

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

IOWA DEPARTMENT OF TRANSPORTATION

800 Lincoln Way
Ames, IA 50010
515-239-1635

EPA ID Number: IAD107375263

On

November 16-17, 2021

By

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region VII
Enforcement and Compliance Assurance Division

1.0 INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division (ECAD), I performed a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at the Iowa Department of Transportation (IDOT) in Ames, Iowa. The inspection was conducted on November 16 & 17, 2021. The CEI was conducted under the authority of RCRA Section 3007(a), as amended. During the inspection, I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. This report and attachments present the results of the CEI. Based on the information obtained during the inspection, I inspected IDOT-Ames as a small quantity generator (SQG) of known hazardous waste (HW), used oil generator, and a small quantity handler of universal waste (SQHUW) lamps and batteries. According to the U.S. Environmental Protection Agency (EPA) RCRAInfo database, the facility had been previously inspected by the EPA on June 7-8, 2006.

2.0 PARTICIPANTS

Iowa DOT:

Brad Azeltine, Environmental Specialist Senior - Regulated Materials (26 years IDOT)
Donna Matulac, Assistant State Maintenance Engineer (25 years IDOT/ 4 years position)
Ken Williams, Tech, (12 years IDOT/ 4 years position)
Dan Judge, Material Lab Tech, (21 years IDOT, 5 years position)
Dave Roorda, District Mechanic (12 years IDOT)
Cory Anderson, Sign Shop Supervisor (22 years IDOT)
Shane Feters, Tech (26 years IDOT)

EPA:

Mark Holcomb, Civil Investigator (NOWCC/SEE) (Lead Inspector)
Dedriel Gardner, Environmental Scientist/Inspector (Training Preceptor)

3.0 INSPECTION PROCEDURES

On November 15, 2021, I contacted Mr. Brad Azeltine, our RCRAInfo contact for this facility. I informed Mr. Azeltine of my inspection visit for the following day and asked about their Covid-19 guidelines. Mr. Azeltine told me that their Covid protocols called for optional masks if vaccinated and mentioned that they also had a conference room we could base out of.

On November 15, 2021, at about 1600 hours, I arrived at the IDOT-Ames facility and conducted a visual 360-degree reconnaissance of the buildings/facility searching for areas of concern observable from the adjacent roadways and parking lot. I identified no environmental issues or concerns during this preliminary examination. On November 16, 2021, Dedriel Gardner and I arrived at the facility's main entrance to the Administration Building at about 0930 hours. Mr. Azeltine met us at the main door and invited us into the facility lobby. We introduced ourselves and checked in and received visitor IDs from security at the front desk. Mr. Azeltine then escorted us to a conference room near his office area. There we met Ms. Donna Matulac (Assistant State Maintenance Engineer).

At the opening conference, I introduced myself and presented my EPA ID. I also introduced my colleague Ms. Dedriel Gardner. I explained that I was the lead but also in training and that Ms. Gardner was my trainer and our credentialed inspector. Ms. Gardner presented her credentials. I explained the purpose and procedures of the inspection. I presented them with a copy of RCRA Section 3007(a), which provides 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 made them aware of their confidentiality rights and informed them that a Confidentiality Notice would be provided at the end of the inspection to make a confidentiality claim if they so desired.

The RCRA inspection consisted of a discussion of facility operations, waste generation, and waste management; a visual inspection of active waste generation and management areas; and a review of waste management records. During the visual inspection, Mr. Azeltine was present throughout the inspection. Ms. Matulac was present for the opening and the initial part of the visual inspection. I met other employees in their respective areas. These additional employees were introduced by Mr. Azeltine to answer my questions and/or escort us through their respective areas. The facility is the central IDOT facility in Iowa. There are around 100 smaller IDOT facilities throughout the State. The facility in Ames is a complex of around a dozen buildings spread out over an area of about 6 city blocks by 3 blocks (See Attachment #1) for the facility aerial view and (see Attachment #2) for facility diagrams.

I conducted a visual inspection of the following:

- **November 16, 2021**
 - Materials Lab Building (see Photos 2-18)
 - Lab # ML045 Bituminous Mix Lab
 - Lab # ML031 Physico-Chemical Lab
 - Storage Room ML030 just off the Physico Chemical Room
 - Lab ML031 – Physico-Chemical Lab (see Photos 10-12)
 - Lab ML027 - Analytical Chemistry Lab (see Photo 16-17)

- Repair Shop – East Central area - across the street from HyVee (see Photos 19-21)
- Central Accumulation Area (CAA) - on the far SE corner of the IDOT-Ames complex (see Photos 19-21)
- **November 17, 2021**
 - Area just West of CAA
 - Parked 18-wheeler semi-truck used to transport waste drums between IDOT facilities (see Photo 29)
 - Carpenter Shop (see Photo 30)
 - Sign Shop (see Photos 31-35)
 - Screen Cleaning Room
 - Silk Screening Room
 - Empty Drum Storage Area - just south of the CAA (see Photos 28, 36-43)

Document Photocopies and Photographs were collected as inspection documentation (see Attachments 1-37 and Photos 1-43). The photo log is included (see Attachment #3). Information collected during the inspection is documented on an Entry/Exit checklist and hazardous waste compliance checklists. I reviewed documents including the following: Safety Data Sheets (SDS); emergency plans; waste profiles; facility layouts; manifests; and land disposal restriction (LDR) notices.

On November 17, 2021, at the conclusion of the inspection, I held a closing conference. Participants included Mr. Azeltine, and Ms. Gardner. I provided Mr. Azeltine with a Receipt for Documents (Attachment #4) and a Confidentiality Notice (CBI) (see Attachment #5) which he signed as acknowledgement of receipt. No confidential business information (CBI) claims were made. I summarized my findings and recommendations and provided Mr. Azeltine with a Notice of Preliminary Findings (NOPF), which he signed to acknowledge receipt (see Attachment #6). I provided inspection and compliance assistance documents during the inspection that included the following:

