REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

FAIRCAST INC.
905 W. Depot Avenue
Fairfield, Iowa 52556
(641) 209-4108

EPA ID Number: IAR000830018

On

March 16 and 17, 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 Faircast Inc. (Faircast), at 905 W. Depot Avenue, Fairfield, 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

Faircast:

Rod Jokerst, Plant Manager
Jennifer VanCamp, Materials and Planning Manager
Dean Jensen, Technical Services Director
Kyle Larsen, Crib Attendant

Toeroek Team:

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

INSPECTION PROCEDURES

Prior to the CEI at Faircast on March 16, 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, and explained the purpose of the CEI to the receptionist. The receptionist stated that the person who manages environmental matters, Mr. Jensen, was out sick. The receptionist explained that she would contact someone to assist me. Mr. Jokerst arrived in the lobby approximately five minutes later. After a brief introduction, Mr. Jokerst directed me to a conference room where I conducted an entry briefing with him.

During the entry briefing, I presented my business card and EPA credentials to Mr. Jokerst. I explained the scope and procedures for the CEI. I explained the facility's right to make confidentiality claims and provided a Notice Regarding Proprietary/ Confidential Business Information. I stated that at the conclusion of the CEI, he would be presented with a Confidentiality Notice (Notice) with which he could make or not make a claim of confidentiality for the facility. I also provided Mr. Jokerst a copy of U.S. Federal Codes 1001 and 1002, concerning communication of false statements and documents to federal inspectors, and RCRA Section 3007, explaining EPA's inspection authority. Mr. Jokerst read both of these documents.

Mr. Jokerst stated that he would be leaving the facility prior to the conclusion of the CEI, and contacted Ms. VanCamp to join the CEI. Upon Ms. VanCamp's arrival, I provided her a copy of U.S. Federal Codes 1001 and 1002, which she read. I also received information from Mr. Jensen via telephone. During the CEI, I read U.S. Federal Codes 1001 and 1002 to Mr. Jensen and he acknowledged that he understood them.

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
- U.S. EPA Small Business Resources Information Sheet

- E-Manifest Fact Sheet: Generators
- Small Quantity Generator Reminder to Re-notify
- 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
- 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 Mr. Jokerst (Attachment 1). Based on this review, as well as observations during the CEI, I updated the Site Contact Information on the Verification Report to include Mr. Jensen's information. I changed the Hazardous Waste Generator Status to Small Quantity Generator (SQG) of hazardous waste (generating between 100 and 1,000 kilograms [kg] of hazardous waste per month). I also revised the Description of Hazardous Wastes section of the Verification Report to add D001 and delete D008 EPA hazardous waste codes.

I conducted the visual inspection and most of the records review on March 16, 2023, accompanied by Ms. VanCamp. I returned to the facility on March 17, 2023, to complete the records review. During the records review, I reviewed facility documentation such as inventory reports, inspection logs, shipping records, 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 March 17, 2023, I conducted an exit briefing with Ms. VanCamp and Mr. Jensen (via teleconference). During the exit briefing, I provided a Receipt for Documents and Samples, which Ms. VanCamp signed, acknowledging receipt (Attachment 2). I provided Ms. VanCamp the Notice, which she signed indicating no confidential business information had been provided (Attachment 3). I then provided Ms. VanCamp a Notice of Preliminary Findings (NOPF), which she signed to acknowledge receipt (Attachment 4).

A diagram of the facility was obtained during the CEI and is in Attachment 5. An aerial photograph of the facility was downloaded after the CEI and is in Attachment 6. The 11 photographs taken during the CEI are included in Attachment 7.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

Faircast is a ductile and gray iron foundry that produces castings for the agricultural industry. Raw materials include scrap iron, casting returns, steel, coke, copper, manganese, and sand.

Faircast is divided into eight main areas: cupola, electric melt (EM), molding, screening, grinding, shipping, maintenance, and office. During the CEI, Messrs. Jokerst and Jensen (via telephone) described the Faircast processes at each of the eight areas.

