

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

Gomaco Corporation Plant 1

121 E HWY 175
Ida Grove, IA 51445
(712) 364-3347

EPA ID Number: IAD984568519

On

July 27, 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 Gomaco Corporation Plant 1 (Gomaco) in Ida Grove, Iowa on July 27, 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

Gomaco Corporation Plant 1:

Ray Netherton, Manufacturing Engineer Manager

Sean Benner, Manufacturing Engineer

Greg Ebersole, Safety Director

EPA Representative, ERG:

Janosh Wolters, Energy Engineer

3.0 INSPECTION PRECEDURES

Due to the COVID-19 pandemic, I contacted the facility via telephone and spoke with Mr. Netherton 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 to perform the inspection. After arriving announced at Gomaco at approximately 09:15, 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.

I met with Mr. Netherton, Mr. Benner, and Mr. Ebersole. Mr. Ebersole stated he would not participate in the opening conference, but would be available throughout the inspection as needed. Mr. Netherton escorted us to an office to begin the opening conference. I initiated the opening conference with Mr. Netherton and Mr. Benner. I 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 Mr. Netherton with a copy of Title 18 U.S. Code, Sections 1001 and 1002. I then presented Mr. Netherton with a copy of the *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections* and reviewed Gomaco's confidentiality rights. I informed him 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. Mr. Netherton provided me with a facility layout (see Attachment 1) and explained facility operations and management areas.

During the visual inspection of the facility, Mr. Netherton and Mr. Benner guided 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. Netherton explained the facility previously operated a paint line. The painting operation was removed and moved to another facility in 2014. The painting operation was the only operation that generated hazardous waste. Therefore, the facility has not generated hazardous waste since the removal of the paint line. I asked Mr. Netherton if the facility generated universal waste and/or used oil. Mr. Netherton stated the facility accumulates universal waste lamps and used oil. I asked Mr. Netherton if the facility generated universal waste batteries. Mr. Benner explained the facility maintenance team is located primarily at Gomaco's Plant 2 which is located approximately a quarter mile away. The maintenance team travels in company vehicles to Plant 1 as needed and any universal waste batteries are accumulated at Plant 2. Mr. Benner explained the facility accumulated universal waste lamps at Plant 1 because the waste is generated on site. Mr. Netherton explained the facility's management practice and guided me to the facility's designated universal waste accumulation area and used oil storage area. I conducted an in-depth visual inspection of the entire facility and did not observe any hazardous waste being generated. In addition, I reviewed the facility's universal waste practices and did not note any issues.

Two 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. Ebersole with a *Confidentiality Notice*, *Receipt for Documents and Samples*, and *Notice of Preliminary Findings* which he signed as acknowledgement of receipt (see Attachments 5, 6, and 7, respectively). Mr. Netherton, Mr. Benner, and Mr. Ebersole were present during the closing conference. No confidentiality claims were made by Gomaco.

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

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

Solvent-Contaminated Wipes Final Rule Summary Chart

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

Gomaco began operating in 1960 and currently employs approximately 100 people. The facility operates one shift. Gomaco works Monday through Friday, 06:00 to 16:30. The facility has a footprint of approximately 92,000 square feet. Gomaco operations include cutting, grinding, and polishing in manufacturing pieces of concrete paving equipment. The major raw materials used are iron, stainless steel, and aluminum. The major manufacturing or processing operations that generate waste streams include cleaning and cutting steel. The following waste streams are produced: scrap metal, aerosol cans, hazardous waste rags, used oil, universal wastes, and general trash.

4.2 RCRA Status

According to the *Hazardous Waste Site Info Verification Report for Inspector* (see Attachment 8), Gomaco notified as a federal Very Small Quantity Generator of D001, D035, F003, and F005 hazardous waste. I asked Mr. Benner and Mr. Netherton to review the *Hazardous Waste Site Info Verification Report for Inspector*, which I provided during the inspection. Both indicated the site contact needed to be updated. 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. Gomaco does not currently generate hazardous waste based on my review of facility records, a visual inspection of process and waste management areas, and interviewing personnel.

