

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

CONTITECH USA INC
400 N Goodyear Road
Mount Pleasant, IA, 52641
319-385-6814

EPA ID Number: IAD984571299

On

November 19, 2024

By

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

1.0 INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division (ECAD), I conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at ContiTech USA located in Mount Pleasant, Iowa, on November 19, 2024. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. During the inspection, I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. This inspection report and attachments represent the results of the CEI.

2.0 PARTICIPANTS

ContiTech USA:

- Brian Enearl, Quality Engineer/Environmental (12 years with company)
- Robert Hensley, Environmental Health and Safety Manager (2 days with company)
- Richard Reisdorf, Plant Manager (5 years with the company)

EPA:

- Mark Holcomb, Civil Investigator/Inspector (SEE) - Inspector

3.0 INSPECTION PROCEDURES

On November 19, 2024, I arrived unannounced at the facility's main security gate at about 0945 hours. Initially, I conducted a limited visual reconnaissance of the facility searching for areas of concern observable from the adjacent public roadways and parking lots. I identified no environmental issues or concerns during this preliminary examination. I entered the facility through the main entrance. At the security desk, I introduced myself and asked for the

Environmental Manager. I was introduced to Mr. Enearl, and he escorted me to a conference room in the main office building. There I met Mr. Hensley. Mr. Hensley was new to the organization and was just starting his orientation as the new EHS Manager. Mr. Enearl told me that the items of personal protective equipment required for my visual inspection at this facility were protective boots, eye protection, and hearing protection in some areas.

At the opening conference, I presented my EPA ID and credentials. I next explained the purpose and procedures of the inspection. I then presented Mr. Enearl with a copy of RCRA Section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented them with a copy of Title 18 U.S. Code, Sections 1001 and 1002. They were made aware of their confidentiality rights, and I informed them that a Confidentiality Notice would be provided at the end of the inspection to make a confidentiality claim if they so desired. Mr. Enearl and Mr. Hensley acted as the official facility representatives during the opening conference, visual inspection, and during the exit conference phase.

The CEI consisted of a discussion of facility operations, waste generation, and waste management; a visual inspection of active waste generation and management areas; and a review of waste management records and documents.

I conducted a visual inspection of the following areas:

- Shipping
- Quality Assurance (QA) Lab
- Maintenance
- Spiral Line 5
- Spiral Line 2
- PVC- Suction 4
- North Pad – Central Accumulation Area (CAA) Storage Shed

See Attachment #1 for the aerial/map views and facility diagrams. Document photocopies and photographs were collected as inspection documentation (see Attachments #1-12 and Photos 1-18). The photo log is included as Attachment #2. Information collected during the inspection was documented on an Entry/Exit checklist and a hazardous waste compliance checklist. I reviewed documents including the following: Safety Data Sheets (SDS), manifests, invoices, three-year eManifest report, contingency emergency plan, invoices, staff training documents, and weekly inspection checklists. I followed the inspection procedures detailed in the RCRA CEI Standard Operating Procedure 2321.01E unless noted otherwise.

At the conclusion of the inspection, I summarized my findings and recommendations with Mr. Enearl, Mr. Hensley, and the Plant Manager Mr. Reisdorf. I provided Mr. Enearl with a Receipt for Documents (see Attachment #3), a Confidentiality Notice (see Attachment #4), and a Notice of Preliminary Findings (NOPF) form, which he signed as an acknowledgment of receipt. No claim of confidential business information was made by Mr. Enearl.

