

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

LIBERTY ANODIZING

607 E A Street
West Liberty, Iowa 52776
(319) 627-4112

EPA ID Number: IAR000001792

On

March 8, 2023

By

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 (ECAD), I conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Liberty Anodizing, located in West Liberty, Iowa, on March 8, 2023. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. During the inspection, I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. This inspection report and attachments present the results of the CEI.

2.0 PARTICIPANTS

Liberty Anodizing:

- Todd Hormel, Owner (26 years with facility, 3 months as owner)
- Janeen Sturms, Office Manager

EPA:

- Mark Holcomb, Civil Investigator/Inspector (SEE)

3.0 INSPECTION PROCEDURES

On March 8, 2023, I arrived unannounced at the shop's main entrance at about 1330 hours. Initially, I conducted a visual reconnaissance of the facility searching for areas of concern observable from the adjacent public roadways and parking lots. I identified no environmental issues or concerns during this preliminary examination. I entered the facility through the main entrance and entered the business office. I introduced myself to the Office Manager, Janeen Sturms. Ms. Sturms introduced me to the owner, Mr Todd Hormel. Mr. Hormel told me there were currently no specific COVID-19 visitor requirements but there were several items of safety

personal protective equipment required for our visual inspection at this facility including protective boots and eye protection. Mr. Hormel stated that he was the primary contact for hazardous waste at this facility and had been with the company for 26 years but had recently become the owner as of January 3, 2023, about three months prior.

At the opening conference, I presented my EPA ID and credentials to Mr. Hormel. I next explained the purpose and procedures of the inspection. I then presented Mr. Hormel with a copy of RCRA Section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented him with a copy of Title 18 U.S. Code, Sections 1001 and 1002. I made him aware of his confidentiality rights and informed him that a Confidentiality Notice would be provided at the end of the inspection to make a confidentiality claim if he so desired. Mr. Hormel acted as the official facility representative during the inspection.

The inspection CEI consisted of a discussion of facility operations, waste generation, and waste management; a visual inspection of active waste generation and management areas; and a review of waste management records.

I conducted a visual inspection of the following areas:

- Production Area
- Wastewater Pretreatment Room
- Warehouse
- Outside

See Attachment #1 for the aerial/map views of the facility.

Document photocopies and photographs were collected as inspection documentation (see Attachments #1-8 and Photos 1-6). The photo log is included as Attachment #2. Information collected during the inspection is documented on an Entry/Exit checklist, the hazardous waste compliance checklists, and in a notebook. I reviewed documents including the following: Safety Data Sheets (SDS), and manifests. I followed the inspection procedures detailed in the RCRA CEI Standard Operating Procedure 2321.01E, unless noted otherwise.

At the conclusion of the inspection, I summarized my findings and recommendations with Mr. Hormel. I provided Mr. Hormel with a Receipt for Documents (see Attachment #3), a Confidentiality Notice (see Attachment #4), and a Notice of Preliminary Findings (NOPF) (see Attachment #5), which he signed as acknowledgement of receipt. No claim of confidential business information was made by Mr. Hormel.

I provided inspection and compliance assistance documents to Mr. Hormel during the inspection, some as paper versions and some in electronic PDF via email, that included the following:

- *RCRA Section 3007(a) (EPA Handout)*
- *Title 18 U.S. Code, Sections 1001 and 1002 (EPA Handout)*
- *Confidentiality Notice (Top page of the completed carbonless transfer set)*
- *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA In Connection with Inspections (EPA Handout)*

