

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

TruStile Doors Iowa LLC
100 Enterprise Drive
Northwood, Iowa 50459
(720) 746-5434

EPA ID Number: IAD980739981

On

December 1, 2021

By

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 7
Enforcement and Compliance Assurance Division (ECAD)

1.0 INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division, I conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at TruStile Doors Iowa LLC (TruStile) located in Northwood, Iowa, on December 1, 2021. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. During the CEI, I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. The inspection report and attachments present the results of the CEI.

2.0 PARTICIPANTS

TruStile:

Andy Grunhovd, Environmental, Health and Safety (EHS) Manager, approximately two years with the company.

Paul Quintero, Maintenance Manager, approximately six years with the company.

Kris Pierce, Plant Manager, approximately two years with the company.

Mike Whisker, Senior EHS Manager, approximately two and one-half years with the company (teleconference from Denver during the exit briefing).

U.S. Environmental Protection Agency (EPA):

H. D. "Doug" Bryant, CPP, PCI, Civil Investigator, NOWCC/SEE, ECAD/Chemical Branch/RCRA Section

3.0 INSPECTION PROCEDURES

Due to the COVID-19 pandemic, I contacted the facility via telephone November 19, 2021, prior to the intended onsite inspection. The purpose of the initial contact was to identify the appropriate facility representative, ensure the representative would be available during the CEI, and to discuss protocols, procedures, and other requirements adopted by the facility to mitigate the spread of COVID-19.

Prior to beginning the inspection, I conducted a visual reconnaissance of TruStile on November 30, 2021, searching for areas of concern observable from the adjacent roadway. No environmental issues or areas of concern were observed during this preliminary examination.

I arrived at TruStile at approximately 0830 hours, December 1, 2021. I entered a lobby featuring an administrative kiosk staffed by a receptionist. I was asked to sign a visitor log and read a plant safety brochure. The receptionist summoned Mr. Grunhovd, identified as the facility contact. Mr. Grunhovd emerged from a nearby hallway and greeted me in the lobby area. We proceeded to a large conference room that was used throughout this inspection.

I presented my EPA credentials, and Mr. Grunhovd and I exchanged business cards (Attachment 1). Mr. Grunhovd participated throughout all facets of the CEI.

I next presented Mr. Grunhovd a copy of RCRA section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented him a copy of Title 18 U.S. Code, Sections 1001 and 1002. He was made aware of his confidentiality rights and was informed that a Confidentiality Notice would be provided at the end of the inspection to make or not to make any claims. Mr. Grunhovd acted as the official facility representative during the inspection; Mr. Pierce acknowledged receipt of documentation provided during the exit briefing.

The inspection consisted of an entry briefing, a discussion of facility operations, waste generation and waste management, a review of waste management records, emergency preparedness and planning, and a visual inspection of the waste generation and management areas. I was provided a site map and diagram of the facility (Attachment 2).

Document photocopies and 16 photographs were collected as inspection documentation (Attachments 1-33). Information collected during the CEI was recorded on a checklist and in field notes which are referenced in the report. I followed the inspection procedures discussed in the RCRA Compliance Evaluation Inspection Standard Operating Procedure (No. 2321.1C), unless noted differently.

At the conclusion of the inspection, I conducted an exit briefing, during which I summarized my findings and recommendations with Messrs. Pierce, Grunhovd and Whiskers. Messrs. Pierce and Grunhovd were present in the conference room for the exit

briefing and Mr. Whiskers participated via teleconference from his office located in Denver, Colorado. I provided Mr. Pierce a *Confidentiality Notice*, which he signed, indicating no confidentiality claims were made by the facility (see Attachment 3). I provided Mr. Pierce a *Receipt of Documents and Samples* and *Notice of Preliminary Findings* which he signed acknowledging receipt (Attachments 4 and 5 respectively).

The following inspection documents and compliance assistance handouts were left with the facility:

Section 3007 Inspections Sheet (EPA Handout)
RCRA Facility Access Information Sheet (EPA Handout)
United States Code Annotated (EPA Handout)
Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections (EPA Handout)
Notice of Preliminary Findings (EPA Handout)
Instructions for Responding to a Notice of Preliminary Findings (NOPF) (Reverse of NOPF)
U.S. EPA Small Business Resource Information Sheet (EPA Handout)
Solvent-Contaminated Wipes Final Rule Chart (EPA Handout)
Lead-Based Paint Activities (IDNR Handout)
Excluded Solvent-Contaminated Wipe Rule (IDNR Handout)
Battery Recycling/Disposal (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)
Emergency Response Program (EPA Handout)
Security Awareness (EPA Handout)
Managing Your Hazardous Waste: A Guide for Small Business (EPA Handout)

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

The TruStile facility has operated at this location since 2003, when it was owned by Woodharbor. TruStile employs approximately 190 personnel, working from 06:00-16:30, Monday through Thursday. Fridays are worked during these hours as business requires. TruStile operates in a building with approximately 160,000 square feet under roof. The facility is divided into ten different functional areas: lumber prep mill, panel processing, style and rail, assembly, machining, final assembly, finishing, shipping, maintenance, and administrative office. The North American Industry Classification System (NAICS) code for this facility is 321911 – Wood Window and Door Manufacturing.

