

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

Iowa Mold Tooling Company Inc.

500 HWY 18 W
Garner, IA 50438
(641) 923-8033

EPA ID Number: IAD005286539

On

June 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 Iowa Mold Tooling Company Inc. (IMT) in Garner, Iowa on June 23, 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

Iowa Mold Tooling Company Inc.:

Jim Homann, Safety & Environmental Manager

Scott Etter, Health & Safety

Jim Hasty, Vice President and General Manager

Nick Studer, Operations Manager

Ben Ebeling, Maintenance Supervisor

Scott Obremski, Senior Corporate Environmental Manager

Matthew Gregory, Safety & Environmental Manager
Amy Doran, Lead Assembler
Mitch Johnson, Assembly Supervisor
Steve Downs, Paint Supervisor
Chase Reding, Paint Supervisor

EPA Representative, ERG:
Janosh Wolters, Energy Engineer

3.0 INSPECTION PRECEDURES

Due to the COVID-19 pandemic, I contacted the facility via telephone and left a voicemail with Mr. Gregory. I was unable to reach Mr. Gregory. I called IMT customer service and was re-routed to Mr. Homann one day 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 IMT at approximately 07:35, I performed a drive-by of the facility and took a photograph before beginning the inspection and did not note any areas of concern. I then entered the main entrance and signed into the visitor's log. Mr. Homann instructed me to watch the facility's safety video before guiding me to a conference room. Mr. Etter, Mr. Hasty, Mr. Studer, Mr. Ebeling were all present in the conference room. Mr. Homann stated Mr. Gregory would like to join the opening conference via telephone. Mr. Homann set up a conference call and Mr. Gregory introduced himself. I then introduced myself to Messrs. Homann, Gregory, Etter, Hasty, Studer, and Ebeling and initiated the opening conference. 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 them with a copy of Title 18 U.S. Code, Sections 1001 and 1002. I then presented Mr. Homann with a copy of the *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections* and reviewed IMT's confidentiality rights. All IMT representatives were given the opportunity to read and review all documents discussed in the opening conference. I informed Messrs. Homann, Gregory, Etter, Hasty, Studer, and Ebeling that I would provide a *Confidentiality Notice* at the end of this inspection. Mr. Homann stated that himself, Mr. Studer, and Mr. Etter would accompany me throughout the duration of the inspection and area specific personnel will join us, as needed.

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. Homann provided a facility layout (see Attachment 1) and explained facility operations and locations of hazardous waste generation and management.

During the visual inspection of the facility, Mr. Studer guided Messrs. Homann and Etter and me throughout the facility in order to conduct thorough evaluations of the facility's satellite accumulation areas (SAAs) and central accumulation areas (CAAs). At the time of the inspection, the facility was operating seventeen SAAs and two CAAs. The facility also handles universal waste in a designated on-site area, which was also visually inspected. I conducted an in-depth visual inspection of the seventeen SAAs, the CAAs, the universal waste area, the used

oil storage area, and all manufacturing areas.

Six 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. Etter 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). In addition to the personnel present at the opening conference, Mr. Johnson, Mr. Downs, Mr. Reding joined for the closing conference. Also, Mr. Obremski joined the closing conference via telephone along with Mr. Gregory. No confidentiality claims were made by IMT.

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

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

IMT began operating in 1961 and currently employs approximately 280 people. The facility operates Monday through Friday, 08:00-16:30 for office staff. The production staff works 06:00-16:30, Monday through Thursday. The facility has a footprint of approximately 325,000 square feet under roof and owns a total of 26 acres. IMT operations consist of manufacturing mechanic

service truck bodies and cranes. The major raw materials used are steel, paint, and solvents. The major manufacturing or processing operations that generates waste streams include the painting, coating, and assembly of mechanic truck bodies and cranes. The following waste streams are produced: multispec coating, solvent soaked rags, aerosol can residuals, bedliner waste, paint booth filters, wastewater, wastewater sludge, scrap metal, universal wastes, used oil, and general trash.

4.2 RCRA Status

According to the *Hazardous Waste Site Info Verification Report for Inspector* (see Attachment 8), IMT notified as a federal LQG of D001, D035, D039, F002, F003, and F005 hazardous wastes. I asked Mr. Homann to review the *Hazardous Waste Site Info Verification Report for Inspector*, which I provided prior to records review and visual inspection of the waste generation areas. He requested a change of the facility contact information and phone number of the site. After reviewing the records and walking through the facility, I determined that the facility is operating as a LQG of D001, D035, F003, and F005 hazardous wastes, a generator of used oil, and a SQH of universal waste. IMT generates more than 1,000 kilograms of hazardous waste monthly based on a review of facility records, a visual inspection of process and waste management areas, and interviewing personnel.

