

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

JOHN DEERE ENGINE WORKS

3801 West Ridgeway Avenue
Waterloo, Iowa 50701
(319) 292-5207

EPA RCRA ID No. IAD000678094

On

April 30, 2024

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 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 John Deere Engine Works (John Deere), at 3801 West Ridgeway Avenue in Waterloo, 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, used oil, and universal waste requirements as applicable. This report and its attachments present the findings of the CEI.

PARTICIPANTS

John Deere:

Sherry Klemke, Reception
Steve Malaise, Environmental Waste Manager
Don Hutchcroft, Maintenance Engineer
Lisa Hurban (Remote) – Environmental Engineer

Toeroek Team:

Steve Johnson, Inspector, (816) 520-7009

INSPECTION PROCEDURES

Prior to the CEI at John Deere on April 30, 2024, I conducted a drive-by visual inspection of the facility. The line-of-sight inspection included visible facilities by the shipping areas and drainage paths leading from the main plant. I did not observe any areas of concern during the drive-by inspection. After the drive-by inspection, I entered the visitor's entrance to the Main Building and approached the reception desk at approximately 10:20 a.m. I introduced myself to Ms. Klemke, explained the purpose of the CEI, and asked to speak with Ms. Hurban, the site contact listed on the Notification Acknowledgement/Verification Report (Verification Report) provided by EPA (Attachment 1). Ms. Klemke attempted to reach the Environmental office several times with no success. After contacting the corporate Manager of Environmental Engineering, Ms. Klemke stated that all environmental staff representatives were on travel to Moline, Illinois, for mandatory training and would be unable to respond to the site until Friday (May 3, 2024).

I asked Ms. Klemke if any other employees could assist with the CEI. She reached a maintenance supervisor willing to accompany me during the visual inspection and answer general operations questions; however, the request for his participation was denied by the facility's Environmental Health and Safety (EHS) office in Waterloo, Iowa. At approximately 11:20 a.m., I was greeted in the reception area by Mr. Hutchcroft, who had been given authorization to accompany me during the visual inspection. After checking in, we proceeded through the security door to the Plant Engineering offices. At approximately 11:35 a.m., we were joined by Mr. Malaise. Mr. Malaise stated that he could direct me to the waste generation and accumulation areas along with Mr. Hutchcroft; however, neither employee had access to the majority of RCRA-related records and documentation.

I conducted an entry briefing with Messrs. Hutchcroft and Malaise. During the entry briefing, I presented my EPA credentials. I explained the scope and procedures for the CEI and the facility's right to make confidentiality claims. I then provided a Notice Regarding Proprietary/Confidential Business Information form. Mr. Hutchcroft stated that he would have to defer any action related to confidential business claims to the corporate Environmental office. I provided Messrs. Hutchcroft and Malaise 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. Mr. Hutchcroft stated that the copies of U.S. Federal Codes 1001 and 1002 and RCRA Section 3007 would be forwarded to the EHS office for their file.

I conducted the visual inspection on April 30, 2024, accompanied by Messrs. Hutchcroft and Malaise. I also reviewed records available to Messrs. Hutchcroft and Malaise, such as the RCRA Contingency and Emergency Action Plan, on April 30, 2024. All other RCRA-related records, such as waste tracking and shipping records, uniform hazardous waste manifests, waste profiles, inspection logs, and training records, were maintained in the facility's electronic file system and were not available to Messrs. Hutchcroft and Malaise. Ms. Hurban was traveling on vacation until May 16, 2024. I conducted the remainder of the records review with Ms. Hurban via email and Microsoft Teams conference from May 17 to May 19, 2024.

During the records review with Ms. Hurban, I reviewed waste shipping records, waste profiles and analytical results, inspection logs, Safety Data Sheets (SDS), inspection logs, and training records. I prepared and completed a site-specific inspection checklist to document my observations during the April 30, 2024, visual inspection and subsequent records review.

A copy of each of the following documents were transmitted electronically to Ms. Hurban on April 30, 2024, after the visual inspection was completed. Receipt of these documents was acknowledged.