TruStile cuts, assembles, sands, and coats wooden doors. Raw materials include wood,

coating materials (e.g., primers, stains, paints, and finishes), adhesives, and solvents.

TruStile receives wood, which is cut to size and proceeds through knife planing and a molder in the Lumber Prep Mill. Wastes generated in the Lumber Prep Mill include sawdust and wood chips. Sawdust is collected through a sawdust collection system, using vacuum suction through duct work, to one of three baghouses. Scrap wood is collected and transferred to a grinder, where it is ground into sawdust. The sawdust from baghouses and the grinder is transferred to a clam shell storage container, loaded onto a trailer, and shipped to Koster Grain, Carroll, Iowa, for animal bedding.

Wood parts from the Lumber Prep Mill are loaded onto carts and taken to the Panel Process or Style and Rail Process areas. In the Panel Process area, solid panels from the Lumber Prep Mill and/or purchased plywood are cut to size, receive a machined profile, and are then placed on a job cart for transfer to Assembly. In the Style and Rail Process, wood parts from the Lumber Prep Mill are cut to size, receive a machined profile, and then placed on a job cart and transferred to Assembly. Wastes from the Panel Process and Style and Rail Process include sawdust and wood chips.

In the Assembly area, wood parts from the Panel Process and Style and Rail Process are placed into a machine that glues and presses the parts together. Once assembled, parts transfer via a conveyor belt to a sander and trim line, which trims the sides of the parts. Wastes from the assembly process include sawdust and waste glue. Waste glue has been determined to be non-RCRA waste. The machine used in assembly is cleaned at the end of each shift. Liquid glue from rollers is transferred to a container for re-use. The rollers are cleaned with sawdust and water, with the waste containerized. The glue roller waste and sawdust are disposed in the general trash.

Assembled parts are transferred to the Machining area, where the holes for door handles and notches for hinges are cut. Wastes from the Machining area include sawdust and wood chips. After Machining, approximately 70 percent (%) of the parts are transferred to Final Assembly. At Final Assembly, these parts receive a finish sanding and hinges are installed prior to packaging and shipment to customers. Wastes from the Final Assembly include sawdust and packaging waste.

The remaining parts from Machining (approximately 30%) proceed to a hand sanding process prior to Finishing. In Finishing, parts are transferred to a paint booth where they are primed and painted or stained. Approximately five minutes after the finish coat, the parts are placed into a prime heat oven. Air movement aids in the drying process. After approximately five minutes in the prime heat oven, the parts are transferred to a job cart and proceed to the Final Assembly Process. Wastes from the Finishing process include spent solvent, waste stain, spent paint booth filters, waste paint booth paper, and waste water-based primer.

Spent solvent is managed as D001 characteristic and F003 listed HW. Spent paint booth

filters and waste paint booth paper have been determined to be non-RCRA hazardous waste and are transported to the North Iowa Landfill. Water-based primer waste has been determined to be non-RCRA hazardous and is discharged to the City of Northwood sanitary sewer system.

Compressor maintenance, machinery preventive maintenance activities, and fork truck maintenance generate used oil and used oil filters. Fork trucks are maintained by MH Equipment (MH), 4042 S. Federal Avenue, Mason City, Iowa. The used oil and used oil filters generated by MH technicians are collected by TruStile. The used oil is collected in 55-gallon containers, picked up and transported off-site to WRR for recycling. The used oil filters are hot drained, crushed, and disposed as scrap metal for recycling. Scrap metal consists of empty paint containers, punctured and drained aerosol cans, banding from incoming lumber shipments, discarded job carts, and other facility equipment. Scrap metal is picked up and transported to Buck's Recycling, 1541 Highway 9, Manly, Iowa, for recycling.

UW batteries are collected in five-gallon containers and shipped to Retrofit Recycling (Retrofit), Owatonna, Minnesota, for recycling. Electronic waste (e-waste) generated within the facility is shipped to Retrofit for recycling.

RCRA-empty spent aerosol cans generated within the facility are punctured using an aerosol can puncturing device. The punctured, RCRA-empty aerosol cans are managed as scrap metal.

TruStile uses a parts washer in the maintenance shop. The spent solvent from the parts washer is managed as D001 characteristic HW and is combined with the spent solvent waste managed as HW.

Cloth shop rags are managed as solvent-contaminated wipes and are picked up and laundered by Cintas Uniform Services, 203 9th Street, Charles City, Iowa.

