

# REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

**PMX Industries Inc**  
5300 Willow Creek Dr SW  
Cedar Rapids, IA 52402  
(319)-368-7700

EPA ID Number: IAD984571802

On April 22, 2021 - April 23, 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 PMX Industries Inc (PMX) in Cedar Rapids, Iowa, on April 22-23, 2021. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. During the CEI, information and data 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

PMX Industries Inc:

Mark Lob, Wastewater Treatment Manager

EPA Representatives, ERG:

Joseph Watson, Senior Chemical Engineer (Lead Inspector)

Christopher Buccellato, Junior Chemical Engineer

### 3.0 INSPECTION PROCEDURES

Due to the COVID-19 pandemic, I contacted the facility via telephone and spoke with Mr. Lob approximately two weeks 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 PMX at approximately 08:00, I performed a drive-by visual inspection of the facility and took a photo of the facility entrance prior to beginning the inspection and did not note any areas of concern. I then parked in the parking lot and entered through the main entrance at 08:05. I introduced myself to Mr. Lob and explained the purpose of the inspection. I presented my inspector credentials and a business card of the EPA Task Order Contracting Officer Representative, Mr. Trevor Urban. Mr. Buccellato introduced himself. 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. Lob with a copy of Title 18 U.S. Code, Sections 1001 and 1002. I also provided Mr. Lob with a copy of the *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections* and reviewed PMX's confidentiality rights with him. Mr. Lob was informed that a *Confidentiality Notice* would be provided at the end of the 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. Lob provided a facility layout and explained facility operations and locations of hazardous waste generation and handling (see Attachment 1).

During the visual inspection of the facility, Mr. Lob guided us through each section of the facility, in order to conduct thorough evaluations of the facility's satellite accumulation areas (SAAs) and central accumulation area (CAA). At the time of the inspection, the facility was operating seven SAAs and one CAA located in the Chemical Storage Area. The facility also handles universal waste in the CAA which Mr. Buccellato and I also visually inspected. Mr. Buccellato and I also visually inspected the area where the facility collects and stores scrap metals to be recycled. Mr. Buccellato and I conducted an in-depth visual inspection of the seven SAAs, the CAA, and the universal waste area.

Sixteen 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. Lob with a *Confidentiality Notice*, *Receipt of Documents and Samples*, and *Notice of Preliminary Findings* which Mr. Lob signed as acknowledgement of receipt (see Attachments 5, 6, and 7 respectively). No confidentiality claims were made by PMX.

The following inspection documents and compliance assistance handouts were left with Mr. Lob:

*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**

PMX is a copper foundry and rolling mill. PMX melts virgin and recycled copper, brass, and nickel to produce ingots with varying concentrations of copper. Slag and dross produced by the copper foundry are sold for metal recovery, and occasionally disposed of as waste. The facility has sixteen baghouse collection units used to capture dust generated from casting operations.

Within the facility, PMX has several mills that are used to roll copper into thin sheets. Lubricating oil is used to facilitate the rolling process. As much lubricating oil as possible is collected and recycled using an internal recycling process. The remaining oil is collected and managed as nonhazardous waste and shipped offsite for recycling. Adsorbent pads contaminated with oil are also collected and managed as nonhazardous waste and shipped offsite for disposal. Oily rags and personal protective equipment (PPE) contaminated with oil, are considered nonhazardous, and are laundered and returned to the facility.

After rolling, the copper sheets are passed through either an acidic or caustic bath. The corrosive baths produce different finishes for varying copper alloys. PMX stamps and shapes copper sheets for specific clients. PMX also rolls copper and tin into sheets that are used at the US Mint. The rolled copper sheet is bathed in acidic flux prior to rolling the copper and tin sheets together into one rolled product. Used caustic, acidic, and flux baths are neutralized and processed at the on-site wastewater treatment plant. Aerosol spray paint is used throughout the facility to mark copper rolls. PMX also has a forklift maintenance and repair area, as well as a facility

maintenance and machine shop.

PMX generates oily water as its primary waste. The oily water is processed in the wastewater treatment plant, which also generates used oil waste stream. PMX discharges its wastewater, among other wastes, in accordance with a Special Waste Discharge Authorization from Linn County.

