REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

INDUSTRIAL LAMINATES/NORPLEX INC.
665 Lybrand Street
Postville, Iowa 52162
563-864-4232

EPA ID Number: IAD073489288

On

June 14, 2022

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 Industrial Laminates/Norplex (Norplex), at 665 Lybrand Street in Postville, 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 findings of the CEI.

PARTICIPANTS

Norplex:

Tim Delaney, Environmental and Technical Safety Manager
Derrick Eilers, Environmental and Technical Safety Technician

Toeroek Team:

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

INSPECTION PROCEDURES

Prior to the CEI at Norplex on June 14, 2022, I conducted a drive-by inspection. I did not observe any areas of concern during the drive-by. Upon my arrival at 8:45 a.m., I entered the visitor's entrance and explained the purpose of the CEI to the reception attendant. The reception attendant contacted Mr. Delaney, who met me at the entrance. I introduced myself to Mr. Delaney and explained the purpose of the CEI to him. He escorted me to a conference room, where we were joined by Mr. Eilers. I conducted an entry briefing there.

During the entry briefing, I presented my business card and EPA credentials to Mr. Delaney and Mr. Eilers. I explained the scope of the CEI and the data gathering procedures that would be employed (for example, interviews, visual inspection, records review, and digital photography). I then informed them of the facility's right to make confidentiality claims for any or all of the information obtained. I stated that at the conclusion of the CEI, they would be presented with a Confidentiality Notice (Notice) with which the facility could make or not make a claim of confidentiality for the facility. I also provided them 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.

A copy of each of the following documents was left with the facility during the inspection:

- RCRA Facility Access Information Sheet
- Mr. Trevor Urban's business card
- RCRA Section 3007
- U.S. Federal Codes 1001 and 1002
- Instructions for Responding to a Notice of Preliminary Findings
- Notice Regarding Proprietary/Confidential Business Information
- Managing your Hazardous Waste: A Guide for Small Businesses
- U.S. EPA Small Business Resources Information Sheet
- Industry Sector Notebooks
- Environmental Compliance Assistance Centers
- 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
- Universal Wastes – Including Aerosol Cans
- RCRA Online: A Quick Reference Guide
- Part 279 Requirements: Used Oil Management Standards
- EPA Region 7 Emergency Response Program
- Commercial Motor Vehicle Transportation System Security and Safety
- Security Awareness
- Chemical Facility Anti-Terrorism Standards

I reviewed the Hazardous Waste Site Info Verification Report (Verification Report) with Mr. Delaney (Attachment 1). Based on this review and observations during the CEI, I added

small quantity handler (SQH) of universal waste and used oil generator to the Type(s) of Regulated Activity section of the report. I also added the D018 hazardous waste code and removed the D005, D006, D007, D008, D027, D039, D040, U077, and U228 waste codes.

I conducted the visual inspection of the facility, accompanied by Mr. Delaney and Mr. Eilers. I reviewed available facility records, including manifests with land disposal restriction (LDR) notifications, waste profile and analytical testing records, safety data sheets (SDS), inspection records, emergency procedures documentation, and other documentation related to waste generation and management. Facility information gathered during the CEI is documented on the Data Gathering Worksheets and Checklists (Attachment 2).

At the conclusion of the CEI, I conducted an exit briefing with Mr. Delaney and Mr. Eilers. During the exit briefing, I provided a Receipt for Documents and Samples, which Mr. Delaney signed, acknowledging receipt (Attachment 3). I provided Mr. Delaney the Notice, which he signed indicating no confidential business information had been provided (Attachment 4). I also provided Mr. Delaney a Notice of Preliminary Findings (NOPF), which he signed to acknowledge receipt (Attachment 5).

A facility map obtained during the CEI is included in Attachment 6. An aerial photograph of the facility was downloaded after the CEI and is included in Attachment 7. The 48 photographs taken during the CEI are included in Attachment 8.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

Norplex manufactures a variety of industrial-grade laminates. Paper, fiberglass sheeting, or cloth (cotton, linen, or glass) are used as base materials to produce a laminated product. The raw material is impregnated with a phenolic or epoxy resin and finished with melamine or other surface coatings. The facility also manufactures laminated surfaces using polymer filament deposited in layers. Raw materials used by Norplex also include solvents, pigments, resins, and other polymers. The facility began operations at this location in approximately 1975.

Norplex currently employs approximately 180 full-time staff, working three 8-hour shifts covering 24 hours, Monday through Friday. Norplex occupies a main building and three large storage outbuildings with a total of approximately 150,000 square feet under roof.