- RCRA Facility Access Information Sheet
- Mr. Trevor Urban's contact information (a business card was not available)
- 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
- U.S. EPA Small Business Resources Information Sheet
- Chemical Facility Anti-Terrorism Standards
- E-Manifest Fact Sheet: Generators
- Managing Your Hazardous Waste: A Guide for Small Businesses
- Part 279 Requirements: Used Oil Management Standards
- EPA Region 7 Emergency Response Program
- Recycling Electronics: A Guide for Businesses
- Battery Recycling/Disposal
- Management of Fluorescent Lamps for Businesses
- Incompatible Chemicals
- Universal Wastes – Including Aerosol Cans
- TCLP – Toxicity Characteristic Leaching Procedure
- Iowa Environmental Guide for Businesses

I reviewed the Notification Acknowledgement/Verification Report (Verification Report) with Messrs. Hutchcroft and Malaise on April 30, 2024, and Ms. Hurban on May 17, 2024 (Attachment 1). Based on the April 30, 2024, review and observations during the visual inspection, I changed the facility's hazardous waste generator status from large quantity generator (LQG) of hazardous waste to small quantity generator (SQG) of hazardous waste. Ms. Hurban confirmed the current generator status on May 17, 2024. I made no other changes to the Verification Report.

I conducted an exit briefing with Ms. Hurban via Microsoft Teams conference on May 19, 2024. During the exit briefing, I reviewed my observations during the CEI. I provided Ms. Hurban a Receipt for Documents and Samples, which she signed, acknowledging receipt (Attachment 2). I also provided Ms. Hurban the Notice, which she signed indicating no confidential business information had been provided (Attachment 3). I made no preliminary findings during the CEI, so a Notice of Preliminary Findings (NOPF) was not left with the facility at the conclusion of the CEI on May 19, 2024.

Maps of facility were obtained during the CEI and are in Attachment 4. Those drawings are the Master Layout and the Waste Location Map. The digital format in which they were provided allows for larger print detail than allowed in the report print format. A Google Earth aerial photograph of the facility was downloaded after the CEI and is in Attachment 5. The 23 photographs taken during the CEI are in Attachment 6.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

John Deere is a design/build manufacturer of high-output turbo diesel engines that are used in agricultural and commercial heavy equipment as well as industrial pumps and large watercraft. Facility operations encompass machining, paint, and final assembly of engines for use in John Deere mobile equipment. It has been operating at the current location since 1976. Current production rates are classified within management offices. The facility and operational support facilities on the campus are wholly owned and operated by John Deere and Company.

Manufacturing operations include cutting and machining of cast billet steel engine block and combustion head assemblies for the turbodiesel engines ranging in displacement from the smallest 9-liter engine to a new, larger 18-liter version of their powerhouse line. Metalworking operations include computer numeric control (CNC) machining, welding, bore cutting, milling and grinding before finished components are sent to the assembly half of the building. Prior to final assembly, block and combustion head components are sent for paint coating in a newly installed paint facility inside the plant. Reportedly, the new system was recently installed in late 2023 and has been ramped to full production output. Once the components are painted, they are sent through a curing oven that dries the components before being transferred to final assembly and shipping. The new paint process uses a low volatile organic compounds (VOC) urethane coating curing agent to minimize emissions and increase durability of the coatings. Much of the paint process is robotic and is highly automated. However, limited mask-and-trim and touchup work is still done manually by paint technicians using traditional spray application methods.

The facility consists of a single building with the building effectively divided into two halves to make use of vectored ventilation within the building. The purpose is to prevent weld fume, dust, and other aerosol particulate from migrating from the machining portion of the building to the assembly half of the structure. The East Building is primarily offices and production and encompasses approximately 160,130 square feet under roof. The production building includes administrative, engineering, and support offices at discrete locations in the facility. It encompasses approximately 810,800 square feet under roof. John Deere currently employs approximately 700 full-time personnel who work multiple shift combinations. The facility operates seven days per week.

Engines produced at the plant typically bear only four colors unless there is a rare Dealer Special Order (DSO). The coating colors used in paint operations are green, yellow, white, red and black. Engines are purpose-coated with green assigned to John Deere equipment, yellow for construction equipment, white for marine engines, and black and red for fire pumps and other fixed industrial equipment.