4.2 RCRA Status

TruStile was previously inspected May 6, 2013 for RCRA compliance as a small quantity generator (SQG) of HW. Findings documented during that inspection are described below in section 5.0 Summary section of this report. The facility notified the EPA on August 2, 2021, that it is a large quantity generator (LQG) of D001, D006, D035, D039 characteristic and F003 listed HW (Attachment 6). The facility has converted lighting to light emitting diode (LED) fixtures throughout the administrative office and plant operations areas. TruStile manages spent batteries as UW, therefore I inspected TruStile as a small quantity handler of universal waste (SQHUW). TruStile generates used oil and used oil filters while performing routine preventive maintenance activities.

4.3 Facility Waste Streams and Management

TruStile has contracted Barton Solvents, Inc. (Barton) (IAD981719909), 1970 NE Broadway, Des Moines, Iowa, to assist in HW management. HW shipments are picked up and transported by Barton and/or Coal City Cob Company, Inc. (TXR000079839), 4300 N Interstate 35 E. Road, Waxahachie, Texas. The designated facility receiving HW for fuel blending is WRR Environmental Services (WRR)(WID990829475), 5200 Ryder Road, Eau Claire, Wisconsin.

The following waste streams are managed by TruStile:

Mr. Grunhovd explained that TruStile operates five paint booths. Each booth is outfitted with two sets of hoses, paint guns, and waste disposal containers for water-based and solvent-based coating products. He stated that acetone is used to clean the paint guns and hoses used with all coating products. The paint related wastes and waste solvent are combined in the waste disposal containers and are managed as HW. He stated that the majority of products are coated using solvent-based products.

Waste Water-Based Coatings: Mr. Grunhovd stated that TruStile uses water-based coating products for some of their products. The water-based primer is described in Attachment 7. The water-based stain base is described in Attachment 8. An exterior water-based satin top coat is used with this stain base product, described in Attachment 9. According to Mr. Grunhovd, generation rates of this waste stream vary, based upon business production cycles. However, when the water-based coating products are used, TruStile generates approximately two-three gallons of waste water-based coatings daily. He added that the water-based coating waste stream is collected in a five-gallon container located inside the paint booth. This container is managed as a satellite accumulation area (SAA) of HW. The five-gallon container is transported from the paint booth to the HW central accumulation area (HWCAA), where it is emptied into a 55-gallon mixed paint-related and mixed waste solvent waste container. This is accomplished whenever the SAA container of HW is filled and/or at the end of each shift. He added that acetone described in Attachment 10 is used to clean the paint guns and lines and is collected in the SAA container of HW. This paint-related water-based coatings waste stream is managed as D001 and D035 characteristic and F003 listed HW. It should be noted that according to the acetone safety data sheet (SDS) (Attachment 10), Section 3, it contains 60-100 percent acetone, and the specific composition is a trade secret. However, in other sections it states is 100 percent acetone. Therefore, no additional follow-up was conducted at this time.

Waste Mixed Solvent: Mr. Grunhovd stated that the majority of TruStile products are coated using solvent-based coating products. The most commonly used stain base is described in Attachment 11. Common pigments used with this stain base product include black (Attachment 12), yellow (Attachment 13), and red (Attachment 14). Finish products applied over the base stain include products described in Attachments 15, 16, and 17. According to Mr. Grunhovd, generation rates of this waste stream vary, based upon business production cycles. The solvent-based waste is collected in a five-gallon container located inside the paint booth. This container is

managed as a satellite accumulation area (SAA) of HW. The five-gallon container is transported from the paint booth to the HW central accumulation area (HWCAA), where it is emptied into a 55-gallon mixed waste solvent waste container. This is accomplished whenever the SAA container of HW is filled and/or at the end of each shift. He added that acetone Attachment 10 is used to clean the paint guns and lines and is collected in the SAA container of HW. This waste stream of paint-related waste and mixed waste solvent is profiled as UN 1263, Waste Paint-Related Material, managed as D001 and D035 characteristic and F003 listed HW. Mr. Grunhovd stated that TruStile generates between 1,700 and 2,300 pounds of this mixed solvent waste stream monthly.

Spent Paint Booth Filters and Waste Paint Booth Paper: Mr. Grunhovd stated that TruStile generates approximately 700 pounds of spent paint booth filters and waste paint booth paper used to cover the non-filtered surfaces inside the paint booth monthly. He explained that this waste stream has been determined to be non-RCRA hazardous, by virtue of product and process knowledge. This waste stream was historically disposed under Special Waste Authorization (SWA) 17-SWA-04-03, which required TruStile to place this waste stream in a special plastic container segregated from general trash. The SWA was rescinded July 2015, as documented by Attachment 18. Mr. Grunhovd stated, however, TruStile continues to segregate spent paint booth filters and waste paint booth paper from the general trash. He stated that this waste stream is placed into plastic bags, weighed, and placed into a plastic container. The waste is picked up by Waste Management, 521 3rd Street NE, Mason City, Iowa, and transported off-site to the Landfill of North Iowa, 15942 Killdeer Avenue, Clear Lake, Iowa, for land disposal.

