REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

Transco Railway Products Inc.
300 7th Ave NW
Oelwein, IA 50662
(319) 238 - 6625

EPA ID Number: IAD984591487

On

January 26, 2022

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 Transco Railway Products Inc. (Transco) in Oelwein, Iowa on January 26, 2022. 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

Transco Railway Products Inc.:
Jay Tommasin, Safety, Health and Environment (SHE) Manager

EPA Representative, ERG:
Janosh Wolters, Energy Engineer

3.0 INSPECTION PRECEDURES

After arriving unannounced at Transco at approximately 09:10, I performed a drive-by visual inspection of the facility and took a photograph before beginning the inspection and did not note any areas of concern. I then entered the main entrance and I introduced myself to the front desk attendant, Ms. Amber Kleinlein. I explained my reason for being on site is to conduct a RCRA CEI and asked to meet with the facility personnel who manage hazardous waste on site. Mr. Tommasin then greeted me at the facility entrance and led me to his office to begin the opening conference at approximately 09:20. I initiated the opening conference with Mr. Tommasin as the Transco representative. I presented Mr. Tommasin 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 him with a copy of Title 18 U.S. Code, Sections 1001 and 1002. I then presented Mr. Tommasin with a copy of the *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections* and reviewed Transco's confidentiality rights. I informed Mr. Tommasin that I would provide a *Confidentiality Notice* at the end of this inspection.

The inspection consisted of a discussion of facility operations, waste generation and waste management, a review of waste management records, and a visual inspection of the waste generation and management areas. Mr. Tommasin 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. Tommasin guided me throughout 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 three SAAs and one CAA. The facility also handles universal waste in a designated area on site as shown on the facility layout. The universal waste storage area was visually inspected. Transco uses one parts washer on site. The parts washer utilizes a nonhazardous cleaning solution. I conducted an in-depth visual inspection of the SAAs, the CAA, the universal waste storage areas, used oil storage area, and all manufacturing areas.

Five 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. Tommasin with a *Confidentiality Notice, Receipt for Documents and Samples,* and a *Notice of Preliminary Findings (NOPF)* which he signed as acknowledgement of receipt (see Attachments 5, 6, and 7 respectively). No confidentiality claims were made by Transco.

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

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 (Facility copy)
Receipt of Documents and Samples (Facility copy)
NOPF (Facility copy)
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

Transco began operating in 1969 and currently employs approximately 140 people. The facility operates on a five day, two 8-hour shift schedule. The facility has a footprint of approximately 100 acres. Transco operations consist of railcar repairs and cleanouts. The primary raw materials used are water, paint, and solvents. The major manufacturing or processing operations that generate waste streams include cleaning, painting and repairing railcars. The following waste streams are produced: flammable hazardous heels, corrosive hazardous heels, waste paint related material, aerosol can residuals, paint booth filers, solvent/oily rags, parts washer solution, wastewater treatment plant (WWTP) sludge, wastewater, scrap metal, used oil, used oil filters, universal wastes, and general trash.

4.2 RCRA Status

According to the *Hazardous Waste Site Info Verification Report for Inspector* (see Attachment 8), Transco notified as a federal Large Quantity Generator (LQG) of D001, D002, D003, D008, D018, D035, F003, F005, and K061 hazardous wastes. I asked Mr. Tommasin 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. Mr. Tommasin requested I update the facility contact and confirmed the remaining information on the form was accurate to the best of his knowledge. After reviewing the records and walking through the facility, it appears the facility is operating as a federal LQG of D001, D002 and F005 hazardous wastes, a generator of used oil, and a small quantity handler (SQH) of universal waste. In addition, it is a possibility the

facility is generating a D035 hazardous waste (see Section 4.6 for more information). Transco 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.

