

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

LARCHWOOD FACILITY

1447 140th Street
Larchwood, Iowa 51241

EPA ID Number: IAD115075475

On

June 15, 2021

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 Tetra Tech Inc. (Toeroek team) conducted a hazardous waste compliance evaluation inspection (CEI) at the Larchwood Facility (Larchwood) at 1447 140th Street, Larchwood, Iowa. The CEI was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. The CEI was intended to cover hazardous waste generator requirements, used oil management, and universal waste requirements, as applicable. This report and its attachments present the findings of the CEI.

PARTICIPANTS

Elanco Animal Health (Elanco):

Donald Blair (by telephone and email only)

Lyon County Economic Development:

Steve Simons (by telephone and email only)

Former Owner:

Eric Schuler (by telephone only)

Toeroek Team:

Heather K. Wood, Inspector, 816-412-1768

INSPECTION PROCEDURES

Prior to the CEI at Larchwood, I began background research on the facility in attempt to find a contact phone number. Due to the COVID-19 pandemic, I was attempting to contact the facility to schedule the inspection. The Hazardous Waste Site Info Verification Report (Verification Report) provided by EPA identified the site contact as Mervyn Carneiro of Elanco Animal Health (Attachment 1). I emailed Mr. Carneiro, but Mr. Blair responded.

According to Mr. Blair, Elanco began the process of divesting itself of the Larchwood property in 2018. The facility was sold to Mr. Schuler in August 2018, a fact I verified on the Lyon County tax assessor website (Attachment 2). According to Mr. Blair, Elanco leased the property back from Mr. Schuler until the end of 2019, when it discontinued operations at the facility.

After speaking to Mr. Blair, I researched the facility online. I found news reports from 2018 that Mr. Schuler had purchased the facility in an attempt to keep the facility operating as a biotechnology company (Attachment 3, Pages 1 and 3). However, I also found advertisements for auctions selling the buildings fixtures in August and September 2020 (Attachment 3, Pages 7 and 11). Moreover, the parcel report indicated that the facility had been sold again in May 2021 to a California company (Attachment 2). Based on this information, it appeared that the facility was no longer operating. The county records did not have a phone number or email address for the new owner.

I arrived at the facility on June 15. The entrance to the facility was blocked with a chain (Attachment 4, Photograph 1). Based on what I could see from the public right-of-way, there did not appear to be any activity at the facility (Attachment 4, Photographs 2 and 3). There was no contact information or signage at the entrance of the facility. The buildings appeared to be in good condition, and I did not observe any waste containers from the right-of-way. Photographs taken by the Lyon County tax assessor are included in the parcel report (Attachment 2, Pages 3 through 15). Based on the lack of activity (that is, no vehicles or people), most of these

photographs appear to have been taken after Elanco ceased operations at the facility. No waste is visible in any of these photos. An aerial photograph of the facility that I downloaded after the inspection is Attachment 5.

After returning from the inspection, I contacted Lyon County on June 18, 2021, in an attempt to get contact information for the new property owners. I spoke to Mr. Simons, who provided a phone number and email address for the new property owner, Larchwood 1447 LLC. I updated the Verification report with the new owner contact information and the new generator status (non-generator). I also removed the waste codes and the North American Industry Classification System (NAICS) code. According to Mr. Simons, the new owners intend to use the property for warehousing.

I spoke with Mr. Schuler on June 30. He confirmed that he had sold all building fixtures in 2020 and the property in 2021. He said that operations at the facility ended when Elanco left and that no additional waste was generated during his sole occupancy of the property. He said that all waste had been removed when Elanco vacated the property.

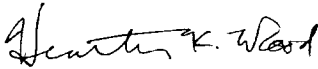
I also spoke with Mr. Blair again on June 30. He confirmed that the waste was all removed for disposal when Elanco vacated the property. He said that all manifests were tracked in the EPA E-Manifest system and that the last shipment was in November 2019. I ran an E-Manifest Report from RCRAInfo for the period from October 1, 2019, through February 29, 2020 (Attachment 6). I confirmed the last shipment date of November 7, 2019. I also observed multiple shipments of hazardous and nonhazardous waste on October 23, 2019, (Attachment 6, Pages 2 through 6) including:

- 4.92 tons of thimerosal waste (D009)
- 0.35 tons of used thimerosal absorbent waste (D009)
- 0.30 tons of corrosive caustic waste (D002)
- 0.02 tons of bleach waste (D002)
- 0.02 tons of ammonia waste (D002)
- 0.09 tons of formaldehyde waste (D001, U122)
- 0.08 tons of hydrogen peroxide waste (D001)
- 0.001 tons of hydrofluoric acid waste (D002, U134)
- 0.002 tons of phosphoric acid waste (D002)
- 0.003 tons of nitric acid waste (D001, D002)
- 0.003 tons of organic acid waste (D002)
- 0.005 tons of waste aerosols (D001)
- 0.06 tons of acetone solvent waste (D001, F003, U002)
- 0.16 tons of waste paint-related material (D001)

Based on my observations and research, I concluded that the facility was not currently generating any hazardous waste.

SUMMARY OF PRELIMINARY FINDINGS

In summary, I did not make any preliminary findings as a result of this inspection. However, further review by EPA may change or add to my findings.



Digitally signed by Heather K.
Wood
Date: 2021.08.05 15:25:59 -05'00'

Date: _____

Heather K. Wood, Inspector
Tetra Tech Inc.

AMBER WHISNANT

Digitally signed by AMBER
WHISNANT
Date: 2021.08.09 21:34:11 -05'00'

Date: _____

Amber Whisnant, Section Chief
ECAD/CB/RCRA

Attachments:

1. Hazardous Waste Site Info Verification Report (2 Pages)
2. Lyon County Parcel Report (18 Pages)
3. News Reports regarding Larchwood Facility (14 Pages)
4. Photographic Documentation (3 Photos and Photolog) (3 Pages)
5. Google Earth Aerial Images of the Facility (1 Page)
6. E-Manifest Report (6 Pages)