

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

INFASTECH DECORAH LLC

1302 Kerr Drive
Decorah, Iowa 52101
563-387-3233

EPA ID Number: IAD053737532

On

June 15, 2022

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 Tetra Tech Inc. (Toeroek team) conducted a hazardous waste compliance evaluation inspection (CEI) at Infastech Decorah LLC (Infastech), at 1302 Kerr Drive in Decorah, 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 findings of the CEI.

PARTICIPANTS

Infastech:

Tim Behrens, Environmental Health and Safety (EHS) Manager
Jeff Brower, Director of Operations
Scott Monroe, EHS Technician
Lindsey Toole, Environmental Compliance for Stanley Engineered Fastening (by telephone)
Jackie Molina, Governance Director for Stanley Engineered Fastening (by telephone)

Toeroek Team:

Heather K. Wood, Inspector, 816-412-1768

INSPECTION PROCEDURES

Prior to the CEI at Infastech on June 15, 2022, I conducted a drive-by inspection. I did not observe any areas of concern during the drive-by. Upon my arrival at 8:30 a.m., I entered the visitor's entrance and explained the purpose of the CEI to the reception attendant. The reception attendant contacted Mr. Behrens, who met me at the entrance. I introduced myself to Mr. Behrens and explained the purpose of the CEI to him. He escorted me to Mr. Brower's office, where we met Mr. Brower. We were joined there by Mr. Monroe in person and Ms. Toole by telephone. I conducted an entry briefing there.

During the entry briefing, I presented my business card and EPA credentials to the group. I explained the scope of the CEI and the data gathering procedures that would be employed (for example, interviews, visual inspection, records review, and digital photography). I then informed them of the facility's right to make confidentiality claims for any or all of the information obtained. I stated that at the conclusion of the CEI, they would be presented with a Confidentiality Notice (Notice) with which the facility could make or not make a claim of confidentiality for the facility. I also provided them 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.

A copy of each of the following documents was left with the facility during the inspection:

- RCRA Facility Access Information Sheet
- Mr. Trevor Urban's business card
- 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
- Managing your Hazardous Waste: A Guide for Small Businesses
- U.S. EPA Small Business Resources Information Sheet
- Industry Sector Notebooks
- Environmental Compliance Assistance Centers
- RCRA Online: A Quick Reference Guide

- Part 279 Requirements: Used Oil Management Standards
- EPA Region 7 Emergency Response Program
- Commercial Motor Vehicle Transportation System Security and Safety
- Security Awareness
- Chemical Facility Anti-Terrorism Standards

I reviewed the Hazardous Waste Site Info Verification Report (Verification Report) with Mr. Behrens (Attachment 1). Based on this review and observations during the CEI, I updated the site contact information; removed large quantity handler of universal waste from the types of regulated activity; added small quantity handler (SQH) of universal waste and used oil generator to the types of regulated activity section of the report. I asked Mr. Behrens about the exempt small quantity hazardous waste burner activity identified on the Verification Report. This activity had been re-selected on the facility's notification associated with the 2021 Biennial Report, which I had reviewed before the inspection. Mr. Behrens said that this was an error, that the facility did not burn hazardous waste, and that he did not think the facility had ever burned hazardous waste. I recommended that the facility re-notify to correct this, and I removed the activity from the Verification Report. I also removed the D010 and F039 waste codes. According to Mr. Behrens, the facility does not have F039 leachate. He said that the facility had recently switched to virgin parts washer solvent from recycled parts washer solvent. The recycled parts washer solvent carried a D039 waste code. The listing of the F039 waste code was likely a typographic error.

I conducted the visual inspection of the facility, accompanied by Mr. Behrens and Mr. Monroe. I reviewed available facility records, including manifests with land disposal restriction (LDR) notifications, waste profile and analytical testing records, safety data sheets (SDS), inspection records, emergency procedures documentation, and other documentation related to waste generation and management. Facility information gathered during the CEI is documented on the Data Gathering Worksheets and Checklists (Attachment 2).

