REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

Harcros Chemicals Inc.
2040 W River Dr.
Davenport, IA 52808
(720) 989-9069

EPA ID Number: IAD022100671

On

March 25, 2021

By

Eastern Research Group, Inc.

For

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

1.0 INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division/Chemical Branch/RCRA Section (ECAD/CB/RCRA) of the U.S. Environmental Protection Agency (EPA) Region 7, Eastern Research Group, Inc. (ERG) conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Harcros Chemicals Inc. (Harcros) in Davenport, Iowa on March 25, 2021. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. Throughout the CEI, data and information were collected to determine compliance with the applicable regulatory and statutory requirements. The inspection report and attachments present the results of the CEI.

2.0 PARTICIPANTS

Harcros Chemicals Inc.:
Eric Roesch, Compliance Manager
Craig Bevard, Operations Manager
Mike Kane, District Manager

EPA Representative, ERG:
Janosh Wolters, Energy Engineer (Lead Inspector)
George Wieber, Chemical Engineer

3.0 INSPECTION PRECEDURES

Due to the COVID-19 pandemic, I contacted the facility via telephone and spoke with Mr. Roesch approximately one week prior to the inspection. We discussed facility specific safety protocols to ensure the safety of all personnel involved during the inspection and I informed him when I would arrive at the facility with one additional inspector to conduct the inspection. Additionally, Mr. Roesch informed me he is the compliance manager for multiple Harcros sites and would not be attending the inspection. Mr. Roesch stated Mr. Bevard would be present for the duration of the inspection. After arriving announced at Harcros at approximately 07:45, I performed a drive-by visual inspection of the facility and took a photograph before beginning the inspection and did not note any areas of concern. The facility was secured with a safety gate. Mr. Roesch provided Mr. Bevard's contact information and I called Mr. Bevard explaining I was outside of the facility's front gate. Mr. Bevard opened the gate and I parked outside the facility's office area. Mr. Wieber and I first met with Mr. Kane who asked us to sign the visitor's log before entering the facility. Mr. Kane then guided us to a conference room in the office area to begin the opening conference. Mr. Bevard was present in the conference room and I introduced myself. Mr. Kane and Mr. Bevard accompanied Mr. Wieber and me for the duration of the inspection.

I initiated the opening conference with Mr. Kane and Mr. Bevard representing Harcros and presented them with my inspector credentials and business card, as well as the business card of the EPA Task Order Contracting Officer Representative, Mr. Trevor Urban. I then presented a copy of RCRA Section 3007(a), which contains EPA's inspection authority. I explained my need to collect accurate information and presented them with a copy of Title 18 U.S. Code, Sections 1001 and 1002. I then presented the Harcros representatives with a copy of the *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections* and reviewed Harcro's confidentiality rights. I informed them I would provide a *Confidentiality Notice* at the end of this inspection.

The inspection consisted of a discussion of facility operations, waste generation and waste management, a review of waste management records, and a visual inspection of the waste generation and management areas. Harcros provided a facility layout (see Attachment 1) and Mr. Bevard and Mr. Kane explained facility operations conducted on site. I conducted an in-depth visual inspection of the entire facility.

During the visual inspection of the facility, Mr. Bevard guided Mr. Wieber and me throughout the facility in order to conduct thorough evaluations of the facility's processes and areas where waste is generated. At the time of the inspection, the facility was not generating any hazardous waste. Mr. Bevard explained the facility is no longer conducting any manufacturing operations. Mr. Bevard and Mr. Kane explained that the facility's only operation is to receive, store, and ship Harcros products to customers. The facility receives products from other Harcros locations and redistributes these products to customers. Mr. Bevard stated the facility generates general trash, universal waste, and used oil.

Three photographs were collected as inspection documentation and are shown in Attachments 2 and 3. Information collected during the inspection is documented on the *EPA Inspection Checklist* (see Attachment 4). I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.01D), unless noted differently. At the conclusion of the inspection, I provided Mr. Kane with a *Confidentiality Notice* and *Receipt for Documents and Samples* which he signed as acknowledgement of receipt (see Attachments 5 and 6, respectively). No confidentiality claims were made by Harcros. No findings were observed at the time of the inspection. Therefore, a *Notice of Preliminary Findings* was not left with Harcros.

