

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

CLOW VALVE COMPANY – METAL CASTING FACILITY

1607 17th Avenue East
Oskaloosa, Iowa 52577
641-569-6093

EPA ID Number: IAD005145941

On

November 19, 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 Clow Valve Company – Metal Casting (CVMC) Facility at 1607 17th Avenue East in Oskaloosa, 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

CVMC:

Dain Netland, Environmental Manager
Cindy Thompson, Assistant Environmental Manager
Andy Thompson, Environmental Specialist
Dean Markle, MCF Plant Manager (Entry and Exit Briefing only)
Chris Prendergast, Assistant General Manager (Entry and Exit Briefing only)
Mark Willett, Vice President/General Manager (Entry and Exit Briefing only)
Christopher Gehrig, Environmental Specialist (Entry and Exit Briefing only)

Toeroek Team:

Clifford Nelles, Inspector, 816-213-5192

INSPECTION PROCEDURES

Prior to the CEI at CVMC on November 19, 2024, I conducted a drive-by visual inspection. I did not observe any areas of concern during the drive-by. At approximately 08:00 a.m., I entered the main office and conference room and was met by Ms. Thompson. I explained that I was there to conduct a CEI and asked to speak with Mr. Netland, who was listed as the RCRA site contact on the Notification Acknowledgment/Verification Report (Verification Report) provided by EPA prior to the inspection (Attachment 1). Messrs. Netland, Thompson, Markle, Prendergast, Willett, Gehrig, and Ms. Thompson (CVMC team) were already in the conference room. I explained the purpose and scope of the CEI to the CVMC team and proceeded to conduct an entry briefing with them.

During the entry briefing, I presented my business card and EPA credentials to the CVMC team. 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. Prendergast 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 the CVMC team 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. Netland 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 sent electronically to Mr. Netland.

- 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 the CVMC team during the CEI. Based on this review, I made no changes to the Verification Report.

I conducted a visual inspection of the facility, accompanied by Mr. Thompson and Ms. Thompson. Following the visual inspection, I reviewed facility records including hazardous waste manifests with land disposal restriction (LDR) notifications, hazardous waste biennial report, Contingency Plan, inspection records, and training documentation. 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 the CVMC team. During the exit briefing, I provided a Receipt for Documents and Samples, which Mr. Prendergast signed, acknowledging receipt (Attachment 2). I provided Mr. Prendergast the Notice, which he signed indicating no confidential business information had been provided (Attachment 3). I did not initially leave a Notice of Preliminary Findings (NOPF) at the time of the CEI, but added a NOPF on December 5, 2024, after further review of the documentation received during the CEI. The NOPF was sent via Federal Express to Mr. Prendergast, who signed the form to acknowledge receipt (Attachment 4).

A site map obtained during the CEI is included as Attachment 5 and a Google Earth aerial photograph of the facility is included as Attachment 6. The 15 photographs taken during the CEI are in Attachment 7, all of which are described in this report.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

CVMC began operating in 1967 and employs 115 people who primarily work one shift (5:00 a.m. to 3:30 p.m.) Monday through Friday. The facility is in an industrial area on the southeast side of Oskaloosa, Iowa, and has a footprint of approximately 200,000 square feet under roof.

CVMC is a manufacturer of iron and brass castings for the Clow Valve Company – Machine Shop in Oskaloosa, Iowa. The major raw materials used are scrap iron and brass. Iron and brass casting generates iron induction furnace dust (IIFD), baghouse filters, and brass slag. CVMC considers IIFD and baghouse filters to be hazardous waste based on product/process knowledge and/or analytical testing. The facility considers brass slag to be nonhazardous waste based on product and process knowledge.

Other wastes generated during manufacturing operations include spent coolant from quality control testing, spent aerosol cans from product marking activities, and aerosol can residue. CVMC considers spent coolant to be hazardous waste based on product/process knowledge and analytical testing. The facility manages waste aerosol cans as universal waste according to provisions of Title 40 *Code of Federal Regulations* (40 CFR) Part 273 during accumulation. Accumulated aerosol cans are punctured and drained into a 55-gallon satellite accumulation container (SAC) in the machine shop. Aerosol can residue drained from the cans is considered to

be hazardous waste based on product and process knowledge. Punctured and drained aerosol cans are consolidated with scrap metal for recycling.