- RCRA Section 3007(a)
- Title 18 U.S. Code, Sections 1001 and 1002
- Confidentiality Notice (Top page of the completed carbonless transfer set)
- Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA In Connection with Inspections Receipt for Documents and Samples
- Notice of Preliminary Findings (NOPF) with Instructions for Responding on back of form (top page of the completed carbonless transfer set)
- Instructions for Responding to a Notice of Preliminary Finding (NOPF) (EPA Handout)
- U.S. EPA Small Business Resource Information Sheet (EPA Handout)
- Solvent-Contaminated Wipes Final Rule Chart (EPA Handout)
- Recycling Electronics (IDNR Handout)
- Lead-Based Paint Activities (IDNR Handout)
- Excluded Solvent-Contaminated Wipe Rule (IDNR Handout)
- Battery Recycling/Disposal (IDNR Handout)
- Management of Fluorescent Lamps for Businesses (IDNR Handout)
- Incompatible Chemicals (IDNR Handout)
- Universal Wastes Including Aerosol Cans (IDNR Handout)

- TCLP Waste Determination Testing (IDNR Handout)
- Industry Sector Notebooks (EPA Handout)
- Environmental Compliance Assistance Centers (EPA Handout)
- e-Manifest Fact Sheet (EPA Handout)
- RCRA Online A Quick Reference Guide (EPA Handout)
- Requirements for Used Oil Management Standards (EPA Handout)
- Emergency Response Program (EPA Handout)
- Commercial Motor Vehicle Transportation System Security & Safety
- Security Awareness (EPA Handout)
- Chemical Facility Anti-Terrorism Standards (Homeland Security Handout)
- Iowa Life/Changing Iowa Department of Economic Development – Iowa Environmental Guide for Business

I followed the inspection procedures detailed in the RCRA CEI Standard Operating Procedure (SOP) 2321.1, unless noted otherwise.

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

Mr. Azeltine stated that the IDOT-Ames facility at this location began operations in the early 1920's. The IDOT-Ames facility employs approximately 800 staff mostly working Monday-Friday day shift. The IDOT-Ames facility is the main hub for the Iowa state-wide IDOT system for administration, planning, operations, project development, research, testing lab, and vehicle maintenance. The IDOT-Ames facility is approximately 45 acres (about 6 city blocks N-S by 3 city blocks E-W) with about a dozen buildings and several out-buildings (see Attachments #1 and #2). Raw materials used and for which facility includes: Carpenter Shop: dry wall for remodeling, paint, and solvent; Sign Shop: aluminum, ink, solvent rags, and solvent; Central Materials Lab: samples of road construction materials, trichloroethylene (TCE); Repair Shop: oil and antifreeze.

4.2 Facility RCRA Status

IDOT-Ames was last inspected for RCRA compliance on June 7-8, 2006, by the EPA. Primary findings from that inspection were failure to make an adequate hazardous waste determination, failure to keep universal waste and hazard waste containers closed, and failure to label container with date and nature of hazardous waste.

According to the RCRAInfo Waste Site Info Verification form, IDOT-Ames notified as a Small Quantity Generator (SQG) of D001, D002, D008, D009, D018, D035, D040 characteristic and F001, F002 and F003 listed hazardous wastes on July 29, 2021. I provided Mr. Azeltine with the Site Info Verification form, which he reviewed and returned with no changes (see Attachment #7). At the time of the inspection, based on the facility's hazardous waste generation rate (between 220 pounds and 2,200 pounds of non-acute hazardous waste generated per month), I determined IDOT-Ames to be an SQG of hazardous waste. In addition,

I determined IDOT-Ames to be a small quantity handler of universal waste-lamps, batteries, and a used oil generator.

4.3 Facility Waste Streams and Management

IDOT-Ames generates numerous different waste streams that are tracked in their Hazardous Waste Shipping History Report and IDOT-Ames Waste Shipments by Date Tracking Log (see Attachment #8). Mr. Azeltine stated that IDOT-Ames had changed their waste stream numbering system recently and provided a Waste Stream Old to New Numbering Crosswalk document (see Attachment #9). The following are the waste streams that were discussed in more detail.

Aerosol Cans – IDOT-Ames generates approximately 85-340 pounds (lbs) (one to four drums at 85 lbs each) per month of aerosol cans from repair shop and maintenance shop operations (see Attachment #8 for monthly tracking). According to the waste profile and manifests, they are determined to be universal waste in Iowa and D001 hazardous waste in Illinois based on generator knowledge (see Attachment #10). Transportation offsite is by Tradebe Transportation LLC (Tradebe) to the Tradebe Treatment and Recycling, LLC in East Chicago, Indiana. They are crushed for fuel blending.

Emulsion Oil / Diesel Mixture – IDOT-Ames generates zero to four 55-gallon drums per month at 300 lbs each, or 0-1200 lbs per month (see Attachment 8 for monthly tracking). It is generated by cleaning out application units and testing equipment. According to the waste profile, it is determined to be a D001 hazardous waste based on generator and process knowledge (see Attachment #36). It is collected in a satellite accumulation area (SAA) container at the point of generation and then when full it is taken to the CAA prior to being shipped offsite. Mr. Azeltine informed me that they also receive drums of this waste profile transferred from other IDOT-Ames facilities around the state (all are VSQG) and transported by their own freight drivers in IDOT owned semi-trucks. See the CAA section of the report below for more details on this process. Transportation offsite is by Tradebe to the Tradebe Environmental Services facility in East Chicago, Indiana for incineration.

Emulsion Oil in Cans – IDOT-Ames generates zero to two 55-gallon drums per month at 150 lbs each, or 0-300 lbs per month (see Attachment 8 for monthly tracking). It is generated by quality assurance (QA) control testing. According to the waste profile, it is determined to be a D001 hazardous waste by generator knowledge (see Attachment #11). It is collected in a SAA container at the point of generation and when full taken to the CAA prior to being shipped offsite. Transportation offsite is by Tradebe to the Tradebe Environmental Services in East Chicago, Indiana for incineration.

Waste Trichloroethylene (TCE) – IDOT-Ames generates zero to two 55-gallon drums (300 lbs each) or 0-600 lbs per month (see Attachment #8 for monthly tracking). It is generated in the labs by using as a solvent for cleaning testing equipment, analytic lab equipment, and dissolving asphalt from gravel. According to the waste profile and manifests, it is determined to be a D040, F001, F002 hazardous waste based on generator knowledge (see Attachment #12). For the TCE SDS see Attachment #13. The TCE containers observed were labeled as “Ignitable”, but this does not adequately describe the hazards presented by the waste per the SDS, which states TCE

is toxic and carcinogenic, but not flammable. NOPF 2F below references the need to add the toxic characteristic to the TCE labels. On-site management includes collecting in SAA containers under the lab hood and then transferring to the CAA when full. Transportation offsite is by Tradebe to the Tradebe Environmental Services in East Chicago, Indiana for incineration. Inside the ML045 Bituminous Mix Lab, I observed a blue metal 55-gallon SAA drum inside of a plastic containment container with a raised funnel lid and black rubber hose loosely inserted into the drum bung hole. It was about 1/3 full of waste TCE, in good condition, labeled to contain Trichloroethylene, but had no “hazardous waste” label (see Photos 10-12). The yellow “hazardous waste” label visible in Photo 10 was added at the time of the inspection. For a close-up view see Photo 11, which shows about a one-centimeter (cm) gap between the black rubber hose and the drum bung hole, making this an open SAA container. This was resolved by removing the hose and closing the bung hole at the time of the inspection (see Photo 12).