Prior to painting, fabricated components are cleaned by use of a 3-stage wash process or a wand wash booth. Wash water is discharged directly to the sanitary sewer system, with no prior accumulation, for treatment at the municipal publicly owned treatment works (POTW). According to plant officials, the discharge is authorized under a categorical pretreatment permit with the city. The facility considers the wash water to be exempt from the definition of solid waste, per Title 40 *Code of Federal Regulations* (40 CFR) 261.4(a)(1)(ii). Wash water is not discussed further in this report.

Wastes generated during manufacturing include waste paint-related material (WPRM), distillation bottoms, WPRM solids, used aerosols, waste paint pens, waste paint (episodic events), waste adhesives, and waste off-specification hypochlorite solution. WPRM consists of spent solvent and paint from paint gun cleaning, paint kitchen equipment cleaning, and paint line flushing. Flushing is performed using methyl amyl ketone (MAK) solvent. The facility considers WPRM to be hazardous based on product and process knowledge. Some of the WPRM is recycled on site in an onsite distillation unit to recover MAK solvent. Distillation bottoms are a dry “puck” waste and are considered nonhazardous based on product/process knowledge and analytical testing detailed in Attachment 10. MAK is not a listed solvent from non-specific sources contained in 40 CFR Part 261.31. WPRM solids consists of waste personal protective equipment (PPE), paint cups, saturated rags and sorbents, and other debris from painting operations. The facility considers WPRM solids to be hazardous based on product and process knowledge.

Used aerosols consist of empty and unwanted aerosol can products from touchup painting operations. The facility manages used aerosols as universal waste according to provisions of 40 CFR Part 273. Waste paint pens, waste paint, waste adhesives, and waste off-specification hypochlorite solution are considered to be hazardous based on product and process knowledge.

Equipment and facility maintenance generate spent metalworking fluids, used oils and lubricants, spent wipe rags and shop towels, used batteries, used lamps, and general trash. Spent metalworking fluids are considered nonhazardous based on product and process knowledge and are shipped for offsite recovery. Used oils and lubricants are considered to be used oil and are managed according to provisions of 40 CFR Part 279. Spent wipes, rags, and shop towels consist of cloth wipes used for cleaning that are not saturated. Spent wipes, rags, and shop towels are inherently dry when collected, and are considered nonhazardous based on product/process knowledge and analytical testing. Used batteries and waste lamps are managed as universal waste according to provisions of 40 CFR Part 273. General trash consists of packaging and office waste, as well as other debris determined to be nonhazardous waste. General trash is managed as nonhazardous waste and is collected for disposal at the Black Hawk County landfill.

John Deere had not been inspected by EPA in the last 10 years.

2. RCRA Status

John Deere was identified as a large quantity generator (LQG) of hazardous waste (generating more than 2,200 pounds or 1,000 kilograms [kg] of hazardous waste per month) on the Verification Report provided by EPA (Attachment 1). During the CEI, I used the facility’s

hazardous waste tracking records, manifest records, and the 2023 hazardous waste biennial report to determine John Deere's hazardous waste generation rate.

Ms. Hurban explained that hazardous waste generation rates are closely tracked on a monthly basis. Copies of the waste tracking logs from July 2023 to the present are in Attachment 7. I noted the only instance that John Deere exceeded the LQG threshold since July 2023 was due to a single generation of 2,300 pounds of off-specification hypochlorite bleach solution, which was shipped off site on November 8, 2023. In calendar year 2024, the facility's monthly hazardous waste generation rate has ranged from 186 to 609 pounds of hazardous waste per month. At this generation range, John Deere is currently operating as a small quantity generator (SQG) of hazardous waste (generating between 220 pounds [100 kg] and 2,200 pounds [1,000 kg] of hazardous waste per month). Uniform hazardous waste manifests for hazardous waste shipments in 2023 and 2024 support the determination that the facility is currently operating as a SQG of hazardous waste. Select manifests and LDR notifications are in Attachment 8.