PMX produces some paint waste from general painting and maintenance operations. PMX also generates spent fluorescent lamps and parts washer solvent. Spent lamps are collected and managed as universal waste in the CAA. Nine parts washers using aqueous nonhazardous solvent are located throughout the facility including the maintenance area, the forklift maintenance area, and casting maintenance area. The parts washers are serviced by Crystal Clean with varying service schedules. The facility is in the process of replacing all of their Safety-Kleen parts washers with aqueous nonhazardous solvent parts washers. There is one Safety-Kleen parts washer in the casting maintenance area that needs to be replaced with a Crystal Clean parts washer.

PMX operates within a space of approximately 900,000 square feet (ft<sup>2</sup>) warehouse space. Approximately ten percent of this space is used for offices and administrative use. PMX has approximately 400 employees and operates three shifts, 12 hours on/12 hours off, every day of the week.

#### **4.2 RCRA Status**

According to the *Hazardous Waste Site Info Verification Report for Inspector*, PMX notified as a federal Large Quantity Generator (LQG) of D001, D003, D006, D008, D018, and D035 characteristic hazardous waste, F003 and F005 listed hazardous wastes, and U154 toxic hazardous waste (see Attachment 8). I reviewed the *Hazardous Waste Site Info Verification Report for Inspector* with Mr. Lob during the inspection. He indicated that PMX was also a small quantity handler for universal wastes, due to the facility's storage of spent lamps on-site. After reviewing the facility's records, a visual inspection of the process, and interviewing personnel, I determined that the facility was a Small Quantity Generator (SQG) of D001, D002, D003, D004, D007, D008, D009, D018, and D035 characteristic hazardous waste, and F003 and F005 listed hazardous wastes. PMX has been operating as a SQG since October 2020 based on review of the hazardous waste manifests and observations of the SAAs and CAA. Mr. Lob stated that PMX should maintain its SQG status unless there is a significant change in the production process.

PMX was previously inspected from September 10-14, 2014. The inspection led to a notice of preliminary findings (NOPFs). The findings included failure to mark a SAA with a "hazardous waste" label or identify the contents, failure to mark an accumulation start date on hazardous waste in accumulation, failure to mark an accumulation start date on hazardous waste in accumulation, failure to perform weekly inspections of a hazardous waste accumulation container, failure to accumulate hazardous waste in a closed hazardous waste accumulation container, and failure to mark a universal waste lamps accumulation container with the words

“universal waste lamps” or an accumulation start date.

### **4.3 Facility Waste Streams and Management**

A Waste Stream and Waste Handling Table for PMX 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 | Waste Bonding Mill<br>Vanishing Lubricant                                   | Bonding mill operations                                 | D001 (based on process knowledge and knowledge of the product)                               | 500 gallons per year                             | 55-gallon container in SAA next to bonding mill                     | WRR Environmental Services Eau Claire, Wisconsin (WID990829475)   |
| 2 | Baghouse Dust (bill of lading to a metal recycler included as Attachment 9) | Casting baghouse operations                             | Nonhazardous, labeled and sold as brass scrap                                                | Variable up to 10,000 pounds per month           | Collected in 1-cubic yard container underneath each baghouse        | Various recyclers including Recovered Asset Management Harvey, IL |
| 3 | Waste Tin Dross (waste profile included as Attachment 10)                   | Scrap from tin line cleanout                            | D008 (based on process knowledge and knowledge of the product)                               | Two 55-gallon containers per year                | Accumulated in 55-gallon container during cleanout and moved to CAA | WRR Environmental Services Eau Claire, Wisconsin (WID990829475)   |
| 3 | Waste Aerosol Residuals                                                     | Vanishing lube and spray paint for marking copper rolls | D001 (based on knowledge of the product)                                                     | One 55-gallon container per year                 | Accumulated in 55-gallon container in CAA                           | WRR Environmental Services Eau Claire, Wisconsin (WID990829475)   |
| 4 | Waste Paint (waste profile included as Attachment 11)                       | Painting operations in maintenance area                 | D001, D008, D018, D035, F003, F005 (based on process knowledge and knowledge of the product) | One 55-gallon container every two to three years | Accumulated in 55-gallon container in maintenance area              | WRR Environmental Services Eau Claire, Wisconsin (WID990829475)   |