Cutting and Sanding Sawdust and Wood Chips: Mr. Grunhovd stated that TruStile has generated approximately 1,412.31 tons of waste sawdust and wood chips thus far in the 2021 calendar year (Attachment 19). The sawdust created from cutting and sanding wood products is collected in a baghouse filtration system. Wood chips are ground into sawdust and transferred to a clam shell container located outside the south side of the facility. The sawdust has been determined to be non-RCRA hazardous, by virtue of product and process knowledge. Truckloads of sawdust are picked up weekly and transported to Koster Grain, Inc., 17995 Iris Avenue, Carroll, Iowa, for use as animal bedding.

Cloth Shop Rags: Cloth shop rags are used throughout the facility for cleaning dirt, dust, grease, and fluids from products and manufacturing equipment and cleaning painting equipment. Mr. Quintero stated that TruStile generates approximately 2,000 cloth shop rags weekly. Mr. Grunhovd stated that the cloth shop rags are managed as solvent-contaminated wipes and are laundered and returned by CINTAS Uniform Services (CINTAS), 203 9th Street, Charles City, Iowa.

Waste Paper Disposable Wipes/Personal Protective Equipment (PPE): Waste paper disposable wipes are generated throughout the facility. The waste paper disposable wipes are used for cleaning wood products, work areas, and cleaning paint guns and

painting equipment. The wipes used to clean coating equipment are managed as solvent-contaminated wipes. The solvent-contaminated wipes are collected in closed, metal containers situated near the paint booths. Mr. Grunhovd estimated that TruStile generates between 500-1,000 waste paper disposable wipes weekly. He stated that Personal Protective Equipment (PPE) gloves have been determined to be non-RCRA hazardous by virtue of product and process knowledge, as documented by Attachment 34. The waste paper disposable wipes/PPE are disposed in the general trash in separate plastic bags.

General Trash: Mr. Grunhovd stated that TruStile generates approximately 3,000 pounds of general trash monthly. The general trash consists of waste office paper, lunch wastes, and miscellaneous packing materials. Mr. Grunhovd stated that the general trash has been determined to be non-RCRA hazardous, by virtue of product and process knowledge. The general trash is compacted on-site. The compacted general trash is picked up weekly by Waste Management and transported off-site to the Landfill of North Iowa for landfill disposal.

Waste Cardboard: Mr. Grunhovd stated that TruStile generates approximately 500 pounds of waste cardboard monthly. The waste cardboard has been determined to be non-RCRA hazardous, by virtue of product and process knowledge. The waste cardboard is compacted on site. The compacted cardboard is picked up and transported off-site by Waste Management for recycling.

Scrap Metal: Mr. Grunhovd stated that TruStile generates approximately two tons of scrap metal annually. The scrap metal has been determined to be non-RCRA hazardous, by virtue of product and process knowledge. The scrap metal is collected in a large roll-off container and is picked up and transported off-site periodically by Buck's Recycling, 1541 Highway 9, Manly, Iowa, for recycling.

UW Batteries: Mr. Grunhovd stated that TruStile generates approximately one five-gallon container of waste nickel-cadmium rechargeable batteries annually. The waste batteries are collected in a five-gallon container that is managed as UW. The UW-Batteries are shipped to The Retrofit Companies, Inc. (Retrofit), 1010 Hoffman Drive NW. Owatonna, Minnesota, for recycling.

Electronic Waste: Mr. Grunhovd stated that TruStile generates between 500-700 pounds of electronic waste (E-waste) annually. The E-waste is shipped to Retrofit for recycling.

Used Oil: Mr. Grunhovd stated that TruStile generates approximately 55-gallons of used oil annually. The used oil is generated by preventive maintenance of manufacturing equipment and fork trucks. The used oil is picked up and transported off-site by Barton for recycling.

Used Oil Filters: Mr. Grunhovd stated that approximately seven used oil filters are generated annually during fork truck maintenance activities. The used oil filters are

hot drained, crushed in the maintenance area, and managed as scrap metal. The used oil is collected in a container and poured into a 55-gallon drum. The scrap metal is picked up by Buck's for recycling.

Waste Aerosol Cans: Mr. Grunhovd stated that TruStile generates approximately 10-15 RCRA-empty waste aerosol cans monthly. The waste aerosol cans are punctured using an aerosol can puncture unit. Any liquid generated by puncturing the waste aerosol cans is collected in a 55-gallon drum and managed as D001 HW. The punctured waste aerosol cans are managed as scrap metal.

Waste Glue and Adhesives: Mr. Grunhovd stated that TruStile generates approximately 350 gallons of waste glue and adhesives annually. The glue product used by TruStile is described in Attachment 20. Mr. Grunhovd stated that this waste stream has been determined to be non-RCRA hazardous, by virtue of product and process knowledge. Mr. Grunhovd provided copies of correspondence between the city of Northwood, Iowa and TruStile regarding the discharge of diluted waste glue and adhesives to the sanitary sewer system (Attachments 21 and 22). Hardened glue, typically mixed with sawdust, is disposed in general trash.