Transco was previously inspected by an EPA contractor on May 3 and 4, 2016. The inspection led to a NOPF. The findings included a failure to label CAA containers with accumulation start dates, failure to label CAA containers with the words "Hazardous Waste", failure to keep a SAA container closed, failure to include home addresses for emergency coordinators in the contingency plan, and failure to include a complete evacuation plan in the contingency plan. I observed a repeat finding regarding the evacuation plan in the facility's contingency plan. See Section 4.12 of this report for more information. Transco 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 Transco 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	Flammable Hazardous Heels (Waste Profile included in Attachment 9)	Cleaning railcars	D001 as the primary waste code based on process knowledge and knowledge.	15,000 pounds per month	55-gallon containers in CAA	Tri State Motor Transit Company in Duenweg, Missouri (MOD095038998) to Chemtron Corporation in Avon, Ohio (OHD066060509) for fuel blending
	See Section 4.4 of this report for more information on each type of flammable hazardous heel waste generated on site. Attachment 9 is an example of a type of flammable hazardous heel waste I observed on site.					
2	Waste Paint Related Material (Waste Profile included in Attachment 10)	Painting operations	Facility determined hazardous for D001 and F005 based on process knowledge and knowledge of the product. However, additional waste codes may apply (see Section 4.6).	Four 55-gallon containers per month	55-gallon containers in SAAs	Tri State Motor Transit Company in Duenweg, Missouri (MOD095038998) to Chemtron Corporation in Avon, Ohio (OHD066060509) for fuel blending
	NOPF 1 – Failure to determine whether a waste meets any of the listings in 40 CFR 261 Subpart D. [40 CFR 262.11(c)]. This finding was rescinded after further review (see Section 4.6 for more information). **NOPF 3 – Failure to determine if a waste exhibits any of the characteristics identified in 40 CFR 261 Subpart C. [40 CFR 262.11(d)]**					
3	Corrosive Hazardous Heels (Waste Profile included in Attachment 11)	Cleaning railcars	D002 (based on process knowledge and knowledge of the product)	1,500 pounds per month	55-gallon containers in CAA	Tri State Motor Transit Company in Duenweg, Missouri (MOD095038998) to Chemtron Corporation in Avon, Ohio (OHD066060509)

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
4	Paint Booth Filters	Painting operations	Nonhazardous (based on process knowledge and knowledge of the product)	Not tracked – changed out approximately twice per year	20-yard container	Kluesner Sanitation in Farley, IA to Black Hawk County Solid Waste Landfill in Waterloo, IA for landfill
5	Solvent/Oily Rags (Invoice included in Attachment 12)	Maintenance and wiping off excess solvent from paint gun cleaning operations	Facility determined to be nonhazardous based on process knowledge. However, additional waste codes may apply (see Section 4.6).	75 rags per week	10-gallon containers	Laundered through City Laundry in Oelwein, IA for reuse
	NOPF 1 – Failure to determine whether a waste meets any of the listings in 40 CFR 261 Subpart D. [40 CFR 262.11(c)]. **NOPF 2 – Failure to make an adequate waste determination. [40 CFR 262.11(a)].** **NOPF 3 – Failure to determine if a waste exhibits any of the characteristics identified in 40 CFR 261 Subpart C. [40 CFR 262.11(d)].** See section 4.6 for more information on why this finding was left with the facility and for more information of my review of this waste stream.					
6	Aerosol Cans Residuals	Puncturing RCRA empty aerosol cans	D001 (based on process knowledge and knowledge of the product)	Less than one inch per year	55-gallon container in SAA #3	Tri State Motor Transit Company in Duenweg, Missouri (MOD095038998) to Chemtron Corporation in Avon, Ohio (OHD066060509) for fuel blending
7	Parts Washer (SDS included in Attachment 13)	Cleaning small tools	Nonhazardous (based on process knowledge and knowledge of the product via SDS)	15-gallons serviced every six months	In parts washer	Hydrite Chemical Company in Waterloo, IA (IAT200010593) for recycling

