

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

Iowa Contract Fabricators Inc.

12150 Addison Ave
Riceville, IA 50466
(507) 374-8744

EPA ID Number: IA0000990762

On

February 23, 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 Iowa Contract Fabricators Inc. (ICF) in Riceville, Iowa on February 23, 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

Iowa Contract Fabricators Inc.:

Mary Bierbrodt, Safety & Quality Supervisor

Pam Klobassa, Purchasing Agent

Jim Irvin, Plant Manger

Matthew Gregory, Senior Environmental Engineer

EPA Representative, ERG:
Janosh Wolters, Energy Engineer

3.0 INSPECTION PRECEDURES

After arriving unannounced at ICF at approximately 08:45, 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, Pam Klobassa. 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. Ms. Bierbrodt then greeted me at the facility entrance and led me to her office to begin the opening conference at approximately 09:00. I initiated the opening conference with Ms. Bierbrodt. Ms. Bierbrodt informed me that Mr. Gregory, the facility's corporate Environmental Engineer would participate for the entirety of the inspection except for the visual inspection via the office telephone. I then continued with the opening conference with Ms. Bierbrodt and Mr. Gregory present as ICF representatives. I presented Ms. Bierbrodt 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 Ms. Bierbrodt with a copy of the *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections* and reviewed ICF's confidentiality rights. I informed Ms. Bierbrodt that I would provide a *Confidentiality Notice* at the end of this inspection. At the conclusion of the opening conference, the facility's Plant Manager, Mr. Irvin joined us. Mr. Irvin stated he would be present for the duration of the 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. Bierbrodt 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. Bierbrodt 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 four 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. ICF uses one nonhazardous parts washer in the maintenance area. 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.

Ten 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. Bierbrodt and Mr. Irvin with a *Confidentiality Notice*, and *Receipt for*

Documents and Samples which Mr. Irvin signed as acknowledgement of receipt (see Attachments 5 and 6, respectively). No confidentiality claims were made by ICF.

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

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)

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

ICF began operating in 1992 and currently employs approximately 122 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 98,000 square feet. ICF's operations consist of manufacturing tailgates for refuse trucks. The primary raw materials used are steel, weld wire, shot blast, paint, and solvents. The major manufacturing or processing operations that generate waste streams include metal cutting, grinding, welding, painting and assembling tailgates for refuse trucks. The following waste streams are produced: waste paint related material, hazardous rags/personal protective equipment (PPE), aerosol can residuals, paint booth filters, parts washer solutions, shot blast media, 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 7), ICF notified as a federal Small Quantity Generator (SQG) of D001, D035, F003 and F005

hazardous wastes. I asked Ms. Bierbrodt 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. Ms. Bierbrodt stated the information on the form was accurate to the best of her knowledge. Ms. Bierbrodt stated that ownership has not changed, and Oshkosh Corporation owns McNeilus Truck and Manufacturing Inc., which uses the name Iowa Contract Fabricators. Ms. Bierbrodt stated the company uses ICF's name because it is a well-established brand name, and it was not desired to make the name change. There has not been a change in ownership since the last RCRA CEI on site. After reviewing the records and walking through the facility, it appears that the facility is operating as a federal SQG of D001, D035, F003, and F005 hazardous wastes, a generator of used oil, and a small quantity handler (SQH) of universal waste. ICF generates approximately 1,600 pounds of hazardous waste monthly. based on a review of facility records, a visual inspection of process and waste management areas, and interviewing personnel. In addition, the facility manages Hazardous Secondary Material (HSM) which is sent off-site for reclamation.

ICF was previously inspected by an EPA contractor on June 21, 2016. The inspection led to a NOPF. The findings included a failure to label SAA containers with the words "hazardous waste" and failure to keep SAA containers closed. ICF responded by correcting issues from the previous inspection and no enforcement actions were taken. I did not note any issues or findings during my inspection and therefore, no repeat findings were observed.

