

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

Waste Management – Sioux City

1220 Steuben Street
Sioux City, IA 51105
(262) 250-8700

EPA ID Number: IAR000522086

On

January 11, 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 Waste Management – Sioux City (WMSC) in Sioux City, Iowa on January 11, 2021. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. Due to the facility no longer operating, no data and information was collected except for photographs. The inspection report and attachments present the results of the CEI.

2.0 PARTICIPANTS

Waste Management (adjacent site at 1230 Steuben Street):

Mike Ellingworth, Route 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 attempted to contact the facility via telephone approximately two weeks prior to the inspection to discuss any facility-specific safety protocols to ensure the safety of all personnel involved during the inspection. I was unable to reach the listed facility contact via telephone. After arriving unannounced at WMSC at approximately 06:45, I performed a drive-by tour of the facility. The facility appeared to be unoccupied. I took photographs of the facility exterior prior to beginning the inspection and did not note any areas of concern. The facility at 1220 Steuben Street was unoccupied and did not appear to be in operation. Mr. Wieber and I then entered the adjacent facility at 1230 Steuben Street, also owned by Waste Management, at approximately 07:20 to inquire further regarding the unoccupied space at WMSC next-door. After entering the 1230 Steuben Street facility, we encountered Mr. Ellingworth, who appeared to be the only employee present at the site. I introduced myself, presented my inspector credentials, and informed Mr. Ellingworth that we were present to inspect the WMSC facility at 1220 Steuben Street. 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. Mr. Ellingworth stated that he had worked at the 1230 Steuben Street facility as a Route Manager for approximately one year, was the only employee representative on site and the adjacent site at 1220 Steuben Street had been unoccupied prior to his employment. Mr. Ellingworth stated that Waste Management still owns the property at 1220 Steuben Street but that the site is unused and is a "house for pigeons". I informed Mr. Ellingworth that we would still visually inspect the WMSC 1220 Steuben Street site, and Mr. Ellingworth accompanied us to the site. I then presented Mr. Ellingworth with my business card as well as the business card of the EPA Task Order Contracting Officer Representative, Mr. Trevor Urban.

The inspection consisted of a visual inspection of the exterior grounds and interior warehouse area at the WMSC 1220 Steuben Street site. An overview image of the facility from Google Earth with labels added by ERG is included as Attachment 1.

Nine photographs were collected as inspection documentation and are shown in Attachments 2 and 3. The warehouse area at WMSC showed signs of deterioration and was no longer in use, as stated by Mr. Ellingworth. Miscellaneous empty containers and pallets were present inside the warehouse area at the time of the inspection while other areas of the warehouse were empty (see Attachment 3, Photos 5, 6, and 9). Mr. Ellingworth stated that the containers in the warehouse area had been present since he had started employment and are not actively used by Waste Management. The exterior grounds also did not appear to have any activity (see Attachment 3, Photos 7 and 8).

At the time of the inspection, the facility at 1220 Steuben Street was unoccupied and had ceased operations. The Hazardous Waste Site Info Verification Report for Inspector (see Attachment 4) was updated to reflect the observations seen at the time of the inspection.

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

The 1220 Steuben Street site was formerly operated by Recycletronics, which leased the property from Waste Management beginning in September 2016. Recycletronics operated as an electronics recycler with activities including management of cathode ray tubes (CRTs). The Recycletronics facility was contained within the 22,000-square foot building still located onsite. Based on the EPA RCRA Record Document Inventory, the owner of Recycletronics, Aaron Rochester, was issued a letter of warning/request for information after a CEI on December 13, 2016, due to mismanagement of waste on site in accordance with RCRA, particularly regarding CRTs which contain leaded glass. A follow-up inspection and correspondence with Recycletronics resulted in a Consent Agreement and Final Order (CAFO) issued on November 29, 2017 (see Attachment 6). The CAFO included provisions to cease all CRT processing and remove all leaded glass, which was disposed as a D008 characteristic hazardous waste. Based on email correspondence and the Waste Management Consent Agreement Concurrence Packet (see Attachment 7), the facility was instructed to request an EPA ID number for the Waste Management – Sioux City at the 1220 Steuben Street site in July 2018, in order to facilitate removal of waste from the site (EPA ID IAR000522086). On November 21, 2019, EPA Region 7 approved a completion report submitted by Waste Management and determined that all actions required by the CAFO had been completed (see Attachment 8).

4.2 RCRA Status

According to the Hazardous Waste Site Info Verification Report for Inspector (see Attachment 4), WMSC notified as a federal LQG of D008 hazardous waste with a designation of short-term generation. After walking through the facility, I determined that the facility no longer generates hazardous waste. WMSC no longer operates at the 1220 Steuben Street, Sioux City, Iowa site.

WMSC was previously inspected on July 8, 2019, as a Case Development Inspection under the CAFO issued at the site (as detailed in Section 4.1 of this report). The inspection did not lead to any findings. EPA Region 7 approved a completion report submitted by Waste Management and determined that all actions required by the CAFO had been completed on November 21, 2019.

4.3 Facility Waste Streams and Management

WMSC no longer generates or handles waste streams at the site.

5.0 SUMMARY OF FINDINGS

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: February 11, 2021

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

Attachments

- 1) Attachment 1 - Facility Overview Map (1 page)
- 2) Attachment 2 – Waste Management – Sioux City Photolog (1 page)
- 3) Attachment 3 – Waste Management – Sioux City Photos (9 Photos, 10 pages)
- 4) Attachment 4 - Hazardous Waste Site Info Verification Report for Inspector (1 page)
- 5) Attachment 5 – EPA Checklist (4 pages)
- 6) Attachment 6 - Consent Agreement and Final Order (29 pages)
- 7) Attachment 7 – Waste Management Consent Agreement Concurrence Packet (33 pages)
- 8) Attachment 8 - Waste Management Completion Report (2 pages)