

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

ROSENBOOM MACHINE AND TOOL

1530 Western Avenue
Sheldon, Iowa 51201
(712) 324-4854

EPA ID Number: IAD072900483

On

August 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 Rosenboom Machine and Tool, located in Sheldon, Iowa, on August 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

Rosenboom Machine:

- Kevin West, Environmental Health and Safety Coordinator (EHS) (8 years with company)
- Linda Sandberg, Human Resource Director (2 years with company)
- Jeff Lalumendre, Director of Manufacturing (5 years with company)
- Joel Korthals, Manufacturing Manager (28 years with company)
- Jed Vanderpol, Painter (18 years with company)
- Andrew Moline, Director of Metal Finishing (8 years with company)
- Dustin Quinn, Manager of Metal Finishing (5 years with company)

EPA:

- Mark Holcomb, Civil Investigator/Inspector (SEE)

3.0 INSPECTION PROCEDURES

On August 8, 2023, I arrived unannounced at the facility's main entrance at about 0930 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 stopped at the front desk. I introduced myself and asked for the EHS Manager. I was introduced to Mr. Kevin West, the EHS Manager. Mr. West escorted me to the office/workroom area. Mr. West told me the only items of personal protective equipment required for our visual inspection at this facility were protective boots and eye protection. Mr. West stated that he was the primary contact for hazardous waste at this facility and had been with the company in this role for about eight years.

At the opening conference, I presented my EPA ID and credentials to Mr. West. I next explained the purpose and procedures of the inspection. I then presented Mr. West 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. He was made aware of his confidentiality rights, and I 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. West acted as the official facility representative during the inspection.

The 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 and documents.

I conducted a visual inspection of the following areas:

- Customer Show Room (see Photo 1 for a product overview)
- Maintenance Crib
- Tool Crib
- Maintenance Crib Storage
- Office Storage
- Paint Department
- Loading Dock
- Production 90-Day CAA (Central Accumulation Area)
- Metal Finishing 90-Day CAA
- Metal Finishing

See Attachment #1 for the aerial/map views and facility diagram. Document photocopies and photographs were collected as inspection documentation (see Attachments #1-12 and Photos 1-30). 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), manifests, invoices, contingency plan, and staff training. 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. West. I provided Mr. West 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. West.

I provided inspection and compliance assistance documents to Mr. West during the inspection, some as paper versions and some in electronic PDF via email post-inspection, 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*
- *How to Register for RCRAInfo Industry Application for Iowa Facilities*

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

Rosenboom Machine is a manufacturer of custom designed hydraulic cylinders used in the military, steel, agriculture, refuse, construction, fire department, and utility industries. They are also partners in the production of the hydraulic suspension system for the U.S. Department of Defense's new highly armored Joint Light Tactical Vehicle that is designed to partially replace the Humvee. The facility is privately owned by Rosenboom Machine. Mr. West stated that this

Rosenboom Machine facility has been in operation since 1976. The facility is about 266,000 square feet. Rosenboom Machine operates two sister facilities in Spirt Lake, Iowa, and Bowling Green, Ohio. The facility operates Monday–Saturday with two ten-hour shifts and 331 staff. Onsite EHS is coordinated by a full-time EHS manager based about one hour away at their Spirt Lake, Iowa facility. Mr. West stated that the only significant change since their last inspection about six years ago, was the addition of 30,000 square feet for a metal finishing and chrome plating department. Mr. West also stated that there had been no spills or activation of their contingency plan since the last inspection. See Attachment #1 for the facility aerial map views and facility diagram.

4.2 RCRA Status

Rosenboom Machine has been previously inspected for RCRA compliance as a small quantity generator on September 9, 2017. According to RCRAInfo, Rosenboom Machine had most recently notified as a Large Quantity Generator (LQG) on February 18, 2022. I verified the facility address and the site contact information with Mr. West and updated the EPA RCRA Notification Acknowledgement Verification Report (see Attachment #6) to indicate the primary contact’s phone number. At the time of this inspection, I determined Rosenboom Machine to be a LQG of D001, D002, D005, D007, D008, D035, D039, F003, F005, and F006 hazardous waste with more than 1000 kg, or 2200 lbs, of non-acute hazardous waste generated per month, a small quantity handler of universal waste batteries and lamps, and a generator of used oil.