I provided inspection and compliance assistance documents to Mr. Enearl, which included the following:

- *RCRA Section 3007(a) (EPA Handout)*
- *Title 18 U.S. Code, Sections 1001 and 1002 (EPA Handout)*

- *Confidentiality Notice (Top page of the completed carbonless transfer set)*
- *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA In Connection with Inspections (EPA Handout)*
- *Receipt for Documents and Samples (Top page of the completed carbonless transfer set)*
- *NOPF with Instructions for Responding on back of form (top page of the completed carbonless transfer set)*
- *U.S. EPA Small Business Resource Information Sheet (EPA Handout)*
- *Solvent-Contaminated Wipes Final Rule Chart (EPA Handout)*
- *Recycling Electronics (Iowa Department of Natural Resources – IDNR Handout)*
- *Lead-Based Paint Activities (IDNR Handout)*
- *Excluded Solvent-Contaminated Wipe Rule (IDNR Handout)*
- *Battery Recycling/Disposal (IDNR Handout)*
- *Management of Fluorescent Lamps for Businesses (IDNR Handout)*
- *Incompatible Chemicals (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)*
- *Requirements for Used Oil Management Standards (EPA Handout)*
- *Emergency Response Program (EPA Handout)*
- *Commercial Motor Vehicle Transportation System Security & Safety (EPA Handout)*
- *Security Awareness (EPA Handout)*
- *Chemical Facility Anti-Terrorism Standards (Homeland Security Handout)*
- *Iowa Life/Changing Iowa Department of Economic Development – Iowa Environmental Guide for Business (IDNR Handout)*
- *How to Register for RCRAInfo Industry Application for Iowa Facilities (IDNR Handout)*

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

ContiTech USA is a manufacturer of rubber and PVC hoses. ContiTech USA is division of Continental Corporation, a publicly traded international company founded in 1871 with its headquarters in Germany. Continental Corporation has annual sales of €41.4 billion and currently employs around 200,000 people in 56 countries. The ContiTech USA Mt. Pleasant, Iowa facility originally started operations in 1977 as a Goodyear plant, which was later sold to Veyance Technologies, which was then sold it to Continental Corporation in 2007. The Mt. Pleasant ContiTech USA facility is located on 27 acres, with 217,000 square feet under roof (see Attachment #1 for a facility map). The facility operates 24 hours per day, seven days a week, with 263 employees. The facility produces four to six million pounds of product per year. Mr. Enearl stated that there had been no significant changes, spills, or activations of their emergency plan in the previous three years.

4.2 RCRA Status

ContiTech USA had not been previously inspected for RCRA compliance. According to RCRAInfo, ContiTech USA had most recently notified as a small quantity generator (SQG) on September 15, 2021. I verified the facility address and the site contact information with Mr. Enearl on the EPA RCRA Notification Acknowledgement Verification Report (see Attachment #5) with no changes made. Mr. Enearl stated that he estimates they generate about 500-700 pounds of hazardous waste monthly. Based on the review of recent uniform hazardous waste manifests, I determined that ContiTech USA routinely generates D001, D018, D035, F003, and F005 hazardous waste. I determined the facility generates hazardous waste at the SQG level, between 100 kg or (220 pounds) and 1000 kg or (2,200 pounds) per month, and I inspected the facility as an SQG. In addition, I inspected the facility as a small quantity handler of universal waste and as a generator of used oil.

4.3 Facility Waste Streams and Management

Mr. Enearl stated that the following are waste streams generated at ContiTech USA:

Waste Ink and Solvent - ContiTech USA generates about 350-450 pounds per month of waste ink and solvent during the manufacturing process. The waste ink and solvent had been determined to be D001, D035, F003, and F005 hazardous waste based on product and process knowledge. This waste stream is listed on the Uniform Hazardous Waste Manifest as: *UN1993 Waste Flammable Liquid (Toluene, Cyclohexanone) Ink/Solvent*. See Attachment #7 for a manifest from September 16, 2024, and Attachment #8 for SDS of a commonly used white ink and the commonly used Gem Extender solvent. The September 16, 2024, manifest indicates 700 pounds, in two 55-gallon drums, being shipped by Univar Solutions USA (Burlington, Iowa) to Tradebe Treatment and Recycling (East Chicago, Illinois) for H020 processing (solvents recovery). This waste is collected onsite in a 55-gallon satellite accumulation area (SAA) drum located in Spiral Line 2 (see Photos 7-8). This drum was inside of a yellow flammable cabinet and observed to be about ¼ full of waste ink/solvent. The drum was in good condition, properly labeled with “hazardous waste” and “flammable” labels, and the funnel was closed and latched. I also observed a SAA 55-gallon drum in a flammable cabinet, near the QA Lab that was about 1/10 full. The funnel was closed and latched. It was labeled with “hazardous waste” and “flammable” labels. The drum was in good condition with no obvious damage or leaks (see Photos 2-3). I observed two full 55-gallon drums of waste ink/solvent in the outside Central Accumulation Area (CAA) shed on the North Pad. Both drums were in good condition with no obvious damage or leaks, and both drums were properly labeled and had accumulation start dates within 180 days (see Photos 15-16).

Waste Solvent/Ink Contaminated Wipes and Gloves - ContiTech USA generates about 150-250 pounds per month of solvent/ink contaminated wipes and personal protective equipment (PPE) gloves during the manufacturing process. The manifests and eManifest listings for the waste stream: *UN3175 waste solids containing flammable liquids (MEK, Ketone, Toluene)*, which is also identified in this report as: *Waste Solvent/Ink Contaminated Wipes and Gloves*, the waste codes listed were: D035 and F003, and do not indicate D001 (ignitable characteristic). See Attachment #7 for an example manifest from September 16, 2024. The SDS for the ink and

solvent (see Attachment #8) indicates that the Ink, contains 70-80% cyclohexanone with a flash point of 109 degrees F; and the solvent, or Gem Extender, contains greater than 90% cyclohexanone with a flash point of 111 degrees F. A flash point of less than 140 degrees F indicates an ignitable characteristic, which should be identified on the hazardous waste determination as D001. Mr. Enearl stated that he looked back through several years of manifests and noted that the D001 waste code was previously listed several years ago for this same waste stream when they were using a different hazardous waste shipper but appears to have been inadvertently dropped when the facility switched to the current waste shipper several years ago. I issued an NOPF for failure to make an accurate waste determination and list the waste code D001. I noted that this appeared to be an omission error on the manifest documentation since the facility considers this waste stream to be flammable and labeled the 55-gallon drums containing this waste stream with “flammable solid” labels.

➤ **NOPF 3: Failure to list waste code D001 on manifests for UN3175 waste solids containing flammable liquids (MEK, Ketone, Toluene), as required in 40 CFR 262.11(a)**

This waste was initially collected onsite in 16 five-gallon red step-cans with plastic bag liners. The step-cans are located throughout the manufacturing area. The facility uses the smaller step-cans to provide satellite containers closer to the workers to be “near the point of generation and under the control of the operator”. I observed two of the five-gallon step-cans for solvent/ink contaminated disposable wipes in the PVC- Suction 4 area. One step-can was empty and the other step-can contained one solvent/ink contaminated wipe. The step-cans had plastic bag liners. The step-cans did not have “hazardous waste” or “flammable” labels (see Photos 9-10). Mr. Enearl stated that the plastic bags are collected daily, or as often as needed, and transferred to the 55-gallon SAA steel drum located in Spiral Line 2 (note, this appears to be a SAA container to a larger SAA container transfer, but due to their facility layout and low volume of this waste stream, I determined this was a reasonable process). The 55-gallon drum is stored inside of a yellow flammable cabinet, was about 9/10 full, in good condition, closed, and labeled with “hazardous waste” and “flammable solid” labels (see Photo 6). When full the 55-gallon drum is transferred to the outside shed CAA in the North Pad area. The CAA shed contained three full 55-gallon drums of solvent contaminated wipes/gloves. The drums were closed, in good condition and properly labeled. The accumulation start dates were: 10/27/2024, 10/7/2024, and 11/9/2024, all within 180 days (see Photos 12-14). An NOPF was issued for failure to label the red five-gallon SAA step-cans with “hazardous waste” and “flammable” labels.