|   |                                                                                                    |                                                                             |                                                                          |                                                      |                                               |                                                                 |
|---|----------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|--------------------------------------------------------------------------|------------------------------------------------------|-----------------------------------------------|-----------------------------------------------------------------|
| 5 | Lab Pack                                                                                           | Waste material or used/expired products in maintenance/damaged aerosol cans | D001, D002, D003, D004, D007 (based on process knowledge of the product) | Highly variable (465 lbs. in 2019 was last shipment) | None currently stored on site                 | WRR Environmental Services Eau Claire, Wisconsin (WID990829475) |
| 6 | Used Oil                                                                                           | Drawing process, forklift maintenance, wastewater treatment recovery        | Nonhazardous (managed as used oil under 40 CFR 279)                      | ~2,000 gallons per year                              | 9,000-gallon storage aboveground storage tank | Heritage-Crystal Clean, LLC Indianapolis, IN (INR000006536)     |
| 7 | Used Air/Oil Filters                                                                               | Process area, oil filters on machinery and coolant areas                    | Nonhazardous (based on process knowledge of the product)                 | 8-10 1-cubic yard containers per year                | One cubic yard tote                           | Iowa Gold Distributing (Central City, IA)                       |
| 8 | Oil/Coolant Absorbent Material Contaminated Rags, Gloves (waste profile included in Attachment 12) | Rolling process areas                                                       | Nonhazardous (based on process knowledge of the product)                 | 30 55-gallon containers per year                     | 55-gallon containers in baghouse              | Covanta Cedar Rapids, IA (IAR000516559)                         |

|    |                                                                                           |                                    |                                                                                                                                      |                                                                                                                              |                                                         |                                                                                                                                                                                                              |
|----|-------------------------------------------------------------------------------------------|------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 9  | Oily Water                                                                                | Facility and equipment maintenance | Nonhazardous (based on process knowledge and product)                                                                                | ~2,500 gallons per year                                                                                                      | 275-gallon and 55-gallon containers                     | Treated at WWTP and discharged to POTW                                                                                                                                                                       |
| 10 | Spent Lamps (certificates of recycling included in Attachment 13)                         | Facility maintenance               | Nonhazardous (managed as universal waste), broken lamps or any mercury containing equipment would be managed as D009 hazardous waste | One 4-ft and one 8-ft every other year                                                                                       | Accumulated in labeled, closed boxes located in the CAA | A-TEC Recycling Inc.<br>Des Moines, IA<br>(IA0000109827)<br>Industrial Waste Conversion Co.<br>Staples, MN<br>(MND985667997)<br><br>Veolia ES Tech<br>Solutions LLC Port<br>Washington, WI<br>(WID988566543) |
| 11 | Spent Parts Washer Solvent (SDS for spent parts washer solvent included in Attachment 14) | Facility maintenance               | Nonhazardous (based on process knowledge and product)                                                                                | Solvents swapped out of nine parts washers on varying schedule.(installation and service receipts included in Attachment 15) | 15-gallon to 200-gallon parts washers                   | Heritage-Crystal Clean, LLC Indianapolis, IN<br>(INR000006536)                                                                                                                                               |

|    |                                                                                                                                             |                                   |                                                                        |                                   |                                                              |                                                                                                                                             |
|----|---------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|------------------------------------------------------------------------|-----------------------------------|--------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| 12 | Used Batteries<br>(certificates of recycling included in Attachment 13)                                                                     | Facility maintenance              | Nonhazardous (managed as universal waste)                              | Approximately 500 pounds per year | Accumulated in labeled, closed containers located in the CAA | A-TEC Recycling Inc.<br>Des Moines, IA<br>(IA0000109827)                                                                                    |
| 13 | Scrap Metal                                                                                                                                 | Packaging and facility operations | Nonhazardous (based on process knowledge and knowledge of the product) | Generation rate not determined    | Various containers throughout the facility                   | Picked up by Alter Scrap Processing Cedar Rapids, IA<br>(IA0000082057) and various metal mills through third party brokers.                 |
| 14 | Wastewater treatment sludge (Special Waste Authorization Letter included as Attachment 16 and analytical results included in Attachment 17) | Wastewater treatment plant        | Nonhazardous (based on process knowledge and analytical testing)       | Generation rate not determined    | 1-cubic yard containers                                      | Dumpster collected by ABC Disposal Systems, Inc. in Hiawatha, IA, disposed of at the Cedar Rapids/Linn County Solid Waste Agency Marion, IA |