The foundry casting process involves placing the raw materials into one of two furnaces (EM or cupola furnaces) to melt. The molten metal is then poured into a sand mold. After cooling, the sand mold is broken away from the casting (product) in a "shake out" operation. The product is then transferred to the grind room for finishing. Finished products are palletized or boxed and shipped to the customer. Faircast does not perform painting or surface coating.

Most of the products manufactured at the facility are cast using the cupola furnace. Cupola furnace baghouse (BH) dust was previously considered to be D006 and D008 characteristic hazardous waste. However, the facility installed a calcium silicate-based reagent system prior to the BH in late 2010 or early 2011 which renders the BH dust nonhazardous. Specifically, the reagent stabilizes the cadmium and lead constituents such that the cupola furnace BH dust passes the toxicity characteristic leaching procedure (TCLP) test. The cupola BH dust is collected in an outdoor 20-cubic-yard container on the west end of the facility, and transported to the Southeast Iowa Multi-County Solid Waste Agency (SEMCO) landfill for disposal.

Like cupola furnace BH dust, EM furnace BH dust was previously considered to be D006 and D008 characteristic hazardous waste. However, the facility installed a calcium silicate-based reagent system prior to the EM furnace BH in 2021 which renders the BH dust nonhazardous. EM furnace BH dust is transferred to the northwest corner of the facility prior to collection by Safety-Kleen Systems, Inc. (Safety-Kleen).

Cupola slag is generated from maintenance of the cupola furnace and considered to be nonhazardous waste based on product/process knowledge and testing. It is transferred outside on the west end of the facility.

The cores (made with a combination of sand and epoxy) utilized in the molding process are purchased from Cores for You in Hamilton, Illinois. Waste core butts are considered to be nonhazardous waste, and are transferred outside on the west end of the facility.

In the molding area, molten metal is poured into green sand molds and allowed to cool. After cooling, the castings are transferred to the screening area where they are shaken out of the molds. Wastes from the screening area include spent molding sand, BH dust from the Disa cyclone unit (Disa BH dust), and refractory, which are each considered to be nonhazardous waste based on product/process knowledge and testing. Spent molding sand, Disa BH dust, and refractory are transferred outside on the west end of the facility.

Castings are transferred to the grinding area, where sand and metal burrs are removed. This is accomplished by grinding and/or shot blasting. A separate dust collector controls emissions from the grinding area. The grinding BH dust is considered to be nonhazardous waste based on product/process knowledge and testing. Grinding dust is transferred outside on the west end of the facility. After grinding, the castings are packaged for shipment.

The maintenance area generates used oil, used oil filters, spent fluorescent "green tip" lamps, spent metal halide lamps, spent lead-acid batteries, waste nickel-cadmium (Ni-Cd) batteries, spent parts washer solvent, and aerosol can waste. Used oil and used oil filters are generated from the maintenance of facility equipment and are managed as used oil according to provisions of Title 40 *Code of Federal Regulations* (40 CFR) Part 279. Spent fluorescent lamps generated during facility maintenance are considered to be nonhazardous waste based on product knowledge and disposed in the general trash. Spent metal halide lamps are managed as universal waste according to provisions of 40 CFR §273 and are shipped off site for recycling. Waste Ni-Cd batteries are managed as universal waste according to provisions of 40 CFR Part 273 and are shipped off site for recycling. Spent lead-acid batteries are exchanged on a one-for-one basis at a local auto supply store.

The maintenance department has one parts washer used for general cleaning. Spent parts washer solvent is considered to be hazardous waste (D039) based on product/process knowledge. Empty aerosol cans are punctured into a 55-gallon satellite accumulation container (SAC). The facility has not had a shipment of aerosol can waste to date. Punctured and drained aerosol cans are managed as scrap metal for recycling. Scrap metal is considered exempt from the definition of hazardous waste when recycled.