Waste Parts Washer Solvent: Mr. Quintero stated that TruStile generates approximately 30 gallons of waste parts washer solvent every two-three years. Solvent product used by TruStile is described in Attachment 23. Mr. Grunhovd stated that the waste parts washer solvent is managed as D001 characteristic HW. It should be noted that according to mineral spirits SDS (Attachment 23), Section 3, it contains 60-100 percent solvent naphtha (petroleum), medium aliphatic and the specific percentage of composition is a trade secret, although in Section 13 it states that it would be a D001 HW. Therefore, no additional follow-up was conducted at this time. The waste solvent is combined with the paint related waste and solvent discussed above.

4.4 Visual Inspection of Facility Waste Stream Management

A visual inspection of the facility was conducted to observe waste stream management practices and document regulatory compliance. Photographs, checklists, and field notes were used to document observations made during the visual inspection. A Photo Log was created, and photos taken during the inspection appear in Attachment 33.

I observed five paint booths that were used to coat the wooden door products manufactured by TruStile. Mr. Grunhovd stated that TruStile typically operated three paint booths at the same time, depending upon business cycles. Coating operations were not being performed in the paint booths at the time of this inspection.

A typical paint booth is pictured in Photo 1 and Attachment 2. The paint booth shows paint booth filters mounted to the rear wall and paper deployed on the floor and sides to collect overspray. Each paint booth was outfitted with five-gallon containers used to collect paint-related waste and waste solvent (Photo 2 and Attachment 2). All of the

containers were closed, labeled as HAZARDOUS WASTE, displayed a pictogram describing the nature of the HW contents, and were empty. I observed containers designated for solvent-contaminated wipes (Photo 3 and Attachment 2) in each of the paint booths. I observed closed metal containers earmarked for paint-related solids, e.g., PPE and waste paper disposable wipes, similar to the container pictured in (Photos 4 and 5 and Attachment 2) located near the paint booths.

I inspected the HW central accumulation area (HWCAA) that is located inside the Pump Room and the Storage Room (Attachment 2). I observed one 55-gallon accumulation drum, less than $\frac{3}{4}$ -full of paint-related and waste-mixed solvent HW, located inside the Pump Room. The drum was labeled HAZARDOUS WASTE, bore a pictogram describing the nature of the contents of the drum, bore a description of the EPA waste codes, and had an **OPEN funnel** affixed to the top of the drum screwed into a bung portal (Photo 6 and Attachment 2). A close-up photo of the **OPEN funnel** is shown in Photo 7 and Attachment 2. **TruStile must keep containers of HW closed in accordance with the provisions of 40 CFR §262.17(a)(1)(iv)(A), NOPF No. 2.**

I observed an HW Emergency Quick Reference guide posted on the wall, adjacent to the aforementioned 55-gallon drum containing HW and next to the entrance to the Pump Room (Photo 8 and Attachment 2). Content of the Quick Reference guide is discussed below in Section 4.5.

I observed one full 55-gallon drum labeled as USED OIL staged for pick-up stored inside the HWCAA as shown in Photo 9 and Attachment 2. I also observed one closed, full, 55-gallon drum of waste mixed solvent, labeled HAZARDOUS WASTE, shown in Photo 10 and Attachment 2. The drum displayed a pictogram identifying the nature of the drum's contents. The drum was dated "11/16/2021" and displayed the EPA waste codes D001, D035, and F003.

TruStile policy did not permit personal cell phones inside the HWCAA. I did not observe a telephone inside the HWCAA. I asked Mr. Grunhovd where communication equipment was located that was immediately accessible when HW was being handled inside the HWCAA. He responded that there was a phone located at a Supervisor's desk, located outside the HWCAA, and noted on Attachment 2. The communications equipment was not immediately accessible to personnel handling HW inside the HWCAA. I asked if employees worked alone inside the HWCAA. He stated that employees typically worked alone while conducting HW management activities inside the HWCAA. **TruStile must ensure that communication equipment is immediately accessible to personnel handling HW inside the HWCAA in accordance with the provisions of 40 CFR §262.17(a)(6) →262.254(a), NOPF No. 1.**

I observed a parts washer capable of holding approximately 30 gallons of solvent, located inside the Maintenance Shop shown in Photo 12 and Attachment 2. I lifted the lid of the parts washer and confirmed the pungent odor of solvent. Mr. Quintero was not sure when the solvent was last changed but added that the parts washer is not used

often. Mr. Grunhovd stated that when the parts washer solvent is no longer viable, the spent parts washer solvent is removed from the parts washer and is managed as D001 characteristic HW. When spent parts washer solvent is generated, it will be transported to the HWCAA and combined with the paint-related and solvent waste stream discussed above.

