REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

IOWA LIMESTONE COMPANY
800 River Drive
Alden, Iowa 50006
515-859-3383

EPA ID Number: IAD041103086

On

June 16, 2021

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 Iowa Limestone Company (ILC) at 800 River Drive in Alden, 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

ILC:

Matt Hruska, Plant Manager
Roger Haglund, Laboratory Technician

Toeroek Team:

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

INSPECTION PROCEDURES

Prior to the CEI at ILC on June 16, 2021, I conducted a drive-by visual inspection. I did not observe any areas of concern during the drive-by. Upon my arrival, I entered the office and was met by Mr. Hruska. I introduced myself to Mr. Hruska and explained the purpose of the CEI to him.

I conducted an entry briefing with Mr. Hruska, during which I presented my business card and EPA credential letter to him. 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 Mr. Hruska 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, he would be presented with a Confidentiality Notice (Notice) with which he could make or not make a claim of confidentiality for the facility. I also provided Mr. Hruska 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 he 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
- Recycling Electronics: A Guide for Businesses
- Lead-Based Paint Activities: Handling and Disposal
- Battery Recycling/Disposal
- Management of Fluorescent Lamps for Businesses
- Incompatible Chemicals
- Universal Wastes – Including Aerosol Cans
- 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. Hruska (Attachment 1). Based on this review and observations during the CEI, I updated the contact information for Mr. Hruska, added used oil generator to types of regulated activity, and updated hazardous wastes handled by removing D001 and adding D002 and D039.

I conducted the visual inspection of the facility, accompanied by Mr. Hruska. Following the visual inspection, I requested receipts and bills of lading for waste shipments and other documentation related to waste generation and management. Facility information gathered during and after 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. Hruska. During the exit briefing, I provided a Receipt for Documents and Samples, which Mr. Hruska signed, acknowledging receipt (Attachment 3). I provided Mr. Hruska the Notice, which he signed indicating no confidential business information had been provided (Attachment 4). I also provided Mr. Hruska a Notice of Preliminary Findings (NOPF), which he signed to acknowledge receipt (Attachment 5).

A map of the facility was not available during the CEI, although maps of individual sections of the facility were. Maps of the buildings that included the shops and the laboratory are included in Attachment 6. An aerial photograph of the facility was downloaded after the CEI and is in Attachment 7. The nine photographs taken during the CEI are in Attachment 8.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

ILC quarries limestone, then processes it for use as an animal nutritional supplement and soil amendment. Activities include crushing, grading, and pelletizing. The facility also performs light maintenance activities on its own vehicles. ILC began operations at its current location in the 1930s. The facility consists of approximately 25 acres, not including the quarry itself, with approximately nine buildings and multiple silos and tanks. The facility currently employs approximately 45 personnel who support 24-hour operations, Monday through Friday, over three shifts.

According to Mr. Hruska, no significant wastes are generated from quarrying or processing activities. He said that dust from the emissions control system is also sold as a product to manufacture liquid calcium supplements.

During the entry briefing and visual inspection, Mr. Hruska described facility operations and waste generation processes in the quality control laboratory and the two shops. He explained that the facility only performs light engine maintenance; significant engine and body repair on vehicles is performed by Ziegler CAT in Mason City, Iowa. Engine maintenance and equipment repair in the shops generates used oil and used oil filters, both of which are managed according to Title 40 *Code of Federal Regulations* (40 CFR) Part 279. The facility also has a parts washer, which generates spent parts washer solvent. Spent parts washer solvent is considered hazardous waste. Facility vehicles and equipment are also infrequently rinsed to remove lime dust. The wash water is considered nonhazardous by the facility.

The facility tests limestone product in its onsite laboratory. Quality control activities generate waste acids, which are considered hazardous waste. The facility also generates lab pack wastes during occasional cleanout events to remove expired or obsolete chemicals.

Facility maintenance generates used lamps and general trash. Used lamps are green-tipped fluorescent lamps. They are considered nonhazardous and are consolidated with the general trash. General trash, such as office-type and packaging waste, is considered nonhazardous waste and is collected for landfill disposal.

The facility has never been inspected, although EPA conducted a RCRA outreach compliance assistance visit (CAV) in 2009. No findings or deficiencies were reported from the CAV.