The following inspection documents and compliance assistance handouts were left with Harcros:

RCRA Section 3007(a)
Title 18 U.S. Code, Sections 1001 and 1002
Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections
Confidentiality Notice (Top page of the completed carbonless transfer set)
Receipt of Documents and Samples (Top page of the completed carbonless transfer set)
NOPF (Top page of the completed carbonless transfer set)
Instructions for Responding to a NOPF
Security Awareness
Commercial Motor Vehicle Transportation
Security Planning
EPA E-Manifest Fact Sheet U.S.
EPA Small Business Resources
U.S. EPA Publication, Managing Your Hazardous Waste
U.S. EPA Publication, Managing Used Oil-Advice for Small Businesses
PowerPoint Presentation, 2013 Solvent Wipes Final Rule
Pollution Engineering Article, 10 Common Questions for Waste Generators
Iowa Department of Natural Resources (IDNR) Waste Exchange Folder and P2 Brochures
IDNR Management of Fluorescent Lamps for Businesses Information Sheets
IDNR Aerosol Can Disposal for Businesses Information Sheet
University of Northern Iowa Waste Reduction Center Information Card

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

Harcros began operating in 1952 and currently employs approximately eight people. The facility operates one shift, Monday through Friday, 07:00 to 16:30. The facility has a footprint of approximately 2.5 acres. The facility's total covered building space is 24,100 square feet and 18,000 square feet is used for warehouse storage. Harcros only receives and redistributes final products from other Harcros locations and delivers them to customers. The facility distributes a variety of chemicals and food grade materials. Products such as trisodium citrate dihydrate, is used in assisting the food plant industry and are a large portion of the facility's distributed product material. Additionally, Mr. Kane stated that acetone is the most shipped chemical after trisodium citrate dihydrate to customers. The facility does not repackage or open any products

being transferred to customers. The facility is used as warehouse storage before final delivery to customers (see Attachment 3, Photo 2). The following waste streams are produced: universal waste, used oil, and general trash.

4.2 RCRA Status

According to the *Hazardous Waste Site Info Verification Report for Inspector* (see Attachment 7), Harcros notified as a federal Large Quantity Generator (LQG) of D007, D039, D040, and D043 hazardous waste in 2020. I asked Mr. Kane and Mr. Bevard to review the *Hazardous Waste Site Info Verification Report for Inspector*, which I provided during the inspection. Mr. Kane and Mr. Bevard were both unaware the facility notified to be a large quantity of hazardous waste. I asked if the facility had any spills of product that were then handled as hazardous waste. Mr. Bevard stated he was not aware of any spills that occurred in 2020, which was when the facility notified to be a large quantity of hazardous waste. Harcros sent Ms. Elizabeth Koesterer a letter on August 1, 2016 in response to an EPA letter requesting information on submittal of a Biennial Report. The EPA letter also asked Harcros to explain the facility's generator status by updating their Hazardous Waste Site Info Verification Report. Mr. Kevin Roepe, a Harcros Compliance Manager at the time the letter responded to the EPA letter (see Attachment 8). The letter stated the facility had completed form 8700-12 for the site to become a temporary LQG in preparation for a groundwater monitoring and sampling event. Additionally, the letter stated the event produced a total of 2,080 pounds of hazardous waste. After the disposal of the generated wastes, a form 8700-12 was submitted for the site to go back to a conditionally exempt small quantity generator. The facility submitted another 8700-12 form confirming the facility's very small quantity generator on October 17, 2019 as shown in Attachment 9. After reviewing the records and walking through the facility, I determined that the facility is operating as a non-generator of hazardous waste, a generator of used oil, and a SQH (small quantity handler) of universal waste. Harcros does not currently generate hazardous waste based on a review of facility records, a visual inspection of process and waste management areas, and interviewing personnel.

Harcros was previously inspected by EPA on January 31, 2012. The inspection did not lead to any issues or findings. EPA determined Harcros to be a non-generator of hazardous waste.

4.3 Facility Waste Streams and Management

A Waste Stream and Waste Handling Table for Harcros is presented below. The table describes waste streams generated, generation process/rates, hazardous waste determinations, and on-site/off-site management.