I observed a cart containing waste wood on the plant floor as shown in Photo 13 and Attachment 2. Mr. Grunhovd explained that the waste wood is moved to a large wood grinder located on the west side of the facility and shown in Photo 14 and Attachment 2. He added that the waste wood is ground into sawdust and transported to a clam shell container located outside the facility.

I observed the portals to a general trash compactor and a cardboard compactor as shown in Photo 15 and Attachment 2.

I observed a large roll-off bin containing scrap metal located outside the west side of the facility and shown in Photo 16 and Attachment 2.

4.4 Documentation

Prior to this CEI, I reviewed 38 electronic uniform hazardous waste manifests (UHW) spanning the period of July 18, 2018 to present. Additionally, I reviewed the following UHW while on site during this inspection:

DATE	UHW #	Description	Weight/Lbs	EPA Waste Codes
11/24/2021	015359936FLE	UN1263	2062.5	D001, D035, F003
10/21/2021	016157783FLE	UN1263	2187	D001, D035, F003
		Used Oil	423	Non-RCRA
9/15/2021	016155481FLE	UN1263	1731	D001, D035, F003
8/25/2021	016157457FLE	UN1263	1825	D001, D035, F003
7/21/2021	016159118FLE	UN1263	2274	D001, D035, F003
6/16/2021	016154187FLE	UN1263	2301	D001, D035, F003
5/19/2021	016153854FLE	UN1263	1867	D001, D035, F003
4/22/2021	015361351FLE	UN1263	2258	D001, D035, F003
3/17/2021	015358423FLE	UN1263	1752	D001, D035, F003
2/17/2021	015360709FLE	UN1263	1289	D001, D035, F003
1/27/2021	015362132FLE	UN1263	1776	D001, D035, F003
1/16/2020	013924911FLE	UN1263	1707	D001, D035, F003
2/19/2020	013925165FLE	UN1263	1676	D001, D035, F003
3/18/2020	014667959FLE	UN1263	1273	D001, D035, F003
4/15/2020	013732780FLE	UN1263	1661	D001, D035, F003
5/20/2020	013733164FLE	UN1263	1682	D001, D035, F003
		Used Oil	466	Non-RCRA
6/17/2020	014664770FLE	UN1263	1671	D001, D035, F003

Mr. Grunhovd provided manifests spanning the previous three years. I did not observe any discrepancies with the shipping documentation/manifests maintained by the facility.

4.5 Emergency Planning and Preparedness

I discussed emergency preparedness and prevention topics with Mr. Grunhovd. He stated that he was not aware of the requirement to make arrangements with local emergency health agencies. He added that he was familiar with arrangements made with law enforcement and emergency fire agencies, having served as a Worth County (Iowa) Deputy Sheriff for nearly nine years and fourteen years with the local volunteer fire department. **TruStile must make arrangements with ALL local emergency agencies in accordance the provisions of 40 CFR §262.17(a)(6) →262.256(a), NOPF No. 3.**

Mr. Grunhovd and I reviewed the undated TruStile contingency plan (Attachment 24). The plan does not describe the arrangements that have been made with local agencies, as appropriate. **TruStile must include a description of arrangements made with local emergency agencies as prescribed in 40 CFR §262.17(a)(6) →262.256(a), NOPF No. 4.**

Mr. Grunhovd and I reviewed the undated TruStile quick reference guide prepared for the facility (Attachment 25). Mr. Grunhovd stated that a copy of the quick reference guide had not been submitted to all emergency response agencies. **TruStile must prepare a quick reference guide and submit it to emergency response agencies in accordance with 40 CFR §262.17(a)(6) →262.261(c), NOPF No. 5.** I asked Mr. Grunhovd for a map showing where hazardous waste is generated or managed and access routes to these locations, as required in the quick reference guide. Mr. Grunhovd stated that this requirement was not adequately addressed in the TruStile quick reference guide. **TruStile must include a map showing where hazardous waste is generated r managed and access routes to these locations in accordance with 40 CFR §262.17(a)(6) →262.262(b)(4), NOPF No. 6.**

4.6 Personnel Training

Personnel training requirements designed to reduce the potential for mistakes and accidents that might threaten human health or the environment at LQG HW facilities are described in 40 CFR §262.17(a)(7)(i)(C). These personnel training requirements are prescribed to ensure that workers are adequately prepared to properly manage HW during normal operations and also respond to any emergencies. Additionally, the EPA has noted in guidance that training would be beneficial for personnel who:

- Complete and/or sign HW manifests,
- Manage HW in accumulation areas,
- Maintain HW inventories,
- Conduct daily or weekly inspections of HW accumulation areas, and
- Plan for or respond to HW emergencies.

Mr. Grunhovd stated that he trains TruStile HW personnel to perform their duties in a way

that ensures compliance with the personnel training requirements cited above. He added that he has received specialized firefighting and hazardous material operations training and he is comfortable in his role as an instructor.

