

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

Ashley Industrial Molding Inc.

951 2nd Ave SE

Oelwein, IA 50662

(319) 283 – 6627 ext.411

EPA ID Number: IAD014117550

On

January 25, 2022

By

Eastern Research Group, Inc.

For

U.S ENVIRONMENTAL PROTECTION AGENCY

Region 7

Enforcement and Compliance Assurance Division

1.0 INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division/Chemical Branch/RCRA Section (ECAD/CB/RCRA) of the U.S. Environmental Protection Agency (EPA) Region 7, Eastern Research Group, Inc. (ERG) conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Ashley Industrial Molding Inc. (Ashley) in Oelwein, Iowa on January 25, 2022. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. Throughout the CEI, data and information were collected to determine compliance with the applicable regulatory and statutory requirements. The inspection report and attachments present the results of the CEI.

2.0 PARTICIPANTS

Ashley Industrial Molding Inc.

Jeremy James, Plant Manager

Catherine Mowery, Environmental Health and Safety Director

EPA Representative, ERG:

Janosh Wolters, Energy Engineer

3.0 INSPECTION PRECEDURES

After arriving unannounced at Ashley at approximately 08:35, I performed a drive-by visual inspection of the facility and took a photograph before beginning the inspection and did not note any areas of concern. I then entered the main entrance and I introduced myself to the front desk attendant, Jane Domeyer. I explained my reason for being on site is to conduct a RCRA CEI and asked to meet with the facility personnel who manages hazardous waste on site. Mr. James then greeted me at the facility entrance and led me to his office to begin the opening conference at approximately 08:45. I initiated the opening conference with Mr. James. Mr. James informed me that Ms. Mowery, the facility's corporate Environmental Health and Safety Director would participate in the inspection via telephone. I then continued with the opening conference with Mr. James and Ms. Mowery present as Ashley representatives. I presented Mr. James with my inspector credentials and business card, as well as the business card of the EPA Task Order Contracting Officer Representative, Mr. Trevor Urban. I then presented a copy of RCRA Section 3007(a), which contains EPA's inspection authority. I explained my need to collect accurate information and presented them with a copy of Title 18 U.S. Code, Sections 1001 and 1002. I then presented Mr. James with a copy of the *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections* and reviewed Ashley's confidentiality rights. I informed Mr. James that I would provide a *Confidentiality Notice* at the end of this inspection.

The inspection consisted of a discussion of facility operations, waste generation and waste management, a review of waste management records, and a visual inspection of the waste generation and management areas. Mr. James provided a facility layout (see Attachment 1) and explained facility operations and locations of hazardous waste generation and management.

During the visual inspection of the facility, Mr. James guided me throughout the facility in order to conduct thorough evaluations of the facility's satellite accumulation areas (SAAs) and central accumulation area (CAA). At the time of the inspection, the facility was operating eight SAAs and one CAA. The facility also handles universal waste in one designated area on site as shown on the facility layout. The universal waste storage area was visually inspected. Ashley uses two parts washers on site. One parts washer is a nonhazardous parts washer in the maintenance area. The other parts washer is located in the paint kitchen and uses acetone as a cleaning solvent. I conducted an in-depth visual inspection of the SAAs, the CAA, the universal waste storage area, used oil storage area, and all manufacturing areas.

Eight photographs were collected as inspection documentation and are shown in Attachments 2 and 3. Information collected during the inspection is documented on the *EPA Inspection Checklist* (see Attachment 4). I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.01D), unless noted differently. At the conclusion of the inspection, I provided Mr. James with a *Confidentiality Notice*, *Receipt for Documents and Samples*, and a *Notice of Preliminary Findings (NOPF)* which he signed as acknowledgement of receipt (see Attachments 5, 6, and 7 respectively). No confidentiality claims were made by Ashley.

