

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

GOMACO CORPORATION PLANT 2

5913 E. Highway 175
Ida Grove, Iowa 51445
712-364-7082

EPA ID Number: IAD984568527

On

March 29, 2023

By

TOEROEK ASSOCIATES, INC.

For

U. S. ENVIRONMENTAL PROTECTION AGENCY

Region 7

Enforcement and Compliance Assurance Division

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, Toeroek Associates, Inc., and its subcontractor CLAENE Group (Toeroek team) conducted a hazardous waste compliance evaluation inspection (CEI) at Gomaco Plant 2 (Gomaco) at 5913 E. Highway 175 in Ida Grove, Iowa. The CEI was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. The CEI covered hazardous waste generator requirements, used oil management, and universal waste requirements, as applicable. This report and its attachments present the results of the CEI.

PARTICIPANTS

Gomaco:

Sean Benner, Manufacturing Engineering Manager
Greg Ebersole, Safety Director
Marc Lansink, Maintenance Supervisor

Toeroek Team:

Clifford Nelles, Inspector, 816-213-5192

INSPECTION PROCEDURES

Prior to the CEI at Gomaco on March 29, 2023, I conducted a drive-by visual inspection. I did not observe any areas of concern during the drive-by. At approximately 0750 hours, I entered the main office and informed the receptionist that I was there to conduct a CEI. I asked to speak with Mr. Ray Netherton, who was listed as the site contact on the Notification Acknowledgement/Verification Report (Verification Report) provided by EPA. The receptionist stated that Mr. Netherton retired approximately six months earlier and contacted Mr. Benner to advise him of my arrival. Mr. Benner met me in the reception area approximately 10 minutes later. I introduced myself and explained the purpose of my arrival. Mr. Benner and I adjourned to a conference room where we were joined by Mr. Ebersole. After introductions, I conducted an entry briefing with Messrs. Benner and Ebersole.

During the entry briefing, I presented my business card and EPA credentials to Messrs. Benner and Ebersole. I explained the scope and procedures for the CEI. I explained the facility's right to make confidentiality claims for any or all the information obtained and provided a Notice Regarding Proprietary/Confidential Business Information. I stated that at the conclusion of the CEI, Mr. Benner would be presented a Confidentiality Notice (Notice) with which he could make or not make a claim of confidentiality for the facility. I also provided Messrs. Benner and Ebersole a copy of U. S. Federal Codes 1001 and 1002, concerning communication of false statements and documents to federal inspectors, and RCRA Section 3007, explaining EPA's inspection authority, both of which they read.

A copy of each of the following documents was left with Mr. Benner during the inspection:

- RCRA Facility Access Information Sheet
- Mr. Trevor Urban's business card
- RCRA Section 3007
- U.S. Federal Codes 1001 and 1002
- Instructions for Responding to a Notice of Preliminary Findings
- Notice Regarding Proprietary/Confidential Business Information
- E-Manifest Fact Sheet: Generators
- Managing your Hazardous Waste: A Guide for Small Businesses
- U.S. EPA Small Business Resources Information Sheet
- Recycling Electronics: A Guide for Businesses
- Lead-Based Paint Activities: Handling and Disposal
- Battery Recycling/Disposal
- Management of Fluorescent Lamps for Businesses
- Incompatible Chemicals
- Universal Wastes – Including Aerosol Cans
- TCLP – Toxicity Characteristic Leaching Procedure
- Part 279 Requirements: Used Oil Management Standards
- EPA Region 7 Emergency Response Program
- Chemical Facility Anti-Terrorism Standards
- Iowa Environmental Guide for Businesses

I reviewed the Verification Report with Mr. Benner (Attachment 1). Based on this review, I updated the site contact information to include Mr. Benner's name, telephone number, and e-mail address. I made no other updates or changes to the Verification Report.

I conducted the visual inspection of the facility, accompanied by Messrs. Benner and Ebersole. Following the visual inspection, I reviewed facility records including waste determination documentation, hazardous waste manifests with land disposal restriction (LDR) notifications, Safety Data Sheets (SDS), contingency plan, and training documentation. I prepared and completed a site-specific inspection checklist to document my observations.

