REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

**ARCONIC US LLC**
4879 State Street
Bettendorf, Iowa 52722
(563) 459-2728

EPA RCRA ID No. IAD005270160

ON

April 12, 2023

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 Arconic US LLC (Arconic), at 4879 State Street, Bettendorf, 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

Arconic:

John Hylton, Staff Environmental Engineer
Jeremy Niemeier, Environmental Manager
Paul Ragona, Heritage Interactive Services – Solid Waste Coordinator

Toeroek Team:

William F, Starks, Environmental Consultant, (816) 286-6951

## INSPECTION PROCEDURES

Prior to the CEI at Arconic on April 12, 2023, I conducted a drive-by visual inspection. I did not observe any areas of concern during the drive-by. Upon my arrival, I entered the main entrance, explained the purpose of the CEI to the security guard, and asked to speak with the facility's environmental contact. The security guard asked to see my identification in order to issue a visitor's badge. I provided my EPA credentials and she provided a visitor's badge. After I watched a 5-minute safety video, Messrs. Hylton and Ragona met me in the lobby. Following introductions, Messrs. Hylton and Ragona escorted me to a conference room where I conducted an entry briefing with Messrs. Hylton, Ragona, and Niemeier.

During the entry briefing, I presented my business card and EPA credentials to Messrs. Hylton, Ragona, and Niemeier. 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, they would be presented with a Confidentiality Notice (Notice) with which they could make or not make a claim of confidentiality for the facility. I also provided Messrs. Hylton, Ragona, and Niemeier 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. Messrs. Hylton, Ragona, and Niemeier read both of these documents.

I reviewed the facility compliance assistance handouts typically provided to facilities with Messrs. Hylton and Ragona. They explained that they already had copies of the majority of the handouts. A copy of each of the following documents was left with the facility during the inspection:

- RCRA Facility Access Information Sheet
- Mr. Trevor Urban's business card
- RCRA Section 3007
- U.S. Federal Codes 1001 and 1002
- Instructions for Responding to a Notice of Preliminary Findings
- Notice Regarding Proprietary/Confidential Business Information
- Chemical Facility Anti-Terrorism Standards
- Small Quantity Generator Reminder to Re-notify
- Part 279 Requirements: Used Oil Management Standards
- EPA Region 7 Emergency Response Program

I reviewed the Notification Acknowledgement/Verification Report (Verification Report) with Messrs. Hylton and Niemeier (Attachment 1). Based on this review, as well as observations during the CEI, I updated the Site Contact information to include Mr. Niemeier, the name of the facility, and added D008 to the list of EPA hazardous waste codes generated by the facility. Mr. Hylton stated that the name change became effective on January 1, 2023. Mr. Ragona provided copies of the RCRA Subtitle C Site Identification Form submitted to EPA after the name change and the acceptance email from the EPA RCRAInfo Team acknowledging receipt (Attachment 2).

I conducted the visual inspection and the records review on April 12, 2023, accompanied by Messrs. Hylton, Ragona, and Niemeier. During the records review, I reviewed facility documentation such as inventory reports, RCRA Contingency Plan, training records, shipping records, inspection logs, and hazardous waste determination records. I prepared and completed a site-specific inspection checklist to document my observations.

At the conclusion of the CEI on April 12, 2023, I conducted an exit briefing with Messrs. Hylton, Ragona, and Niemeier. During the exit briefing, I provided a Receipt for Documents and Samples, which Mr. Niemeier signed, acknowledging receipt (Attachment 3). I provided Mr. Niemeier the Notice, which he signed indicating no confidential business information had been provided (Attachment 4). I also provided Mr. Niemeier a Notice of Preliminary Findings (NOPF), which he signed to acknowledge receipt (Attachment 5).

A diagram of the facility was obtained during the CEI and is in Attachment 6. An aerial photograph of the facility was downloaded after the CEI and is in Attachment 7. The 27 photographs taken during the CEI are included in Attachment 8, 22 of which are discussed in this report.

## FINDINGS AND OBSERVATIONS

### 1. Facility Description and General Information

Arconic produces rolled aluminum sheet and plate for a variety of industries, such as aerospace, automotive, packaging, building and construction, electronic, oil and gas and other commercial industries, for over 1,100 global customer locations.

The facility's processes includes metal purification, casting, rolling and stretching, sawing and machining, heat and non-heat treating, and sheeting and plating. These processes produce a wide variety of product specifications and aluminum alloy combinations.

Arconic produces 99 percent pure aluminum as well as alloys containing low levels of copper, manganese, magnesium, silicon and or zinc. Virgin and scrap aluminum is alloyed and cast into ingots, which are then rolled out on the facility's rolling mills and, depending on the process, heat treated and/or annealed. The facility contains three reversing hot mills (144, 160, and 220 inches wide), a 100-inch 5-stand hot mill, two 100-inch cold mills, an 86-inch continuous heat treat line, an 88-inch continuous heat treat line (exclusively for the automotive industry), and two vertical heat treat lines. Arconic ships approximately 1.3 million pounds of finished product per day.

Aluminum scrap metal is generated during aluminum production and transferred to the Ingot area where it is recycled into the ingot making process. Iron and steel scrap metal generated during facility equipment maintenance are transported to Alter Trading Corporation in Davenport, Iowa, for recycling.