Gomaco was previously inspected by an EPA contractor on July 10, 2013. The inspection led to a notice of preliminary findings. The findings included failure to close universal waste lamps container, failure to label and date universal waste lamp containers, treatment of hazardous waste without a RCRA permit, and storage of hazardous waste without a permit for longer than 270 days. Gomaco responded to the findings and no enforcement action was taken.

4.3 Facility Waste Streams and Management

A Waste Stream and Waste Handling Table for Gomaco 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	Scrap Metal	Manufacturing products	Nonhazardous (based on process knowledge and knowledge of the product)	20 cubic yards per month	20-cubic yard roll-off container	Schau Reecycling in Ida Grove, IA
2	Parts Washer Solvent (SDS included in Attachment 9)	Cleaning small, manufactured parts and tools	Nonhazardous (based on process knowledge and knowledge of the product)	Unknown – serviced as needed	In parts washer	Stern Oil Company in Freeman, SD (SDD080202088)
3	Used Oil	Facility maintenance	Nonhazardous (managed as used oil under 40 CFR 279)	165 gallons per year	55-gallon container	Transported by forklift across the street to Godbersen Equipment Company in Ida Grove, IA
4	Used Oil Filters	Facility maintenance	Nonhazardous/Excluded (based on process knowledge and knowledge of the product)	Less than 55-gallons per year	Punctured and hot drained and added to general trash	Ida County Sanitation in Ida Grove, IA
5	RCRA Empty Aerosol Cans (Brake Cleaner SDS included in Attachment 10)	Degreasing tools	Nonhazardous (based on process knowledge and knowledge of the product)	Six cans per month	Used aerosol cans are used until RCRA empty and added to general trash	Ida County Sanitation in Ida Grove, IA

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
6	Hazardous Waste Rags (Invoice included in Attachment 11)	Wiping off equipment with break cleaner	Nonhazardous (managed under exclusion per 40 CFR 261.4(a)(24))	One 10-gallon, and two 5-gallon containers are serviced monthly	One 10-gallon, and two 5-gallon containers	Aramark in Lexington, KY
7	Universal Waste Lamps (Invoice included in Attachment 12)	Facility maintenance	Nonhazardous /Excluded (managed as universal waste)	Two 4-foot containers and one 8-foot container per year	4-foot and 8-foot containers	A-TEC Recycling in Des Moines, IA (IA0000109827)
8	Wastewater (Invoice included in Attachment 13)	Rinsing off manufactured parts	Nonhazardous (based on process knowledge and knowledge of the product)	1,500 to 3,000 gallons per month	7,000-gallon blind sump	Picked up monthly by Hydro-Klean in Des Moines, IA (IAR000505990) and discharged via sanitary sewer to Ida Grove POTW
9	General trash	Facility operations	Nonhazardous (based on process knowledge and knowledge of the product)	10 cubic yards per week	5 cubic yard containers	Ida County Sanitation in Ida Grove, IA

4.4 Visual Inspection

Painting Operations:

Before the visual inspection began, Mr. Netherton explained the facility no longer operates a paint line. Mr. Netherton explained the paint line was removed from the facility in 2014 and all painting is now completed off site. During the visual inspection, I observed the area Mr. Brenner indicated where the paint line was located (see Attachment 3, Photo 2). Mr. Netherton explained this was the facility's only hazardous waste stream. Therefore, the facility has not generated hazardous waste since 2014. I did not observe any hazardous waste during the visual inspection.