4.3 Facility Waste Streams and Management

A Waste Stream and Waste Handling Table for ICF 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	Spent Flush Solvent (HSM)	Flushing paint lines	Exempted Waste (based on process knowledge and knowledge of the product) (exemption for reclamation per 40 CFR 261.4(a)(24))	Four to eight 55-gallon containers every week	55-gallon containers	Hydrite Chemical (IAT200010593) in Waterloo, IA to Chemical (WID000808824) in Cottage Grove, WI for reclamation (HSM reclamation agreement included in Attachment 8)
2	Hazardous Waste Rags / PPE (Waste Profile included in Attachment 9)	Wiping solvents, PPE, absorbent pads, used paint buckets/cups	D001, D035, F003, F005 (based on process knowledge and knowledge of the product)	800 pounds per month	55-gallon container in SAA #1 before transferred to CAA	Heritage Transport LLC in Indianapolis, IN (IND058484114) to Rineco in Benton, AR (ARD981057870) for fuel blending
3	Waste Paint Related Material (Waste Profile included in Attachment 10)	Waste paint and solvent used from cleaning 1-gallon paint containers	D001, D035, F003, F005 (based on process knowledge and knowledge of the product)	One to two 55-gallon containers per month	55-gallon container in SAA #4 before transferred to CAA	Heritage Transport LLC in Indianapolis, IN (IND058484114) to Rineco in Benton, AR (ARD981057870) for fuel blending
4	Aerosol Can Residuals (Waste Profile included in Attachment 11)	Puncturing RCRA empty aerosol cans	D001 (based on process knowledge and knowledge of the product)	Less than one inch per year	55-gallon container in SAA#4 before transferred to CAA	Heritage Transport LLC in Indianapolis, IN (IND058484114) to Rineco in Benton, AR (ARD981057870) for fuel blending

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
5	Paint Booth Filters (Nonhazardous Industrial Solid Waste Re-Certification included in Attachment 12)	Painting operations	Nonhazardous (based on process knowledge and knowledge of the product)	One 5-yard container per week	5-yard container	Transported to McNeilus Truck & Manufacturing in Dodge Center, MN location and sent off-site to County of Olmsted Department of Environmental Resources in Rochester, MN for energy recovery
6	Shot Blast Media/Dust (Safety Data Sheet (SDS) included in Attachment 13)	Steel beads shot at manufactured steel parts to prepare steel for painting operations	Nonhazardous (based on process knowledge and knowledge of the product)	One 55-gallon container per week	55-gallon container	McNeilus Steel Recycling in Dodge Center, MN (MNS000304984) for recycling
7	Nonhazardous Parts Washer (SDS included in Attachment 14)	Cleaning oil and greases off small maintenance tools	Nonhazardous (based on process knowledge and knowledge of the product)	15 gallons serviced every six months	In parts washer	Safety Kleen in Des Moines, IA (IAD981718000) for recycling (Invoice included in Attachment 15)
8	Used Oil	Maintenance of facility machinery and equipment	Nonhazardous/Excluded (managed as used oil per 40 CFR 279)	359 gallons per year	55gallon containers	Safety Kleen in Des Moines, IA (IAD981718000) for recycling (Invoice included in Attachment 16)

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
9	Used Oil Filters	Facility maintenance	Nonhazardous/Excluded (managed as used oil per 40 CFR 279)	Two 55-gallon containers per year	55-gallon containers	Safety Kleen in Des Moines, IA (IAD981718000) for recycling
10	Scrap Metal	Facility operations	Nonhazardous (based on process knowledge and product)	500,000 pounds per month	40-yard container	McNeilus Steel Recycling in Dodge Center, MN (MNS000304984) for recycling
11	Universal Waste Lamps	Facility maintenance	Nonhazardous/Excluded (managed as universal waste)	One 4-foot container per year	4-foot container	The Retrofit Companies in Sherwood, OR (ORQ000026577) for recycling (Invoice included in Attachment 17)
12	Universal Waste Batteries	Facility maintenance	Nonhazardous/Excluded (managed as universal waste)	Five 5-gallon containers per year	5-gallon container	The Retrofit Companies in Sherwood, OR (ORQ000026577) for recycling
13	General Trash	Facility operations	Nonhazardous (based on process knowledge and product)	40-yard container picked up weekly	40-yard containers	Hawk Eye Sanitation in Cresco, IA to Floyd Mitchell Chickasaw Solid in Mitchell County, IA for landfill

