

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

ALTEC – Osceola Body Plant

1001 Furnas Dr.
Osceola, IA 50213
(641) 223 - 8787

EPA ID Number: IAD010256923

On

June 22, 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 Altec Osceola Body Plant (Altec) in Osceola, Iowa on June 22, 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

Altec – Osceola Body Plant:

Breanna Sullivan, EH&S Manager

Scott Metzger, Quality Manager

Bruce Stainbrook, Corporate Environmental Regulatory Manager (participated via telephone)

EPA Representatives, ERG:
Janosh Wolters, Energy Engineer
Anshul Paripati, Chemical Engineer

3.0 INSPECTION PRECEDURES

After arriving unannounced at Altec at approximately 08:00, 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. The facility's main entrance has a security check in. I introduced myself and signed into the visitor's log. The security team contacted Ms. Breanna Sullivan, EH&S Manager and Mr. Scott Metzger, Quality Manager, who greeted us at approximately 08:05 at the main entrance. I introduced myself and presented my inspector credentials to Ms. Sullivan and Mr. Metzger and explained my reason for being on site is to conduct a RCRA CEI. Ms. Sullivan led us to a conference room to begin the opening conference at approximately 08:10. I initiated the opening conference with Ms. Sullivan and Mr. Metzger as Altec's representatives. I presented Ms. Sullivan with my business card, as well as the business card of the EPA Task Order Contracting Officer Representative, Mr. Trevor Urban. Mr. Paripati explained he has not obtained a RCRA credential and was observing the inspection for training purposes. 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 Ms. Sullivan with a copy of the *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections* and reviewed Altec's confidentiality rights. I informed Ms. Sullivan 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. Ms. Sullivan 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, Ms. Sullivan guided us 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 18 SAAs and one CAA. The facility also handles universal waste lamps and batteries in the CAA. In addition, aerosol cans are managed as universal waste and are managed in one location as labeled on the facility layout. The universal waste storage areas were visually inspected. Altec does not use parts washers on site. 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.

Seven 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 Ms. Sullivan with a *Confidentiality Notice*, *Receipt for Documents and Samples*, and *Notice of Preliminary Findings* which she signed as acknowledgement of receipt (see Attachments 5, 6, and 7 respectively). No confidentiality claims were made by Altec on

documents taken off site.

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

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

Altec began operating in 2014 and currently employs approximately 220 people. In 2007, the facility was operated by Astoria. Altec purchased the plant in 2014 and the process has not changed. Altec used to purchase manufactured fiberglass fabrication for trucks from Astoria. Since acquiring the plant, Altec ships manufactured products to other Altec facilities for further assembly. The facility operates on a five-day, two shift schedule. Occasionally, certain employees are offered to work overtime on a Saturday if manufacturing demands must be met. The facility has a building footprint of approximately 150,000 square feet. Altec operations consist of manufacturing fiberglass fabrication for truck bodies. The primary raw materials used are resins, gel coat, fiberglass, steel, solvent, and aluminum. The major manufacturing or processing operations that generate waste streams include gel coating, and painting. The following waste streams are produced: waste resin solution, waste flammable liquids, waste paint related material, waste flammable solids, peroxide waste, non-skid floor coating, z shield 6000, spray booth filters, fiberglass dust, shot blast, used oil, universal wastes, scrap metal, and general trash.

4.2 RCRA Status

According to the *Notification Acknowledgement/Verification Report* (see Attachment 8), Altec notified as a federal Large Quantity Generator (LQG) of D001, F003, and F005 hazardous wastes. I asked Ms. Sullivan to review the *Notification Acknowledgement/Verification Report*, which I provided prior to records review and visual inspection of the waste generation areas. Ms. Sullivan stated the facility contact should be updated. Besides updating the facility contact, Ms. Sullivan stated 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, F003, and F005 hazardous wastes, a generator of used oil, and a small quantity handler (SQH) of universal waste. Altec 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.

Altec was previously inspected by an EPA contractor on March 8, 2017. The inspection led to a NOPF. The findings included: labeling issues with satellite accumulation containers and universal waste accumulation containers, failure to conduct annual training in 2015, failure to make adequate waste determinations, failure to include accurate waste codes on biennial report, and failure to label mercury equipment. I did not observe any repeat findings at the time of the inspection.

