

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

VALMONT WEST POINT GALVANIZING

1700 S. Beemer Street
West Point, NE 68788
402-372-3706

EPA ID Number: NER000003251

On

September 11, 2024

By

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region 7

Enforcement and Compliance Assurance Division

1.0 INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division (ECAD), I conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Valmont West Point, located in West Point, Nebraska, on September 11, 2024. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. During the inspection, I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. This inspection report and attachments represent the results of the CEI.

2.0 PARTICIPANTS

Valmont West Point:

- Robert (Bert) Paulsen, Facility Manager (21 years with the company)
- Jeff Lackey, Operations Manager (6 years with the company)
- Paula Buresh, Human Resources/EHS Coordinator (2 years with the company)

EPA:

- Mark Holcomb, Civil Investigator/Inspector (SEE)

3.0 INSPECTION PROCEDURES

On September 11, 2024, I arrived unannounced at the facility's main office at about 1000 hours. Initially, I conducted a visual reconnaissance of the facility searching for areas of concern observable from the adjacent public roadways and parking lots. I identified no environmental issues or concerns during this preliminary examination. I entered the facility through the main office entrance. At the front desk, I introduced myself and asked for the manager responsible for

hazardous waste management. I was introduced to Mr. Paulsen, the Facility Manager, who escorted me to a conference room. There I met Mr. Jeff Lackey, the Operations Manager. Mr. Paulsen told me that the personal protective equipment required for my visual inspection at this facility was protective boots, eye protection, safety vest, helmet, and hearing protection in some areas.

At the opening conference, I presented my EPA ID and credentials to Mr. Paulsen and Mr. Lackey. I next explained the purpose and procedures of the inspection. I then presented Mr. Paulsen 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. They were made aware of their confidentiality rights, and I informed them that a Confidentiality Notice would be provided at the end of the inspection to make a confidentiality claim if they so desired. Mr. Paulsen and Mr. Lackey acted as the official facility representatives during the opening conference, visual inspection, and the exit conference. Ms. Buresh joined us during the document review and exit conference phases.

The CEI 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 and documents. I conducted a visual inspection of the following areas:

- Crystal Storage/Waste Storage - Central Accumulation Area (CAA)
- Quality Assurance (QA) Lab
- Reactor Room
- Zinc Bay
- West Lot

See Attachment #1 for the aerial/map views and facility diagrams. Document photocopies and photographs were collected as inspection documentation (see Attachments #1-17 and Photos 1-8). The photo log is included as Attachment #2. Information collected during the inspection was documented on an Entry/Exit checklist and a hazardous waste compliance checklist. I reviewed documents including the following: safety data sheets (SDS), manifests, invoices, three-year eManifest report, 2023 biennial report, analytical testing reports, waste stream reports, contingency plan, staff training documents, and inspection checklists. I followed the inspection procedures detailed in the RCRA CEI Standard Operating Procedure 2321.01E unless noted otherwise.

At the conclusion of the inspection, I summarized my findings and recommendations with Mr. Paulsen, and Mr. Lackey. Ms. Buresh joined us for the document review and closing. I provided Mr. Paulsen with a Receipt for Documents (see Attachment #3), and a Confidentiality Notice (see Attachment #4), which he signed as an acknowledgment of receipt. No claim of confidential business information was made by Mr. Paulsen. At the time of the inspection, no preliminary findings were noted, and a Notice of Preliminary Findings (NOPF) form was not provided to Mr. Paulsen. I provided inspection and compliance assistance documents to Mr. Paulsen, which included the following:

- *RCRA Section 3007(a) (EPA Handout)*

- *Title 18 U.S. Code, Sections 1001 and 1002 (EPA Handout)*
- *Confidentiality Notice (yellow page of the completed carbonless transfer set)*
- *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA In Connection with Inspections (EPA Handout)*
- *Receipt for Documents and Samples (yellow page of the completed carbonless transfer set)*