4.4 Less-Than-180-Day Hazardous Waste Accumulation Area

ICF has one less than 180-day CAA on site, which is located outside on the east side of the facility in an equipment laydown area (see “CAA” on the facility layout Attachment 1). The CAA is similar in construction to a steel shipping container except with four compartments, each with an access door. The exterior of the container had “Hazardous Materials Stored Inside”, and “No Smoking” signs affixed. Inside the CAA, I observed HSM, hazardous waste, and reclaimed solvent being stored (see Attachment 3, Photos 2-3). There was a total of six 55-gallon HSM MEK flush solvent being accumulated in the CAA. The six 55-gallon containers were closed, in good condition, were labeled as “Hazardous Waste”, labeled with an indication of the nature of the hazard, and had accumulation start dates. The facility was required by the vendor to manage the HSM as a hazardous waste prior to transportation off site due to the transporter travelling out of the state of Iowa after pickup. In addition, two 55-gallon containers of hazardous waste rags/PPE were observed in the CAA in the back left corner of this photograph. This photograph does not represent how the CAA would be inspected. The flammable storage cabinet is able to open on three sides to allow for CAA inspections to visually inspect and read all container labels. During the visual inspection, I observed all labels facing a direction that could be visible to personnel conducting CAA inspections. All hazardous waste containers were closed, in good condition, labeled as “Hazardous Waste”, and labeled with an indication of the nature of the hazard. The earliest accumulation start date on a hazardous waste container in the CAA was February 14, 2022. February 14, 2022 is within 90 days from the date of the inspection.

I observed adequate aisle space to allow for container inspections and access in the event of a spill. The floor of the CAA has an internal secondary contaminated area. I observed spill control equipment, and related safety equipment in close proximity to the CAA. Operators handling hazardous waste are trained to use their two-way radio system in case of emergencies. Ms. Bierbrodt and Mr. Irvin explained this area is restricted and only staff actively managing hazardous waste who have been adequately trained and complete annual refresher training have access to the CAA. I asked Ms. Bierbrodt if the facility inspected the CAA. Ms. Bierbrodt stated the facility inspected the CAA at least weekly and had weekly inspection logs.

During records review, Ms. Bierbrodt provided inspection logs for the CAA. I reviewed the logs, and it appeared the facility was adequately performing weekly inspections of the CAA. An example of a CAA log is provided in Attachment 18.

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

4.5 Satellite Accumulation Areas

I observed four 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 Booth	Hazardous Waste Rags/PPE	20 gallons	55-gallon drum
2	Paint Booth HSM	HSM (MEK Paint Line Flush)	10 gallons	55-gallon drum
3	Automated Paint Booth HSM	HSM (MEK Paint Line Flush)	25 gallons	55-gallon drum
4	Waste Paint Related Material/Aerosol Can Puncture Unit	Waste Paint Related Material and Aerosol Can Residuals	5 gallons	55-gallon drum

During the visual inspection, I observed four SAAs. Mr. Gregory explained the HSM containers observed in SAA #2 and SAA #3 are only labeled as “Hazardous Waste” because of how the transporter requires this material to be labeled prior to off-site shipment (see Attachment 3, Photo 7-8). In addition to the words “Hazardous Waste” being labeled on the two 55-gallon containers of HSM being accumulated in SAA #2 and SAA #3, containers accumulating HSM are labeled “Hazardous Secondary Material” on green facility labels. See section 4.6 of this report for more information on how HSM is managed on and off site. During the visual inspection of SAA #4, I asked Ms. Bierbrodt why the facility did not manage the waste in SAA #4 as HSM. Ms. Bierbrodt explained that SAA #4 is used to accumulate MEK that is used to rinse out small 1-gallon paint containers, outside of paint guns, small paint trays, and is also used as the facility aerosol can puncture unit. Ms. Bierbrodt explained the facility primarily uses aerosol can for touch up operations and does not generate many aerosol cans as waste. Therefore, the puncture device is only added when the facility needs to puncture an aerosol can. Ms. Bierbrodt explained if an aerosol can were to break, the facility would puncture the can immediately. Ms. Bierbrodt stated the agreement with Hydrite is only to reclaim the MEK solvent solution captured from flushing paint lines. The hazardous waste accumulation containers observed in the SAAs were in good condition, closed, labeled with the indication of the nature of the hazard, and labeled with the words “Hazardous Waste” (see Attachment 3, Photo 6).