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

RCRA Section 3007(a)
Title 18 U.S. Code, Sections 1001 and 1002
Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections
Confidentiality Notice (Facility copy)
Receipt of Documents and Samples (Facility copy)
NOPF (Facility copy)
Instructions for Responding to a NOPF
Security Awareness
Commercial Motor Vehicle Transportation
Security Planning
EPA E-Manifest Fact Sheet U.S.
EPA Small Business Resources
U.S. EPA Publication, Managing Your Hazardous Waste
U.S. EPA Publication, Managing Used Oil-Advice for Small Businesses
PowerPoint Presentation, 2013 Solvent Wipes Final Rule
Pollution Engineering Article, 10 Common Questions for Waste Generators
Iowa Department of Natural Resources (IDNR) Waste Exchange Folder and P2 Brochures
IDNR Management of Fluorescent Lamps for Businesses Information Sheets
IDNR Aerosol Can Disposal for Businesses Information Sheet
University of Northern Iowa Waste Reduction Center Information Card
Solvent-Contaminated Wipes Final Rule Summary Chart

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

Ashely began operating in 2009 and currently employs approximately 105 people. The facility operates on a four day, 10-hour shift schedule. Occasionally, certain employees are offered to work overtime on a Friday or Saturday if manufacturing demands must be met. The facility has a footprint of approximately 135,000 square feet. Ashley's operations consist of manufacturing fiberglass molding and painting agricultural equipment. The primary raw materials used are fiberglass, paint, and solvents. The major manufacturing or processing operations that generate waste streams include manufacturing of fiberglass molding and painting operations. The following waste streams are produced: waste paint related material, hazardous rags, aerosol can residuals, sheet molding compound and plastic dust, paint booth filters, parts washer solutions, process wastewater, scrap metal, used oil, used oil filters, universal waste lamps, universal waste batteries, and general trash.

4.2 RCRA Status

According to the *Hazardous Waste Site Info Verification Report for Inspector* (see Attachment 8), Ashley notified as a federal Large Quantity Generator (LQG) of D001, D002, D006, D009 and F003 hazardous wastes. I asked Mr. James to review the *Hazardous Waste Site Info*

Verification Report for Inspector, which I provided prior to records review and visual inspection of the waste generation areas. Mr. James requested I update the facility contact job title. The remaining information on the form was accurate to the best of his knowledge. After reviewing the records and walking through the facility, I determined that the facility is operating as a federal LQG of D001 and F003 hazardous wastes, a generator of used oil, and a small quantity handler (SQH) of universal waste. Ashley generates more than 1,000 kilograms of hazardous waste monthly based on a review of facility records, a visual inspection of process and waste management areas, and interviewing personnel.

Ashley was previously inspected by an EPA contractor on May 5 and 6, 2016. The inspection led to a NOPF. The findings included a failure to label SAA containers with the words “hazardous waste”, failure to keep SAA containers closed, failure to label a CAA container with the words “hazardous waste”, failure to label a CAA container with an accumulation start date, failure to conduct weekly inspections of the CAA, and failure to accumulate universal waste lamps in closed containers. Additional NOPF findings included failure to label universal waste lamps with the words “universal waste lamps”, failure to label universal waste batteries containers with the words “universal waste batteries”, failure to date or otherwise track universal waste accumulation times, failure to inform employees of universal waste management and handling requirements, and failure to provide annual hazardous waste training. At the time of my inspection, I had the following repeat finding:

NOPF 3 – Failure to refresh hazardous waste training annually. [40 CFR 262.17(a)(7)(iii)].

Ashley responded by correcting issues from the previous inspection and no enforcement actions were taken.

4.3 Facility Waste Streams and Management

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

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#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
1	Waste Paint Related Material (Waste Profile included in Attachment 9)	Painting operations	D001, F003 (based on process knowledge and knowledge of the product)	20 55-gallon containers per month	5-gallon containers and 55-gallon containers in SAAs	Hydrite Chemical (IAT20010593) to Tradebe Treatment & Recycling in East Chicago, IN (IND000646943) for fuel blending
2	Hazardous Rags (Waste Profile included in Attachment 10)	Wiping off excess solvent when cleaning paint guns	D001 (based on process knowledge and knowledge of the product)	Two 55-gallon containers per month	55-gallon containers	Hydrite Chemical (IAT20010593) to Tradebe Treatment & Recycling in East Chicago, IN (IND000646943) for fuel blending
	See section 4.7 of this report for more clarification on the management of this waste stream.					
3	Aerosol Can Residuals	Maintenance	D001 (based on process knowledge and knowledge of the product)	Less than one gallon per year, added to waste paint related material waste stream	55-gallon container	Hydrite Chemical (IAT20010593) to Tradebe Treatment & Recycling in East Chicago, IN (IND000646943) for fuel blending
4	Sheet Molding Compound and Plastic Dust (Special Waste Authorization (SWA) included in Attachment 11)	Excess material from sheet molding process and sanding operations	Nonhazardous (based on process knowledge and knowledge of the product)	Not tracked but SWA authorization states disposal of 20,000 pounds per quarter is allowed	30-yard container	Black Hawk County Solid Waste Landfill in Waterloo, IA for landfill