I specifically asked Mr. Grunhovd about the role of Emergency Coordinators described in the undated TruStile Contingency/Emergency Action Plan (Attachment 24) and the undated Quick Reference Guide (Attachment 25). The Emergency Coordinators identified in Attachment 24 and 25 are not consistent: the EHS Manager, the Maintenance Manager, and the Plant Manager are identified as “Contingency Response Coordinators” in the undated Contingency Plan; while the Plant Manager, Maintenance Manager, EHS Manager, and the Senior Production Manager are identified as “Emergency Coordinators” in the undated Quick Reference Guide. I asked if all of the Emergency Coordinators have received required hazardous waste training for emergencies and contingencies.

Mr. Grunhovd responded that he has not provided specific HW training to all of the Emergency Coordinators. I failed to ask Mr. Grunhovd who has been trained. **TruStile must provide HW training to appropriate personnel that includes response to emergencies, implementation of contingency plan, use of alarms, waste feed cut-offs and other emergency equipment in accordance with 40 CFR §262.17(a)(7)(i)(C), NOPF No. 7.**

I asked Mr. Grunhovd if TruStile has a system implemented to track specific job titles and names of persons filling positions related to hazardous waste management, to which he responded negatively. **TruStile must track specific job titles and names of persons filling positions in accordance with 40 CFR §262.17(a)(7)(iv)(A), NOPF No. 8.**

Mr. Grunhovd stated that TruStile initially provided HW training to new employees within six months of employment and refreshes HW training annually. I asked Mr. Grunhovd if TruStile describes, in writing, skills, education or qualification, and duties associated with each job title. Mr. Grunhovd provided job descriptions for Finish 1 (Attachment 26), Finish 2 (Attachment 27), Production Senior Operator (Attachment 28), and the EHS Manager (Attachment 29). The Job Description for the EHS Manager does not mention any duties involving HW management, training, and/or emergency response. **TruStile must describe, in writing, skills, education or qualifications, and duties associated with each job title in accordance with 40 CFR §262.17(a)(7)(iv)(B), NOPF No. 9.**

Mr. Grunhovd stated that TruStile maintains documentation confirming training that has been completed, as documented by the attached training sign-up sheets (Attachments 30-32). Mr. Grunhovd stated that TruStile maintains training records of current and former employees for three years.

5.0 SUMMARY

The following findings were documented during the RCRA CEI previously conducted May 6, 2013 when the facility was inspected as a small quantity generator (SQG) of HW:

NOPF No. 1 – Failure to mark universal waste accumulation container with the words “universal waste-battery(ies)” or “waste battery(ies)” or “used

battery(ies)” [40 CFR §273.14(a)].

NOPF No. 2 – Failure to mark universal waste accumulation container with the words “universal waste-lamps” or “waste lamps” of “used lamps” [40 CFR §273.14(e)].

NOPF No. 3 – Failure to mark hazardous waste satellite accumulation container with the words “hazardous waste,” or other words to identify the contents of the container [40 CFR §262.34(c)(1)(ii)].

NOPF No. 4 – Failure to keep a hazardous waste satellite accumulation container closed [40 CFR §262.34(c)(1)(i) →264.173(a)].

NOPF No. 5- Failure to make a hazardous waste determination on aerosol can waste and waste acetone [40 CFR §262.11].

NOPF No. 6 – Failure to post the location of fire extinguishers and spill control equipment by a telephone [40 CFR §262.34(d)(5)(ii)(B)].

The following preliminary findings were documented during this CEI:

NOPF No. 1 - 40 CFR §262.17(a)(6) →262.254(a): No communication equipment immediately accessible when waste is being handled inside the HWCAA.

NOPF No. 2 - 40 CFR §262.17(a)(1)(iv)(A): One open 55-gallon container of HW located inside the HWCAA.

NOPF No. 3 - 40 CFR §262.17(a)(6) →262.256(a): Make arrangements with local emergency agencies.

NOPF No. 4 – 40 CFR §262.17(a)(6) →262.261(c): Include a description of arrangements with local emergency agencies in the contingency plan, as appropriate.

NOPF No. 5 – 40 CFR §262.17(a)(6) →262.262(b): Submit a quick reference guide to emergency response agencies.

NOPF No. 6 – 40 CFR §262.17(a)(6) →262.262(b)(4): Include a map showing where hazardous waste is generated or managed and access routes to these locations in the quick reference guide.

NOPF No. 7 – 40 CFR §262.17(a)(7)(i)(C): Include in hazardous waste

training for Emergency Coordinators: response to emergencies, implementation of contingency plan, use of alarms, waste feed cut-offs and other emergency equipment, as required.

NOPF No. 8 – 40 CFR §262.17(a)(7)(iv)(A): Track specific job titles and names of persons filling positions.

NOPF No. 9 – 40 CFR §262.17(a)(7)(iv)(B): Describe, in writing, skills, education or qualification, and duties associated with each job title.

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.