I reviewed the management of the SAAs, and no issues or findings were noted.

4.6 Hazardous Secondary Material

Prior to the visual inspection, Mr. Gregory explained the facility had a contractual agreement with Hydrite Chemical to reclaim the facility’s MEK solvent solution used for flushing paint lines. I asked Mr. Gregory if ICF notified EPA of their HSM activities. Mr. Gregory stated the facility has notified EPA and continues to renotify bi-annually as a best management practice. The facility’s re-notifications for 2019 and 2021 are provided in Attachment 8. I asked Mr.

Gregory what type of solvent is being reclaimed. Mr. Gregory stated the facility had an agreement with Hydrite Chemical to use solvent with unique specifications that have agreed upon maximum and minimum amounts of specific constituents. Ms. Bierbrodt provided the spec sheet during records review, which is provided in Attachment 19. Mr. Gregory explained the specs could change slightly with each batch of reclaimed solvent, but the specs should fall in within the agreement. An example of a recent batch of solvent solution received from Hydrite Chemical is provided in Attachment 20 as an example. Mr. Gregory explained with each batch received, a spec sheet is provided. Mr. Gregory explained that because Hydrite Chemical is located in Cottage Grove, MN, they require ICF to have the solvent to be reclaimed labeled as a hazardous waste when being shipped off site. Mr. Gregory stated this was the only reason the facility has labeled the 55-gallon containers I observed during the visual inspection to have hazardous waste labels attached. In addition, HSM containers are shipped off site on a hazardous waste manifest as required by Hydrite Chemical. An example of a manifest for a shipment of HSM is provided in Attachment 21. I thoroughly reviewed the requirements set forth in 40 CFR 261.4(a)(24) and documented the facility's compliance in the *EPA Inspection Checklist* (see Attachment 4).

4.7 Paint Booths

During the visual inspection, I observed two paint booths. One paint booth was fully automated, and the other paint booth used manual spray paint guns. In the manual paint booth, the paint guns are hooked up directly to paint containers on the outside of the paint booth during painting operations (see Attachment 3, Photo 5). After each painting operation, paint lines are hooked up directly to 55-gallon containers of an MEK solvent solution and flushed into a 5-gallon container. The paint operators then bring the 5-gallon container to the 55-gallon container observed in SAA #2. The automated paint lines are flushed into a 5-gallon container and an operator empties the 5-gallon container into the 55-gallon container located in SAA #3. Prior to painting operations, the facility conducts blasting operations which is further explained in Section 4.8 of this report.

In addition, the facility generates paint booth filters waste. Ms. Bierbrodt explained the facility has a separate 5-yard container that is used to accumulate paint booth filters. The paint booth filters are then transported to the McNeilus Truck & Manufacturing in Dodge Center, MN which is under control of the operator and is then shipped off site to the County of Olmsted Department of Environmental Resources in Rochester, MN for energy recovery. ICF has determined that the paint booth filters are nonhazardous, and this waste determination is recertified by analytical testing. The most recent sampling event took place the week of February 14, 2022, and samples are still being analyzed. During records review, Ms. Bierbrodt provided the nonhazardous industrial solid waste re-certification form as shown in Attachment 12.

I did not observe or note any issues or findings with paint booth operations.

4.8 Shot Blast Media

Prior to painting operations, manufactured steel is sent through shot blasting operations to better prepare the steel surface for painting. The facility uses a steel bead which is pneumatically shot onto manufactured pieces of steel. This process generates steel bead shot blast media/dust waste. Ms. Bierbrodt stated the facility generates one 55-gallon container per week. The waste is considered a nonhazardous waste and is shipped off-site for recycling. The SDS for the blast media used is provided in Attachment 13. I did not note any issues or findings regarding shot blasting operations on site.

4.9 Parts Washers

At the time of the inspection, the facility was operating one parts washer located in the maintenance area of the facility and is labeled “Parts Washer” on the facility layout (see Attachment 1). Mr. Irvin explained the parts washer is used by maintenance staff to clean greases and oils off of small tools. Ms. Bierbrodt stated the facility parts washer solution is a nonhazardous parts washer solution and is serviced once every six months by Safety Kleen. The parts washer holds approximately 15 gallons of solvent solution (see Attachment 3, Photo 10). The SDS for the parts washer is provided in Attachment 14. An invoice for how servicing is documented is provided in Attachment 15. I did not note any issues or findings with any of the parts washers.

