

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

IOWA ARMY NATIONAL GUARD – FMS 2

3106 Airport Boulevard
Waterloo, Iowa 50703-9700
515-252-4557

EPA ID Number: IAD981504178

On

May 1, 2024

By

TOEROEK ASSOCIATES, INC.

For

U. S. ENVIRONMENTAL PROTECTION AGENCY

Region 7

Enforcement and Compliance Assurance Division

INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division/Chemical Branch/RCRA Section (ECAD/CB/RCRA) of the U. S. Environmental Protection Agency (EPA) Region 7, Toeroek Associates, Inc., and its subcontractor CLAENE Group (Toeroek team) conducted a hazardous waste compliance evaluation inspection (CEI) at Iowa Army National Guard (IAANG) Field Maintenance Center No. 2 (FMS-2) at 3106 Airport Boulevard in Waterloo, Iowa. The CEI was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. The CEI covered hazardous waste generator requirements, used oil management, and universal waste requirements, as applicable. This report and its attachments present the results of the CEI.

PARTICIPANTS

IAANG FMS-2:

Shannan Garretson, Environmental Program Manager (Remote)
SSG Joshua Palmer, FMS-2
Joseph Fraley, Supply Technician FMS-2
Duane Parizek, Primary Environmental Clerk /ECL – FMS-2
Caleb Erickson, Alternate Environmental Clerk/ECL – FMS-2

Toeroek Team:

Steve A. Johnson, Inspector, 816-520-7009

INSPECTION PROCEDURES

Prior to the CEI at IAANG FMS-2 on May 1, 2024, I conducted a drive-by visual inspection of the campus and contiguous properties. I did not observe any areas of concern during the perimeter survey. Upon my arrival, I approached the security checkpoint at the main entrance, identified myself, and explained the purpose of my visit. The Guardsman acknowledged my request and began contacting the requisite personnel. Upon conclusion of her attempts, I was informed that the Environmental Program Manager, Ms. Garretson, and the Senior Environmental Specialist, Ms. Lena Douglas, were both posted at Camp Dodge in Johnston, Iowa, and were unavailable to attend the site inspection. After alternate facility representatives were confirmed, Staff Sergeant (SSG) Palmer met me at the security checkpoint and escorted me to the FMS-2 Building located on the east-central portion of the campus. I asked that messages be left with Mses. Garretson and Douglas advising them of the inspection and my intention to follow up with their offices after the inspection.

I met Messrs. Fraley and Parizek at the FMS-2 Building and conducted an entry briefing with them. During the entry briefing, I presented my EPA credentials to Messrs. Fraley and Parizek and explained the scope and procedures for the CEI. I explained the facility's right to make confidentiality claims for any or all the information obtained and provided a Notice Regarding Proprietary/Confidential Business Information. I stated that at the conclusion of the CEI, they would be presented with a Confidentiality Notice (Notice) with which they could make or not make a claim of confidentiality for the facility. Mr. Fraley asked that the Confidentiality Notice be sent to Ms. Garretson for signature by an authorized officer. I then provided Messrs. Fraley and Parizek a copy of U.S. Federal Codes 1001 and 1002, concerning communication of false statements and documents to federal inspectors, and RCRA Section 3007, explaining EPA's inspection authority, both of which they read and retained.

A copy of each of the following documents was forwarded to Ms. Garretson via electronic media following the inspection:

- RCRA Facility Access Information Sheet
- RCRA Section 3007
- U.S. Federal Codes 1001 and 1002
- Instructions for Responding to a Notice of Preliminary Findings
- Notice Regarding Proprietary/Confidential Business Information
- E-Manifest Fact Sheet: Generators
- Managing your Hazardous Waste: A Guide for Small Businesses
- U.S. EPA Small Business Resources Information Sheet
- Solvent-Contaminated Wipes Final Rule Summary Chart
- IDNR Excluded Solvent-Contaminated Wipes Rule: Management Practices for Wipes, Rags, and Shop Towels
- Recycling Electronics: A Guide for Businesses
- Lead-Based Paint Activities: Handling and Disposal
- Battery Recycling/Disposal
- Management of Fluorescent Lamps for Businesses
- Incompatible Chemicals
- Universal Wastes – Including Aerosol Cans