Faircast purchased the facility from Fairfield Castings on June 28, 2017. Production began as Faircast on July 5, 2017. The facility has been working with the Iowa Department of Natural Resources (DNR) for clean-up of an onsite closed landfill. Mr. Jensen stated the landfill is located approximately 0.6 miles west of the facility, and there is an easement to the landfill adjacent to the railroad tracks. The landfill was closed by Iowa DNR prior to Faircast purchasing the facility.

Mr. Jensen stated that since the closure of the landfill, the facility has been accumulating the nonhazardous wastes that were previously disposed in the landfill (cupola slag, spent molding sand, EM Baghouse dust, grinding BH dust, waste core butts, and floor sweeping residue) in the Backyard, on the west side of the facility. Mr. Jensen explained that Faircast has been in contact with the Iowa DNR exploring possible solutions for disposal of the nonhazardous wastes, including Beneficial Use. To date, no offsite shipments of the previously-landfilled nonhazardous wastes have occurred since Faircast purchased the facility.

The facility has been operating as a foundry at its current location since 1908, and consists of approximately 245,900 square feet under roof. Faircast employs approximately 104 full-time personnel. Production personnel (approximately 90) work one of two shifts (6:00 a.m. to 3:00 p.m. and 10:00 p.m. to 6:00 a.m.) on a Monday through Friday schedule. Production personnel may perform additional work, as needed to meet demand. Maintenance personnel (approximately 14) work one of three shifts (7:00 a.m. to 3:00 p.m., 3:00 p.m. to 11:00 p.m., and 11:00 p.m. to 7:00 a.m.) on a 24/7 basis. Faircast's primary North American Industrial Classification System (NAICS) code is 331551 (Iron Foundries).

On July 9 and 10, 2018, Faircast was inspected by an EPA contractor. Following the CEI, the inspector left the following preliminary findings:

- Failure to include a description of the actions needed to respond to fires, explosions, or releases of hazardous waste in the RCRA Contingency Plan, 40 CFR §262.17(a)(6) Referencing 262.261(a).
- Failure to keep the list of emergency coordinators up to date in the RCRA Contingency Plan, as required by 40 CFR §262.17(a)(6) Referencing 262.261(d).
- Failure to label hazardous waste satellite accumulation container with the words "hazardous waste", as required by 40 CFR §262.15(a)(5)(i).
- Failure to label hazardous waste satellite accumulation container with an indication of the nature of the hazard, as required by 40 CFR §262.15(a)(5)(ii).
- Failure to adequate aisle space for emergency response in a less than 90-day hazardous waste container accumulation area, as required by 40 CFR §262.17(a)(6) Referencing 262.255.
- Failure to perform weekly inspections of a less than 90-day hazardous waste container accumulation area, as required by 40 CFR §262.17(a)(1)(v).
- Failure to label four hazardous waste accumulation containers with the words "hazardous waste", as required by 40 CFR §262.17(a)(5)(i)(A).
- Failure to label four hazardous waste accumulation containers with an indication of the nature of the hazard, as required by 40 CFR §262.17(a)(5)(i)(B).
- Failure to label four hazardous waste accumulation containers with an accumulation start date, as required by 40 CFR §262.17(a)(5)(i)(C).
- Accumulation of hazardous waste greater than 90 days, as required by 3005 of RCRA.
- Accumulation of universal waste batteries for longer than one year, as required by 40 CFR §273.15(a).
- Failure to demonstrate the length of time of accumulation of universal waste batteries, as required by 40 CFR §273.15(c).
- Failure to label universal waste battery accumulation container with the words "universal waste batteries," or "waste batteries," or "used batteries, as required by 40 CFR §273.14(a).
- Failure to adequately train personnel in the management of universal waste batteries, as required by 40 CFR §273.16.
- Failure to make a hazardous waste determination on waste core butts, floor sweep residue, and spent molding sand at the point of generation; and failure to make an adequate hazardous waste determination on cupola slag, as required by 40 CFR §262.11(a).

Of these findings, failure to demonstrate the length of time of accumulation of universal waste batteries, as required by 40 CFR §273.15(c), and failure to label universal waste battery accumulation container with the words "universal waste batteries," or "waste batteries," or "used batteries, as required by 40 CFR §273.14(a), were repeated during this inspection.