4.3 Facility Waste Streams and Management

A Waste Stream and Waste Handling Table for Altec 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 Resin Solution (SDS included in Attachment 9)	Excess resin is sprayed onto fiberglass molds	D001, F003 (based on process knowledge and knowledge of the product)	30 55-gallon containers per month	55-gallon containers in SAAs before transferred to CAA	Clean Safe Technologies in Prince Frederick, Maryland (MDR000526798) to Giant Resource Recovery (ALD070513767) in Attalla, AL for fuel blending
2	Waste Flammable Liquids (Waste Profile included in Attachment 10)	Flushing resin lines	D001, F003 (based on process knowledge and knowledge of the product)	5 55-gallon containers per month	55-gallon containers in SAAs before transferred to CAA	Clean Safe Technologies in Prince Frederick, Maryland (MDR000526798) to Giant Resource Recovery (ALD070513767) in Attalla, AL for fuel blending
3	Waste Paint Related Material (Waste Profile included in Attachment 11)	Clean up of paint booths with acetone	D001, F003, F005 (based on process knowledge and knowledge of the product)	5 55-gallon containers per month	55-gallon containers in SAAs before transferred to CAA	Clean Safe Technologies in Prince Frederick, Maryland (MDR000526798) to Giant Resource Recovery (ALD070513767) in Attalla, AL for fuel blending

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
4	Waste Flammable Solids (Waste Profile included in Attachment 12)	Acetone rags and PPE	D001, F003 (based on process knowledge and knowledge of the product)	Two 55-gallon containers per month	55-gallon containers in SAAs before transferred to CAA	Clean Safe Technologies in Prince Frederick, Maryland (MDR000526798) to Giant Resource Recovery (ALD070513767) in Attalla, AL for fuel blending
5	Peroxide Waste (Waste Profile included in Attachment 13)	Unmixed/excess MEKP catalyst used in resin	D001 (based on process knowledge and knowledge of the product (SDS included in Attachment 14))	Four 55-gallon containers per year	55-gallon containers in SAAs before transferred to CAA	Clean Safe Technologies in Prince Frederick, Maryland (MDR000526798) to Giant Resource Recovery (ALD070513767) in Attalla, AL for fuel blending
6	Non-Skid Floor Coating (Waste Profile included in Attachment 15)	Crushed one gallon paint containers and application tools (rollers, paint brushes, etc.)	D001 (based on process knowledge and knowledge of the product)	Crushed one gallon paint containers and application tools (rollers, paint brushes, etc.)	55-gallon containers in SAAs before transferred to CAA	Clean Safe Technologies in Prince Frederick, Maryland (MDR000526798) to Giant Resource Recovery (ALD070513767) in Attalla, AL for fuel blending

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
7	Z Shield 6000 (Waste Profile included in Attachment 16)	Part tumbler used to clean parts with sharp edges to remove sharp edges	Nonhazardous (based on process knowledge and knowledge of the product (SDS included in Attachment 17))	One 55-gallon container every other month	55-gallon containers in SAAs before transferred to CAA	Clean Safe Technologies in Prince Fredrick, Maryland (MDR000526798) to Giant Resource Recovery (ALD070513767) in Attalla, AL for treatment/disposal
8	Universal Waste Aerosol Cans	RCRA empty aerosol cans from facility maintenance	Exempted (managed as universal waste per 40 CFR 273)	One 55-gallon container every six months	55-gallon container	Clean Safe Technologies in Prince Fredrick, Maryland (MDR000526798) to Giant Resource Recovery (ALD070513767) in Attalla, AL for recycling
9	Spray Booth Filters	Exchanged spray booth filters	Nonhazardous (based on process knowledge, knowledge of the product, and analytical testing (analytical report for gel coat booth filters included in Attachment 18 as an example))	Exchanges booth filters in five booths approximately once per month	Added to 40-yard general trash container	Metro Waste Authority in Des Moines, IA to Metro Park East Landfill in Mitchellville, IA for landfill

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
10	Fiberglass Dust (Landfill Approval Letter included in Attachment 19)	Facility operations	Nonhazardous (based on process knowledge, knowledge of the product, and analytical testing (analytical report included in Attachment 20))	Unknown - 12 supersacks are picked up based on production	Supersacks	Metro Waste Authority in Des Moines, IA to Metro Park East Landfill in Mitchellville, IA for landfill
11	Universal Waste Lamps	Facility maintenance	Exempted (managed as universal waste per 40 CFR 273)	Three 4-foot containers per year	4-foot containers	Clean Safe Technologies in Prince Fredrick, Maryland (MDR000526798) to Giant Resource Recovery (ALD070513767) in Attalla, AL for recycling
12	Universal Waste Batteries	Facility maintenance	Exempted (managed as universal waste per 40 CFR 273)	Less than one 55-gallon container per year	55-gallon container	Clean Safe Technologies in Prince Fredrick, Maryland (MDR000526798) to Giant Resource Recovery (ALD070513767) in Attalla, AL for recycling