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#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
1	Universal Waste (Used Batteries)	Facility operations	Nonhazardous (managed as universal waste)	Less than five batteries per year	Accumulated in a closed and labeled 5-gallon container	Cleanlites Recycling Inc. in Lakeville, IA
2	Universal Waste (Lamps)	Facility maintenance	Nonhazardous (managed as universal waste)	Less than 20 lamps per year	Accumulated in a closed and labeled four-foot cardboard container	Cleanlites Recycling Inc. in Lakeville, IA
3	Used Oil	Forklift maintenance twice a year	Nonhazardous (managed as used oil under 40 CFR 279)	Less than five gallons per year	Forklifts are serviced by MH Equipment who removes the used oil immediately after servicing forklifts (Invoice included as Attachment 10)	MH Equipment in Ottawa, Illinois (ILR000117648)
6	General Trash	Facility operations	Nonhazardous (based on process knowledge and knowledge of the product)	One 8-yard dumpster picked up once per week	8-yard dumpster	Millennial Waste Incorporated in Rock Island County, Illinois

4.2 Universal Waste

Harcros manages a minimal amount of universal waste. At the time of the inspection, I observed one four-foot cardboard container accumulating spent lamps. The container was closed, labeled "Universal Waste Lamps", and had an accumulation start date of February 1, 2021. Mr. Bevard stated the facility replaces waste lamps with LED (light-emitting diode) light fixtures. Additionally, I observed one 5-gallon container of universal waste batteries. The container was closed, labeled "Universal Waste Batteries", and had an accumulation start date of "08/07/2017" (see Attachment 3, Photo 3). In Photo 3, the box stating "Batteries" was not checked but on the other side of the container, I observed the words "Universal Waste Batteries". I asked Mr. Bevard why the facility was accumulating batteries for longer than one year. Mr. Bevard stated the facility did not generate enough batteries to be shipped off-site. I explained to Mr. Bevard that facilities are required to ship universal waste once accumulated over one year. I reviewed the regulations set forth in 40 CFR § 273.15(b). The regulation states small quantity handlers of universal waste are able to accumulate universal waste for longer than one year for unique circumstances. The universal waste may be accumulated for longer than one year if its sole purpose is because of the quantities of the universal waste is to properly recover, treat, or dispose of this waste. Mr. Bevard explained the facility has only accumulated a total of five, mixed between 9V and AA. I provided compliance assistance stating multiple facilities near Harcos would take or pick up these universal waste batteries. Mr. Bevard stated he has no issue with sending the universal waste batteries off-site at least once per year. I did not leave a finding for the five batteries observed at the time of the inspection. However, further EPA review may add a finding for accumulating universal waste for longer than one year.

4.3 Used Oil

Harcros generates approximately five gallons of used oil per year. The used oil is a result of forklift maintenance. Mr. Bevard stated MH Equipment services the facility's forklifts. MH Equipment services forklifts on site twice per year and removes all used oil generated from forklift maintenance. MH Equipment has obtained an EPA ID number (ILR000117648). An invoice was taken as an example of the services completed on site and is provided in Attachment 10. I did not note any issues or findings regarding used oil.

I observed no issues or findings during this inspection. However, further EPA review may add findings.

JANOSH WOLTERS (Affiliate)

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Janosh Wolters
Energy Engineer
Date: May 12, 2021

AMBER WHISNANT

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Amber Whisnant
Section Chief
ECAD/CB/RCRA, EPA Region 7
Date: May 12, 2021

Attachments

1) Attachment 1 - Facility Layout (1 page)
2) Attachment 2 - Harcros Chemicals Inc. Photolog (1 page)
3) Attachment 3 - Harcros Chemicals Inc. Photos (3 photos, 4 pages)
4) Attachment 4 - EPA Inspection Checklist (13 pages)
5) Attachment 5 - Confidentiality Notice (1 page)
6) Attachment 6 - Receipt for Documents and Samples (1 page)
7) Attachment 7 - Hazardous Waste Site Info Verification for Inspector (1 page)
8) Attachment 8 - EPA Letter Correspondence (6 pages)
9) Attachment 9 - RCRA Subtitle C Site Identification Form from October 2019 (10 pages)
10) Attachment 10 - Used Oil Invoice (1 page)