2. RCRA Status

ILC was identified as a very small quantity generator (VSQG) of hazardous waste (generating less than 100 kilograms [kg] of hazardous waste per calendar month) on the Verification Report provided by EPA (Attachment 1). During the CEI, I concluded that ILC is still operating as a VSQG of hazardous waste. The facility generates approximately 5 liters (5 kg) of waste acids per month. Approximately once a year, during a single event, the facility also generates approximately 15 gallons of spent parts washer solvent (approximately 50 kg at 3 kg per gallon). As needed, but not more frequently than once a year, the facility also generates lab pack wastes. During the most recent event in August 2019, the facility generated 32 pounds of hazardous waste (approximately 15 kg). Therefore, I determined that ILC's hazardous waste generation rate is well below the VSQG threshold and inspected the facility as such. I also inspected the facility as a used oil generator.

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 interview with Mr. Hruska, documents provided by Mr. Hruska during the inspection, the visual inspection, and documents downloaded by me after the inspection.

Waste acids are generated during quality control activities. The facility considers the waste acids to be characteristic corrosive waste (D002) based on process and product knowledge and on testing in the laboratory. During my inspection of the laboratory, Mr. Haglund estimated that the facility generates approximately 200 milliliters of waste acid per test run and completes approximately 24 test runs per month, for a total of approximately 5 liters of waste acids per month.

The waste acids are discharged to a sink in the laboratory. The sink is plumbed to a small tank in the adjacent shop (Attachment 8, Photograph 7). According to Messrs. Hruska and Haglund, the water is pumped out of this intermediate tank once a week, into a drain in the floor of the shop which is connected to a 1000-gallon concrete sump just outside the shop (Attachment 8, Photograph 9). Mr. Hruska said that this sump also receives wash water from occasional rinsing of vehicles and equipment to remove lime dust, as described below. He said that purge water

from chlorination testing of the onsite drinking water system is also discharged to the sump. Three or four times a year, the water is pumped out of the sump and onto the ground. Mr. Hruska estimated that 85 percent of the water in the tank is from purging the drinking water system. According to an email received from Mr. Hruska on June 18, the pH of the water when it leaves the intermediate tank is less than 2, but the water leaving the sump is between 7 and 8 when it is discharged to the ground (Attachment 9). Because the water has a nonhazardous pH at the time of discharge, I concluded that the waste had been neutralized as allowed by 40 CFR 262.14(a)(5) and RCRA Online memo 13778.

I did not observe any deficiencies related to waste acids.

Lab pack wastes are generated during occasional cleanouts of expired or obsolete chemicals. The facility considers lab pack wastes to be hazardous or nonhazardous based on product and process knowledge. According to Mr. Hruska, the laboratory cleanouts are episodic and are not more frequent than once a year. The most recent lab pack disposal event was in August 2019 (Attachment 10). During that event, the facility sent 32 pounds of characteristic corrosive waste for disposal (approximately 15 kg). The waste was collected by and transported to Metro Waste Authority in Bondurant, Iowa. I did not observe any lab pack wastes during the inspection.

Spent parts washer solvent is generated during approximately annual servicing of the facility's single parts washer (Attachment 8, Photograph 8). The facility considers the spent parts washer solvent characteristic hazardous waste (D039) based on product and process knowledge. According to the safety data sheet (Attachment 11), the solvent consists of petroleum distillates and has a flashpoint of 148°F, so is not ignitable. However, because the solvent is recycled, it may contain enough tetrachloroethene to be considered hazardous waste. According to Mr. Hruska, the solvent is collected approximately once a year. He could not find the most recent bill of lading, but estimated that it had been last collected in November 2019. The spent parts washer solvent is collected by Safety-Kleen of Des Moines, Iowa, for recycling. I did not observe any spent solvent during the inspection.

Wash water is generated during rinsing of facility vehicles and equipment to remove lime dust. The facility considers the wash water to be nonhazardous based on product and process knowledge. Mr. Hruska was not sure how much wash water was generated, but he said that it was generated infrequently. According to Mr. Hruska, wash water flows into a drain in the floor of the shop which is connected to a 1000-gallon sump just outside the shop (Attachment 8, Photograph 9). Mr. Hruska said that this sump also receives waste acids from the laboratory, via an intermediate tank (as described above), and purge water from chlorination testing of the onsite drinking water system. Three or four times a year, the water is pumped out of the sump and onto the ground. Mr. Hruska estimated that 85 percent of the water in the tank is from purging the drinking water system. According to an email received from Mr. Hruska on June 18, the pH of the water in the sump is between 7 and 8 when it is discharged to the ground (Attachment 9). I did not observe any deficiencies related to wash water.