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
13	Shot Blast (SDS included in Attachment 21)	Almandine bead shot at small hand size parts to remove imperfections	Nonhazardous (based on process knowledge, knowledge of the product, and analytical report (analytical report included in Attachment 22))	One 55-gallon container every two months	55-gallon containers	Clean Safe Technologies in Prince Fredrick, Maryland (MDR000526798) to Giant Resource Recovery (ALD070513767) in Attalla, AL for recycling
14	Used Oil	Facility maintenance of equipment	Exempted (managed as used oil per 40 CFR 279)	Less than one 55-gallon per year	55-gallon containers	Clean Safe Technologies in Prince Fredrick, Maryland (MDR000526798) to Giant Resource Recovery (ALD070513767) in Attalla, AL for recycling
15	Used Oil Filters	Maintenance of facility equipment from third party contractor	Exempted (managed as used oil per 40 CFR 279)	Taken off site at the time of servicing	Unknown – contractor conducts maintenance on facility equipment as needed	Delta Industries Inc. in Cedar Rapids, IA for recycling
16	Scrap Metal	Facility operations	Excluded (based on management and process knowledge) recycled as scrap metal	One 20-yard container and 40-yard container as needed based on production	20-yard container and 40-yard container	Alter Metal Recycling in Des Moines, IA (IAD981501695) for recycling

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
17	General Trash	Facility operations	Nonhazardous (based on process knowledge and knowledge of the product)	Two 40-yard compactors picked up weekly	40-yard container	Metro Waste Authority in Des Moines, IA to Metro Park East Landfill in Mitchellville, IA for landfill

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

Altec has one Less-Than-90-Day CAA on site, which is located inside a gated area in the southeastern corner of the facility as labeled on the facility layout (see Attachment 1). I visually inspected the CAA and observed a total of thirteen 55-gallon containers of hazardous waste. A total of six 55-gallon container held flammable liquid waste; a total of five 55-gallon containers held waste paint related material waste; one 55-gallon container held peroxide waste, and one 55-gallon container held flammable solids waste (see Attachment 3, Photo 6). The facility managed all these containers as hazardous waste. All hazardous waste containers were closed, 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”. The earliest accumulation start date observed was “6/1/2022” on a 55-gallon container of peroxide waste. June 1, 2022 is within 90 days from the time of the inspection.

I observed adequate aisle space to allow for container inspections and access in the event of a spill. In Attachment 3, Photo 6; it appears the containers lined up against the wall have little to no aisle space, but I was able to comfortably walk in between the containers in the forefront of the photograph and all containers lined up against the wall. In addition, all containers are placed on secondary contaminant pallets in case any container were to spill or leak. I also observed spill control equipment, and related safety equipment within close proximity of the CAA. Based on the amount of aisle space and that all containers are on secondary containment pallets; it appears that any leaking or spilled material could be adequately contained. Operators handling hazardous waste are trained to use their two-way radio system in case of emergencies. I asked Ms. Sullivan if the facility inspected the CAA. Ms. Sullivan stated the facility inspected the CAA at least weekly and had weekly inspection logs.

During records review, Ms. Sullivan provided inspection logs for the CAA. I reviewed the logs and determined the facility was adequately performing weekly inspections of the CAA. An example of a CAA log is provided in Attachment 23.

I did not note any issues or findings at the CAA during the inspection.

In addition, the facility manages universal waste batteries and lamps within the CAA which is further discussed in Section 4.11 of this report.

4.5 Satellite Accumulation Areas

I observed 18 satellite areas during the visual inspection. The table below shows the SAA name or location, waste type, volume of waste observed, and container type.