Norplex uses dozens of formulations of laminating polymers. Raw materials are mixed in compounding kitchens, then piped to a treatment line. The treaters are used to impregnate sheets of paper, cotton, linen, or glass cloth. The sheets are layered, pressed in a series of rollers, and baked in an oven. According to Mr. Delaney, the polymer is recirculated through the treaters, and fresh material is added as it is consumed by the impregnating process. When the run is concluded, any remaining polymer (“scrap”) is pumped out into a 55-gallon container (drum). The pan and other equipment are typically cleaned with acetone, although methyl ethyl ketone (MEK) is sometimes used. Melamine treaters are cleaned with hot water. This spent solvent or wash water (“wash”) is also pumped out into a drum. The melamine scrap and wash are considered hazardous based on process and product knowledge and testing; these are managed as

a single waste stream (melamine waste). All other scrap (phenolic epoxy or anhydride scrap) is considered hazardous based on process and product knowledge. For the purposes of this report, both phenolic epoxy and anhydride scrap are described as phenolic epoxy scrap. Wiping and cleaning equipment also generates waste rags, which the facility considers hazardous based on process and product knowledge. Cutting and shaping the finished product generates waste laminate, which is considered nonhazardous based on product and process knowledge and is consolidated with the general trash.

Since the last inspection, the facility has also added a process to generate laminated surfaces by depositing polymer filaments in layers around a form. Acetone is also used to clean equipment from in this process. Because of the polymers used during the process, both the scrap and the wash generated during this process are considered hazardous waste based on process and product knowledge and cannot be reclaimed on site.

The used wash solvent is classified, based on its formulation, into one of two categories: (1) "in-process materials" that can be reclaimed in an on-site distillation unit (still) (Attachment 8, Photograph 31) or (2) waste, which is consolidated with the phenolic epoxy scrap. Whether the material can be reclaimed depends on the viscosity of the material and the ease with which it can be distilled. Used solvent designated for reclamation is accumulated in containers in operational areas around the facility. The facility considers this used solvent a hazardous secondary material (HSM) exempt from the definition of solid waste (Section 3). The still bottoms generated during the reclamation process are considered hazardous waste based on product and process knowledge.

The facility also grinds finished laminated tubes to meet customer requirements. The facility's air permit requires that the grinding operation be a wet operation. The facility pretreats wastewater to remove solids, then discharges the water to the City of Postville publicly owned treatment works (POTW) from two discharge points. The particulate matter generated is filtered out of the wastewater through a press which generates filter cake. The filter cake is considered nonhazardous waste based on product and process knowledge and on testing. The discharged wastewater is considered exempt from the definition of solid waste per Title 40 *Code of Federal Regulations* (40 CFR) 261.4(a)(1)(ii).

The facility also has an on-site laboratory; this is used both for research and development (R&D) and quality control (QC). Activities in the laboratory also generate phenolic epoxy scrap and waste rags, which are consolidated with the similar wastes from the production areas. Disposal of off-specification chemicals or used reagents generates lab pack waste, which the facility considers hazardous based on process and product knowledge.

The facility does not maintain any vehicles on site, including the facility's forklifts and forktrucks, which are maintained by an off-site contractor. Maintenance of the hydraulic rollers and presses generates used oil and used oil debris (filters, absorbent, and rags), which the facility considers nonhazardous and manages as used oil per 40 CFR 279. Off-specification or expired raw materials and waste aerosol cans are characterized as hazardous or nonhazardous based on product or process knowledge and disposed of accordingly. Maintenance of the facility building and equipment generates used batteries and lamps, both of which the facility manages as

universal waste, and general trash, which the facility considers exempt or nonhazardous waste streams. The facility also occasionally generates waste paint-related material (WPRM) from facility maintenance. I did not observe any WPRM during the inspection, and it is not discussed further in this report.

In August 2017, Booz Allen Hamilton, an EPA contractor, conducted a CEI at Norplex. During the CEI, the inspector made the following preliminary findings:

1. Failure to label satellite accumulation area (SAA) containers with an indication of the nature of the hazard
2. Failure to conduct annual refresher training regarding the contingency plan
3. Failure to prepare a written description of the type and amount of introductory and continuing education provided

None of these preliminary findings were repeated during this CEI.

2. RCRA Status

The Verification Report provided by EPA (Attachment 1) indicates that Norplex is a large quantity generator (LQG) generating more than 1,000 kilograms (kg) of hazardous waste per month. Based on my review of manifests, the 2021 Biennial Report (Attachment 9), and information provided by Mr. Delaney and Mr. Eilers, I concluded that Norplex is operating as a LQG of hazardous waste. Norplex currently generates approximately 10,000 kg per month of phenolic epoxy scrap (D001, D035, F003, F005) alone. The facility is also a used oil generator and a small quantity handler of universal waste (accumulating less than 5,000 kg of universal waste at any time). I confirmed each of these activities during the CEI.

