

# REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

## **IOWA ARMY NATIONAL GUARD – FMS 12**

505 W Carpenter Ave  
Fairfield, Iowa 52556

EPA ID Number: IAD981504228

On

February 8, 2022

By

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region VII

Enforcement and Compliance Assurance Division

## **1.0 INTRODUCTION**

At the request of the Enforcement and Compliance Assurance Division (ECAD), I performed a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at the Iowa Army National Guard in Fairfield, Iowa. The inspection was conducted on February 8, 2022. The CEI was conducted under the authority of RCRA Section 3007(a), as amended.

During the inspection, I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. This report and attachments present the results of the CEI. Based on the information obtained during the inspection, I inspected Iowa Army National Guard as a small quantity generator (SQG) of known hazardous waste (HW), and a small quantity handler of universal waste (SQHUW) lamps, and a used oil generator. According to the U.S. Environmental Protection Agency (EPA) RCRAInfo database, the facility had been previously inspected by the EPA on September 15, 1994.

## **2.0 PARTICIPANTS**

### Iowa Army National Guard:

Erick Cluney, CW3, Surface Maintenance Mechanic Supervisor (3 years in position)  
Kandice Miller, SSG, Environmental Compliance & Mechanic (5 years in position)  
Jayson Keil, SSG, Environmental Compliance & Mechanic (1 year in position)

### EPA:

Mark Holcomb, Civil Investigator (NOWCC/SEE) (Lead Inspector)  
H.D. “Doug” Bryant, Civil Investigator (NOWCC/SEE) (Training Preceptor)

### 3.0 INSPECTION PROCEDURES

On February 8, 2022, Doug Bryant and I arrived unannounced at the facility's main entrance at about 0900 hours. Initially we conducted a visual reconnaissance of the building/facility searching for areas of concern observable from the adjacent public roadway and parking lot. Most of the facility grounds is surrounded by a security fence and not readily observable. I identified no environmental issues or concerns during this preliminary examination. At an office inside near the front door, we met Chief Warrant Officer (CW3) Erick Cluney. I introduced myself and I asked for Shannan Garretson, who is listed on our Site Verification Report as the site contact. I was informed by Chief Cluney that Ms. Garretson is their Environmental Program Manager, but her office was at their central facility at Camp Dodge in Johnston, Iowa, and he told us that he was the shop supervisor of this facility, and he could help us. Chief Cluney contacted his two environmental compliance specialists that were on duty in the nearby maintenance shop and asked them to join us. We were joined by Staff Sergeants (SSG) Kandice Miller, and SSG Jayson Keil. Chief Cluney stated that he had been with Iowa Army National Guard for over 19 years, including three years in his current role as the shop supervisor. Chief Cluney told us there were currently no specific COVID-19 requirements and the only safety personal protective equipment (PPE) requirements at this shop were safety shoes and protective glasses. He offered us to use the next-door breakroom as our meeting and staging point for the day.

At the opening conference, I introduced myself and presented my EPA ID. I also introduced my colleague Mr. Doug Bryant. I explained that I was the lead investigator, but I was also in training and that Mr. Bryant was my trainer and our credentialed inspector. Mr. Bryant presented his credentials. I explained the purpose and procedures of the inspection. I presented Chief Cluney with a copy of RCRA Section 3007(a), which provides 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 made him aware of their confidentiality rights and informed him that a Confidentiality Notice would be provided at the end of the inspection to make a confidentiality claim if they so desired.

The RCRA inspection 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. During the visual inspection, Chief Cluney, SSG Miller, and SSG Keil were present throughout the inspection. Chief Cluney, SSG Miller, and SSG Keil were also present for the opening and exit conferences.