Cutting Operations:

Gomaco operates cutting operations throughout the facility to manufacture concrete paving equipment. All assembly of the parts is completed off site. The process includes utilizing a coolant in the cutting operations. The coolant is a water-based coolant and is nonhazardous. The safety data sheet (SDS) for this coolant is provided in Attachment 14. A minimal amount of wastewater is generated. A larger amount of wastewater is generated when cleaning off manufactured parts. This wastewater enters a 7,000-gallon sump that is manually pumped to the sanitary sewer or hauled off site by a Hydro-Klean vacuum truck. I asked Mr. Netherton how the decision is made to discharge to the sanitary sewer or to have a Hydro-Klean vacuum truck vacuum out the sump. Mr. Netherton stated if the sump were to overflow, the facility would discharge the excess to the sanitary sewer. I asked Mr. Netherton if the facility had an agreement with the City of Ida Grove publicly owned treatment works (POTW) for this discharge. Mr. Netherton stated he believed the facility had an agreement. At the time of the inspection, Mr. Netherton could not provide me with an agreement. Mr. Netherton also stated they did not have a wastewater treatment plant on site. I explained my concern to the facility not being able to produce an agreement for discharge of wastewater and the facility's lack of knowledge of their discharge.

Solvent Contaminated Rags and Aerosol Cans:

During the visual inspection, I observed aerosol cans. I asked Mr. Netherton what the aerosol cans were used for. Mr. Netherton stated the aerosol cans were used for wiping off manufactured parts. I asked Mr. Netherton how the aerosol cans are managed. Mr. Netherton stated aerosol cans are used until they are RCRA empty and added into the general trash. Mr. Netherton explained if a can was damaged and was not RCRA empty, it would be placed in a closed container on site and managed as hazardous waste. The facility's primary aerosol used is a 3M brake cleaner. The SDS is provided in Attachment 10. The brake cleaner contains at least 60 percent acetone. The facility uses one 10-gallon and two 5-gallon red containers to accumulate all solvent contaminated rags. The containers are labeled with "Excluded Solvent Contaminated Wipes" and are picked up each month by Aramark for laundering. Aramark also provides Gomaco with various supplies. Mr. Netherton stated that the rags are invoiced together with all rags Aramark provides Gomaco. Mr. Netherton stated rags are also used for wiping oil. These

rag s are not placed in the red containers marked as “Excluded Solvent Contaminated Rag s”. The facility uses the same 10-gallon containers to accumulate oil rag s, but the containers are labeled “Rag s”. An invoice from Aramark is provided in Attachment 11. The one 10-gallon, and two 5-gallon containers accumulating solvent contaminated rag s were closed, labeled “Excluded Solvent Contaminated Wipes”, and in good condition. I asked Mr. Netherton if the wipes could contain any free liquids. Mr. Netherton stated the wipes added into the excluded containers would only include wipes that were defined to contain “No free liquids” per 40 CFR 260.10. Mr. Netherton stated the facility ensures all personnel are trained to not add any wipes that contain free liquids into the excluded containers. Based on the management practices of the excluded solvent contaminated rag s, I determined the facility is in compliance with the exclusions set forth in 40 CFR 261.4(a)(26).

Parts Washer:

During the visual inspection, I observed one parts washer. Mr. Netherton explained small tools and pieces of equipment could be cleaned in the parts washer. The parts washer solvent is nonhazardous and the SDS is provided in Attachment 9. Mr. Netherton stated the parts washer is serviced on an as needed basis. The most recent invoice is provided in Attachment 15. Mr. Netherton stated the facility ensures parts and tools cleaned with the 3M brake cleaner are not comingled in the parts washer in order to avoid cross contamination of the acetone in the brake cleaner.

