

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At
CB&I Storage Tank Solutions, LLC
9600 Hickman Road
Clive, Iowa 50325
(515) 254-9613

EPA ID Number: IAD981504855

On

April 13, 2022

By

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

1.0 INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division, I conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at CB&I Storage Tank Solutions, LLC (CB&I) located in Clive, Iowa, on April 13, 2022. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. CB&I was most recently inspected for RCRA compliance April 6, 2006. Findings documented during the April 6, 2006 CEI appear in Section 5, Summary of this report. During this inspection, I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. The inspection report and attachments present the results of the CEI.

2.0 PARTICIPANTS

CB&I:

Donald Reha II, Clive Plant Personnel/HSES Manager, approximately 31 years with the company and approximately 21 years in his current position.

U.S. Environmental Protection Agency (EPA):

H. D. "Doug" Bryant, CPP, PCI, Civil Investigator, NOWCC/SEE, ECAD/Chemical Branch/RCRA Section.

3.0 INSPECTION PROCEDURES

Prior to beginning the inspection, I conducted a visual reconnaissance of CB&I on April 13,

2022, searching for areas of concern observable from the adjacent roadway. No environmental issues or areas of concern were observed during this preliminary examination.

I arrived unannounced at CB&I at approximately 0830 hours, April 13, 2022. I parked outside a two-story building located at the south end of a very large building that housed manufacturing equipment. I entered the second-story entrance, and a training class was in progress. I waited until the instructor finished his presentation. I discovered that the instructor was my facility contact, Mr. Donald Reha II. We exchanged greetings, I briefly showed Mr. Reha my EPA Credentials and explained the purpose of my visit. We moved from the training class room to a conference room located on the far northeastern end of the plant building. This conference room was used as a work area throughout this CEI.

I began my formal entry briefing, presented my EPA Credentials again, and Mr. Reha and I exchanged business cards (Attachment 1). I next presented Mr. Reha a copy of RCRA section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented him a copy of Title 18 U.S. Code, Sections 1001 and 1002. He was made aware of his confidentiality rights and was informed that a Confidentiality Notice would be provided at the end of the inspection to make or not to make any claims. Mr. Reha acted as the official facility representative throughout this inspection.

The inspection consisted of an entry briefing, a discussion of facility operations, waste generation and waste management, a review of waste management records, emergency preparedness and planning, and a visual inspection of the waste generation and management areas. Mr. Reha provided a site map/diagram of the facility (Attachment 2).

Document photocopies and 26 photographs were collected as inspection documentation (Attachments 1-22). Information collected during the CEI was recorded on a checklist and in field notes. I followed the inspection procedures discussed in the RCRA Compliance Evaluation Inspection Standard Operating Procedure (No. 2321.1C), unless noted differently.

At the conclusion of the inspection, I conducted an exit briefing, during which I summarized my findings and recommendations with Mr. Reha. I provided Mr. Reha a *Confidentiality Notice*, which he signed, indicating no confidentiality claims were made by the facility (see Attachment 3). I provided Mr. Reha a *Receipt of Documents and Samples* which he signed acknowledging receipt (Attachments 4). I provided Mr. Reha a *Notice of Preliminary Findings* which he signed acknowledging receipt (Attachment 5).

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

Section 3007 Inspections Sheet (EPA Handout)

RCRA Facility Access Information Sheet (EPA Handout)

United States Code Annotated (EPA Handout)

Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections (EPA Handout)

Notice of Preliminary Findings (EPA Handout)
Instructions for Responding to a Notice of Preliminary Findings (NOPF) (Reverse of NOPF)
U.S. EPA Small Business Resource Information Sheet (EPA Handout)
Solvent-Contaminated Wipes Final Rule Chart (EPA Handout)
Excluded Solvent-Contaminated Wipe Rule (IDNR Handout)
Battery Recycling/Disposal (IDNR Handout)
Universal Wastes Including Aerosol Cans (IDNR Handout)
Environmental Compliance Assistance Centers (EPA Handout)
e-Manifest Fact Sheet (EPA Handout)
RCRA Online A Quick Reference Guide (EPA Handout)
Emergency Response Program (EPA Handout)
Security Awareness (EPA Handout)
Managing Your Hazardous Waste: A Guide for Small Business (EPA Handout)