2. RCRA Status

The Verification Report provided by EPA (Attachment 1) indicates that Faircast is a large quantity generator (LQG) of hazardous waste (generating more than 1,000 kg of hazardous waste per month). The facility supplied a copy of a GENR Waste Report from Clean Harbors that details waste shipped by the facility from August 27, 2019 to December 15, 2022 (Attachment 8). The last shipment of EM BH dust as a hazardous waste occurred on November 5, 2021. Following that shipment, EM BH dust was managed as nonhazardous waste. Between August 2019 and December 2022, the facility generated 791 gallons of spent parts washer solvent (D039) weighing 6,469.87 pounds (2,934.68 kg). I calculated the average density of spent parts washer solvent as approximately 8.18 pounds (3.71 kg) per gallon. Spent parts washer is generated during parts washer maintenance. From December 2021 (after last shipment of EM BH dust) through December 2022, the facility generated approximately 20 gallons (164 pounds/74 kg) to 23 gallons (188 pounds/85 kg) of spent parts washer solvent approximately every 4 weeks. Occasionally, two shipments occur in the same calendar month, such as in May 2022 when a total of 40 gallons (327 pounds/148 kg) were generated. The facility also generated 46 gallons (376 pounds/170.55 kg) of spent parts washer solvent in March 2023 (Attachment 9).

Because the facility occasionally generates more than 100 kg of spent parts washer solvent per calendar month, I inspected the facility 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.

Following the CEI, I spoke with Mr. Jensen on May 11, 2023, concerning the facility's generator status. Mr. Jensen stated facility representatives thought Faircast was a SQG of hazardous waste and did not need to meet the LQG of hazardous waste requirements. He added that if spent parts washer solvent is determined to be a nonhazardous waste, the facility would operate as a very small quantity generator (VSQG) of hazardous waste.

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 Ms. VanCamp and Messrs. Jensen and Jokerst, the visual inspection, and my review of available documentation. I received additional information from Mr. Jensen via telephone. I also received additional information from Mr. Larsen during the CEI. I provided Mr. Larsen a copy of U.S. Federal Codes 1001 and 1002, which he read.

Spent parts washer solvent is generated during maintenance of the facility's parts washer. Spent parts washer solvent is transferred to the service truck upon generation and immediately transferred off site. The facility considers the waste to be hazardous (D039) by product/process knowledge. The facility generates between 0 gallons (when the parts washer is not serviced) and 46 gallons (376 pounds/170.55 kg) of spent parts washer solvent per calendar month. The waste is collected by Safety-Kleen in Des Moines, Iowa, and transported to its facility for recycling. The waste was last collected on March 9, 2023 (Attachment 9).

Ms. VanCamp provided a copy of the safety data sheet (SDS) for Safety-Kleen Premium Solvent (Attachment 10). The SDS identifies the solvent as a petroleum distillate with a flash point greater than 148 degrees Fahrenheit (°F) and no characteristic or listed constituents.

Mr. Jensen stated the solvent is utilized to degrease facility equipment. I asked Mr. Jensen if Faircast utilizes any additional cleaners (for example, brake cleaner) while using the parts washer. Mr. Jensen stated that the facility does not utilize additional cleaners or solvents while using the parts washer.

Mr. Jensen telephoned Safety-Kleen and asked why spent parts washer solvent has a D039 characteristic hazardous waste code applied to the waste. He then explained that Safety-Kleen applies the D039 waste code unless the facility signs a statement stating that they do not add D039 characteristic waste to the parts washer solvent.

Waste aerosol cans are generated during facility equipment maintenance. Waste aerosol cans are considered hazardous (D001) based on product knowledge. Upon generation, the waste is transferred to an aerosol can waste 55-gallon SAC with an aerosol can puncture device affixed to the lid. After puncturing, empty aerosol cans are managed as scrap metal and transferred to a scrap metal container. According to Mr. Jensen, the facility does not track waste aerosol cans, and the generation rate is not known. Scrap metal is transported to M. Shrago and Son in Oskaloosa, Iowa, for recycling. I did not observe waste aerosol cans during the CEI.