- TCLP – Toxicity Characteristic Leaching Procedure
- Part 279 Requirements: Used Oil Management Standards
- EPA Region 7 Emergency Response Program
- Chemical Facility Anti-Terrorism Standards
- Iowa Environmental Guide for Businesses

I reviewed the Notification Acknowledgement/Verification Report (Verification Report) with Ms. Douglas following the CEI (Attachment 1). Based on this review, I made the following changes to the verification report.

- The server exchange for the National Guard was recently changed from @mail.mil to @army.mil. Ms. Garretson's email address in the Site Contact Information section of the Verification Report was edited to reflect the change.
- The facility's hazardous waste generator status was changed from small quantity generator (SQG) to very small quantity generator (VSQG).

I conducted a visual inspection of the facility. Messrs. Fraley and Parizek accompanied me during the visual inspection. Following the visual inspection, I completed my review of facility records including uniform hazardous waste manifests with land disposal restriction (LDR) notifications, bills of lading and service receipts, and safety data sheets (SDS). I prepared and completed a site-specific inspection checklist to document my observations.

At the conclusion of the CEI on May 1, 2024, I conducted an exit briefing with Messrs. Fraley and Parizek. I prepared a Receipt for Documents and Samples and the Notice, which were electronically routed to Ms. Garretson. Due to email inaccuracy, the documents were not received until May 22, 2024. Ms. Garretson signed the Receipt for Documents and Samples on May 22, 2024, acknowledging receipt (Attachment 2). She also signed the Notice, indicating no confidential business information had been provided (Attachment 3). I made no preliminary findings during the CEI, so a Notice of Preliminary Findings (NOPF) was not left with the facility at the conclusion of the CEI on May 1, 2024.

Site layout and FMS-2 building maps were obtained during the CEI and are included in Attachment 4. An aerial photograph of the facility was downloaded after the CEI and is in Attachment 5. The 22 photographs taken during the CEI are included in Attachment 6, of which 21 are described in this report.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

IAANG FMS-2 is a regional maintenance facility serving the satellite National Guard sites (Attachment 6, Photographs 21 and 22). It is owned by the State of Iowa and operated by the Army National Guard as FMS-2. The facility provides maintenance of mobile equipment used by Army National Guard sites. According to personnel, construction at the site began in 1966 and the site was occupied in 1972. IAANG encompasses approximately 12.7 acres, and currently has 13 full-time personnel and one contract service worker who work one shift (6:00 a.m. to 4:00 p.m. or 8:00 a.m. to 5:00 p.m., depending on job assignment) Monday through Friday.

Activities performed at FMS-2 include vehicle and equipment maintenance (including touchup painting) and facility maintenance. Hazardous waste determinations are made for wastes generated at the facility based on product and process knowledge. The facility utilizes jet fuel, instead of gasoline or diesel fuel, in 99% of the vehicles at the facility. No aviation maintenance is performed at the facility.

Vehicle and equipment maintenance activities generate waste flammable liquid, hazardous waste solids, hazardous waste liquid, used oils, waste aerosols, and waste batteries. Waste flammable liquid consists of fuels generated from changeout of fuel tanks and systems, hazardous waste solids consists of spill cleanup debris and other solids contaminated with fuels, and hazardous waste liquid consists of lead-containing fuels, rinseate, and used antifreeze. The facility manages each of these wastes as hazardous based on product and process knowledge. Used oils generated during vehicle service and repair work is managed according to provisions of Title 40 *Code of Federal Regulations* (40 CFR) Part 279. Waste aerosols and small waste batteries are managed as universal waste according to provisions of 40 CFR Part 273. Larger lead-acid batteries are managed according to provisions of 40 CFR Part 266 Subpart G, and are collected for offsite reclamation.