Used Oil:

The facility generates approximately three 55-gallon containers of used oil per year. Mr. Netherton explained when a 55-gallon container was filled, the facility would transport the container across the street to the Gomaco Equipment Company (GEC) via forklift. Mr. Netherton explained GEC is not owned or operated by Gomaco. Mr. Netherton stated the used oil is burned in an oil heater located on GEC’s property. I asked Mr. Netherton if he knew if GEC had an EPA ID number and in what type of furnace or boiler the used oil was burned in. Mr. Netherton stated he was unaware of the type of furnace or boiler the used oil was burned in. Mr. Netherton stated he was unaware if GEC had an EPA ID number. I asked Mr. Netherton if the used oil was analyzed to meet used oil “on-spec” fuel specifications. Mr. Netherton stated Gomaco has not analyzed the used oil to meet certain specifications and assumed that the used oil met all specifications. I asked Mr. Netherton how often Gomaco transported used oil to GEC. Mr. Netherton stated approximately three 55-gallon containers are transported each year. I asked Mr. Netherton if Gomaco had records of each shipment. Mr. Netherton stated Gomaco did not keep records of the shipments. Lastly, I asked Mr. Netherton if Gomaco obtained from GEC; a one-time written and signed notice certifying that GEC has notified EPA of used oil management activities and of the type of industrial furnace or boiler being used is in accordance with 40 CFR 279.61(a)(1) and 40 CFR 279.1(a)(2). Mr. Netherton stated Gomaco did not obtain a one-time written notice, or any notice of the type of industrial furnace or boiler being used and if it was in

accordance with 40 CFR 279.61(a)(1) and 40 CFR 279.1(a)(2). Based on the following conversations, I left the following four findings:

NOPF 1 – Failure to only ship off-specification used oil to a burner who (a) has an EPA ID number and (b) burns the used oil in an industrial furnace or boiler identified in 40 CFR 279.61(a) [40 CFR 279.71(a) and 71(b)].

NOPF 2 – Failure to analyze the used oil to determine if it meets used oil “on-spec” fuel specifications [40 CFR 279.72(a)].

NOPF 3 – Failure to keep a record of each shipment of off-specification used oil that includes: name and address of the (1) transporter and (2) burner; EPA ID number of the (3) transporter and (4) burner; (5) quantity of used oil; and (6) date of shipment [40 CFR 279.74(a)(1) through (a)(6)].

NOPF 4 – Failure to obtain from the burner a one-time written and signed notice certifying that (1) the burner has notified EPA of used oil management activities, and (2) the burner will burn used oil only in an industrial furnace or boiler identified in 40 CFR 279.61(a), prior to sending the first shipment [40 CFR 279.75(a)(1) and (a)(2)].

Mr. Netherton explained he was unaware of these requirements. Mr. Netherton stated based on these requirements, the facility would work immediately to contact a transportation company such as Safety-Kleen to pick up the used oil in the future.

Universal Waste:

Gomaco manages a small amount of universal waste on site. I observed two 4-foot cardboard containers and one 8-foot-tall cardboard container of universal waste lamps. The container was located in southern corner of the main building as shown on the facility layout (see Attachment 1). I did not observe universal waste batteries during the visual inspection. Mr. Benner explained the facility’s maintenance staff bring tools from Gomaco’s Plant 2, on an as needed basis. All batteries are managed as universal waste at Gomaco’s Plant 2. If the facility generated universal waste batteries, Mr. Benner stated they would be placed in a 5-gallon container, labeled as “Universal Waste Batteries”, and dated with an accumulation start date. The container would then be brought to Gomaco’s Plant 2 approximately one mile away. The containers were labeled as universal waste batteries or universal waste lamps, closed, and dated with the start accumulation date. The earliest accumulation start date observed on the universal waste containers was September 8, 2020, which was present all universal waste lamp containers and is within one year of the inspection date. The most recent universal waste invoice is provided as an example in Attachment 12. I did not note any issues or findings at the universal waste accumulation area.

5.0 SUMMARY OF FINDINGS

NOPF 1 – Failure to only ship off-specification used oil to a burner who (a) has an EPA ID number and (b) burns the used oil in an industrial furnace or boiler identified in 40 CFR 279.61(a) [40 CFR 279.71(a) and 71(b)].

