

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

ANR PIPELINE CO-COMPRESSOR

2795 Locust Avenue
Birmingham, Iowa 52535
319-498-2270

EPA ID Number: IAD980688220

On

February 28, 2024

By

TOEROEK ASSOCIATES, INC.

For

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

INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division/Chemical Branch/RCRA Section (ECAD/CB/RCRA) of the U.S. Environmental Protection Agency (EPA) Region 7, Toeroek Associates, Inc., and its subcontractor CLAENE Group (Toeroek team) conducted a hazardous waste compliance evaluation inspection (CEI) at ANR Pipeline Co-Compressor (ANR) at 2795 Locust Avenue in Birmingham, 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 requirements, used oil management, and universal waste requirements, as applicable. This report and its attachments present the results of the CEI.

PARTICIPANTS

ANR:

Mark Dorothy, EIC Technician
Shane Vice, Mechanical Technician

Toeroek Team:

Clifford Nelles, Inspector, 816-213-5192

INSPECTION PROCEDURES

Prior to the CEI at ANR on February 28, 2024, I conducted a drive-by visual inspection. I did not observe any areas of concern during the drive-by. At approximately 9:20 a.m., I approached a fenced gate with a call box. I entered the number listed on the call box and spoke with an operator. I identified myself to the operator and explained the purpose of the CEI. The operator opened the gate and instructed me where to park and which building to enter. I entered the building and was met by Messrs. Dorothy and Vice. After a brief introduction and exchange of business cards, Mr. Vice requested that I take a required visitor safety orientation. I reviewed the safety orientation with Mr. Vice, and then proceeded to conduct an entry briefing with Messrs. Dorothy and Vice.

During the entry briefing, I presented my EPA credentials to Messrs. Dorothy and Vice. I explained the scope and procedures for the CEI. I explained the facility's right to make confidentiality claims for any or all the information obtained and provided a Notice Regarding Proprietary/Confidential Business Information. I stated that at the conclusion of the CEI, Mr. Dorothy 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 Messrs. Dorothy and Vice a copy of U.S. Federal Codes 1001 and 1002, concerning communication of false statements and documents to federal inspectors, and RCRA Section 3007, explaining EPA's inspection authority, both of which they read.

Copies of the following documents were left with Mr. Dorothy during the inspection:

- RCRA Facility Access Information Sheet
- RCRA Section 3007
- U.S. Federal Codes 1001 and 1002
- Notice Regarding Proprietary/Confidential Business Information

The following documents were left electronically with Messrs. Dorothy and Vice.

- E-Manifest Fact Sheet: Generators
- Managing your Hazardous Waste: A Guide for Small Businesses
- U.S. EPA Small Business Resources Information Sheet
- Solvent-Contaminated Wipes Final Rule Summary Chart
- IDNR Excluded Solvent-Contaminated Wipes Rule: Management Practices for Wipes, Rags, and Shop Towels
- Recycling Electronics: A Guide for Businesses
- Lead-Based Paint Activities: Handling and Disposal
- Battery Recycling/Disposal
- Management of Fluorescent Lamps for Businesses
- Incompatible Chemicals
- Universal Wastes – Including Aerosol Cans
- TCLP – Toxicity Characteristic Leaching Procedure
- Part 279 Requirements: Used Oil Management Standards
- EPA Region 7 Emergency Response Program
- Chemical Facility Anti-Terrorism Standards

- Iowa Environmental Guide for Businesses

I reviewed the Verification Report (Attachment 1) with Messrs. Dorothy and Vice during the CEI. Based on this review, I changed the facility's hazardous waste generator status from large quantity generator (LQG) non-generator changed the email address of the site contact and corrected the telephone number. I made no other changes to the Verification Report.

I conducted a visual inspection of the facility, accompanied by Mr. Dorothy. After the visual inspection, I prepared and completed a site-specific inspection checklist to document my observations.

At the conclusion of the CEI, I conducted an exit briefing with Messrs. Dorothy and Vice. During the exit briefing, I provided a Receipt for Documents and Samples, which Mr. Dorothy signed, acknowledging receipt (Attachment 2). I provided Mr. Dorothy the Notice, which he signed indicating no confidential business information had been provided (Attachment 3). I initially made no preliminary findings during the inspection so a Notice of Preliminary Findings (NOPF) was not left with the facility at the conclusion of the CEI. However, I explained to Messrs. Dorothy and Vice that findings might be added by the EPA after review of the inspection report. After review, NOPF was added to the report on April 12, 2024 (Attachment 4) and Mr. Dorothy was notified by email on April 12, 2024.