- *Receipt for Documents and Samples (Top page of the completed carbonless transfer set)*
- *NOPF with Instructions for Responding on back of form (top page of the completed carbonless transfer set)*
- *Instructions for Responding to a NOPF (EPA Handout)*
- *U.S. EPA Small Business Resource Information Sheet (EPA Handout)*
- *Solvent-Contaminated Wipes Final Rule Chart (EPA Handout)*
- *Recycling Electronics (Iowa Department of Natural Resources - IDNR Handout)*
- *Lead-Based Paint Activities (IDNR Handout)*
- *Excluded Solvent-Contaminated Wipe Rule (IDNR Handout)*
- *Battery Recycling/Disposal (IDNR Handout)*
- *Management of Fluorescent Lamps for Businesses (IDNR Handout)*
- *Incompatible Chemicals (IDNR Handout)*
- *Universal Wastes Including Aerosol Cans (IDNR Handout)*
- *TCLP Waste Determination Testing (IDNR Handout)*
- *Industry Sector Notebooks (EPA Handout)*
- *Environmental Compliance Assistance Centers (EPA Handout)*
- *e-Manifest Fact Sheet (EPA Handout)*
- *RCRA Online A Quick Reference Guide (EPA Handout)*
- *Requirements for Used Oil Management Standards (EPA Handout)*
- *Emergency Response Program (EPA Handout)*
- *Commercial Motor Vehicle Transportation System Security & Safety Security Awareness (EPA Handout)*
- *Chemical Facility Anti-Terrorism Standards (Homeland Security Handout)*
- *Iowa Life/Changing Iowa Department of Economic Development – Iowa Environmental Guide for Business*

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

Liberty Anodizing is an aluminum anodizing facility. The facility is privately owned by Mr. Hormel. Liberty Anodizing was started in 1995 under previous ownership. Mr. Hormel stated that the facility is operates 10 hours per day, Monday-Thursday, with six staff. The facility is about 1200 square feet.

According to Mr. Hormel, the anodizing process consists of a wash dip, a sulfuric acid dip, and a dye dip. The wash dip uses an alkaline solution of sodium hydroxide (NaOH). The parts are rinsed, then dipped in the sulfuric acid solution. Some parts are dipped in the dye solution. Mr. Hormel stated that the dyes used are all organic and do not contain chromium or any heavy metals. Clean water flows through the wash and rinse tanks at a rate of about 50,000 gallons per month, and then into a plastic aboveground storage tank (AST) in the Wastewater Pretreatment Room. The contents of this tank are constantly monitored for pH and discharges directly into the sewer of the Publicly Owned Treatment Works (POTW). Mr. Hormel stated that sulfuric acid is stored in a plastic AST in the Wastewater Pretreatment Room and added to the rinse/wash wastewater to neutralize the pH. Sulfuric acid is used at a rate of about 250 gallons

every three months and is not considered a hazardous waste in this use. Mr. Hormel stated that they need to keep the pH within the range of 5.5 to 8.0 but strive to keep it as close to 7.0 as possible. I asked for a copy of the City Water Permit, but Mr. Hormel stated that they have a verbal agreement with the POTW, which was located only about 200 feet to their west.

4.2 RCRA Status

Liberty Anodizing was previously inspected for RCRA compliance on June 22, 2006. It was listed as a non-generator and no findings were reported. According to RCRAInfo, Liberty Anodizing had most recently notified as a non-generator of hazardous waste on June 28, 2006. I verified the facility address and the site contact information with Mr. Hormel and updated the EPA RCRA Notification Acknowledgement/Verification Report (see Attachment #6) to indicate the new primary contact. At the time of this inspection, I determined Liberty Anodizing to be a Very Small Quantity Generator (VSQG) of D002 characteristic hazardous waste with less than 100 kg, or 220 lbs, of non-acute hazardous waste generated per month. In addition, I determined Liberty Anodizing to be a generator of used oil.