John Deere does reclaim some WPRM at the facility, and the volume of waste reclaimed was not determined during the CEI. However, the distillation unit was installed in July 2023, and the facility was operating as a SQG before installation of the distillation unit (when all WPRM was counted toward the hazardous waste generator status).

Ms. Hurban concurred that the facility is currently operating as a SQG of hazardous waste. She explained that the facility was operating as a SQG of hazardous waste until an unplanned event involving expired paint resulted in the facility generating more than 2,200 pounds per month immediately following the national COVID health emergency. According to Ms. Hurban, John Deere EHS management has elected to retain LQG status and manage the facility according to LQG requirements until a static waste generation rate can be assured.

Based on the current hazardous waste generation rate, I inspected John Deere as a SQG of hazardous waste. I also inspected the facility as a small quantity handler (SQH) of universal waste (accumulating less than 5,000 kg of universal waste at any time) and a used oil generator.

John Deere accumulates hazardous waste in designated satellite accumulation areas (SAAs) throughout the facility. A map showing SAA locations is in Attachment 4. Full SAA containers are transferred to a dedicated hazardous waste central accumulation area (HWCAA). I inspected 3 SAAs and the HWCAA during the CEI.

3. 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. John Deere has performed hazardous waste determinations for all wastes generated at the facility. Waste profiles for large volumes waste streams are included in Attachment 9. Analytical results supporting nonhazardous waste determinations are in Attachment 10. The following discussion of waste streams is based on my interview with plant personnel, the visual inspection, and my review of available documentation.

WPRM consists of liquid waste paint and solvent generated during paint gun cleaning and paint line flushing in the Paint and Coating area. John Deere considers WPRM to be hazardous (D001) based on product and process knowledge. SDSs for the primary paints and MAK solvent are included in Attachment 11. Based on these SDSs, it appears the hazardous waste determination is adequate. WPRM is accumulated in 55-gallon SAA containers upon generation, and full containers are transferred to the HWCAA. Some WPRM is recycled in an onsite distillation unit to recover MAK solvent. I did not determine the quantity of WPRM reclaimed per month during the CEI. WPRM that is not reclaimed on site is transported off site to Veolia Environmental Services in Menomonee Falls, Wisconsin, for fuel blending. According to the facility's 2023 biennial report (Attachment 12), the facility shipped 3,338 pounds of WPRM off site in 2023.

During the CEI, I observed a 55-gallon SAA container of WPRM in the Paint Kitchen. The SAA container was near the point of generation, under control of the operator, and structurally sound. It was closed and labeled with the words "hazardous waste" and an indication of the nature of the hazard. The container held approximately 25 gallons of WPRM. Due to safety concerns regarding a potentially explosive atmosphere, no non-intrinsically safe electronic devices (including cameras) were allowed in the Paint Kitchen. However, I noted no deficiencies with accumulation of WPRM in the Paint Kitchen. No WPRM was in accumulation in the HWCAA at the time of the CEI.

WPRM solids consists of waste PPE, paint cups, saturated rags and sorbents, and other debris from painting operations. The facility considers WPRM solids to be hazardous (D001) based on product and process knowledge. According to the 2023 biennial report (Attachment 12), the facility generates approximately 1,181 pounds of WPRM solids per year. The waste is accumulated in 55-gallon SAA containers, and full containers are transported to the HWCAA. WPRM solids are transported to Veolia for fuel blending or bulking/offsite transfer.

During the CEI, I observed a 55-gallon SAA container of WPRM solids in the Paint Kitchen. The SAA container was near the point of generation, under control of the operator, and structurally sound. It was securely closed and labeled with the words "hazardous waste" and an indication of the nature of the hazard. The container held approximately 15 pounds of waste. Due to safety concerns regarding a potentially explosive atmosphere in the Paint Kitchen, no photographs of the SAA container were taken. However, I noted no deficiencies with accumulation of WPRM solids in the Paint Kitchen. No WPRM solids were in accumulation in the HWCAA at the time of the CEI.

Used aerosol cans consist of empty and unwanted aerosol can products from touchup painting areas in the facility. John Deere manages used aerosol cans as universal waste according to provisions of 40 CFR Part 273. Used aerosol cans are accumulated in 55-gallon containers at two locations in the facility. Full containers are transferred to the HWCAA. The waste is transported to Veolia for bulking and offsite transfer.