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

Valmont West Point is located in West Point, Nebraska, and is operated by Valmont Industries Incorporated. Valmont Industries is a publicly traded company with over 11,000 employees worldwide in 21 countries and \$4.2B in sales in FY2023, with its corporate headquarters in Omaha, Nebraska. Valmont West Point started operations in 1997 and is located on 56 acres with one primary 300-foot x 100-foot (30,000 square feet) building (see Attachment #1 for a facility map). Valmont West Point operates with about 76 employees, utilizing two 8-hour shifts, Monday-Friday. This facility processes about 30 million pounds of steel each year. Mr. Paulsen stated that there had been no major changes in the last few years including no spills, fires, or other activations of their emergency plan since their last EPA RCRA inspection in 2019. At Valmont West Point, operations include custom galvanizing for the agriculture-related market. The facility performs hot dip galvanizing of fabricated steel parts received from various manufacturers. Mr. Paulsen stated that the steel is coated with zinc as a protective coating because zinc will sacrifice itself to corrosion before the steel. The hot dip galvanizing process consists of multiple large tanks and utilizes overhead cranes to move parts between tanks. The tanks consist of caustic tanks containing sodium hydroxide (an aid in removal of oil), a cold-water rinse tank (rinse aids in the removal of the caustic solution), pickling tanks of sulfuric acid (removal of scale and oxides), and cold-water rinse tanks (removal of residue pickling solution), a flux tank of hot ammonium chloride (removal of oxides and impurities), and galvanizing tanks of hot zinc and ammonium oxide. Mr. Paulsen stated that the Valmont West Point facility is noted for having one of the largest kettles in the country at 30 feet x 8.5 feet x 10 feet, allowing for extra-large structures to be galvanized without disassembly.

4.2 RCRA Status

Valmont West Point had been previously inspected by the EPA for RCRA compliance on March 13, 2019. The CEI report from that inspection indicated no findings. According to RCRAInfo, Valmont West Point had most recently notified as a large quantity generator (LQG) on February 16, 2024. I verified the facility address and the site contact information with Mr. Paulsen on the EPA RCRA Notification Acknowledgement Verification Report (see Attachment #5), with no changes made. Based on a review of recent uniform hazardous waste manifests, I determined that Valmont West Point routinely generates D001, D002, D006, D007, and D008 characteristic hazardous wastes. I determined the facility generates hazardous waste at the LQG level (greater than 1,000 kg or 2,200 pounds per month) and I inspected the facility as an LQG. In addition, I determined that the facility operates as a small quantity handler of universal waste and a generator of used oil.

4.3 Facility Waste Streams and Management

Valmont West Point generates the hazardous and non-hazardous wastes listed below. This information was obtained based on observations and statements made during the inspection. See Attachment #7 for Valmont West Point's waste management table.

Spent ARS (Acid) Filters - Valmont West Point generates about 2,000 pounds of spent acid recovery system (ARS) filters annually. Mr. Paulsen stated that the ARS reduces the amount of acid waste generated at the facility. The ARS has a filtering system that utilizes 24-inch, 100-micron polyester disposable filters. The spent ARS filters are accumulated in 55-gallon poly drums. The spent filters have been determined to be D002 characteristic hazardous waste. The spent ARS filters are picked up by Univar USA (Omaha, Nebraska) and shipped to Tradebe Treatment and Recycling (East Chicago, Illinois), for H141 management (storage, bulking, or transfer off-site). A review of the hazardous waste manifests indicates the most recent shipments of this waste (referred to as "Waste Corrosive Liquid, Acidic, Sulfuric Acid") on May 16, 2024, for 550 pounds, December 7, 2023, for 455 pounds, and May 25, 2023, for 195 pounds (see Attachment #6 for the May 16, 2024, uniform hazardous waste manifest). The 2023 Biennial Report indicates a total of 1,662 pounds of this waste stream was shipped in 2023. During the visual inspection, I observed one full 55-gallon blue poly drum of acid filters in the CAA Crystal/Waste Storage Room. The hazardous waste storage drum (less than 90 day hazardous waste accumulation container) was closed, in good condition, labeled with the words "Hazardous Waste," and marked with an accumulation start date of less than 90 days (see Photo 3). Photo 4 is a closeup of the hazardous waste drum from the previous photo. Mr. Paulsen stated that they use a temporary 8x11-inch text label initially and then later add the computer-generated label provided by the transport company just before transport. The temporary label stated the nature of the contents (Acid Filters), the accumulation start date, and the words "Hazardous Waste" in small font in the body of the printed label. For best management practices, I recommended that Valmont West Point use a larger "Hazardous Waste" label that can be more easily read from a distance.

