

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

ASTEC BLAIR
237 North 13th Street
Blair, NE 68008
402-426-4181

EPA ID Number: NED007258338

On

January 28, 2025

By

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 (ECAD), I conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Astec Blair located in Blair, Nebraska, on January 28, 2025. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. During the inspection, I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. This inspection report and attachments represent the results of the CEI.

2.0 PARTICIPANTS

Astec Blair:

- Gary Bradshaw, Environmental Health & Safety Coordinator (13 years with company)
- Ron Stamper, Production Supervisor (30 years with company)
- Gary Stillman, Plant Manager (30 years with company)
- Jerry Shafer, Maintenance Technician (10 years with company)

EPA:

- Mark Holcomb, Civil Investigator/Inspector (SEE) - Lead Inspector

Nebraska Department of Environment and Energy (NDEE):

- Mark Henning, Environmental Specialist II-Waste Compliance

3.0 INSPECTION PROCEDURES

On January 28, 2025, Mr. Henning and I arrived unannounced at the facility at about 0930 hours. Initially, we conducted a limited visual reconnaissance of the facility searching for areas of

concern observable from the adjacent public roadways and parking lots. We identified no environmental issues or concerns during this preliminary examination. We entered the facility through the main administrative office entrance. At the front desk, I introduced myself and asked for the Environmental Manager. We were introduced to Mr. Bradshaw, and he escorted us to a conference room in the main office building. There we met Mr. Stamper and Mr. Stillman. Mr. Bradshaw told us that the items of personal protective equipment required for our visual inspection at this facility were protective boots, safety vest, eye protection, helmet, and hearing protection in some areas.

At the opening conference, I presented my EPA ID and credentials. I next explained the purpose and procedures of the inspection. I then presented Mr. Bradshaw with a copy of RCRA Section 3007(a), which provides 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. They were made aware of their confidentiality rights, and I informed them that a Confidentiality Notice would be provided at the end of the inspection to make a confidentiality claim if they so desired. Mr. Bradshaw, Mr. Stamper and Mr. Stillman acted as the official facility representatives during the opening conference, visual inspection, document review, and during the exit conference phases.

The CEI consisted of a discussion of facility operations, waste generation, and waste management; a visual inspection of active waste generation and management areas; and a review of waste management records and documents.

Mr. Henning and I conducted a visual inspection of the following areas:

- Paint Office
- Paint Storage
- Still House
- Apel House (Outdoor Central Accumulation Area - CAA)
- North Lot
- Universal Waste Storage
- Paint Booth
- Maintenance Bay
- West Yard
- Metal Processing

See Attachment #1 for the aerial/map views and facility diagrams. Document photocopies and photographs were collected as inspection documentation (see Attachments #1-15 and Photos 1-21). The photo log is included as Attachment #2. Information collected during the inspection was documented on an Entry/Exit checklist and a hazardous waste compliance checklist. I reviewed documents including the following: safety data sheets (SDS), manifests, invoices, three-year eManifest report, 2023 biennial report, waste stream reports, contingency plan, invoices, analytical reports, National Discharge Elimination System (NPDES) permit, and waste area inspection checklists. I followed the inspection procedures detailed in the RCRA CEI Standard Operating Procedure 2321.01E unless noted otherwise. Any authorized Federal regulatory citations noted in this report are as adopted by reference in the authorized Nebraska regulations.

At the conclusion of the inspection, we summarized our findings and recommendations with Mr. Bradshaw, Mr. Stamper, and Mr. Stillman. I provided Mr. Bradshaw with a Receipt for Documents (see Attachment #3) and a Confidentiality Notice (see Attachment #4), which he signed as an acknowledgment of receipt. No claim of confidential business information was made by Mr. Stillman.