SAA #	SAA Name or Location	Waste Type	Volume of Waste	Container Type
1	Paint Area	Paint Related Material Waste	25 gallons	55-gallon container
2	Paint Area	Drain Rack Waste	4 gallons	5-gallon container
3	Paint Area	Waste Acetone Waste	20 gallons	55-gallon container
4	Pre-Mount Area	Gel Coat/Liner Waste	50 gallons	55-gallon container
5	Pre-Mount Area	Flammable Solvent Rags	30 gallons	55-gallon container
6	Fiberglass Shop	Waste Acetone	25 gallons	55-gallon container
7	Gel Coat Area	Gel Coat/Liners	20 gallons	55-gallon container
8	Gel Coat Area	Peroxide Waste	5 gallons	55-gallon container
9	Mold Booth	Organic Peroxide Drain Rack	Less than one gallon	1.5-gallon container
10	Demold Area	Glue A & Mix	25 gallons	55-gallon container
11	Demold Area	Glue Part B	20 gallons	55-gallon container
12	Demold Area	Glue A & Mix	10 gallons	55-gallon container
13	Flatting Area	Acralock Cases / Glue Tips	40 gallons	55-gallon container
14	Door Area	Gel Coat/Liners	15 gallons	55-gallon container
15	Door Area	Putty/Adhesive	20 gallons	55-gallon container
16	Assembly Area	Acralock Cases/Glue Tips	10 gallons	55-gallon container
17	Final Assembly Area	Non Skid Waste	1 gallon	55-gallon container
18	Shell Fab Area	Glue Tips/Sealant	30 gallons	55-gallon container

During the visual inspection, I observed the 18 SAAs. An example photograph was taken for how all SAAs contained signage explaining facility management requirements for each SAA (see Attachment 3, Photo 3). During the visual inspection, I observed two SAA 55-gallon containers located directly next to each other in the pre-mount area (see Attachment 3, Photo 2). I also observed a red step container that was used to accumulate biohazard waste as shown in Attachment 3, Photo 2. I observed a 55-gallon container of gel coat liner waste being accumulated in SAA #4 and a 55-gallon container of flammable solvent rags being accumulated in SAA #5. The 55-gallon container in SAA #4 was accumulating approximately 50 gallons of waste and the 55-gallon container in SAA #5 was accumulating approximately 30 gallons of waste. Both containers closed, in good condition, labeled with the words “Hazardous Waste”, and labeled with an indication of the nature of the hazard. I asked Ms. Sullivan when these containers were moved out of the SAA locations. Ms. Sullivan stated when a SAA container is full, it is moved within 72-hours to the CAA. I asked Ms. Sullivan if the facility ensures no more than 55-gallons of hazardous waste is accumulated in this location. Ms. Sullivan stated because the SAA containers were not accumulating the same type of hazardous waste, each container is allowed to accumulate no greater than 55-gallons. I explained to Ms. Sullivan that 40 CFR 262.15(a) states “A generator may accumulate as much as 55 gallons of non-acute hazardous waste and/or either one quart of liquid acute hazardous waste listed in § 261.31 or § 261.33(e) of this chapter or 1 kg (2.2 lbs.) of solid acute hazardous waste listed in § 261.31 or § 261.33(e) of this chapter in containers at or near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with the requirements of parts 124, 264 through 267, and 270 of this chapter, provided that all of the conditions for exemption in this section are met.” Ms. Sullivan stated she would contact Mr. Stainbrook for facility compliance in previous inspections as this management practice has not changed. During the closing conference, Mr. Stainbrook stated he understands, and the facility would need to discuss the best option for moving one of the SAAs. Mr. Stainbrook stated he would need to ensure the SAA is still within the same area as the wastes accumulated in both these SAAs are generated in the pre-mount area. The facility appeared to be accumulating more than 55-gallons of hazardous waste in one area which may be interpreted as one SAA. Therefore, the following finding was left with the facility:

NOPF 1 – Failure to accumulate no more than 55-gallons of hazardous waste in one SAA. [40 CFR 262.15(a)].

In addition, I observed a 1.5-gallon container in SAA #9 accumulating excess peroxide being drained from other spent MEKP 1.5-gallon containers. I asked Ms. Sullivan where the 1.5-gallon container was taken once filled. Ms. Sullivan stated she was unaware and would need to ask an operator. Ms. Sullivan asked Shawn Huth, EHS Technician what happens to the accumulated waste in SAA #8. Mr. Huth stated the accumulated peroxide waste is consolidated in the 55-gallon container in SAA #8. I explained to Ms. Sullivan that waste accumulated in a SAA cannot be transferred or consolidated into another SAA container. As an oversight I did not photograph SAA #8 or SAA #9, but I observed that the SAA’s were approximately 100 meters away from each other and in separate manufacturing areas. Ms. Sullivan stated she understands that waste

generated in a SAA must be transferred to a CAA or hauled off site. Therefore, I left the following finding:

NOPF 5 – Failure to remove SAA containers to a CAA or an on-site interim status or permitted treatment, storage, or disposal facility, or an off-site designated facility. [40 CFR 262.15].