IMT was previously inspected by an EPA contractor on May 19, 2017. The inspection led to a notice of preliminary findings (NOPFs). The findings included failure to conduct weekly inspections of a hazardous waste container accumulation area, failure to include hazardous waste-related duties in written job descriptions, failure to have written description of type and amount of introductory and continuing hazardous waste training provided, failure to provide training to all personnel who manage hazardous waste, failure to include evacuation routs in contingency plan, and failure to make an adequate hazardous waste determination on waste multispec. IMT responded by correcting issues that led to the findings as shown through documentation provided by the facility, and no enforcement actions were taken.

4.3 Facility Waste Streams and Management

A Waste Stream and Waste Handling Table for IMT 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 Multispec Coating (Waste Profile included in Attachment 9)	Coating various metal surfaces for final manufacturing of mechanic service truck bodies	D001, D035, F003, F005 (based on process knowledge and knowledge of the product)	5,000 to 6,000 pounds per month	55-gallon container in SAA and transferred to CAA	Heritage Transport LLC in Indianapolis, IN (IND058484114) to Rinco in Benton, AR (ARD981057870)
2	Solvent-Soaked Rags (Waste Profile included in Attachment 10)	Soak them in solvent for degreasing surfaces in preparation for paint and cleaning operations	D001, F003, F005 (based on process knowledge and knowledge of the product)	1,000 pounds per month	5-gallon containers, and 55-gallon containers in SAAs transferred to CAA	Heritage Transport LLC in Indianapolis, IN (IND058484114) to Rinco in Benton, AR (ARD981057870)
3	Aerosol Can Residuals	Puncturing aerosol cans	D001 (based on process knowledge and knowledge of the product).	One 55-gallon container per year	55-gallon container in SAA	Heritage Transport LLC in Indianapolis, IN (IND058484114) to Rinco in Benton, AR (ARD981057870)
4	Bedliner Mix Waste	Excess from mixing two component product together	Nonhazardous (based on process knowledge and knowledge of the product)	Less than one 55-gallon container every four months	55-gallon container	Heritage Transport LLC in Indianapolis, IN (IND058484114) to Rinco in Benton, AR (ARD981057870)

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
5	Paint Booth Filters	Painting operations	Nonhazardous (based on process knowledge and knowledge of the product)	One 20-yard roll-off container per every two months	Accumulated in 20-yard roll-off container	REPACC, LLC in Keokuk, IA
6	Wastewater	Washing operations from paint line	Nonhazardous (based on process knowledge and knowledge of the product)	20,000 gallons per month	100-gallon sumps that are sent to WWTP on site for pretreatment prior to sanitary discharge	Discharged to City of Garner POTW
7	Wastewater Treatment Sludge (TCLP results included in Attachment 11)	WWTP	Nonhazardous (based on process knowledge and testing)	660 pounds per month	55-gallon containers	Hauled to Landfill of North Iowa in Cerro Gordo County, IA
8	Scrap Metal/Shot Dust	Cutting operations, punctured aerosol cans, shot dust	Nonhazardous (based on process knowledge and knowledge of the product)	Unknown – not tracked	Various sized roll off containers ranging from three 10 cubic-yard roll offs and one flatbed trailer	McNeilus Steel Inc. in Dodge Center, MN (MND022760326)

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
9	Used Oil	Facility maintenance	Nonhazardous (managed as used oil per 40 CFR 279)	One 55-gallon container per month	55-gallon container	Safety-Kleen in Des Moines, IA (IAD981718000)
10	Used Oil Filters	Maintenance of facility equipment (punctured and hot drained)	Nonhazardous (based on process knowledge and knowledge of the product)	One 55-gallon drum every year	55-gallon container	Safety-Kleen in Des Moines, IA (IAD981718000)
11	Universal Waste Lamps	Facility maintenance	Nonhazardous (managed as universal waste)	One 4-foot container per year	4-foot-tall cardboard container	The Retrofit Companies in Owatonna, MN
12	Universal Waste Batteries	Facility maintenance	Nonhazardous (managed as universal waste)	Ten 5-gallon containers per year	5-gallon containers	The Retrofit Companies in Owatonna, MN