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
5	Paint Booth Filters (SWA included in Attachment 12)	Painting operations	Nonhazardous (based on process knowledge and product)	Not tracked but SWA authorization states disposal of 3,000 pounds per quarter is allowed	30-yard container	Black Hawk County Solid Waste Landfill in Waterloo, IA for landfill
6	Hazardous Parts Washer	Cleaning outside of paint guns	D001, F003 (based on process knowledge and product)	20 gallons once every three months	In parts washer	Hydrite Chemical (IAT20010593) to Tradebe Treatment & Recycling in East Chicago, IN (IND000646943) for fuel blending
7	Parts Washer (Waste Profile included in Attachment 13)	Cleaning oil residue off various small tools used by maintenance staff	Nonhazardous (based on process knowledge and product)	15-gallon parts washer serviced twice per year	In parts washer	Safety Kleen in Des Moines, IA (IAD981718000) for recycling
8	Process Wastewater (Waste Profile included in Attachment 14)	Cutting SMC material after molding process and washing final products prior to painting operations	Nonhazardous (based on process knowledge and product)	275 gallons discharged to sanitary sewer every two days	Discharged via sanitary sewer	Discharged via sanitary sewer to City of Oelwein POTW in Oelwein, IA for treatment

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
9	Scrap Metal	Facility operations	Nonhazardous (based on process knowledge and knowledge of the product)	15-yard container picked up every two months	15-yard container	Tournier Recycling Inc. in Independence, IA for recycling
10	Used Oil	Facility maintenance	Exempted (managed as used oil under 40 CFR 279)	2,000 gallons every two months	2,000-gallon tank	Safety Kleen in Des Moines, IA (IAD981718000) for recycling
11	Used Oil Filters	Air compressors and forklift maintenance	Exempted (managed as used oil under 40 CFR 279)	Forklifts and air compressors serviced quarterly	Taken off-site immediately after servicing	John Henry Foster in Hiawatha, IA to John Henry Foster in Eagan, MN (MND139251094) and Hupp Toyota in Cedar Rapids, IA (IAD984615948) for recycling
12	Universal Waste Lamps (Invoice included in Attachment 17)	Facility maintenance	Exempted (managed as universal waste)	Six 4-foot containers per year	4-foot containers	Safety Kleen in Des Moines, IA (IAD981718000) for recycling
13	Universal Waste Batteries (Invoice included in Attachment 18)	Facility maintenance	Exempted (managed as universal waste)	One 2.5-gallon container per year	2.5-gallon container	Safety Kleen in Des Moines, IA (IAD981718000) for recycling

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
14	General Trash (Invoice included in Attachment 19)	Facility operations	Nonhazardous (based on process knowledge and knowledge of the product)	42-yard container picked up weekly	42-yard container	Waste Management in Independence, IA to Black Hawk County Solid Waste Landfill in Waterloo, IA for landfill

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

Ashley has one Less-Than-90-Day CAA on site, which is located next to the paint kitchen area and is marked as “CAA” on the facility layout (see Attachment 1). I visually inspected the CAA and observed five 55-gallon containers of hazardous waste. Four 55-gallon containers were filled with waste paint related material and one 55-gallon container was filled with hazardous waste rags (see Attachment 3, Photo 8). See section 4.7 of this report for more information on the facility’s management of hazardous waste rags.

The remaining four 55-gallon containers were filled with waste paint related material. The containers were placed on secondary containment pallets. The earliest accumulation start date on a container in the CAA was January 17, 2022. January 17, 2022 is within 90 days from the time of the inspection. The Less-Than-90-Day CAA containers were in good condition, labeled with the indication of the nature of the hazard, labeled with an accumulation start date, and labeled with the words “Hazardous Waste”.

