

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

WOOD COMPONENTS AND TECHNOLOGIES

6119 Nordic Drive
Cedar Falls, Iowa 50613
319-277-5050

EPA ID Number: IA0000006825

On

May 4, 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 CLAENE Group (Toeroek team) conducted a hazardous waste compliance evaluation inspection (CEI) at Wood Components and Technologies (Wood Components), at 6119 Nordic Drive, in Cedar Falls, Iowa. The CEI was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. As requested by the EPA compliance officer for the facility, the CEI covered hazardous waste generator requirements, used oil management, and universal waste requirements. This report and its attachments present the results of the CEI.

PARTICIPANTS

Wood Components:

Kurt Reeder, Owner

Toeroek Team:

William F. Starks, Inspector, 816-286-6951

INSPECTION PROCEDURES

Due to the spread of coronavirus disease 2019 (COVID-19) at the time of the CEI, I contacted Mr. Reeder via telephone on April 19, 2021. 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 the CEI at Wood Components on May 4, 2021, I conducted a drive-by inspection. I did not observe any areas of concern during the drive-by. Upon my arrival, I entered the main entrance, and spoke with Mr. Reeder. I explained the purpose of my visit to Mr. Reeder, and we proceeded to his office where I conducted an entry briefing with him.

During the entry briefing, I presented my business card and EPA credential letter to Mr. Reeder. I explained the scope and procedures for the CEI. I explained the facility's right to make confidentiality claims and provided a Notice Regarding Proprietary/ Confidential Business Information. I stated that at the conclusion of the CEI, he would be presented with a Confidentiality Notice (Notice) with which he could make or not make a claim of confidentiality for the facility. I also provided Mr. Reeder 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. Mr. Reeder read both of these documents.

A copy of each of the following documents was left with Mr. Reeder during the inspection:

- RCRA Facility Access Information Sheet
- Mr. Trevor Urban's business card
- RCRA Section 3007
- U.S. Federal Codes 1001 and 1002
- Notice Regarding Proprietary/Confidential Business Information
- Managing your Hazardous Waste: A Guide for Small Businesses
- Industry Sector Notebooks
- Environmental Compliance Assistance Centers
- Recycling Electronics: A Guide for Businesses
- Commercial Motor Vehicle Transportation System Security and Safety

I reviewed the Hazardous Waste Site Info Verification Report for Inspector (Verification Report) with Mr. Reeder (Attachment 1). Based on this review, I changed the facility name to Wood Components and Technologies, and added the North American Industrial Classification System (NAICS) code 321999 (All Other Miscellaneous Wood Product Manufacturing). I updated the Site Contact, Current Owner of Site, and Current Operator of Site sections of the report. I added used oil generator and changed Very Small Quantity Generator to Non-generator of Hazardous Waste in the Types of Regulated Activities section. I also deleted hazardous waste codes F003, U002, and U162 in the Hazardous Wastes Handled section of the Verification Report.

I conducted the visual inspection of the facility, accompanied by Mr. Reeder. Following the visual inspection, I reviewed facility records including Safety Data Sheets (SDS). 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. Reeder. During the exit briefing, I provided a Receipt for Documents and Samples, which Mr. Reeder signed, acknowledging receipt (Attachment 3). I provided Mr. Reeder the Notice, which he signed indicating no confidential business information had been provided (Attachment 4).

A map of the facility obtained during the CEI is in Attachment 5. An aerial photograph of the facility was downloaded after the CEI and is included in Attachment 6. The four photographs taken during the CEI are in Attachment 7.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

Wood Components manufactures wood bearings and curved window trim as well as performing custom millwork, and work with aluminum sheet metal. Raw materials include rough lumber, glue (interior and exterior), aluminum, and oil. The facility does not perform painting or staining operations of products on site. Painting and staining of products are contracted out to another company. Wood Components currently employs six personnel who work a ten-hour shift from 5:45 a.m. to 4:15 p.m. Monday through Thursday. The facility consists of single building of approximately 25,000 square feet (Attachment 5).

Rough lumber is cut to size and sanded. Wood bearings are solid wood and do not require gluing. Curved window trim is cut to size, glued together, and sanded. Interior window trim is glued with Titebond II Premium Wood Glue. Exterior window trim is glued with Titebond III Ultimate Wood Glue. SDS for these wood glues are included in Attachments 8 and 9, respectively. Dried beads of wood glue generated during the gluing process are removed via scraping and disposed in the general trash as nonhazardous waste.