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
13	Truck Wash Bay Solids	Washing trucks	Nonhazardous (based on process knowledge and knowledge of the product)	6,000 – 12,000 pounds per month	100-to-250-gallon sumps that are sent to W/OTP for pretreatment are serviced for solids build up as needed	Hydro-Kleen LLC in Des Moines, IA
14	General Trash	Facility operations	Nonhazardous (based on process knowledge and knowledge of the product)	40-cubic yard trash compactor picked up weekly	40-cubic yard trash compactor	Absolute Waste Removal in Ankeny, IA to North Iowa Landfill in Cerro Gordo County, IA

4.4 Less-Than-90-Day Hazardous Waste Accumulation Area

IMT has two Less-Than-90-Day CAAs on site. The facility uses a primary CAA to accumulate most of the facility's waste. This CAA is referred to as the "Hazardous Waste Storage Area." It is located on the western portion of the facility in the Northwest Warehouse. The facility also operates one CAA that is one 55-gallon container used to accumulate all solvent-soaked hazardous waste rags from SAAs throughout the facility. It is located next to the assembly line as shown on the facility layout (see Attachment 1). I visually inspected both CAAs. The Hazardous Waste Storage area contained a total of 10 hazardous waste containers. All containers were 55-gallon drums. Six of the containers were holding multispec waste and four were holding solvent-soaked hazardous waste rags. During records review, I asked Mr. Homann what type of solvent is used on the rags. Mr. Homann explained the facility uses a solvent mixture that the rag is completely soaked in before using it to clean and wipe off manufactured parts. The safety data sheet (SDS) for the solvent mixture is provided in Attachment 12. The waste profile for the solvent-soaked hazardous waste rags is provided in Attachment 10. I also observed two 55-gallon containers labeled as Hazardous Secondary Material (HSM) waiting to be reclaimed off site. I asked Mr. Homann if IMT has notified EPA for handling HSM. Mr. Homann stated the facility sent a one-time notification using EPA Form 8700-12 in order to notify EPA of IMT's HSM handling and to exercise the exclusion set forth in 40 CFR 271.4(a)(24). Mr. Homann stated IMT has re-notified for their continued handling of HSM as part of the facility's biennial report. The renotification as part of IMT's 2019 biennial report is provided in Attachment 13. The earliest accumulation start date I observed was on a container of hazardous waste rags. The accumulation start date was May 5, 2021. May 5, 2021 is within 90 days from the time of the inspection.

The CAA located next to the assembly line contained one 55-gallon container, accumulating hazardous waste rags. The 55-gallon container is attached to a compactor that compacts the hazardous waste rags as part of the facility's waste minimization plan. The 55-gallon container was labeled with an accumulation start date of June 10, 2021 (see Attachment 3, Photos 2 and 3).

Both Less-Than-90-Day CAA containers were in good condition, closed, labeled with the indication of the nature of the hazard, and labeled with the words "Hazardous Waste". I observed adequate aisle space to allow for container inspections and access in the event of a spill. In addition, the facility has a labeling station that is equipped with spare hazardous waste labels, indication of hazard stickers, and writing utensils. I observed a fire extinguisher, fire suppression system, spill control equipment, and related safety equipment within the CAA. Operators handling hazardous waste carry radios while on site, which serve as a communication system in case of emergencies. A sign was posted next to the CAA which listed the various radio communication channels used at the site. I asked Mr. Homann if the facility inspected the CAAs. Mr. Homann stated the facility inspected the CAAs and had weekly inspection logs. During records review, Mr. Homann provided inspection logs for the CAA. The inspection log for the Hazardous Waste Storage Area CAA is provided in Attachment 14. The CAA log that is part of the facility's layered process audit is provided in Attachment 15. I reviewed the logs and determined the facility was adequately performing weekly inspections of the CAA (Hazardous Waste Storage Area) located in the Northwestern Warehouse. For the CAA located next to the assembly line, the facility conducted a weekly inspection. However, it was part of the facility

Layered Process Audit. Mr. Studer explained this is primarily done for internal quality control checks. The layered process audit inspects multiple areas including the CAA located next to the assembly line. 40 CFR 262.17(a)(v) states “At least weekly, the large quantity generator must inspect central accumulation areas. The large quantity generator must look for leaking containers and for deterioration of containers caused by corrosion or other factors.” The inspection log provided in Attachment 14; clearly shows the criteria the CAA is being inspected for. The inspection used as part of the layered process audit does not properly identify if the CAA is being inspected for leaking containers or the condition of the containers. It does include to ensure the container in the CAA is closed. I concluded the facility was not inspecting the CAA located next to the assembly line per the requirements set forth in 40 CFR 262.17(a)(1)(v). Therefore, I left a finding for failing to conduct weekly inspections of a CAA.