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

This facility is located in a mixed industrial area located northwest of the Des Moines metropolitan area. The facility was originally constructed in 1953. The facility sits on approximately 10 acres and features a large industrial crane, railhead, and truck loading areas. CB&I has 55 employees working 10-hour shifts, Monday through Thursday. The facility occupies approximately 185,000 square feet under roof. The North American Industry Classification System (NAICS) code for this facility is 332313 – Plate Work Manufacturing.

CB&I manufactures large storage tanks used to store water and petroleum products. Operations conducted within the plant are conducted in the Prep Department, the Fit and Weld Department, and the Paint Shop Department. The facility also houses support departments, described as Administration, Maintenance, Shipping and Receiving, and Warehouse/Storage.

Sheet steel is received by truck and rail in the Prep Department where strip and plate carbon steel and pipe are received and stored. The carbon steel is cut to specification using oxy-fuel burn cutting, wet drill press saws, and plasma cutting techniques. The burned scrap steel generated during cutting is collected in the cutting machine waterbed residue bins. The cut steel is press-formed, fit, and welded in the Fit and Weld Department. The pre-formed parts are fit and welded with steel wire solder the joints and seams. Steel parts are prepared for coating using blasting media to remove any remaining steel mill scale, dust, and grime left from the steel fabrication process. A baghouse collects dust and shot blast particulate. The baghouse dust and particulate are piped to a five-cubic yard roll-off container that is managed as special waste. Primer and paint coatings are applied in the Paint Shop Department inside a large open painting room. Primer paint mixed with zinc is applied to the partially assembled tanks using hand-held mobile paint spray equipment. Primer paint overspray is collected on the floor of the paint booth. The paint booth floor is cleaned monthly. Paint booth filters are changed-out approximately every six months, combined with the floor scrapings, and disposed as a special waste. Waste paint related material is generated from the cleaning of painting equipment using solvent. Waste solvent and waste paint

and paint debris is collected in 55-gallon satellite accumulation area (SAA) containers of HW. Parts are packaged for rail and/or truck shipment and assembly at final customer locations.

4.2 RCRA Status

The facility Notification Acknowledgement/Verification Report identifies the facility as a small quantity generator (SQG) of D001 characteristic and F003 and F005 listed HW (Attachment 6). The facility generates spent fluorescent lamps that are managed as universal waste (UW). The facility also generates used oil resulting from machinery preventive maintenance activities. I determined that the facility generates between 100 and 1000 kg of D001 characteristic F003 and F005 listed HW monthly and inspected CB&I as a SQG of HW, a small quantity handler (SQH) of UW, and a generator of used oil.

4.3 Facility Waste Streams and Management

CB&I receives HW management support from Heritage Environmental Services, Inc. (Heritage), 6510 Telecom Drive, Suite 400, Indianapolis, Indiana. HW shipments are picked up and transported off site by Heritage Transport, LLC (EPA ID# IND058484114). HW shipments were transported to RINECO Chemical Industries, LLC, 819 Vulcan Road, Benton, Arkansas (EPA ID# ARD981057870) for fuel blending.

Mr. Reha stated that CB&I recently recertified waste stream generation with Heritage (Attachment 7). The four waste streams documented by CB&I were UN1263, Waste Paint and Thinner, managed as D001 characteristic and F003 and F005 listed HW; Non-DOT/Non-RCRA Regulated solid material (oil filters); Non-DOT/Non-RCRA oily debris; and Non-DOT/Non-RCRA Regulated liquid (petroleum oil and water). He stated that he is discussing further waste stream profiles with Heritage. Mr. Reha added that the UN1263 paint related waste stream, managed as D001 characteristic and F003 and F005 listed HW, also includes waste cloth shop rags and personal protective equipment (PPE) that have been contaminated with waste paint and thinner.