4.3 Facility Waste Streams and Management

Mr. West stated that the following waste streams are managed by Rosenboom Machine:

Flammable Liquids - Methyl Ethyl Ketone (MEK)/Acetone, Still Bottoms - Rosenboom Machine generates waste paint, solvents, and still bottoms in their Paint Department during the manufacturing process. This waste had been determined to be hazardous with D001, D035, F003, and F005 waste codes based on process and product knowledge (see Attachment #7 for manifests). Mr. West estimates the annual generation of this waste to be about 7,000 pounds per year, or about 600 pounds per month. Mr. West stated that they previously tracked waste paint and related materials (flammable liquids) and the still bottoms as separate waste streams, but recently started tracking them together since they come from the same process. Onsite this waste is transferred to a 55-gallon satellite accumulation area (SAA) drum located inside of a flammable cabinet in the Paint Department (see Photos 14-16). Once the SAA drum is full a detailed computer-generated label with all of the required information (“Hazardous Waste,” nature of hazardous waste, and accumulation start date) is applied and then the drum is transferred to the Production 90-Day Central Accumulation Area (CAA). Mr. West stated that they are concerned about damaging and obscuring the label with the wet paint if they were to apply the label before filling. Mr. West stated that the transferring of wet paint/solvent to the SAA drum is done by staff wearing heavy gloves and protective suits. They also store the SAA drum inside of a closed flammable cabinet with “Flammable” labeling on the outside of the cabinet. The facility also operates a paint solvent still in the Paint Department. The still is located inside of a 10-foot by 10-foot by 10-foot mixing room (Mixing Room #3) with a steel 55-gallon drum collecting the still bottoms. The mixing room is protected by a CO₂ fire suppression

system. Jed Vanderpol, a painter with the company for 18 years, stated that it takes about ten days to fill the still bottoms 55-gallon SAA drum. When the drum is full it is labeled with a detailed computer printed label (see Photo 17) and transferred to the Production 90-Day CAA. The waste drums of waste paint, MEK, acetone and still bottoms are picked up and transported by Univar Solutions USA Inc. (Texas) and transported to Univar Solutions (Shakopee, Minnesota) for H141 processing (storage and transfer). See Attachment #7 page 7 for the manifest dated March 27, 2023, for 200 pounds.

During the visual inspection I observed a closed yellow flammable cabinet. The flammable cabinet was labeled with “Flammable,” “Flammable Liquid” and a sign stating “hazwaste label goes on lid.” Inside, the flammable cabinet contained a 1/3 full black steel drum with a closed funnel (note: Photo 16 was out of focus). The black steel drum appeared to be in good condition with no obvious damage or leaks. Mr. West showed me an example of the computer printed detailed label that he said is applied to the drum after filling and prior to transfer the Production 90-Day CAA (see Photo 17).

During the visual inspection of the Solvent Still area, I observed the still inside of Mixing Room #3 (see Photos 19-20). Since the still was operational and the room had limited access and a no electronics requirement, I elected to not enter the room and only observed through the window on the door. The black steel drum appeared to be in good condition with no obvious damage or leaks. I was not able to assess the volume of the drum. The drum did not appear to have any labeling, but I was not able to visualize the back side of the drum. Mr. West explained that the mixing room itself has limited access to authorized personnel only and the outside of the room has hazard and danger, flammable signs, along with no cellphones or electronics permitted signs. Mr. West explained that the facility feels that the detailed computer-generated label on the SAA drum could be damaged by the process during its accumulation phase and is also redundant since the room itself is labeled and has restricted access. *Post inspection, after additional review, I determined that the two SAA drums in the Paint Department were not marked with the words “Hazardous Waste” and were not marked with the indication of the nature of the hazard. On September 10, 2023, I contacted Mr. West via phone to inform him of NOPFs 6A and 6B.*