NOPF 2 – Failure to analyze the used oil to determine if it meets used oil “on-spec” fuel specifications [40 CFR 279.72(a)].

NOPF 3 – Failure to keep a record of each shipment of off-specification used oil that includes: name and address of the (1) transporter and (2) burner; EPA ID number of the (3) transporter and (4) burner; (5) quantity of used oil; and (6) date of shipment [40 CFR 279.74(a)(1) through (a)(6)].

NOPF 4 – Failure to obtain from the burner a one-time written and signed notice certifying that (1) the burner has notified EPA of used oil management activities, and (2) the burner will burn used oil only in an industrial furnace or boiler identified in 40 CFR 279.61(a), prior to sending the first shipment [40 CFR 279.75(a)(1) and (a)(2)].

Based on the facility’s used oil management practices discussed in Section 4.4 *Used Oil*, I determined the facility was not in compliance with Subpart H of 40 CFR for used oil fuel marketers.

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

**Janosh
Wolters**

Digitally signed by
Janosh Wolters
Date: 2021.09.10
16:16:09 -04'00'

Janosh Wolters
Energy Engineer
Date: September 10, 2021

**AMBER
WHISNANT**

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AMBER WHISNANT
Date: 2021.10.05
12:07:47 -05'00'

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

Attachments:

1. Facility Layout (1 page)
2. Gomaco Photolog (1 page)
3. Gomaco Photos (2 photos/3 pages)
4. EPA Inspection Checklist (15 pages)
5. Confidentiality Notice (1 page)
6. Receipt for Documents and Samples (1 page)

7. Notice of Preliminary Findings (1 page)
8. Hazardous Waste Site Info Verification for Inspector (1 page)
9. Parts Washer SDS (9 pages)
10. Brake Cleaner SDS – Aerosol Cans (14 pages)
11. Hazardous Waste Rags Laundering Service (2 pages)
12. Universal Waste Lamps Invoice (1 page)
13. Hydro Klean Invoice (1 page)
14. Coolant SDS (7 pages)
15. Stern Parts Washer Invoice (1 page)

Notice of Preliminary Findings

(For Contractor Use Only)

Facility Name: Gomaco Corporation Plant 1
Facility Address: 121 E Hwy 175 Ida Grove, IA 51445

EPA ID#: TAD984568519 Date: 07/27/2021

Notice: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for the EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to the EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and will make determinations as to what violations may have occurred at your facility.

Citation

Description of Finding

- | | |
|--|--|
| <u>1. 40 CFR 279.71(a) and 279.71(b)</u> | <u>1. Did not ship to a facility with an</u> |
| <u>2. 40 CFR 279.72(a)</u> | <u>EPA ID number.</u> |
| <u>3. 40 CFR 279.74(a)(1) through (a)(6)</u> | <u>2. Failure to analyze used oil met specifications</u> |
| <u>4. 40 CFR 279.75(a)(1) and (a)(2)</u> | <u>prior to shipments.</u> |
| | <u>3. Failure to keep records of each ship SW</u> |
| | <u>shipment.</u> |
| | <u>4. Failure to obtain one-time written</u> |
| | <u>and signed notice certifying the burner</u> |
| | <u>has notified EPA of used oil management</u> |
| | <u>activities and the burner will burn used oil</u> |
| | <u>only in an industrial furnace or boiler</u> |
| | <u>identified in 40 CFR 279.6(a).</u> |

If you have any questions about this Notice or wish to discuss your response, you may call me at
484-678-8675, or Trevor Urban (Compliance Officer)
at 913-551-7133.

This Notice prepared by Janosh Wolkers Date: 07/27/2021

The undersigned person hereby acknowledges receipt of this Notice and has read the same.

Printed Name: Greg Ebersole Date: 7-27-21
Signature: Greg Ebersole
Title: Safety Director

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(Rev: 2/25/2020)

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