3. Hazardous Secondary Materials

On February 7, 2022, Norplex re-notified Region 7 that it intended to claim the exemption to the definition of solid waste described in 40 CFR 261.4(a)(23). Norplex claimed this exemption for used solvent wash, a HSM that is identified as in-process material by the facility and reclaimed on site. Before the inspection, I reviewed the notification, which was available on the RCRAInfo database. I inspected the facility for the requirements for this exemption.

Used solvent wash generated from cleaning treater pans and equipment is reclaimed in a still operated by Norplex (Attachment 8, Photograph 31). As required, it is not burned, applied to the land, or otherwise used in a manner constituting disposal. Before reclamation, used solvent is held in containers that control the movement of the solvent into the environment (Attachment 8, Photographs 26 through 29, 33, and 39). The containers are closed and in good condition, and are labeled with their contents (“in-process material”).

The facility does not speculatively accumulate solvent for reclamation; and maintains a log of distillation runs, tracking the amount and type of solvent recovered (Attachment 10). In addition,

containers of in-process material are marked with an accumulation start date to track their age. During the inspection, I observed nine containers of in-process material. The oldest was dated May 13, 2022.

Each run begins with a 55-gallon container of used solvent wash. The reclaimed solvent is pumped from a 55-gallon container attached to the distillation unit into an aboveground accumulation tank in the still room (Attachment 8, Photograph 30). According to Mr. Delaney, all of the reclaimed solvent is used. Due to the relatively small amount of reclaimable solvent wash relative to the amount that must be discarded with scrap, the facility also uses virgin solvent. During the inspection, I reviewed the facility's documentation of legitimate recycling (Attachment 11).

Because the facility is an LQG and does not accumulate more than 6,000 kg of HSM at any time, the preparedness and prevention requirements for the exemption are met through the facility's compliance with 40 CFR Subpart M. Section 8 includes a description of the facility's preparedness and prevention activities and its contingency plan.

As a result of the inspection, it appears that the facility has met the requirements for the exemption in 40 CFR 261.4(a)(23). As a result, I did not inspect the in-process material as hazardous waste.

4. Waste Streams

This section of the CEI report describes waste streams generated by the facility, including the facility's waste determination and waste codes, generation process and rate, management at the facility, and ultimate disposition. The following discussion of waste streams is based on my interviews with Mr. Delaney and Mr. Eilers, the visual inspection, and my review of available documentation.

The visual inspection included the treater lines, maintenance areas, the primarily hazardous waste central accumulation area (HWCAA) in the lean-to, and the still room. The facility has five less-than-90-day HWCAAs: (1) near Treater 1 (location #14 on Attachment 6), (2) in the still room (location #13), (3) between Treaters 4 and 6 (location #11), (4) adjacent to Treater 6 (location #10), and (5) in the lean-to shed outbuilding (location #8). I also observed seven SAAs during the visual inspection and did not observe accumulation of more than 55 gallons of hazardous waste in any SAA. The locations of the SAAs are also shown on Attachment 6. Mr. Delaney and Mr. Eilers accompanied me throughout the visual inspection.

Phenolic epoxy scrap is generated when polymer pans and treater equipment is cleaned with solvent, both during and at the end of a production run. This waste stream includes all non-melamine scrap (phenolic epoxy scrap and anhydride scrap). The facility considers this material hazardous (D001, D035, F003, F005) based on product and process knowledge. Acetone is the primary solvent used by the facility for cleaning. In 2021, the facility generated approximately 10,000 kg of phenolic epoxy scrap per month (Attachment 9, Page 5). The scrap is transported to RINECO Chemical Industries (RINECO) in Benton, Arkansas for fuel blending. It was last collected on May 3, 2022 (Attachment 12, Pages 1 and 2).

During the inspection, I observed phenolic epoxy scrap in two containers in the product testing SAA in the QC laboratory (SAA #2) (Attachment 8, Photographs 2 through 4). Altogether, the two containers held approximately 2 gallons of waste. I also observed scrap in a 55-gallon SAA container in the upper compound SAA (SAA #9) (Attachment 8, Photograph 35). It held approximately 30 gallons of waste. All SAA containers of phenolic epoxy scrap were closed, labeled as "hazardous waste," marked with the nature of the hazard ("flammable"), and in good condition.