The following waste streams are managed by CB&I:

Waste solvent/waste paint mixture: Mr. Reha stated that CB&I generates between 400-800 pounds of paint related HW monthly. The solvent and thinner products used by CB&I include Xylol used to thin primer/paint products (Attachment 8); Barsol A-1082 solvent used to flush paint hoses and clean paint guns (Attachment 9); and methyl ethyl ketone (MEK) used sparingly to clean the tips of paint guns (Attachment 10). The coating products used by CB&I include hydro-zinc greenish gray (primer) (Attachment 11); Pota-Pox Plus Tnemec White (Part A-Epoxy) (Attachment 12); and Pota-Pox Plus (Part B-Epoxy) (Attachment 13). Waste solvent/waste paint is generated in the paint booth during painting operations. Waste solvent/waste paint is collected in five-gallon containers that are immediately transported to two 55-gallon drums located outside the paint booth. One of the drums is intended for waste solvent and the other is intended for waste paint; however, both drums are managed as D001 characteristic and F003 and F005 listed HW, based upon product and process knowledge. The

55-gallon drums are picked up and transported off-site by Heritage to the WRR facility for fuel blending.

Waste Cloth Shop Rags: Mr. Reha stated that CB&I generates approximately two waste cloth shop rags weekly in the paint booth. The waste cloth shop rags are used for cleaning machinery and painting equipment. Mr. Reha stated that CB&I manages the waste cloth shop rags as D001 characteristic and F003 and F005 listed HW, based upon product and process knowledge. The waste cloth shop rags are collected in a five-gallon metal step canister located inside the paint booth. The contents of the five-gallon metal step canister are transported from the paint booth and combined with the contents of 55-gallon HW container described above used to collect HW paint located outside the paint booth. The 55-gallon drums of HW are picked up and transported off-site by Heritage to the WRR facility for fuel blending.

Mr. Reha added that cloth shop rags are also used by machinery operators to clean dirt, grime, and lubricating oil from the surface of machinery. Mr. Reha estimated that CB&I generates approximately 10 soiled cloth shop rags weekly. These soiled cloth shop rags have been determined to be non-RCRA hazardous, by virtue of product and process knowledge. The soiled cloth shop rags are collected in five-gallon metal step canisters located outside the paint booth. The soiled cloth shop rags are picked up and transported to the maintenance shop where they are combined with used oil filters stored inside a 55-gallon drum. The waste cloth shop rags are picked up and transported off-site with the used oil filters by Heritage for recycling.

Waste Personal Protective Equipment (PPE) Nitrile Gloves: Mr. Reha stated that CB&I generates approximately two pairs of PPE nitrile gloves weekly in the paint booth. The waste nitrile gloves are worn by painters operating painting equipment inside the paint booth. Mr. Reha stated that CB&I manages the waste PPE as D001 characteristic and F003 and F005 listed HW, based upon product and process knowledge. The waste PPE is collected in a five-gallon metal step canister located inside the paint booth. The contents of the five-gallon metal step canister are transported from the paint booth and combined with the contents of 55-gallon HW container described above used to collect HW paint located outside the paint booth. The 55-gallon drums of HW are picked up and transported off-site by Heritage to the WRR facility for fuel blending.

Waste Dust Collector Fines/Waste Blast Media: Mr. Reha stated that CB&I generates dust collector fines and blast media from various manufacturing processes undertaken to manufacture metal tank products and prepare the products for painting. Mr. Reha stated that all steel used in the plant is produced domestically, based upon customer specifications. He stated that the blasting media used is steel shot and grit. He stated that the waste dust collector fines and waste blast media waste stream has been determined to be non-RCRA hazardous by virtue of product and process knowledge. CB&I has a Special Waste Authorization (77-SWA-32-04) issued by the Iowa Department of Natural Resources (IDNR) that permits the disposal of approximately 125,000 pounds of dust collector fines/blast grit per quarter at the Metro Park East Landfill, #77-SDP-01-72, located in Mitchellville, Iowa, through September 20, 2022 (Attachment 14).