- **NOPF 6A: Failure to mark or label SAA containers of waste paint/solvent the words “Hazardous Waste” as required in 40 CFR 262.15(a)(5)(i) [NOPF added post inspection]**
- **NOPF 6B: Failure to label SAA containers of still bottoms with the nature of the hazard as required in 40 CFR 262.15(a)(5)(ii) [NOPF added post inspection]**

Parts Cleaner Solvent - Premium Gold Safety Kleen - Rosenboom Machine generates about 30 gallons every six months of spent parts cleaner solvent from the one parts washer located in the Maintenance Crib area (see Photo 2) and used in maintenance operations. Mr. West stated that the facility considers the spent parts cleaner solvent to be D039 (tetrachloroethylene) hazardous waste (based on process knowledge). The parts washer is serviced onsite, and the spent solvent is transported by Safety Kleen (Texas) to Safety Kleen Systems (Sioux Falls, South Dakota) for H141 processing (storage and transfer). No spent parts washer solvent is stored onsite. See Attachment #7 page 5 for the manifest dated May 10, 2023, for seven gallons or 58 pounds.

Chrome Exposed Debris - Rosenboom Machine generates about 270 pounds per month of the chrome exposed debris during their metal finishing process. Rosenboom Machine determined the chrome exposed debris to be D007 hazardous waste (based on process knowledge). The hazardous waste is stored in the Metal Finishing 90-Day CAA and transported off-site by Univar (Minnesota) to Univar Solutions (Shakopee, Minnesota) for processing (no management code listed on the manifest). See Attachment #7 page 6 for the manifest dated July 17, 2023, for 270 pounds.

Mop Water - Rosenboom Machine generates about 3,000 pounds per month of mop water generated from chrome exposed cleanup around the finishing machines. Rosenboom Machine determined the mop water to be D007 hazardous waste (based on process knowledge). Onsite it is stored in 250-gallon totes in the Metal Finishing 90-Day CAA and transported off-site by Univar (Minnesota) to Univar Solutions (Shakopee, Minnesota) for processing (no management code was listed on the manifest). See Attachment #7 page 6 for the manifest dated July 17, 2023, for two totes at 3,950 pounds and see Attachment #7 page 3 for a shipment of two totes at 5,080 pounds shipped by Univar Solutions on April 24, 2023, for H141 management (storage and transfer).

Chrome Plating Solution - Rosenboom Machine generates about 8,500 pounds per year of chrome plating solution during their chrome plating operations. The facility pumps out the chrome plating tank annually. Rosenboom Machine determined the chrome plating solution to be D007, D002, and D008 hazardous waste (based on process knowledge). Onsite it is stored in 250-gallon totes in the Metal Finishing 90-Day CAA and transported off-site by Univar (Minnesota) to Univar Solutions (Shakopee, Minnesota) for processing (no management code listed on the manifest). See Attachment #7 page 6 for the manifest dated July 17, 2023, for three totes at 8580 pounds for H141 management (storage and transfer).

Paint Booth Floor Paper - Rosenboom Machine generates about 200 pounds per month of paint booth floor paper (see Photo 11) generated from painting operations. Based on Toxicity Characteristic Leaching Procedure (TCLP) analytical testing (see Attachment #8 for TCLP Analytical Report), the facility determined this waste stream to be non-hazardous. Univar Solutions (Shakopee, Minnesota) disposes of the spent paint booth floor paper. The waste is collected in 55-gallon steel drums in the SAA of the Paint Department and transferred to the Production 90-Day CAA when full. During the visual inspection, I observed one 55-gallon drum, about ½ full of waste paint booth floor paper, in the SAA pending transfer to the CAA (see Photos 11 & 13). This drum was in good condition, closed, and labeled as “non-RCRA” waste.