At the conclusion of the CEI, I conducted an exit briefing with Messrs. Benner, Ebersole and Lansink. During the exit briefing, I provided a Receipt for Documents and Samples, which Mr. Benner signed, acknowledging receipt (Attachment 2). I provided Mr. Benner the Notice, which he signed indicating no confidential business information had been provided (Attachment 3). I also provided Mr. Benner a Notice of Preliminary Findings (NOPF), which he signed to acknowledge receipt (Attachment 4).

A map of the facility obtained during the CEI is included in Attachment 5, and a Google Earth aerial photograph of the facility is included as Attachment 6. The 19 photographs taken during the CEI are included in Attachment 7.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

Gomaco manufactures concrete paving equipment such as curb and gutter machines, concrete slipform pavers, placer/spreaders, trimmer/placers, cylinder finishers, canal machinery, and related accessories. Raw materials used by Gomaco include steel, solvent-based paint, and solvent. The facility began operations at its current location in 1985. The facility employs approximately 300 full-time staff who work one shift (6:00 a.m. to 4:00 p.m.) Monday through Friday. The facility consists of two buildings on contiguous property—the manufacturing building, which covers approximately 270,000 square feet and a storage building.

Sheet steel, bar stock, and structural steel parts are received at the facility. Parts are fabricated, cut, and otherwise shaped on site. After shaping, parts are washed in a 5-step wash process—alkali cleaner, rinse, acid bath, rinse, and sealant. Every 2 to 3 months, the baths are replaced. Bath solutions are pumped out of the cleaning line into two aboveground tanks, tested, treated via pH adjustment, and then discharged to the City of Ida Grove publicly owned treatment works (POTW) under a pretreatment agreement. The facility considers this wastewater nonhazardous based on product and process knowledge and exempt from the definition of solid waste when discharged to the POTW as defined in Title 40 *Code of Federal Regulations* (40 CFR) 261.4(a)(1)(ii).

After parts are washed, they are taken to one of two hand-spray finish lines, which are distinguished only by the size of the parts being painted. Painters flush the lines with solvent daily. The waste paint and spent solvent mixture is discharged into satellite accumulation containers (SAC) associated with each line. The facility identifies this liquid waste as spent

solvent and waste paint related material (WPRM). This waste also includes excess, off-specification, or otherwise unwanted paint mixtures. Spent solvent and WPRM are considered to be hazardous based on product and process knowledge.

The majority of spent solvent and WPRM is reclaimed using an EcoPure Solvent Recycler distillation unit (still) which appears to be a 55-gallon capacity unit. Mr. Lansink said that the still is operated each production day. Still bottoms are removed from the still and are considered hazardous waste. They are accumulated in an SAC container in the distillation room, which is also the location of the hazardous waste container accumulation area (HWCAA). Still bottoms are transported to WRR Environmental Services in Eau Claire, Wisconsin, for disposal. Spent solvent and WPRM that cannot be reclaimed due to still capacity or waste composition is transported to WRR Environmental Services in Eau Claire, Wisconsin, for fuel blending.

Used paint booth filters are generated when filters are changed in the facility's two paint booths. The facility considers paint filters nonhazardous based on product knowledge, and the used paint booth filters are disposed in the general trash. Equipment maintenance activities at the facility generate used oil and used oil filters, both of which are managed as used oil according to provisions of 40 CFR Part 279. Used oil is transported to facilities owned and operated by Gomaco for burning in space heaters. Used oil filters are transported to Filter Recycling in Cherokee, Iowa, for recycling. Equipment maintenance also generates spent parts washer solvent, which is considered nonhazardous based on product knowledge. Spent parts washer solvent is added to the used oil waste stream for burning at Gomaco-owned and operated facilities.

Building maintenance generates used lamps and general trash. The facility is converting to green-tipped or green-labeled lamps, which are considered nonhazardous based on product knowledge. However, the facility still generates some silver-tipped used lamps, which are considered hazardous. All used lamps are managed as universal waste according to provisions of 40 CFR Part 273 and are transported off site for recycling. General trash is considered nonhazardous based on product and process knowledge, and is transported to the Ida County Landfill in Ida Grove, Iowa, for disposal.