Used oil is generated during aluminum production and facility equipment maintenance. Used oil is piped to an ultrafiltration treatment plant owned and operated by Arconic. After treatment, used oil concentrate is piped to an onsite oil reclamation facility that is owned and operated by Veolia Water North America. Processed used oil is returned to Arconic for offsite shipment.

Arconic generates approximately 20.5 million gallons of used oil per year. Used oil is managed according to provisions of Title 40 *Code of Federal Regulations* (40 CFR) Part 279.

Maintenance activities also generate waste paint related materials (WPRM), spent solvents, used oil filters, waste batteries, waste lamps, waste mercury-containing equipment, and rubber roll grinding swarf. WPRM and spent solvents generated during painting, lab testing, and equipment cleaning are considered hazardous by product/process knowledge and are transported offsite for fuel blending. Used oil filters are generated during onsite fork truck maintenance and are crushed in a filter crusher. Used oil from the crushing process is collected in a 5-gallon used oil storage container. Crushed used oil filters are considered to be scrap metal, and are transported to Alter Trading Corporation in Davenport, Iowa, for recycling.

Waste batteries include lead acid, lead paste, nickel-cadmium, lithium, and alkaline batteries. Waste alkaline batteries are managed as nonhazardous waste. All other waste batteries are managed as universal waste according to provisions of 40 CFR Part 273. Waste fluorescent lamps and waste high intensity discharge (HID) lamps are managed as universal waste according to provisions of 40 CFR Part 273. Waste mercury-containing equipment is also managed as universal waste according to provisions of 40 CFR Part 273. Waste batteries, lamps, and mercury-containing equipment are transported to Waste Management in Williamston, South Carolina, for recycling through the Waste Management Lamptracker program.

Rubber roll grinding swarf is generated during equipment maintenance and considered nonhazardous through product/process knowledge. The waste is transported to Spring Grove Resource Recovery (Spring Grove) in Cincinnati, Ohio, for landfill disposal.

Maintenance activities also generate waste aerosol cans, which are primarily empty. Waste aerosol cans are collected in 55-gallon satellite accumulation containers (SACs) located throughout the facility. The facility considers waste aerosol cans hazardous based on product knowledge and ships the waste to Clean Harbors in El Dorado, Arkansas, for incineration.

Process wastewater includes wastewater generated during the aluminum forming process, which is regulated under the Effluent Guidelines and Limitations in 40 CFR Part 467, and non-categorical wastewaters from processes which do not have effluent guidelines (such as non-contact cooling water, boiler blowdown, and site groundwater remedial activities regulated by National Pollutant Discharge Elimination System (NPDES) permitting and EPA Superfund Programs). Arconic does not generate wastewater from other categorical wastewater generating processes.

Wastewater is treated in Arconic's NPDES-permitted wastewater treatment plant via chemically-assisted coagulation and flocculation followed by clarification to remove solids through precipitation. Chlorination/dechlorination and pH adjustment are used when necessary to meet water quality standards and achieve consistent water treatment operations. Treated wastewater is discharged to the Mississippi River under NPDES permit 8278100. Precipitated sludge is dewatered through addition of lime followed by a filter press. The sludge is considered nonhazardous by product/process knowledge and is transported off site for use as an ingredient in cement. Wastewater generated from the Automotive Treatment Line operation is treated in a pretreatment plant via chemically assisted coagulation and flocculation, followed by clarification

to remove solids through precipitation, followed by active biological treatment to reduce biological oxygen demand/chemical oxygen demand (BOD/COD) prior to discharge to the sanitary sewer under Industrial User Permit C-R-002. Groundwater is treated through air stripping using a packed bed air stripper or a stacked plate air stripper prior to introduction to the NDPES-permitted treatment plant.

Polychlorinated biphenyl (PCB) contaminated oil is generated when oil is removed from historically contaminated units managed under the site Superfund Program. These units are from historical operations prior to 1978, and are managed under EPA-approved Management Plans with oversight from the EPA Region 7 Remedial Project Manager.

General trash is generated during production and facility maintenance, and includes office-type refuse and other nonhazardous wastes. General trash is accumulated in various containers on site and transported to the Millennium Waste Landfill in Milan, Illinois, for landfill disposal.

The facility consists of approximately 132 acres under roof on approximately 278 acres of land, and is divided into four basic operational areas: aluminum sheet, aluminum plate, support (maintenance), and oil processing area. Arconic's primary North American Industrial Classification System (NAICS) code is 331315 (Aluminum Sheet, Plate, and Foil Manufacturing). According to Mr. Hylton, the facility has been operating at its current location since 1948. The facility employs approximately 2,400 full-time personnel and 1,000 contractors. The facility operates 24-hours per day, 7 days per week. Production and maintenance personnel work varying work shifts including rotating and scheduled 8- and 12- hour shifts.

On May 28 and 29, 2014, Arconic was inspected by an EPA contractor. Following the CEI, the inspector left the following preliminary findings:

- Failure to maintain adequate aisle space in the hazardous waste container accumulation area [40 CFR 262.34(a)(4) Referencing 265.35]
- Storage of hazardous waste longer than 90 days without a RCRA permit [Section 3005 of RCRA]

These findings were not repeated during this inspection.