I conducted a visual inspection of the following:

- General Work Bay
- Wash Bay
- Unheated Storage Room 002 - (secondary Central Accumulation Area CAA)
- Battery Room
- Flammable Storage Room 005 – (main CAA)
- Bulk Petroleum/Oils/Lubricants (POL) Room 006

Document Photocopies and Photographs were collected as inspection documentation (see Attachments #1-21 and Photos 1-28). The photo log is included in Attachment #3. Information collected during the inspection is documented on an Entry/Exit checklist and hazardous waste compliance checklists and notebook. I reviewed documents including the following: Safety Data Sheets (SDS); bill of lading; waste profiles; inventory list; and manifests.

On February 8, 2022, at the conclusion of the inspection, I held a closing conference. Participants included Chief Cluney, SSG Miller, SSG Keil, and Doug Bryant. I provided Chief Cluney with a Receipt for Documents (see Attachment #4) and a Confidentiality Notice (CBI) (see Attachment #5) which he signed as acknowledgement of receipt. No confidential business information (CBI) claims were made. I summarized my findings and recommendations and provided Chief Cluney with a Notice of Preliminary Findings (NOPF), which he signed to acknowledge receipt (see Attachment #6). I provided inspection and compliance assistance documents during the inspection, some as paper versions and some in electronic PDF via email, that included the following:

- *RCRA Section 3007(a)*
- *Title 18 U.S. Code, Sections 1001 and 1002*
- *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 Receipt for Documents and Samples*
- *Notice of Preliminary Findings (NOPF) with Instructions for Responding on back of form (top page of the completed carbonless transfer set)*
- *Instructions for Responding to a Notice of Preliminary Finding (NOPF) (EPA Handout)*
- *U.S. EPA Small Business Resource Information Sheet (EPA Handout)*
- *Solvent-Contaminated Wipes Final Rule Chart (EPA Handout)*
- *Recycling Electronics (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*

I followed the inspection procedures detailed in the RCRA CEI Standard Operating Procedure (SOP) 2321.1, unless noted otherwise. On February 28, 2022, I called Chief Cluney, and on March 1, 2022, we had a brief conference phone call, that included SSG Miller and SSG Keil, so I could ask a few more questions and clarify my notes regarding some of the waste streams.

## **4.0 FINDINGS AND OBSERVATIONS**

### **4.1 Facility Information and Operations**

Chief Cluney stated that this Iowa Army National Guard facility at this location began operations in 1950. This location serves as a regional vehicle maintenance facility for the Iowa Army National Guard system, with their home maintenance facility located at Camp Dodge in Johnston, Iowa. They provide maintenance services to a wide range of military vehicles in their fleet. This Iowa Army National Guard facility in Fairfield, Iowa, employs approximately 12 staff mostly working Monday-Friday day shift. The Iowa Army National Guard facility has one primary building (approximately 12,000 square feet) with general parking on the south side of the facility and a tall barb-wire topped security fence surrounding an approximately three-acre sized lot with parking for military vehicles on the east and north sides. They also have a 4000-gallon underground fuel tank on the west side of the shop building. See Attachment #1 for the facility aerial view and map location. See Attachment # 2 for a facility diagram and see Photo 1 for an outside view of the facility from the south parking lot. Raw materials used includes engine oil, antifreeze, grease, gear oil, aerosol paint spray cans, and brake cleaner.

### **4.2 Facility RCRA Status**

The RCRAInfo does not list a previous RCRA compliance inspection for Iowa Army National Guard, but I did find what appeared to be an old inspection report from September 15, 1994.

According to the RCRAInfo Notification Acknowledgement/ Verification Report, Iowa Army National Guard last notified as a Small Quantity Generator (SQG) on August 2, 2021. I provided Chief Cluney with the Notification Acknowledgement/ Verification form, which he reviewed and returned with no changes (see Attachment #7). The RCRAInfo eManifest report indicates they generate D001, D008 waste codes. Chief Cluney had stated that they consider their spent antifreeze to be hazardous waste due to a potentially higher content of lead from the larger military vehicles radiator systems, and also that they train and strive to always meet the higher standards of the EPA SQG category even if they are generating less than the 220 lbs of hazardous waste per month and may occasionally meet the VSQG requirement status levels. At the time of the inspection, based on the facility's hazardous waste generation rate (220-2200 pounds of non-acute hazardous waste generated per month), I determined Iowa Army National Guard to be an SQG of hazardous waste generator. In addition, I determined Iowa Army National Guard to be a small quantity handler of universal waste-lamps, batteries, and a used oil generator. See Attachment #9 for a detailed summary hazardous waste inventory list (dated January 7, 2022) along with a reference to their respective SDS documents.