At the conclusion of the CEI, I conducted an exit briefing with Mr. Behrens, Mr. Monroe, and Mr. Brower in person and Ms. Molina by telephone. During the exit briefing, I provided a Receipt for Documents and Samples, which Mr. Brower signed, acknowledging receipt (Attachment 3). I provided Mr. Brower the Notice, which he signed indicating no confidential business information had been provided (Attachment 4). I provided Mr. Brower a Notice of Preliminary Findings (NOPF), which he signed to acknowledge receipt (Attachment 5).

A facility map obtained during the CEI is included in Attachment 6. An aerial photograph of the facility was downloaded after the CEI and is included in Attachment 7. The 28 photographs taken during the CEI are included in Attachment 8.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

Infastech manufactures a variety of customer-specific metal fasteners. Raw materials used by Infastech include wire, oils, lubricants, paint, solvents, acids, and soaps. The facility began

operations at this location in approximately 1969. The facility is owned by Stanley Engineered Fasteners, doing business as Infastech.

Infastech currently employs approximately 320 full-time staff. The facility runs three 8-hour shifts to cover 24 hours, Monday through Friday. The Infastech production facility in Decorah includes four buildings on the contiguous property (Attachments 6 and 7). The east and west buildings house production areas and offices (called the North Manufacturing Building and the Heat Treat and Finishing Building). The South Manufacturing Building houses production areas and packaging. The Wire Storage Building houses the Sorting, Packing, and Warehouse areas and the Consignment Raw Material area. Infastech occupies an area of approximately 250,000 square feet under roof and 32 acres total.

Fasteners are manufactured starting with a coil of wire, including carbon steel, stainless steel, brass, and aluminum. At each production area, wire is fed into a wire drawer to a header machine. The header machine cuts the wire to the specified length for the fastener and puts a head on the fastener. After the header machine, the fasteners go to secondary machines—threaders, shavers, and grinders. Metal shaping at the facility generates used cutting and quenching oil and used oil debris, which the facility manages as used oil. Metal shaping also generates nonhazardous metallic sludge, which includes oily absorbents, metallic baghouse dust generated during grinding, and metallic sludge collected from oil tanks. Scrap metal is generated throughout the manufacturing process. It is recycled, and therefore considered exempt from the definition of hazardous waste per Title 40 *Code of Federal Regulations* (40 CFR) 261.4(a)(13). These processes also generate oily rags, which are not considered waste by the facility because they are laundered and reused.

Metal parts are cleaned and tumbled in a water and detergent bath. Stainless steel fasteners then go through a passivation process, which uses a nitric acid solution to remove surface iron and protect the parts from corrosion. Parts made from other metals go to the electropolishing process, which uses a mild phosphoric and sulfuric acid solution to microscopically smooth and cleanse the fasteners. According to Mr. Behrens, parts that require electroplating are sent off site.

All baths from the metal finishing processes are taken directly to an on-site wastewater treatment plant (WWTP). Wastewater is adjusted for pH, flocculated, and settled. Treated wastewater is discharged directly to the sanitary sewer, which discharges to the City of Decorah publicly owned treatment works (POTW) under an industrial discharge permit, and is therefore exempt from the definition of solid waste per 40 CFR 261.4(a)(1)(ii). The wastewater treatment sludge is pressed in a filter press, and then falls directly into a container under the press. The dewatered filter cake is considered hazardous based on process and product knowledge.

Maintenance at the facility generates a variety of wastes. The facility generates used lamps and batteries, which are considered hazardous and are managed as universal waste. Maintenance activities also generate used oil, used oil debris, oily rags, and scrap metal, which are consolidated with the waste generated during metal fabrication. The facility has 18 parts washers that use high-flash virgin petroleum distillate solvent. The facility considers the used parts washing solvent nonhazardous based on product knowledge. Maintenance activities also generate waste aerosol cans, which the facility considers hazardous based on product and process

knowledge. Maintenance also generates waste paint-related material (WPRM), which the facility considers hazardous based on product and process knowledge. The facility also generates general trash.

In August 2017, an EPA contractor conducted a CEI at Infastech. During the 2017 CEI, the inspector made the following preliminary findings:

1. Failure to label used oil storage container with the words "used oil."
2. Failure to label universal waste battery containers with the words universal waste batteries," or "waste batteries," or "used batteries."
3. Failure to describe the emergency equipment capabilities in the contingency plan.
4. Failure to prepare a written description of the type and amount of introductory and continuing education.
5. Failure to include a description of arrangements with local emergency agencies in the contingency plan.
6. Failure to submit the contingency plan to local emergency agencies.
7. Failure to make an adequate hazardous waste determination on metallic sludge.