I observed adequate aisle space to allow for container inspections and access in the event of a spill. All containers were placed on pallets that provided secondary containment in the event of a leaking container. I observed a fire extinguisher, spill control equipment, and related safety equipment within the CAA. Operators handling hazardous waste are trained to use their two-way radio system in case of emergencies. A sign was posted on the wall near the CAA which listed the phone numbers of emergency coordinators and emergency response agencies. I asked Mr. James if the facility inspected the CAA. Mr. James stated the facility inspected the CAA at least weekly and had weekly inspection logs. During records review, Mr. James provided inspection logs for the CAA. I reviewed the logs and determined the facility was adequately performing weekly inspections of the CAA. Examples of the CAA logs are provided in Attachment 20. I did not note any issues or findings at the CAA during the inspection.

4.5 Satellite Accumulation Areas

I observed eight SAAs during the visual inspection. The table below shows the SAA name or location, waste type, volume of waste observed, and container type.

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SAA #	SAA Name or Location	Waste Type	Volume of Waste	Container Type
1	Molding	Hazardous Rags	10 gallons	55-gallon container
2	Paint Kitchen	Aerosol Can Residuals/Hazardous Rags	Less than two inches of aerosol can residuals in a 55-gallon container, 4-gallons of hazardous rags in a 5-gallon container	55-gallon container and 5-gallon container
3	Topcoat Paint Booth	Waste Paint Related Material	2.5 gallons	5-gallon container
4	Topcoat Paint Booth	Waste Paint Related Material	2.5 gallons	5-gallon container
5	Topcoat Paint Booth	Waste Paint Related Material	2.5 gallons	5-gallon container
6	Topcoat Paint Booth	Waste Paint Related Material	2.5 gallons	5-gallon container
7	Primer Paint Booth	Waste Paint Related Material	2.5 gallons	5-gallon container
8	Primer Paint Booth	Waste Paint Related Material	2.5 gallons	5-gallon container

The hazardous waste accumulation containers observed in the eight SAAs were in good condition, closed, labeled with the indication of the nature of the hazard, and labeled with the words “Hazardous Waste”. I reviewed the management of the SAAs and management of universal waste aerosol cans, and no issues or findings were noted.

4.6 Painting Booths

During the visual inspection, I observed two paint booths. The topcoat paint booth held four separate SAAs, each containing one 5-gallon container. The primer paint booth held two SAAs, each container one 5-gallon container. Mr. James explained the facility flushes manual paint gun lines in the 5-gallon containers after each painting operation. Mr. James stated the facility uses acetone to flush paint gun lines. The 5-gallon containers are emptied into a 55-gallon container in the CAA at the end of each shift. There are multiple 5-gallon containers in each paint booth because paint booths are approximately 50 feet long. Mr. James explained to save time for painters, multiple 5-gallon containers are used to increase efficiency of painters. Prior to entering the painting booth areas through the paint kitchen, Mr. James stated the area does not allow for any electronics to enter these areas. Therefore, I was not able to take photographs to visually represent how large paint booths were on site. The waste is shipped off site under the waste paint related material waste profile provided in Attachment 9. This waste profile was created based on

process knowledge of how this waste stream is generated. The SDS for the acetone used to flush paint guns is included in Attachment 21. Any rags that are generated during the paint gun flush operation are placed in the 5-gallon container outside the topcoat primer in SAA #2.

I reviewed the management of both paint booths, and no additional issues or findings were noted.