|    |                                                                                                                                               |                                                                                                                     |                                                                        |                                    |                                            |                                                                                                                                             |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|------------------------------------|--------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| 15 | Oily rags and PPE                                                                                                                             | Facility maintenance and operations                                                                                 | Nonhazardous (based on process knowledge and knowledge of the product) | Approximately 1,000 items per week | Various containers throughout the facility | CITY Laundering Cedar Rapids, IA                                                                                                            |
| 16 | General Trash (Special Waste Authorization Letter included as Attachment 16 and waste profile for baghouse filters included in Attachment 18) | Packaging and facility operations to include special waste such as baghouse filters and wastewater treatment sludge | Nonhazardous (based on process knowledge and knowledge of the product) | Generation rate not determined     | Various dumpsters on site                  | Dumpster collected by ABC Disposal Systems, Inc. in Hiawatha, IA, disposed of at the Cedar Rapids/Linn County Solid Waste Agency Marion, IA |

#### 4.5 Less-Than-180-Day Hazardous Waste Accumulation Area

PMX has one Less-Than-180 Day CAA on site, which is located in a room at the Wastewater Treatment Plant. I visually inspected the CAA at approximately 1:15 and observed three 55-gallon containers of hazardous waste (see Attachment 3, Photo 14). Two of the 55-gallon container held waste tin dross from a clean out of the tin line (D008) and one 55-gallon container of waste stamping lubricant (D001). The waste tin dross containers had an accumulation start date of April 13, 2021, and the waste stamping lubricant container had an accumulation start date of March 4, 2021. There were four 1-cubic yard containers of nonhazardous waste sodium meta disulphite, which was unused. There was also an aerosol can puncture unit in a flammable cabinet storing waste aerosol residuals (see Attachment 3, Photo 13). The containers were closed, in good condition, labeled as “Hazardous Waste”, and indicated the nature of the hazard. The CAA also held several other 55-gallon containers of nonhazardous waste. This included six 55-gallon containers of nonhazardous grease/lubricant (see Attachment 3, Photo 16), as well as 14 55-gallon containers of nonhazardous used oily pads (see Attachment 3, Photo 15). I observed a fire extinguisher, spill control equipment, and related safety equipment within the CAA.

I reviewed the management of the CAA, and no issues or findings were noted regarding the hazardous waste observed in the CAA. I noted issues and left findings for universal waste stored in the CAA as explained in Section 4.7 of this report.

#### 4.6 Satellite Accumulation Areas

I observed seven satellite areas at PMX while on site. The table below shows the SAA name or location, waste type, volume of waste observed, and container type.

| SAA # | SAA Name or Location      | Waste Type   | Volume of Waste | Container Type |
|-------|---------------------------|--------------|-----------------|----------------|
| 1     | Forklift/Maintenance Area | Aerosol Cans | 55 gallons      | Drum           |
| 2     | Copper Rolling Area       | Aerosol Cans | 55 gallons      | Drum           |
| 3     | Machine Shop              | Aerosol Cans | 55 gallons      | Drum           |
| 4     | Casting Maintenance       | Aerosol Cans | 55 gallons      | Drum           |
| 5     | Milling Area              | Aerosol Cans | 55 gallons      | Drum           |
| 6     | Milling Area              | Aerosol Cans | 55 gallons      | Drum           |

|   |         |              |            |      |
|---|---------|--------------|------------|------|
| 7 | BK Area | Aerosol Cans | 55 gallons | Drum |
|---|---------|--------------|------------|------|

All hazardous waste accumulation containers observed in the SAAs were in good condition and closed, labeled with the indication of the nature of the hazard, and labeled with the words “Hazardous Waste”. An example of container labeling and management in SAAs at PMX is provided in Attachment 3, Photo 2. When a container is filled with aerosol cans, it is moved to the CAA. In the CAA, aerosol cans are punctured in an aerosol can puncture unit and any liquid falls into the red 55-gallon container. The punctured cans are placed in the black 55-gallon container and recycled as scrap metal.

I did not note any findings or concerns at any of the satellite accumulation areas.

#### 4.7 Universal Waste Accumulation Area

PMX manages universal waste in a collection area in the CAA. At the time of the inspection, an 8-ft and a 4-ft universal waste container for used fluorescent lamps were observed in the universal waste accumulation area. The 8-ft container was labeled “Universal Waste Lamps”, was closed and in good condition but indicated a start date of January 25, 2019, which is more than a year before the date of the inspection (see Attachment 3, Photo 8). The 4-ft container was had a universal waste label, but the label did not identify used lamps and it did not have an accumulation start date (see Attachment 3, Photos 9 and 10). The 4-ft container was closed and in good condition. Mr. Lob stated that he had not noticed the 4-ft and 8-ft cardboard universal waste containers tucked in the corner of the CAA. The facility did provide a certificate of recycling of universal wastes fluorescent lights and batteries from June 2019 (see Attachment 19).