The facility was last inspected on July 10, 2013 by an EPA contractor. The inspector left the following preliminary findings:

- Failure to label a used oil storage container with the words "used oil,"
- Failure to close containers of universal waste lamps
- Failure to label containers of universal waste lamps with the words "used lamps," "waste lamps," or "universal waste lamps"
- Failure to date or otherwise document accumulation time for universal waste lamps,
- Failure to close SACs
- Failure to mark hazardous waste accumulation containers (HWACs) with an accumulation start date
- Failure to submit exception reports for unreturned manifests
- Failure to maintain a contingency plan
- Failure to maintain a hazardous waste training program

- Failure to make a waste determination on used paint filters
- Failure to label HWACs with the words “hazardous waste

Of these preliminary findings, failure to label and date/track accumulation times for universal waste lamps accumulation containers, failure to close a SAC, failure to maintain a contingency plan, and failure to make an adequate waste determination on used paint filters were repeated during this CEI.

2. RCRA Status

Gomaco is identified as a large quantity generator (LQG) of hazardous waste (generating more than 1,000 kilograms [kg] of hazardous waste per month) on the Verification Report provided by EPA (Attachment 1). During the CEI, I reviewed hazardous waste manifests generated over the last three years as well as the facility’s 2021 Biennial Report obtained from the EPA Region 7 Records Center prior to the inspection (Attachment 8). Based on the 2021 Biennial Report the facility shipped 28,625 pounds (12,984 kg) of hazardous WPRM and still bottoms off site for fuel blending or disposal. This equates to approximately 2,385 pounds (1,082 kg) of hazardous waste per calendar month. In addition, spent solvent being reclaimed at the site must be counted toward the facility’s generator status. According to Mr. Lansink, 55 gallons of WPRM is reclaimed in the still each production day. With the current recovery rate, he said that 50 gallons of solvent is returned, and he tops the container with an additional 5 gallons of new solvent. I added 55 gallons of spent solvent (first still run) plus five gallons per day for 20 production days to get 155 gallons of spent solvent (estimated at 1,085 pounds [492 kg]) per calendar month. Therefore, I determined the facility generates 2,382 pounds (1,082 kg) of WPRM and still bottoms for offsite shipment plus 1,085 pounds (492 kg) of WPRM for reclamation each calendar month, for a total generation rate of 3,467 pounds (1,574 kg) of hazardous waste per month.

Based on the calculated generation rate, I concluded that Gomaco is currently operating as a LQG of hazardous waste. Gomaco is also a small quantity handler (SQH) of universal waste (accumulating less than 5,000 kg of universal waste at any time) and a generator of used oil.

The facility operates one less-than-90-day HWCAA in the distillation area.

3. Waste Streams

This section of the CEI report describes waste streams generated by the facility, including the facility’s waste determination and waste codes, generation process and rate, management at the facility, and disposition. The following discussion of waste streams is based on conversations with Mr. Benner, the visual inspection, and my review of waste shipping documents.

Messrs. Benner and Ebersole accompanied me throughout the CEI, and Mr. Lansink participated during the majority of the visual inspection. All inspection participants were provided a copy of U.S. Federal Codes 1001 and 1002, which they read.

Wash bath waste is generated when the bath solutions for cleaning and pretreating shaped metal parts are replaced. Every 2 to 3 months, wash bath waste is pumped from the cleaning line to one of two aboveground tanks, tested, treated via pH adjustment, and then discharged to the City of

Ida Grove POTW under a pretreatment agreement. The facility considers wash bath waste to be wastewater and considers it nonhazardous based on product and process knowledge. When discharged to the POTW, the facility considers the treated wastewater exempt from the definition of solid waste, as defined by 40 CFR 261.4(a)(1)(ii). Messrs. Benner and Ebersole were not sure of the generation rate but thought that the facility had not exceeded the pretreatment agreement discharge limit of 1,400 gallons per day when discharging treated wastewater.