4.3 Facility Waste Streams and Management

Mr. Hormel stated that the generation of the waste streams below are generally consistent from month to month. The following waste streams are managed by Liberty Anodizing:

Sodium Hydroxide - Sodium hydroxide sludge is generated at the bottom of the cleaning tanks during the anodizing process and is cleaned out and put into a 55-gallon drum in the Production Room (see Attachment #8 for the SDS). Mr. Hormel stated that they do a sludge cleanout about once every four to five months. Their most recent shipment of this waste was on January 16, 2023 (see Attachment #7 for the Manifests). This shipment was for two drums, or 110 gallons. The eManifest system listed this as 917 pounds. The next previous shipment was on August 15, 2022, of 55 gallons, or 459 lbs. A prior shipment was on April 11, 2022, of one 55-gallon drum at 459 pounds. Over the last year, Liberty Anodizing was generating between 115 to 183 pounds per month of this waste. The manifests list this as a D002 characteristic hazardous waste. The transport company used was Alport Transportation LLC, and the waste was transported to Tradebe Treatment and Recycling, LLC in East Chicago, Indiana. The management method code listed is H141 (the site receiving this waste stored/bulked and transferred the waste with no reclamation, recovery, destruction, treatment, or disposal at that site). During the visual inspection, I observed a blue poly 55-gallon drum of NaOH in the Production Room. The drum was about 1/3 full and appeared to be in good condition with no obvious damage or leaks (see Photo 2).

Used Oil - Liberty Anodizing generates used oil from periodic air compressor oil changes. Mr. Hormel stated that they use the air compressor to maintain a positive air pressure in the Production Room to reduce dust and air contaminants from contaminating their anodizing process (see Photo 1 for a view of the production area). He explained that the air compressor needs an oil change about every six months. An oil change generates about 1.5 gallons per change or about three gallons per year (see Photo 4 for the air compressor). Onsite the used oil is stored in a 55-gallon drum in the Warehouse. Mr. Hormel stated that in the past

Liberty Anodizing had provided the used oil to a friend to use in his heater, but base on the volume of used oil in the drum this would have been several years ago. During the visual inspection, I observed a 55-gallon black steel drum of used oil (see Photo 5). The drum was about ½ full and in good condition for no obvious damage or leaks. The drum was not labeled with the words “Used Oil”.

NOPF 1: Failure to label a used oil container with the words “Used Oil” as required in 40 CFR 279.22(c)(1)

Wastewater - Liberty Anodizing has an extensive pretreatment process for the wastewater. It is considered nonhazardous after pretreatment (see Photo 3). As noted above, sulfuric acid is added to the wash water to neutralize to a near 7.0 pH (range of 5.5 to 8.0) prior to emptying into the POTW drain.

General Trash and Recycling - Liberty Anodizing generates about ½ of a two cubic yard dumpster of general trash every two weeks and one recycle bin on wheels of recyclable cardboard and miscellaneous recyclables from operations. The trash and recyclable are serviced by the City of West Liberty. During the visual inspection, I observed a two-cubic yard dumpster to be about 1/10 full (see Photo 6).

4.4 Other Areas Reviewed

Outside Facility Perimeter - I conducted a limited inspection of the outside perimeter of the facility and observed no hazardous waste storage tanks and containers except as noted above. See the aerial and map views and facility diagram in Attachment #1.

5.0 SUMMARY OF FINDINGS

NOPF 1: Failure to label a used oil container with the words “Used Oil” as required in 40 CFR 279.22(c)(1)

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

MARK HOLCOMB
(Affiliate)

Digitally signed by MARK
HOLCOMB (Affiliate)
Date: 2023.04.21 17:10:56
-05'00'

Mark Holcomb
Civil Investigator, SEE

AMBER
WHISNANT

Digitally signed by AMBER
WHISNANT
Date: 2023.05.05 22:33:07 -05'00'

Amber Whisnant
RCRA Section Chief, ECAD/Chemical Branch

Attachments:

- 1) Facility Aerial, and Map Views (2 pages)
- 2) Photo Log (6 photos and 3 pages)
- 3) Receipt for Documents (1 page)
- 4) Confidentiality Notice (1 page)
- 5) NOPF (1 page)
- 6) EPA RCRA Notification Acknowledgement/Verification Report (1 page)
- 7) Uniform Hazardous Waste Manifests (3 pages)
- 8) SDS - Sodium Hydroxide (1 page)