The two SAA containers in the upper compound SAA held phenolic epoxy scrap (55-gallon container) and waste rags (5-gallon container) (Attachment 8, Photographs 35 and 36). The total capacity of both containers was 60 gallons, although only 35 gallons were in accumulation at the time of the inspection. I provided compliance assistance regarding accumulation limits for SAA. Mr. Delaney and Mr. Eilers discussed the possibility of either moving one of the containers to make two separate SAAs or to develop a procedure to ensure that both containers together did not hold more than 55 gallons of hazardous waste.

I observed hazardous waste accumulation containers (HWACs) in all five of the HWCAAs:

- As many as 61 containers in the lean-to shed HWCAA (HWCAA #8) (Attachment 8, Photographs 16 and 32).
- Three containers in the still room (HWCAA #13) (Attachment 8, Photographs 25 and 26)
- Two containers in the Treater 1 HWCAA (HWCAA #14) (Attachment 8, Photographs 37 and 38)
- Two containers in the Treater 4-6 HWCAA (HWCAA #11) (Attachment 8, Photograph 33)
- One container in the Treater 6 HWCAA (HWCAA #10) (no photograph)

During the inventory of the lean-to shed HWCAA, I did not distinguish between containers of phenolic epoxy scrap and filament epoxy waste, although I did review every container in the HWCAA. However, based on the relative generation rate for the two waste streams, most of the containers were likely phenolic epoxy scrap. All containers were closed, in good condition, dated, labeled as "hazardous waste," and marked with the nature of the hazard ("flammable"). The oldest container of scrap (including both filament epoxy waste and phenolic epoxy scrap) was in the lean-to shed and was dated April 25, 2022.

I did not observe any deficiencies related to phenolic epoxy scrap.

Melamine waste is generated from disposal of spent melamine polymer, which cannot be reclaimed in the still, and the wash water used to clean the treater. The facility considers this material hazardous (D001, D035, F003, F005) based on product and process knowledge. Spent acetone and MEK is sometimes mixed into the waste. In 2021, the facility generated approximately 2,000 kg per month of melamine waste (Attachment 9, Page 5). It is transported to the RINECO facility in Benton, Arkansas, for fuel blending. It was last collected on May 3, 2022 (Attachment 12, Pages 1 and 2).

During the inspection, I observed melamine waste in one 55-gallon HWAC in the Treater 4-6 HWCAA (HWCAA #11) (Attachment 8, Photograph 33) and 16 HWACs in the lean-to shed HWCAA (HWCAA #8) (Attachment 8, Photographs 17 and 32). All containers were closed, in good condition, dated, and labeled as "hazardous waste," and marked with the nature of the hazard ("flammable"). The oldest container of melamine waste that I observed was in the lean-to shed and was dated April 25, 2022.

I did not observe any deficiencies related to melamine waste.

Waste rags are generated when rags are used to wipe down treaters after use, during maintenance and cleaning of equipment, and in the laboratory. The facility considers this material hazardous (D001, D018, D035, F003, F005) based on product and process knowledge. In 2021, the facility generated approximately 500 kg per month of waste rags (Attachment 9, Page 6). The used solvent rags are transported to the RINECO facility in Benton, Arkansas, for fuel blending. They were last collected on May 3, 2022 (Attachment 12, Pages 1 and 3)

I observed waste rags in the following SAAs:

- In the QC laboratory SAA (SAA #2), approximately 1 gallon (Attachment 8, Photograph 2)
- In the upper compound area (SAA #9), approximately 5 gallons (Attachment 8, Photograph 36)
- In the northern tubing rag SAA (SAA #5), approximately 30 gallons (Attachment 8, Photograph 8)
- In the southern tubing rag SAA (SAA #21), approximately 20 gallons (Attachment 8, Photograph 9)

The containers were closed, labeled as "hazardous waste," marked with the nature of the hazard ("flammable" or "ignitable"), and in good condition.

The two SAA containers in the upper compound SAA held phenolic epoxy scrap (55-gallon container) and waste rags (5-gallon container) (Attachment 8, Photographs 35 and 36). The total capacity of both containers was 60 gallons, although only 35 gallons were in accumulation at the time of the inspection. I provided compliance assistance regarding accumulation limits for SAA. Mr. Delaney and Mr. Eilers discussed the possibility of either moving one of the containers to make two separate SAAs or to develop a procedure to ensure that both containers together did not hold more than 55 gallons of hazardous waste.

I also observed waste rags in 55-gallon HWACs in three of the five HWCAAs:

- Nine containers in the lean shed HWCAA (HWCAA #8) (Attachment 8, Photographs 14 and 32).
- One container in the still room (HWCAA #13)(Attachment 8, Photograph 24)
- One container in the Treater 4-6 HWCAA (HWCAA #11) (Attachment 8, Photograph 33)

All containers were closed, in good condition, dated, labeled as "hazardous waste," and marked with the nature of the hazard ("flammable" or "ignitable"). The oldest container of waste rags that I observed was in the lean shed and was dated April 20, 2022.