I provided inspection and compliance assistance documents to Mr. Bradshaw, which included the following:

- *RCRA Section 3007(a) (EPA Handout)*
- *Title 18 U.S. Code, Sections 1001 and 1002 (EPA Handout)*
- *Confidentiality Notice (yellow page of the completed carbonless transfer set)*
- *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA In Connection with Inspections (EPA Handout)*
- *Receipt for Documents and Samples (yellow page of the completed carbonless transfer set)*
- *Solvent Stills and Hazardous Waste Counting (NDEE Handout)*

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

Astec Blair (previously known as Concrete Equipment Company, Inc. and also referred to as Con-E-Co on several attachment documents including manifests). The facility produces concrete batch plants, mixers, and material handling systems, and is focused on specialized equipment for asphalt road building, aggregate processing, and concrete production. The facility serves the ready mix, paving, and precast industries, as well as the mining sector with paste back-fill plants. The facility's primary process involves cutting and assembling the specialized steel structures. Astec Blair has been in business since 1957 and was acquired by Astec Industries in 2020. The parent company, Astec Industries is an \$820 million per year in sales, publicly traded international company based in Chattanooga, Tennessee. The Astec Blair facility is about 11 acres, seven buildings, operating two shifts a day Monday-Thursday, with about 170-190 employees. The facility completes about 35 plants (jobs) per year, which requires about 85 semi-truck loads per job to transport. Mr. Bradshaw stated that they have recently started changing their facility name to Astec Blair to conform with the Astec Industries naming convention. Mr. Bradshaw stated that there had been no significant changes, spills, or activations of their emergency plan in the previous three years.

4.2 RCRA Status

Astec Blair had been previously inspected for RCRA compliance on December 16, 2021, by the NDEE. During the 2021 NDEE inspection, Astec Blair was cited for:

1. Failure to maintain:
 - a. job title and name records for positions with hazardous waste management roles

- (as referenced by Title 128, Chapter 19, 004.01);
- b. job descriptions for positions with hazardous waste management roles (as referenced by Title 128, Chapter 19, 004.02);
- c. written descriptions of type and amount of introductory and continuing training for given to each employee with hazardous waste management roles (as referenced by Title 128, Chapter 19, 004.03);
- d. records documenting of type and amount of introductory and continuing training required for each employee with hazardous waste management roles (as referenced by Title 128, Chapter 19, 004.04); and
- e. training records for a minimum of three years for positions with hazardous waste management roles (as referenced by Title 128, Chapter 19, 004.05).

According to RCRAInfo, Astec Blair had most recently notified as a Small Quantity Generator (SQG) on November 25, 2024. They were listed as a Large Quantity Generator (LQG) on their most recent 2023 Biennial Report. I verified the facility address and the site contact information with Mr. Bradshaw on the EPA RCRA Notification Acknowledgement Verification Report (see Attachment #5). Mr. Bradshaw stated that he estimates they generate about 1,400-1,500 pounds of hazardous waste monthly, and that they had decreased from a LQG to a SQG by use of the solvent still. Based on the review of recent uniform hazardous waste manifests, I determined that Astec Blair routinely generates D001, D003, D035, D039, F003, and F005 hazardous waste. I determined the facility generates hazardous waste at the SQG level (between 100 and 1,000 kg or between 220 and 2,200 pounds per month) and inspected the facility as an SQG. In addition, I inspected the facility as a small quantity handler of universal waste and as a generator of used oil.

4.3 Facility Waste Streams and Management

Mr. Bradshaw stated that the following are waste streams generated at Astec Blair:

Waste Paint and Solvent - This waste stream was listed as “paint sludge” on drum labels and “UN1993 Waste Flammable Liquids” on uniform hazardous waste manifests (see Attachment #6). This waste stream had been determined to be D001, D035, F003, and F005 hazardous waste based on product and process knowledge (see Attachment #8 for the paint SDS). One 55-gallon drum of 641 pounds was shipped on the December 11, 2024, manifest. The 2023 Biennial Report indicated that of the total 38,197 pounds of waste paint related materials generated, 20,080 pounds (52%) was recovered by use of the still in their solvent recovery process. Mr. Bradshaw stated that they increased the amount of waste solvent processed in the solvent still to produce hazardous secondary materials (HSM) that is reused in 2024, and they have a new solvent still that has been installed and is pending startup in 2025 (see Photo 3). In the Paint Storage Room, I observed a 55-gallon satellite accumulation drum of paint sludge, that was about $\frac{3}{4}$ full, with a closed and latched funnel top (see Photos 1-5). The drum was properly labeled with “Hazardous Waste” and “Flammable.” The 55-gallon drum of paint and solvent, was about $\frac{1}{4}$ full, closed, and properly labeled. The drum contents were pending transfer to the still (solvent recovery system) for reclaiming and was labeled as “hazardous secondary material (HSM) for recycling.” There was also a full 55-gallon drum of paint and solvent labeled as “hazardous secondary material (HSM) for recycling.” The drum was in

good condition, closed, and properly labeled. In the Paint Booth, I also observed the paint gun cleaning system (see Photos 11-15). In the Outside West Area, just northwest of the Paint Booth, I observed two hazardous waste storage sheds. The shed on the left was the “Still House” and contained the operational still, which was running at the time of our inspection. Photo 5 is a view inside the Still House showing the silver still (solvent recovery system) pulling from the black 55-gallon drum, which was about ¼ full. The 55-gallon blue drum in the foreground was collecting the reclaimed solvent. Both drums were closed, in good condition, and properly labeled. Mr. Bradshaw provided a “solvent reclaim log” (see Attachment #7), which documented compliance with the Nebraska hazardous secondary materials requirements as outlined in the NDEE handout: *Solvent Stills and Hazardous Waste Counting*. This waste stream is shipped monthly by Heritage Transport Inc. (Indianapolis, Indiana) to Rineco (Benton, Arkansas) for H061 processing (fuel blending prior to energy recovery).

Still Bottoms - This waste stream was listed as “UN1263 Waste Paint Related Materials” on uniform hazardous waste manifests (see Attachment #6). This waste stream had been determined to be D001, D035, F003, and F005 hazardous waste based on product and process knowledge. Two 55-gallon drums (604 pounds) were shipped on the December 11, 2024, uniform hazardous waste manifest. The 2023 Biennial Report indicated that a total of 9,313 pounds of still bottoms were generated. In the Apel House Storage Shed, I observed two 55-gallon drums of still bottoms. Both drums were closed, in good condition, labeled with the words “Hazardous Waste,” and dated within 180 days (less than 30 days) (see Photo 6). This waste stream is shipped monthly by Heritage Transport Inc. (Indianapolis, Indiana) to Rineco (Benton, Arkansas) for H061 processing (fuel blending prior to energy recovery).

Solvent Contaminated Rags - This waste stream was listed as “UN3175 Waste Solids Containing Flammable Liquid” on uniform hazardous waste manifests (see Attachment #6). This waste stream had been determined to be D035, F003, and F005 hazardous waste based on product and process knowledge. One 55-gallon drum of 204 pounds was shipped on the December 11, 2024, uniform hazardous waste manifest. The 2023 Biennial Report indicated that a total of 6,202 pounds of solvent rags were generated. In the Apel House Storage Shed, I observed a one full 55-gallon CAA drum of “oily rags.” The drum was closed, in good condition, labeled with the words “Hazardous Waste,” and dated within 180 days (less than 30 days) (see Photo 6). This waste stream is shipped monthly by Heritage Transport Inc. (Indianapolis, Indiana) to Rineco (Benton, Arkansas) for H061 processing (fuel blending prior to energy recovery).