None of these findings were repeated during this inspection.

2. RCRA Status

The RCRA Info Data Verification Handler Report provided by EPA (Attachment 1) indicates that Infastech is a large quantity generator (LQG) generating more than 1,000 kilograms (kg) of hazardous waste per month. Based on my review of manifests, the 2021 Biennial Report (Attachment 9), and information provided by Mr. Behrens and Mr. Monroe, I concluded that Infastech is operating as a LQG of hazardous waste. Infastech currently generates approximately 3,900 kg per month of filter cake (D007, F006) alone. The facility is also a used oil generator and a small quantity handler of universal waste (accumulating less than 5,000 kg of universal waste at any time). I confirmed each of these activities during the CEI.

3. Waste Streams

This section of the CEI report describes 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 my interviews with Mr. Behrens and Mr. Monroe, the visual inspection, and my review of available documentation.

The visual inspection included the WWTP, maintenance areas, the hazardous waste central accumulation area (HWCAA), and manufacturing areas. Mr. Behrens and Mr. Monroe accompanied me throughout the visual inspection.

Scrap metal is generated during disposal of trim pieces, defective parts, and facility maintenance. The facility does not consider the scrap metal a solid waste per the exclusion in 40 CFR 261.4(a)(13). I did not determine the volume of scrap metal generated. It is accumulated in rollaway containers in metal fabricating areas, then consolidated in large rollaway containers outside a loading dock, segregated by metal type (Attachment 8, Photograph 1). Scrap metal is collected by Clayton County Recycling of Monona, Iowa, to be recycled. I did not identify any deficiencies related to scrap metal.

Metallic sludge is oily sludge generated from metal fabrication. Any free liquids are overpacked with absorbent material. The facility considers this waste nonhazardous based on product and process knowledge and on testing. I reviewed the September 2017 analytical report provided by the facility. The material was tested for metals, volatile organic compounds (VOCs), and semivolatile organic compounds (SVOCs). No regulatory levels were exceeded. According to Mr. Behrens, the facility generates approximately 220 gallons of metallic sludge every 5 or 6 weeks. This volume is equivalent to approximately 2,500 pounds. Metallic sludge is transported to CRI Environmental Solutions (CRI) in Woodville, Wisconsin, for recycling. It was most recently collected on May 25, 2022 (Attachment 10, Page 6).

During the inspection, I observed numerous containers of nonhazardous metallic sludge in the area around the WWTP and in metal fabricating areas (Attachment 8, Photographs 4, 9, 10, 11, and 28). The containers I observed were all in good condition and labeled as “used oil/sludge” or “used oil absorbents.” I did not identify any deficiencies related to metallic sludge.

Used oil is generated during maintenance of the facility’s equipment and during the cutting and quenching process. This facility manages this material according to 40 CFR Part 279. According to Mr. Behrens, the facility generates approximately 2,000 gallons of used oil per month. It is collected by Safety-Kleen Systems (SK) and transported to the SK facility in Davenport, Iowa, for recycling. It was last collected on June 6, 2022 (Attachment 10, Page 7).

During the inspection, I observed the primary used oil storage tank, which is adjacent to the WWTP, and a secondary used oil storage tank that is part of the WWTP and feeds the primary tank. Both tanks were in good condition and labeled as “used oil” (Attachment 8, Photographs 12 and 13). I also observed a used oil storage container under the used oil filter crusher (Attachment 8, Photograph 7). The container was in good condition and labeled as “used oil.” According to Mr. Behrens, this used oil is consolidated in the primary used oil storage tank.

I did not identify any deficiencies related to used oil.

Used oil debris is generated during maintenance of facility equipment and general facility maintenance. It includes crushed oil filters, used oily absorbent, and other oily debris. The facility considers this material nonhazardous based on product and process knowledge. According to Mr. Behrens, the facility generates approximately 10 cubic yards of used oil debris every 5 or 6 weeks. Used oil debris is transported to CRI Environmental Solutions (CRI) in Woodville, Wisconsin, for recycling. It was most recently collected on May 25, 2022 (Attachment 10, Page 6).