A site map of the facility is included as Attachment 5. A Google Earth aerial photograph of the facility is included as Attachment 6. The seven photographs taken during the CEI are in Attachment 7, of which five are described in this report.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

ANR receives natural gas via two pipelines. The natural gas is passed through scrubbers to filter out impurities, compressed, and re-introduced into the same two pipelines. Spent scrubber filters are containerized upon generation in 55-gallon containers. The facility considers spent scrubber filters to be nonhazardous waste based on product and process knowledge, as well as analytical testing. According to Mr. Dorothy, spent scrubber filters are checked for toxicity characteristic leaching procedure (TCLP) metals and volatiles, pH, flash point, radiochemistry, reactive sulfide, and reactive cyanide when generated. According to Mr. Dorothy, transportation of natural gas through a pipeline generates pipeline condensate. He explained that pipeline condensate is considered nonhazardous, and consists primarily of hydrocarbons that may contain small amounts of water and oil. He also stated that the pipeline condensate is collected and transferred to a 2,200-gallon aboveground storage tank (AST). He added that approximately 400 to 500 gallons of pipeline condensate are generated annually and sold to Safety-Kleen Systems in Des Moines, Iowa.

Mr. Dorothy stated that at the beginning of 2020 through June of 2022, the facility went through a complete rebuilding of the facility including additional new buildings and equipment and the removal of old buildings and equipment. During the removal of one of the old buildings, it was

discovered to be contaminated with asbestos and PCBs. According to Mr. Dorothy, the removal of these wastes is the reason for the LQG designation on the Verification Report (Attachment 1). According to Mr. Dorothy, ANR has three compressors in the Compressor Building. The compressors are powered by engines which operate on natural gas. A glycol/water mixture (Ambitrol) is utilized to cool the engines. Ambitrol is piped from the engines to cooling fins in a continuously-circulating system.

Current operations at the facility generate used oil, scrubber filters, parts washer solvent, and waste absorbent materials.

Mr. Dorothy stated that during the rebuild of the facility, all of the lighting was converted over to light emitting diode (LED) lamps. No waste lamps have been generated since the rebuild and no waste lamps were in accumulation at the time of the CEI.

ANR employs six full-time personnel who work one shift (0700-1530 hours) on a Monday through Friday schedule. The ANR facility consists of six buildings on approximately 30 acres, with approximately 21,131 sq. ft. under roof. ANR began operations at this location in 1950, with a complete rebuild of the facility at the beginning of 2020 and finishing in June 2022. ANR's primary North American Industrial Classification System (NAICS) code is 486210 (Pipeline Transportation of Natural Gas).

ANR was previously inspected by an EPA contractor on April 17-18, 2012, with the following findings:

- Failure to label a used oil storage tank with the words "used oil"
- Failure to store universal waste lamps in a closed container.
- Failure to date or otherwise track universal waste to demonstrate the length of time of accumulation.
- Failure to mark a universal waste lamps storage container with the words "universal waste lamps" or "waste lamps" or "used lamps".
- Failure to mark a universal waste batteries container with the words "universal waste batteries" or "waste batteries" or "used batteries".
- Failure to adequately train employees on handling and management of universal waste.
- Storage of universal waste for longer than one year.

None of these findings were repeated in this CEI.

2. RCRA Status

The Verification Report (Attachment 1) indicates that ANR is registered with EPA, under EPA ID IAD980688220, as a LQG of hazardous waste (generating more than 1,000 kilograms [kg] of hazardous waste per calendar month). During the CEI, I determined that ANR is currently operating as a non-generator of hazardous waste.

3. Waste Streams

This section of the CEI report describes the waste streams generated by the facility, including the facility's waste determination, generation and management processes, and ultimate disposition. The following discussion of waste streams is based on conversations with facility representatives and the visual inspection. Mr. Dorothy accompanied me during the visual inspection.

Used oil is generated during maintenance of engines and compressors. The facility manages used oil according to provisions of Title 40 *Code of Federal Regulations* (40 CFR) Part 279. Used oil is transferred to 55-gallon used oil containers upon generation. Mr. Dorothy stated that approximately 500 gallons of used oil are shipped to Safety-Kleen Systems in Des Moines, IA, annually for recycling.

During the CEI, I observed four used oil containers in the Warehouse Building (Attachment 7, Photographs 4 and 5). All four of the 55-gallon used oil storage containers appeared to be in good condition with no apparent leaks or damage. All four of the containers were full and labeled with the words "used oil." I noted no deficiencies with management of used oil during the CEI.