Equipment and facility maintenance generate parts washer fluid, used oil, used oil filters, spent lamps, spent batteries, excluded solvent-contaminated wipes, and general trash. The facility considers parts washer fluid to be nonhazardous waste based on product and process knowledge. CVMC manages used oil and used oil filters as used oil according to provisions of 40 CR Part 279. The facility manages spent lamps and spent batteries as universal waste according to provisions of 40 CFR Part 273. Excluded solvent-contaminated wipes are managed under provisions of 40 CFR 261.4(b)(18) and collected for landfill disposal. General trash consists of office and packaging wastes and is considered by the facility to be nonhazardous waste.

CVMC was last inspected by an EPA contractor on June 30, 2021, with one preliminary finding for failure to determine whether a waste is a characteristic hazardous waste. The preliminary finding was not repeated during this inspection.

2. RCRA Status

The Verification Report (Attachment 1) indicates that CVMC is registered with EPA, under EPA ID IAD005145941, as a LQG of hazardous waste (generating more than 1,000 kilograms [kg] or 2,200 pounds of hazardous waste per calendar month). During the CEI, I reviewed the facility's 2023 Hazardous Waste Biennial Report and observed waste in accumulation to determine the current hazardous waste generator status.

CVMC manages hazardous waste according to LQG requirements. The facility's 2023 Hazardous Waste Biennial Report, submitted on February 16, 2024, reported a total of 18,833 pounds of hazardous waste generated in 2023 (Attachment 8). The majority of the hazardous waste reported was IIFD. During the CEI, Ms. Thompson explained that each hazardous waste accumulation container (HWAC) of IIFD is sampled and analyzed for toxicity characteristic leaching procedure (TCLP) constituents. Each HWAC of IIFD is determined to be hazardous or nonhazardous waste based on results of container-specific analyses.

At the time of the inspection, CVMC had approximately 3,846 pounds (1,748 kg) of hazardous waste in accumulation in the hazardous waste central accumulation area (HWCAA). Based on accumulation start dates marked on the HWACs, 2,304 pounds of hazardous waste was generated in the month of September 2024. Because the facility generated more than 2,200 pounds (1,000 kg) of hazardous waste in September 2024 and did not submit notification of intent to utilize the alternative standards for episodic generation, I determined the facility was operating as a LQG of hazardous waste and inspected the facility as such. I also inspected CVMC 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.

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.

IIFD is generated during the melting and casting of scrap iron in the induction furnace. The IIFD is hard piped to a separate building (Building 118) where it is accumulated in 30-cubic-foot Supersack HWAC in the Building 118 HWCAA. Each HWAC is managed as hazardous waste until results of the HWAC-specific TCLP analyses are received. If samples from a HWAC show all constituents below TCLP thresholds for characteristic hazardous waste, the HWAC is determined to be nonhazardous waste. Nonhazardous waste IIFD is collected by Midwest Sanitation and transported to the Mahaska County Landfill for disposal. If samples exhibit one or more constituents above TCLP thresholds, the HWAC is determined to be hazardous waste. Hazardous waste IIFD is transported to Tradebe Treatment and Recycling in East Chicago, Indiana, for bulking and off-site transfer. Hazardous waste IIFD is typically determined to be D006 and/or D008 characteristic hazardous waste based on cadmium and/or lead detections above regulatory limits. Based on the 2023 Hazardous Waste Biennial Report and observations during the CEI, I estimated the facility generates between 959 and 3,456 pounds (436 and 1,571 kg) of hazardous waste IIFD per month. The hazardous waste IIFD generation rate varies depending on analytical results received for each HWAC.

During the CEI, I observed two 30-cubic-foot Supersack HWACs of hazardous waste IIFD in the Building 118 HWCAA (Attachment 7, Photographs 2 and 3). The HWACs were structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and full. The HWACs were dated September 25, 2024, and weighed approximately 1,152 pounds (524 kg) each.

I observed a supersack HWAC of IIFD being filled in Building 118 (Attachment 7, Photograph 6). The HWAC was structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and dated October 31, 2024. Ms. Thompson explained that samples will be collected from the HWAC when it fills to make the final waste determination and to determine the appropriate destination facility.

I also observed 13 additional Supersack HWACs in the HWCAA (Attachment 7, Photographs 4 and 5). Ms. Thompson explained that construction was occurring near the induction furnace and a wall was demolished. She stated that the 13 HWACs contained plastic and debris contaminated with dust, which tested above TCLP limits for cadmium and lead (D006, D008 characteristic hazardous waste). The 13 Supersack HWACs were structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, dated October 7, 2024, and weighed approximately 30 pounds each. I observed no deficiencies regarding management of IIFD during the CEI.