## 2. RCRA Status

Arconic was identified as a large quantity generator (LQG) of hazardous waste (generating more than 1,000 kilograms [kg] of hazardous waste per month) on the Verification Report provided by EPA (Attachment 1). During the CEI, I confirmed Arconic's hazardous waste generation rate through a review of current operations, interviews with Messrs. Hylton and Ragona, and a review of waste disposal records (manifests, 2021 hazardous waste biennial report, and summary reports).

During the CEI, I reviewed the 2021 hazardous waste biennial report supplied by the EPA (Attachment 9). I noted the facility generated 28,020 pounds of waste sodium hydroxide solution (D002) in 2021. Mr. Ragona stated that this was generated during equipment cleaning and is not typically generated. Based on the biennial report, it appears that the facility operated as LQG of

hazardous waste for one month (October), and a small quantity generator (SQG) of hazardous waste (generating between 100 and 1,000 kg of hazardous waste per calendar month) the remaining 11 months of 2021.

I reviewed the 2022 summary report (Attachment 10). I noted a shipment of waste gas and diesel (D001, D018) in February of 8,642 pounds. Mr. Ragona stated that this was generated when product was inadvertently contaminated and needed to be disposed. In 2022, the facility also had a shipment of spent solvents (D001, D035, F003, F005) in December of 2,136 pounds. Mr. Ragona stated that this was generated during cleanup of a pipe rupture in the chemical room, and is not typically generated. It appears that the facility operated as a LQG of hazardous waste for two months and a SQG of hazardous waste for 10 months in 2022.

I reviewed the 2023 summary report (Attachment 11). I noted that the facility appears to have operated as a SQG of hazardous waste through the first three months (January through March) of 2023.

I provided compliance assistance regarding the episodic generation regulations with Messrs. Hylton, Ragona, and Niemeier. The facility has not utilized the episodic generation provisions, and manages hazardous waste per the LQG regulations. Because waste aerosol cans are a significant contributor to the facility's hazardous waste generation rate, I also discussed management of waste aerosol cans as universal waste (discussed in waste stream section) with Messrs. Hylton, Ragona, and Niemeier. Because the facility's hazardous waste generation rate exceeded the LQG threshold in one or more months in 2021 and 2022, I inspected Arconic as a LQG of hazardous waste (D001, D002, D005, D007, D008, D009, D011, D035, D040 characteristic; and F003, F005 listed hazardous wastes) during the CEI.

I also reviewed copies of shipping documents for universal waste lamps and batteries. Based on these documents, Arconic generates 1,485 pounds of universal waste lamps and 2,056 pounds of universal waste batteries per year. Based on the universal waste generation rates and on-site accumulation observed during the CEI, I inspected Arconic as a small quantity handler (SQH) of universal waste (accumulating less than 5,000 kg of universal waste at any time). Arconic is also a used oil generator and used oil processor.

### 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. The following discussion of waste streams is based on my interviews with Messrs. Hylton and Ragona, the visual inspection, and my review of available documentation.

**Printing ink related materials** are generated during product marking. The waste is accumulated in satellite accumulation containers (SACs), and full containers are transferred to the hazardous waste container accumulation area (CAA). The facility considers the waste hazardous (D001, F003) based on process/product knowledge. The facility generates approximately 119 pounds of printing ink related materials per month based on the 2022 summary report. The waste is transported to Safety-Kleen Corporation (Safety-Kleen) in Smithfield, Kentucky, or Spring

Grove in Cincinnati, Ohio, for fuel blending. The waste was last collected on February 22, 2023 (Attachment 12).

On the Box Line, I observed a 55-gallon SAC of printing ink related materials (Attachment 8, Photograph 27). The SAC was closed, near the point of generation, in good condition, under control of an operator, labeled with the words "hazardous waste" and an indication of the nature of the hazard, and held approximately 10 gallons of printing ink related materials. I noted no deficiencies with management of printing ink related materials during the CEI.

**Waste aerosol cans** are generated during production and maintenance activities. The waste is accumulated in SACs, and full containers are transferred to the CAA. The facility considers the waste hazardous (D001) based on product knowledge. The facility generates approximately 384 pounds of waste aerosol cans per month. The waste is transported to Clean Harbors in El Dorado, Arkansas, for incineration. The waste was last collected on March 16, 2023 (Attachment 13).

During the CEI, I observed six SACs of waste aerosol cans (photographs of representative SACs are in Attachment 8, Photographs 9 and 26). All six SACs were closed, near the point of generation, in good condition, under control of an operator, labeled with the words "hazardous waste" and an indication of the nature of the hazard, and held less than 55 gallons of waste aerosol cans.

In the CAA, I observed two 55-gallon hazardous waste accumulation containers (HWACs) of aerosol cans (Attachment 8, Photograph 3). Both HWACs were closed, in good condition, labeled with the words "hazardous waste" and an indication of the nature of the hazard, and marked with accumulation start dates of April 6, 2023.

I explained to Messrs. Hylton, Niemeier, and Ragona that waste aerosol cans could be managed as universal waste according to provisions of 40 CFR Part 273. Mr. Ragona stated that the facility is currently having discussions about managing waste aerosol cans as universal waste, thus removing them from their calculation of hazardous generation. However, he said that classification is still in the planning stages. He explained that the facility is considering the implications of a one-year universal waste accumulation time limit compared to an unlimited time limit for satellite accumulation. I provided compliance assistance materials to Messrs. Hylton, Niemeier, and Ragona concerning universal waste aerosol cans. I noted no deficiencies with management of waste aerosol cans during the CEI.