### **4.3 Facility Waste Streams and Management**

The following waste streams are managed by Iowa Army National Guard:

**Waste Aviation Fuel** – The Iowa Army National Guard estimates their generation rate of this waste stream to range between 76 lbs and 114 lbs per month. This calculation is based on the manifest below that indicates the average drum shipped weighted 457 lbs. Chief Cluney stated that they routinely generate one drum of this waste approximately every four to six months, or  $457 \text{ lb} / 6 \text{ months} = 76 \text{ lbs}$ , and  $457 \text{ lbs} / 4 \text{ months} = 114 \text{ lbs per month}$ . The process that generates this waste is removing fuel from vehicles during maintenance procedures. They have determined this waste to be hazardous based on product and process knowledge. Waste codes include: D001 and D018. Chief Cluney stated that the Army National Guard uses higher quality aviation fuel for their military vehicles instead of standard diesel fuel. Chief Cluney also stated that they try to reuse any on-spec fuel and only waste off-spec fuel typically contaminated with oil. The attached August 11, 2021 manifest (see manifest Attachment #8) indicates they shipped seven drums at 3200 lbs total weight. This averages out to 457 lbs per drum ( $3200 / 7 = 457 \text{ lbs}$ ). Onsite management includes storing this waste in a 55-gal drum in the 005 Flammable Storage Room (CAA). In the Flammable Storage Room I observed two 55-gallon drums labeled waste aviation fuel. The black 55-gal drum of waste aviation jet fuel was full. The drum was closed and in good condition (see Photo 25). This drum was properly labeled with “Hazardous Waste” and nature of hazard (flammable) and start date of – Jan 20, 2022. The second 55-gallon white steel drum was empty. This drum was also labeled “Hazardous Waste” and “Flammable” (see Photos 21 and 22). The drum appeared to be in good condition. When the drums are full, they are shipped by EnviroVac Waste Transport Inc and transported to Clean Earth of Calvert City in Calvert City, KY. The off-site management is indicated as code H141 for: storage and transfer -the site receiving this waste stored/bulked and transferred the waste with no reclamation, recovery, destruction, treatment, or disposal at that site. Chief Cluney stated that Safety Kleen was not used to transport their waste fuel due to an apparent concern about oil contamination.

**Used Oil** - The Iowa Army National Guard estimates their generation rate of used oil to be about 280 lbs per month. Safety Kleen had just picked up 200 gallons of used oil earlier this same day from their 280-gallon cube tank in the Flammable Room (see the invoice dated 2/8/2022 as Attachment #10). Their previous shipment of this waste stream was in August 2021 per Chief Cluney, or about 5 months ago. The generation rate was calculated by taking the 200 gallons / 5 months equals 40 gallons per month or approximately 280 lbs per month, estimating oil at 7 lbs per gallon. The generation process for this waste stream is from oil changes preventive maintenance of military vehicles. Their waste determination is as non-hazardous based on product and process knowledge and is handled as used oil. Their onsite storage and accumulation of the used oil includes collecting in low profile mobile collection devices (see Photo 20), the red one is labeled “used oil, and then pouring the used oil into the 280-gal cube tank in the Flammable Storage Room (CAA). On my visual inspection the cube tank was empty, appeared to be in good condition with no observed leaks and labeled with “Used Oil” (see Photo 24). Safety Kleen transports the used oil to the Safety Kleen facility in Des Moines, Iowa for recycling.