Used oil filters are taken to a filter crusher near the used oil storage tank (Attachment 8, Photograph 7). Filters are crushed, and then accumulated in a 55-gallon used oil storage container (Attachment 8, Photograph 8). This container was observed in good condition. Used oil drained from the crushed filters is pumped into a 5-gallon container under the crusher, as described above. I also observed a 10-cubic-yard rolloff container of miscellaneous used oil debris, including oily absorbent pads, empty oil containers, and paper filters (Attachment 8, Photographs 5 and 6). According to the label on the container, this rolloff container may also receive uncrushed used oil filters. Mr. Behrens said that this “used oil filters” label had been added as a precaution, but that the facility’s procedure was to crush all oil filters.

I did not identify any deficiencies related to used oil debris.

Oily rags are generated during maintenance of facility equipment and general facility maintenance. The facility does not consider these waste because they are laundered and reused. The facility considers this material nonhazardous based on product and process knowledge. According to Mr. Behrens and Mr. Monroe, the rags are not used to apply or wipe up solvent. I did not determine the generation rate for oily rags. According to Mr. Behrens, they are collected twice a week by Aramark of Lacrosse, Wisconsin, for laundering. I observed red safety cans holding oily rags around the facility. I did not identify any deficiencies related to oily rags.

Wastewater is generated during the cleaning, polishing, and passivating process. It is treated in the WWTP and discharged directly to the sanitary sewer, which discharges to the City of Decorah POTW under a discharge permit (Attachment 11). The facility considers this wastewater excluded from the definition of solid waste per 40 CFR 261.4(a)(1)(ii). Under the terms of the facility’s permit, the facility’s industrial discharge is monitored for pH, metals, oil and grease, and toxic organics. The discharge rate for wastewater is capped at 35,000 gallons per day and averages 25,000 gallons per day. I did not identify any deficiencies related to wastewater.

Filter cake is WWTP sludge generated by the facility’s treatment of wastewater. The facility considers this waste hazardous (D007, F006) based on product and process knowledge. Based on review of the Biennial Report (Attachment 9) and manifests, the facility generates approximately 3,900 kg of filter cake per month. It is transported to the Evoqua Water Technologies (Evoqua) in Roseville, Minnesota, for bulking. It was last collected on May 5, 2022 (Attachment 10, Pages 2 through 4).

During my inspection, I observed a 1-cubic-yard container of WWTP sludge attached to the base of the filter press in the WWTP (Attachment 8, Photograph 14). The container was open, but attached on all sides with plastic sheeting and actively receiving waste. The container was in good condition, labeled as “hazardous waste,” and dated June 13, 2022 (Attachment 8, Photograph 16). To identify the nature of the hazard, the container was labeled as Class 9 Miscellaneous hazardous material, as containing chromium, and as wastewater treatment sludge.

In the less-than-90-day HWCAA adjacent to the WWTP, I also observed four full 1-cubic-yard containers of filter cake (Attachment 8, Photographs 14, 15, 17, and 18). All were in good

condition and closed. They were labeled similarly to the active container under the filter press. The oldest container was dated May 19, 2022 (Attachment 8, Photograph 17).

I did not identify any deficiencies related to filter cake.

Used parts washer solvent is generated in the facility's 18 parts washer units, two of which are agitation cleaners (Attachment 8, Photographs 2 and 25). The solvent used in this cleaner is SK's virgin Premium Solvent, which consists of petroleum distillates and has a flash point of 148°F. The facility considers the used parts washer solvent nonhazardous based on product and process knowledge. Based on shipping records, the facility generates between 200 and 350 gallons of used solvent every 8 weeks. According to Mr. Behrens, the parts washers are on a variety of service schedules. Used solvent is collected by SK and transported to SK's Davenport facility for recycling. It was last collected on May 11, 2022 (Attachment 10, Page 5). During an inspection, I also observed a container of used parts washer solvent in a maintenance area near the WWTP (Attachment 8, Photograph 3). I did not identify any deficiencies related to used parts washer solvent.