Acid Tank Bottom Solids - Valmont West Point generated 18,041 pounds last year of what was termed "Acid Bottom Sludge" in the 2023 Biennial Report. The acid tank bottom solids are from the sulfuric acid tank clean-outs and were determined to be D002, D007, and D008 hazardous waste (see Attachment #11 for the analytical report). Three sulfuric acid tanks are cleaned about every three years or one tank annually. The generation rate is approximately 6,000 pounds per clean-out and is accumulated in 55-gallon poly drums. The acid tank bottom solids are picked up by Univar USA, Inc. and shipped to Tradebe Treatment and Recycling (East Chicago, Illinois) for disposal.

Caustic Tank Bottom Solids - Valmont West Point generates caustic tank bottom solids from the clean-out of the sodium hydroxide caustic dip tank. Mr. Paulsen stated that the caustic tank generally is cleaned out annually. Mr. Paulsen stated that the caustic tank bottom solids have been determined by analysis to be non-hazardous and the generation rate

is approximately 2,500 pounds per clean-out (see Attachment #10 for an analytical report). The caustic tank bottom solids are accumulated in 55-gallon poly drums. The caustic tank bottoms are picked up by West Point Sanitation with landfill disposal (see Attachment #9 for bill of lading of tank bottom sludge dated March 15, 2023).

Flux Tank Bottom Solids - Flux tank bottom solids are generated from the clean-out of the zinc ammonium chloride flux tank. Mr. Paulsen stated that the flux tank has not been cleaned out for several years and it is rare to need a clean-out. Mr. Paulsen stated that the flux tank bottom solids have been determined by analysis to be non-hazardous in the past and the generation rate is approximately 2,500 pounds per clean-out. Mr. Paulsen stated that a new analysis will be performed when a clean-out occurs. The flux tank bottom solids are accumulated in 55-gallon poly drums. The flux tank bottom solids are picked up by Univar USA, Inc. shipped to Tradebe Treatment and Recycling (East Chicago, Illinois), and disposed of. Mr. Paulsen stated that the reason the flux tank had not been cleaned out for several years was because of a continuous filtration unit that circulates the zinc ammonium chloride flux through a filter press located in the pit below the tank.

Filter Press Flux Solids - Iron oxide filter press flux solids are generated from a continuous filtration unit filter press located in the pit below the zinc ammonium chloride flux tank. The generation rate is approximately 3,000 pounds per year and the filter press flux solids are accumulated in 55-gallon poly drums. Mr. Paulsen stated that the filter press flux solids have been determined by analysis to be non-hazardous. The filter press flux solids are picked up by Univar USA (Omaha, Nebraska) and shipped to Tradebe Treatment and Recycling (East Chicago, Illinois) for disposal.

Zinc Dross - Zinc dross is generated from the clean-out of the zinc kettle. The zinc dross is collected from the bottom of the kettle. The generation rate for the zinc dross is approximately 15,000 pounds per month or about 36,000 pounds per truckload. Mr. Paulsen stated that the zinc dross has been determined by analysis to be non-hazardous. The zinc dross is accumulated in 55-gallon steel drums and sold to U.S. Zinc (Houston, Texas).