**Waste gas and diesel** is generated during facility equipment maintenance. The waste is accumulated in SACs, and full containers are transferred to the CAA. The facility considers the waste hazardous (D001, D018) based on process/product knowledge. The facility generates approximately 146 pounds of waste gas and diesel per month based on the 2022 summary report. The waste is transported to Safety-Kleen in Smithfield, Kentucky, or Dolton, Illinois, for fuel blending. The waste was last collected on February 22, 2023 (Attachment 12).

During the CEI, I observed a 55-gallon SAC of waste gas and diesel in the Fork Truck Repair Area, (Attachment 8, Photograph 7). The SAC was closed, near the point of generation, in good

condition, under control of an operator, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and held approximately 15 gallons of waste gas and diesel.

In the Fork Truck Repair Shop, I observed a 55-gallon SAC of waste gas and diesel. The SAC was closed, near the point of generation, in good condition, under control of an operator, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and held approximately 10 gallons of waste gas and diesel. I noted no deficiencies with management of waste gas and diesel during the CEI.

**Waste PPE** is generated during production and maintenance activities. The waste is accumulated in SACs, and full containers are transferred to the CAA. The facility considers the waste hazardous (D007) based on process/product knowledge. Mr. Ragona stated that waste PPE includes used leather palm gloves. He explained that because leather is commonly characteristically toxic for chromium, the facility manages the waste as hazardous waste based on process knowledge. The facility generates approximately 120 pounds of waste PPE per month based on the 2022 summary report. The waste is transported to Spring Grove in Cincinnati, Ohio, or Clean Harbors Lone Mountain in Waynoka, Oklahoma, for storage, bulking, and/or transfer off site. The waste was last collected on March 16, 2023 (Attachment 14).

During the CEI, I observed a 55-gallon SACs of waste PPE in the Machine Shop. The SAC was closed, near the point of generation, in good condition, under control of an operator, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and held approximately 20 gallons of waste PPE. I also observed an empty SAC for waste PPE in the Ingot area. The SAC was closed, near the point of generation, in good condition, under control of an operator, and labeled with the words “hazardous waste” and an indication of the nature of the hazard.

In the CAA, I observed two 55-gallon HWACs of waste PPE (Attachment 8, Photograph 3). Both HWACs were closed, in good condition, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and marked with accumulation start dates of April 5, 2023. I noted no deficiencies with management of waste PPE during the CEI.

**WPRM** is generated during facility maintenance painting. The waste is accumulated in SACs, and full containers are transferred to the CAA. The facility considers the waste hazardous (D001, D035, F003, F005) based on process/product knowledge. The facility generates approximately 103 pounds of WPRM per month based on the 2022 summary report. The waste is transported to Safety-Kleen in Smithfield, Kentucky, or Dolton, Illinois, or Spring Grove in Cincinnati, Ohio, for fuel blending. The waste was last collected on February 22, 2023 (Attachment 12). I did not observe WPRM in accumulation during the CEI.

**Spent solvents** are generated during lab testing and equipment cleaning. The waste is accumulated in SACs, and full containers are transferred to the CAA. The facility considers the waste hazardous (D001, D035, F003, F005) based on process/product knowledge. The facility generates approximately 15 pounds of spent solvents per month based on the 2023 biennial report. The waste is transported to Safety-Kleen in Smithfield, Kentucky, for fuel blending. The waste was last collected on December 28, 2021 (Attachment 15).

According to Mr. Ragona, spent solvents generated infrequently in production areas. Because of this, SACs of spent solvent do not need to be changed frequently. During the CEI, I observed five 55-gallon SACs of spent solvents in the Number 12 Slitter, 60-inch Line, Flat Sheet Line, Flat Sheet Pack Line, and Number 5 H-Frame areas. All five SACs were closed, near the point of generation, in good condition, under control of an operator, labeled with the words "hazardous waste" and an indication of the nature of the hazard, and held less than 55 gallons of spent solvents.

I also observed an empty 55-gallon container for spent solvent in the Tunnel Area (Attachment 8, Photographs 21 and 22). I noted the container was labeled with the words "hazardous waste" and an indication of the nature of the hazard. Mr. Ragona stated that the container is a SAC. I noted no waste generating processes in the area and asked Mr. Ragona where the solvent is generated. Mr. Ragona directed me through a door into a production area and explained that this is where the spent solvent is generated. Spent solvent from the production area is then transferred to the SAC in the Tunnel Area. I explained to Messrs. Hylton, Niemeier, and Ragona that SACs must be at or near the point of generation and under control of an operator. I added that the Tunnel Area is not the point of generation and since the container was out of the line-of-sight of the operator who generated the waste, it did not appear to be under control of the operator. I also explained that since the container was empty, I noted no deficiencies at the time of the CEI. Mr. Ragona stated that maintenance personnel would relocate the container inside of the production area where the spent solvent is generated.

In the Lab area, I observed a 30-gallon SAC of spent solvent. The SAC was closed, at the point of generation, in good condition, under control of an operator, labeled with the words "hazardous waste" and an indication of the nature of the hazard, and held approximately 2 gallons of spent solvent.