Also, in ML045 Bituminous Mix Lab, I observed a 4-liter (L) glass jug (with black cap) inside a lower-level closed cabinet. It was ¼ full, closed, in good condition, and labeled as: “*Caution - Halogenated Waste*” (see Photos 4 and 5). Mr. Azeltine told me it was used as a SAA container for TCE during analytical work. When full it is then transferred to the larger 55-gallon container. It had no “Hazardous Waste” label. This was corrected during the inspection.

In the ML031- Physico-Chemical Lab I observed a small container of methanol under the same hood as the TCE. In speaking with Dan Judge (Material Lab Tech), he stated that methanol waste is typically added to the waste TCE during their work. Mr. Azeltine stated that a hazardous waste determination will be needed on the TCE waste.

- **Label hazardous waste containers 4 L jug in ML045 Bituminous Mix Lab with “Hazardous Waste” in the following satellite containment areas as required in 40 CFR 262.15 (a)(5)(i): NOPF 1A**
- **Hazardous waste SAA container 55-gallon blue drum of TCE in the ML031- Physico-Chemical Lab must be labeled “Hazardous Waste” as required by 40 CFR 262.15 (a)(5)(i): NOPF 1D**
- **Hazardous waste SAA containers (55-gallon blue drum of TCE waste in the ML031- Physico-Chemical Lab and 4 L glass jug with black cap in ML045 Mix Lab) must be labeled with the correct nature of hazard as required by 40 CFR 262.15(a)(5)(ii): NOPF 2E and 2F**
- **SAA containers must be closed when not adding waste or temporarily venting the blue 55-gallon drum of TCE under hood in Physico-Chemical Lab ML031 as required by 40 CFR 262.15(a)(4): NOPF 3A**
- **Make an adequate hazardous waste determination on Physio Chem lab waste TCE in regard to methanol being added to the waste as required by 40 CFR 262.11: NOPF 11D**

Paint and Paint Related Items – IDOT-Ames generates zero to two 55-gallon drums (250 lbs each drum), or 0-110 lbs per month (see Attachment #8 for monthly tracking). This waste stream is also known as bulk paint, paint related materials, traffic paint, paint and thinner, paint in containers, and non-processable paint items. This waste is generated by regular department of transportation repair activities such as upkeep and repairs of roads, bridges, and transportation structures. In the Carpenter Shop, I observed two 55-gallon drums of used paint. The drums were closed, in good condition, and labeled with “Hazardous Waste – Ignitable” (see Photo 30). The nearest drum contained paint in the original one-gallon paint cans and was less than 1/3 full. The back drum was used for liquid waste paint and appeared to be empty. Both drums are located on top of a plastic containment pallet. According to the waste profile and manifest, it is determined to be a D001 hazardous waste based on generator knowledge (see Attachment #14). I asked Mr. Azeltine what type and volume of paint thinners was used for cleaning and if any contained F003 constituents because we observed some solvents that contained F003 in the area (such as acetone). He stated he was not sure and that a waste determination would need to be done. The waste paint is collected in the SAA drums in the Carpentry Shop until full and then transferred to the CAA until transferred off-site. Transportation offsite is by Tradebe to the Tradebe Environmental Services in East Chicago, Indiana for incineration. For an additional manifest see Attachment #15.

- **Make an adequate hazardous waste determination on the paint thinner solvent in the Carpenter Shop with the F003 code as required by 40 CFR 262.11: NOPF 11C**

Lead Paint Chips and Debris – IDOT-Ames generates a non-routine small amount (less than about 100 lbs annually) generally during paint removal and steel building maintenance. It is generated when peeling paint is observed. In the last year it was only generated on July 26, 2021 and May 17, 2021 (for monthly tracking see Attachment #8). According to the analytic report (see Attachment #17) and waste profile and manifests (see Attachment #18), this waste was determined to be a D008 hazardous waste. Transportation offsite is by Tradebe to the Tradebe Environmental Services in East Chicago, Indiana for treatment/disposal as applicable.

Universal Waste Lamps — IDOT-Ames generates around 1600 lamps twice per year or about 400 lbs per month that are from replacing spent bulbs from all their IDOT facilities located throughout the state (see Attachment 8 for monthly tracking). They are boxed up, labeled and dated, and transported to the CAA. ATEC out of Des Moines, Iowa picks up the waste lamps twice a year and processes them for recycling. For a sample manifest for universal waste including lamps, batteries, and e-waste see Attachment #19. During my inspection of the CAA, I observed one box of waste lamps damaged and partially open (see Photo 24). This was corrected at the time of the inspection by retaping the damaged cardboard box.

- **Universal waste lamps must be kept in closed and structurally sound containers as required in 40 CFR 273.13(d)(1): NOPF 5**

Universal Waste Batteries – IDOT-Ames generates approximately 100 lbs per month by replacing used/depleted batteries in operations (see Attachment #8 for monthly tracking). Batteries include NiCad, Lithium, Lead Acid, and miscellaneous alkaline AA, and AAA. For a sample manifest for universal waste including lamps, batteries, and e-waste see Attachment #19. ATEC out of Des Moines, Iowa picks up, transports, and processes the waste batteries for recycling. See CAA section for NOPF comments about the lead acid batteries.

Lab Packs (Unused and Outdate Chemicals) – IDOT-Ames generates a variable amount. The last shipment was on October 5, 2021 and was 25 pounds per manifest (see Attachment #18, pages 4-5, lines 13-15) and included hazardous waste codes: D002 and D008. They are generated by unused and outdated chemicals in the labs. The outdated and unused chemicals are collected in a lab pack and transported off-site by Tradebe to Tradebe in East Chicago, Indiana for treatment.