During the CEI, I observed a 55-gallon container of used aerosol cans at Column H-17 (Attachment 6, Photograph 8). The universal waste accumulation container was structurally sound, closed, labeled with the words "universal waste aerosol cans," and dated March 16, 2024 (Attachment 6, Photograph 5). The container held four used aerosol cans (Attachment 6,

Photographs 3 and 4). I noted no deficiencies with accumulation of used aerosol cans during the CEI.

Waste paint pens consist of waste paint residual in cylindrical applicators generated from coating touch-up of assembled products. John Deere considers waste paint pens to be hazardous (D001) based on product and process knowledge. The facility generates an estimated 20 pounds of waste paint pens per month. Waste pens are accumulated in a 55-gallon SAA container at Column H-17. Full SAA containers are transferred to facility's HWCAA. Waste paint pens are transported to Veolia in Menomonee Falls, Wisconsin, for bulking and offsite transfer.

During the CEI, I observed a 55-gallon SAA of waste paint pens at column location H-17 (Attachment 6, Photograph 8). The SAA container was near the point of generation, under control of the operator, and structurally sound. It was securely closed and labeled with the words "hazardous waste" and an indication of the nature of the hazard (Attachment 6, Photographs 6 and 7). No waste paint pens were in accumulation in the HWCAA. I noted no deficiencies with management of waste paint pens during the CEI.

Spent metalworking fluids consists of used metal cutting fluids and coolants generated during equipment maintenance. The generation rate varies but was estimated by Mr. Hutchcroft at 11,000 pounds per year based on tolling records. John Deere considers spent metalworking fluids to be nonhazardous based on product and process knowledge. The collection and disposition of the fluids is provided under tolling agreement with Incora. The waste is transported offsite for recovery. I noted no deficiencies with management of used coolant and metalworking fluids during the CEI.

Waste paint is sporadically generated from expired drum heels and/or expired product. Waste paint is accumulated in 5-gallon and 55-gallon SAA containers before being transferred to the HWCAA. When generated, the volume was estimated as 130 to 150 pounds per month. John Deere considers waste paint to be hazardous (D001) based on product and process knowledge. The waste is transported to Veolia for fuel blending. No waste paint was observed in accumulation at the time of the CEI.

Waste adhesives are sporadically generated from assembly and maintenance operations within the facility. Waste adhesives are accumulated in various SAA containers and transferred to the HWCAA when generated. The facility considers waste adhesives to be hazardous (D001, D035, F003, F005) based on product and process knowledge. When generated, the volume was estimated as 20 pounds per month. The waste is transported to Veolia for bulking and offsite transfer. No waste adhesives were observed in accumulation at the time of the CEI.

Used oils and lubricants are generated during equipment maintenance, support, and testing. John Deere manages used oils and lubricants according to provisions of 40 CFR Part 279. The facility generates an estimated 90 to 120 gallons of used oils and lubricants per month. The waste is accumulated in 30-gallon, 55-gallon, and 120-gallon used oil storage containers in the machine maintenance areas. Used oil is collected by NorSolv Environmental Services through its operating subsidiary Northland Oil in Waterloo, Iowa, and processed for recycling. A used oil collection receipt dated February 22, 2024, is included as Attachment 13.

During the CEI, I observed two used oil storage containers in the south building maintenance area. Both used oil storage containers appeared to be structurally sound and were labeled with the words “used oil.” I noted no deficiencies with management of used oil during the CEI.

Spent wipe rags and shop cloths consist of wipe rags and cloths used for general cleaning and spill cleanup of nonhazardous materials or wastes. Absorbents and rags used for cleaning in painting areas are managed separately as hazardous WPRM solids. John Deere considers spent wipe rags and shop cloths to be nonhazardous based on product and process knowledge. I did not determine a generation rate during the CEI. Spent wipe rags and shop cloths are accumulated in several containers throughout the facility and are collected by a local commercial launderer for cleaning and return to the plant for use in the paint operation areas.