HURLEY BRYANT
(Affiliate)

Digitally signed by HURLEY
BRYANT (Affiliate)
Date: 2022.01.04 17:43:24 -06'00'

Date: 12/15/2021

H. D. "Doug" Bryant, CPP, PCI
Civil Investigator, NOWCC/SEE

AMBER WHISNANT

Digitally signed by AMBER
WHISNANT
Date: 2022.01.14 17:16:07 -06'00'

Date: _____

Amber Whisnant
Chief, RCRA Section, Chemical Branch
Enforcement and Compliance Assurance Division

Attachments:

- 1) Business Cards (1 page)
- 2) Site Map/Diagram (2 pages)
- 3) Confidentiality Notice (1 page)
- 4) Receipt of Document and Samples (1 page)
- 5) Notice of Preliminary Findings (NOPF) (3 pages)
- 6) Hazardous Waste Site Info Verification Report for Inspector (1 page)
- 7) Product Description, Aquaprime® WB Pigmented Primer (2 pages)
- 8) Safety Data Sheet (SDS), Waterbase Stain Base 5% (7 pages)
- 9) SDS, Exterior Waterbase Topcoat Satin (7 pages)
- 10) SDS, Acetone (12 pages)
- 11) SDS, HYSOL Stain Base (11 pages)
- 12) SDS, W/B Tint-Black (12 pages)
- 13) SDS, W/B Tint-Yellow (11 pages)
- 14) SDS, W/B Tint-Red (11 pages)
- 15) SDS, Plastofix Elite 311216817 Woodharbor QQQQ 10 Degree (12 pages)
- 16) Material Safety Data Sheet (MSDS) Fast Reducer (low HAPS) (7 pages)
- 17) SDS, Kop-Coat Woodlife® wood preservative (11 pages)
- 18) State of Iowa Department of Natural Resources (IDNR) letter dated July 1, 2015, Re:
Regarding Special Waste Authorization #17-SWA-04-03.
- 19) TruStile document, Tru Stile Loads (of sawdust) (3 pages)
- 20) MSDS, Franklin Multibond® 2000 Water-Based Adhesive (5 pages)
- 21) E-mail from Dave Imler, TruStile, dated January 5, 2016, Subject: FW: TruStile Glue (1
page)
- 22) E-mail from Craig Toft, City Superintendent, Northwood, Iowa, dated September 25, 2017,
Subject: Chemicals (1 page)
- 23) SDS, Mineral Spirits (12 pages)
- 24) TruStile Contingency/Emergency Action Plan (16 pages)
- 25) TruStile Quick Reference Guide (4 pages)

Notice of Preliminary Findings

(For Contractor Use Only)

Facility Name: TruStile Doors of Iowa
Facility Address: 100 Enterprise Drive
Northwood, IA 50459
EPA ID#: IAD 980739981 Date: 12/1/2021

Notice: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for the 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 the 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 will make determinations as to what violations may have occurred at your facility.

Citation

Description of Finding

~~40CFR 262.17(a)(6)~~ → ~~262.254(a)~~ Failure to have
communication equipment
~~40CFR 262.17(a)(1)(iv)(B)(A)~~ Failure to keep
~~262.17(a)(1)(iv)(A)~~ container of H₂ closed
~~40CFR 262.17(a)(6)~~ → ~~262.256(a)~~ Make arrangements
with local emergency agencies
~~40CFR 262.17(a)(6)~~ → ~~262.261(c)~~ Include in contingency
plan description of
arrangements with local
emergency agencies, as appropriate.

If you have any questions about this Notice or wish to discuss your response, you may call me at
(913) 551-7120, or Kevin Snowden (Compliance Officer)
at (913) 551-7022

This Notice prepared by H. D. "DOUG" BRYANT, CPHAT Date: 12/1/2021

The undersigned person hereby acknowledges receipt of this Notice and has read the same.

Printed Name: Kris Pierce Date: 12-1-21
Signature: Kris Pierce
Title: Plant Manager

Page 1 of 2

Notice of Preliminary Findings (Continued)

Media: RCRA

Facility Name: Tru Stick Doors of Iowa
 Facility Address: 100 Enterprise Drive
Northwood, IA 50459
 EPA ID#: IA11980739981 Date: 12/1/2021

Citation

Description of Finding

- 40 CFR 262.17(a)(6) → Prepare a quick reference guide and submit to emergency response agencies
 262.262(b)
- 40 CFR 262.17(a)(6) → Include a map showing where hazardous waste is generated or managed and access routes to these locations.
 262.262(b)(1)(4)
- 40 CFR 262.17(a)(7)(i)(c) Include in hazardous waste training for Emergency Coordinators.
- 40 CFR 262.17(a)(7)(iv)(A) Track specific job titles and names of persons filling positions
- 40 CFR 262.17(a)(7)(iv)(B) Describe, in writing, skills, education or qualifications and duties associated with each job title.

Initials of Recipient: D.P. Date: 12-1-21
 Initials of Preparer: H.C. Date: 12/1/2021