Disposable Paper Wipes - Rosenboom Machine generates about 25 pounds per month of the paper disposable wipes. Based on TCLP analytical testing (see Attachment #8 for TCLP Analytical Report), the facility considers this waste stream to be non-hazardous. Mr. West stated that they typically do not use solvent with the wipes, just oil. This waste is collected in 55-gallon steel drums in the SAA of the Paint Department and transferred to the Production CAA when full. During the visual inspection, I observed one 55-gallon drum, about 3/4 full, in the SAA (see Photos 11-12). The rags appeared dry with no obvious free liquids. The drum was labeled with “Excluded Solvent Contaminated Wipes, Non-RCRA Material” with an accumulation start date of July 26, 2023. This waste is transported off-site by Univar Solutions for disposal/processing.

Five Stage Washer Sludge - Rosenboom Machine generates about 300 pounds per month of this waste from the cleaning of metal parts prior to painting and is changed out monthly. The facility has determined this waste to be non-hazardous (based on process knowledge) and stores it in 55-gallon drums in the Paint Department area that are transferred to the Production 90-Day CAA for transport off-site by Univar for disposal (see Photo 27).

Cobalt Exposed Debris - Rosenboom Machine generates about 75 pounds every six months of this waste generated during the Cobalt plating process in the Metal Finishing area. Mr. West stated that this is a beta testing process. The facility has determined this waste to be D002 hazardous waste (based on process knowledge). The manifest (see Attachment #7 page 4) indicates that it also contains phosphoric and sulfuric acids. Onsite it is stored in 55-gallon drums in the Metal Finishing 90-Day CAA. The June 26, 2023, manifest indicated that one container of 75 pounds was shipped by Univar Solutions (Texas) to Univar Solutions (Shakopee, Minnesota) for H141 management (storage and transfer).

HEPA Filters with Chrome - Rosenboom Machine generates about 400 pounds annually of this waste during the metal finishing process. The facility has determined this waste to be D007 hazardous waste (based on process knowledge). This waste is listed on the June 26, 2023, manifest (see Attachment #7, page 4), but did not appear to have been shipped on that date. Onsite it is stored in drums in the Metal Finishing 90-Day CAA. Annually, this waste is shipped by Univar Solutions (Texas) to Univar Solutions (Shakopee, Minnesota) for H141 management (storage and transfer).

Colbalt Activation Tank Waste - Rosenboom Machine generates about 8,000 pounds per year of this waste from their metal finishing process. Mr. West stated that it is generated roughly annually, based on titration testing. The facility has determined this waste to be D002 hazardous waste (based on process knowledge). Onsite it is stored in drums in the Metal Finishing 90-Day CAA. The April 24, 2023, manifest (See Attachment #7, page 3) indicated that four totes of 8,320 pounds was shipped by Univar Solutions (Texas) to Univar Solutions (Shakopee, Minnesota) for H141 management (storage and transfer).

Sulfuric Acid T3 Titration Waste – Rosenboom Machine generates about 60 pounds per year of this waste from testing in the facility’s Metal Finishing Quality Assurance (QA) lab. The facility has determined this waste to be D002 hazardous waste (based on process knowledge). The sulfuric acid from the T3 testing process is collected in three-gallon plastic SAA containers. Once full the container is transferred to the Metal Finishing 90-Day CAA for transport. The March 13, 2023, manifest (see Attachment #7, page 1) indicated that one container of 60 pounds was shipped by Univar Solutions (Texas) to Tradebe Treatment and Recycling LLC (East Chicago, Indiana) for H141 management (storage and transfer). During the visual inspection, I observed one white plastic three-gallon container in the Metal Finishing area. The container had a closed top and appeared to be in good condition with no obvious damage or leaks. The container had a label that indicated “Hazardous Waste,” nature of the hazard (“T3 Titration Waste – Toxic”), and an accumulation start date of July 6, 2023 (see Photo 30).