I did not observe any deficiencies related to waste rags.

Filament epoxy waste is generated when equipment in the filament laminating area is cleaned. The facility considers this material hazardous (D001, D018, F003) based on product and process knowledge. Acetone is the solvent used by the facility for cleaning this equipment. In 2021, the facility generated approximately 350 kg of filament epoxy waste per month (Attachment 9, Page 9). The scrap is transported to RINECO in Benton, Arkansas for fuel blending. It was last collected on May 3, 2022 (Attachment 12, Pages 1 and 2).

I observed HWACs of this waste in the lean-to shed HWCAA (HWCAA #8) (Attachment 8, Photograph 32). During the inventory of the lean-to shed HWCAA, I did not distinguish between containers of phenolic epoxy scrap and filament epoxy waste. However, based on the relative generation rate for the two waste streams, most of the 61 containers I counted were likely phenolic epoxy scrap. All containers were closed, in good condition, dated, labeled as "hazardous waste," and marked with the nature of the hazard ("flammable"). The oldest container of scrap (including both filament epoxy waste and phenolic epoxy scrap) was in the lean-to shed and was dated April 25, 2022.

I did not observe any deficiencies related to filament epoxy waste.

Still bottoms are generated when solvent is reclaimed in the on-site distillation unit (the still). Any solid polymer material, such as particulate strained from raw materials or absorbent material swept up during spill cleanup, is also included in the still bottoms waste stream. The facility considers this material hazardous (D001, F003, F005) based on product and process knowledge. In 2021, the facility generated approximately 200 kg per month of still bottoms (Attachment 9, Page 6). The still bottoms are transported to the RINECO facility in Benton, Arkansas, for fuel blending. They were last collected on May 3, 2022 (Attachment 12, Pages 1 and 2).

During the inspection, I observed one 55-gallon HWAC of still bottoms in the still room (HWCAA #13) (Attachment 8, Photograph 23) and two containers in the lean-to shed HWCAA (HWCAA #8) (Attachment 8, Photographs 15 and 32). All containers were closed, in good condition, dated, labeled as "hazardous waste," and marked with the nature of the hazard ("flammable"). The oldest container of still bottoms that I observed was in the lean-to shed and was dated April 25, 2022.

I did not observe any deficiencies related to still bottoms.

Wastewater is generated during the laminate grinding process. The wastewater is discharged to the City of Postville POTW via the sanitary sewer from two discharge points. As a result, the facility considers wastewater to be exempt from the definition of solid waste per 40 CFR 261.4(a)(1)(ii). Based on the facility's wastewater permits (one for each discharge point), the average discharge rate for wastewater is approximately 36,000 gallons per day (Attachment 13).

Before discharge, the wastewater is disinfected and is treated to remove solids and volatile organic compounds. I did not observe any deficiencies related to wastewater during the CEI.

Filter cake consists of dewatered solids removed from wastewater by the filter press during pretreatment. The facility considers wastewater treatment sludge to be nonhazardous based on product and process knowledge and on testing (Attachment 14). Mr. Delaney estimated that the facility generates approximately 20 cubic yards of filter cake per month. It is accumulated in a 20-cubic-yard rolloff container for disposal at the Winneshiek County landfill in Decorah, Iowa (Attachment 8, Photographs 6 and 7). I did not observe any deficiencies related to filter cake during the CEI.

Lab pack waste is the spent reagents and off-specification chemicals generated in the facility's R&D and QC laboratory. In 2021, these wastes included spent solvents (F003 and F005), corrosives (D002), and ignitable waste (D001). In 2021, the facility generated approximately 40 kg total of hazardous lab pack waste (Attachment 9, Pages 7 and 8). In 2021, the waste was transported to Heritage Crystal Clean in Indianapolis, Indiana, and to Petro-Chem Processing Group (Petro-Chem) in Detroit, Michigan, for bulking or fuel blending.

During the inspection, I observed a tray of containers in the SAA adjacent to the QC laboratory (SAA #3) (Attachment 8, Photograph 1). This cabinet is used for storage of all chemicals used in the laboratory, including unused and in-use reagents. According to Mr. Delaney, the materials in the gray tray are evaluated every 6 months to determine if they can be repurposed for use elsewhere at the facility, for example to calibrate equipment or in the maintenance department, or if they are waste. If the materials cannot be reused, they are determined to be waste and the facility makes a hazardous waste determination on the materials.

I did not observe any deficiencies related to lab pack waste.