**Used Oil Filters** - The Iowa Army National Guard estimates their generation rate of used oil filters to be about 20 lbs per month. Chief Cluney estimated this by stating their most recent shipment was on December 14, 2021, in which they shipped two 30-gal drums at 176 lbs

(see Invoice Attachment #16). Their previous shipment was in March 2021 or about 9 months prior. 176 lbs / 9 months equals about 20 lbs per month. The used oil filters are routinely generated from vehicle oil changes and preventive maintenance. Their waste determination is as non-hazardous based on product and process knowledge. Their onsite management of the oil filters includes crushing in an Oberg oil filter crusher (see Photo 23) and the crushed filters are placed in the red 30-gal drum next to the oil filter crusher and labeled with “used oil” located in the Flammable Room (CAA). The used oil drained from the filters is placed in the 280-gallon used oil cube tank in the same Flammable Room. Safety Kleen transports the used oil filters to the Safety Kleen facility in Des Moines, Iowa for recycling.

**Waste MFV (mobile fuel vehicle) Fuel Filters** - The Iowa Army National Guard estimates their generation rate of waste fuel filters to be about 67 lbs per month. Chief Cluney estimated this by stating that they ship approximately six full 55-gal drums of waste fuel filters per year or about 800 lbs per year. 800 lbs / 12 months equals about 67 lbs per month. See Attachment #11 for a used fuel filter manifest from December 21, 2021. The used fuel filters are routinely generated from vehicle maintenance. Their waste determination for the used fuel filters is as hazardous waste with a D001 and D018 waste codes. Onsite management includes crushing in the same used oil filter crusher and then storing this waste in a 55-gal drum in the 005 Flammable Storage Room (CAA). Any excess fuel drained in the crushing process is placed in the Waste Aviation Fuel drum. During my visual inspection in the Unheated Storage Room 002, I observed a full, black steel 55-gal Waste MFV Fuel Filter drum, that was plastic wrapped and secured to a wooden pallet ready for transport. See Photos 6, 7, and 8. SSG Miller stated that it was placed in this room to help maintain adequate spacing between drums in the Flammable Storage Room. Since this was a full drum ready to be shipped, they also consider this area to be part of the CAA. The drum was labeled as “hazardous waste” along with the nature of the hazard as “flammable”, but it was missing the accumulation start date. Note from Photo 8 that this was corrected at the time of the inspection with an accumulation start date of “3 February 2022”. When the Waste MFV Fuel Filter drums are full, they are shipped by EnviroVac Waste Transport Inc and transported to Clean Earth of Calvert City in Calvert City, KY. The off-site management is code H141 for: storage and transfer -the site receiving this waste stored/bulked and transferred the waste with no reclamation, recovery, destruction, treatment, or disposal at that site.

- **Date container of waste fuel-filters in Room 002 as required in CFR 262.16(b)(6)(i)(c) NOPF 2**

**Used Antifreeze** – Chief Cluney stated the Iowa Army National Guard estimates their generation rate of this waste stream to be about 80 lbs per month. The attached April 21, 2021 manifest (see manifest Attachment #12) indicates they shipped two drums at 950 lbs total weight. They previously shipped one drum in April 2020 for a period of about 12 months between shipments. 950 lbs / 12 months equals 80 lbs per month. The process that routinely generates this waste is from vehicles maintenance procedures. They have determined this waste to be hazardous based on product and process knowledge with a waste code of D008. Chief Cluney stated that they feel that there may be increased levels of lead in the radiator coolant systems of the larger military vehicles. Onsite management includes collecting in low profile green mobile containers and then poured into the white 55-gal poly drum (see Photo 20).

During the visual inspection I observed an empty 55-gallon white poly drum in the Flammable Room next to the Used Oil cube tank (see Photos 20 and 24). The drum appeared to be in good condition. When the drums are full, they are shipped by EnviroVac Waste Transport Inc. and transported to Clean Earth of Calvert City in Calvert City, KY. The off-site management code appears (hand-written difficult to read) to be H010 for: metal recovery or H110 for: stabilization prior to land disposal at another site (encapsulation / stabilization / fixation).