Zinc Skims and Burnt Skims - Zinc skims are collected from the top of the zinc kettle by collecting them into burn barrels. The zinc is reclaimed from the zinc skims at an on-site metal zinc reclamation unit that generates reclaimed zinc. The reclaimed zinc is formed into ingots and reused in the process and the burnt skims are collected in 55-gallon steel drums. The generation rate for the burnt skims is approximately 800 pounds every three days. Mr. Paulsen stated that the burnt skims have been determined by analysis to be non-hazardous (see Attachment #8 for the SDS) and sold to U.S. Zinc (Houston, Texas).

Zinc Iron Sulfate Salt (ARS) Crystals - Valmont West Point generates approximately 2,600 pounds of zinc iron sulfate crystals per day. The zinc iron sulfate crystals are accumulated in open-top steel hoppers in the Crystal/Waste Storage area (see Photo 5). The ARS removes impurities from the sulfuric acid dip tank solution and generates a zinc iron sulfate crystal product upon cooling the filtered acid solution. Mr. Paulsen stated that the zinc iron sulfate crystals have been determined by analysis to be non-hazardous and are managed as a co-

product (see Attachment #8 for the SDS). The zinc iron sulfate crystals are sold to SEM Minerals (Quincy, Illinois), for use in the production of livestock feed supplements.

Waste Paint Related Material - Valmont West Point generates less than 20 gallons of waste paint per year from partially spent aerosol cans of gray zinc touch-up paint. The aerosol cans are punctured and drained, and the waste paint is collected in a 55-gallon drum. The waste paint is determined to be D001 characteristic hazardous waste. Mr. Paulsen stated that the aerosol cans are mostly RCRA empty when punctured. Mr. Paulsen stated that the 55-gallon hazardous waste satellite drum has been at this location for several years and estimated that one 55-gallon drum would be generated every two to three years. Mr. Paulsen stated that when the container becomes full it will be picked up by Univar USA (Omaha, Nebraska) and shipped to Tradebe Treatment and Recycling (East Chicago, Illinois), and disposed of. I observed an aerosol can puncturing device in the Zinc Bay. The waste paint was collected in the black 55-gallon drum (about 1/2 full) and the punctured and drained aerosol cans were collected in the silver drum as scrap metal. The hazardous waste satellite accumulation drum was closed, in good condition, and labeled with the words "Hazardous Waste" and "Flammable" (see Photo 7).

Spent Lamps - Mr. Paulsen stated that Valmont West Point has replaced all fluorescent, high intensity, mercury vapor, and metal halide lamps with LED lamps. Mr. Paulsen stated that there were no spent lamps on site. I observed no spent lamps in storage during the visual inspection.

Used Oil and Spent Oil Filters - Valmont West Point generates about 65 gallons of used oil annually from preventive maintenance of seven overhead cranes and about seven used oil filters per year. Mr. Paulsen stated that the five forklifts are leased, and the maintenance is outsourced for the forklifts, air compressor, and generator. The used oil is collected in 55-gallon drums and stored in the CAA. Mr. Paulsen stated that the used oil is recycled by Jebro Oil located in Sioux City, Iowa. The used oil filters are punctured, hot drained, and disposed of in the general trash. I observed one empty black steel 55-gallon drum labeled as "Used Oil" in the CAA. The drum was in good condition with no obvious damage (see Photo 2). Mr. Paulsen stated that the used oil had recently been picked up and transported. I did not observe any spent used oil filters.

Lead-Acid Batteries - Valmont West Point generates approximately two lead-acid batteries per year. The spent lead-acid batteries are generated by the facility's forklifts and loaders and are managed per 40 CFR 266 Subpart G. Mr. Paulsen stated that spent lead-acid batteries are exchanged as cores for new batteries with local stores such as Arnold Motor Supply or Carquest Auto Parts (West Point, Nebraska). I observed no spent lead-acid batteries in storage during the visual inspection.

Spent Universal Waste Batteries - Valmont West Point generates a small (unspecified) number of spent Nickel-Cadmium batteries generated from maintenance operations. The spent batteries are stored in a closed five-gallon bucket and sent to their Valmont Valley

sister facility in Valley, Nebraska, for processing as universal waste. I observed no spent universal waste batteries or containers during the visual inspection.