Despite the issues discussed above, all SAA containers 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 no additional issues or findings were noted.

4.6 Resin/Paint/Gel Coat Booths

The facility uses fiberglass molds to manufacture truck bodies primarily for telecommunication and internet service trucks. This requires the facility to use molds where resin is sprayed into the molds and creates the truck body. During the resin operation, a catalyst is used to form the fiberglass. The facility uses a methyl ethyl ketone peroxide catalyst (MEKP). The facility generates approximately four 55-gallon containers of unusable or excess MEKP waste per year. The SDS for this catalyst is provided in Attachment 14. The waste profile is provided in Attachment 13. The excess resin spray that is collected is placed into 55-gallon containers and managed as a hazardous waste. In addition, this process requires the facility to flush acetone through resin spray guns which is accumulated in 55-gallon containers and managed as a spent solvent hazardous waste. The SDS for the acetone used is provided in Attachment 24. The SDS for resin solution and waste flammable liquids waste profile are provided in Attachment 9 and 10, respectively. These booths operate the same as any type of industrial paint booth. An example of paint booths, resin booths, and gel coat booths can be seen in Attachment 3, Photo 5.

The facility uses a gel coat on products which generates hazardous wastes. Gel coat liners are generated and managed as a hazardous waste. The gel coat liner analytical report is provided in Attachment 18. The facility also conducts painting operations on site. Painting operations include painting manufactured truck bodies. This generates waste paint related material waste which is managed as a hazardous waste in 55-gallon containers. The waste profile is provided in Attachment 11. I asked Ms. Sullivan if any of the booths had filters. Ms. Sullivan stated all booths contain filters that are exchanged approximately once per year. Booths are managed by a pressure gauge which notifies staff when filters need to be replaced. All five booths on site are replaced once per year and filters are managed as a nonhazardous waste. Ms. Sullivan stated excess spray is not sprayed directly into the filters and the facility has conducted analytical testing on booth filters to ensure that the nonhazardous waste determination was correct. The gel coat analytical report in Attachment 18 is an example of how all paint booth filters would be sampled and tested.

Fiberglass manufacturing also generates fiberglass dust waste. Ms. Sullivan explained the facility has conducted analytical testing on fiberglass dust waste and the facility determined it is a

nonhazardous waste. The fiberglass dust analytical report is shown in in Attachment 20. I asked Ms. Sullivan how fiberglass dust is accumulated and stored on site. Ms. Sullivan explained all fiberglass dust is conveyed into supersacks that are then stated for pick up by Metro Waste Authority in Des Moines, IA. Metro Waste Authority disposes of the waste at the Metro Park East Landfill in Mitchellville, IA.

During the visual inspection of the booth areas, I asked Ms. Sullivan if solvent rags are generated during operations. Ms. Sullivan stated the facility manages all rags generated from cleaning paint guns or clean up of any booth area as a hazardous waste. Ms. Sullivan explained the facility prefers to manage the rags as hazardous waste and stores all rags generated in the 55-gallon container observed in SAA #5.

I did not note any issues or concerns regarding the management of wastes from the operations discussed above.

4.7 Non-Skid Floor Coating

Ms. Sullivan explained the facility crushes used floor coating containers and manages them as a D001 hazardous waste. Ms. Sullivan stated the containers are RCRA empty, but the facility is required by corporate direction to manage all of these containers as a hazardous waste out of an abundance of caution. The waste profile is included in Attachment 15. The waste is accumulated in 55-gallon containers and includes paint containers, paint brushes, and rollers. I did not note any issues or concerns regarding the management of this waste.

4.8 Part Tumbler

During the visual inspection, I observed a facility part tumbler on site (see Attachment 3, Photo 7). I asked Ms. Sullivan how the part tumbler was used. Ms. Sullivan explained the part tumbler was used to clean parts with sharp edges to remove sharp edges. Ms. Sullivan stated the facility uses a solution in the part tumbler to help remove sharp edges. The solution's SDS is provided in Attachment 17. It is a nonhazardous solution and Ms. Sullivan stated approximately one 55-gallon container of spent solution is accumulated every other month. Ms. Sullivan stated the facility accumulates the spent solution during servicing in a 55-gallon container and manages the waste as a nonhazardous waste. I did not note any issues or concerns with the management of the part tumbler waste solution.