Chrome Tank Filters – Rosenboom Machine generates about 290 pounds every four months of tank filters used in the metal finishing process. The facility has determined this waste to be D002

and D007 hazardous waste (based on process knowledge). Onsite these are stored in drums in the Metal Finishing 90-Day CAA and transported off-site by Univar Solutions.

Used Oil – Rosenboom Machine generates about 400 gallons of used oil and oily water every three months, or 1,600 gallons per year, mostly from hydraulic equipment preventive maintenance. The facility has determined the used oil and oily water to be non-hazardous. During the visual inspection, I observed the clean and dirty used oil being collected into tanks and the oily water being separated to collect the used oil and the oily water (see Photos 22 & 23). Used oil is stored in several above ground 400-gallon tanks that are marked with “Used Oil.” Lube Tech transports the used oil quarterly for recycling. Safety Kleen transports the totes of oily water for processing. All containers are in good condition and free of damage or obvious leaks. See Photos 24, 26, and 28.

Used Oil Filters – Rosenboom Machine generates about 150 pounds per quarter of drained used oil filters. The filters were generated from preventive maintenance of the hydraulic equipment. The used oil filters are shipped out as scrap metal for recycling. During the visual inspection, I observed a full 55-gall steel drum of used oil filters in the Production 90-Day CAA labeled “Used Oil Filters” (see Photo 28).

Spent Aerosol Cans – Rosenboom Machine generates less than 100 pounds of RCRA-empty (punctured) spent aerosol cans and collects them in a 55-gallon container in the Paint Department area (see Photo 11). The facility had determined this waste to be non-hazardous (based on process knowledge). The empty cans are transferred to the scrap metal roll-off for recycling. During the visual inspection, I observed a 55-gallon drum of spent aerosol cans. The drum was in good condition and labeled with the words “Empty Spray Cans.”

Scrap Metal – Rosenboom Machine generates about 1,500 pounds of scrap metal per month. The scrap metal is processed for recycling by Shine Brothers Corp (Spenser, Iowa). During the visual inspection, I observed the scrap metal stored in a 40 square-yard roll-off in the loading dock, about 2/3 full. The scrap metal appears to be mostly metal filings from metal processing (see Photo 21).

Universal Waste-Lamps – Rosenboom Machine generates about 100 spent florescent lamps per year from relamping activities. The spent lamps are stored in a protective cardboard tube in the Maintenance Crib. Mr. Joel Korthals, Maintenance Manager, was present to the explain the process. He stated that the spent lamps were treated as Universal Waste and are sent to A-Tech (Des Moines, Iowa) for recycling. During the visual inspection, I observed one lamp tube full of about 100 green tipped six-foot universal waste-lamps. The top of the tube was closed, and all the lamps appeared to be in good condition. The container was labeled with “Universal Waste” and an accumulation date of August 29, 2022 (see Photos 7-9). However, the container was not marked labeled with the words “Universal Waste-Lamp(s),” or “Waste Lamp(s),” or “Used Lamp(s).” Mr. Korthals corrected the labeling at the time of the inspection (see Photo 9).

- **NOPF 2: Failure to label waste lamps as “Universal Waste Lamps,” “Waste Lamps,” or Used Lamps” as required in 40 CFR 273.14(e)**

Universal Waste-Batteries - Rosenboom Machine generates about three containers of universal waste batteries per year from the service of various equipment. The batteries are collected in two plastic two-gallon containers in the Maintenance Crib area, one container for alkaline and one for rechargeable lithium batteries. The spent rechargeable lithium batteries were treated as Universal Waste and are sent to A-Tech (Des Moines, Iowa) for recycling. During the visual inspection, I observed two containers storing a mixture of alkaline and rechargeable lithium batteries. Neither container had universal waste labeling (see Photos 4-6). Mr. West stated that that both containers of waste batteries had accumulating since December 2022.