Scrap Metal - Valmont West Point generates approximately 32,000 pounds per year of scrap metal from punctured aerosol zinc paint cans, steel banding, and steel hole cut-outs. The scrap metal is collected in steel collection containers located on the west lot of the main building (see Photo 8). The scrap metal is recycled by Roadrunner Iron and Metal (Grand Island, Nebraska) (see Attachment #13 for a list of all scrap metal shipments since 2022).

Wood Pallets - Mr. Paulsen stated that Valmont West Point generates about 5,000 pounds per quarter of wood pallets that are reused for shipping/handling of products. They are stored in the West Lot.

General Trash - The general trash consists of packaging waste, paper, cardboard, and office trash. Trash dumpsters are both four and six cubic yards and are located in the West Lot (see Photo 8). Mr. Paulsen stated that general trash is picked up once per week by S2 Roll-Offs, LLC (Freemont, Nebraska). See Attachment #12 for an invoice.

4.4 Other Areas Reviewed

Outside Facility Perimeter - I conducted a limited inspection of the outside perimeter of the facility and observed no hazardous waste storage tanks or containers except as noted above. The facility had a security fence surrounding the perimeter. See the aerial and map views in Attachment #1.

CAA - The CAA (Less Than 90-Day Hazardous Waste Accumulation Area) accumulates both non-hazardous waste and hazardous waste. Inside the CAA, I observed one 55-gallon blue poly drum of spent acid filters. The drum was closed, in good condition, labeled with the words “Hazardous Waste,” and marked with a date of less than 90 days (Photo 3-4). There were “No Smoking” signs, adequate spill kits, and fire control equipment. The room also had a fire sprinkler system. The staff communicates with company radios. See Photos 1-5. I also reviewed the past three years CAA Weekly Inspection checklists (see Attachment #17 for a completed checklist) with no issues noted.

Preparedness and Prevention - The facility has numerous fire extinguishers, spill kits, and eye wash stations. Mr. Paulsen provided a copy of the facility’s Contingency Plan. The plan appeared to be up-to-date and contained all the required components (see Attachment #14).

LQG Personnel Training - Mr. Paulsen stated that all staff with hazardous and universal waste handling responsibilities receive both initial and annual training. He provided documentation of their staff training (see Attachment #15 for a list of job titles and Attachment #16 for staff training sign-in sheets).

Uniform Hazardous Waste Manifests and Land Disposal Restrictions (LDR). I reviewed the e-manifest shipments, and 12 paper copies of manifests and LDRs over the previous three years. No issues were noted.

5.0 SUMMARY OF FINDINGS

No preliminary findings or compliance issues were observed at the time of the inspection. However, further EPA review may include findings.

MARK HOLCOMB
(Affiliate)
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HOLCOMB (Affiliate)
Date: 2024.11.01
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Mark Holcomb
Civil Investigator, SEE

AMBER WHISNANT
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Amber Whisnant
RCRA Section Chief, ECAD/Chemical Branch

Attachments:

- 1) Facility Aerial Map Views and Diagrams (5 pages)
- 2) Photo Log (8 photos and 9 pages)
- 3) Receipt for Documents (1 page)
- 4) Confidentiality Notice (1 page)
- 5) EPA RCRA Notification Acknowledgement/Verification Report (1 page)
- 6) Manifest 5.16.2024 (4 pages)
- 7) Waste Management Table (6 pages)
- 8) SDS – Ferrous Sulfate, Galvanizer Dry Skimmings (20 pages)
- 9) Bill of Lading (1 page)
- 10) Analytical Report – Caustic Bottom Sludge (10 pages)
- 11) Analytical Report – Acid Bottom Tank Sludge (10 pages)
- 12) Invoice – General Trash (1 page)
- 13) Scrap Metal List (1 page)
- 14) Emergency Action (Contingency) Plan (12 pages)
- 15) Job Titles (1 page)
- 16) Staff Training (3 pages)
- 17) 90-Day CAA Weekly Inspection Form (1 page)