4.9 Shot Blast

The facility conducts shot blasting operations on site. An almandine bead is shot at small hand-size parts to remove imperfections. The SDS for the bead used is provided in Attachment 21. An analytical report showing results from a sampling event of the shot blast is provided in Attachment 22. Shot blast is accumulated in 55-gallon containers and managed as a

nonhazardous waste. I did not note any issues or concerns regarding the management of shot blast waste.

4.10 Aerosol Cans

During the visual inspection, I observed one 55-gallon container next to SAA #4 and SAA #5 that was holding universal waste aerosol cans (see Attachment 3, Photo 4). Ms. Sullivan explained the facility uses aerosol cans until RCRA empty and manages the RCRA empty cans as universal waste. Ms. Sullivan explained the facility does not puncture aerosol cans. Ms. Sullivan stated the facility generates and ships off site approximately one 55-gallon container every six months. I did not observe any issues or concerns with the management and generation of used aerosol cans on site.

4.11 Universal Waste Batteries and Lamps Accumulation Area

Altec manages universal waste lamps and batteries within the CAA as labeled on the facility layout (see Attachment 1). I observed one 4-foot container accumulating universal waste lamps. The container was labeled “Universal Waste Lamps” and the accumulation start date observed was “4/28/2022”. In addition, I observed one box that was 3 feet wide by three feet tall accumulating universal waste batteries. The container was labeled with the words “Universal Waste Batteries” and with an accumulation start date of “4-1-2022”.

I reviewed the management of all universal waste storage areas throughout the facility and no issues or findings were noted.

4.12 Used Oil

At the time of the inspection, I did not observe any used oil being accumulated on site. Ms. Sullivan explained used oil is generated during maintenance events on facility equipment and is accumulated in small containers varying in size dependent on the piece of equipment being serviced. Ms. Sullivan stated the facility labels the container with the words “Used Oil” and Clean Safe Technologies; the facility’s hazardous waste vendor hauls the used oil off site during regular pick-ups. In addition, I did not observe any used oil filters being accumulated on site. Ms. Sullivan explained that Delta Industries, Inc. in Cedar Rapids, IA services the facility’s air compressors. Used oil filters are punctured and hot drained and collected in a 55-gallon container. Delta Industries, Inc. hauls off all used oil filters at the time of servicing air compressors.

I did not note any issues or findings regarding used oil during the visual inspection.

4.13 Scrap Metal

During the visual inspection, I observed one 20-yard container and one 40-yard container accumulating scrap metal. Ms. Sullivan explained scrap metal is accumulated in these containers and hauled off site by Alter Metal Recycling in Des Moines, IA. Ms. Sullivan was unable to estimate how often the scrap metal containers are picked up because it varies based on production and customer orders. I did not note any issues or concerns regarding scrap metal on site.

4.14 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 CAA and SAAs (as noted in Section 4.4 and 4.5 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 was in a binder and was reviewed while on site. The contingency plan included a complete emergency evacuation plan, a list of emergency response equipment and describes their capabilities. The plan also included emergency response procedures, emergency coordinators and contact information. However, when I requested a copy of the contingency plan during records review, Ms. Sullivan stated she would need to ask Mr. Stainbrook if she was allowed to print out and provide me with a copy. Mr. Stainbrook then called the conference room where the records review was taking place and stated the current contingency plan was confidential business information (CBI). Mr. Stainbrook then stated the complete contingency plan had not been provided to emergency response agencies because it was a CBI document. I explained to Mr. Stainbrook that because ALTEC is a LQG of hazardous waste, per 40 CFR 262.17(a)(6)→262.261(a), ALTEC is required to submit contingency plan to emergency response agencies. Due to this requirement, the document would be a public document and therefore, did not appear to be CBI, Mr. Stainbrook stated an abbreviated version was provided to emergency response agencies. I then asked Mr. Stainbrook to provide me with a copy of the contingency plan that was submitted to emergency response agencies. Mr. Stainbrook stated he believes this document to be CBI. I explained that information submitted to or obtained by the EPA during or after an inspection, ALTEC may assert a confidentiality claim on information that it believes is a trade secret or privileged or confidential commercial or financial information, which is protected under Exemption 4 of the Freedom of Information Act (FOIA) at 5 U.S.C. 522(b)(4). I explained to Mr. Stainbrook that I am authorized to collect and handle CBI. I explained this is stated on my inspector credential that Ms. Sullivan and Mr. Metzger were presented during the opening conference. Mr. Stainbrook stated he would not allow Ms. Sullivan or Mr. Metzger to provide me with a copy of the contingency plan without signing a document that the contingency plan would not be shared with the public. I explained to Mr. Stainbrook that I am not able to sign any such form and that he appears to be denying me access to required facility documents. Mr. Stainbrook allowed Mr. Metzger and Ms. Sullivan to provide me with the notification of delivery to the response