**NOPF 1 – Accumulated universal waste longer than one year with an 8-ft box containing used florescent lamps had accumulation start date January 25, 2019 [40 CFR 273.15(a)].**

**NOPF 2 – One 4-ft container of universal waste lamps was not labeled as “Universal Waste – Used Lamps” [40 CFR 273.14(e)].**

**NOPF 3 – One 4-ft container of universal waste lamps was not dated and did not demonstrate the amount of time the universal waste was accumulated [40 CFR 273.15(c)].**

#### 4.8 Other Regulatory Requirements

Preparedness, Prevention, and Emergency Requirements - Safety and emergency equipment were present and in satisfactory condition. Emergency preparedness information was posted in the CAA and in operations areas throughout the facility. The information was up-to-date and accurate.

I reviewed the preparedness, prevention, and emergency requirements and no findings were noted.

Contingency Planning Requirements - The contingency plan was on file electronically and in a binder and was reviewed while on site (see Attachment 20). The contingency plan was prepared when PMX was a LQG, and they have maintained the contingency plan. PMX is not required to maintain a contingency plan as a SQG. I reviewed the contingency plan as a courtesy during the inspection. The contingency plan included emergency evacuation routes, emergency response procedures, emergency coordinators and contact information, and a list of emergency response equipment.

I reviewed the entire RCRA contingency plan, and no findings were noted.

Personnel Training Requirements – Responsible personnel are to be trained to be knowledgeable in the handling and management of hazardous and universal wastes. Based on the universal waste findings identified, I asked Mr. Lob what type of universal waste training is provided to the environmental technicians. Mr. Lob provided me with a copy of the training guidelines for environmental technicians (see Attachment 21) which did not identify any hazardous or universal waste training for the proper handling and emergency procedures appropriate to the types of universal waste and hazardous waste handled at the facility. I asked Mr. Lob if any universal waste or hazardous waste awareness training was provided to the environmental technicians. Mr. Lob had stated that he was under the impression that the environmental technicians had taken RCRA training at a local college but that he was unable to find any supporting documentation and concluded that it did not appear they took any training. Mr. Lob stated that he would provide the environmental technicians with universal waste and hazardous waste training and ensure they are knowledgeable in the handling and management of hazardous and universal wastes. I concluded that environmental technicians were not provided training to allow them to be knowledgeable in the handling and management of hazardous and universal wastes and identified the following findings.

**NOPF 4 – Training for environmental technicians was not provided for them to be knowledgeable in the handling and management of hazardous wastes. This included moving the hazardous waste between SAAs and the CAA [40 CFR 262.16(b)(9)(iii)].**

**NOPF 5 – Training for environmental technicians was not provided for them to be knowledgeable in the handling and management of universal waste [40 CFR 273.16].**

Other Regulatory Programs – PMX provided copies of their past weekly container storage inspection forms, several of which can be seen in Attachment 22. Between 9/9/20 and 10/5/20, the facility did not perform its weekly hazardous waste container storage inspections. Mr. Lob stated that when he inspects the CAA, he still continues to fill out the weekly inspection form even though he does not have to as a SQG. I asked Mr. Lob what the reason for the gap in the weekly inspections was. Mr. Lob stated that he started conducting the weekly inspections when he took over the program in October 2020, but his predecessor did not conduct weekly inspections towards the end of his tenure. Mr. Lob also stated that PMX transitioned between

two different environmental compliance managers in September of 2020.

**NOPF 6 – Weekly inspections were not conducted in September 2020, with inspections only conducted 8/31, 9/9, and 10/5 [40 CFR 262.16(b)(2)(iv)].**

## **5.0 SUMMARY OF FINDINGS**

**NOPF 1 – Accumulated universal waste longer than one year with an 8-ft box containing used florescent lamps had accumulation start date January 25, 2019 [40 CFR 273.15(a)].**

PMX stored universal waste lamps in an 8-ft container in the CAA for more than two years.