I explained to Mr. Jensen and Ms. VanCamp that waste aerosol cans could be managed as universal waste according to provisions of 40 CFR Part 273 until the waste aerosol cans are punctured. I provided compliance assistance materials to Ms. VanCamp concerning universal waste aerosol cans. I noted no deficiencies with management of waste aerosol cans.

Aerosol can waste is generated when aerosol cans are punctured into a 55-gallon SAC in the West End Parts area. The facility considers aerosol can waste to be hazardous (D001) based on product knowledge. The facility generates less than one pound of aerosol can waste per month. Aerosol can waste has not been shipped to date.

In a locked cage in the West End Parts area, I observed a 55-gallon SAC of aerosol can waste (Attachment 7, Photograph 3). The 55-gallon SAC was at the point of generation, under control of an operator, closed, labeled with the words “hazardous waste,” and labeled with an indication of the nature of the hazard (Attachment 7, Photograph 4). The SAC held approximately 15 gallons of aerosol can waste. I noted no deficiencies with management of aerosol can waste.

Cupola furnace BH dust is generated by the cupola furnace air filtration system. The facility considers cupola furnace BH dust to be nonhazardous based on product/process knowledge and testing. The facility generates approximately 500 pounds of cupola furnace BH dust per month. The waste is collected in the #11 baghouse and transferred to 1-cubic-yard bags under the baghouse. Full 1-cubic-yard bags are transferred to the Backyard for accumulation. The waste is transported to SEMCO for landfill disposal. The date of the last shipment of cupola furnace BH dust was not obtained during the CEI.

Ms. VanCamp provided a copy of Eurofins Analytical Report for cupola furnace BH dust, dated December 17, 2019 (Attachment 11). According to this report, the sample from #11 baghouse did not exceed TCLP metals limits.

EM furnace BH dust is generated by the EM furnace air filtration system. The facility considers EM furnace BH dust to be nonhazardous based on product/process knowledge and testing. The facility generates approximately 100 pounds of EM furnace BH dust per month. The waste is collected in the #4 baghouse and transferred to 1-cubic-yard bags under the baghouse. Full 1-cubic-yard bags are transferred to mud room where water is added, then transferred to the Backyard for accumulation. Nonhazardous EM furnace BH dust is transported to Safety-Kleen for treatment/disposal. The last two shipments of EM furnace BH dust as hazardous waste were June 11, 2020 and November 5, 2021 (Attachment 12). The date of the last shipment of nonhazardous EM furnace BH dust was not obtained during the CEI.

Grinding BH dust is generated by the grinding operations air filtration system. The facility considers grinding BH dust to be nonhazardous based on product/process knowledge and testing. The facility generates approximately 100 pounds of grinding BH dust per month. The waste is collected in the #5 and #8 baghouses and transferred to 1-cubic-yard bags under the baghouses. Full 1-cubic-yard bags are transferred to mud room where water is added, then transferred to the Backyard for accumulation. The facility has not shipped grinding BH dust off site since Faircast purchased the facility on June 28, 2017.

Ms. VanCamp provided a copy of Eurofins Analytical Report for grinding BH dust, dated December 17, 2019 (Attachment 11). According to this report, the samples from #5 and #8 baghouses did not exceed TCLP metals limits.

During the CEI, I observed two, 1-cubic-yard bags of grinding BH dust under the #5 and #8 baghouses. I noted no deficiencies with management of grinding BH dust during the CEI.

Waste core butts are generated after castings are separated from the cores. The facility considers waste core butts to be nonhazardous based on product/process knowledge. The facility generates approximately 50 pounds of waste core butts per month. The waste is transferred to the Backyard for accumulation. The facility has not shipped waste core butts off site since Faircast purchased the facility on June 28, 2017.