Waste Water Bed/Burning Bed Sludge: Mr. Reha stated that CB&I generates sludge and metal particulate during metal cutting operations. The cutting involves sophisticated laser and

plasma cutting techniques and machinery that collect cut steel particles in a water bed for cooling. Mr. Reha stated that all steel used in the plant is produced domestically, based upon customer specifications. He stated that the waste water bed/burning bed sludge and particulate is residue created when molten steel hits cooler water during the cutting process. He stated that the waste water bed/burning bed sludge waste stream has been determined to be non-RCRA hazardous by virtue of product and process knowledge. CB&I has a Special Waste Authorization (77-SWA-33-04) issued by the Iowa Department of Natural Resources (IDNR) that permits the disposal of approximately 228,000 pounds of waste water bed/burning bed sludge per quarter at the Metro Park East Landfill, #77-SDP-01-72, located in Mitchellville, Iowa, through September 20, 2022 (Attachment 15).

Waste Paint Overspray (Floor Scrapings): Mr. Reha stated that CB&I generates waste paint overspray during painting operations. Mr. Reha stated that the waste paint overspray is collected on the floor of the paint booth and on materials used to mask the paint during painting operations. He stated that the waste paint overspray waste stream has been determined to be non-RCRA hazardous by virtue of product and process knowledge. CB&I has a Special Waste Authorization (77-SWA-34-04) issued by the Iowa Department of Natural Resources (IDNR) that permits the disposal of approximately 22,500 pounds of waste paint overspray per quarter at the Metro Park East Landfill, #77-SDP-01-72, located in Mitchellville, Iowa, through September 20, 2022 (Attachment 16).

Waste Paint Booth Filters: Mr. Reha stated that CB&I generates approximately 1,000 pounds of waste paint booth filters annually. He stated that the waste paint booth filter waste stream has been determined to be non-RCRA hazardous by virtue of product and process knowledge. The previous RCRA CEI report issued April 6, 2006 documented that that waste paint booth filters were included in the Special Waste Authorization 77-SWA-34-4 as waste paint overspray. The waste paint booth filters are disposed in the general trash.

General Trash: Mr. Reha stated that CB&I generates approximately two 20-cubic yard roll-off containers of general trash and one 20-cubic yard roll-off container of special waste weekly. The general trash consists of waste office paper, lunch wastes, and miscellaneous cardboard and packing materials. Mr. Reha stated that the general trash has been determined to be non-RCRA hazardous, by virtue of product and process knowledge. The general trash is picked up weekly by Waste Connections of Iowa, Inc. (Waste Connections), 4705 NE 22nd Street, Des Moines, Iowa and transported off-site to the Metro Park East Landfill, Mitchellville, Iowa, for sanitary landfill disposal.

Waste Parts Washer Solvent: Mr. Reha stated that CB&I operates a parts washer in the Maintenance Shop. The parts washer uses Safety-Kleen Premium Solvent, described in the attached safety data sheet (SDS) (Attachment 17). The waste parts washer solvent has been determined to be non-RCRA hazardous, by virtue of product and process knowledge. The parts washer is maintained by Safety-Kleen and approximately 30 gallons of waste parts washer solvent is generated every three months. The waste solvent is removed from the parts washer, new solvent is placed into the parts washer, and the waste parts washer solvent is transported off-site by Safety-Kleen.

Scrap Metal: Mr. Reha stated that CB&I generates approximately 15 tons of scrap metal monthly. The scrap metal has been determined to be non-RCRA hazardous, by virtue of product and process knowledge. The scrap metal is collected in small three-cubic yard roll-off containers located throughout the plant. The scrap metal is consolidated in large 20-cubic yard roll-off containers, picked up, and transported off-site by Alter Metal Recycling-Des Moines, 1810 Hull Avenue, Des Moines, Iowa, for recycling.