NOPF 3 – Failure to inspect CAA weekly [40 CFR 262.17(a)(1)(v)].

I did not note any additional issues or findings at the CAAs during the inspection.

4.5 Satellite Accumulation Areas

I observed seventeen satellite areas at IMT 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	Crane and Small Part Painting Operation Paint Mix Room	Hazardous Waste Rags	5 gallons	10-gallon container
2	Crane and Small Part Painting Operation	Hazardous Waste Rags	5 gallons	10-gallon container
3	Truck Liner Paint Booth	Hazardous Waste Rags	5 gallons	10-gallon container
4	Truck Liner Paint Booth	Hazardous Waste Rags	5 gallons	10-gallon container
5	Truck Liner Paint Mix Room	Multispec Waste	30 gallons	55-gallon container
6	Truck Liner Paint Mix Room	Hazardous Waste Rags	5 gallons	10-gallon container
7	Paint Booth 4	Hazardous Waste Rags	5 gallons	10-gallon container
8	Paint Booth3	Hazardous Waste Rags	5 gallons	10-gallon container
9	Topcoat Paint Booth	Hazardous Waste Rags	5 gallons	10-gallon container

10	Assembly Operations	Hazardous Waste Rags	5 gallons	10-gallon container
11	Assembly Operations	Hazardous Waste Rags	5 gallons	10-gallon container
12	Assembly Operations	Hazardous Waste Rags	5 gallons	10-gallon container
13	Assembly Operations	Hazardous Waste Rags	5 gallons	10-gallon container
14	Assembly Operations	Hazardous Waste Rags	5 gallons	10-gallon container
15	Assembly Operations	Hazardous Waste Rags	5 gallons	10-gallon container
16	Assembly Operations	Hazardous Waste Rags	5 gallons	10-gallon container
17	Assembly Operations	Hazardous Waste Rags	5 gallons	10-gallon container

All hazardous waste accumulation containers observed in the SAAs were in good condition, closed, labeled with the indication of the nature of the hazard, and labeled with the words “Hazardous Waste” except for containers located in SAAs 10, 12, and 16. The containers located in these SAAs were not labeled with the words “Hazardous Waste” and were not labeled with an indication of the nature of the hazard. During the visual inspection, I observed an unlabeled 10-gallon container in SAA 10 and asked Mr. Homann why the container was not labeled (see Attachment 3, Photo 4). Mr. Homann stated this must have been an oversight and was a mistake. Mr. Homann asked if he could fix the container immediately to ensure the container is back in compliance. I told Mr. Homann I would document the container as I initially observed, but that he could label the container correctly. Mr. Homann called Mr. Johnson, who is the facility’s assembly supervisor and explained the issue with the SAA container. Mr. Johnson then called Ms. Doran, the facility’s lead assembler to correct the issue with the container. Ms. Doran attached a hazardous waste label onto the container which contained the words “Hazardous Waste” and an indication of the nature of the hazard on the label (see Attachment 3, Photo 5). Mr. Homann stated he would ensure the facility removed the "Oily Waste Can” label off the container to avoid any confusion of what is contained inside the waste container. Ms. Doran joined for the remainder of the visual inspection of the assembly area. I observed a 10-gallon container in SAA 12 and 16 that were a repeat issue of the container in SAA 10. With my initial observation, the 10-gallon container in SAA 12 and the 10-gallon container in SAA 16 did not contain the words “Hazardous Waste” and were not labeled with an indication of the nature of the hazard. Upon discovery, Ms. Doran immediately labeled these containers and removed the “Oily Waste Can” label. Therefore, I left a finding for failure to label the SAA container in SAAs 10, 12, and 16 with the words “Hazardous Waste” and an indication of the nature of the hazard.

NOPF 1 – Failure to label SAA container with the words “Hazardous Waste” [40 CFR 262.15(a)(5)(i)].

NOPF 2 – Failure to labeled SAA containers with the indication of the nature of the hazard [40 CFR 262.15(a)(5)(ii)].