4.10 Universal Waste Accumulation Area

ICF manages universal waste next to the maintenance area and is labeled “Universal Waste” on the facility layout (see Attachment 1). I observed four 5-gallon containers of universal waste batteries (see Attachment 3, Photo 9). The containers were closed and in good condition. All four containers were labeled “Universal Waste Batteries”. The earliest accumulation start observed was “11/7/2021”. At the time of the inspection, the facility was not accumulating universal waste lamps on site. Ms. Bierbrodt stated it is rare for the facility to generate universal waste lamps because the facility is almost 100 percent converted over to light emitting diode (LED) lights. I reviewed the management of all universal waste storage areas throughout the facility and no issues or findings were noted.

4.11 Used Oil

I visually observed two used oil storage areas on site. Used Oil is generated from facility maintenance of equipment. Each used oil storage area contained one 50-gallon portable tank used to collect used oil (see Attachment 4, Photo 4). Both portable tanks were closed, in good condition, and labeled as “Used Oil”. An invoice is provided for off-site shipments as an example in Attachment 16.

I did not note any issues or findings at the used oil storage area.

4.12 Other Regulatory Requirements

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

Contingency Planning Requirements - The contingency plan is not required for SQG's. However, based on the facility's HSM activities, Mr. Gregory drafted a contingency plan (see Attachment 22). The contingency plan was on file electronically and was reviewed while on site. Mr. Gregory stated the contingency plan was drafted to ensure the facility met the requirements set forth in 40 CFR 261.411 for HSM generators accumulating less than 6,000 kilograms. I thoroughly reviewed the requirements set forth in 40 CFR 261.411 and documented the facility's compliance in the *EPA Inspection Checklist* (see Attachment 4).

Preparedness, Prevention, and Emergency Requirements - Safety and emergency equipment were present and in satisfactory condition in areas throughout the facility, including in close proximity to the 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. Based on the visual inspection and discussions with employees, it appeared the employees are familiar with waste handling and emergency procedures. The employees appeared to be aware of RCRA regulations and were knowledgeable of waste management and handling. Mr. Gregory explained as a best management practice, the facility refreshes hazardous waste training annually. An example of a training attendance sheet is provided in Attachment 23.

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

Manifest and Land Disposal Restriction (LDR) Requirements – ICF maintained records of manifests on site at the time of inspection dating back three years. A total of 130 HSM manifests were generated in the last three years and approximately 50 of these manifests were reviewed on site. 23 hazardous waste manifests have been generated over the last three years and I reviewed all 23 hazardous waste manifests during records review on site. An example of hazardous waste manifest is provided in Attachment 24. I reviewed all other manifest and LDR requirements and no issues or findings were noted.

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

Janosh
Wolters

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Janosh Wolters
Energy Engineer
Date: April 2, 2022

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

Attachments:

1. Facility Layout (1 page)
2. Iowa Contract Fabricators Inc Photolog (1 page)
3. Iowa Contract Fabricators Inc Photos (10 photos/11 pages)
4. EPA Inspection Checklist (43 pages)
5. Confidentiality Notice (1 page)
6. Receipt for Documents and Samples (1 page)
7. Hazardous Waste Site Info Verification Report for Inspector (1 page)
8. Hazardous Waste Activity Notification (11 pages)
9. Hazardous Waste Rags Waste Profile (3 pages)
10. Waste Paint Related Material Waste Profile (5 pages)
11. Aerosol Can Residuals Waste Profile (3 pages)
12. Paint Booth Filters Non-hazardous Industrial Solid Waste Renotification (1 page)
13. Shot Blast SDS (7 pages)
14. Parts Washer SDS (5 page)
15. Parts Washer Invoice (1 page)
16. Used Oil Invoice (1 page)
17. Universal Waste Invoice (1 page)
18. CAA Log (1 page)
19. Hydrite Solvent Agreement (1 page)
20. Solvent Spec Sheet (4 pages)
21. HSM Manifest (2 pages)
22. Contingency Plan (5 pages)
23. Training Records (2 pages)
24. Hazardous Waste Manifest (1 page)