Waste Aerosol Cans: Mr. Reha stated that CB&I generates approximately six RCRA-empty waste aerosol cans monthly. The waste aerosol cans include waste spray paint cans, lubricants, glass cleaner, and similar cleaning products. The empty waste aerosol cans are collected in a flammable cabinet located inside the Maintenance Shop and are then punctured using an aerosol can puncture system that is affixed atop a 55-gallon drum. The punctured cans have been determined to be non-RCRA hazardous and are recycled as scrap metal. The liquid collected inside the 55-gallon drum is managed as D001 characteristic HW. Mr. Reha stated that the 55-gallon drum used to collect the contents of the punctured aerosol cans has not been emptied for at least four years.

Used Oil: Mr. Reha stated that CB&I generates approximately 75 gallons of used oil monthly from facility equipment preventive maintenance activities. The used oil is collected in five-gallon containers and transported to a 250-gallon tank located outside the facility. Mr. Reha stated that CB&I currently pumps the used oil out of the 250-gallon tank into 55-gallon drums that are picked up and transported off-site by Jebro, 2303 Bridgeport Road, Sioux City, Iowa, for recycling.

Used Oil Filters: Mr. Reha stated CB&I generates approximately 10 used oil filters annually from facility equipment preventive maintenance activities. The used oil filters are “hot-drained” in the Maintenance Shop and placed into a 55-gallon drum located inside the Maintenance Shop. The used oil filters are picked up and transported off-site by Heritage for recycling.

Waste Floor Dry/Absorbent Pads: Mr. Reha stated that CB&I generates approximately 15 pounds of waste floor dry and absorbent pads used to absorb used oil leaking onto the plant floors from manufacturing equipment. The waste floor dry/absorbent pads are collected in a 55-gallon drum located inside the Maintenance Shop. The waste floor dry/absorbent pads are picked up and transported off-site by Heritage for recycling.

Waste Fluorescent Lamps: Mr. Reha stated that CB&I generates approximately five spent eight-foot and four-foot fluorescent lamps monthly. The spent fluorescent lamps are managed as universal waste (UW) and stored in cardboard containers located in the Maintenance Shop. The waste fluorescent lamps are picked up and transported off-site by A-TEC Recycling, Inc. (A-TEC), 5754 NE 17th Street, Des Moines, Iowa, for recycling.

Spent Lead-Acid Batteries: Mr. Reha stated that CB&I generates one-to-three spent lead acid batteries annually during the conduct of forklift maintenance activities. He stated that

waste lead-acid batteries are episodically generated on-site and are exchanged for new batteries at Interstate All Battery Center, 1090 73rd Street, Des Moines, Iowa. Based upon Mr. Reha's description of these transactions, the lead-acid batteries generated within the facility are being exchanged in accordance with the provisions of the 40 CFR §266, Subpart G exemption.

4.4 Visual Inspection of Facility Waste Stream Management

A visual inspection of the facility was conducted to observe waste stream management practices and document regulatory compliance. Photographs, checklists, and field notes were used to document observations made during the visual inspection. A Photo Log was created, and photos taken during the inspection appear in Attachment 22.

I observed an aerosol can puncture system located inside the Maintenance Shop (Photo 1, Attachment 2). Aerosol cans staged for puncturing were placed in a small Flammable Cabinet located adjacent to the aerosol can puncture system (Photos 2 and 3, Attachment 2).

I observed a parts washer located inside the Maintenance Shop (Photos 4 and 5, Attachment 2).

I observed four cardboard containers of spent lamps located in the Maintenance Shop area (Photo 6). Two of the smaller cardboard containers were filled with spent Halide and/or sodium lamps. One eight-foot cardboard container was filled with 35-40 spent fluorescent lamps. A label was affixed to the outside of the eight-foot cardboard container, indicating that accumulation of the spent eight-foot lamps started on or about "8/1/19" as shown in Photo 7, Attachment 2). One four-foot cardboard container was filled with approximately 58 spent four-foot fluorescent lamps, some of which had "GREEN TIPS" indicating reduced mercury content. A label was affixed to the outside of the four-foot cardboard container, indicating that accumulation of the spent four-foot fluorescent lamps started on or about "5/30/12" as shown in Photo 8, Attachment 2. Mr. Reha confirmed that accumulation of the waste fluorescent lamps was accurately documented by the labels affixed to the cardboard containers. Therefore, I concluded that the spent lamps had been accumulated by CB&I for longer than one year. **CB&I was accumulating universal waste (UW) lamps for longer than one year, which is inconsistent with the provisions of 40 CFR §273.15(a), NOPF No. 2, Attachment 5.**