Facility maintenance generates waste lamps, spent aqueous parts washer wastewater, used rags, and general trash. Waste lamps are managed as universal waste according to provisions of 40 CFR Part 273. Spent aqueous parts washer wastewater is generated during contractor servicing of the parts washers, and is considered nonhazardous based on product and process knowledge. General trash and used rags are considered to be nonhazardous waste based on product and process knowledge. Nonhazardous wastes are collected for disposal at the Black Hawk County Landfill.

2. RCRA Status

The Verification Report (Attachment 1) indicates that IAANG FMS-2 is registered with EPA, under EPA RCRA identification number IAD981504178, as a SQG of hazardous waste (generating between 220 pounds or 100 kilograms [kg] and 2,200 pounds or 1,000 kg of hazardous waste per month). During the CEI, I reviewed manifests and current operations to determine the hazardous waste generator status.

IAANG FMS-2 generates hazardous waste continuously through the year. Hazardous waste is accumulated in 55-gallon containers. Full containers are shipped off site approximately two times per year. The last three shipments of hazardous waste occurred in January 2023, June 2023, and December 2023 (Attachment 7). I considered the waste shipped off site in January 2023 to consist of waste primarily generated in 2022. Therefore, I used hazardous waste quantities from the June 2023 and December 2023 manifests to determine the facility's generator status.

A total of 400 pounds of hazardous waste was shipped off site in June 2023, and a total of 910 pounds of hazardous waste was shipped off site in December 2023. Based on statements from the facility, hazardous waste is generated at a consistent rate over time. The estimated generation rate for the month of April 2024 is based upon observed waste volumes in accumulation and

facility operator statements. The estimated rate of generation is reported as approximately 80 pounds (36.2 kilograms) for the month of April 2024. The total for the year (1,310 pounds) divided by 12 months equals an average monthly generation rate of approximately 109 pounds of hazardous waste per calendar month, assuming that hazardous waste is generated at a consistent rate rather than in batches. Therefore, I determined that IAANG FMS-2 is operating as a VSQG of hazardous waste (generating less than 220 pounds or 100 kg of hazardous waste per month). I also inspected the facility as a generator of used oil and a small quantity handler (SQH) of universal waste (accumulating less than 5,000 kg of universal waste at any time).

3. Waste Streams

This section of the CEI report describes the waste streams generated by the facility, including the facility's waste determination and waste codes, generation process and rate, management at the facility, and ultimate disposition. The following discussion of waste streams is based on conversations with facility representatives, the visual inspection, and my review of waste shipping documents.

Waste flammable liquid (fuels) consists of fuel generated during changeout of fuel tanks and fuel systems. The facility considers the waste to be hazardous (D001, D018) based on product and process knowledge. Based on the manifests for wastes generated in 2023, the facility generates approximately 820 pounds of waste flammable liquid per year. The waste is accumulated in 55-gallon containers in the FMS-2 building. Full containers are transferred to a waste storage shed southeast of the building. Waste flammable liquid is transported to Philip Reclamation Services in Houston, Texas, or RINECO Chemical Industries in Benton, Arkansas, for fuel blending.

During the CEI, I observed a 55-gallon container for accumulation of waste flammable liquid in the FMS-2 building (Attachment 6, Photographs 13 and 15). The container was structurally sound, closed, labeled with the words "hazardous waste" and "waste fuel." The waste storage shed southeast of the building was empty at the time of the CEI (Attachment 6, Photograph 20). I noted no deficiencies with management of waste flammable liquid during the CEI.

Hazardous waste solids consists of spill cleanup debris and other solids contaminated with fuels. The facility considers the waste to be hazardous (D001) based on product and process knowledge. Based on the manifests for wastes generated in 2023, the facility generates approximately 100 pounds of hazardous waste solids per year. The waste is accumulated in 55-gallon containers in the FMS-2 building. Full containers are transferred to a waste storage shed southeast of the building. Hazardous waste solids are transported to Philip Reclamation Services in Houston, Texas, or RINECO Chemical Industries in Benton, Arkansas, for fuel blending.