Spent Aerosol Cans - Astec Blair generates about a dozen spent or partially spent aerosol cans per year from painting operations. Some aerosol cans are punctured and drained in the Paint Booth. Some aerosol cans are disposed of in the spent aerosol can 55-gallon drum in the CAA (Apel Storage Shed). The waste paint and spent aerosol cans were determined to be D001 and D003 characteristic hazardous waste. The 2023 Biennial Report indicated a total of 136 pounds shipped in 2023. In the Paint Booth, I observed an aerosol can puncturing station with a 55-gallon collection drum. The 55-gallon satellite accumulation drum was about ¼ full, closed, in good condition and properly labeled with the words “Hazardous Waste.” Mr. Bradshaw stated that since it accumulates very slowly, the drum is replaced every 90 days. The accumulation start

date on the drum was 1/5/2025 (within 180 days) (see Photo 14). In the Apel Storage Shed, I observed a 55-gallon hazardous waste satellite accumulation drum of non-puncturable spent aerosol cans, which was about 1/3 full, and had an accumulation start dated of 10/2/2023 (see Photos 7-8). This waste stream is shipped as needed by Heritage Transport Inc. (Indianapolis, Indiana) to Rineco (Benton, Arkansas) for H061 processing (fuel blending prior to energy recovery).

Spent Parts Washer Solvent - Astec Blair generates about 42 gallons of spent parts washer solvent per year. They operate two 10-gallon parts washers using the Safety-Kleen Premium Gold solvent (ignition point above 140 degrees F). This waste stream had been determined to be D039 hazardous waste based on product and process knowledge. The parts washers are serviced by Safety Kleen Systems, Inc. Services (Omaha, Nebraska) every six months. The uniform hazardous waste manifest dated May 16, 2024, indicated 21 gallons of spent parts washer solvent was shipped (see Attachment #9). The 2023 Biennial Report indicated a total of 435 pounds shipped in 2023. In the Maintenance Bay, I observed one of the parts washers (see Photo 17). No concerns were noted.

Spent Paint Booth Air Filters - Astec Blair generates about 22 (four-foot by six-foot) paint booth air filters per month. The air filters were determined to be non-hazardous based on analytic testing (see Attachment #10). The spent air filters are disposed of monthly in the general trash (see Photos 11-13).

Used Oil and Used Oil Filters - Astec Blair generates about 200-300 gallons of used oil annually from preventive maintenance of equipment and vehicles in the plant. The used oil is stored in a 250-gallon underground tank in the Maintenance bay. The used oil is collected by Jebro Inc. (Sioux City, Iowa) every six months and recycled. Used oil filters (about 15-20 per year) are punctured, hot drained and recycled as scrap metal. In the Maintenance Bay, I observed the 250-gallon underground tank, which was about $\frac{3}{4}$ full of used oil. Mr. Shafer was present to explain the used oil handling process. The tank fill port was labeled with the words "Used Oil" and the top of the tank appeared to be in good condition with no obvious damage or leaks (see Photo 16).

Universal Waste - Astec Blair generates a variety of universal wastes. Mr. Bradshaw stated that the waste management company, The Retrofit Companies (Owatonna, Minnesota), had just collected and transport all their universal waste a few days earlier and that the Universal Waste Storage Area was empty. The bill of lading (see Attachment #11) was dated January 22, 2025, and indicated they had shipped a small number of lithium batteries, alkaline batteries, nickel-cadmium batteries, four 4-foot fluorescent lamps, and a few electronics parts. See Photo 10 for a view of the empty storage area. All the empty containers had new universal waste labels with an updated accumulation start dates of 1/27/2025 (the day before this inspection).

Waste Steel and Steel Laser Dust - Astec Blair generates about one 55-gallon drum of steel laser dust every two weeks from plasma laser cutting operations from the north side of the Metal Processing Building and about one 55-gallon drum twice a year from the south side of the Metal Processing Building. Mr. Bradshaw estimated that each drum was about 125 pounds. The steel dust was determined to be non-hazardous based on product and processing knowledge. The steel

laser dust is collected in bag houses and deposited into the 55-gallon drums (see Photos 20-21). The steel dust is transported every two weeks to Hanner (Blair, Nebraska) for recycling. Scrap metal is also collected in a 12-cubic yard roll-off in the West Yard (see Photo 19) and picked up twice a month by Hanner.