agencies and is provided in Attachment 25. Mr. Stainbrook then explained the facility had two contingency plans but only submitted one to the local emergency response authorities. I asked Mr. Stainbrook which contingency plan was provided to local authorities. Mr. Stainbrook sent Ms. Sullivan a copy of the one provided to emergency response agencies which I reviewed as the facility's current contingency plan. I asked Mr. Stainbrook for a copy of the plan sent to emergency response authorities. Mr. Stainbrook restated that he believes this document to CBI and that he would not allow Mr. Metzger or Ms. Sullivan to provide me with a copy without signing a form stating it would not be released to the public. I explained once again that I am not able to sign such a document and that per my credential, I am authorized to manage documents claimed as CBI. In addition, I explained that if the document was provided to emergency response authorities, it does not appear to be CBI. The notification date on the contingency plan provided to emergency response authorities was May 5, 2017 which coincides with the notification of delivery provided in Attachment 25.

However, the contingency plan I reviewed that was sent from Mr. Stainbrook had a revision date of November 18, 2021. I asked Ms. Sullivan if the plan I was reviewing was up to date and accurate. Ms. Sullivan stated emergency coordinators have changed and the plan has not been updated and provided to local authorities. In addition, I asked Ms. Sullivan if the facility prepared a quick reference guide. Ms. Sullivan stated the facility had prepared a quick reference guide. I reviewed the quick reference guide and did not observe a list and description of hazardous waste described in layman's terms. In addition, Ms. Sullivan stated the quick reference guide has not been submitted to emergency response agencies. The quick reference guide is provided in Attachment 26. Based on the facility's failure to update the contingency plan, failure to provide all requirements within the quick reference guide, and submit the quick reference guide to emergency response agencies, I left the following findings:

NOPF 2 – Failure to update contingency plan with new emergency coordinator. [40 CFR 262.263(d)].

NOPF 3 – Failure to include a list and description of hazardous waste in layman's terms in the quick reference guide. [40 CFR 262.17(a)(6)→262.262(b)(1)].

NOPF 4 – Failure to submit quick reference guide to emergency response agencies as needed. [40 CFR 262.17(a)(6)→262.262(c)].

However, EPA may add additional findings for failing to update emergency coordinators and submit the November 18, 2021 contingency plan to local emergency authorities. Additionally, findings may be added because the facility did not appear to have a complete contingency plan as required by 40 CFR 262.17(a)(6) → 262.260(a).

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 Altec 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 Altec receive, I determined the training to be sufficient. Ms. Sullivan stated annual refresher trainings are tracked via attendance sheets. Ms. Sullivan showed me the attendance sheets during records review. In addition, employees complete a short quiz after the training is completed. I reviewed all employees who manage hazardous waste and emergency coordinators to ensure all personnel receive an annual hazardous waste refresher training. I determined all emergency coordinators and employees who require annual refresher training were up to date on their trainings. Examples of sign in sheets and training records is provided in Attachment 27.

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

Manifest and Land Disposal Restriction (LDR) Requirements – Altec maintained records of manifests on site at the time of inspection dating back three years. Altec generated approximately 66 manifests over the last three years. I reviewed all 66 hazardous waste manifests. Specifically, I reviewed manifests to ensure the facility maintained manifest for 3 years; has ALTEC's EPA ID number on the manifests; has generator name, address, and phone number on manifest; has designated facility name, address and EPA ID number on manifest; for signatures by generator, transporter, and destination facility; ensure the completed manifest is on record; and all requirements set forth in 40 CFR 262.20. A manifest and corresponding LDR forms are provided in Attachment 28 as an example. I did not note any findings or concerns regarding manifests.

