated that waste lead-acid batteries are exchanged for new batteries at Interstate All Battery Center, Ankeny, Iowa. Based upon Ms. Ptak's description of these transactions, the lead-acid batteries generated within the facility are being exchanged in accordance with the provisions of the 40 CFR §266, Subpart G exemption

Used Oil: Mr. Huyn stated that DMR generates approximately 55-gallons of used oil annually. The used oil is collected in a 55-gallon drum that is located inside the maintenance shop. According to Mr. Baum, the used oil is picked up and transported off-site by Barton for recycling.

4.4 Visual Inspection of Facility Waste Stream Management

A visual inspection of the facility was conducted to observe waste stream management practices and document regulatory compliance. Photographs, checklists, and field notes were used to document observations made during the visual inspection. A Photo Log was created, and photos taken during the inspection appear in Attachment 12.

I observed two open, 55-gallon drums located in the Ink Mixing Room, identified as the HWCAA (Photo 1, Attachment 2). Both containers had open funnels affixed to the top of the drum and both drums were approximately 1/3-full. One 55-gallon drum was labeled "Hazardous" (Photo 2, Attachment 2) and the other was labeled as "Non-Hazardous" waste

(Photo 3, Attachment 2). Mr. Huyn explained that the container labeled "Hazardous" contained a mixture of waste blanket/roller wash and ink and the container labeled as "Non-Hazardous" contained waste ink. I provided compliance assistance regarding container management "Best Practices" and Mr. Huyn closed the funnels affixed to each of the 55-gallon drums.

I observed approximately 11 partially filled five-gallon containers of waste ink pictured in Photo 4, Attachment 2. Mr. Huyn stated that machine operators poured the waste ink into the 55-gallon drum of Non-Hazardous waste at the end of each work shift.

I observed a five-gallon metal step canister full of soiled cloth shop rags in the Press Hall (Photo 5, Attachment 2). Mr. Huyn explained that the soiled cloth shop rags are collected from the metal step canisters and placed in a mobile laundry cart pictured in Photo 6, Attachment 2. The soiled cloth shop rags are transported in the laundry cart to an area outside the maintenance shop where plastic 55-gallon containers are staged for pick up. The soiled cloth shop rags are removed from the laundry cart and placed into the plastic 55-gallon containers. The plastic 55-gallon containers of soiled cloth shop rags are picked up and transported off-site by Aramark for laundering.

I asked Mr. Huyn if he was aware of a HW determination being conducted on the soiled cloth shop rags, to which he responded he was not aware of any such determination. I asked Mr. Baum and Ms. Ptak if they were aware of a HW determination on the soiled cloth shop rags, to which they responded negatively. **DMR must conduct a HW determination on the soiled cloth shop rags contaminated with blanket/roller wash solvent and waste ink in accordance with 40 CFR §262.11, NOPF N0. 1.**

I observed several full cardboard Gaylord containers of scrap aluminum, similar to the container shown in Photo 8, Attachment 2.

I observed a 55-gallon drum used to collect used oil located inside the Parts Storage Room (Photo 9, Attachment 2). The 55-gallon drum was open, was labeled with the words "Used Oil" and had used oil floating on the surface of the lid affixed to the drum. I provided compliance assistance and described Best Practices for cleaning the used oil from the top of the drum. Mr. Huyn cleaned the surface of the drum during this CEI.

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

4.5 Documentation

Prior to this CEI, I reviewed six electronic uniform hazardous waste manifests (UHWM) for HW generated by this facility, spanning the period of April 26, 2019, to present, shown below:

UHWM#	DATE	Description	QTY	Unit	EPA Waste Codes
009848386FLE	4/26/2019	UN1210, Printing Ink Related Material	2	DM	
011999228FLE	10/18/2019	UN1210, Printing Ink Related Material	2	DM	
013922894FLE	1/15/2020	UN1268, Waste Petroleum Distillates	1	DM	D001
013922894FLE	1/15/2020	UN1210, Printing Ink Related Material	1	DM	
013925168FLE	6/8/2020	UN1210, Printing Ink Related Material	2	DM	
014668479FLE	12/2/2020	UN1210, Printing Ink Related Material	2	DM	
012615720FLE	7/13/2021	UN1268, Waste Petroleum Distillates	1	DM	D001
012615720FLE	7/13/2021	UN1210, Printing Ink Related Material	1	DM	

5.0 SUMMARY

The following findings were documented during the previous RCRA CEI conducted on May 3, 2006:

NOPF No. 1: 40 CFR §262.42(b): Failure to submit an exception report within 60 days.

NOPF No. 2: 40 CFR §262.34 and 365: Failure to keep a container of hazardous waste closed.

NOPF No. 3: 40 CFR §262.34(a)(2): Failure to date a hazardous waste container.

I documented the following preliminary finding during this CEI:

NOPF No. 1: 40 CFR §262.11: Conduct a hazardous waste (HW) determination on the cloth shop rags used to clean printing machinery contaminated with blanket/roller wash solvent and ink.

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

HURLEY BRYANT (Affiliate) Digitally signed by HURLEY BRYANT (Affiliate) Date: 2022.04.22 11:54:38 -05'00' Date: 5/25/2022

H. D. “Doug” Bryant, CPP, PCI
Civil Investigator, SEE

_____ Date: _____

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

Attachments:

1) Business Card (1 page)
2) Site Map/Diagram (2 pages)
3) Confidentiality Notice (1 page)
4) Receipt of Document and Samples (1 page)
5) Notice of Preliminary Findings (1 page)
6) Notification Acknowledgement/Verification Report (2 pages)
7) Safety Data Sheet (SDS), MagniTek™ 7000 NA WM (9 pages)
8) SDS, US08-4176 RUBPRUF BLACK (5 pages)
9) SDS, US14-4648 SOY PROCESS RED AD-LITHO (9 pages)
10) SDS, US14-4658 SOY PROCESS BLUE AD-LITHO (9 pages)
11) SDS, US14-4659 SOY PROCESS YELLOW AD-LITHO (9 pages)
12) Photo log (1 page) and Photos (9 pages)