I reviewed the management of all SAAs throughout the facility and no additional issues or findings were noted.

4.6 Painting Operations

During the visual inspection, I observed two paint lines. One of the paint lines is dedicated to smaller manufactured truck parts and cranes and is located on the northern part of the facility as shown on the facility layout (see Attachment 1). Before manufactured parts are sent to painting operations, raw materials are cut to client specifications using CNC machines. The machines use a nonhazardous coolant for cutting operations. The coolant SDS is provided in Attachment 16. Mr. Reding explained the manufactured parts run through a five-stage wash before entering the paint line. The wastewater is sent directly to the facility’s wastewater treatment plant (WWTP). From there, the wastewater is discharged to the City of Garner publicly owned treatment works (POTW). I asked Mr. Reding how the WWTP sludge is managed. He asked Mr. Homann to answer the question. Mr. Homann stated the facility accumulated WWTP sludge in 55-gallon containers and that it is a nonhazardous waste. Mr. Homann provided me with most recent toxicity characteristic leaching procedure (TCLP) analysis completed on the WWTP sludge. The TCLP analysis is provided in Attachment 11. As the manufactured parts then enter the paint line, they enter a dryer oven and then into the primer booth. From there, the parts enter another dryer oven, and next into a topcoat booth. Lastly, the parts enter a topcoat booth cure oven before being sent to assembly. The topcoat and primer booth both generate HSM. The HSM is generated by flushing paint guns after painting. The paint guns are flushed into 5-gallon containers, one in each booth. The containers are labeled with the contents and Mr. Chase explained are immediately brought to the 55-gallon container used for accumulating HSM being sent off site for reclamation. I observed the 55-gallon container, and it was labeled as “Hazardous Secondary Material” and had an accumulation start date of “6-17-2021.” The paint booths also use parts washers to wash paint guns and the spent solvent is also added into the 55-gallon container accumulating HSM. I asked Mr. Reding, the facility’s paint supervisor, what type of solvent is used. Before Mr. Reding could respond, Mr. Homann answered the question and stated the facility uses the same solvent mixture throughout all facility operations. The SDS for the solvent mixture is provided in Attachment 12.

I then observed the painting operation located next to the assembly line. This paint line is dedicated to bedliners of trucks. Mr. Homann explained the bedliners are washed with water and the wastewater enters 100-gallon sumps that are gravity drained to a 250-gallon sump that is automatically pumped to the facility’s WWTP. The bedliners then have a multispec coating applied onto the bodies. The multispec coating is comprised of two components that are mixed and immediately applied onto the trucks. If the mixture is done incorrectly, the epoxy can

harden, and it is unusable. Mr. Homann stated this rarely happens and the unusable hardened epoxy is then disposed of as a nonhazardous waste. The waste profile is provided in Attachment 17. However, the waste generated from applying the coating of multispec on the metal surfaces of the mechanic service truck bodies is managed as a hazardous waste. The waste profile is provided in Attachment 9. The bedliners then enter the primer booth and then the topcoat booth. The two paint booths generated HSM when paint guns are flushed with the solvent solution described above. The topcoat booth in operation had a 5-gallon container that is hard piped to a 55-gallon container that is used to accumulate the HSM (see Attachment 3, Photo 6).

I did not observe any issues or findings were noted with the facility's painting operations.

4.7 Assembly Operations

The facility operates an assembly operations area as labeled on the facility layout in Attachment 1. I observed SAAs throughout the assembly operations area as shown in the table in section 4.5 of this report. I observed aerosol cans on workstations. I asked Mr. Homann how aerosol cans are managed. Mr. Homann stated that aerosol cans are used until RCRA empty and collected in 55-gallon drums to be punctured. The containers are punctured in the facility's CAA located in the Northwest Warehouse. I observed the puncturing unit during the visual inspection of the CAA. During records review, I reviewed the aerosol can residuals waste profile. The waste profile showed the waste to be a D001, D039, F002, F003, and F005 hazardous waste. The waste profile is provided in Attachment 18. I also observed this waste stream was being manifested for the waste codes listed in the waste profile. I asked Mr. Homann if the facility dedicated the aerosol can residuals to their own waste stream and the waste stream is not combined with any other waste streams. Mr. Homann stated the facility managed the waste stream as a separate waste stream. I asked Mr. Homann why the facility is managing the aerosol can residuals with F listings. Mr. Homann stated he believes this to be a mistake and explained that he understands how a waste receives an F listing. Mr. Homann stated he understood that because the facility is managing the waste stream alone, it should not contain F listings. In addition, he believed the D039 waste code to be a legacy issue. The facility has changed what type of brake cleaner they use, and it no longer would require the D039 waste code. The new brake cleaner SDS is provided in Attachment 19. It does not contain tetrachloroethylene (D039) and therefore, will be removed from the waste profile, along with the F listings. Mr. Homann stated the facility will begin to manage the aerosol can residuals as only a D001 hazardous waste. An example of the manifest I observed that shows the additional waste codes for the aerosol can residual waste is provided in Attachment 20. Furthermore, several SDSs I reviewed indicated the waste should be managed as a D001 hazardous waste. Based on conversations with Mr. Homann, and the clear indication that he can make proper hazardous waste determinations, I did not leave a finding for over classifying this waste stream.