5.0 SUMMARY OF FINDINGS

During the visual inspection, I observed two SAA 55-gallon containers located directly next to each other in the pre-mount area (see Attachment 3, Photo 2). The facility appeared to be accumulating more than 55-gallons of hazardous waste in one area which may be interpreted as one SAA.

NOPF 1 – Failure to accumulate no more than 55-gallons of hazardous waste in one SAA. [40 CFR 262.15(a)].

It appeared the facility failed to update the emergency coordinators for the most recent contingency plan from November 18, 2021. In addition, the facility failed to provide all requirements within the quick reference guide and failed to submit the quick reference guide to emergency response agencies.

NOPF 2 – Failure to update contingency plan with new emergency coordinator. [40 CFR 262.263(d)].

NOPF 3 – Failure to include a list and description of hazardous waste in layman's terms in the quick reference guide. [40 CFR 262.17(a)(6)→262.262(b)(1)].

NOPF 4 – Failure to submit quick reference guide to emergency response agencies as needed. [40 CFR 262.17(a)(6)→262.262(c)].

At the time of the inspection, the facility was accumulating waste in a 1.5-gallon container in SAA #9 and transferring the waste into a 55-gallon container in SAA #8. I observed that the SAA's were approximately 100 meters away from each other and in separate manufacturing areas.

NOPF 5 – Failure to remove SAA containers to a CAA or an on-site interim status or permitted treatment, storage, or disposal facility, or an off-site designated facility. [40 CFR 262.15].

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

**Janosh
Wolters**

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Wolters
Date: 2022.08.16 17:31:22
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Janosh Wolters
Energy Engineer
Date: August 16, 2022

**CANDACE
BEDNAR**

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Date: 2022.08.19 15:17:42 -05'00'

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

Attachments:

1. Facility Layout (1 page)
2. ALTEC Photolog (1 page)
3. ALTEC Photos (7 photos/8 pages)
4. EPA Inspection Checklist (30 pages)
5. Confidentiality Notice (1 page)
6. Receipt of Documents and Samples (1 page)
7. Notice of Preliminary Findings (1 page)
8. Notification Acknowledgement/ Verification Report(1 page)
9. Resin SDS (7 pages)

10. Flammable Liquid Waste Profile (1 page)
11. Waste Paint Related Material Waste Profile (1 page)
12. Flammable Solids Waste Profile (1 page)
13. MEKP Waste Profile (2 pages)
14. Peroxide SDS (29 pages)
15. Nonskid Waste Profile (1 page)
16. Z Shield Waste Profile (1 page)
17. Z Shield SDS (6 pages)
18. Gel Coat Booth Analytical Report (22 pages)
19. Fiberglass Landfill Approval Letter (2 pages)
20. Fiberglass Analytical Report (19 pages)
21. Shot Blast SDS (8 pages)
22. Shot Blast Analytical Report (12 pages)
23. CAA Log (1 page)
24. Acetone SDS (6 pages)
25. Contingency Plan Notification (5 pages)
26. Quick Reference Guide (12 pages)
27. Training Records (3 pages)
28. Manifest (4 pages)

Notice of Preliminary Findings

(For Contractor Use Only)

Facility Name: Alter Osceola Body Plant

Facility Address: 1001 Furnas Dr. Osceola, Iowa 50213

EPA ID#: IAD010256923

Date: 6/22/2022

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. 40 CFR 262.15(a)
2. 40 CFR 262.263(d)
3. ~~40 CFR 262.262~~ 33w
40 CFR 262.17(a)(6) → 262.262(b)(1)
through (b)(8)
4. 40 CFR 262.17(a)(6) → 262.262(c)
5. 40 CFR 262.15

1. Failure to accumulate no more than 55 gallons of hazardous waste in a SAA.
2. Failure to update contingency plan with new emergency coordinator.
3. Failure to include a list and description of hazardous waste in layman's terms in the quick reference guide.
4. Failure to submit quick reference guide to emergency response agencies as needed.
5. Failure to remove SAA containers to only a CAA or an on-site interim status or permitted treatment, storage, or disposal facility, or an off-site designated facility. (SAA container transferred to a separate/other SAA)

If you have any questions about this Notice or wish to discuss your response, you may call me at

484-678-8675, or Trevor Urban (Compliance Officer)

at 913-551-7133.

This Notice prepared by Janosh Walters Date: 6/22/2022

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

Printed Name: Breanna Sullivan Date: 6/22/2022

Signature: Breanna Sullivan

Title: EHS Manager

Page 1 of 1