**Aluminum scrap metal** is generated during aluminum production. It is accumulated in containers and transferred to the Ingot area where it is recycled into the ingot making process. Aluminum scrap metal is considered to be excluded from the definition of solid waste when recycled. The generation rate of aluminum scrap metal was not obtained during the CEI. I observed accumulation of aluminum scrap metal during the CEI and noted no deficiencies.

**Iron and steel scrap metal** is generated during facility equipment maintenance. It is accumulated and transferred to a scrap metal container. Iron and steel scrap metal is considered to be excluded from the definition of solid waste when recycled. The facility generates approximately 2.5 million pounds of scrap metal annually. Iron and steel scrap metal is transported to Alter Trading Corporation in Davenport, Iowa, for recycling. I observed accumulation of iron and steel scrap metal during the CEI and noted no deficiencies.

**Used oil** is generated during aluminum production and facility equipment maintenance. Used oil is piped to an ultrafiltration treatment plant owned and operated by Arconic. Used oil is also collected in used oil storage containers and transferred to the ultrafiltration treatment plant. After treatment, used oil concentrate is piped to an onsite oil reclamation facility owned and operated by Veolia Water North America. Used oil is managed according to provisions of 40 CFR Part 279. The facility generates approximately 20.5 million gallons of used oil per year. Used oil

is transported to Heritage - Crystal Clean in Davenport, Iowa, for recycling. Used oil was last collected on April 10, 2023 (Attachment 16).

Mr. Hylton provided a copy of the 2021 Used Oil Biennial Report describing the used oil processing activities (Attachment 17). Mr. Hylton stated that the report was submitted to the EPA prior to the March 1, 2022, deadline, as required by 40 CFR 279.57(b). I also obtained copies of the Used Oil Analysis Plan, as required by 40 CFR 279.55 (Attachment 18), and Rebuttable Presumption for Used Oil, as required by 40 CFR 279.53 (Attachment 19). Arconic maintains a written operating record of the used oil analyses performed, as required by 40 CFR 279.57(a)(2)(i) (Attachment 20), and a fuel oil transfer log (Attachment 21).

During the CEI, I observed a 500-gallon used oil storage container in the Fork Truck Repair area. The used oil storage container was in good condition with no apparent leaks, labeled with the words "used oil," and held approximately 250 gallons of used oil.

I also observed a 5-gallon used oil storage container under a used oil filter crusher in the Fork Truck Repair area (Attachment 8, Photograph 8). The used oil storage container appeared to be in good condition with no visible leaks and held approximately 2 gallons of used oil.

I observed a 55-gallon used oil storage container in the Tunnel area (Attachment 8, Photograph 21). The used oil storage container was in good condition with no apparent leaks, labeled with the words "used oil," and held approximately 18 gallons of used oil.

In the Fork Truck Repair Shop, I observed a 55-gallon used oil storage container. The used oil storage container was in good condition with no apparent leaks, labeled with the words "used oil," and held approximately 40 gallons of used oil.

I observed a second 55-gallon used oil storage container in the Fork Truck Repair Shop (Attachment 8, Photograph 13, 14, and 16 through 19). The used oil storage container appeared to be in good condition with no apparent leaks and held approximately 10 gallons of used oil. However, the used oil storage container was not labeled with the words "used oil," as required by 40 CFR 279.22(c)(1) **(NOPF No. 1)**.

I explained this preliminary finding to Messrs. Hylton, Niemeier, and Ragona during the visual inspection and provided compliance assistance regarding management of used oil storage containers. Prior to leaving the area, facility personnel marked the 55-gallon used oil storage with the words "used oil" (Attachment 8, Photograph 20).

I observed a 400,000-gallon used oil aboveground storage tank (AST) located north of the WWTP (Attachment 8, Photograph 11). The used oil AST appeared to be in good condition with no visible leaks, was labeled with the words "used oil," and held approximately 293,540 gallons of used oil. The used oil AST was located within a secondary containment structure that showed no evidence of leaks and appeared to be structurally sound.

**Used oil filters** are generated during maintenance of facility equipment. Used oil filters are hot drained and crushed prior to transfer to a scrap metal container. Used oil from crushed used oil filters is collected in a used oil storage container beneath the filter crusher. Drained and crushed

used oil filters are considered nonhazardous based on product/process knowledge. The generation rate of used oil filters was not obtained during the CEI. Crushed used oil filters are transported to Alter Trading Corporation in Davenport, Iowa, for recycling. I did not observe used oil filters in accumulation during the CEI.

**Waste batteries** are generated during facility equipment maintenance. They are transferred to 5- and 55-gallon universal waste battery accumulation containers in the Universal Waste Accumulation Area, and full containers are transferred to CAA. Waste alkaline batteries are considered nonhazardous waste. All other waste batteries are managed as universal waste according to provisions of 40 CFR Part 273. The facility generates approximately 400 pounds of nonhazardous alkaline waste batteries and 2,056 pounds of universal waste batteries per year. Waste batteries are shipped to Waste Management in Williamston, South Carolina, for recycling through the Waste Management Lamptracker program. The last shipment of waste batteries was on December 9, 2022.