- **NOPF 1A: Failure to label waste batteries as “Universal Waste Batteries,” “Waste Batteries,” or “Used Batteries” as required in 40 CFR 273.14(a)**

Spent Lead-Acid Batteries - Rosenboom Machine generates about two lead-acid batteries per year from fork-lift maintenance. The batteries are treated under 40 CFR 266 Subpart G and sent to Newtecc Recycling (Spenser, Iowa) for recycling. At the time of the inspection, I did not observe any spent lead-acid batteries onsite.

Carbide - Rosenboom Machine generates about ½ to one 55-gallon drum per year of carbide from machining operations. This waste is mostly specialized tools with carbide tips for working with metals. Mr. West stated that it typically takes a year or two to accumulate a full drum. Mr. West stated that the drums of waste carbide are sent back to the tool vendor for recycling. The waste is determined to be non-hazardous (based on product and process knowledge). During the visual inspection, I observed two 55-gallon black drums in the Tool Crib, both about ½ full, with a “Carbide” label (see Photo 3).

Electronic Waste - Rosenboom Machine generates about ¾ of a cardboard box per year of electronic waste from plant and business operations. The waste is determined to be non-hazardous (based on process knowledge). Onsite it is stored in a cardboard box in the Office Storage room (see Photo 10). Periodically the waste is sent to A-Tech (Des Moines, Iowa) for recycling.

Wastewater - Rosenboom Machine generates about 6,000-10,000 gallons of wastewater per day. The wastewater daily outflow goes into a 500-gallon tank, then into an oil/water separator (the oil separated out go to the used-oil waste stream) and then to the drains and Publicly Owned Treatment Works system. The wastewater is managed under a City of Sheldon Wastewater Permit (see Attachment #9) and is sampled tested by the City of Sheldon monthly. During the visual inspection, I observed the wastewater operation. Photo 22 on the Loading Dock shows the initial dirty oil and clean oil separation. Photo 23 shows an overview of the wastewater system. Photo 25 shows stored coolant that is reused in the plant.

General Trash - Rosenboom Machine generates non-hazardous general trash from maintenance and business operations. The facility estimates it generates about one 40-cubic-yard roll-off once a week. The waste trash is transported by DeKruif Disposal (Spencer, Iowa) and transported to Northwest Iowa Landfill (Sheldon, Iowa). During the visual inspection I observed a full roll-off on the Loading Dock (see Photo 21).

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 in Attachment #1.

Central Accumulation Areas (90-Day CAA) - There were two CAAs in this facility - one in the Production Area called the Production 90-Day CAA, and one in the Metal Finishing Area call the Metal Finishing 90-Day CAA. I reviewed the weekly inspection logs for both CAAs and they appeared to meet the requirements. Both CAAs had adequate fire extinguishers and spill kits. Instead of phones and posted emergency call lists near each CAA, the facility uses a network of portable voice over internet protocol (VOIP) phones carried by a minimum of five managers on the floor at any time during operating hours, with company issued VOIP phones, with all the emergency contact numbers preprogrammed into the phones. Mr. West stated that there are no actual landline phones in the facility (outside of the business office area).

During the visual inspection of the Metal Finishing 90-Day CAA I observed that all the totes, and drums were labeled with “Hazardous Waste”, nature of the hazard, and accumulation start dates. There was also adequate aisle space to inspect the containers. This CAA had a rubber Ridge Lock brand Quick Berm containment base with ten-inch-high pop-up berms (see Photo 29).