Oil Filters – IDOT-Ames collects used oil filters from IDOT facilities all over Iowa. IDOT-Ames last shipped offsite 27 55-gallon drums on October 27, 2021 and 40 55-gallon drums on June 11, 2021 (see Attachment #8 for monthly tracking). They were shipped as used oil. They are punctured and hot drained about a week at the generating facility and then sent to this IDOT-Ames facility for on-site temporary storage in the CAA. They are picked up and transported offsite as used oil by Rite Environmental for recycling (see Attachment #20) and Mr. Azeltine told me they are then sent to Central City, Iowa for final processing/recycling. In the Repair Shop I observed a 55-gallon metal drum labeled as “Used Filters”, but no “used oil” label (see Photo 20).

- **Used oil containers must be labeled with “Used Oil” as required by 40 CFR 279.22(c)(1): NOPF 6B**

Waste Acid – IDOT-Ames generates, in the Analytical Chem Lab ML027, approximately one quart once every four months. It consists of waste acid [hydrochloric acid (HCl)] from material testing on zinc galvanized coatings. Mr. Azeltine stated that it was a corrosive D002 hazardous waste based on generator knowledge (see Attachment 18 for manifest, page 5, line 15). Onsite management includes SAA collection in a 1-gallon (4-L) glass container under a lab hood. When full it is transferred to the CAA for lab packing. Transportation offsite is by Tradebe to the Tradebe Environmental Services in East Chicago, Indiana for treatment/disposal as applicable. In the Analytical Chem Lab ML027, I observed a 4-Liter brown glass container with a blue top, located in a cabinet under the lab hood (see Photos 17 and 18). It was about 1/4 full and its contents was unknown by Mr. Azeltine and no one else was in the lab to ask that knew. The container only had a handwritten label stating: “liquid haz waste”. After following-up on this waste stream, Mr. Azeltine later told me that this bottle contained “waste acid” that is added by the lab techs. I discussed with Mr. Azeltine that the word “hazardous” must be spelled out completely as required by 40 CFR 262.15 (a)(5)(i). He added a “Hazardous Waste – Corrosive” label to correct the labeling at the time of the inspection.

- **Label hazardous waste container (4 L glass bottle [blue cap] under hood in ML027 Analytical Chemistry Lab) with “Hazardous Waste” as required in 40 CFR 262.15 (a)(5)(i): NOPF 1E added after inspection**
- **Hazardous waste SAA container (4 L glass bottle (blue cap) under hood in ML027 Analytical Chemistry Lab) must be labeled with the correct nature of hazard as required by 40 CFR 262.15(a)(5)(ii): NOPF 2D**

Solid Waste (Wood from Treated Signpost) in 1-Gallon Brown Glass Container — IDOT-Ames generates a small quantity during analytical testing. In the ML027 Analytical Chemistry Lab I observed a 1-gallon brown glass container with a black top, located in a cabinet under a lab hood (see Photo 16). It had only a handwritten label stating: “solid waste”. It was about 1/3 full

and its contents was unknown by Mr. Azeltine and no one else was in the lab to ask that knew. Mr. Azeltine later told me that this contained “wood from a treated signpost” that was being tested to see how well the treatment worked. For a SDS of the CCA Treated Wood see Attachment #21. Other than above, no additional information was not obtained at the time of the inspection. Mr. Azeltine mentioned that this sample had been sitting there for “a long time” (exact time unknown) and needed to have a waste determination done to determine if it is a hazardous waste.

- [Rescinded after further review - label containers with correct nature of hazard as required in 40 CFR 262.15(a)(5)(ii) NOPF 2C –pending hazardous waste determination]
- **A hazardous waste determination must be made on all solid waste as required by 40 CFR 262.11: NOPF 11B**

EasiSolv 120 Ink Solvent – IDOT-Ames generates about one 55-gallon drum per year in the Sign Shop where it is used to clean screens used in the manufacturing of highway signs. On-site management includes collecting in a SAA container and transferring to the CAA when full. According to the waste profile, it is determined to be a D001 hazardous waste by generator knowledge (see Attachment #22). For a MSDS of the solvent see Attachment #23. Spent solvent is reclaimed on-site in the still (called the Minimizer) as discussed below until too dirty. Once too dirty it is transportation offsite is by Tradebe to the Tradebe Environmental Services in East Chicago, Indiana for H020 solvent recovery/distillation (see Attachment #24, pages 3-5).

Used Oil – IDOT-Ames generates an estimated 50-gallon per month from vehicle maintenance and repair activities. On-site the used oil is stored in an exterior above-ground 250-gallon tank next to the maintenance shop. It is transported and recycled by Cedar Falls Oil Company in Cedar Falls, Iowa (see Attachment #27). In the ML030 Lab storage room, I observed two full black 5-10-gallon metal containers of used oil labeled as “mineral oil”, but not “used oil” (see Photo 7). This was corrected at the time of the inspection with a blue label “non-regulated waste”, “used oil” (see Photo 8).

- **Label used oil containers with “Used Oil” as required by 40 CFR 279.22(c)(1): NOPF 6A**

“BBR fluid” (aka Methanol Waste) – IDOT-Ames generates approximately two gallons per change and changes are needed every two months between April and November, for approximately 16 gallons per year. The BBR solution is a three-part mixture of 33% methanol, 33% distilled water, 34% ethylene glycol and it is used as a coolant for some lab equipment. According to the waste profile and manifest, it is determined to be a D001, F003, and U154 hazardous waste based on generator knowledge (see Attachment #25). The BBR solution is managed on-site in SAA containers and transported to the CAA when full. Transportation offsite is by Tradebe to Tradebe Environmental Services in East Chicago, Indiana for incineration. In the ML030 Lab storage room, I observed two 10-gallon white plastic containers of the coolant “BBR fluid”. The top white bucket was about 2/3rds full, closed, in good condition, and properly labeled as “hazardous waste/ignitable”. The bottom white bucket was also closed, about 4/5th full, in good condition, but had no hazardous waste or nature of contents labels (see Photos 7 and 8). A yellow hazardous waste and nature of hazard label was added to the bottom container at the time of the inspection as shown in Photo 9.