Cupola slag is generated from maintenance of the cupola furnace. The facility considers cupola slag to be nonhazardous based on product/process knowledge and testing. The facility generates approximately 1,500 pounds of cupola slag per month. The is transferred upon generation to the Backyard for accumulation. The facility has not shipped cupola slag off site since Faircast purchased the facility on June 28, 2017.

Ms. VanCamp provided a copy of a Clean Harbors Analytical Report for cupola slag, dated July 28, 2022 (Attachment 13). According to this report, the sample did not exceed TCLP limits.

Floor sweeping residue is generated during facility maintenance. It is collected in a floor sweeper. The facility considers floor sweeping residue to be nonhazardous based on product/process knowledge. The facility generates approximately 200 pounds of floor sweeping

residue per month. After floor sweeping, the sweeper is taken to the Backyard and cleaned out with water. The facility has not shipped floor sweeping residue off site since Faircast purchased the facility on June 28, 2017.

Spent molding sand is generated during the "shake out" process. Molding sand that is reusable is transferred to the Backyard to be used as feedstock in the molding process. Spent molding sand consists of sand that is no longer usable in the molding process and is transferred to another area of the Backyard for accumulation. Spent molding sand is considered nonhazardous based on product/process knowledge and testing. The facility generates approximately 2,000 pounds spent molding sand per month. The facility has not shipped spent molding sand off site since Faircast purchased the facility on June 28, 2017.

Ms. VanCamp provided a Eurofins Analytical Reports dated May 14, 2021, and April 4, 2022, for spent molding sand (Attachments 14 and 15, respectively). According to these reports, the samples did not exceed TCLP limits.

Disa BH dust is generated by the molding process operations air filtration system. The facility considers Disa BH dust to be nonhazardous based on product/process knowledge and testing. The facility generates approximately 1,000 pounds of Disa BH dust per month. It is collected in the #7 and #10 baghouses and transferred to 1-cubic-yard bags under the baghouses. Full 1-cubic-yard bags are transferred to mud room where water is added, then transferred to the Backyard for accumulation. The facility has not shipped Disa BH dust off site since Faircast purchased the facility on June 28, 2017.

Ms. VanCamp provided a copy of Eurofins Analytical Report, dated December 17, 2019, for Disa BH dust (Attachment 11). According to this report, the samples from #7 and #10 baghouses did not exceed TCLP metals limits.

Refractory is generated during maintenance of the ladles in the molding process. The facility considers refractory to be nonhazardous based on product/process knowledge. The facility generates approximately 1,500 pounds of refractory per month. Refractory is magged (process of passing magnet over the waste to extract metals) after generation. Recovered metals are returned to the casting process and the remaining refractory is transferred to the Backyard for accumulation. The facility has not shipped refractory off site since Faircast purchased the facility on June 28, 2017.

Used lamps are generated during facility maintenance and are transferred to an area by the West Dock. The facility considers used lamps to be nonhazardous or hazardous by product knowledge. Nonhazardous used lamps (fluorescent "green tip" lamps) are transferred to the general trash. Hazardous used lamps (metal halide) are managed as universal waste according to provisions of 40 CFR Part 273, and are transferred to the West Dock area for accumulation. The facility generates approximately 50 nonhazardous used fluorescent lamps per month and approximately six hazardous used metal halide lamps per year. Nonhazardous used lamps are transported by Waste Management to the SEMCO landfill in Richland, Iowa, for disposal. Universal waste metal halide lamps are collected by Safety-Kleen for recycling.

Ms. VanCamp provided a copy of the product sheet for the nonhazardous fluorescent lamps (Phillips Alto II T8 lamps) (Attachment 16). According to the product sheet, the lamps are TCLP compliant for mercury and can be managed as nonhazardous waste.

During the CEI, I observed three used lamp containers by the West Dock. I noted that all of the used lamps were Phillips Alto II T8 lamps (nonhazardous fluorescent lamps). I did not observe used metal halide lamps (universal waste lamps) in accumulation during the CEI. I noted no deficiencies with management of used lamps during the CEI.