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
	See Section 4.8 for more information on how this waste was determined by the facility to be nonhazardous.					
8	WWTP Sludge (Waste Profile included in Attachment 14)	Cleaning out WWTP tanks	Nonhazardous (based on process knowledge and knowledge of the product)	275 gallons per month	275-gallon container	Covanta Environmental Solutions LLC in Cedar Rapids, IA (IAR000510438) for treatment
9	Wastewater (Discharge Agreement included in Attachment 15)	Washing/rinsing the outside of railcars	Nonhazardous (based on process knowledge and knowledge of the product)	Not tracked - permit allows up to 1,800 gallons per hour to be discharged	Directly piped to WWTP	Discharged to City of Oelwein POTW in Oelwein, IA for treatment
10	Used Oil	Maintenance of facility equipment and machinery	Exempted (managed as used oil per 40 CFR 279)	55-gallons every three months	55-gallon container	Cedar Falls Oil Company in Cedar Falls, IA (IAR000006478) for recycling
11	Used Oil Filters	Punctured and hot drained oil filters	Excluded/not a solid waste (based on process knowledge and knowledge of the product)	Two 55-gallon containers per year	55-gallon container	Cedar Falls Oil Company in Cedar Falls, IA (IAR000006478) for recycling

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
12	Scrap Metal	Excess material from maintenance and repairing railcars	Nonhazardous (based on process knowledge and knowledge of the product)	15-yard container picked up every three weeks	15-yard container	Alter Metal Recycling in Waterloo, IA for recycling
13	Universal Waste Lamps (Invoice included in Attachment 16)	Facility maintenance	Exempted (managed as universal waste per 40 CFR 273)	One 4-foot and one 8-foot container per year	4-foot container, 8-foot container	Graybar Electrical Company, Inc. in Chicago, IL for recycling
14	Universal Waste Batteries (Invoice included in Attachment 17)	Facility maintenance	Exempted (managed as universal waste per 40 CFR 273)	Two 5-gallon containers per year	5-gallon container	Veolia ES Technical Solutions LLC in Port Washington, WI (WIR000130591) for recycling
15	General Trash	Facility operations	Nonhazardous (based on process knowledge and knowledge of the product)	Three 20-yard containers picked up weekly	20-yard containers	Kluesner Sanitation in Farley, IA to Black Hawk County Solid Waste Landfill in Waterloo, IA for landfill

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

Transco has one Less-Than-90-Day CAA on site, which is located in a separate building labeled on the facility layout (see Attachment 1). I visually inspected the CAA and observed 21 55-gallon containers of hazardous waste. 18 of the containers held flammable hazardous heels (see Attachment 3, Photo 3). All of the containers were from cleanout operations of railcars containing ethyl alcohol. Mr. Tommasin stated that other flammable hazardous heels are generated from cleaning out railcars that contain ignitable constituents including, gasoline, diesel fuel, and other flammable substances. I asked Mr. Tommasin if these are managed under one generic waste profile. Mr. Tommasin stated the facility makes unique waste profiles for each type of ignitable waste based on the material being cleaned out of the railcars serviced on site. Mr. Tommasin stated the facility most commonly generates wastes that are hazardous for the ignitability characteristic (D001) or the corrosivity characteristic (D002). During records review, Mr. Tommasin was able to produce over fifty unique waste profiles for these waste streams. Mr. Tommasin stated a waste determination is made based on what type of material is being cleaned out of the railcar. The facility generates a unique waste profile for each material that is cleaned out of a railcar. The facility then ensures the waste stream is managed with all applicable EPA waste codes and the waste is shipped off site on a hazardous waste manifest. An example for one of the wastes I observed being accumulated in the CAA prior to being shipped off site is provided in Attachment 9. In addition, I visually observed three 55-gallon containers in the CAA that held waste paint related material. At the time of the inspection, I did not observe any D002 hazardous waste being accumulation. During records review, Mr. Tommasin provided a waste profile for a recently generated D002 hazardous waste as an example. The waste profile for an example of a D002 waste is provided in Attachment 11. The earliest accumulation start date on a container in the CAA was December 16, 2021. December 16, 2021 is within 90 days from the time of the inspection. The Less-Than-90-Day CAA containers were in good condition, labeled with the indication of the nature of the hazard, labeled with an accumulation start date, 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. I observed a fire extinguisher, spill control equipment, and related safety equipment within the CAA. Operators handling hazardous waste are trained to use their two-way radio system in case of emergencies. A sign was posted on the door of the CAA which listed the phone numbers of emergency coordinators and emergency response agencies along with a “No Smoking” sign. I asked Mr. Tommasin if the facility inspected the CAA. Mr. Tommasin stated the facility inspected the CAA at least weekly and had weekly inspection logs. During records review, Mr. Tommasin provided inspection logs for the CAA. I reviewed the logs and determined the facility was adequately performing weekly inspections of the CAA. Examples of the CAA logs are provided in Attachment 18. I did not note any issues or findings at the CAA during the inspection.