- **Hazardous waste SAA containers must be labeled “Hazardous Waste” as required by 40 CFR 262.15 (a)(5)(i): NOPF 1B**
- **Hazardous waste SAA containers must be labeled with the correct nature of hazard as required by 40 CFR 262.15(a)(5)(ii): NOPF 2A**

E-Scrap Waste – IDOT-Ames generates approximately four pallets or 1500 lbs per month of miscellaneous electronics, computers, printers, TVs, monitors, of discarded office electronics Statewide from all IDOT facilities. They are stored in the Ames CAA. The waste is transported to Des Moines, Iowa by ATEC for recycling (see Attachment #19 and #26).

Oil Absorbents – IDOT-Ames generates about 300 lbs per months of pig mats and oil spill absorbents from IDOT maintenance facilities state-wide. I observed a 55-gallon drum containing oil absorbent pig mats (see Photo 19). The absorbents are collected in drums and transported by Tradebe to their Tradebe Environmental Services facility in East Chicago, Indiana for oil reclamation via heat treatment (see manifest in Attachment #18). No additional information was obtained regarding this waste stream at the time of the inspection.

Used Antifreeze – IDOT-Ames generates about 125 gallons twice per year (approximately 25 gallons per months) from vehicle maintenance. It is stored on-site in a 125-gallon above-ground tank. The used antifreeze is determined to be a non-hazardous waste by generator and process knowledge. It is transported and recycled by Rite Environmental in Waterloo, Iowa (see Attachment #28).

Parts Washer Solvent – IDOT-Ames did not have an estimated volume, but has about a dozen parts washers on-site, that are processed twice per year by Safety Kleen out of Des Moines, Iowa. They are used to clean parts (from auto maintenance and repairs) and tools and contain Safety Kleen Premium Solvent (see Attachment #29 for SDS). The spent solvent was determined to be non-hazardous per Safety Kleen based on generator and process knowledge. Safety Kleen changes out their solvent twice per year, which was estimated at 55-gallon every six months

Still Bottoms – The EasiSolv 120 Ink Solvent is reclaimed on-site in the still called the Minimizer, as discussed above. IDOT-Ames generates 25 lbs of still bottoms every three months, from a still. The still bottom’s (Minimizer) ink was determined to be a F003, F005, D001, D025, D005, and D018 hazardous waste based on generator and process knowledge. At the time of the inspection, I did not follow up further on the source of the additional waste codes beside D001. On-site management includes collecting the still bottoms “ink goo” in a 10-gallon drum. The still bottoms are picked up and transported by Safety Kleen every three months and sent to Safety Kleen facility in Des Moines, Iowa (see Attachment #30 for manifest). I observed the 10-gallon drum in the silk screen room that was 1/8 full that had no labels (see Photos 32-34).

- **Hazardous waste SAA containers must be labeled “Hazardous Waste” as required by 40 CFR 262.15 (a)(5)(i): NOPF 1F added after inspection**
- **Hazardous waste SAA containers must be labeled with the correct nature of hazard as required by 40 CFR 262.15(a)(5)(ii): NOPF 2G**

Excess Ink Waste (no solvent) – IDOT-Ames generates about 30 gallons of excess ink waste twice a year from their sign printing operations. Note–this waste profile name “Excess Ink” was a clarification and update relayed to me by Mr. Azeltine after the inspection after his questions and discussions with Tradebe. The Tradebe waste profile (see Attachment #31) lists it as a D001 hazardous waste based on generator and process knowledge. For two specific ink’s SDS (red and black that are used most often) from 3M see Attachments #32 and #33. In the Silk-Screening Room in the Sign Shop, I observed one yellow metal 35-gallon 1/8th full drum containing waste ink from sign printing processes. The drum was in good condition and securely closed and properly labeled. The drum was placed on top of a plastic containment base (see Photo 35). The drums are collected and transported offsite every six months by Tradebe to the Tradebe Environmental Services in East Chicago, Indiana for treated by incineration.

General Trash – IDOT-Ames generates approximately four 40-yard and four 20-yard dumpsters of general trash per month from general facility operations. The general trash is picked up once or twice per week by Waste Management Services and hauled to Resource Recovery Plant in Ames, Iowa and burned for energy.

Contaminated gloves and wipes – According to Mr. Williams (Lab Tech), IDOT-Ames generates approximately 30 gallons every six months of TCE contaminated gloves and wipes in an open, unlabeled, trash can under the hood in the ML031 Physico-Chem Lab (see Photo 13). Mr. Williams stated that it was their practice to dispose of TCE and methanol contaminated wipes and gloves in the gray, 30-gallon trash can (2/3 full). Mr. Williams told me that when the trash can is full, they call Bert (not clear on last name or role) at the Loading Dock to empty the trash can, however Mr. Williams did not know what Bert did with the trash he collected and suspects it is thrown out with the general trash. I asked Mr. Azeltine if they needed to do a waste determination on this waste and he stated yes.

- **Make an adequate hazardous waste determination on the contaminated gloves and wipes as required by 40 CFR 262.11: NOPF 11A**
- [Rescinded at time of inspection – container related findings to grey 30-gallon waste can in ML031, now pending a waste determination, as required in 40 CFR 262.15 (a)(5)(i); 40 CFR 262.15(a)(5)(ii); 40 CFR 262.15(a)(4): NOPF 1C, NOPF 2B, NOPF 3B]

4.4 Other Regulatory Requirements

Outside Facility Perimeter - I inspected the outside perimeter of the facility and observed no hazardous waste storage tanks, containers, or other stored waste. No findings of the outside facility perimeter were noted. It should be noted that this facility is a large multi-block complex with about a dozen buildings and with no one perimeter fence. There is locked security fencing around the CAA area and all buildings are locked and monitored by security and surveillance cameras.

CAA - The primary CAA is in a white fabric on concrete slab temporary type structure (see Photos 22-28). This is a controlled, limited access area. Emergency information (emergency coordinator’s name and phone number, and fire extinguisher’s locations) is posted near the door, both outside the facility and on a laminated notice next to the door inside the facility. I observed

that the large 4 ft x 4ft outside emergency contact signage (see Photo 22) was outdated. The primary emergency contact listed (Mary Kay Solberg) had retired two months earlier. The current emergency coordinator (Brad Azeltine) was listed on this sign as the alternate contact and his contact info was correct. Mr. Azeltine stated they are currently hiring for a new assistant and planned to update this sign after the new person is hired. The current contact's info was correctly listed on the information posted inside the CAA front door (see Photo 27), so this was not listed as a finding.