Wastewater and Pit Sludge - Astec Blair generates wastewater and about 1,450 pounds of pit sludge annually from sanding, buffing and cleaning operations in the wash bay area next to the paint booth. Both the wastewater and pit sludge are determined to be non-hazardous based on analytical testing. See Attachment #12 for the Pit Sludge Material Information Summary. The pit sludge is shipped off-site annually by Heritage Transport Inc. (Indianapolis, Indiana) to Rineco (Benton, Arkansas) for landfill disposal. See Attachment #13 for January 13, 2025, Wastewater Analytics Report, Authorization to Discharge Under Nebraska Pretreatment Program, and the NPDES Permit.

General Trash and Recyclable Cardboard - Astec Blair generates about 50 cubic-yards of trash and cardboard monthly from general business and plant operations. General trash is collected in 12, eight and four cubic-yard dumpsters (see Photos 9 and 18). The trash is collected every two weeks by Abe's Trash (Omaha, Nebraska) and disposed of in the local landfill.

4.4 Other Areas Reviewed

Outside Facility Perimeter - We conducted a limited inspection of the outside perimeter of the facility and observed no hazardous waste storage tanks or containers except as noted above. See the aerial and map views in Attachment #1.

CAA - The Apel House Storage Shed (outside northwest of the Paint Booth) serves as the primary CAA. There were "No Smoking" signs, adequate spill kits, fire control equipment, and a fire sprinkler system (see Photos 1 and 6-8). Emergency contact information was posted on the door to the Paint Office less than 40 feet from the CAA, and in the readily available Contingency Plan. I also reviewed the past several weeks of CAA Weekly Inspection Checklists (see Attachment #14 for a completed checklists) with no issues noted.

Preparedness and Prevention - The facility has numerous fire extinguishers, spill kits, and eye wash stations. Mr. Bradshaw provided a copy of the facility's Contingency Plan (see Attachment #15). The plan appeared to be up to date, contained all the required components, and had been shared with local emergency responders.

SQG Personnel Training - Mr. Bradshaw stated that all staff with hazardous and universal waste handling responsibilities receive both initial and annual training.

Uniform Hazardous Waste Manifests and Land Disposal Restrictions (LDR). We reviewed the e-manifest shipments, and all the paper copies of manifests and LDRs over the previous two years. No issues were noted.

5.0 SUMMARY OF FINDINGS

No preliminary findings or compliance issues were observed at the time of the inspection. However, further EPA review may include findings.

MARK HOLCOMB
(Affiliate)

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Mark Holcomb
Civil Investigator, SEE

AMBER WHISNANT

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Amber Whisnant
RCRA Section Chief, ECAD/Chemical Branch

Attachments:

- 1) Facility Aerial Map Views and Diagrams (5 pages)
- 2) Photo Log (21 photos and 24 pages)
- 3) Receipt for Documents (1 page)
- 4) Confidentiality Notice (1 page)
- 5) EPA RCRA Notification Acknowledgement/Verification Report (2 pages)
- 6) Manifest - Heritage (8 pages)
- 7) Solvent Reclaim Logs (1 page)
- 8) SDS - Paint (15 pages)
- 9) Manifest - Parts Washer Solvent (1 page)
- 10) TCLP - Paint Booth Air Filters (13 pages)
- 11) Universal Waste Bill of Lading (1 page)
- 12) Pit Sludge Material Information Summary (13 pages)
- 13) Wastewater Analytics Report, Authorization to Discharge Under Nebraska Pretreatment Program, and the NPDES Permit (14 pages)
- 14) CAA Weekly Inspection (3 pages)
- 15) Contingency Plan (34 pages)