I observed several general trash roll-off containers located throughout the facility, similar to the container shown in Photo 9, Attachment 2.

I observed a scrap metal roll-off bin designated for metal shavings (Photo 10, Attachment 2). I also observed a scrap metal roll-off bin designated for larger metal pieces (Photo 11, Attachment 2). I observed a larger scrap metal roll-off bin positioned adjacent to a plasma cutting machine as shown in Photo 12, Attachment 2.) I observed a water bed of burning bed metal fines (sludge) shown in Photo 13, Attachment 2.

I observed a large abrasive blasting room, located near the painting room (Photo 14, Attachment 2). I observed a collection unit for blasting unit fines (Photo 15, Attachment 2) and a 55-gallon filled with blasting media (Photo 16, Attachment 2).

I observed the large paint room, Attachment 2. I observed two 55-gallon drums located outside the paint room. One of the drums was designated as a HW satellite accumulation area (SAA) container of waste solvent managed as D001 characteristic and F003 and F005 listed HW, as shown in photos 17-19, Attachment 2). The 55-gallon container of HW was closed, labeled as “Hazardous Waste”, and described the nature of the drum’s contents. The 55-gallon drum was approximately 2/3-full. Mr. Reha stated that it was CB&I’s practice to annotate the HW accumulation start date as the date HW was first placed into the container. The HW label indicated the start date as “4/2/22” and appears to be consistent with HW shipping documentation discussed in Section 4.5 below. The second drum was designated in another HW SAA as waste paint, managed as D001 characteristic and F003 and F005 listed HW, as shown in Photo 20, Attachment 2. The 55-gallon drum was approximately 2/3-full, closed, appropriately labeled, and was at or near the point of HW generation. Mr. Reha explained that when the containers are full, they are moved from their present location to a HW central accumulation area (HWCAA) located nearby. He stated that HW is routinely picked up monthly by Heritage and averages between two to three 55-gallon drums for each shipment. At the time of this inspection, there were no containers of HW stored in the HWCAA. However, I observed a spill kit located adjacent to a spill pallet designated as the staging point of full containers of HW (Photo 21, Attachment 2).

I observed a 1/2-full five-gallon metal step canister of soiled cloth shop rags located inside the paint room (Photos 22 and 23, Attachment 2). Mr. Reha stated that the soiled cloth shop rags were managed as D001 characteristic and F003 and F005 listed HW. The “Hazardous Waste” label affixed to the five-gallon step canister of soiled shop rags was barely legible, covered by significant layers of paint overspray. Mr. Reha stated that the soiled cloth shop rags are removed from the metal step can and combined with the contents of the HW waste paint SAA previously discussed. Mr. Reha and I discussed labeling of the container and he stated that he will prepare a new “Hazardous Waste” label for the container.

I observed the exterior of the dust collection baghouse unit located on the southern end of the facility (Photo 24, Attachment 2). I observed a plastic-lined roll-off container of baghouse fines located inside the enclosure.

I observed a 250-gallon tank designated for Used Oil, located on the east side of the facility (Photo 25, Attachment 2). The tank was labeled with the words “Used Oil” and appeared to be in good condition.

I observed a large covered general trash roll-off bin containing special waste located outside the facility (Photo 26, Attachment 2).

No environmental issues or areas of concern were observed during this visual examination.