Mr. Azeltine tells me he conducts and logs weekly inspections of the CAA drums and facility. I noted fire extinguishers and a spill kit located in the CAA. The CAA contained a variety of waste including hazardous waste drums, used oil, universal waste – spent lamps, spent batteries, and e-waste such as used computers and printers. All were packaged and sealed in containers in good condition and properly labeled and dated except for as follows:

- In the hazardous waste area of the CAA (southeast quarter of the facility), I observed two full 55-gallon black metal drums marked with “*waste emulsion oil*” (note- this is the same waste stream discussed above and labeled as: **Emulsion Oil / Diesel Mixture**). Both drums were sealed, but the outside of the containers appeared to be splattered with oil (see Photo 23). Mr. Azeltine told me that these two containers had just been dropped off in the CAA by their IDOT freight driver after transferring from another Iowa DOT facility earlier this same day. IDOT has 18-wheeler semi-trucks they use for freight transportation (see Photo 29 for an example of one of the trucks). Mr. Azeltine told me that he normally would meet the driver at the CAA and make sure the containers are properly marked, but he was with me at the time of their arrival earlier in the day. Photo 23 was taken after Mr. Azeltine had marked both drums on the lid with a yellow marker: “11/16/2021 *hazardous waste, emulsion oil/diesel, ignitable*”. Mr. Azeltine told me that it was a normal process, since at least 2013 when his records started, for many if not most of the other IDOT facilities to transfer their hazardous waste oil emulsion drums to the central IDOT-Ames facility for temporary storage prior to transportation offsite by Tradebe to the Tradebe Environmental Services in East Chicago, Indiana for incineration. Of the total estimated volume above for this waste stream, Mr. Azeltine estimated that two drums per month were brought in from other outside IDOT facilities. Mr. Azeltine told me that all the other IDOT facilities (there are about 100 smaller IDOT facilities in Iowa) in the state of Iowa were VSQG except for the one in Charles City, Iowa. He said he would need to research this. After the inspection, Mr. Azeltine informed me that only the VSQG IDOT facilities transfer waste to his IDOT-Ames facility. The Charles City facility, which is a SQG, is a joint city, county and state facility and they have their own contracts and hazardous waste transport companies. I provided compliance assistance regarding 40 CFR 262.14(a)(5)(viii) and 17(f) and we discussed that for a VSQG facility to transfer hazardous waste to another related facility (under the control of the same person as defined in 260.10) the receiving facility must be a LQG to receive the hazardous waste from a related VSQG or a permitted facility.
 - **Operating as a storage facility without a permit by receiving hazardous waste from off-site (about two drums per month) as required by 40 CFR 270.1(c):**
NOPF 10
- I also observed one of the cardboard boxes of the Universal Waste-Spent Lamps was

damaged and partially open on one end (see Photo 24) exposing the individually boxed spent lamps as discussed above. This issue was resolved by Mr. Azeltine at the time of the inspection with packing tape.

- The spent lead acid batteries are stored in the southeast corner of the CAA facility. The floor appears to slope slightly from the northwest to the southeast as Mr. Azeltine also stated, where the hazardous waste steel drums of D001 emulsion oil/diesel mixture are located including the two steel drums of ignitable used emulsion oil/diesel. Additional hazardous waste drums located in the southeast “hazardous waste” section of the CAA included: two 55-gallon drums of “used trichloroethylene”, one 55-gallon drum of “emulsion oil in containers”, one 30-gallon drum of “paint & thinner”, and one 55-gallon drum of “paint in containers” (see Attachment #8, page 18 for the current hazardous waste inventory onsite). I observed the waste lead acid batteries being stored on wood pallets on the ground about 10 feet northwest of the hazardous waste containers (see Photos 25 and 26). According to 40 CFR 265 Appendix V, acids or incompatible with organics as the potential consequences are fire, explosion, or violent reaction. **I requested a diesel SDS but did not receive it prior to completing the inspection and therefore listed it on the NOPF as additional information requested.**
 - **Containers of incompatible waste must be separated or protected from each other specifically the spent lead acid batteries stored on the ground uphill from hazardous waste drums of organics in the CAA as required by 40 CFR 262.16(b)(2)(v)(c): NOPF 4**

Preparedness and Prevention - Mr. Azeltine stated IDOT-Ames has a full-time professional inhouse Environmental, Health and Safety (EHS) person. Landlines, mobile phones, and air horns are used onsite at some locations to alert company personnel in the event of an emergency. In most areas, the facility has a centralized fire alarm system, as well as sprinkler systems, numerous fire extinguishers, and eye-wash stations. However, there was no landline phone, communication capabilities, or sprinkler system in the CAA. Mr. Azeltine said he was typically the only individual that may be by himself working in the CAA and he had two cell phones including a company issued mobile phone. He also mentioned that he was planning to add an air horn to the CAA emergency equipment. I observed adequate spill response equipment near the CAA and emergency response signage posted next to the door of the CAA. The emergency response signage contained all necessary information (see Photos 22 and 27). Mr. Azeltine provided me with a copy of their written contingency plan called Iowa DOT Ames Complex Emergency Action Plan (see Attachment #35). The emergency plan mentions their local police, fire, and hospital, but Mr. Azeltine told me that they have not shared any information with or made any formal arrangements with their local fire, police, or hospital. I also noted that their facility map shows red stars for “designated building emergency entrance” to all the buildings containing hazardous waste SAA, but not the CAA building. The CAA additionally is not labeled on the facility map (see Attachment #2). They have security onsite and monitored surveillance cameras. The emergency coordinator is available onsite or via cell phone 24/7. They report no spills or emergency plan activations in the last three years.

- **Make arrangements with local emergency agencies as required by 40 CFR 262.16(b)(8)(vi)(A) NOPF 7**

- **Familiarize coordinating agencies, such as fire department, police department, emergency medical services, hospital, with layout, waste types, access points, evacuation routes, and likely casualty types as required by 40 CFR 262.16(b)(8)(vi)(A)(2): NOPF 8**

Personnel Training - I asked Mr. Azeltine to describe the training for IDOT-Ames employees with hazardous waste or universal waste handling responsibility and he stated that all employees (one exception noted below) undergo an initial orientation training in safety, emergency response, and hazardous waste handling. He stated that all employees with hazardous waste or universal waste handling responsibility undergo refresher training at least annually. Mr. Azeltine told me he has also completed the McCoy RCRA and HAZWOPER training. Mr. Azeltine told me that he is not aware of any hazardous waste handling training being provided to the IDOT freight drivers that monthly transport the D001 emulsion oil/diesel mixture waste from all the IDOT facilities to this main facility. I reviewed the personnel training program, and no other findings were noted.