During the CEI, I observed spill response materials readily available for use in the FMS-2 building (Attachment 6, Photograph 2). I did not observe hazardous waste solids in accumulation at the time of the CEI.

Used oils are generated during routine maintenance and repair of vehicles and equipment. Used oil is also generated through crushing of used oil filters. The facility manages used oils according to requirements of 40 CFR Part 279. According to shop operators, the facility generated

approximately 740 gallons in 2023. Used oils are collected and transferred to a 55-gallon used oil storage container or a 280-gallon used oil storage tank. The waste is collected by Safety-Kleen and transported to Safety-Kleen in Des Moines, Iowa, for recycling (Attachment 8).

During the CEI, I observed the used oil filter crusher (Attachment 6, Photograph 16). The crusher was in good condition, and the 35-gallon used oil storage container beneath the crusher was in good condition and labeled with the words “used oil.” Crushed used oil filters are accumulated in an adjacent 55-gallon container for collection by Safety-Kleen (Attachment 6, Photograph 17).

I also observed the 280-gallon used oil storage tank (Attachment 6, Photograph 18). The used oil storage tank was in good condition, with no evidence of leaks, and labeled with the words “used oil.” I noted no deficiencies with management of used oil during the CEI.

Hazardous waste liquid consists primarily of waste antifreeze, but also includes lead-containing fuels and rinsates. I reviewed the SDS for antifreeze and noted that the unused product does not contain lead (Attachment 9). However, IAANG FMS-2 considers waste antifreeze to be lead containing after use, and all potentially lead-containing liquids are accumulated in the same hazardous waste liquid container. The facility considers hazardous waste liquid to be hazardous (D008) based on product and process knowledge. Based on the manifests for wastes generated in 2023, the facility generates approximately 390 pounds of hazardous waste liquid per year. The waste is accumulated in 55-gallon containers in the FMS-2 building. Full containers are transferred to a waste storage shed southeast of the building. Hazardous waste liquid is transported to RINECO Chemical Industries in Benton, Arkansas, for bulking and offsite transfer.

During the CEI, I observed a 55-gallon container for accumulation of hazardous waste liquid in the FMS-2 building (Attachment 6, Photographs 14 and 15). The container was structurally sound, closed, labeled with the words “hazardous waste” and “waste antifreeze.” The waste storage shed southeast of the building was empty at the time of the CEI. The waste storage shed southeast of the building was empty at the time of the CEI. I noted no deficiencies with management of hazardous waste liquid during the CEI.

Spent aqueous parts washer wastewater is generated during maintenance of three aqueous parts washers (Hotsy 7230A, Better Engineering G-2000 (1 unit), CUDA H20-2518) that use water with ArmaKleen detergent in the Wash Bays. The facility considers the wastewater nonhazardous based on product and process knowledge. No estimates were provided for the volume of this wastewater in 2023. The wastewater from parts washers is not accumulated on-site; it is pumped directly to a tanker truck during parts washer servicing. The wastewater is transported by the service contractor for pretreatment prior to disposal into the sanitary sewer system.

I observed the aqueous parts washers during the CEI (Attachment 6, Photographs 11 and 12). I also reviewed the SDSs for the parts washer cleaning compounds used (Attachment 10). I noted no deficiencies with spent aqueous parts washer wastewater during the CEI.

Waste aerosols are generated by maintenance, painting and lubricating applications. IAANG FMS-2 manages waste aerosols as universal waste according to requirements of 40 CFR Part 273. The facility generates approximately 15 pounds of waste aerosol cans per month. Waste aerosol cans are accumulated in 55-gallon universal waste accumulation containers in the FMS-2 building. Full containers are transported to the Camp Dodge installation in Johnston, Iowa, for aggregation prior to recycling.