**Waste Lead-Acid Batteries** – Iowa Army National Guard generates only a small number of automotive lead-acid batteries estimated by Chief Cluney at approximately four batteries per year. These batteries are replaced as part of the routine vehicle maintenance process. During the visual inspection I observed about a dozen batteries on containment bases inside of the Battery Room (see Photo 10). Chief Cluney stated that all these batteries were undergoing lead-acid battery reconditioning/reclamation and that none of them were waste batteries at that point. He stated that they have had a greater than 90% success rate in reconditioning used batteries and putting them back into service. The small number of spent vehicle battery cores are then swapped out for a new battery from their sister maintenance shop in Middleton, Iowa and from there sent to Excide or Interstate Batteries for recycling. The batteries are managed under 40 CFR Part 266, Subpart G.

**Absorbant** - The Iowa Army National Guard estimates their generation rate of absorbant is about one 55-gallon drum, or about 250 lbs, per year. Photo 5 shows an “Oil-Dry” absorbant dispenser can. It is used primarily to cleanup small oil spills on the shop floor. Their waste determination is as non-hazardous and what they called a “special waste”, based on product and process knowledge. See Photo 17, in the foreground of this picture is a closed 55-gallon drum, labeled “Special Waste Spill Debris” on the lid. It contained absorbant used to clean up minor oil spills. See Photo 19 for a view of the label on the side of the drum. Chief Cluney stated that they sweep up the used absorbant and place it in the 55-gallon steel drum (located in the Flammable Room CAA). They also have access to a mechanical Magnum floor scrubber sweeper to help keep the floors clean (see Photo 13). Any oil contaminated oil dry absorbant swept up with the Magnum is collected in the special waste spill debris drum in the Flammable Room. Approximately once a year, they self-transport the drum to Camp Dodge’s warehouse (their organization’s central maintenance facility) for processing. Chief Cluney was not sure of where Camp Dodge sends it for final processing.

**Spent Reusable Shop Rags** – The Iowa Army National Guard estimates their generation rate of solvent contaminated shop cloth rags to be about 30 rags per month. Chief Cluney stated that the rags are only used for cleaning the mechanic’s hands and may be contaminated with grease and solvents such as brake cleaner and are treated as excluded solvent contaminated wipes (see Attachment #19 for SDS of Skillcraft Brake Cleaner). Chief Cluney stated that they have a process for making sure the rags are not soaked with liquid solvents and are not accumulated onsite for more than one week. Daily the rags are collected from the small step cans and taken to the Storage Room at the end of each workday. Once a week Aramark picks up the soiled rags and delivers clean rags. During the visual inspection I observed a red, closed, 5-gal step can, about 1/3 full, with no free liquids noted. It was properly labeled “excluded solvent contaminated wipes” (see Photos 11 and 12, in Photo 11 the step can was opened for the photo).

They have a contract with Aramark that picks up the rags and takes them to their facility in Ottumwa Iowa for laundering.

**Spent Universal Waste Lamps** – Iowa Army National Guard generates only a small number of spent Universal Waste lamps during their switch over to LED. They had only generated the five universal waste florescent lamps in a little more than a year. They also generated a full 18-inch x 18-inch x 18-inch square box of head and taillights in the last six months. During the visual inspection, I observed two boxes of spent lamps in the Flammable Room (see Photos 17 and 18). One large tube box was structurally sound with a closed lid. The tube box contained four spent florescent lamps. The tube box was labeled as “Universal Waste Lamps containing Mercury”. I noted the accumulation start date listed as January 19, 2021 (more than 1 year), but I did not make an NOPF for this at the time of the inspection. NOPF 3, below, was added after the inspection. The other square box was not securely closed on the top (see Photo 18) and was labeled as “Universal Waste Lamps containing Lead”. Chief Cluney stated that this box was full and contained military vehicle head lights and taillights, some of which may contain lead. The square box had an accumulation start date of July 8, 2021 (less than a year). Note: during my March 1, 2022 conversion with Chief Cluney, he stated that the two boxes of universal waste lamps had already been transported to Camp Dodge for recycling/processing.