**NOPF 2 – One 4-ft container of universal waste lamps was not labeled as “Universal Waste – Used Lamps” [40 CFR 273.14(e)].**

PMX stored universal waste lamps in a 4-ft container in the CAA without identifying the waste in the container as used lamps.

**NOPF 3 – One 4-ft container of universal waste lamps was not dated and did not demonstrate the amount of time the universal waste was accumulated [40 CFR 273.15(c)].**

PMX stored universal waste lamps in a 4-ft container in the CAA without an accumulation start date or any other information to determine how long the lamps have been accumulating.

**NOPF 4 – Training for environmental technicians was not provided for them to be knowledgeable in the handling and management of hazardous wastes. This included moving the hazardous waste between SAAs and the CAA [40 CFR 262.16(b)(9)(iii)].**

PMX must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies. Training guidelines for environmental technicians did not include this type of training.

**NOPF 5 – Training for environmental technicians was not provided for them to be knowledgeable in the handling and management of universal waste [40 CFR 273.16].**

PMX must provide training that describes the proper handling and emergency procedures appropriate to the types of universal waste handled at the facility. Training guidelines for environmental technicians did not include this type of training.

**NOPF 6 – Weekly inspections were not conducted in September 2020, with inspections only conducted August 31, 2020, September 9, 2020, and October 5, 2020 [40 CFR 262.16(b)(2)(iv)].**

PMX did not conduct weekly inspections of the CAA during the transition to the environmental

manager.

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

**Joseph  
Watson**

Digitally signed by  
Joseph Watson  
Date: 2021.06.18  
17:30:13 -04'00'

Joseph Watson  
Senior Chemical Engineer  
Date: 6/18/2021

**AMBER  
WHISNANT**

Digitally signed by AMBER  
WHISNANT  
Date: 2021.06.28 22:03:04  
-05'00'

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

#### Attachments

- 1) Attachment 01 - Facility Layout (3 pages)
- 2) Attachment 02 - PMX Industries Photolog (1 page)
- 3) Attachment 03 - PMX Industries Photos (16 photos/17 pages)
- 4) Attachment 04 - PMX Industries EPA SQG Inspection Checklist (24 pages)
- 5) Attachment 05 - PMX Industries Confidentiality Notice (1 page)
- 6) Attachment 06 - PMX Industries Receipt for Documents and Samples (1 page)
- 7) Attachment 07 - Notice of Preliminary Findings PMX Industries (1 page)
- 8) Attachment 08 - Site Information Verification Report PMX Industries (1 page)
- 9) Attachment 09 - Bill of Lading Baghouse Dust (2 pages)
- 10) Attachment 10 - Waste Profile Tin Line Refining Dross (8 pages)
- 11) Attachment 11 - Waste Profile Paint Waste (6 pages)
- 12) Attachment 12 - Waste Profile Wiping Pads (5 pages)
- 13) Attachment 13 - Universal Waste Certificates of Recycling (2 pages)
- 14) Attachment 14 - SDS Heritage-Crystal Clean and Safety-Kleen Parts Washer Solvents (12 pages)
- 15) Attachment 15 - Receipts for New Parts Washers Installation and Service (8 pages)
- 16) Attachment 16 - Special Waste Authorization Letter (2 pages)
- 17) Attachment 17 - Analytical Results for Filter Press Sludge (5 pages)
- 18) Attachment 18 - Waste Profile Baghouse Filters (7 pages)
- 19) Attachment 19 - Hazardous Waste Manifests (13 pages)
- 20) Attachment 20 - Hazardous Waste Contingency Plan (15 pages)
- 21) Attachment 21 - Training Guidelines Environmental Technician (4 pages)
- 22) Attachment 22 - Weekly Inspection Forms (3 pages)

## NOTICE OF PRELIMINARY FINDINGS

**FACILITY NAME:**

**ADDRESS:**

5300 Willow Creek Drive SW

Cedar Rapids, IA 52404

**EPA ID NUMBER:**

IAD984571802

**DATE:**

4/22/7021

**NOTICE:** I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for 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 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 making the determinations as to what violations may have occurred at your facility.

- [illegible]

If you have any questions regarding these findings please  
contact

The undersigned person hereby acknowledges receipt of a copy of this document and has read the same.

**PRINTED NAME:**

MARK A. LOB

**TITLE:**

WWT main gas

**SIGNATURE:**

\_\_\_\_\_

This document was prepared by

Joseph Watson