Off-specification materials are raw materials that cannot be used. The facility makes a waste determination on these materials based on product and process knowledge. Based on the Biennial Report, in 2021, these wastes included ignitable waste (D001), and the facility generated approximately 2,700 kg total of hazardous off-specification materials (Attachment 9, Page 9). The waste was transported to Petro-Chem in Detroit, Michigan, for bulking or fuel blending. It was last collected on May 24, 2022 (Attachment 12, Page 6). I did not observe any off-specification materials during the inspection, and I did not discuss procedures for waste determination or accumulation of off-specification materials.

Waste aerosol cans are generated during facility maintenance. The facility makes a waste determination on these materials based on product and process knowledge. In 2021, these wastes included ignitable waste (D001), and the facility generated approximately 330 kg total of waste aerosol cans (Attachment 9, Page 7). The waste was transported to Petro-Chem in Detroit, Michigan, for bulking. It was last collected on May 26, 2022 (Attachment 12, Page 5).

During my inspection, I observed waste aerosol cans in SAAs in the maintenance shop (SAA #18) and in the lean-to shed. In lean-to, hazardous waste aerosol cans were accumulated in four 5-gallon metal SAA containers, each approximately full (Attachment 8, Photograph 20).

This area also had a 2-gallon container of nonhazardous aerosol cans. In the maintenance shop, the cans were accumulated in a full 55-gallon SAA container (Attachment 8, Photograph 42). Containers in both SAAs were labeled as "hazardous waste," marked with the nature of the hazard ("flammable," "ignitable," or "toxic"), and in good condition. The containers in the lean-to were closed, but the container in the shop was not. I concluded that the facility had failed to keep a SAA container closed when it was not actively being filled, as required by 40 CFR 262.15(a)(4) (**NOPF No. 1**). I provided compliance assistance regarding management of waste in SAAs.

Used oil is generated during maintenance of the facility's hydraulic equipment. This facility manages it according to 40 CFR 279. I did not determine the generation rate for used oil. It is collected by Heritage Crystal Clean and transported to Des Moines, Iowa, for recycling. It was last collected on December 21, 2021, when 1,930 gallons of used oil was collected (Attachment 12, Page 8).

During the inspection, I observed used oil stored in two aboveground storage tanks in the boiler room (Attachment 8, Photographs 44 and 45). Both tanks were in good condition and labeled as "used oil." I also observed used oil storage containers in the water treatment plant, the compressor station, and the boiler room (Attachment 8, Photographs 5, 10, and 43). All were in good condition and labeled as "used oil."

I did not observe any deficiencies related to used oil.

Used oil debris is generated during maintenance of the facility's hydraulic equipment and includes filters, rags, and absorbent material. This facility manages this waste as used oil according to 40 CFR 279. I did not determine the generation rate for used oil debris. It is collected by Heritage Crystal Clean and transported to Des Moines, Iowa, for recycling. It was last collected on May 22, 2022, when 55 gallons of used oil filters were collected (Attachment 12, Page 4).

During the inspection, I observed two containers of used oil debris in the maintenance shop (Attachment 8, Photograph 41). Both were in good condition and labeled as "used oil."

I did not observe any deficiencies related to used oil debris.

Universal waste lamps are generated during facility maintenance. The facility uses both green-tipped and silver-tipped tube fluorescent lamps and high-intensity-discharge (HID) lamps. They are all managed as universal waste. According to Mr. Delaney, the facility has largely been retrofitted with light emitting diode (LED) lamps, which the facility considers nonhazardous based on the product safety documentation. The facility generates approximately 60 universal waste lamps per year, and these are collected for recycling two or three times a year by Retrofit Recycling of Owatonna, Minnesota. I did not determine the last time this waste was collected.

During the inspection, I observed universal waste lamps in the boiler room. I observed one container of 4-foot lamps and one container for 2-foot, U-shaped, and HID lamps (Attachment 8, Photographs 46 and 47). The smaller container was empty, and the larger container held

approximately 10 lamps. Both containers were closed, in good condition, and labeled as "universal waste lamp(s)," Both containers were dated, with the older being dated March 14, 2022. I also observed empty containers for universal waste lamps in the pole shed (Attachment 8, Photograph 11).

I did not observe any deficiencies related to universal waste lamps.

Universal waste batteries are generated during facility maintenance, including nickel-cadmium, lead-acid, lithium ion, and alkaline batteries. The facility manages all batteries as universal waste. The facility generates approximately 5 gallons of universal waste batteries per year, and these are collected for recycling by Retrofit Recycling of Owatonna, Minnesota. I did not determine the last time this waste was collected.

During the inspection, I observed used batteries in two locations—in the maintenance office and in the server room (Attachment 8, Photographs 40 and 48). Both containers were labeled as "universal waste batteries" and dated March 10, 2022. I estimated that the facility had approximately 10 gallons of batteries in storage at the time of the inspection.