During the CEI, I observed a 55-gallon container of waste aerosol cans in the FMS-2 building (Attachment 6, Photographs 7 through 9). The container was structurally sound, approximately half full, labeled with the words “universal waste aerosol cans” and dated August 28, 2023. I noted no deficiencies with management of waste aerosols during the CEI.

Waste batteries are generated during vehicle and equipment maintenance. Large automotive lead-acid batteries are managed according to provisions of 40 CFR Part 266 Subpart G. Smaller non-automotive waste batteries are managed as universal waste according to requirements of 40 CFR Part 273. The generation rate for waste batteries was not determined during the CEI. Large lead-acid batteries are collected by Interstate Battery Service for reclamation. Universal waste batteries are transported to the Camp Dodge installation in Johnston, Iowa, for aggregation prior to recycling.

During the CEI, I observed a pallet with three waste lead-acid batteries (Attachment 6, Photograph 1). The batteries were structurally sound with no evidence of leaks. I also observed a 5-gallon container of universal waste batteries (Attachment 6, Photograph 3). The container was structurally sound, labeled with the words “universal waste” and “batteries,” and dated September 21, 2023. I noted no deficiencies with management of waste batteries during the CEI.

Waste lamps are generated during facility lighting maintenance and consist of used fluorescent, compact fluorescent, and high intensity discharge (HID) lamps. Waste lamps are managed as universal waste according to requirements of 40 CFR Part 273. According to site personnel, the facility generates less than 80 pounds of waste lamps per year. Waste lamps are transported to the Camp Dodge installation in Johnston, Iowa, for aggregation prior to recycling.

During the CEI, I observed two universal waste accumulation containers for waste lamps in the Storage Room (Attachment 6, Photographs 4, 5 and 6). Both containers were structurally sound, closed, labeled with the words “universal waste” and “lamps,” and dated. The oldest container was dated June 1, 2023. I noted no deficiencies with management of waste lamps during the CEI.

Spill debris is generated from cleanup of spills of fuel, oil, and antifreeze throughout the facility shops. The waste is collected in 55-gallon containers. Full containers are transferred to a roll off container outside of the building adjacent to the Hi-Bay structure. The facility considers spill debris to be nonhazardous based on product and process knowledge. Spill debris is transported to the Black Hawk County Landfill for landfill disposal under a Special Waste Authorization (SWA). I did not review the SWA during the CEI. I observed a single 55-gallon container of spill debris during the CEI (Attachment 10, Photograph 10) and noted no deficiencies.

General trash and used rags consists of rags used for general wipe cleaning of nonhazardous material, debris from cleanup of nonhazardous spills, packaging wastes and general office-type refuse. The facility considers the wastes to be nonhazardous based on product and process knowledge. The facility has a Special Waste Authorization for spill debris. General trash and used rags are collected in dumpsters. Spill debris is collected in 55-gallon containers in the FMS-2 building and added to the dumpsters when containers are full. The waste is transported to the Black Hawk County Landfill for disposal.

During the CEI, I observed a 55-gallon container used to accumulate nonhazardous spill debris (Attachment 6, Photograph 10). I also observed collection of general trash and used rags throughout the facility. I noted no concerns with management of the waste during the CEI.

4. Summary of Preliminary Findings

In summary, I made no preliminary findings during the CEI.

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

Steve A.
Johnson

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Steve A. Johnson, Inspector
CLAENE Group

AMBER WHISNANT

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

Attachments:

1. Notification/Acknowledgement Verification Report (2 pages)
2. Receipt for Documents and Samples (1 page)
3. Confidentiality Notice (1 page)
4. Site Maps (4 Pages)
5. Google Earth Aerial Photograph (1 page)
6. Photographic Documentation (Photolog and 22 Photographs) (13 pages)
7. 2023 Uniform Manifests and LDR notices (24 pages)
8. Used Oil Service Receipt (2 Pages)
9. SDS for Product Antifreeze (9 Pages)
10. SDS for Three Aqueous Cleaning Compounds (10 pages)