In the Universal Waste Accumulation Area, I observed one 5-gallon and two 55-gallon universal waste battery accumulation containers, and one 55-gallon container of nonhazardous alkaline batteries (Attachment 8, Photograph 4). The universal waste battery accumulation containers were labeled with the words "universal waste batteries" and marked with accumulation start dates. The oldest universal waste accumulation start date was August 5, 2022. I noted no deficiencies with management of waste batteries during the CEI.

**Waste Lamps** are generated during facility maintenance. They are transferred to universal waste lamp accumulation containers in the Universal Waste Accumulation Area, and full containers are transferred to CAA. The facility manages all waste lamps as universal waste according to provisions of 40 CFR Part 273. The facility generates approximately 1,485 pounds of universal waste lamps per year. The waste is shipped to Waste Management in Williamston, South Carolina, for recycling through the Waste Management Lamptracker program. The last shipment of universal waste lamps was on December 9, 2022.

In the Universal Waste Accumulation Area, I observed one 55-gallon, one 4-foot, and one 8-foot universal waste lamp accumulation containers (Attachment 8, Photograph 4). The universal waste lamp accumulation containers were in good condition, closed, labeled with the words "universal waste lamps," and marked with accumulation start dates. The oldest universal waste accumulation start date was November 21, 2022. There were approximately 235 universal waste lamps in accumulation at the time of the CEI. I noted no deficiencies with management of waste lamps during the CEI.

**Waste mercury-containing equipment** is generated during facility equipment maintenance and transferred to a universal waste mercury-containing equipment accumulation container upon generation. The facility manages waste mercury-containing equipment as universal waste according to provisions of 40 CFR Part 273. The facility generates approximately 2 pounds of waste mercury-containing equipment per year. The waste is shipped to Waste Management in Williamston, South Carolina, for recycling through the Waste Management Lamptracker program. The last shipment of universal waste mercury-containing equipment was on December 9, 2022.

During the CEI, I observed a 3-gallon universal waste mercury-containing equipment accumulation container in the CAA. The universal waste container was in good condition, closed, marked with an accumulation start date of December 20, 2022, labeled with the words "universal waste mercury containing equipment," and held two mercury-containing equipment items. I noted no deficiencies with management of waste mercury-containing equipment during the CEI.

**Process wastewater** is generated during aluminum forming process. It is also generated from non-contact cooling water, boiler blowdown, and site groundwater remedial activities. Process wastewater is piped to the onsite WWTP for treatment. The facility has determined that the wastewater is exempt from the definition of solid waste per 40 CFR 261.4(a)(2). According to Mr. Hylton, the facility treats approximately 600,000 gallons of process wastewater per day. Treated wastewater is then discharged to the Mississippi River under NPDES permit 8278100, or to the City of Davenport POTW under Industrial User Permit C-R-002. I observed the WWTP during the CEI and noted no deficiencies.

**Filter press sludge** is generated during treatment of process wastewater. The waste is collected in a 30-cubic-yard container under the filter press. The facility considers filter press sludge to be nonhazardous based on process/product knowledge. The facility generates approximately 90 cubic yards of filter press sludge per day. The waste is shipped to Continental Cement in Buffalo, Iowa, as a calcium and lime substitute for cement.

During the CEI, I observed a 30-cubic-yard container of filter press sludge under the filter press in the WWTP (Attachment 8, Photograph 10). I noted no deficiencies with management of filter press sludge during the CEI.

**Rubber roll grinding swarf** is generated during equipment maintenance on rubber rolls (grinding to remove scratches and surface imperfections on rubber coated rollers used to convey aluminum product through the production process). The waste is collected in 55-gallon containers upon generation and transferred to the nonhazardous waste accumulation area located outside of the CAA. The facility considers the waste to be nonhazardous based on process/product knowledge. Based on the 2022 summary report (Attachment 10), the facility generates 19,240 pounds of rubber roll grinding swarf per year. The waste is transported to Spring Grove in Cincinnati, Ohio, for landfill disposal. The waste was last collected on March 16, 2023. I did not observe rubber roll grinding swarf in accumulation during the CEI.

**PCB contaminated oil** is generated when PCB contaminated oil is removed from facility equipment (historically contaminated units). The waste is collected in 330-gallon containers upon generation and transferred to the CAA. The facility considers the waste to be nonhazardous Toxic Substances Control Act (TSCA)-regulated waste based on process/product knowledge. Based on the 2022 summary report (Attachment 10), the facility generates 71,308 pounds of PCB contaminated oil per year. The waste is transported to Clean Harbors in Deer Park, Texas, Emerald Transformer in Twinsburg, Ohio, or Veolia in Phoenix, Arizona, for incineration.

During the CEI, I observed four 330-gallon containers of PCB contaminated oil in the CAA. Three of the containers had a March 7, 2023, accumulation start date and held a total of 7,345 pounds of PCB contaminated oil. The fourth container had a March 8, 2023, accumulation start

date and held 1,607 pounds of PCB contaminated oil. I noted no deficiencies with management of PCB contaminated oil during the CEI.

**General trash** is generated during production and facility maintenance. It is accumulated within the facility in trash cans or other mobile containers and transferred to roll-offs for offsite disposal. General trash is typically compacted prior to transfer to roll-off, but may be placed directly into roll-off in some circumstances. General trash is considered nonhazardous based on product/process knowledge. The facility generates approximately 1,500 tons of general trash per year. General trash is transported to the Millennium Waste Landfill in Milan, Illinois, for landfill disposal. I observed accumulation of general trash during the CEI and noted no deficiencies.