Spent solvent and WPRM are generated when paint lines are flushed with solvent or when excess, off-specification, or otherwise unwanted paint mixtures are determined to be waste. The facility considers this spent solvent and WPRM hazardous (D001, D035, F003, F005) based on product and process knowledge. According to Mr. Benner the facility uses methyl ethyl ketone (MEK) as the primary solvent. A copy of the SDS for MEK is included as Attachment 9. Copies of the SDSs for prime paint BUFF HIGH SOLIDS URA-ZEN PRIMER and topcoat paint YELLOW HIGH-SOLIDS URA-ZEN are included as Attachments 10 and 11. I calculated the facility generates approximately 1,725 pounds of spent solvent and WPRM per calendar month. The waste is accumulated in SACs and is transferred to HWACs. The majority of spent solvent and WPRM is reclaimed through onsite distillation. Spent solvent and WPRM that cannot be reclaimed due to still capacity or waste composition is transported to WRR Environmental Services in Eau Claire, Wisconsin, for fuel blending.

During the CEI, I observed two 5-gallon SACs of spent solvent and WPRM in the prime coat paint booth (Attachment 7, Photograph 4). I could not take photographs within the paint booth. The two SACs were structurally sound, at the point of generation, under control of the operator and closed. However, the SACs were not labeled with the words “hazardous waste,” as required by 40 CFR 262.15(a)(5)(i) (**NOPF No. 1**). The SACs were also not labeled with an indication of the nature of the hazard, as required by 40 CFR 262.15(a)(5)(ii) (**NOPF No. 2**).

I observed two 5-gallon SACs of spent solvent and WPRM in the topcoat paint booth (Attachment 7, Photograph 19). The two SACs were structurally sound, at the point of generation, and under control of the operator. However, the SACs were not labeled with the words “hazardous waste,” as required by 40 CFR 262.15(a)(5)(i) (**NOPF No. 1**). The SACs were not labeled with an indication of the nature of the hazard, as required by 40 CFR 262.15(a)(5)(ii) (**NOPF No. 2**). The SACs were also not closed, as required by 40 CFR 262.15(a)(4) (**NOPF No. 8**).

NOPF No. 8 was not included on the NOPF form left at the facility but was added on April 12, 2023. Mr. Benner was notified of its addition by email on April 12, 2023. During the CEI, I provided compliance assistance regarding management of SACs.

During the CEI, I observed two HWACs of spent solvent and WPRM adjacent to the still awaiting reclamation (Attachment 7, Photographs 5 and 6). One container was full and the other held approximately 30 gallons of waste. The HWACs were structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and marked with accumulation start dates of March 23 and 24, 2023.

I discussed options for management of spent solvent WPRM as hazardous secondary material (HSM) with Messrs. Benner, Ebersole, and Lansink during the CEI.

Still bottoms are generated from the distillation of spent solvent and WPRM. According to Mr. Lansink, 55 gallons of solvent is decanted into the still, and the still is operated once each production day. With the current recovery rate, he said that 50 gallons of reclaimed solvent is returned, and 5 gallons of new solvent are added to top off the container. A copy of the solvent reclamation record for March 2023 is included as Attachment 12. The facility considers still bottoms hazardous (D001, D035, F003, F005) based on product and process knowledge. Approximately 1,638 pounds of still bottoms are generated per month. Still bottoms are accumulated in a SAC adjacent to the still, and full SACs are transferred to the HWCAA. The waste is transported to WRR Environmental Services in Eau Claire, Wisconsin, for disposal.

During the CEI, I observed the still and adjacent 55-gallon SAC of still bottoms (Attachment 7, Photographs 7 through 9). The SAC was structurally sound, at the point of generation, under control of the operator, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and held approximately 15 gallons of waste.

I observed four HWACs of still bottoms staged on the loading dock awaiting transportation that day to WRR Environmental Services in Eau Claire, Wisconsin (Attachment 7, Photographs 1 through 3). An employee of Gomaco was monitoring the HWACs. The HWACs were structurally sound, full, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and marked with accumulation start dates. The oldest accumulation start date was March 13, 2023. I also observed two HWACs of still bottoms in the HWCAA. The HWACs were structurally sound, full, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and marked with accumulation start dates of March 24 and 29, 2023. I noted no deficiencies with management of still bottoms during the CEI.