After fabrication, wood bearings are impregnated with paraffin based oil, Northland Norpar 600. The SDS for Norpar 600 is included as Attachment 10. Wood bearings are transferred to a basket and placed in a sealed kettle. Oil is vacuumed into the kettle from a 1,000-gallon aboveground

storage tank (AST) (Attachment 7, Photograph 1). The kettle is pressurized to impregnate the wood bearings with oil. After the pressurization process, the oil is vacuumed back to the 1,000-gallon AST for reuse. No used oil is generated in this process.

Mr. Reeder stated that a small amount of sawdust is transferred back to the 1,000-gallon AST during the process. He explained that the AST is cleaned out approximately every 10 years. Approximately 10 gallons of tank bottoms (which is oily sawdust), are generated during the clean out. The facility considers tank bottoms to be nonhazardous waste based on product/process knowledge. The tank bottoms are transferred to sawdust that is sold as horse bedding. Tank bottoms were not observed during the visual inspection and are not discussed further in this report.

Custom work includes cutting aluminum sheet metal to size (primarily 4-inch by 6-inch, and 5-inch by 7-inch) for picture application. Scrap aluminum and aluminum shavings are transferred to an aluminum scrap metal container and collected by Alter Metal Recycling (Waterloo, Iowa) for recycling.

Wastes from manufacturing include scrap wood, aerosol cans, waste rags, and general trash. Sawdust, a by-product of the manufacturing process, is sold for horse bedding.

Scrap wood is bundled and picked up for use as fuel for heat. Empty aerosol cans and waste rags are disposed in general trash. Scrap metal from packaging is transferred to a scrap metal container and collected by Alter Metal Recycling for recycling.

Used oil and used oil filters are managed according to *Title 40 Code of Federal Regulations* (40 CFR) Part 279. Used oil and used oil filters are generated during service of the facility's air compressor and two fork trucks. The service vendors transport the used oil and used oil filters back to their respective facilities for recycling.

The facility has a fleet of two trucks and one van. The fleet is serviced (i.e. oil changes and general maintenance) by Community Motors (Waterloo, Iowa) at the dealership's facility. The wastes associated with fleet maintenance are not generated on site and are not discussed further in this report.

General trash is considered nonhazardous and is accumulated in a 2-cubic-yard container outside the facility. General trash is transported by the City of Cedar Falls to the Cedar Falls Transfer Station prior to transport to Black Hawk County Sanitary Landfill (Waterloo, Iowa) for landfill disposal.

The facility converted to light-emitting diode (LED) lamps in October 2019 and has not generated waste LED lamps since the conversion.

No previous RCRA inspections had occurred at Wood Components.

2. RCRA Status

Wood Components is identified as a very small quantity generator (VSQG) on the Verification Report provided by EPA (Attachment 1), generating less than 100 kilograms (kgs) of hazardous waste per month. Based on my review of the facility's operations and interview with Mr. Reeder, I concluded that the facility does not generate hazardous waste. Therefore, I determined the facility operates as a non-generator of hazardous waste. Wood Components is a used oil generator.

3. Waste Streams

This section of the CEI report describes waste streams generated by the facility, including the facility's waste determination, generation process and rate, management at the facility, and ultimate disposition. The following discussion of waste streams is based on conversations with Mr. Reeder, the visual inspection, and my review of waste shipping documents. Mr. Reeder accompanied me throughout the CEI.

Photographs taken during the visual inspection are referenced and described in the discussions below. I photographed the south building façade and the east building façades with the entrance to the facility (Attachment 7, Photographs 3 and 4).

Empty aerosol cans are generated from facility maintenance and maintenance of facility equipment, and are disposed into the general trash. The facility considers empty aerosol cans to be nonhazardous by product knowledge. The facility generates approximately three empty aerosol cans per year (two wasp and hornet aerosol cans, and one lubricant aerosol can). General trash is collected by the City of Cedar Falls on a monthly basis, and transferred to the Cedar Falls Transfer Station prior to transport to Black Hawk County Sanitary Landfill for landfill disposal. I advised Mr. Reeder that the facility may be able to recycle empty aerosol as scrap metal; however, he should check with the scrap metal recycler for guidance. I did not observe any deficiencies related to empty aerosol cans.