During the CEI, I observed spent wipe rags and shop cloths in accumulation. No free liquids were observed in the accumulation containers. I noted no deficiencies with management of spent wipe rags and shop cloths during the CEI.

Distillation bottoms are generated from reclamation of WPRM to recover MAK. Distillation bottoms are a dry “puck” waste and are considered nonhazardous based on product/process knowledge and analytical testing (Attachment 10). The facility generates an estimated 350-400 pounds of distillation bottoms per month. The waste is collected in a 1-cubic-yard container outside the Paint Kitchen. The waste is transported to the Black Hawk County Landfill for disposal under a Special Waste Authorization.

During the CEI, I observed the recently installed MAK distillation unit (installed in July 2023) in the Paint Kitchen. Capacity of the unit was not known but estimated at approximately 140 gallons. I also observed the 1-cubic-yard accumulation container for distillation bottoms outside the Paint Kitchen (Attachment 6, Photographs 1 and 2). I noted no deficiencies with management of distillation bottoms during the CEI.

Off-specification hypochlorite solution is generated during disposal of off-specification of otherwise unwanted disinfectant solution. The facility considers the waste hazardous (D001) based on product and process knowledge. John Deere generated 2,300 pounds of off-specification hypochlorite solution during a one-time event in 2023 due to expiration of product acquired for general disinfection during the COVID emergency. The current generation rate was estimated as less than 25 pounds per month. The waste is transported to Veolia for bulking and offsite transfer when generated. No off-specification hypochlorite solution was observed in accumulation at the time of the CEI.

Waste lamps consist of waste 4-foot fluorescent lamps generated during facility maintenance. John Deere manages waste lamps as universal waste according to provisions of 40 CFR Part 273. The facility generates approximately 110 pounds of waste lamps per year based on shipping records. Waste lamps are accumulated in a fiberboard container in the HWCAA. The waste is transported to Veolia for recycling.

During the CEI, I observed two universal waste accumulation containers for waste lamps in the HWCAA. One container was empty (Attachment 6, Photograph 17). The other container held four waste lamps. The universal waste lamps container was structurally sound, closed, labeled

with the words “used lamps,” and dated February 14, 2024 (Attachment 6, Photograph 18). I noted no deficiencies with accumulation of waste lamps during the CEI.

Used batteries are generated during equipment maintenance, and include lead-acid, lithium-ion, and alkaline batteries. John Deere manages all used batteries as universal waste according to provisions of 40 CFR Part 273. The facility generates approximately 300 to 450 pounds of used batteries per year based on shipping records. Used batteries are accumulated in 5-gallon universal waste accumulation containers in the HWCAA. Used batteries are collected from the accumulation containers approximately every two to three months and transported to Veolia Environmental Services in Port Washington, Wisconsin, for recycling.

During the CEI, I observed nine 5-gallon universal waste accumulation containers in the HWCAA. Each container was structurally sound, labeled with the words “universal waste” and “batteries,” and marked with an accumulation start date. The oldest accumulation start date was September 6, 2023. Representative photographs of the used batteries containers are in Attachment 6, Photographs 19 through 21). I noted no deficiencies with management of used batteries during the CEI.

General trash consists of general packaging and office type refuse generated during production and maintenance, as well as other debris determined to be nonhazardous based on product and process knowledge. I did not determine a generation rate during the CEI. John Deere considers general trash nonhazardous based on product and process knowledge. General trash is accumulated in several containers throughout the facility and transferred to an onsite compactor. The waste is transported to the Black Hawk County Landfill for disposal. During the CEI, I observed general trash accumulation containers and noted no deficiencies.

4. Required Response Equipment and Hazard Management

Per 40 CFR 262.16(b)(9)(i), a SQG must have identified an emergency coordinator (EC) familiar with facility operations. According to Ms. Hurban, she is the primary EC for the facility.

Per 40 CFR 262.16(b)(9)(ii), a SQG must post by the telephone the name and contact information for the EC; the phone number of the fire department; and locations of fire extinguishers, spill response equipment, and, if present, fire alarms. During my inspection, I observed this information posted in the HWCAA (Attachment 6, Photograph 10). The facility also maintains a RCRA Contingency Plan, which contains the required information and is available near facility telephones.