4.5 Satellite Accumulation Areas

I observed three SAAs during the visual inspection. 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	Paint Booth	Waste Paint Related Material	25 gallons	55-gallon drum
2	Paint Booth	Waste Paint Related Material	30 gallons	55-gallon drum
3	Aerosol Puncture Unit	Aerosol Can Residuals	Less than three inches	55-gallon drum

The hazardous waste accumulation containers observed in the three SAAs were in good condition, closed, labeled with the indication of the nature of the hazard, and labeled with the words "Hazardous Waste" (see Attachment 3, Photo 3). I reviewed the management of the SAAs and management of universal waste aerosol cans, and no issues or findings were noted.

4.6 Painting Booths

During the visual inspection, I observed four paint booths. At the time of the inspection, two paint booths were in operation. Each active paint booth had a 55-gallon container which was considered SAA #1 (see Attachment 3, Photo 4) and SAA #2. I asked Mr. Tommasin what the SAA containers were accumulating. Mr. Tommasin stated the SAA containers in the paint booth accumulate waste paint related materials which is primarily excess solvent flush from flushing paint guns. I asked Mr. Tommasin why the waste container and surrounding floor had what appeared to be spilled paint. Mr. Tommasin stated this must have been from paint operators spilling excess paint products on the outside of the 55-gallon container. All paint was completely dry and there were no signs of spilled MEK on the container or floor. I explained to Mr. Tommasin that when a spill occurs, it must be immediately cleaned up and disposed of properly. Upon further EPA review, a finding may be added for a failure to clean up a spill of potential hazardous waste. I asked Mr. Tommasin what type of solvent operators use to flush paint guns. Mr. Tommasin stated paint operators use methyl ethyl ketone (MEK). Mr. Tommasin stated the facility uses MEK to flush paint lines. At the time of the inspection, the waste was being managed as a D001 and F005 hazardous waste. During records review, I asked Mr. Tommasin for the SDS for MEK and waste profile for this waste. I reviewed the SDS which was manufactured by Barton Solvents with CAS number 78-93-3. Mr. Tommasin provided me with the waste profile shown in Attachment 10. The waste profile shows the complete chemical composition of the waste stream. During records review, I observed the chemical composition listed in the waste profile. The composition included ethyl benzene which I assumed to be a constituent of the solvent solution used to flush paint lines. Therefore, I believed the waste

stream would need to be managed as a F003 listed hazardous waste. During further review, I realized the ethyl benzene was only a constituent of the facility's paint waste and was not a constituent in the facility's MEK solution used to flush paint lines. Therefore, the ethyl benzene would not trigger this waste stream to be managed as a F003 listed hazardous waste. In addition, the MEK used by the facility shows a chemical composition of 100% MEK. The D035 waste code could potentially apply to this waste stream because the facility is using MEK to flush paint lines. It appears the waste stream is hazardous for D001, D035, and F005. Therefore, the following findings were left with the facility, but NOPF 1 was left inadvertently.

NOPF 1 – Failure to determine whether a waste meets any of the listings in 40 CFR 261 Subpart D. [40 CFR 262.11(c)].
NOPF 3 – Failure to determine if a waste exhibits any of the characteristics identified in 40 CFR 261 Subpart C. [40 CFR 262.11(d)].

I contacted Mr. Tommasin on March 21, 2022 and explained that NOPF 1 was left by mistake and that the facility appeared to be managing the waste stream with all applicable F listed waste codes.