4.5 Documentation

Prior to this CEI, I reviewed 29 electronic uniform hazardous waste manifests (UHWM) for HW generated by this facility, spanning the period of February 11, 2019, to present, shown

below:

UHWM#	DATE	Description	QTY	UNIT	Waste Codes
000950962WAS	2/11/2019	UN1263 Waste Paint	3	DM	D001, F003, F005
000962048WAS	3/13/2019	UN1263 Waste Paint	2	DM	D001, F003, F005
000952122WAS	4/10/2019	UN1263 Waste Paint	3	DM	D001, F003, F005
000963920WAS	5/20/2019	UN1263 Waste Paint	3	DM	D001, F003, F005
000963759WAS	6/24/2019	UN1263 Waste Paint	3	DM	D001, F003, F005
000963600WAS	7/23/2019	UN1263 Waste Paint	3	DM	D001, F003, F005
000962698WAS	8/21/2019	UN1263 Waste Paint	3	DM	D001, F003, F005
000962813WAS	9/18/2019	UN1263 Waste Paint	3	DM	D001, F003, F005
000962927WAS	10/15/2019	UN1263 Waste Paint	2	DM	D001, F003, F005
000950871WAS	11/11/2019	UN1263 Waste Paint	3	DM	D001, F003, F005
000950777WAS	12/11/2019	UN1263 Waste Paint	2	DM	D001, F003, F005
000950655WAS	1/13/2020	UN1263 Waste Paint	2	DM	D001, F003, F005
014092475FLE	2/2/2020	UN1263 Waste Paint	2	DM	D001, F003, F005
001012288WAS	3/9/2020	UN1263 Waste Paint	2	DM	D001, F003, F005
000963432WAS	4/14/2020	UN1263 Waste Paint	2	DM	D001, F003, F005
000963331WAS	5/11/2020	UN1263 Waste Paint	2	DM	D001, F003, F005
000963139WAS	7/1/2020	UN1263 Waste Paint	3	DM	D001, F003, F005
001084490WAS	8/4/2020	UN1263 Waste Paint	2	DM	D001, F003, F005
001084063WAS	9/30/2020	UN1263 Waste Paint	3	DM	D001, F003, F005
001080345WAS	10/28/2020	UN1263 Waste Paint	3	DM	D001, F003, F005
001080261WAS	11/23/2020	UN1263 Waste Paint	2	DM	D001, F003, F005
001080046WAS	12/21/2020	UN1263 Waste Paint	2	DM	D001, F003, F005
001140708WAS	1/19/2021	UN1263 Waste Paint	2	DM	D001, F003, F005
001149117WAS	3/1/2021	UN1263 Waste Paint	2	DM	D001, F003, F005
001082592WAS	4/14/2021	UN1263 Waste Paint	2	DM	D001, F003, F005
001012137WAS	5/12/2021	UN1263 Waste Paint	3	DM	D001, F003, F005
001176967WAS	7/6/2021	UN1263 Waste Paint	3	DM	D001, F003, F005
001176762WAS	8/4/2021	UN1263 Waste Paint	2	DM	D001, F003, F005
001172222WAS	1/20/2022	UN1263 Waste Paint	2	DM	D001, F003, F005

In addition, I reviewed one UHWM #001244579WAS dated 4/4/2022, documenting the shipment of three drums of UN1263, Waste Paint, Waste Codes D001, F003, and F005 (Attachment 18). I have also attached a summary report received by Mr. Reha from Heritage documenting HW shipments starting April 10, 2019 to present (Attachment 19).

I did not observe any discrepancies with the shipping documentation/manifests maintained by the facility.

4.6 Preparedness/Prevention and Training

Mr. Reha is designated as the emergency coordinator for CB&I. Emergency contact information was posted throughout the facility. One posting identifies various Facility Emergency Contacts (Attachment 20) and another posting identifies hazardous substance contact information posted near the telephone in accordance with 40 CFR §262.16(b)(9)(ii). Mr. Reha explained that CB&I has made arrangements with local emergency agencies. He added that responding agencies have been familiarized with the layout of the facility, are aware of the types of HW generated/stored on site, likely casualty types, HW access points, and emergency evacuation routes. Mr. Reha has also familiarized all employees with waste handling and emergency procedures commensurate with their responsibilities.