- **Keep universal waste lamps in a closed and structurally sound container as required in 40 CFR 273.13(d)(1) NOPF 1**
- **Do not accumulate Universal Waste for longer than one year as required in 40 CFR 273.15(c): NOPF 3 (added after inspection)**

**Wash Bay Pit Sludge** – The Iowa Army National Guard generates debris/sludge from the drain in their vehicle Wash Bay (see Photos 2, 3, and 4). The last time the drain pit was cleaned out was December 10, 2018, by Hydro-Kleen LLC, out of Des Moines, Iowa and generated 629 gallons. See Attachment #13 for the non-hazardous waste manifest. They have determined this waste to be non-hazardous based on product and process knowledge. Hydro-Kleen transports the waste to their HK Pretreatment plant in Des Moines, Iowa for processing.

**Parts Washer Detergent** – The Iowa Army National Guard generates a variable amount of discharge from their aqueous parts washer using a soap detergent cleaner (see Photos 4, 14 and 15). See Attachment #18 SDS for the Aerogreen Parts Washer Degreaser. The SDS states that the contents are “non-hazardous” and “Non-Flammable”. Their waste determination is as non-hazardous based on product and process knowledge. Chief Cluney stated that they only clean mechanical parts such as engine intakes. In addition to the parts washer water and detergent, there may be a small amount of dirt, grime, grease, and oil. Chief Cluney stated they have worked with their environmental office at Camp Dodge and developed a process in which they use a skimmer daily to skim off any oil and transfer the waste oil to the used oil cube tank. They have approval from the City of Fairfield to use the Publicly Owned Treatment Works (POTW) for this waste discharge (see Attachment #14 Letter from City).

**Used Grease** - The Iowa Army National Guard estimates their generation rate of used grease to be about five gallons per year. The process to generate used grease typically comes from repacking bearings and cleaning off semi-truck hitch connections. Chief Cluney stated that

they generally try to reuse and recycle the grease from the one two-gallon can for several months (see Photo 26). Their waste determination is as non-hazardous based on product and process knowledge. Chief Cluney stated that any grease not used is sealed in the two-gallon cans and shipped back to Camp Dodge as a “special waste”. I observed one steel two-gallon can of grease, with the lid closed, contents labeled, and about ¼ full.

**Empty Aerosol Cans** - The Iowa Army National Guard estimates their generation rate of spent aerosol cans to be about one 30-gallons drum per year or about 80 lbs. SSG Miller stated that it is generally small 16 oz aerosol cans of green and brown spray paint, and they typically only generate about three to four empty cans per month. The cans are not punctured. Chief Cluney stated that they determined this waste stream to be non-hazardous based on product and process knowledge and treat it as aerosol can universal waste. During the visual inspection I did not observe any waste aerosol cans. The 30-gallon drum is self-transported to Camp Dodge for recycling.

**Scrap Lead** - The Iowa Army National Guard generates very little scrap lead and estimates their generation rate of scrap lead to be less than five lbs per year. Chief Cluney stated the scrap lead comes from vehicle battery terminals. As mentioned earlier, most batteries are reconditioned and put back into service. Chief Cluney stated that they determined this waste stream to be exempt due to recycling. The scrap lead is boxed up and self-transported to Camp Dodge periodically for recycling/processing.

**General Trash** – The Iowa Army National Guard estimates their generation rate of general trash to be approximately 1/3 of a seven-cubic yard waste bin. The waste is generated by general operations. Chief Cluney stated that they determined this waste stream to be non-hazardous based on product and process knowledge. Waste Management in Fairfield, Iowa picks this up weekly and transports to the local landfill.

**Cardboard and Paper** – The Iowa Army National Guard estimates their generation rate of cardboard to be about three cubic yards per quarter and paper around one 55-gallon trash bag per quarter. The waste is generated by general operations. Chief Cluney stated that they determined this waste stream to be non-hazardous based on product and process knowledge. They self-transport this waste quarterly to Connelly Recycling Center in Fairfield, Iowa.