Spent coolant is generated in the pattern shop during quality control testing. Based on the 2023 Hazardous Waste Biennial Report, CVMC generates approximately 40 pounds (18 kg) of spent coolant per month (Attachment 8, page 5). The facility considers spent coolant to be hazardous waste (D008) based on product/process knowledge and analytical testing. A copy of the waste profile for spent coolant is included as Attachment 9. Spent coolant is transported to Tradebe Treatment and Recycling in East Chicago, Indiana, for bulking and off-site transfer.

During the CEI, I observed a 55-gallon SAC of spent coolant in the pattern shop (Attachment 7, Photograph 7). The SAC was near the point of generation, under control of the operator, structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and held approximately 15 gallons of spent coolant. I observed no deficiencies regarding management of spent coolant during the CEI.

Baghouse filters are generated by maintenance personnel replacing spent filters in the dust collection system. Based on the 2023 Hazardous Waste Biennial Report, CVMC generates approximately 418 pounds (190 kg) of baghouse filters per month (Attachment 8, page 4). The facility considers baghouse filters to be hazardous waste (D006, D008) based on product and process knowledge. Baghouse filters are transported to Tradebe Treatment and Recycling in East Chicago, Indiana, for bulking and off-site transfer. I did not observe baghouse filters in accumulation during the CEI.

Brass slag is generated during brass casting operations. CVMC has determined that brass slag is nonhazardous waste based on product and process knowledge. The facility generates approximately 21,500 pounds (9,773 kg) of brass slag per month. Brass slag is containerized and transported to IMET Corporation in Elgin, Illinois, for recycling. I did not observe brass slag in accumulation during the CEI.

Parts washer fluid is generated during the servicing of the parts washer used for general cleaning of small parts. The parts washer uses Safety-Kleen Premium Solvent. A copy of the SDS for Safety-Kleen Premium Solvent is included as Attachment 10. The facility considers parts washer fluid to be nonhazardous waste based on product and process knowledge. CVMC generates approximately 30 gallons per quarterly servicing event. Parts washer fluid is containerized upon generation and immediately transported to Safety-Kleen Systems in Des Moines, Iowa, for recycling. I observed the parts washer in the machine shop during the CEI (Attachment 7, Photograph 13) and noted no deficiencies or concerns.

Spent aerosol cans consist of used aerosol paint cans used for painting ID numbers on pallets of cast iron and brass. The facility manages aerosol cans as universal waste according to provisions of 40 CFR Part 273. CVMC generates approximately 55 gallons of spent aerosol cans per year. Spent aerosol cans are accumulated in a universal waste accumulation container in the machine shop. When the universal waste accumulation container is full or the accumulation start date approaches the one-year accumulation limit, the container is taken to an aerosol can puncturing unit where the cans are punctured and drained. Aerosol can residue drained from the cans is accumulated in a 55-gallon SAC. Punctured and drained aerosol cans are consolidated with the facility’s scrap metal for recycling.

During the CEI, I observed a 55-gallon container of spent aerosol cans in the machine shop (Attachment 7, Photograph 11). The container was structurally sound, closed, labeled with the words “universal waste aerosol cans,” dated November 18, 2024, and held approximately 1 gallon of spent aerosol cans. I observed no deficiencies regarding management of spent aerosol cans during the CEI.

Aerosol can residue is generated from the puncturing and draining of aerosol cans in the machine shop. CVMC generates approximately 10 pounds (2 kg) of aerosol can residue per month. The facility considers aerosol can residue to be hazardous waste (D001) based on product and process knowledge. The waste is accumulated in a 55-gallon SAC beneath the aerosol can puncturing device. Aerosol can residue is transported to Tradebe Treatment and Recycling in East Chicago, Indiana, for bulking and off-site transfer.

During the CEI, I observed the 55-gallon SAC of aerosol can residue in the machine shop (Attachment 7, Photograph 12). The SAC was structurally sound, closed, at the point of generation, under control of the operator, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and held approximately 10 gallons of aerosol can residue. I observed no deficiencies regarding management of aerosol can residue during the CEI.

Used oil is generated during maintenance of equipment. CVMC generates approximately 50 gallons of used oil per month. The facility manages used oil according to provisions of 40 CFR Part 279. Used oil is accumulated in 55-gallon used oil storage containers and is collected by Crystal Clean in Des Moines, Iowa, for recycling.

During the CEI, I observed a 55-gallon used oil storage container in the machine shop (Attachment 7, Photograph 14). The used oil storage container appeared to be in good shape without any apparent leaks or damage, was labeled with the words “used oil,” and held approximately 20 gallons of used oil. I observed no deficiencies regarding management of used oil during the CEI.