Used paint booth filters are generated when paint booth filters in the two paint booths are replaced. The facility considers used paint booth filters nonhazardous and consolidates the waste with general trash for landfill disposal. According to Messrs. Benner and Lansink, the facility generates approximately 72 used filters every three weeks. They said that the filters were dry when taken down, so they concluded the filters were no longer ignitable. When I reviewed the SDS for the most commonly used paints, I noted the primer contains 10 to 20 percent barium sulfate (Attachment 10, Page 2). The primer also contains 5 to 10 percent MEK.

I asked Mr. Benner if the facility had done any testing on the used paint booth filters to determine if they were hazardous for toxicity characteristic, including barium and MEK. He stated that the previous environmental employee may have submitted a paint booth sample for analytical testing in response to the preliminary findings of the previous CEI. However, he stated that the environmental employee had left Gomaco approximately 6 months prior to the inspection, and no record or report for paint booth filter analysis had been found. I concluded that the facility had failed to make an adequate waste determination on used paint booth filters, as required by 40 CFR 262.11 (**NOPF No. 9**).

NOPF No.9 was not included on the NOPF form left with the facility but was added on April 12, 2023. Mr. Benner was notified of its addition by email on April 12, 2023. During the CEI, I

provided compliance assistance regarding hazardous waste determinations. I did not observe used paint booth filters in accumulation during the CEI.

Used oil is generated during maintenance of hydraulic equipment. The facility manages used oil according to provisions of 40 CFR Part 279. The facility generates approximately 55 gallons of used oil every 3 months. The waste is accumulated in a 55-gallon used oil storage container. According to Mr. Ebersole, used oil is transported by Gomaco employees, 55 gallons at a time, to one of two other facilities, also owned by Gomaco, to be burned in used oil space heaters. One building is the Godbersen Equipment Company (GEC), which is owned by a different division of Gomaco Corporation and is located at 301 E. Highway 175, Ida Grove, Iowa. The other building is the “MAU Building,” a storage building located at 100 Jacobs Avenue, Ida Grove, Iowa, operated by the same division of Gomaco Corporation. According to Mr. Ebersole, used oil at GEC is burned in a Reznor RA500 heater, which has a heat output of less than 500,000 British thermal units (BTU), and used oil at the MAU Building is burned in two Reznor RA350 heaters, which each have a heat output of 300,000 BTUs. Mr. Ebersole stated that all space heaters are vented to ambient air and that Gomaco Corporation does not burn any used oil received from other generators.

During the CEI, I observed a 55-gallon used oil storage container in the maintenance shop (Attachment 7, Photograph 13). The used oil storage container appeared to be structurally sound with no apparent leaks or damage, was labeled with the words “used oil,” and held approximately 25 gallons of used oil. I noted no deficiencies with management of used oil during the CEI.

Used oil filters are generated during maintenance of facility equipment. The facility manages used oil filters as used oil under provisions of 40 CFR Part 279. According to Mr. Benner, Gomaco generates approximately 55 gallons of used oil filters every 2 to 3 months. Used oil filters are accumulated in used oil storage containers and collected by Filter Recycling in Cherokee, Iowa, for recycling.

During the CEI, I observed one used oil storage container that held used oil filters (Attachment 7, Photograph 14). The used oil storage container appeared to be structurally sound with no apparent leaks or damage, was labeled with the words “used oil,” and held approximately 10 used oil filters. I noted no deficiencies with management of used oil filters during the CEI.

Used lamps are generated during facility maintenance. Although the facility is currently transitioning to lower mercury, nonhazardous lamps, the transition is not complete. The facility considers the older lamps hazardous waste and manages all used lamps as universal waste according to provisions of 40 CFR Part 273. Mr. Benner estimated the facility generates approximately 25 used lamps per month. Used lamps are accumulated in universal waste accumulation containers in the maintenance shop. Used lamps are collected by ATEC Recycling in Des Moines, Iowa, for recycling.