Used oil is generated during servicing of facility vehicles and equipment in the truck shop and the east shop. The facility manages used oil per the requirements of 40 CFR Part 279. According to Mr. Hruska, the facility generates approximately 500 gallons of used oil per year. It is initially

accumulated in drain pans and smaller containers, then consolidated in a 500-gallon tank in the oil shed associated with the truck shop. Used oil is collected for recycling by Cedar Falls Oil of Cedar Falls, Iowa, and it was most recently collected in December 2020 (Attachment 12).

During the CEI, I observed the used oil storage tank in the truck shop oil shed (Attachment 8, Photograph 1). The tank was in good condition and labeled as "used oil." I also observed containers into which used oil filters were draining (Attachment 8, Photographs 2, 4, and 6). According to Mr. Hruska, filters are allowed to drain into these containers for more than one shift. As a result, I concluded that these drain containers met the definition of used oil storage containers. Neither container was labeled, as required by 40 CFR 279.22(c)(1) (**NOPF No. 1**). I provided compliance assistance regarding labeling of used oil storage containers.

Used oil filters are generated during maintenance of vehicles in the truck shop and the east shop. The facility manages used oil filters per the requirements of 40 CFR Part 279. Mr. Hruska was not sure of the generation rate for used oil filters. He said that used oil filters were also collected for recycling by Cedar Falls Oil, but he could not find a receipt or bill of lading for used oil filters during the inspection.

During the CEI, I observed two full 55-gallon containers of used oil filters in or near the truck shop oil shed (Attachment 8, Photographs 2 and 5). The containers were both in good condition and labeled as "used oil." I also observed both unpunctured canister and open used oil filters draining into used oil storage containers in the truck and east shops (Attachment 8, Photographs 2, 4, and 6). Neither container was labeled, as required by 40 CFR 279.22(c)(1) (**NOPF No. 1**). I provided compliance assistance regarding labeling of used oil storage containers.

Used lamps are generated during replacement of spent lamps. According to Mr. Hruska, the facility has transitioned to light emitting diode (LED) lamps in most of the facility, but still generates some green-tipped, lower mercury fluorescent lamps. The facility considers the used lamps nonhazardous based on product and process knowledge. According to Mr. Hruska, the facility generates approximately 50-100 used lamps per year. Used lamps are consolidated with the general trash. I provided compliance assistance regarding lamp recycling.

General trash consists of office- and packaging-type refuse generated at the facility, as well as used lamps and empty aerosol cans. The facility considers general trash to be nonhazardous waste based on product and process knowledge. General trash is accumulated in several roll-off containers around the facility. General trash is collected by McDowell and Sons of Iowa Falls, Iowa, and transported to the Rural Iowa Landfill in Eldora, Iowa. During the CEI, I observed the general trash accumulation containers inside the facility and the roll-off container outside the facility and noted no deficiencies.

4. Summary of Preliminary Findings

In summary, as part of the CEI, I found that the facility failed to label used oil storage containers with the words "used oil," as required by 40 CFR 279.22(c) (**NOPF No. 1**). 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.

Heather K. Wood
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Date: 2021.08.05 19:31:19 -05'00'
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Heather K. Wood
Inspector, Tetra Tech Inc.

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

Attachments:

1. Hazardous Waste Site Info Verification Report (2 Pages)
2. Data Gathering Worksheets and Checklists (15 Pages)
3. Receipt for Documents and Samples (1 Page)
4. Confidentiality Notice (1 Page)
5. Notice of Preliminary Findings (1 Page)
6. Maps of Facility Buildings (2 Pages)
7. Aerial Image of the Facility (1 Page)
8. Photographic Documentation (Photolog and 9 Images) (6 Pages)
9. Email from Matthew Hruska (3 Pages)
10. Bill of Lading for Lab Pack Wastes (1 Page)
11. Safety-Kleen Premium Solvent SDS (9 Pages)
12. Used Oil Receipt (1 Page)