Aside from the issues discussed in section 4.5 of this report with SAAs 10, 12, and 16; I did not note any issues or findings in the assembly area.

4.8 Universal Waste Accumulation Area

IMT manages universal waste in a designated area next to the maintenance area, as shown on the facility layout (see Attachment 1). At the time of the inspection, one 4-foot cardboard and one 5-gallon container of universal waste lamps were present on site. In addition, three 5-gallon containers of universal waste batteries were on site. Lastly, one 5-gallon container of non-PCB ballasts was present on site. All universal waste containers were labeled as universal waste lamps/batteries/non-PCB ballasts, closed, and dated with the accumulation start date. The earliest accumulation start date observed on the universal waste containers was 10-20-2020, which was present on one of the used batteries containers and is within one year of the inspection date. During records review, Mr. Homann provided me with an example of the universal waste certificate of recycling the facility receives when shipping universal waste off site. The certificate is provided in Attachment 21. I did not note any issues or findings at the universal waste accumulation area.

4.9 Used Oil

I visually observed the facility's used oil in the facility's used oil storage shed located on the eastern portion of the facility as shown on the facility layout (Attachment 1). I observed one 55-gallon container of used oil which was approximately half full. The container was closed, labeled "Used Oil", and in good condition. I did not note any issues or findings at the used oil storage area.

4.10 Other Regulatory Requirements

Preparedness, Prevention, and Emergency Requirements - Safety and emergency equipment were present and in satisfactory condition in areas throughout the facility, including the hazardous waste container CAA (as noted in Section 4.4 of this report). Appropriate arrangements and coordination were made with necessary State and local emergency agencies.

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

Contingency Planning Requirements - The contingency plan (see Attachment 22) was on file electronically and in a binder and was reviewed while on site. The contingency plan had been revised in May 2021, and included emergency evacuation routes, emergency response procedures, emergency coordinators and contact information, and a list of emergency response equipment.

The facility had a quick reference guide prepared (see Attachment 23). The facility had submitted the guide and contingency plan to local emergency response agencies including the local police department, fire department, and hospital. Upon review of the guide, I observed a list and description of hazardous waste with estimated maximum amounts of each waste on site at one time. The guide summarized evacuation and emergency response procedures as well. The guide did not include a map showing where hazardous waste is generated and accumulated on

site. I asked Mr. Homann why the quick reference guide did not include a map showing where hazardous waste is managed and accumulated. Mr. Homann stated the facility must not have recognized to include this information. I explained to Mr. Homann the quick reference guide must include a map that contains the locations where hazardous waste is generated and accumulated. Mr. Homann stated the facility will note the requirement and revise their quick reference guide immediately. At the time of the inspection, the facility did not have this map included in the quick reference guide. Therefore, I left a finding for failure to include a map that contains the locations where hazardous waste is generated and accumulated.

NOPF 4 - Failure to include a map that contains the locations where hazardous waste is generated and accumulated. [40 CFR 262.262(b)(4)].

The plan did include another map showing the facility in relation to surrounding businesses, schools, and residential areas. Lastly, the guide included references to water supply and fire response equipment locations, identification of on-site notification systems or alarms, and the name and telephone number for the emergency contact for the area. I reviewed the entire RCRA contingency plan and no additional findings were noted.