I did not observe any deficiencies related to universal waste batteries.

General trash is generated from facility maintenance and cleaning. The facility considers the general facility trash nonhazardous based on product and process knowledge. General trash includes, but is not limited to, paper, food waste, packaging, and waste laminate. The general trash is collected in a rollaway container around the facility. I did not determine the generation rate for general trash. The general trash is accumulated in rollaway containers around the facility and transported for disposal to the Winneshiek County Sanitary Landfill in Decorah, Iowa.

5. Required Response Equipment and Hazard Management

Per 40 CFR 262.15(a)(8) and 262.17(a)(6), a LQG must operate to minimize the possibility of a fire, explosion, or spill, and must maintain emergency response equipment. During the visual inspection of the HWCAAs and SAAs, I observed telephones for summoning emergency assistance, emergency response materials and spill kits, and fire extinguishers. Examples of response equipment are shown in Attachment 8, Photographs 18, 19, 21, 22 and 34. Smoking is prohibited in all operational areas of the facility, and I observed warning signs around the facility including around all HWCAAs. Warning signs associated with the lean-to HWCAA are shown in Attachment 8, Photographs 12 and 13. I did not observe any deficiencies related to emergency response equipment during the inspection.

6. HWCAAs

I was accompanied by Mr. Delaney and Mr. Eilers to the five less-than-90-day HWCAAs. The primary HWCAA is located in the outbuilding called the lean-to shed. The other four HWCAAs are in the south end of the main building (called the manufacturing HWCAAs here) (see Attachment 6). The facility inspects five HWCAAs as part of a program of weekly inspection and maintains logs of its inspections (Attachment 15). I reviewed 3 years of these logs and did not observe any gaps of more than 1 week.

The lean-to shed HWCAA (HWCAA #8) had 88 full 55-gallon containers of waste, including:

- 61 containers of phenolic epoxy scrap and filament epoxy waste (undifferentiated)
- 16 containers of melamine waste
- Two containers of still bottoms
- Nine containers of waste rags.

The oldest container I observed in this HWCAA was a container of waste rags dated April 20, 2022. The containers had adequate aisle space to observe container condition, and all containers were turned with their labels facing out.

The maintenance HWCAAs had the following containers in storage:

HWCAA	Wastes Stored	Oldest Container
Treater 1 (HWCAA #14)	• One container of phenolic epoxy scrap	June 8, 2022
Still Room (HWCAA #13)	• Three containers of phenolic epoxy scrap • One containers of waste rags • One container of still bottoms	June 7, 2022 (waste rags)
Treater 4-6 (HWCAA #11)	• Two containers of phenolic epoxy scrap • One container of waste rags • One container of melamine waste	May 25, 2022 (phenolic epoxy scrap)
Treater 6 (HWCAA #10)	• One container of phenolic epoxy scrap	June 10, 2022

I did not observe any deficiencies related to the HWCAAs.

7. Manifests and Biennial Report

During the CEI, I reviewed the approximately 20 of the approximately 40 manifests and LDR notifications generated in the previous three years. I verified that the facility had copies of manifests for 3 years. Copies of manifests are included in Attachment 12. The Hazardous Waste Biennial Report for 2021 was submitted in February 2022, and I obtained a copy during the inspection (Attachment 9).

I did not observe any deficiencies related to manifests or reporting.

8. Preparedness and Prevention and Contingency Plan

LQG facilities are required by 40 CFR 262.17(a)(6) to meet the emergency preparedness, prevention, and procedures requirements outlined in 40 CFR 262 Subpart M, including preparation of a RCRA contingency plan and documented arrangements with response agencies. During the CEI, I reviewed the facility's RCRA contingency plan (Attachment 16) and its associated quick reference guide (QRG) (Attachment 17). During my review, I observed that the

plan had most recently been updated on February 14, 2022. During my review, I concluded that the contingency plan and QRG had all elements required by 40 CFR 262 Subpart M.

Based on the RCRA contingency plan, Mr. Eilers is the primary emergency coordinator (EC), with alternate ECs assigned to each shift. According to Mr. Delaney, these ECs and their contact info is up to date.

I did not observe any deficiencies regarding the facility's RCRA contingency plan or preparedness and prevention program.

9. Personnel Training Requirements

Personnel training is required by LQG regulations specified in 40 CFR 262.17(a)(7) to ensure that employees are thoroughly familiar with proper waste handling procedures relevant to their responsibilities. Norplex provides training covering hazardous waste awareness, management, and labeling to relevant administration, engineering, and maintenance staff. Norplex also provides training to all employees on emergency response procedures and responsibilities. These trainings are provided as part of an employee's initial training and annually thereafter. The job descriptions provided by Mr. Delaney included a description of duties, education, skills, and qualifications, and those descriptions included the ECs. An example job description is in Attachment 18.

