

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

DONALDSON COMPANY INC.

2940 Airport Boulevard
Waterloo, Iowa 50703
319-300-3920

EPA ID Number: IAR000525543

On

August 14, 2024

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 CLAENE Group (Toeroek team) conducted a hazardous waste compliance evaluation inspection (CEI) at Donaldson Company Inc. (Donaldson) at 2940 Airport Boulevard in Waterloo, 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 results of the CEI.

PARTICIPANTS

Donaldson:

Mike Lockert, Operations Manager

Aaron Roth, Human Resources/Environmental Health and Safety Manager

Toeroek Team:

Clifford Nelles, Inspector, 816-213-5192

INSPECTION PROCEDURES

Prior to the CEI at Donaldson on August 14, 2024, I conducted a drive-by visual inspection. I did not observe any areas of concern during the drive-by. At approximately 8:00 a.m., I entered the main office and was met by Mr. Lockert. I explained that I was there to conduct a CEI. I asked to speak with Mr. Kevin Hemann, who was listed as the RCRA site contact on the Notification Acknowledgment/Verification Report (Verification Report) provided by EPA prior to the inspection (Attachment 1). Mr. Lockert explained that Mr. Hemann had retired and that he was the current operations manager. Mr. Lockert then contacted Ms. Roth, who arrived approximately 5 minutes later. I introduced myself to Ms. Roth and Mr. Lockert and explained the purpose and scope of the CEI. Ms. Roth, Mr. Lockert and I adjourned to a conference room where I proceeded to conduct an entry briefing with them.

During the entry briefing, I presented my business card and EPA credentials to Ms. Roth and Mr. Lockert. I explained the scope and procedures for the CEI. I explained the facility's right to make confidentiality claims for any or all the information obtained and provided a Notice Regarding Proprietary/Confidential Business Information. I stated that at the conclusion of the CEI, Mr. Lockert 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 Ms. Roth and Mr. Lockert 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 they read.

Copies of the following documents were left with Mr. Lockert during the inspection:

- RCRA Facility Access Information Sheet
- RCRA Section 3007
- U.S. Federal Codes 1001 and 1002
- Notice Regarding Proprietary/Confidential Business Information

The following documents were provided electronically to Ms. Roth and Mr. Lockert:

- E-Manifest Fact Sheet: Generators
- Managing your Hazardous Waste: A Guide for Small Businesses
- U.S. EPA Small Business Resources Information Sheet
- Solvent-Contaminated Wipes Final Rule Summary Chart
- IDNR Excluded Solvent-Contaminated Wipes Rule: Management Practices for Wipes, Rags, and Shop Towels
- 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
- TCLP – Toxicity Characteristic Leaching Procedure
- Part 279 Requirements: Used Oil Management Standards
- EPA Region 7 Emergency Response Program

- Chemical Facility Anti-Terrorism Standards
- Iowa Environmental Guide for Businesses

I reviewed the Verification Report (Attachment 1) with Ms. Roth and Mr. Lockert during the CEI. Based on this review, I changed the Site Contact Information section to reflect Mr. Lockert as the site contact. I made no other changes to the Verification Report.

I conducted a visual inspection of the facility, accompanied by Ms. Roth and Mr. Lockert. After the visual inspection, I reviewed facility records such as uniform hazardous waste manifests and safety data sheets (SDSs) for chemicals used at the facility. I prepared and completed a site-specific inspection checklist to document my observations.

At the conclusion of the CEI, I conducted an exit briefing with Ms. Roth and Mr. Lockert. During the exit briefing, I provided a Receipt for Documents and Samples, which Mr. Lockert signed, acknowledging receipt (Attachment 2). I provided Mr. Lockert the Notice, which he signed indicating no confidential business information had been provided (Attachment 3). I made no preliminary findings during the inspection so a Notice of Preliminary Findings (NOPF) was not left with the facility at the conclusion of the CEI. However, I explained to Ms. Roth and Mr. Lockert that findings might be added by EPA after review of the inspection report.

A site map obtained during the CEI is included as Attachment 4 and a Google Earth aerial photograph of the facility is included as Attachment 5. The seven photographs taken during the CEI are in Attachment 6, all of which are described in this report.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

Donaldson began operating in 1977 and employs 28 people who work one shift (6:00 a.m. to 2:00 p.m.) Monday through Friday. The facility purchases components and assembles them into indicators, gauges, switches, and sensors for engine air and liquid filtration systems. The assemblies are then sent to various other Donaldson facilities to be used in filtration system manufacturing.

Prior to assembly, components are cleaned with solvent (primarily isopropyl alcohol) on wipes. This process generates hazardous wipes. The facility considers hazardous wipes to be hazardous waste based on product and process knowledge. Maintenance activities at Donaldson generate spent batteries, spent aerosol cans, and general trash. Spent batteries and spent aerosol cans are managed as universal wastes according to provisions of Title 40 Code of Federal Regulations (40 CFR) Part 273, and are collected for recycling. Universal waste lamps are not generated, as the entire facility was re-lamped with light emitting diode (LED) fixtures in 2022. General trash is managed as nonhazardous waste and is transported to the Black Hawk County Landfill for disposal.