Spent scrubber filters are generated during maintenance of the scrubbers. The facility considers spent scrubber filters to be nonhazardous waste based on product/process knowledge and testing. However, spent scrubber filters have not been generated since production resumed after the rebuild in 2022. I did not observe spent scrubber filters in accumulation during the CEI.

Parts washers solvent is generated by the quarterly servicing of the two parts washers. One parts washer uses hot water as a cleaning agent. The other parts washer uses Safety-Kleen Premium Solvent as a cleaning agent. The facility considers both parts washer solvent, when spent, to be nonhazardous waste based on product and process knowledge.

During the CEI, I observed a Safety-Kleen Aqueous parts washer in the Warehouse Building (Attachment 7 Photograph 6). The parts washer uses hot water as a cleaning agent. I also observed the parts washer in the Warehouse Building that uses Safety-Kleen Premium Solvent (Attachment 7, Photograph 7). The parts washer uses Safety-Kleen Premium Solvent (Attachment 8). Both parts washers are serviced approximately every three months by Safety-Kleen, and spent solvents are removed by Safety-Kleen during servicing.

Waste absorbent materials are generated during compressor and engine maintenance. The facility considers waste absorbent materials to be nonhazardous waste based on product and process knowledge. The waste absorbent materials are shipped to AbsorbTech in Milwaukee, Wisconsin for laundering and are returned to the facility for reuse. I did not observe any waste absorbent materials in accumulation during the CEI.

Unknown materials were generated during the rebuild and left at the facility by the contractors. During the CEI, I observed a 55-gallon container of unknown materials (Attachment 7, Photograph 2). Mr. Dorothy stated that ANR has been unable to have the contractors who performed the rebuild dispose of the container. The container was structurally sound, closed, labeled with the words "hazardous waste," labeled with hazardous waste codes D001 and D039,

and dated November 2022. ANR made the hazardous waste determination at the time of labeling based on product and process knowledge of the suspected contents. Mr. Dorothy stated that a sample was taken by a laboratory (ALS Global) in Traverse, Michigan, on February 1, 2024.

In a subsequent telephone call with Mr. Dorothy on April 11, 2024, he stated that the accumulation of the waste was spread out during the length of the rebuild (from the beginning of 2020 through June 2022). He provided a copy of the analytical report for the sample analysis (Attachment 9). Based on the analytical report, the applicable hazardous waste codes appear to be D001 and D035 due to presence of methyl ethyl ketone. According to Mr. Dorothy, the hazardous waste container was still at the facility while bids for removal of the waste were being obtained.

I ran a Manifest Inspectors Report for wastes shipped by ANR in calendar year 2022 (Attachment 10). Based on this report, ANR shipped 19,658 pounds of hazardous waste on November 16, 2022. It appears that ANR was operating as a LQG of hazardous waste (D007, D008, D018) at the time the waste determination was made on the 55-gallon container of unknown materials. Therefore, it appears that ANR accumulated hazardous waste longer than 90 days without a RCRA permit required by RCRA Section 3005 (**NOPF No. 1**).

A copy of the Notice of Preliminary Findings and notification was emailed to Mr. Dorothy on April 12, 2024.

General trash is generated during facility maintenance. The facility has determined that general trash is nonhazardous waste based on product and process knowledge. General trash includes, but is not limited to, floor sweepings, paper, and cardboard packaging. General trash is transported by Connelly Garbage Inc. in Fairfield, Iowa, and is landfilled at the Southeast Iowa Multi-County Solid Waste Agency in Richland, Iowa. During the CEI, I observed accumulation of general trash and noted no deficiencies.

4. Summary of Preliminary Findings

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

- Accumulation of hazardous waste beyond 90 days without a RCRA permit required by RCRA Section 3005 (**NOPF No. 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.

Clifford A.
Nelles

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Clifford A. Nelles, Inspector
CLAENE Group

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

Attachments:

1. Hazardous Waste Site Info Verification Report for Inspector (2 pages)
2. Receipt for Documents and Samples (1 page)
3. Confidentiality Notice (1 page)
4. Notice of Preliminary Findings (1 page)
5. Site Map (1 page)
6. Google Earth Photograph of Facility (1 page)
7. Photographic Documentation (Photolog and 7 Photographs) (5 pages)
8. Copy of SDS for Safety-Kleen Premium Solvent (8 pages)
9. Copy of Analytical Report from ALS dated February 12, 2024 (47 pages)
10. Manifest Inspectors Report for Wastes Shipped in 2022 (28 pages)