### 4. Container Accumulation Area

The CAA is an enclosed room with a padlock on the door (Attachment 8, Photographs 1 and 2). I noted the door also had a "No Smoking" sign posted. Mr. Ragona stated that the door remains locked unless personnel are adding, removing, or inspecting the hazardous waste containers in the CAA. I observed tools to be used for spill response (shovel, push broom, kitchen broom, dust pan, etc.) outside the door (Attachment 8, Photograph 6). I observed a spill control station located near the CAA to be used for spill response. The spill control station included mops, mop buckets, absorbents, and other spill equipment (Attachment 8, Photograph 5). The facility utilizes company supplied cellular telephones, in addition to telephones in the CAA, for summoning emergency assistance if needed. I observed other emergency and safety equipment, such as an eye wash station, fire extinguishers, and sprinkler system within or near the CAA.

In the CAA, I observed two 55-gallon HWACs of waste PPE, two 55-gallon HWACs of waste aerosol cans, and one 55-gallon HWAC of printing ink related materials (Attachment 8, Photograph 3). All HWACs were closed, in good condition, labeled with the words "hazardous waste" and an indication of the nature of the hazard, and marked with accumulation start dates. The oldest HWAC accumulation start date was March 29, 2023. I also observed one 3-gallon universal waste (UW) container of mercury vials, four 330-gallon containers of PCB contaminated oil, one container of PCB equipment, and one 55-gallon container of nonhazardous non-PCB ballasts in the CAA.

Mr. Ragona stated that he performs weekly inspections of the CAA. I reviewed the inspection logs from January 5, 2021, through April 11, 2023, and noted that inspections were performed each calendar week. A copy of the inspection log for 2023 is included as Attachment 22. I also obtained a copy of the inspection form for April 11, 2023 (Attachment 23). I noted on page 2 it mentioned an aerosol can crusher. Mr. Ragona stated that the facility utilized an aerosol can crusher previously, but currently ships all waste aerosol cans off site as hazardous waste without crushing.

### 5. Manifests, Bills of Lading, Biennial Report

The facility generated 48 manifests from March 23, 2020, through March 23, 2023. I reviewed all 48 manifests and associated land disposal restriction (LDR) notifications. Copies of select hazardous waste manifests and associated LDR notifications are included in Attachments 12 through 15. Prior to the CEI, I reviewed the 2021 Hazardous Waste Biennial Report, which was

submitted to EPA on February 24, 2022. I noted no deficiencies during my review of manifests, LDR notifications, or the Biennial Report.

I asked Mr. Hylton if the facility has ever had to submit an Exception Report for not receiving manifests back within 45 days. Mr. Hylton stated the last Exception Report was filed with the EPA on October 18, 2022 for hazardous waste manifest 017279820FLE. Mr. Hylton provided copies of the Exception Report and the signed Designated Facility to EPA's e-Manifest System hazardous waste manifest 017279820FLE (Attachment 24).

**6. Personnel Training Requirements**

Personnel training is required by LQG regulations specified in 40 CFR 262.17(a)(7) to ensure that employees are thoroughly familiar with proper waste handling procedures relevant to their responsibilities. I did not request copies of all documents reviewed.

I asked Mr. Hylton what training is provided to Arconic employees who manage hazardous waste (including transfer of HWACs to the CAA). Mr. Hylton stated that all employees who work and manage the hazardous waste at the facility receive Hazardous Waste – Satellite Accumulation Site Inspector (NOA-US-DAV-ENV-WST-IR.01) and Hazardous Waste Handler (NOA-US-DAV-ENV-WST-HR.01) training initially and annually thereafter. I reviewed the training material and noted it included the emergency response provisions of the facility's RCRA Contingency Plan as well as various hazardous waste management topics such as labeling and container management requirements.

I reviewed the job description for Mr. Buckles (FMO Lead/Hazardous Waste Handler) and noted the job description included the skills, education, and duties associated with each job, as required by 40 CFR 262.17(a)(7)(iv)(B).

I asked Mr. Hylton who currently transfers hazardous waste to the CAA. Mr. Hylton stated that Mr. Gary Buckles has held the position of FMO Lead since October 1, 2021. He explained that Mr. Roger Eganhouse, who was the previous FMO Lead, changed jobs in 2021. I obtained a copy of the Annual Training Report that shows the employee's name, position, and training received along with the dates of the training (Attachment 25). I noted in the report that Mr. Eganhouse is listed as Not Active, but received the training on January 7, 2020 and February 2, 2021. Copies of the training attendance sign-in sheets for Mr. Eganhouse (February 2, 2021) and Mr. Buckles (September 27, 2021, and September 26, 2022) are included in Attachment 26.

Mr. Ragona performs inspections of the CAA and conducts environmental training. I asked Mr. Ragona if he receives RCRA training. Mr. Ragona stated that he completes online training from Heritage and Lion Technology. Mr. Ragona supplied copies of his training certificates from 2021, 2022, and 2023 (Attachment 27).

Following the CEI, I contacted Mr. Ragona and asked if the emergency coordinator (EC) for the facility, Mr. Dennis Graham, is in the training plan and if he had received environmental training (that is, training on the Contingency Plan and hazardous waste management). Mr. Ragona stated

that Mr. Graham is in the training plan and has completed all of the required training. I noted no deficiencies with RCRA training during the CEI.