During the inspection, I observed a 4-foot universal waste lamps accumulation container in the maintenance shop (Attachment 7, Photographs 15 and 16). The universal waste accumulation container was structurally sound, closed, and held approximately 25 used lamps. However, the

universal waste accumulation container was not labeled with the words “universal waste lamps” or “waste lamps” or “used lamps,” as required by 40 CFR 273.14(e) (**NOPF No. 3**). The universal waste accumulation container was also not dated or otherwise tracked to demonstrate accumulation time, as required by 40 CFR 273.15(c) (**NOPF No. 4**).

I asked Mr. Lansink how long the used lamps have been accumulating. He stated that the used lamps have been accumulating since the last collection on February 9, 2023. A copy of an invoice for the last collection of used lamps, dated February 9, 2023, is included as Attachment 13.

I also observed an 8-foot universal waste lamps accumulation container in the maintenance shop (Attachment 7, Photographs 17 and 18). The universal waste accumulation container was structurally sound, closed, and dated March 7, 2023. The universal waste accumulation container was labeled with “universal waste” decals, but labeling was not completed to the phrases “universal waste lamps” or “waste lamps” or “used lamps,” as required by 40 CFR 273.14(e) (**NOPF No. 3**).

I provided compliance assistance regarding management of universal waste lamps during the CEI.

Spent parts washer solvent is generated during maintenance of two parts washers in the maintenance shop. According to Mr. Lansink, only one of the parts washers is regularly used. The facility considers spent parts washer solvent nonhazardous based on product and process knowledge. An SDS for Ashland 142 Solvent is included as Attachment 14. Based on the SDS, the facility’s waste determination appears to be adequate. According to Mr. Lansink, Gomaco personnel service the parts washers approximately every six months. He estimated that the facility generates less than 1 gallon of spent solvent during servicing and stated that spent parts washer solvent is mixed with used oil for management as used oil according to provisions of 40 CFR Part 279. Used oil is burned in space heaters at facilities owned and operated by Gomaco Corporation. I did not observe spent parts washer solvent in accumulation during the CEI.

General trash consists of nonhazardous production wastes, packaging wastes, and general office-type refuse. The facility considers general trash nonhazardous based on product knowledge. The waste is accumulated in various containers throughout the facility. General trash is collected by Ida County Sanitation and transported to the Ida County Landfill in Ida Grove, Iowa, for disposal. I noted no deficiencies related to management of general trash during the CEI.

4. Required Response Equipment and Hazard Management

Per 40 CFR 262.15(a)(8) and 262.17(a)(6), a LQG must operate to minimize the possibility of a fire, explosion, or spill, and must maintain emergency response equipment. During the visual inspection, I observed spill response equipment comprised of mats, absorbent materials, shovels, and brooms, as well as the presence and availability of fire extinguishers. I determined that the spill and fire response equipment was adequate for the hazardous wastes generated and accumulated at the facility.

5. Container Accumulation Areas

Gomaco maintains one HWCAA in the distillation area. Before inspecting the distillation area, I observed four HWACs that had been moved to the loading dock to be picked up by Barton Solvents that day for transport to WRR Environmental in Eau Claire, Wisconsin (Attachment 7, Photographs 1-3). An employee of Gomaco was monitoring the HWACs. All four HWAC were structurally sound, full, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and marked with accumulation start dates. The oldest accumulation start date was March 13, 2023.

I observed two HWACs of spent solvent and WPRM adjacent to the still awaiting reclamation (Attachment 7, Photographs 5 and 6). One container was full and the other held approximately 30 gallons of waste. The HWACs were structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and marked with accumulation start dates of March 23 and 24, 2023.

I also observed two HWACs of still bottoms in the HWCAA. The HWACs were structurally sound, full, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and marked with accumulation start dates of March 24 and 29, 2023. I noted no deficiencies with management of still bottoms during the CEI.

According to Mr. Benner, the HWCAA is inspected weekly, and a log is maintained. I reviewed the inspection log for the last three years and noted no deficiencies. A copy of the inspection log from July 18, 2022, through March 27, 2023, is included as Attachment 15. I asked Mr. Benner how a worker would summon emergency assistance. He stated that all workers who handle hazardous waste are required to carry a two-way radio.