Per 40 CFR 262.16(b)(8)(vi), a SQG must make arrangements with local emergency response agencies and familiarize responders with the facility layout. John Deere’s RCRA Contingency Plan describes arrangements with local emergency response agencies and has been submitted to the agencies.

5. HWCAA

The HWCAA an open-ceiling, wire-fenced and lock-secured area on a sealed concrete surface. The enclosure is used to store hazardous waste, nonhazardous waste, and universal waste prior to

off-site transport. The enclosure was marked with required signage on all four sides and with emergency contact information legible on a placard at the only entrance.

At the time of the CEI, the HWCAA held only universal wastes and a single PCB waste container. No deficiencies were noted with accumulation of universal wastes. Photographs of signage on fencing and accumulation cabinets are in in Attachment 6, Photographs 10 through 14 and 23. Photographs of waste accumulation containers in the HWCAA are in Attachment 6, Photographs 15 and 17 through 21.

During the CEI, I observed adequate aisle space for emergency response in the HWCAA, and no evidence of spills or leaks. I observed acid neutralizer, absorbent materials and a fire extinguisher at the HWCAA, Similar emergency response equipment and materials were observed to be available near SAAs and the Paint Kitchen. I noted no deficiencies with required response equipment and hazardous management during the CEI.

Environmental department personnel perform inspections of the HWCAA twice per week. The inspections are documented on checklists and maintained electronically. Copies of the inspection checklists for April 2024 are in Attachment 14. I reviewed the electronic inspection records for 2022 through 2024 to date and noted no missed inspections or identification of significant findings. I noted no deficiencies with management of HWACs in the HWCAA during the CEI.

6. Manifests and Bills of Lading

John Deere generated 21 uniform hazardous waste manifests over the past 2 years. I reviewed each of these manifests and associated LDR notifications during the CEI. Copies of select manifests and LDR notifications are in Attachment 8. I noted no deficiencies during my review of manifests.

7. Personnel Training Requirements

Per 40 CFR 262.16(b)(9)(iii), a SQG must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal facility operations and emergencies. I asked Ms. Hurban if hazardous waste training occurs. She explained that all personnel, including Incora/Haas FM contract services) receive initial and annual RCRA Awareness refresher training. Some job positions receive additional RCRA job-specific training such as Universal Waste handling, SPCC requirements and stormwater management training annually. She provided a copy of an environmental training matrix that indicates the training provided for each job position (Attachment 10). She provided a copy of the 2023 training tracking database filtered by job positions that handle hazardous waste (Attachment 15).

I reviewed overview content of the RCRA Awareness training during the CEI. The training covered topics such as waste identification, management, labeling, and emergency response. I also reviewed electronic copies of sign-in sheets and tests documenting training performed in 2023. I did not identify any deficiencies related to personnel training.

8. 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.

Steve A.
Johnson

Digitally signed by Steve
A. Johnson
Date: 2024.06.19
15:25:45 -05'00'

Date: _____

Steve Johnson

Inspector

CLAENE Group, LLC.

AMBER WHISNANT

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Amber Whisnant

Section Chief

ECAD/CB/RCRA, EPA Region 7

Attachments

1. Notification Acknowledgement/Verification Report (2 Pages)
2. Receipt for Documents and Samples (1 Page)
3. Confidentiality Notice (1 Page)
4. Facility Maps (2 Pages)
5. Google Earth Aerial Photograph (1 Page)
6. Photographic Documentation (Photolog and 23 Photos) (14 Pages)
7. Monthly Waste Tracking Logs (2 Pages)
8. Select 2023 and 2024 Manifests and LDR Notifications (11 Pages)
9. Hazardous Waste Profiles (14 Pages)
10. Analytical Results for Select Nonhazardous Wastes (12 Pages)
11. SDS for Paints and MAK Solvent (12 Pages)
12. 2023 Biennial Report Summary (11 Pages)
13. Used Oil Collection Receipt, Dated February 22, 2024 (2 Pages)
14. Inspection Checklists April 2024 (9 Pages)
15. RCRA Training Matrix 2023 (4 Pages)