### 7. Preparedness and Prevention and Contingency Plan

As a LQG, Arconic is required to arrange for emergency response with local emergency agencies, to designate an EC for the facility, and maintain a RCRA Contingency Plan. I reviewed the contingency plan, dated July 2020, during the CEI. The RCRA Contingency Plan is part of the facility's Release Prevention, Control, and Countermeasure (RPCC) plan. I noted that the RPCC plan was certified by Professional Engineer, Rebecca L. Svatos (Registration Number 14907) on July 28, 2020.

I noted the RCRA Contingency Plan included a description of actions needed to respond to fires and explosions and spills, a description of arrangements with the local emergency agencies, a list of emergency response equipment (including capabilities and location), and a complete evacuation plan with a description of the signals used, as required by 40 CFR 262.17(a)(7) Referencing 262.261(a, c, e, and f).

The RCRA Contingency Plan included a 24/7 emergency telephone number and the telephone number of the primary EC, Dennis Graham, as required by 40 CFR 262.17(a)(7) Referencing 262.261(d). It also included a Quick Reference Guide (Attachment 28), as required by 40 CFR 262.17(a)(7) Referencing 262.262(b). Mr. Hylton stated that the RCRA Contingency Plan had been delivered to all emergency agencies (including the Riverdale and Bettendorf fire and police departments, Genesis Medical Center, Scott County Sheriff, and Scott County Emergency Management Agency), as required by 40 CFR 262.17(a)(7) Referencing 262.262(a). I noted no deficiencies with content of the RCRA Contingency Plan during the CEI.

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

EPA regulations in 40 CFR Part 265, Subparts AA, BB, and CC apply to LQGs. If a LQG manages hazardous waste with an organic concentration greater than 10 parts per million by weight (ppmw), the standards specified in Subpart AA apply to hazardous waste air emissions from certain process used in distillation, fractionation, solvent extraction, thin-film evaporation, air stripping, or steam stripping. Arconic is not subject to the Subpart AA regulations because the facility does not have any of the process vents listed above.

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

The standards found in Subpart CC apply to LQGs that manage hazardous waste in containers with organic compounds (VOC) concentration that exceeds 500 ppmw. The Subpart CC standards are applicable because the facility accumulates hazardous waste that contains VOCs in 55-gallon hazardous waste accumulation containers. During the CEI, I determined that Arconic meets the Subpart CC requirements for containers by using Container Level 1 controls (hazardous waste accumulation containers smaller than 122 gallons that are Department of

Transportation [DOT]-approved). I noted no concerns with management of hazardous waste per the Subpart CC air emissions requirements.

**9. Summary of Preliminary Findings**

In summary, as part of the CEI, I made the following preliminary finding:

1) Failure to label used oil storage container with the words "used oil," as required by 40 CFR 279.22(c)(1)

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

William F Starks
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_____ Date: _____

William F. Starks
Environmental Consultant
CLAENE Group, LLC.

AMBER WHISNANT
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Date: 2023.06.21 16:18:22 -05'00'

_____ Date: _____

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

Attachments:

1. Notification Acknowledgement/Verification Report (2 Pages)
2. Subtitle C Site Identification Form, January 5, 2023, and Acceptance Email (5 pages)
3. Receipt for Documents and Samples (1 Page)
4. Confidentiality Notice (1 Page)
5. Notice of Preliminary Findings (NOPF) (1 Page)
6. Facility Diagram (1 Page)
7. Google Maps Aerial Image of the Facility (1 Page)
8. Photographic Documentation (27 Photos and Photolog) (18 Pages)
9. 2021 Hazardous Waste Biennial Report (10 Pages)
10. 2022 Summary Report (13 Pages)
11. 2023 Summary Report (4 Pages)
12. Manifest 016978725FLE, February 22, 2023, and Associated LDR Form (3 Pages)
13. Manifest 017841618FLE, March 16, 2023, and Associated LDR Form (2 Pages)
14. Manifest 017841619FLE, March 16, 2023, and Associated LDR Form (2 Pages)
15. Manifest 016488985FLE, December 28, 2022, and Associated LDR Form (3 Pages)
16. Used Oil Bill of Lading, April 10, 2023 (1 Page)
17. 2021 Used Oil Biennial Report (1 Page)
18. Used Oil Analysis Plan (3 Pages)
19. Rebuttal Presumption for Used Oil (1 Page)
20. Used Oil Analyses Halogen Testing Log, December 12, 2022 through April 5, 2023 (1 Page)
21. Used Oil Transfer Log for 2023 (3 Pages)
22. Hazardous Waste CAA Inspection Log for 2023 (1 Page)
23. Hazardous Waste CAA Inspection Form, April 11, 2023 (2 Pages)
24. Exception Report, October 18, 2022, and Associated Hazardous Waste Manifest (3 Pages)
25. Annual Training Report (1 Page)
26. Training Sign-in, February 2, 2021; September 27, 2021; and September 26, 2022 (3 Pages)
27. Paul Ragona Training Certificates, February 10, 2021; February 8, 2022; and February 7, 2023 (3 Pages)
28. RCRA Quick Reference Guide (9 Pages)