WPRM is generated during episodic painting events conducted by the facility's maintenance staff. According to Mr. Behrens, the facility does not paint as part of manufacturing activities. The facility uses a variety of solvents and paint formulations. The facility considers this waste stream hazardous (D001, D035, F003, F005) based on product and process knowledge. In 2021, the facility generated approximately 146 kg of WPRM in total (Attachment 9, Page 4). The waste is transported to WRR Environmental Services (WRR) in Eau Claire, Wisconsin, for bulking. It was last collected on January 14, 2021. I did not observe any WPRM during the inspection.

Used aerosol cans are generated when aerosol cans of paints, lubricants, and cleaners can no longer be used. The facility considers this waste stream hazardous (D001) based on product process knowledge. Based on review of the 2021 Biennial Report (Attachment 9, Page 5) and manifests, the facility generates approximately 50 kg of used aerosol cans per year. These are transported to WRR in Eau Claire, Wisconsin, for bulking. These were last collected on April 14, 2022 (Attachment 10, Page 1).

During the visual inspection, I observed a 55-gallon SAA container of used aerosols in a maintenance area in the Heat Treat and Finishing building (Attachment 8, Photographs 26 and 27). The container held less than 10 gallons of used aerosol cans. The container was in good condition, closed, labeled as "hazardous waste," and marked to indicate the nature of the hazard (flammable).

I did not identify any deficiencies related to used aerosol cans. I provided compliance assistance regarding management of used aerosol cans as universal waste.

Universal waste lamps are generated during facility maintenance. The facility still uses some tube fluorescent lamps but has largely retrofitted the buildings' fixtures to light emitting diode (LED) lamps. The facility considers the used LED lamps to be nonhazardous based on the product data sheets. The facility manages used fluorescent lamps as universal waste according to

40 CFR 273. I did not determine the generation rate for universal waste lamps. They are collected for recycling by S-K of Davenport, Iowa. Mr. Monroe said they were last collected in November 2021.

During the inspection, I observed a container of universal waste lamps in the vicinity of the WWTP HWCAA (Attachment 8, Photographs 23 and 24). The container held approximately 10 lamps. It was closed, in good condition, and labeled as waste lamps. The container was marked with an accumulation start date of November 22, 2021.

I did not identify any deficiencies related to universal waste lamps.

Universal waste batteries are generated during facility maintenance, including nickel-cadmium, lead-acid, silver-oxide, lithium, and alkaline batteries. The facility manages used batteries as universal waste according to 40 CFR 273. I did not determine the generation rate for universal waste batteries. They are collected for recycling by Veolia of East Chicago, Indiana. Mr. Monroe said they were last collected in June 2021.

During the inspection, I observed six 5-gallon containers of universal waste batteries in the area of the WWTP (Attachment 8, Photographs 19 and 20). They were on a pallet and shrink-wrapped for shipment. According to Mr. Monroe, the facility had been waiting for a week or two for the transporter's truck to arrive to collect the batteries. The containers were in good condition and labeled as universal waste batteries. All were marked with accumulation start dates, and two of the containers had started accumulating waste longer than 1 year before the inspection. They were dated June 10, 2021, and June 11, 2021. As a result, I concluded that the facility had failed to send universal waste for recycling within 1 year of initial accumulation, as required by 40 CFR 273.15(a) (**NOFF No. 1**). I provided compliance assistance regarding accumulation of universal waste.

General trash is generated from facility maintenance and cleaning, and includes office trash. The facility considers the general facility trash nonhazardous based on product and process knowledge. General trash includes, but is not limited to, paper, food waste, and packaging. I did not determine the generation rate for general trash. The trash is accumulated in rollaway containers around the facility and transported for disposal to the Winneshiek County Landfill in Decorah, Iowa. I did not identify any deficiencies related to general trash.

4. Required Response Equipment and Hazard Management

Per 40 CFR 262.15(a)(8) and 262.17(a)(6), a LQG must operate to minimize the possibility of a fire, explosion, or spill, and must maintain emergency response equipment. During the visual inspection of the HWCAA and SAA, I observed telephones for summoning emergency assistance, emergency response materials and spill kits, and fire extinguishers. Examples of response equipment are shown in Attachment 8, Photographs 21 and 22. Smoking is prohibited in all operational areas of the facility, and I observed "No Smoking" and other fire prevention warning signs around the facility, including at the HWCAA. I did not observe any deficiencies related to emergency response equipment during the inspection.