During the visual inspection, I asked Mr. Tommasin how paint guns are flushed. Mr. Tommasin explained paint guns are flushed into the 55-gallon containers in SAA #1 and SAA #2 after painting operations are completed for each batch. Paint guns are attached directly to a 55-gallon container which runs MEK through the line and the excess flush is accumulated in a SAA container. Mr. Tommasin stated that the spout of the gun is wiped off with a rag that comes in contact with excess MEK. I asked Mr. Tommasin where the rags are put after being used. Mr. Tommasin stated the rags are used until they can no longer be used because they are too dirty and are brought to the maintenance area and placed into a 5-gallon container. During the visual inspection, I observed the 5-gallon container in the maintenance area which also included oily rags. It appeared that all rags did not contain any free liquids. Due to MEK being used to flush paint guns and contaminating the solvent rags after use, it appears the rags would need to be managed as a D001, D035, and F005 hazardous waste. I asked Mr. Tommasin where the rags are taken off-site. Mr. Tommasin explained the rags are laundered weekly with a third-party company, City Laundering Company (CLC) located in Oelwein, IA. Mr. Tommasin stated CLC picks up and replaces approximately 75 rags per week. I explained to Mr. Tommasin that the facility could manage these solvent contaminated rags under the exclusion set forth 40 CFR 261.4(a)(26) if all requirements therein are implemented and met. At the time of the inspection, Transco was not managing these rags under the exclusion nor as a hazardous waste. Therefore, I left the following findings:

NOPF 1 – Failure to determine whether a waste meets any of the listings in 40 CFR 261 Subpart D. [40 CFR 262.11(c)].
NOPF 2 – Failure to make an adequate waste determination. [40 CFR 262.11(a)].
NOPF 3 – Failure to determine if a waste exhibits any of the characteristics identified in 40 CFR 261 Subpart C. [40 CFR 262.11(d)].

4.7 Aerosol Cans

I asked Mr. Tommasin if aerosol cans are used on site. Mr. Tommasin stated aerosol cans are used rarely and mostly for touch ups on painting projects. Mr. Tommasin stated aerosol cans are used until RCRA empty and punctured. Mr. Tommasin stated if an aerosol broke or became unusable, an operator would immediately puncture the can and manage it as a hazardous waste.

4.8 Parts Washer

The facility operates one parts washer that uses a nonhazardous solvent solution. The parts washer is located in the maintenance area, next to the universal waste storage area as shown on the facility layout (Attachment 1). The parts washer holds 15-gallons of parts washer solution and maintenance staff utilize this parts washer to clean small tools. Mr. Tommasin stated the parts washer is used on an as-needed basis and is serviced twice per year by Hydrite Chemical Company in Waterloo, IA. The SDS for the parts washer solution is provided in Attachment 13. During records review, I reviewed the parts washer SDS and observed in Section 13 (Disposal Considerations), it stated the parts washer solution has the possibility of needing to be shipped off site with the D018 hazardous waste code. I asked Mr. Tommasin why the facility manages this waste as a nonhazardous waste if the SDS states it may need to be shipped off site as a D018 waste. Mr. Tommasin stated the facility has not sampled the material in the parts washer but believed the solution to be nonhazardous. Mr. Tommasin stated he believed that Hydrite added this possibility out of an abundance of caution and that he does not believe the solution to be hazardous for D018 based on the composition of the solution. Mr. Tommasin stated the parts washer is used to clean small maintenance tools that have not been contaminated with any hazardous wastes and therefore, the facility determined the waste to be nonhazardous. I explained to Mr. Tommasin the facility may need to conduct analytical testing to verify the assumption of the solution being nonhazardous.

4.9 Wastewater Treatment Plant

The facility operates an on-site WWTP. The WWTP is located on the eastern portion of the plant directly before crossing the railroad tracks as shown on the facility layout (see Attachment 1). Mr. Tommasin explained that the WWTP is located next to the wash bays which rinse off outsides of incoming railcars. Wastewater is generated and hard piped directly to the WWTP. The WWTP performs pH adjustment prior to being discharged to City of Oelwein POTW. Generation rates for wastewater are not tracked but Transco is permitted to discharge up to 1,800 gallons per hour per their wastewater discharge agreement. The agreement is provided in Attachment 15. The WWTP generates a sludge which is a nonhazardous waste. The waste profile for the WWTP sludge is provided in Attachment 14.