4.7 Renotification

I asked Mr. Reha if CB&I had renotified the EPA of hazardous waste activity, required of a SQG of HW, every four years, starting September 1, 2021. Mr. Reha responded that he was not aware of the requirement and had not renotified the EPA as required. **CB&I must renotify the EPA of hazardous waste activity every four years, commencing September 1, 2021 in accordance with CFR 40 §262.18(d)(1), NOPF No. 1, Attachment 5.**

5.0 SUMMARY

The following findings were documented during the RCRA CEI conducted on April 6, 2006:

NOPF No. 1: 40 CFR §262.11: Failure to make an adequate HW determination (RESCINDED).

NOPF No. 2: 40 CFR §262.34(c)(1)(a)(i): Failure to keep satellite accumulation container closed.

NOPF No. 3: 40 CFR §262.31: Failure to label container per DOT (RESCINDED)

NOPF No. 4: 40 CFR §265.174: Failure to inspect or document weekly inspections (RESCINDED)

NOPF No. 5: 40 CFR §273.13(a)(1) & §273(c)(1): Failure to mark containers of universal waste w/date of accumulation and keep containers closed.

I documented the following preliminary findings during this CEI:

NOPF No. 1: 40 CFR §262.18(d)(1): Renotify EPA of hazardous waste activity every four years, beginning September 1, 2021.

NOPF No. 2: 40 CFR §273.15(a): Accumulated universal waste (UW) for longer than one year.

Other than the items specifically noted in this narrative, I observed no additional issues or potential findings. However, further EPA review may change or add to my findings.

HURLEY BRYANT
(Affiliate)

Digitally signed by HURLEY
BRYANT (Affiliate)
Date: 2022.06.13 19:11:20 -05'00'

Date: 5/6/2022

H. D. "Doug" Bryant, CPP, PCI
Civil Investigator, NOWCC/SEE

AMBER WHISNANT

Digitally signed by AMBER
WHISNANT
Date: 2022.06.11 16:58:55 -05'00'

Date: _____

Amber Whisnant
Chief, RCRA Section, Chemical Branch
Enforcement and Compliance Assurance Division

Attachments:

- 1) Business Card (1 page)
- 2) Site Map/Diagram (2 pages)
- 3) Confidentiality Notice (1 page)
- 4) Receipt of Document and Samples (1 page)
- 5) Notice of Preliminary Findings (1 page)
- 6) Notification Acknowledgement/Verification Report (1 page)
- 7) Wastestream Recertification, CB&I and Heritage Environmental Services, dated March 3, 2022 (2 pages).
- 8) Safety Data Sheet (SDS) Xylol (10 pages)
- 9) SDS, Barsol A-1082 (10 pages)
- 10) SDS, Methyl Ethyl Ketone (MEK) (10 pages)
- 11) SDS, Hydro-Zinc Greenish Gray (11 pages)
- 12) SDS, Pota-Pox Plus Tnemec White Series N140F/V140F, Part A (12 pages)
- 13) SDS, Pota-Pox Plus Series N140/N140F, Part B (11 pages)
- 14) Iowa Department of Natural Resources (IDNR) Special Waste Authorization (SWA) 77-SWA-32-04 (1 page)
- 15) Iowa Department of Natural Resources (IDNR) Special Waste Authorization (SWA) 77-SWA-33-04 (1 page)
- 16) Iowa Department of Natural Resources (IDNR) Special Waste Authorization (SWA) 77-SWA-34-04 (1 page)
- 17) SDS, Safety-Kleen Premium Solvent (16 pages)
- 18) Uniform Hazardous Waste Manifest (UHWM) #001244579WAS, dated 4/4/2022 (4 pages)
- 19) Heritage Manifest Summary Report (5 pages)
- 20) CB&I Clive Facility Emergency Contacts (1 page)
- 21) CB&I Hazardous Substances Emergency Information (1 page)
- 22) Photo log (2 pages) and Photos (26 pages)