- **Familiarize all employees with waste handling duties with hazardous waste handling and emergency procedures including the freight drivers as required by 40 CFR 262.16(b)(9)(iii): NOPF 9**

Other Issues – During my closing I asked for additional information on:

- Regarding 279.22(d) – are oil releases occurring at the empty oil drum storage facility? I identified an empty drum storage area just south of the CAA (see Attachment #1). There were approximately 100 empty 55-gallon drums stored on a 50 ft X 60 ft x 3 ft high wooden platform with a 2-inch-thick asphalt like surface. The drums are located on top of what Mr. Azeltine stated was an old bridge base of some kind. The surface had some stains that looked similar to leaking oil stains as well as some holes and cracks. I was not able to see underneath the structure (see Photos 36-43). Empty drums are transported and recycled by Industrial Container Services in Hasting, Minnesota (see Attachment #34).

5.0 SUMMARY OF FINDINGS

NOPF 1: Label hazardous waste containers with “Hazardous Waste” in the following satellite containment areas as required in 40 CFR 262.15 (a)(5)(i):

- A) 4 L jug in ML045 Bituminous Mix Lab
- B) Bottom white plastic 10-gallon bucket in Physico-Chemical Lab Storage Room ML030
- C) [Rescinded at time of inspection – referred to gray 30-gallon waste can in ML031, now pending a waste determination]
- D) 55-gallon blue drum of TCE in the ML031- Physico-Chemical Lab (added after the inspection) *(added after inspection)*
- E) 4 L (1-gallon) glass bottle (blue cap) under hood in ML027 Analytical Chemistry Lab *(added after inspection)*
- F) 10-gallon drum of still bottoms in Paint Shop *(added after inspection)*

NOPF 2: Label containers with correct nature of hazard as required in 40 CFR 262.15(a)(5)(ii):

- A) Bottom white plastic 10-gallon bucket in Physico-Chemical Lab Storage Room ML030
- B) [Rescinded at time of inspection – referred to gray 30-gallon waste can in ML031, now pending a waste determination]
- C) 1-gallon glass container with black cap under hood in ML027 Analytical Chemistry Lab
- D) 1-gallon glass container with blue cap under hood in ML027 Analytical Chemistry Lab
- E) Blue 55-gallon drum of Trichloroethylene (TCE) under hood in Physico-Chemical Lab ML031
- F) Correctly label all other TCE containers
- G) Black 10-gallon steel container of ink semi-solids “goo” in the Print Shop Screen Room

NOPF 3: Keep SAA containers closed when not adding waste or temporarily venting as required by 40 CFR 262.15(a)(4)

- A) Blue 55-gallon drum of Trichloroethylene (TCE) under hood in Physico-Chemical Lab ML031 as required by 40 CFR 262.15(a)(4)
- B) [Rescinded at time of inspection – referred to gray 30-gallon waste can in ML031, now pending a waste determination]

NOPF 4: Separate containers of incompatible waste or protect them from each other specifically the spent lead acid batteries stored on the ground uphill from hazardous waste drums in the CAA as required by 40 CFR 262.16(b)(2)(v)(c)

NOPF 5: Keep universal waste lamps in closed and structurally sound containers (found one box with damaged torn open end) as required in 40 CFR 273.13(d)(1)

NOPF 6: Label used oil containers with “Used Oil” as required by 40 CFR 279.22(c)(1)

- A) 5-gallon black drum in Storage Room ML030 labeled as “mineral oil”, needs “Used Oil” label
- B) 55-gallon drum in the Repair Shop labeled with “Used Filters” need “Used oil” label

NOPF 7: Make arrangements with local emergency agencies as required by 40 CFR 262.16(b)(8)(vi)(A)

NOPF 8: Familiarize coordinating agencies, such as FD/PD/EMS/Hospital, with layout, waste types, access points, evacuation routes, and likely casualty types as required by 40 CFR 262.16(b)(8)(vi)(A)(2)

NOPF 9: Familiarize all employees with waste handling duties with hazardous waste handling and emergency procedures including the freight drivers as required by 40 CFR 262.16(b)(9)(iii)

NOPF 10: Operating as a storage facility without a permit by receiving hazardous waste from off-site (about two drums per month) as required by 40 CFR 270.1(c)

NOPF 11: Make an adequate hazardous waste determination on the following as required by 40 CFR 262.11:

- A) Contaminated gloves and wipes in the metal waste can under the hood in the ML031 Physico-Chemical Lab
- B) Solid Waste treated signpost wood in the ML031 Physico-Chemical Lab
- C) Paint thinner solvent in the Carpenter Shop – F003 code
- D) Physio Chem lab waste TCE in regard to methanol being added to the waste

Additional information requested:

- Regarding 279.22(d) – are oil releases occurring at the empty oil drum storage facility (south of the CAA)?
- Diesel SDS
- Do you receive any oil emulsion/diesel deliveries from Charles City (another SQG)?

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.

MARK HOLCOMB Digitally signed by MARK
(Affiliate) HOLCOMB (Affiliate)
Date: 2022.01.04 17:26:18 -06'00'

Mark Holcomb
Civil Investigator

AMBER WHISNANT Digitally signed by AMBER
WHISNANT
Date: 2022.01.14 16:53:00 -06'00'

Amber Whisnant
RCRA Section Chief, ECAD/CB

Attachments:

1. Facility Aerial Photo (1 page)
2. Facility Diagrams (2 pages)
3. Photo log (22 pages / 43 photos)
4. Receipt for Documents (3 pages)
5. Confidentiality Notice (1 page)
6. Notice of Preliminary Findings NOPF (5 pages)
7. EPA RCRA Hazardous Waste Site Info Verification Report (1 page)
8. Hazardous Waste Shipping History Report and IDOT-Ames Waste Shipments by Date Tracking Log (19 pages)
9. Waste Profile Crosswalk (1 page)
10. Waste Profile Aerosol Cans and 10/5/2021 Manifest (6 pages)
11. Waste Profile Emulsion Oil (4 pages)
12. Waste Profile Trichloroethylene and 3/17/2021 Manifest (Line 8) (10 pages)
13. SDS TCE (6 pages)
14. Waste Profile Paint and 10/5/2021 Manifests (Lines 4, 5) (20 pages)
15. Manifest Paint Related and 10/15/2021 Manifest (Line 5) (8 pages)
16. LDR Notification (1 page)
17. Analytical Report Paint Chips (7 pages)
18. Waste Profile Lead Paint and 10/5/2021 Manifest (Line 8) (10 pages)
19. Bill of Lading UW Lamps (3 pages)
20. Manifest Used Oil (1 page)
21. SDS Treated Wood (9 pages)
22. Waste Profile EasiSolv Solvent (4 pages)
23. MSDS EasiSolv (2 pages)
24. EasiSolv 10/13/2020 Manifest (9 pages)
25. Waste Profile Methyl Alcohol and 4/22/20202 Manifest (12 pages)
26. Bill of Lading eWaste (3 pages)