➤ **NOPF 2: Failure to label the red five-gallon step cans of solvent contaminated wipes with the words “Hazardous Waste” and the nature of the hazard (flammable), as required in 40 CFR 262.15(a)(5)(i) and 40 CFR 262.15(a)(5)(ii)**

Used Oil - ContiTech USA generates about 480 gallons of used oil annually from equipment preventive maintenance. The facility’s one 240-gallon used oil tank, located in Spiral Line 5, is serviced two to three times per year by Safety-Kleen and transported to the Safety-Kleen facility (Davenport, Iowa) for recycling (see Attachment #10 for an invoice). I observed the used oil tank to be less than 1/10 full and in good condition with no obvious damage or leaks. The tank was labeled with the words “Used Oil” (see Photo 5). Mr. Enearl stated that the spent oil filters (an unspecified number) are punctured, hot drained, and disposed of in the trash.

Universal Waste - ContiTech USA generates a mixture of universal wastes. Mr. Enearl stated that the facility generates a small amount of mercury switches and small non-automotive lead-acid batteries that are processed as universal waste. In the outside North Pad CAA, I observed a white two-gallon plastic container that was about 1/2 full of small lead-acid batteries. The lid was closed and properly labeled with “Universal Waste Batteries” and had an accumulation start date of 9/12/2024 (less than one year). I also observed one three gallon closed container of spent mercury switches. The box was properly labeled with “Universal Waste Mercury Devices” and an accumulation start date 12/11/2023 (less than one year). Mr. Enearl stated that both containers were pending transport to Safety-Kleen for recycling (see Photos 17-18). I did not observe any spent fluorescent lamps onsite.

Spent Parts Washer Solvent - ContiTech USA generates about 120 gallons per year of spent parts washer solvent from maintenance operations. This waste was determined to be non-hazardous based on product and process knowledge. The parts washer solvent used is Safety-Kleen NIL PD 680 Type II with a flashpoint of 152 degrees F (see Attachment #9 for SDS). The facility’s one 30-gallon parts washer in Maintenance is serviced every three months by Safety-Kleen and the waste solvent is transported to the Safety-Kleen facility (Davenport, Iowa) for recycling (see Attachment #10 for an invoice).

Spent Aerosol Cans and Waste Paint - ContiTech USA generates aerosol can waste liquids at the facility. These liquid wastes are generated from aerosol cans that are not completely emptied. This waste paint has been determined to be D001 hazardous waste based on product and process knowledge. This waste is collected in a 55-gallon drum with an aerosol can puncturing device attached to the top and stored in the CAA Shed on the outside North Pad (see Photos 4 and 16). The empty aerosol cans are placed in the trash. Mr. Enearl stated that this waste had been accumulating since at least 2010, so this waste stream had not been shipped in many years. The green steel 55-gallon drum of paint/solvent was about 2/3 full, closed, and in good condition. It is properly labeled as a SAA container.

General Trash - ContiTech USA generates about one 30-cubic yard roll-off every one to two weeks of trash from general business and plant operations or about 120 tons per month. Trash is compacted and transferred to the roll-off located in the North Pad and is picked up when full by Wemiga Waste Inc. (Mt. Pleasant, Iowa) and disposed of in the Lee County landfill (see Photos 1 and 11)

4.4 Other Areas Reviewed

Outside Facility Perimeter - I conducted a limited inspection of the outside perimeter of the facility and observed no hazardous waste storage tanks or containers except as noted above. See the aerial and map views in Attachment #1.

CAA – The central accumulation area (CAA or Less Than 180-Day Hazardous Waste Accumulation Area) accumulates both non-hazardous waste and hazardous waste. The CAAs are two storage sheds located outside of the plant (see Photos 12-18). Inside and adjacent to the CAAs, there were “No Smoking” signs, adequate spill kits, and fire control equipment. I also

reviewed the past three months of CAA Weekly Inspection checklists (see Attachment #11 for a completed checklist) with no issues noted.