4.7 Parts Washers

The facility operates two parts washers. One of the parts washers is located in the maintenance shop as shown on the facility layout (Attachment 1). The parts washer holds 15-gallons of parts washer solution and maintenance staff utilize this parts washer to clean small tools. The second parts washer holds 20-gallons of acetone and is located inside the paint kitchen. This parts washer is used to clean the outside of paint guns. Mr. James explained the spent parts washer solvent from the paint kitchen parts washer is added to the waste paint related material waste stream as needed. Mr. James stated that hazardous waste rags are generated from wiping off excess acetone from the outside of paint guns. The rags are placed in the 5-gallon container in SAA #2. I asked Mr. James why the facility manages the rags as a hazardous waste. The hazardous rags are managed as a D001 hazardous waste. During records review, I reviewed the hazardous rags waste profile (Attachment 10). The waste profile indicates the waste stream to largely contain oil-soaked towel and rags. I asked Mr. James why this waste stream would be managed as a hazardous waste. Mr. James stated that hazardous waste rags are also generated from wiping off excess acetone from the outside of paint guns. The rags are placed in the 5-gallon container in SAA #2. The waste profile indicates the rags should not contain free liquids. I asked Mr. James if the rags generated in SAA #2 contain free liquids. Mr. James stated the rags do not contain free liquids when entering the 5-gallon container in SAA #2. Mr. James stated the facility manages the waste stream as a D001 out of an abundance of caution. I explained to Mr. James if the facility's rags do not contain free liquids at the point of generation, based on the SDS provided for acetone, the waste would not carry the F003 waste code because it does not contain free liquids and therefore would also not carry the D001 waste code as long as the solid waste rags do not self-ignite. Mr. James stated he understood and would inquire if the facility wanted to change their management practices of this waste stream to a nonhazardous waste. Mr. James explained that he is aware of the solvent contaminated wipes exclusion but preferred to manage them as a hazardous waste. Mr. James explained the parts washer used in the maintenance area uses a nonhazardous solvent solution. Mr. James explained the parts washer is used to clean off small hand tools used for maintenance activities. This includes a variety of hand tools maintenance uses during operations. Mr. James stated these tools are used on machinery and do not come in contact with solvents or paint. Mr. James stated these tools often have contact with oil which is cleaned off in the parts washer. The SDS for this solution is provided in Attachment 13. Mr. James stated the maintenance parts washer is used on an as-needed basis and is serviced twice per year by Safety Kleen.

4.8 Aerosol Can Puncture Unit

The facility operates one aerosol can puncture unit in SAA #2 which is located in the paint kitchen as labeled on the facility layout (see Attachment 1). I asked how aerosol cans are generated on site. Mr. James stated aerosol cans are primarily used for small painting touch ups on final products and painting barrels. Mr. James stated the facility uses aerosol cans until RCRA empty and only punctures them after being determined to be RCRA empty. Mr. James explained if an aerosol can were to break, was no longer operational, the facility would puncture the aerosol can immediately at the aerosol puncture unit in SAA #2. I did not note any issues or concerns with the aerosol can puncture unit.

4.9 Universal Waste Storage Area

The facility manages universal wastes outside the office area as labeled on the facility layout (see Attachment 1). During the visual inspection, I observed one 4-foot universal waste lamps container (see Attachment 3, Photo 6). The 4-foot container was closed, in good condition, and labeled as "Universal Waste Lamps." The accumulation start date observed on the universal waste lamps container was "1/19/2022." Mr. James stated the facility also generates waste lamps that are accumulated in 8-foot containers but did not have any accumulating at the time of the inspection. In addition, I observed one 15-gallon container of waste ballasts and three 5-gallon containers of universal waste batteries. Although the 15-gallon container of waste ballasts are not considered universal wastes, the facility used the universal waste storage area to accumulate waste ballasts. The universal waste batteries containers had accumulation start dates between April and May of 2019 (See Attachment 3, Photos 2-5). One 5-gallon container of waste lithium and lithium-ion batteries was labeled with an accumulation start date of "5/22/19". A second 5-gallon container of waste nickel compound batteries was labeled with an accumulation start date of "5/22/19". The third 5-gallon container of waste alkaline batteries labeled with an accumulation start date of "4/15/2019". The 5-gallon containers were closed, in good condition, and labeled as "Waste Batteries". I asked Mr. James if he believed the date on the containers to be correct and if not, when the last time universal waste batteries were shipped off site. Mr. James stated it must have been overlooked and that he knew universal wastes could not be accumulated for longer than one year. Mr. James stated operators have been trained on this. During records review, Mr. James showed the training employees received which included ensuring universal wastes are shipped off site within one year and would ensure all employees receive the training again. Mr. James provided the most recent shipment of universal waste lamps and universal waste batteries which are provided in Attachment 17 and 18, respectively. Due to the facility accumulating three 5-gallon containers of universal waste batteries longer than one year I left the following finding:

NOPF 1 – Accumulating universal waste for longer than one year. [40 CFR 273.15(a)].