5. HWCAA

I was accompanied by Mr. Behrens and Mr. Monroe to the less-than-90-day HWCAA, which is adjacent to the WWTP. The facility inspects the HWCAA weekly and maintains logs of its inspections (Attachment 12). I reviewed 3 years of these logs and did not observe any gaps of more than 1 week.

At the time of the inspection, the HWCAA held four full 1-cubic-yard containers of filter cake waste and one 1-cubic-yard container that was being actively filled. The oldest container I observed in this HWCAA was dated May 19, 2022. I did not observe any deficiencies related to the HWCAA.

6. Manifests and Biennial Report

During the CEI, I reviewed the approximately 25 of the approximately 45 manifests and LDR notifications generated in the previous 3 years, and I verified that the facility had copies of manifests for 3 years. Copies of manifests are included in Attachment 10. The Hazardous Waste Biennial Report for 2021 was submitted in February 2022, and I obtained a copy during the inspection (Attachment 9).

I did not observe any deficiencies related to manifests or reporting.

7. Preparedness and Prevention and Contingency Plan

LQG facilities are required by 40 CFR 262.17(a)(6) to meet the emergency preparedness, prevention, and procedures requirements outlined in 40 CFR 262 Subpart M, including preparation of a RCRA contingency plan and documented arrangements with response agencies. During the CEI, I reviewed the facility's RCRA contingency plan (Attachment 13). The plan had most recently been updated on May 16, 2022. During my review, I concluded that the contingency plan had all elements required by 40 CFR 262.261.

During my review of the contingency plan, I did not observe a quick reference guide (QRG). I asked Mr. Behrens about distribution of the plan and the preparation of the QRG. He said that the complete contingency plan was sent to response agencies, including the fire department, police department, and hospital. He said that the facility had not prepared a QRG. I concluded that the facility had failed to prepare and distribute a QRG, as required by 40 CFR 262.17(a)(6) referencing 262.262(b) (**NOPF No. 2**). I provided compliance assistance regarding the contents of the QRG.

Based on the RCRA contingency plan, Mr. Behrens is the primary emergency coordinator (EC), with Mr. Monroe as his alternate. According to Mr. Behrens, these ECs and their contact info are up to date.

I did not observe any other deficiencies regarding the facility's RCRA contingency plan or preparedness and prevention program.

8. Personnel Training Requirements

Personnel training is required by LQG regulations specified in 40 CFR 262.17(a)(7) to ensure that employees are thoroughly familiar with proper waste handling procedures relevant to their responsibilities. Infastech provides training covering hazardous waste awareness, management, and labeling to relevant administration, engineering, and maintenance staff. Infastech also provides training to all employees on emergency response procedures and responsibilities. These trainings are provided as part of an employee's initial training and annually thereafter. I reviewed job descriptions provided by Mr. Behrens that included a description of duties, education, skills, and qualifications, and those descriptions included the ECs. I also reviewed a training matrix that showed skills and training that must be acquired by WWTP operators at the facility (Attachment 14).

During the inspection, I reviewed training documentation for RCRA annual refresher training back to 2014 (Attachment 15). In particular, I evaluated training records for Mr. Behrens, Mr. Monroe, and Mr. Kevin Langreck, who also conducts weekly inspections and signs manifests when Mr. Monroe and Mr. Behrens are not available. Mr. Monroe was trained annually every year but 2020. Mr. Langreck was trained in 2014, 2015, and 2016, but not 2017 or 2018 when he was performing other duties at the facility. Mr. Langreck also did not receive training in 2020. Mr. Behrens did not have any records of receiving training but said that he had received training at another Stanley facility before arriving in Decorah. According to Mr. Behrens, the COVID pandemic disrupted training scheduling in 2020, and the RCRA training was not administered to any employees. I concluded that the facility had failed to provide annual RCRA refresher training, as required by 40 CFR 262.17(a)(7)(iii) (**NOPI No. 3**). I provided compliance assistance regarding RCRA annual training.

I did not observe any other deficiencies related to personnel training.