6. Manifests and Biennial Report

Gomaco generated manifests for 46 hazardous waste shipments from March 29, 2020, to March 29, 2023. During the CEI, I reviewed manifests and LDR notifications for five shipments in 2020, five in 2021, five in 2022, and three in 2023. Copies of the manifest and LDR notification for a shipment on January 18, 2023, are included in Attachment 16 as an example. I noted no deficiencies during my review of manifests.

The Hazardous Waste Biennial Report for 2021 was submitted on February 28, 2022 (Attachment 8).

7. Preparedness and Prevention Plan

LQG facilities are required by 40 CFR 262.17(a) to meet the emergency preparedness, prevention, and procedures requirements including documented arrangements with response agencies. According to Mr. Benner, Gomaco is the subject of a regular inspection by the Ida Grove Fire Department hazardous materials team. During those inspections, he said the fire department is shown the layout of the facility, the location of the HWCAA, and other facility features.

During the CEI, I reviewed the facility's contingency plan. The contingency plan was dated July 30, 2020, and a copy is included in Attachment 17. I reviewed the contingency plan against content requirements of 40 CFR 262.261. I noted the primary emergency coordinator was identified as Mr. Ebersole on Page 1, and Mr. Lansink on Page 2. The list of emergency coordinators on Page 2 also included Mr. Netherton, who retired six months ago. The contingency plan did not include locations and capabilities for all emergency response equipment on Page 3 (for example, fire extinguishers and spill control kits), and did not include detailed descriptions of arrangements with local emergency response agencies or employee responses to fires, explosions, or spills. The plan included evacuation maps, but not a description of evacuation signals. Facility personnel were unsure if the contingency plan had been submitted to all local emergency response agencies. Based on my review, I concluded that Gomaco failed to maintain an adequate RCRA contingency plan, as required by 40 CFR 262.17(a)(6) referencing 262.260(a) (**NOPF No. 5**).

I asked Mr. Benner if Gomaco has prepared a quick reference guide. He stated that Gomaco did not have a quick reference guide. I concluded the facility failed to prepare a quick reference guide, as required by 40 CFR 262.17(a)(6) referencing 262.262(b)(2) through (b)(8) (**NOPF No. 6**).

During the CEI, I provided compliance assistance regarding the content of the RCRA contingency plan and quick reference guide.

8. Personnel Training Requirements

Personnel training is required by LQG regulations specified in 40 CFR 262.17(a)(7) to ensure that employees are thoroughly familiar with proper waste handling procedures relevant to their responsibilities. During the CEI, I asked Mr. Benner if hazardous waste training is provided to employees. He stated that hazardous waste management training is provided to all employees who handle hazardous waste within six weeks of hiring or being assigned to a job that handles hazardous waste. He also stated that annual refresher training is conducted. I asked Mr. Benner who conducts the training. He stated that all training is conducted by Gomaco personnel from another facility. Copies of training records for Machine Shop personnel for 2021, 2022, and 2023 along with the training program are included in Attachment 18 as examples of the training documentation maintained at the facility.

I reviewed the written job descriptions for a painter who moves the contents of the paint booth SAC to the distillation unit and noted that there is no written description of the type and amount of introductory and continuing training, as required by 40 CFR 262.17(a)(7)(iv)(C). (**NOPF No. 7**). A copy of the job description for a painter is included as Attachment 19.

9. Air Emissions

EPA regulations specified in 40 CFR Part 265, Subparts AA, BB, and CC applies to LQGs. If an LQG manages hazardous waste with an organic concentration greater than 10 parts per million by weight (ppmw), the standards found in Subpart AA apply to hazardous waste air emissions from certain process vents. A process vent used in distillation, fractionation, solvent extraction, thin-film evaporation, air stripping, or steam stripping is regulated by Subpart AA. Gomaco is

not subject to the Subpart AA regulations because the facility does not have any of the process vents listed above in contact with hazardous waste.