I reviewed the management of the universal waste storage area and no additional issues or findings were noted.

4.10 Used Oil

I visually observed the facility's used oil storage area located next to the molding area as labeled on the facility layout (see Attachment 1). I observed one 2,000-gallon tank of used oil (see Attachment 3, Photo 7). Mr. James stated the tank is emptied via vacuum truck by Safety-Kleen. The oil being accumulated in the used oil tank is coming from the mold presses and various facility equipment. When used oil is generated from these processes, it is hard piped into the 2,000-gallon tank. I observed hard piped lines labeled with the words "Used Oil". The lines leading into the 2,000-gallon tank are dedicated lines used for transferring used oil from mold presses into the 2,000-gallon tank. I observed lines from mold presses joining into a single inlet into the 2,000-gallon tank. In addition, the facility has forklifts and air compressors serviced once per quarter and used oil from these processes are hauled off site at the time of servicing. The corresponding invoices for the forklift maintenance and air compressor maintenance are provided in Attachment 15 and 16, respectively. The 2,000-gallon tank was closed, labeled "Used Oil", and in good condition. I did not note any issues or findings at the used oil storage area.

4.11 Other Regulatory Requirements

Preparedness, Prevention, and Emergency Requirements - Safety and emergency equipment were present and in satisfactory condition in areas throughout the facility, including the hazardous waste container CAA (as noted in Section 4.4 of this report). Appropriate arrangements and coordination were made with necessary State and local emergency agencies.

I reviewed the preparedness, prevention, and emergency requirements and no issues or findings were noted.

Contingency Planning Requirements - The contingency plan (see Attachment 22) was on file electronically and was reviewed while on site. The contingency plan had been revised on January 11, 2022 and included emergency evacuation routes, emergency response procedures, emergency coordinators and contact information, and a list of emergency response equipment. The facility had submitted the contingency plan to local emergency response agencies including the local police department, fire department, and hospital.

During records review, I asked Mr. James for the facility's quick reference guide. Mr. James stated he was not aware this was a requirement and stated the facility did not have a quick reference guide. Therefore, I left the following finding:

NOPF 2 – Failure to prepare a quick reference guide upon revising facility contingency plan after May 20, 2017. [40 CFR 262.17(a)(6)→262.262(b)].

I then provided a detailed explanation of the requirements and thoroughly explained to Mr. James why I was leaving this finding and recommended he review 40 CFR 262.262(b)(1) through (b)(8) to ensure the facility includes all necessary components in the quick reference guide.

I reviewed the entire RCRA contingency plan and no additional issues or findings were noted.

Personnel Training Requirements – Personnel are to be trained to perform hazardous waste duties, and new employees are to be trained within 6 months of start. The training, at a minimum, must be designed to ensure personnel at Ashley are able to manage hazardous waste relevant to the positions in which they are employed and respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including:

1. Procedures for using, inspecting, repairing, and replacing facility emergency equipment
2. Communications and alarm systems
3. Response to fires or explosions

Upon reviewing the hazardous waste training employees of Ashley received, I determined the training to be sufficient. I asked Mr. James which employees manage hazardous waste on site. Mr. James stated himself and certain operators manage the facility's hazardous waste on site. Mr. James explained when an employee is hired, the facility determines if the employee will be managing or handling hazardous waste and tracks which employees need to receive training. Mr. James stated he attends a yearly hazardous waste refresher training. Mr. James then instructs a class to employees needing annual hazardous waste refresher training. During records review, Mr. James provided a list of employees and their respective job titles indicating the requirement for these individuals to attend initial and continual hazardous waste training. Mr. James explained that all individuals would be trained at least annually after their initial training which occurs within the first 6 months of their employment. Mr. James provided yearly records of completed trainings for these employees. Training attendance sheets for the employees are provided in Attachment 23. I reviewed all records and noted that Mr. James did not appear to have a yearly training record for 2021. I asked Mr. James for this training certificate. Mr. James was unable to provide his training certificate for 2021. During records review, I observed a training certificate dated for "11/04/2020" for Mr. James. This training certificate is provided in Attachment 24. Mr. James stated he must not have completed annual hazardous waste refresher training in 2021. Therefore, I left the following finding:

NOPF 3 – Failure to refresh hazardous waste training. [40 CFR 262.17(a)(7)(iii)].