#### **4.4 Other Regulatory Requirements**

**Outside Facility Perimeter** - I did a limited inspection of the outside perimeter of the facility and observed no hazardous waste storage tanks, containers, or other stored waste. Most of the surrounding two to three acres around the main shop building is parking for military vehicles. There was an underground 4000-gallon fuel tank on the west side of the shop that I did not inspect as well as an outside shed that Chief Cluney told us did not contain any hazardous wastes. The complex is surrounded by a barb-wire topped security fence.

**CAA** – The CAA is two rooms located next to and just off the General-Purpose Shop Bay (north side of the building) in room 005 called the Flammable Storage Room and the Unheated Storage

Room 002. Both CAA rooms are well equipped with fire suppression systems and spill kits. The CAA and drums are inspected weekly. See Attachment #21 copies of recent checklists. See Photos: 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26 and 27. I reviewed the management of the CAA and no other findings were noted.

**Preparedness and Prevention** – The Iowa Army National Guard has an emergency plan that includes a designated emergency coordinator that is available onsite and/or on-call. The emergency coordinator's contact information, location of fire extinguishers, fire alarm pull-stations, and spill control equipment (see Photos 27 and 28) are posted next to the landline phone near the building exit door just outside of the CAA Unheated Storage Room and the CAA Flammable Room (see Attachment #15 and Photo 9). They have made arrangements and shared information with their local fire department and emergency agencies (see Attachment #17 for letter acknowledged by local fire department chief dated June 29, 2021). They conduct detailed weekly CAA inspections and monthly facility inspections (see Attachment #21 for checklists). They also have an automatic external defibrillator (AED) located on the south wall of the General-Purpose Shop Bay and a centralized fire alarm system.

**Personnel Training** – All employees that have hazardous waste handling duties are required to initially complete a day of waste handling training and emergency procedures as well as annual recurrent training. The two staff that have primary environmental compliance responsibilities have also completed a two-day training course in Environmental Management. See Attachment #20 for their staff training sign-in sheets and certificates.

## **5.0 SUMMARY OF FINDINGS**

**NOPF 1: Keep universal waste lamps in a closed and structurally sound container as required in 40 CFR 273.13(d)(1)**

**NOPF 2: Date containers of waste fuel-filters in Room 002 as required in CFR 262.16(b)(6)(i)(c)**

**NOPF 3: Do not accumulate Universal Waste for longer than one year as required in 40 CFR 273.15(c) (added after 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: 2022.03.14 14:55:33 -05'00'

Mark Holcomb  
Civil Investigator

AMBER  
WHISNANT

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WHISNANT  
Date: 2022.03.22 14:08:43 -05'00'

Amber Whisnant  
RCRA Section Chief, ECAD/CB

**Attachments:**

1. Facility Aerial Photo (1 page)
2. Facility Diagram (1 page)
3. Photo log (14 pages/ 28 photos)
4. Receipt for Documents (2 pages)
5. Confidentiality Notice (1 page)
6. Notice of Preliminary Findings NOPF (1 page)
7. EPA RCRA Notification Acknowledgement/ Verification Report (1 page)
8. Manifest- Fuel (1 page)
9. Hazardous Substance Inventory (22 pages)
10. Invoice- Used Oil (1 page)
11. Manifest- Fuel Filters (1 page)
12. Manifest- Antifreeze Lead (1 page)
13. Manifest- Wash Bay Pit Waste (1 page)
14. Letter- City POTW Approval (1 page)
15. Emergency Contact Sheet (1 page)
16. Invoice- SK Oil Filters (1 page)
17. Letter to Fairfield Fire Chief (2 pages)
18. SDS- Aerogreen Parts Washer Degreaser (6 pages)
19. SDS- Brake Cleaner (14 pages)
20. Training Certs and Sign-in Sheets (4 pages)
21. Checklists-Weekly and Monthly (3 pages)