Used oil filters are generated by maintenance servicing equipment. The facility generates approximately 55 gallons of used oil filters per year. Used oil filters are drained for 24 hours into a used oil storage container prior to accumulation in a separate 55-gallon container. The facility manages used oil filters before and after draining as used oil according to provisions of 40 CFR Part 279. Drained used oil filters are collected by Crystal Clean in Des Moines, Iowa, for recycling.

During the CEI, I observed a used oil filter draining container atop a 55-gallon used oil storage container in the machine shop (Attachment 7, Photograph 15). I also observed 55-gallon container for accumulation of drained used oil filters. Both used oil filter containers appeared to be in good shape and were labeled with the words “used oil.” I observed no deficiencies regarding management of used oil filters during the CEI.

Spent lamps are generated by maintenance personnel replacing spent lamps. CVMC generates approximately 100 spent lamps per year. The facility manages all waste lamps as universal waste according to provisions of 40 CFR Part 273. Waste lamps are accumulated in fiberboard containers in the maintenance shop and are collected by A-TEC Recycling in Des Moines, Iowa, for recycling.

During the CEI, I observed two spent lamps accumulation containers in the maintenance shop (Attachment 7, Photographs 8 and 9). The containers were structurally sound, closed, labeled with the words “universal waste lamps,” dated May 6, 2024, and held approximately 5 to 10

spent lamps each. I observed no deficiencies regarding management of spent lamps during the CEI.

Spent batteries (UWB) are generated by maintenance replacing spent batteries in radios and equipment. The facility generates approximately 30 gallons of spent batteries per year. CVMC manages all spent batteries as universal waste according to provisions of 40 CFR Part 273. Spent batteries are accumulated in a 55-gallon container in the machine shop and are collected by A-TEC Recycling in Des Moines, Iowa, for recycling.

During the CEI, I observed the 55-gallon container of spent batteries in the machine shop (Attachment 7, Photograph 10). The container was structurally sound, labeled with the words “used batteries,” dated May 6, 2024, and held approximately 15 gallons of spent batteries. I observed no deficiencies regarding management of spent batteries during the CEI.

Excluded solvent-contaminated wipes consist of solvent-contaminated wipes generated from equipment cleaning within in the facility. I did not determine the generation rate for excluded solvent-contaminated wipes during the CEI. CVMC has determined excluded solvent-contaminated wipes to be exempt from the definition of hazardous waste under provisions of 40 CFR 261.4(b)(18). I reviewed the written plan for the handling of excluded solvent-contaminated wipes and found that it met the criteria for 40 CFR 261.4(b)(18)(v). Excluded solvent-contaminated wipes are accumulated in 10-gallon containers and are collected by Midwest Sanitation in Oskaloosa, Iowa, for disposal at the Mahaska County Landfill.

During the CEI I observed an excluded solvent-contaminated wipes container in the pattern shop (Attachment 7, Photograph 1). The container was structurally sound, closed, labeled with the words “excluded solvent-contaminated wipes, dated September 4, 2024, and was empty.

General trash is generated during facility maintenance and includes, but is not limited to, floor sweepings, paper, and cardboard packaging. The facility has determined that general trash is nonhazardous waste based on product and process knowledge. General trash is accumulated in several containers throughout the facility and is collected by Midwest Sanitation in Oskaloosa, Iowa, for disposal at the Mahaska County Landfill. During the CEI, I observed accumulation of general trash and noted no deficiencies.

4. Required Response Equipment and Hazard Management

Per 40 CFR 262.15(a)(8) and 262.17(a)(6), a LQG must operate to minimize the possibility of a fire, explosion, or spill, and must maintain emergency response equipment. During the visual inspection, I observed spill response equipment consisting of mats, absorbent materials, shovels, and brooms, as well as the presence and availability of fire extinguishers. I determined that the spill and fire response equipment was adequate for the hazardous wastes generated and accumulated at the facility.

5. Container Accumulation Area

CVMC maintains one HWCAA in Building 118. I asked Ms. Thompson if the facility inspected the HWCAA. She stated that the HWCAA is inspected weekly and that an inspection log is

maintained. I reviewed the inspection log for the last three years and noted that no weekly inspections were missed. A copy of the inspection log for the last inspection, conducted on November 13, 2024, is included as Attachment 11.

I asked Mr. Thompson how someone would summon emergency assistance. He stated that all of the people who manage hazardous carry two-way radios and that a telephone is available in the HWCAA. I noted no deficiencies regarding management of hazardous wastes in the HWCAA.

6. Manifests and Biennial Report

CVMC generated 13 uniform hazardous waste manifests from November 19, 2021, through November 19, 2024. I reviewed all 13 manifests and noted no discrepancies. A copy of the manifest and LDR from the last shipment of hazardous waste, dated September 4, 2024, is included as Attachment 12. The facility submitted a 2023 Hazardous Waste Biennial Report on February 16, 2024 (Attachment 8). I noted no deficiencies regarding manifests and biennial reporting during the CEI.