Notice of Preliminary Findings

(For Contractor Use Only)

Facility Name: Iowa Department of Transportation
Facility Address: 800 Lincoln Way
Ames, IA 50010
EPA ID#: IAD107375263 Date: 11/17/2021

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

① 262.15(a)(5)(i)

Label hazardous waste container with "Hazardous Waste" in the following satellite areas:

A) 4L jug in MLO45 Bituminous mix Lab

B) Bottom white plastic 10gal bucket in the Physico-Chemical room

C) ~~Grey metal 30gal can under hood in MLO31 Physico-Chemical room~~ ~~WHT~~

② 262.15(a)(5)(ii)

Label containers with correct nature of hazard in:

If you have any questions about this Notice or wish to discuss your response, you may call me at

913-551-7310, or Kevin Snowden (Compliance Officer)
at 913-551-7020.

This Notice prepared by Mark Holcomb Date: 11/17/2021
Holcomb, mark@epa.gov 11201 Renner Blvd, Lenexa, KS 66219

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

Printed Name: Bradley E. Azeltine Date: 11-17-2021
Signature: [Signature]
Title: Environmental Specialist Senior

Page 1 of 5

(Rev: 2/25/2020)

White Original/ EPA • Yellow Facility

Notice of Preliminary Findings

(For Contractor Use Only)

Facility Name: Iowa Department of Transportation
Facility Address: 800 Lincoln Way
Ames, IA 50010
EPA ID#: IA 1073755263 Date: 11/17/2021

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

- A) Bottom white plastic 10 gal bucket in Physico-Chemical room storage room ML030
- B) ~~Grey metal 30 gal can under hood in ML031 Physico-Chem room~~ *STH*
- C) 1-gal glass container with black cap under hood in ML027 Analytical Chem
- D) 1-gal glass container with blue cap under hood in ML027 Analytical Chem
- E) Blue 55-gal drum of TCE under hood in ML031 Physico-Chem lab
- F) Correctly label all TCE containers *other*

If you have any questions about this Notice or wish to discuss your response, you may call me at

_____, or _____ (Compliance Officer)
at _____.

This Notice prepared by mark holcomb Date: 11/17/2021

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

Printed Name: *STH* Date: 11-17-2021
Signature: _____
Title: _____

Page 1 of ____

(Rev: 2/25/2020)

White Original/ EPA • Yellow/ Facility

Page 2 of 5

Notice of Preliminary Findings (Continued)

Media: RCRA

Facility Name: Iowa Dept of Transportation
 Facility Address: 800 Lincoln Way
Ames, IA 50010
 EPA ID#: IAD107375263 Date: 11/17/2010

Citation

Description of Finding

③ 262.15(a)(4)

G) Black 10-gal steel container of ink goop in screen room

Keep containers closed when not adding waste or temporary venting

A) Blue TCE 55-gal drum under hood in MLO31 physico-chem lab with loose fitting rubber filler hose

B) Gray 30-gal metal trash can with gloves ARE contaminated with solvent, under the hood in MLO31 physico-chem lab - pending MHA

B)M

④ 262.16(b)(2)(v)(c)

Separate containers of incompatible waste or protect them from each other - lead acid batteries stored on the ground uphill from hazardous waste drums in the CAA,

⑤ 273.13(d)(1)

Keep universal waste lamps in closed structurally sound containers - found one box with damaged torn open end

⑥ 279.22(c)(1)

Label used oil containers with "Used Oil"
 A) 5-gal black drums labeled as "mineral oil", needs "Used Oil" label, in MLO31

Initials of Recipient: BA

Date: 11-17-2021

Initials of Preparer: MHA

Date: 4/17/2021

Notice of Preliminary Findings (Continued)

Media: RCRA

Facility Name: Iowa Dept of Transportation
 Facility Address: 800 Lincoln Way
Ames, IA 50010
 EPA ID#: IAD 1077375263 Date: 11/17/2021

Citation

Description of Finding

- | | |
|--|---|
| <p>⑦ 262.16(b)(8)(vi)(A)</p> <p>⑧ 262.16(b)(8)(vi)(A)(2)</p> <p>⑨ 262.16(b)(8)(ii)</p> <p>⑩ 270.1(c)</p> <p>⑪ 262.11</p> | <p>B) 55-gal drums in repair shop of "Used Filters" needs "used oil" label</p> <p>make arrangements with local emergency agencies</p> <p>Familiarize coordinating agencies, such as FD/EMS/Hospital, with layout, waste types, access points, evacuation routes, and likely casualty types</p> <p>Familiarize all employees with waste handling and emergency procedures including freight drivers</p> <p>Operating as a storage facility without a permit by receiving hazardous waste from off-site (about 2 drums/month)</p> <p>Make an adequate HW determination on:
 A) Contaminated gloves + wipes in Physico-Chem
 B) Solid waste treated Post land waste
 C) Computer shop paint thinner solvent F003 code
 D) Physico-Chem lab waste TCE in regard to methanol being used and added to waste</p> |
|--|---|

Initials of Recipient: BA Date: 11-17-2021

Initials of Preparer: AMH Date: 11/17/2021

Notice of Preliminary Findings (Continued)

Media: _____

Facility Name: Iowa Dept of Transportation

Facility Address: 200 Lincoln Way

Ames, IA

EPA ID#: IA 107375263 Date: 11/17/2021

Citation

Description of Finding

Additional Info:

A) Regarding 279.22(d) - are oil releases occurring at the empty oil drum storage area

B) Diesel SDS

C) Do receive the oil emulsion/diesel from Charles City? SOG

Initials of Recipient: SDA Date: 11-17-2021

Initials of Preparer: MAH Date: 11/17/2021