Used batteries include alkaline and Ni-Cd batteries generated during facility equipment maintenance. They are transferred to a 5-gallon universal waste battery accumulation container located in the Parts Crib. The facility manages used batteries as universal waste according to provisions of 40 CFR Part 273. The facility generates approximately 22 pounds of universal waste batteries per year. The waste is transported to Clean Harbors in La Porte, Texas, or Reidsville, North Carolina, or Spring Grove Resource Recovery in Cincinnati, Ohio, for recycling. The last shipment of universal waste batteries was on December 15, 2022.

During the CEI, I observed a 5-gallon universal waste battery accumulation container in the Parts Crib (Attachment 7, Photograph 5 through 8). The universal waste battery accumulation container held 11 Ni-Cd batteries. The universal waste battery accumulation container was not labeled with the words "universal waste batteries," or "waste batteries," or "used batteries," as required by 40 CFR 273.14(a) **(NOPF No. 1)**, and was not dated or otherwise tracked to demonstrate the length of time of accumulation, as required by 40 CFR 273.15(c) **(NOPF No. 2)**.

I explained these preliminary findings to Ms. VanCamp and Mr. Larsen during the visual inspection. I asked Mr. Larsen how long the used batteries have been in accumulation. He stated that the used batteries have not been in accumulation longer than one month. Based on Mr. Larsen's statement, it does not appear that the used batteries have been in accumulation longer than one year. Prior to leaving the area, Mr. Larsen marked the universal waste battery container with the words "used batteries," and a February 15, 2023, accumulation start date (Attachment 7, Photograph 9).

Used oil and used oil filters are generated during servicing of fork trucks and facility equipment. Used oil is transferred into a used oil storage container that is covered with a grate. This container is hard-piped to a 250-gallon used oil aboveground storage tank (AST). Used oil filters are punctured and hot drained prior to transfer to a 55-gallon used oil filter storage container. Used oil and used oil filters are managed as used oil according to provisions of 40 CFR Part 279. The facility generates approximately 1,000 gallons of used oil and approximately 120 used oil filters per year. Used oil and used oil filters are transported to Rilco Fluid Care in Rock Island, Illinois, for recycling. Used oil was last collected on November 17, 2022 (Attachment 17).

During the CEI, I observed a 500-gallon used oil AST in the Oil Storage Room (Attachment 7, Photograph 1). The used oil AST appeared to be structurally sound with no apparent leaks, was marked with the words "used oil," and held approximately 63 gallons of used oil.

I also observed a 55-gallon used oil filter storage container in the Fork Truck Shop (Attachment 7, Photograph 2). The used oil filter storage container appeared to be structurally sound, was marked with the words "used oil filters," and held approximately 55 gallons of used oil filters. I noted no deficiencies with management of used oil and used oil filters during the CEI.

Scrap metal consists of metal wastes generated during equipment maintenance and aerosol can puncturing that cannot be used as feed stock. The facility considers scrap metal to be excluded from the definition of solid waste when recycled. I did not obtain a generation rate for scrap metal during the CEI. Scrap metal is transferred to a scrap metal accumulation container at the East Dock area, and is transported to M. Shrago and Son in Oskaloosa, Iowa, for recycling.

General trash consists of processing waste, food waste, and other office-type waste generated at during facility maintenance. General trash is accumulated in containers throughout the facility and transferred to a 4-cubic-yard container on the south side of facility. General trash is also transferred to a trash compactor with a 30-cubic-yard container on the west side of the facility. The facility considers general trash to be nonhazardous based on product knowledge. The facility generates approximately 8 cubic yards of general trash per week, and 30 cubic yards from the compactor every 2 to 3 months. General trash is transported by Waste Management to the SEMCO landfill in Richland, Iowa, for disposal. I did not observe any deficiencies related to general trash during the CEI.