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

Manifest and Land Disposal Restriction (LDR) Requirements – Ashley maintained records of manifests on site at the time of inspection dating back three years. Ashley generated approximately 72 manifests over the last three years. I reviewed all manifests and initial LDR forms from the last three years. A manifest is provided in Attachment 25 as an example.

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

5.0 SUMMARY OF FINDINGS

NOPF 1 – Accumulating universal waste for longer than one year. [40 CFR 273.15(a)].

I observed three 5-gallon containers of universal waste batteries. These universal waste containers had accumulation start dates between April and May of 2019.

NOPF 2 – Failure to prepare a quick reference guide upon revising facility contingency plan after May 20, 2017. [40 CFR 262.17(a)(6)→262.262(b)].

During records review, I asked Mr. James for the facility's quick reference guide. Mr. James stated he was not aware this was a requirement and stated the facility did not have a quick reference guide.

NOPF 3 – Failure to refresh hazardous waste training. [40 CFR 262.17(a)(7)(iii)].

During records review, I observed Mr. James did not have a training certificate for 2021. Mr. James stated he must not have completed annual hazardous waste refresher training in 2021. The most recent training certificate was dated "11/04/2020".

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

**Janosh
Wolters**

Digitally signed by
Janosh Wolters
Date: 2022.03.14
20:02:50 -04'00'

Janosh Wolters
Energy Engineer
Date: March 14, 2022

**AMBER
WHISNANT**

Digitally signed by
AMBER WHISNANT
Date: 2022.03.22
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Amber Whisnant
Section Chief
ECAD/CB/RCRA, EPA Region 7
Date: _____

Attachments:

1. Facility Layout (1 page)
2. Ashley Industrial Molding Inc. Photolog (1 page)
3. Ashley Industrial Molding Inc. Photos (8 photos/9 pages)
4. EPA Inspection Checklist (29 pages)
5. Confidentiality Notice (1 page)

6. Receipt for Documents and Samples (1 page)
7. Notice of Preliminary Findings (1 pages)
8. Hazardous Waste Site Info Verification Report for Inspector (1 page)
9. Waste Paint Related Material Waste Profile (6 pages)
10. Hazardous Waste Rags Waste Profile (3 pages)
11. Special Waste Authorization SMC Compound (1 page)
12. Special Waste Authorization Paint Booth Filters (1 page)
13. Parts Washer SDS (9 pages)
14. Wastewater Agreement (3 pages)
15. Air Compressor Invoice (1 page)
16. Forklift Maintenance Invoice (1 page)
17. Universal Waste Lamps Invoice (1 page)
18. Universal Waste Battery Disposal (2 pages)
19. General Trash Invoice (1 page)
20. CAA Log (1 page)
21. Acetone SDS (14 pages)
22. Contingency Plan (25 pages)
23. Training Records (4 pages)
24. Mr. James Training 2020 Training Record (1 page)
25. Manifest (1 page)

Notice of Preliminary Findings

(For Contractor Use Only)

Facility Name: Ashley Industrial Molding Inc.
Facility Address: 951 2nd Ave SE
Oelwein, IA 50662
EPA ID#: IA15014117550 Date: 01/25/2022

Notice: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for the 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 the 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 will make determinations as to what violations may have occurred at your facility.

Citation

Description of Finding

1. 40CFR 273.15(a)
2. 40CFR 262.17(a)(6) → 262.262(b)
3. 40CFR 262.17(a)(7)(iii)

1. Accumulating universal waste for longer than one year.
2. Did not prepare a guide reference guide upon revising facility contingency plan after May 30, 2017.
3. Failure to refresh hazardous waste training annually.

If you have any questions about this Notice or wish to discuss your response, you may call me at 484-678-0675, or Trevor Urban (Compliance Officer) at 913-551-7133.

This Notice prepared by Janosh Walters Date: 01/25/2022

The undersigned person hereby acknowledges receipt of this Notice and has read the same.

Printed Name: Jeremy James Date: 1/25/2022
Signature: [Signature]
Title: PLANT MANAGER