During the visual inspection of the Production 90-Day CAA, I observed that the drums all appeared to be in good condition and free of damage or leaks. The drums of hazardous waste were labeled with “Hazardous. Waste,” the nature of the hazard, and the accumulation start date (all within 90 days). I did observe that the drums in the back were difficult to access to inspect or read their labels. I added a NOPF for inadequate aisle space in this CAA (see Photos 27 & 28). *Post inspection, I added NOPF 5 for the Production 90-Day CAA aisle space. On August 10, 2023, I contacted Mr. West via email to add the additional finding to the NOPF.*

- **NOPF 5: Failure to provide adequate aisle space in the Production 90-Day CAA as required in 40 CFR 262.255** *[NOPF was added post inspection]*

Preparedness and Prevention - The facility has numerous fire extinguishers, and eye wash stations. The paint mixing rooms have CO2 fire suppression systems. I observed adequate spill response equipment near the Paint Department and CAA (see Photo 18). As a LQG, the facility is required to have a Contingency Plan (CP) and a Quick Response Guide (QRG) (see Attachment #10). The facility is also required to have documentation that they have shared this plan with their local fire department and emergency response agencies. In reviewing the CP and QRG, Mr. West mentioned that it appeared that they had failed to update one of the primary onsite emergency coordinators with Ms. Linda Sandberg (Human Resource Director) when she took over this role about two years prior. Mr. West also stated that in the past they have had the local fire department do a walkthrough of the facility about once a year, but they have not done in several years (due to Covid-19). Mr. West also stated that he has shared the CP and QRG with the fire department and local emergency agencies in the last year or two, but he did not maintain any emails or records to document arrangements with those agencies.

- **NOPF 3:** Failure to maintain records documenting arrangements with local emergency agencies (FD, PD, EMS, Hospital) necessary to respond to an emergency as required in 40 CFR 262.256(b)
- **NOPF 4:** Failure to review and amend Contingency Plan and QRG after change in emergency coordinator list as required in 40 CFR 262.263(d)

Personnel Training - Mr. West stated that all staff working with hazardous waste must undergo initial and annual training in safely handling both hazardous waste and universal waste. Ms. Linda Sandberg provided example job descriptions for staff with hazardous waste handling duties that appears to meet the requirements (see Attachment #11). Mr. West provided an employee list of hazardous waste training with current dates (see Attachment #12).

5.0 SUMMARY OF FINDINGS

- **NOPF 1:** Failure to label waste batteries as “Universal Waste Batteries”, “Waste Batteries,” or “Used Batteries” as required in 40 CFR 273.14(a)
- **NOPF 2:** Failure to label waste lamps as “Universal Waste Lamps,” “Waste Lamps,” or “Used Lamps” as required in 40 CFR 273.14(e)
- **NOPF 3:** Failure to maintain records documenting arrangements with local emergency agencies (FD, PD, EMS, Hospital) necessary to respond to an emergency as required in 40 CFR 262.256(b) *[NOPF added post inspection]*
- **NOPF 4:** Failure to review and amend Contingency Plan and QRG after change in emergency coordinator list as required in 40 CFR 262.263(d) *[NOPF added post inspection]*
- **NOPF 5:** Failure to provide adequate aisle space in the Production 90-Day CAA as required in 40 CFR 262.255 *[NOPF added post inspection]*
- **NOPF 6A:** Failure to mark or label SAA containers of waste paint/thinner and still bottoms with “Hazardous Waste” as required in 40 CFR 262.15(a)(5)(i) *[NOPF added post inspection]*
- **NOPF 6B:** Failure to label SAA containers of still bottoms with the nature of the hazard as required in 40 CFR 262.15(a)(5)(ii) *[NOPF added post inspection]*

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: 2023.10.10 15:06:10 -05'00'

Mark Holcomb
Civil Investigator, SEE

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Amber Whisnant
RCRA Section Chief, ECAD/Chemical Branch

Attachments:

- 1) Facility Aerial Map Views (3 pages)
- 2) Photo Log (30 photos and 33 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) Manifests (7 Pages)
- 8) Lab Reports (11 pages)
- 9) City Wastewater Permit (36 pages)
- 10) Contingency Plan & Quick Reference Guide (18 pages)
- 11) Rosenboom HR Job Descriptions (2 pages)
- 12) Staff Hazardous Waste Training (3 pages)
- 13) Email – Discussion of Additional NOPFs (1 page)