4. Required Response Equipment and Hazard Management

Per 40 CFR 262.15(a)(7) and 262.16(b)(8), a SQG must operate to minimize possibility of a fire, explosion, or spill, and must maintain emergency response equipment. During the visual inspection, I observed automatic sprinklers, fire extinguishers at multiple locations around the facility, and an overpack container with absorbent material and spill kit outside of the Oil Room. I also observed telephones in operating and waste management areas, as well as fire alarm pull stations. I did not observe any deficiencies related to emergency response equipment.

5. CAAs

Ms. VanCamp accompanied me to the facility's less-than-270-day CAA (Attachment 7, Photographs 10 and 11). The CAA has not held hazardous waste since the last shipment of hazardous EM furnace BH dust on November 5, 2021.

According to Ms. VanCamp, the facility inspects the CAA weekly and documents inspections on a weekly preventative maintenance (PM) sheet. Ms. VanCamp provided the weekly inspection PMs. I reviewed all PM sheets back to March 2020 and did not identify any gaps longer than 1 week. I did not observe a telephone in the CAA, so I asked Ms. VanCamp how the personnel inspecting the area would summon emergency assistance. Ms. VanCamp stated that personnel have company supplied radios to summon emergency assistance. I did not identify any deficiencies related to hazardous waste management in the CAA.

6. Manifests

I reviewed the approximately 33 manifests generated by the facility from April 2020 to present. Facility records included LDR notices regarding all waste streams. Copies of manifests obtained during the CEI are in Attachments 9 and 12. I did not identify any deficiencies related to manifest preparation or retention.

7. Preparedness and Prevention

Per 40 CFR 262.16(b)(9)(i), a SQG must have identified an emergency coordinator (EC) familiar with facility operations. According to Mr. Jensen, he is the primary EC, and Mr. Jokerst serves as the alternate.

Per 40 CFR 262.16(b)(9)(ii), a SQG must post by the telephone the name of and contact information regarding the EC; the phone number of the fire department; and locations of fire extinguishers, spill response equipment, and, if present, fire alarms ("emergency response equipment"). During my inspection, I observed this information posted by the telephone in the conference room. Ms. VanCamp stated this information is posted by all of the manager's 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. The SQG must also document those arrangements. During my review of the facility's RCRA contingency plan, I confirmed that it included documentation of arrangements with the Fairfield Fire Department, Police Department, and Jefferson County Health Center.

Mr. Jensen stated that the facility will maintain the RCRA Contingency Plan as a best practice and to address other information also required by Occupational Safety and Health Administration (OSHA).

8. 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. VanCamp if hazardous waste training occurs. She said that all employees attend annual hazardous waste training at the awareness level, including emergency procedures and basic container management. I did not identify any deficiencies related to employee training.

9. Summary of Preliminary Findings

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

1) Failure to label universal waste battery container with the words "universal waste batteries," or "waste batteries," or "used batteries," as required by 40 CFR 27314(a)
2) Failure to date or otherwise track to demonstrate the length of time of accumulation of universal waste batteries, as required by 273.15(c)

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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William F. Starks
Environmental Consultant
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. Notice of Preliminary Findings (NOPF) (1 Page)
5. Facility Diagram (1 Page)
6. Google Maps Aerial Image of the Facility (1 Page)
7. Photographic Documentation (11 Photos and Photolog) (8 Pages)
8. GENR Waste Report (20 Pages)
9. Hazardous Waste Manifest 008691122SKS and Associated Certificate of Disposal, Dated March 9, 2023 (2 Pages)
10. SDS for Safety-Kleen Premium Solvent (9 Pages)
11. Eurofins Analytical Report, Dated December 17, 2019 (17 Pages)
12. Hazardous Waste Manifests and Associated Certificates of Disposal, Dated June 11, 2020 and November 5, 2021 (5 Pages)
13. Clean Harbors Analytical Report, Dated July 28, 2022 (10 Pages)
14. Eurofins Analytical Report, Dated May 14, 2021 (19 Pages)
15. Eurofins Analytical Report, Dated April 4, 2022 (21 Page)
16. Phillips Alto II Product Sheet (2 Pages)
17. Used Oil Manifests (3 Pages)