According to Mr. Delaney, the training is provided by either him or Mr. Eilers, and they receive annual training from Lion Environmental. I reviewed the training documentation and confirmed that ECs, personnel who conducted inspections, and personnel who signed manifests had received annual refresher training in 2019, 2020, and 2021. A copy of the training tracking log for 2020 is included in Attachment 19.

I did not observe any deficiencies related to personnel training.

10. Air Emissions: 40 CFR Part 265 Subparts AA, BB, CC

EPA regulations in 40 CFR Part 265, Subparts AA, BB, and CC apply to LQGs. If a LQG manages hazardous waste with an organic concentration greater than 10 parts per million by weight (ppmw), the standards found in Subpart AA apply to hazardous waste air emissions from certain process vents. A process vent used in distillation, fractionation, solvent extraction, thin-film evaporation, air stripping, or steam stripping is regulated by Subpart AA. Norplex is not subject to the Subpart AA regulations because the distillation units are exempt recycling units.

If a LQG has equipment that contains or contacts hazardous waste composed of 10 percent or greater organics by weight, the facility is subject to Subpart BB standards for inspection and monitoring of the equipment. Norplex is not subject to the Subpart BB regulations because it does not have equipment that contains or comes in contact with hazardous waste.

The standards found in Subpart CC apply to LQGs that manage hazardous waste in containers with volatile organic compounds (VOC) concentration that exceeds 500 ppmw. The Subpart CC standards are applicable at Norplex because the facility accumulates hazardous waste that

contains VOCs in containers larger than 26 gallons in capacity. During the CEI, I determined that the facility complies with the Subpart CC requirements for 55-gallon containers by using Container Level 1 controls (containers smaller than 122 gallons that are U.S. Department of Transportation [DOT]-approved). I did not observe any deficiencies related to the Subpart CC air emissions requirements during the inspection.

11. Summary of Preliminary Findings

In summary, as part of the CEI, I found that the facility had failed to keep a SAA container closed when it was not actively being filled, as required by 40 CFR 262.15(a)(4) (**NOPF No. 1**).

Other than items specifically noted in the narrative, I observed no additional issues. However, further review by EPA may change or add to my findings.

Digitally signed by Heather Wood
Date: 2022.08.08 13:20:35 -05'00'

_____ Date: _____

Heather K. Wood
Inspector, Tetra Tech Inc.

AMBER WHISNANT Digitally signed by AMBER WHISNANT
Date: 2022.08.09 17:26:26 -05'00'

_____ Date: _____

Amber Whisnant
Section Chief, ECAD/CB/RCRA

Attachments:

1. Hazardous Waste Site Info Verification Report (2 Pages)
2. Data Gathering Worksheets and Checklists (52 Pages)
3. Receipt for Documents and Samples (1 Page)
4. Confidentiality Notice (1 Page)
5. Notice of Preliminary Findings (1 Page)
6. Map of Facility (1 Page)
7. Aerial Image of the Facility (1 Page)
8. Photographic Documentation (Photolog and 48 Images) (29 Pages)
9. 2021 Biennial Report (11 Pages)
10. Still Log (1 Page)
11. Documentation of Legitimacy of Recycling (4 Pages)
12. Manifests and Shipping Receipts (8 Pages)
13. Wastewater Permits (8 Pages)
14. Filter Cake Analysis (11 Pages)
15. Inspection Log (2 Pages)
16. Contingency Plan (11 Pages)
17. Quick Reference Guide (5 Pages)
18. Job Descriptions (3 Pages)
19. Training Log (1 Page)

NOTICE OF PRELIMINARY FINDINGS

FACILITY NAME: INDUSTRIAL LAMINATES/NORPLEX INC.
ADDRESS: 665 LYBRAND ST
POSTVILLE IA 52162
EPA ID NUMBER: IAD073489288 **DATE:** 6/14/22

NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and making the determinations as to what violations may have occurred at your facility.

1. FAILURE TO CLOSE SATELLITE ACCUMULATION AREA CONTAINER (40 CFR 262.15(a)(4))
2.
3.
4.
5.
6.
7.

If you have any questions regarding these findings please contact TREVOR URBAN, EPA REGION 7

The undersigned person hereby acknowledges receipt of a copy of this document and has read the same.

PRINTED NAME: Timothy Delaney **TITLE:** Env. Tech. Safety Mgr.

SIGNATURE:

This document was prepared by HEATHER K. WOOD