Waste rags are generated during the cleaning of computer numerical control (CNC) machines (3 total). A small amount of acetone product is placed on the rag prior to cleaning the machine. Mr. Reeder stated that one gallon of acetone product lasts approximately five years. The acetone evaporates through use and the rags are dry when the cleaning is done. After cleaning, the waste rag is considered nonhazardous waste based on product/process knowledge and placed into a red five-gallon container. The facility generates 2 or 3 waste rags per week which are disposed into general trash.

Mr. Reeder provided a copy of a SDS for All-Pro Acetone (Attachment 11). Upon review of the SDS, I noted a flashpoint of 0 degrees Fahrenheit (°F). According to Mr. Reeder, the acetone used has evaporated prior to disposal of the rag and is therefore considered nonhazardous. I noted no other constituents or characteristics in the SDS that would add listed or characteristic hazardous waste codes. As such, it appears the hazardous waste determination is adequate. I did not observe any waste rags in accumulation during the CEI, and noted no deficiencies related to waste rags.

Scrap metal is generated during custom work with aluminum sheet metal and packaging waste. The facility considers the waste to be exempt from the definition of hazardous waste per 40 CFR 261.4(a)(13) and 261.6(a)(3)(ii). Scrap aluminum and shavings are transferred to a 12-cubic-yard scrap metal container upon generation. The facility generates approximately 24 cubic yards of scrap aluminum per year. Scrap metal bands from packaging are transferred to a separate 12-cubic-yard scrap metal container upon generation. The facility generates approximately 24 cubic yards of scrap metal bands per year. Alter Metal Recycling transports scrap aluminum and scrap metal bands to their facility for recycling.

During the CEI, I observed the scrap aluminum container located off the dock doors on the south side of the facility (Attachment 7, Photograph 2). I did not observe any deficiencies related to scrap metal.

Scrap wood is generated during the cutting of wood. The wood is bundled and transferred to the south side of the facility. Scrap wood is considered nonhazardous waste based on product knowledge. The facility generates between 40 and 75 bundles of scrap wood per year. Each bundle weighs approximately 1,500 pounds. Scrap wood is picked up by an individual that burns the wood in a stove for heat. I did not observe any deficiencies related to scrap wood.

Sawdust is generated during the cutting and sanding of wood. The facility has a vacuum collection system that transfers the sawdust to a silo which is then augured to a trailer. The facility considers sawdust a by-product of the process and not a waste. The facility generates approximately 24 cubic yards of sawdust every 4 months. It is sold to T&R Livestock for use as horse bedding. I did not observe any deficiencies related to sawdust.

Used oil and used oil filters are generated during compressor maintenance by Compressed Air and Equipment Company Inc. (La Porte, Iowa). The facility generates approximately 2.5 gallons of used oil and two used oil filters every 2 years during compressor service. Used oil and used oil filters are also generated during maintenance of the two fork trucks by Big River Equipment Co. (Waterloo, Iowa). The facility generates approximately 2.5 gallons of used oil and two used oil filters annually during fork truck maintenance. The service vendors transport the used oil and used oil filters back to their respective facilities for recycling. I did not observe any deficiencies related to used oil or used oil filters.

General trash consists of nonhazardous wastes, packaging wastes, and general office-type refuse, as well as empty aerosol cans and waste rags. General trash is considered nonhazardous and is accumulated in a 2-cubic-yard container outside the facility. The facility generates approximately 2 cubic yards of general trash per month. It is collected by the City of Cedar Falls and transported to the Cedar Falls Transfer Station prior to transport to Black Hawk County Sanitary Landfill for landfill disposal. I did not observe any deficiencies related to general trash.

4. Summary of Preliminary Findings

In summary, as part of the CEI, I made no preliminary findings. 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.

William F Starks Digitally signed by William F Starks
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Date: _____

William F. Starks
Inspector
CLAENE Group

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Date: _____

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

Attachments:

1. Hazardous Waste Site Info Verification Report (1 Pages)
2. Data Gathering Worksheets and Checklists (13 Pages)
3. Receipt for Documents and Samples (1 Page)
4. Confidentiality Notice (1 Page)
5. Facility Map (1 Page)
6. Google Maps Aerial Image of the Facility (1 Page)
7. Photographic Documentation (Photolog and 4 Images) (3 Pages)
8. SDS for Titebond II Premium Wood Glue (5 Pages)
9. SDS for Titebond III Ultimate Wood Glue (5 Pages)
10. SDS for Northland Norpar 600 (6 Pages)
11. SDS for All-Pro Acetone (12 Pages)