4.10 Universal Wastes

Transco manages universal waste in the maintenance area on site (see Attachment 3, Photo 2). The facility manages universal wastes in the maintenance area as labeled on the facility layout (see Attachment 1). During the visual inspection, I observed two 4-foot universal waste lamps containers (see Attachment 3, Photo 2). The 4-foot containers were closed, in good condition, and labeled as "Universal Waste Lamps." The earliest accumulation start date observed on a universal waste lamps container was "11/4/2021." In addition, I observed two 5-gallon containers of universal waste batteries. The 5-gallon containers were closed, in good condition, and labeled as "Universal Waste Used Batteries." The earliest accumulation start date observed on a universal waste batteries container was "12/9/2021".

During records review, Mr. Tommasin provided me with invoices for the universal waste lamps and batteries in Attachment 16 and 17, respectably. I observed the universal waste batteries invoice showed the waste was sent to *Grainger.* Per previous conversations during the inspection, Mr. Tommasin stated universal waste batteries were sent off site with *Veolia ES Technical Solutions LLC.* I asked Mr. Tommasin why the invoice was from *Grainger* and not from the off-site disposal company, *Veolia ES Technical Solutions LLC*. Mr. Tommasin explained the 5-gallon containers are purchased from *Grainer* but the 5-gallon container is prepaid with a FedEx label that is received with the new 5-gallon container. Once the 5-gallon container is ready to be shipped off site, the FedEx label is attached and the container is shipped directly to *Veolia ES Technical Solutions LLC* in Port Washington, WI (WIR000130591) for recycling. Both universal waste lamps and universal waste batteries have been shipped off site within the past year.

I reviewed the management of the universal waste storage area and no issues or findings were noted.

4.11 Used Oil

I visually observed the facility's used oil storage area located in the maintenance area as labeled on the facility layout (see Attachment 1). I observed one 55-gallon container accumulating used oil. Mr. Tommasin stated the facility generates approximately 55 gallons every three months. Mr. Tommasin stated the used oil is generated from maintenance operations on facility vehicles and forklifts. During records review, I observed an invoice from Cedar Rapids Oil Company in Cedar Rapids, Iowa. The containers were closed, labeled "Used Oil", and in good condition. I did not note any issues or findings at the used oil storage area.

4.12 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 19) was on file electronically and was reviewed while on site. The contingency plan had been revised on April 14, 2021 and included, emergency response procedures, emergency coordinators and contact information, and a list of emergency some response equipment. The contingency plan did not include a complete evacuation route or alternative routes. During records review, I asked Mr. Tommasin if the facility had designated evacuation routes or a map indicating where evacuation routes are located throughout the facility. Mr. Tommasin stated it must have been an oversight that this was not included in the contingency plan. Therefore, I left the following finding:

NOPF 4 – Failure to include in contingency plan a complete route, signal, and alternative route. [40 CFR 262.17(a)(6)→262.261(f)].

The facility had a quick reference guide prepared. 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 included a map showing where hazardous waste is generated and accumulated on site, and 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 issues or 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 Transco 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 Transco receive, I determined the training to be sufficient. Mr. Tommasin provided yearly records of completed trainings for all employees handling hazardous waste on site and emergency coordinators listed in the contingency plan. Jacob Steil, Plant Manager was listed as an emergency coordinator in the contingency plan. During records review, I observed both Timothy Zimmerman and Don Cole signed hazardous waste manifests. Mr. Tommasin stated both of these individuals were paint operators/supervisors. During records review, I observed proper job descriptions that explained their respective duties, initial training requirements, and continual training requirements. I

observed Mr. Steil, Mr. Zimmerman, and Mr. Cole completed annual RCRA hazardous waste refresher training on January 26, 2022. Mr. Tommasin instructs the annual hazardous waste refresher training and in addition, completes a third party RCRA refresher annually as well. I reviewed the attendance sheets and all training materials. Training records for Mr. Zimmerman, Mr. Cole, and Mr. Tommasin are included in Attachment 21 as examples.

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

Manifest and Land Disposal Restriction (LDR) Requirements – Transco maintained records of manifests on site at the time of inspection dating back three years. Transco generated approximately 42 manifests over the last three years. I reviewed all manifests from the last three years. A manifest is provided in Attachment 22 as an example.

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

5.0 SUMMARY OF FINDINGS

NOPF 1 – Failure to determine whether a waste meets any of the listings in 40 CFR 261 Subpart D. [40 CFR 262.11(c)]. At the time of the inspection, I believed the facility needed to manage the waste stream for the constituent of ethyl benzene which would have required the facility to manage this waste stream as a F003 listed hazardous waste. Upon further review, I realized the ethyl benzene was only a constituent of the facility's paint waste. Therefore, this finding was rescinded.