Donaldson is located in an industrial park near the airport on the west side of Waterloo, Iowa. The facility consists of one building with approximately 14,000 square feet under roof that houses office, shipping and receiving, and production areas. The facility's primary North

American Industrial Classification System (NAICS) code is 336390 (OTHER MOTOR VEHICLE PARTS MANUFACTURING). Donaldson has not previously been inspected by EPA.

2. RCRA Status

The Verification Report (Attachment 1) indicates that Donaldson is registered with EPA, under EPA ID IAR000525543, as a very small quantity generator (VSQG) of hazardous waste (generating less than 100 kilograms [kg] of hazardous waste per calendar month). During the CEI, I determined that Donaldson currently generates one hazardous waste stream (hazardous wipes) at a rate of approximately 63 pounds per year. Therefore, I confirmed that Donaldson is currently operating as a VSQG of hazardous waste and inspected the facility as such. I also inspected the facility as a small quantity handler (SQH) of universal waste (accumulating less than 5,000 kg of universal waste at any time).

3. Waste Streams

This section of the CEI report describes the waste streams generated by the facility, including the facility's waste determination, generation and management processes, and ultimate disposition. The following discussion of waste streams is based on conversations with facility representatives and the visual inspection.

Hazardous wipes consist of spent wipes with solvent (primarily isopropyl alcohol) used to clean components prior to assembly. A copy of the SDS for isopropyl alcohol is included as Attachment 7. The facility generates approximately 63 pounds (29 kg) of hazardous wipes per year. Hazardous wipes are accumulated on the production floor in 5-gallon containers labeled with the words "excluded solvent-contaminated wipes." The waste is then consolidated in a 55-gallon container labeled and managed as a hazardous waste accumulation container. I determined the facility manages hazardous wipes as hazardous waste and not excluded solvent-contaminated wipes.

Hazardous wipes are collected by Veolia ES Technical Solutions (Veolia) and transported to Veolia in Menomonee Falls, Wisconsin, for fuel blending. Copies of the uniform hazardous waste manifests for annual shipments of hazardous wipes in 2022, 2023, and 2024, are in Attachment 8.

During the CEI, I observed a 5-gallon container of hazardous wipes in the front production area (Attachment 6, Photograph 1). I observed two more 5-gallon containers of hazardous wipes in the back assembly and research lab areas of the facility. All three containers were labeled with the words "excluded solvent-contaminated wipes," closed, lined with plastic, and dated June 19, 2024. None of the containers held free liquid.

I also observed a 55-gallon container of hazardous wipes in the facility's hazardous waste container accumulation area (Attachment 6, Photographs 2 and 3). The container was structurally sound, closed, labeled with the words "hazardous waste" and an indication of the nature of the hazard, and dated July 29, 2024. The container held approximately 10 gallons of hazardous wipes. I noted no concerns with management of hazardous wipes since a VSQG facility is not

subject to RCRA container management requirements. I provided compliance assistance regarding management of excluded solvent-contaminated wipes during the CEI.

Spent batteries are generated during equipment maintenance. The facility generates approximately five spent batteries per month. Donaldson manages spent batteries as universal waste according to provisions of 40 CFR Part 273. Spent batteries are accumulated in a 2-gallon container and are collected by Veolia for recycling.

During the CEI, I observed a spent batteries container in the maintenance shop (Attachment 6, Photographs 4 and 5). The container held three spent batteries, and was structurally sound, labeled with the words “universal waste batteries,” and dated July 29, 2024. I noted no deficiencies with management of spent batteries during the CEI.

Spent aerosol cans are generated during equipment maintenance and production. The facility generates approximately two spent aerosol cans per month. Donaldson manages spent aerosol cans as universal waste according to provisions of 40 CFR Part 273. Spent aerosol cans are accumulated in a 2-gallon container and are collected by Veolia for recycling.

During the CEI, I observed a spent aerosol cans container in the maintenance shop (Attachment 6, Photographs 6 and 7). The container held two waste aerosol cans, and was structurally sound, labeled with the words “waste aerosols” and “cans,” and dated July 29, 2024. I noted no deficiencies with management of spent aerosol cans during the CEI.

General trash is generated during facility maintenance. The facility has determined that general trash is nonhazardous waste based on product and process knowledge. General trash includes, but is not limited to, floor sweepings, paper, and cardboard packaging. General trash is transported by Waste Management, and is landfilled at the Black Hawk County Landfill. During the CEI, I observed accumulation of general trash and noted no deficiencies.

4. Summary of Preliminary Findings

In summary, as part of the CEI, I made no preliminary findings. However, further review by EPA may change or add to my findings.

Clifford A.
Nelles

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Clifford A. Nelles, Inspector
CLAENE Group

AMBER WHISNANT

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

Attachments:

1. Notification Acknowledgement/Verification Report (2 pages)
2. Receipt for Documents and Samples (1 page)
3. Confidentiality Notice (1 page)
4. Site Map (1 page)
5. Google Earth Aerial Photograph (1 page)
6. Photographic Documentation (Photolog and 7 Photographs) (5 pages)
7. Copy of SDS for Isopropyl Alcohol (12 pages)
8. Copies of Manifests Dated June 2, 2022, August 15, 2023 and July 25, 2024 (3 pages)