Preparedness and Prevention - The facility has numerous fire extinguishers, spill kits, and eye wash stations. Mr. Enearl provided a copy of the facility's Contingency Plan called the "Emergency Response Plan". The plan appeared to be current (dated 1/24/2022) and contained all the required components (see Attachment #12). Mr. Enearl stated that the most recent copy of the Contingency Plan had been shared with the facility's local emergency response agencies. I did not observe any landline phones or alarm systems in or near to the CAA in the North Pad, outside on the north side of the facility. Mr. Enearl stated that staff transporting hazardous waste outside to the CAA are generally alone, do not have company issued radios or cell phones, and may not always have their personal cell phones with them. Mr. Enearl stated that the nearest phone for emergency use was inside the facility's QA Lab area, with its door about 150 feet to the East of the CAAs.

- **NOPF 1: Failure to maintain an internal communication alarm/phone/radio system for the North Pad outside CAA location, as required in 40 CFR 262.16(b)(8)(ii)**

SQG Personnel Training - Mr. Enearl stated that all staff with hazardous and universal waste handling responsibilities receive both initial and annual training to familiarize them with waste handling and emergency procedures relevant to their responsibilities.

Uniform Hazardous Waste Manifests and Land Disposal Restrictions (LDR). I reviewed the e-manifest report, and the paper copies of uniform hazardous waste manifests and LDRs over the previous three years. As I previously noted, both the paper manifests and eManifest listings for the UN3175 waste solids containing flammable liquids (MEK, Ketone, Toluene) waste stream, listed the D035 and F003 waste codes, but failed to indicate D001 (ignitable characteristic) as discussed in more detail above under the Waste Solvent/Ink Contaminated Wipes and Gloves waste stream. No other issues were noted.

5.0 SUMMARY OF FINDINGS

- **NOPF 1: Failure to maintain an internal communication alarm/phone/radio system for the North Pad outside CAA location, as required in 40 CFR 262.16(b)(8)(ii)**
- **NOPF 2: Failure to label the red five-gallon step cans of solvent contaminated wipes with the words "Hazardous Waste" and the nature of the hazard (flammable), as required in 40 CFR 262.15(a)(5)(i) and 40 CFR 262.15(a)(5)(ii)**
- **NOPF 3: Failure to list waste code D001 on manifests for UN3175 waste solids containing flammable liquids (MEK, Ketone, Toluene), as required in 40 CFR 262.11(a)**

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.

MARK HOLCOMB
(Affiliate)

Digitally signed by MARK
HOLCOMB (Affiliate)
Date: 2025.01.08
18:33:06 -06'00'

Mark Holcomb
Civil Investigator, SEE

AMBER WHISNANT

Digitally signed by
AMBER WHISNANT
Date: 2025.01.29
11:35:14 -06'00'

Amber Whisnant
RCRA Section Chief, ECAD/Chemical Branch

Attachments:

- 1) Facility Aerial Map Views and Diagrams (5 pages)
- 2) Photo Log (18 photos and 21 pages)
- 3) Receipt for Documents (1 page)
- 4) Confidentiality Notice (1 page)
- 5) EPA RCRA Notification Acknowledgement/Verification Report (1 page)
- 6) NOPF (1 page)
- 7) Manifest and LDR – Waste Ink & Solvent, September 16, 2024 (3 pages)
- 8) SDS- Ink & Solvent (12 pages)
- 9) SDS- Crystal Clean Parts Cleaner Solvent (8 pages)
- 10) Invoice Safety Kleen- Used Oil & Solvent (1 page)
- 11) CAA Checklist (1 page)
- 12) Emergency Plan (Contingency Plan) (87 pages)