NOPF 3 – Failure to determine if a waste exhibits any of the characteristics identified in 40 CFR 261 Subpart C. [40 CFR 262.11(d)].

The facility uses MEK to flush paint lines. At the time of the inspection, the waste was being managed as a D001 and F005 hazardous waste. The D035 waste code could potentially apply to this waste stream because the facility is using MEK to flush paint lines. The facility was managing the waste stream with only the D001 and F005 hazardous waste codes.

NOPF 1 – Failure to determine whether a waste meets any of the listings in 40 CFR 261 Subpart D. [40 CFR 262.11(c)].

NOPF 2 – Failure to make an adequate waste determination. [40 CFR 262.11(a)].

NOPF 3 – Failure to determine if a waste exhibits any of the characteristics identified in 40 CFR 261 Subpart C. [40 CFR 262.11(d)].

At the time of the inspection, the facility was generating rags contaminated with MEK as a nonhazardous waste. The facility was not managing the contaminated rags under the exclusion set forth in 40 CFR 261.4(a)(26). It appears this waste stream needed to be managed as a D001, D035, and F005 hazardous waste.

NOPF 4 – Failure to include in contingency plan a complete route, signal, and alternative route. [40 CFR 262.17(a)(6)→262.261(f)].

During records review, I asked Mr. Tommasin if the facility had designated evacuation routes or a map indicating where evacuation routes are located throughout the facility. Mr. Tommasin stated it must have been an oversight that this was not included in the contingency plan.

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: 2022.03.21 19:16:17 -04'00'

Janosh Wolters
Energy Engineer
Date: March 21, 2022

AMBER WHISNANT

Digitally signed by AMBER WHISNANT
Date: 2022.03.22 13:21:01 -05'00'

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

Attachments:

1. Facility Layout (1 page)
2. Transco Railway Products Inc. Photolog (1 page)
3. Transco Railway Products Inc. Photos (5 photos/6 pages)
4. EPA Inspection Checklist (30 pages)
5. Confidentiality Notice (1 page)
6. Receipt for Documents and Samples (1 page)
7. Notice of Preliminary Findings (1 pages)
8. Hazardous Waste Site Info Verification Report for Inspector (1 page)
9. Hazardous Flammable Heels Waste Profile (2 pages)
10. Waste Paint Related Material Waste Profile (1 pages)
11. Hazardous Corrosive Heels Waste Profile (2 pages)
12. Rags Invoice (1 page)
13. Parts Washer SDS (7 pages)
14. WWTP Sludge Waste Profile (2 pages)
15. Discharge Water Agreement (4 pages)
16. Universal Waste Lamps Invoice (1 page)
17. Universal Waste Battery Invoice (1 page)

18. CAA Log (2 pages)
19. Contingency Plan (22 pages)
20. Quick Reference Guide (7 pages)
21. Training Records (4 page)
22. Manifest (1 page)

Notice of Preliminary Findings

(For Contractor Use Only)

Facility Name: Transco Railway Products Inc.

Facility Address: 300 7th Ave NW
Oelwein, IA 50662

EPA ID#: IAD984591487 **Date:** 01/26/2022

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

Citation	Description of Finding
1. 40 CFR 262.11(c)	1. Failure to determine whether a waste meets any of the listings in 40 CFR 261 Subpart D
2. 40 CFR 262.14(a)(7) → 262.11(a)	2. Failure to make an adequate waste determination.
3. 40 CFR 262.11(d)	3. Failure to determine if a waste exhibits any of the characteristics identified in 40 CFR 261 Subpart C.
4. 40 CFR 262.17(a)(6) → 262.264(a)	4. Failure to include in contingency plan a complete route, signal, and alternate route (if required).

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

This Notice prepared by Jarosh Wolters Date: 01/26/2022

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

Printed Name: Jay Tommasini Date: 1/26/22

Signature:

Title: SHE Manager

(Rev: 2/25/2020) White Original/ EPA • Yellow/ Facility