9. Air Emissions: 40 CFR Part 265 Subparts AA, BB, CC

EPA regulations in 40 CFR Part 265, Subparts AA, BB, and CC apply to LQGs. If a LQG manages hazardous waste with an organic concentration greater than 10 parts per million by weight (ppmw), the standards found in Subpart AA apply to hazardous waste air emissions from certain process vents. A process vent used in distillation, fractionation, solvent extraction, thin-film evaporation, air stripping, or steam stripping is regulated by Subpart AA. Infastech is not subject to the Subpart AA regulations.

If a LQG has equipment that contains or contacts hazardous waste composed of 10 percent or greater organics by weight, the facility is subject to Subpart BB standards for inspection and monitoring of the equipment. Infastech is not subject to the Subpart BB regulations because it does not have equipment that contains or comes in contact with hazardous waste.

The standards found in Subpart CC apply to LQGs that manage hazardous waste in containers with volatile organic compounds (VOC) concentration that exceeds 500 ppmw. The Subpart CC standards are applicable at Infastech because the facility accumulates hazardous waste that contains VOCs in containers larger than 26 gallons in capacity. During the CEI, I determined that the facility complies with the Subpart CC requirements for 55-gallon containers by using

Container Level 1 controls (containers smaller than 122 gallons that are U.S. Department of Transportation [DOT]-approved). I did not observe any deficiencies related to the Subpart CC air emissions requirements during the inspection.

10. Summary of Preliminary Findings

In summary, as part of the CEI, I found that the facility had:

1. Failed to send universal waste for recycling within 1 year of initial accumulation, as required by 40 CFR 273.15(a) (**NOPF No. 1**).
2. Failed to prepare and distribute a QRG, as required by 40 CFR 262.17(a)(6) referencing 262.262(b) (**NOPF No. 2**).
3. Failed to provide annual RCRA refresher training, as required by 40 CFR 262.17(a)(7)(iii) (**NOPF No. 3**).

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.



Digitally signed by Heather Wood
Date: 2022.08.08 13:40:23 -05'00'

Date: _____

Heather K. Wood
Inspector, Tetra Tech Inc.

AMBER WHISNANT

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Date: 2022.08.10 14:00:51 -05'00'

Date: _____

Amber Whisnant
Section Chief, ECAD/CB/RCRA

Attachments:

1. Hazardous Waste Site Info Verification Report (2 Pages)
2. Data Gathering Worksheets and Checklists (29 Pages)
3. Receipt for Documents and Samples (1 Page)
4. Confidentiality Notice (1 Page)
5. Notice of Preliminary Findings (1 Page)
6. Map of Facility (1 Page)
7. Aerial Image of the Facility (1 Page)
8. Photographic Documentation (Photolog and 28 Images) (17 Pages)
9. 2021 Biennial Report (5 Pages)
10. Manifests and Shipping Receipts (7 Pages)
11. Wastewater Permit (3 Pages)
12. Inspection Log (2 Pages)
13. Contingency Plan (68 Pages)
14. Training Matrix (2 Pages)
15. Training Log (1 Page)

NOTICE OF PRELIMINARY FINDINGS

FACILITY NAME: INFASTECH DECORAH LLC
ADDRESS: 1302 KERR DR
DECORAH IA 52101
EPA ID NUMBER: 1A053737532 DATE: 6/15/22

NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and making the determinations as to what violations may have occurred at your facility.

1. ACCUMULATION OF UNIVERSAL WASTE FOR LONGER THAN
1 YEAR (40 CFR 273.15(a))
2. FAILURE TO PREPARE + DISTRIBUTE A QUICK REFERENCE
GUIDE FOR THE CONTINGENCY PLAN (40 CFR 262.17(a)(6) → 262.262(b))
3. FAILURE TO PROVIDE ANNUAL RCRA REFRESHER TRAINING
(40 CFR 262.17(a)(7)(iii))
4. _____
5. _____
6. _____
7. _____

If you have any questions regarding these findings please contact TREVOR URBAN, EPA REGION 7

The undersigned person hereby acknowledges receipt of a copy of this document and has read the same.

PRINTED NAME: Jeff Brower TITLE: Director of Ops

SIGNATURE: Jeff Brower

This document was prepared by HEATHER K. WOOD