If an LQG has equipment that contains or contacts hazardous waste composed of 10 percent or greater organics by weight, the facility is subject to Subpart BB standards for inspection and monitoring of the equipment. Gomaco is not subject to the Subpart BB regulations because it does not have equipment that contains or comes in contact with hazardous waste with an organic content exceeding 10 percent.

The standards found in Subpart CC apply to LQGs that manage hazardous waste in containers with volatile organic compounds (VOC) concentration that exceeds 500 ppmw. Waste generated at the facility, including spent solvent and WPRM, have a VOC concentration that exceeds 500 ppmw at the point of generation. During the CEI at Gomaco, I therefore inspected the facility for the requirements of Subpart CC. Gomaco meets the Subpart CC requirements for containers by using Container Level 1 controls (containers smaller than 122 gallons that are Department of Transportation-approved). I did not note any deficiencies with regard to the facility's compliance with the Subpart CC requirements.

10. Summary of Preliminary Findings

In summary, as part of the CEI, I made the following preliminary findings:

- (1) Failure to label four hazardous waste satellite accumulation containers with the words "hazardous waste," as required by 40 CFR 262.15(a)(5)(i) (**NOPF No. 1**).
- (2) Failure to label four hazardous waste satellite accumulation containers with an indication of the nature of the hazard, as required by 40 CFR 262.15(a)(5)(ii) (**NOPF No. 2**).
- (3) Failure to label two universal waste lamps containers with the words "universal waste lamps" or "waste lamps" or "used lamps," as required by 40 CFR 273.14(e) (**NOPF No. 3**).
- (4) Failure to demonstrate length of time of accumulation for one universal waste lamps container, as required by 40 CFR 273.15(c) (**NOPF No. 4**).
- (5) Failure to maintain an adequate RCRA contingency plan, as required by 40 CFR 262.17(a)(6) referencing 262.260(a) (**NOPF No. 5**).
- (6) Failure to prepare a quick reference guide, as required by 40 CFR 262.17(a)(6) referencing 262.262(b)(2) through (b)(8) (**NOPF No. 6**).
- (7) Failure to prepare a written description of the type and amount of introductory and continuing training, as required by 40 CFR 262.17(a)(7)(iv)(C) (**NOPF No. 7**).
- (8) Failure to keep two hazardous waste satellite accumulation containers closed, as required by 40 CFR 262.15(a)(4) (**NOPF No. 8**).
- (9) Failure to make a waste determination on used paint booth filters, as required by 40 CFR 262.11 (**NOPF No. 9**).

NOPF Nos. 3, 4, 5, 8, and 9 are repeated findings from the previous inspection.

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

Clifford A.
Nelles

Digitally signed by Clifford
A. Nelles
Date: 2023.05.25
14:26:14 -05'00'

Date: _____

Clifford A. Nelles, Inspector
CLAENE Group

AMBER WHISNANT

Digitally signed by
AMBER WHISNANT
Date: 2023.06.07
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Date: _____

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

Attachments:

1. Notification Acknowledgement/Verification Report (2 pages)
2. Receipt for Documents and Samples (1 page)
3. Confidentiality Notice (1 page)
4. Notice of Preliminary Findings (2 pages)
5. Site Map (1 page)
6. Google Earth Aerial Photograph of Facility (1 page)
7. Photographic Documentation (Photolog and 19 Photographs) (13 pages)
8. 2021 Biennial Report (4 pages)
9. Copy of SDS for Methyl Ethyl Ketone (12 pages)
10. Copy of SDS for Buff High Solids URA-ZEN Primer (12 pages)
11. Copy of SDS for Yellow High Solids URA-ZEN (12 pages)
12. Copy of Solvent Reclamation Record Sheet (1 page)
13. Copy of Invoice from A-TEC Recycling dated February 9, 2023 (1 page)
14. Copy of SDS for 142 Solvent (12 pages)
15. Copy of Inspection Log from July 18, 2022 to March 27, 2023 (1 page)
16. Copy of Manifest and LDR for a shipment dated January 18, 2023 (2 pages)
17. Copy of Contingency Plan (14 pages)
18. Copy of Training Records for Machine Shop personnel (10 pages)
19. Copy of Job Description for Painter (1 page)