7. Preparedness and Prevention

LQG facilities are required by 40 CFR 262.17(a) to meet the emergency preparedness, prevention, and procedures requirements including documented arrangements with response agencies. According to Ms. Thompson, CVMC is the subject of a regular inspection by the Oskaloosa Fire Department hazardous materials team. During those inspections, she said the fire department is shown the layout of the facility, the location of the hazardous waste HWCAA, and other facility features.

During the CEI, I reviewed the facility's 11-page Contingency Plan and Quick Response Guide. I noted that CVMC last updated their contingency plan and Quick Response Guide on March 2, 2023. A copy of the contingency plan and Quick Response Guide is included as Attachment 13.

I reviewed the Contingency Plan against the content requirements of 40 CFR 262.261. The Contingency Plan included a general description of actions needed to respond to fires, explosions, and spills as well as a description of arrangements with the local emergency agencies. It contained a list of emergency response equipment maintained at the plant (including capabilities and location) and an evacuation plan with a description of the signals used, as outlined in 40 CFR 262.17(a)(6) referencing 262.261(a, c, e, and f). The Contingency Plan also included names and telephone numbers of the primary and alternate emergency coordinators, as required by 40 CFR 262.17(a)(6) referencing 262.261(d).

The Contingency Plan also included a Quick Reference Guide. I reviewed the facility's Quick Reference Guide against the content requirements of 40 CFR 262.262(b). The Quick Reference Guide included a list with descriptions and maximum quantities of hazardous wastes onsite; identification of special hazards; layout sketch showing hazardous wastes locations, overall facility location, and EC contact information. According to facility representatives, the updated Contingency Plan and Quick Reference Guide were submitted to emergency response agencies. I noted no deficiencies regarding preparedness and prevention and the RCRA Contingency Plan during the CEI.

8. Personnel Training Requirements

Personnel training is required by LQG regulations specified in 40 CFR 262.17(a)(7)(i)(A) to ensure that employees are thoroughly familiar with proper waste handling procedures relevant to their responsibilities. CVMC provides annual training to personnel who handle and manage hazardous waste. Copies of the training records for Christopher Gehrig, Dain Netland, Cynthia Thompson, and Andy Thompson, as well as new employee training checklists, are included in Attachment 14.

I asked Mr. Netland for a copy of the job description for Ms. Thompson. He stated that Ms. Thompson's job description was on page 3 of the Contingency Plan and was the same as the Environmental Manager. I reviewed the job description and determined the facility failed to have adequate job descriptions for personnel who manage hazardous waste, as required by 40 CFR 262.17(a)(7)(iv) (**NOPF No. 1**). NOPF No. 1 includes the following deficiencies:

- Failure to track specific job titles and names of persons filling positions, as required by 40 CFR 262.17(a)(7)(iv)(A)
- Failure to describe, in writing, skills, education or qualification, and duties associated with each job title, as required by 40 CFR 262.17(a)(7)(iv)(B).
- Failure to prepare a written description of type and amount of introductory and continuing training, as required by 40 CFR 262.17(a)(7)(iv)(C).

NOPF No. 1 was not left with the facility but was added on December 5, 2024. Mr. Netland and Ms. Thompson were notified of its addition by email on December 5, 2024.

9. 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 vents. A process vent used in distillation, fractionation, solvent extraction, thin-film evaporation, air stripping, or steam stripping is regulated by Subpart AA. CVMC 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. CVMC 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 HWACs. During the CEI, I determined that CVMC meets the Subpart CC requirements for containers by using Container Level 1 controls (HWACs 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.

10. Summary of Preliminary Findings

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

- (1) Failure to have adequate job descriptions for personnel who manage hazardous waste, as required by 40 CFR 262.17(a)(7)(iv) (**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

AMBER WHISNANT

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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 Aerial Photograph (1 page)
7. Photographic Documentation (Photolog and 15 Photographs) (10 pages)
8. Copy of 2023 Biennial Report (6 pages)
9. Copy of Waste Profile for Spent Coolant (1 page)
10. Copy of SDS for Safety-Kleen Premium Solvent (9 pages)
11. Copy of Inspection Log Dated November 13, 2024 (8 pages)
12. Copy of Manifest and LDR for Shipment on September 4, 2024 (2 pages)
13. Copy Contingency Plan and Quick Reference Guide (11 pages)
14. Copies of Training Records and New Employee Training Checklists (5 pages)