Personnel Training Requirements – Personnel are to be trained to perform hazardous waste duties, and new employees are to be trained within 6 months of start. The training, at a minimum, must be designed to ensure personnel at IMT are able to manage hazardous waste relevant to the positions in which they are employed and respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including:

1. Procedures for using, inspecting, repairing, and replacing facility emergency equipment
2. Communications and alarm systems
3. Response to fires or explosions

Upon reviewing the hazardous waste training employees of IMT receive, I determined the training to be sufficient. I reviewed attendance sheets and all training materials. Training records and signed attendance sheets are included in Attachment 24 as examples.

I reviewed the personnel training requirements, and no other findings were noted.

Manifest and Land Disposal Restriction (LDR) Requirements – IMT maintained records of manifests on site at the time of inspection dating back three years. IMT organized manifests for all hazardous waste shipments separately from the shipments of HSM. Mr. Homann stated this is for internal tracking management. I reviewed all 72 hazardous waste shipment manifests from the last three years. I reviewed 60 of the 180 total HSM manifests from the last three years. The manifest for the May 13, 2021, hazardous waste shipment, as well as the associated LDR form, are included in Attachment 20 as an example. The manifest for the May 14, 2021, HSM shipment, as well as the associated LDR form, are included in Attachment 25 as an example.

I reviewed all other manifest and LDR requirements and no issues or findings were noted.

5.0 SUMMARY OF FINDINGS

The inspection used as part of the layered process audit does not properly identify if the CAA located next to the assembly line is being inspected for leaking containers or the condition of the containers. I left a finding for failing to conduct weekly inspections of a CAA located next to the assembly line.

NOPF 3 – Failure to inspect CAA weekly [40 CFR 262.17(a)(1)(v)].

During the visual inspection, I observed a 10-gallon container in SAA 10, 12, and 16 that were not labeled with the words “Hazardous Waste” and were not labeled with an indication of the nature of the hazard.

NOPF 1 – Failure to label SAA container with the words “Hazardous Waste” [40 CFR 262.15(a)(5)(i)].

NOPF 2 – Failure to labeled SAA containers with the indication of the nature of the hazard [40 CFR 262.15(a)(5)(ii)].

The quick reference guide did not include a map showing where hazardous waste is generated and accumulated on site.

NOPF 4 - Failure to include a map that contains the locations where hazardous waste is generated and accumulated. [40 CFR 262.262(b)(4)].

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: 2021.08.09
16:09:25 -04'00'

Janosh Wolters
Energy Engineer
Date: August 9, 2021

AMBER
WHISNANT

Digitally signed by
AMBER WHISNANT
Date: 2021.08.10
16:03:56 -05'00'

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

Attachments:

- 1) Facility Layout (1 page)
- 2) IMT Photolog (1 page)
- 3) IMT Photos (6 photos/7 pages)
- 4) EPA Inspection Checklist (31 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 Report for Inspector (1 page)
- 9) Multispec Waste Profile (7 pages)
- 10) Hazardous Waste Rags Waste Profile (8 pages)
- 11) WWTP Analytical Results (1 page)
- 12) Solvent Mixture SDS (16 pages)
- 13) Biennial Report HSM Notification (4 pages)
- 14) CAA Log (1 page)
- 15) Layered Process Audit (23 pages)
- 16) Coolant SDS (10 pages)
- 17) Bedliner Waste Profile (7 pages)
- 18) Aerosol Cans Waste Profile (5 pages)
- 19) Aerosol Can SDS (12 pages)
- 20) Hazardous Waste Manifests (3 pages)
- 21) Universal Waste Certificate of Recycling (2 pages)
- 22) Contingency Plan (16 pages)
- 23) Quick Reference Guide (4 pages)
- 24) Training Record Attendance Sheet (1 page)
- 25) HSM Manifests (3 pages)

NOTICE OF PRELIMINARY FINDINGS

FACILITY NAME: Town Mold Tooling Company
ADDRESS: 500 Hwy 18W Garner, IA 50438
EPA ID NUMBER: IAD005286539 DATE: 06/23/2021

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.

1. Failure to label SAA containers with the word "Hazardous Waste"
(40CFR 262.15(a)(5)(i))
2. Failure to label SAA containers with the indication of the nature of
the hazard (40CFR 262.15(a)(5)(ii))
3. Failure to inspect CAA weekly (40CFR 262.17(a)(1)(v))
4. Failure to include all locations where hazardous waste is managed on a
map in guide reference guide (40CFR 262.262(b)(4))
5. _____
6. _____
7. _____

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: Scott EITON TITLE: DIRECTOR EHS

SIGNATURE: Scott EITON

This document was prepared by Amosh Wolters