

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

TITAN TIRE CORPORATION
2345 E. Market Street
Des Moines, Iowa 50317
515-265-9200 Installation Phone Number
515-265-9363 Site Contact Phone Number

EPA ID Number IAD005292750

On

March 29 & 30, 2022

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 Titan Tire in Des Moines, Iowa. The inspection was conducted on March 29 & 30, 2022. 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 Titan Tire as a very small quantity generator (VSQG) of known hazardous waste (HW), 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 13, 2007.

2.0 PARTICIPANTS

Titan Tire:

Brian Mills, Environmental Manager (17 years in current position)
Randy Freel, Tire Mechanic (32 years with company)
Matthew Wreck, Mechanic (19 years with company)

EPA:

Mark Holcomb, Civil Investigator (SEE) (Lead Inspector)
Trevor Urban, Environmental Scientist/Investigator (Training Preceptor)

3.0 INSPECTION PROCEDURES

On March 29, 2022, Trevor Urban and I arrived unannounced at the facility's main entrance at about 0900 hours. Initially I conducted a visual reconnaissance of the building/facility searching for areas of concern observable from the adjacent public roadway and parking lot. It is a large facility and not all areas were readily observable. I identified no environmental issues or concerns during this preliminary examination. Inside the front door, we met with the duty security officer. I introduced myself and I asked for Brian Mills, who is listed on our Notification Verification Report as the site contact (last updated in 2021). Mr. Mills quickly met us near Security. After introductions he escorted us to a conference room near his office. Mr. Mills stated that he had been with Titan Tire for over 17 years and was in the same environmental safety manager role during the previous inspection back in 2007. Mr. Mills told us there were currently no specific COVID-19 staff or visitor requirements and the only safety personal protective equipment (PPE) requirements at this facility were safety shoes, hearing protection, and protective glasses.

At the opening conference, I again introduced myself and presented my EPA ID. I also introduced my colleague Mr. Trevor Urban. I explained that I was the lead investigator, but I was also in training and that Mr. Urban was my trainer and our credentialed inspector. Mr. Urban presented his credentials. I explained the purpose and procedures of the inspection. I presented Mr. Mills with a copy of RCRA Section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented him with a copy of Title 18 U.S. Code, Sections 1001 and 1002. I made him aware of his confidentiality rights and informed him that a Confidentiality Notice would be provided at the end of the inspection to make a confidentiality claim if he 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. Mr. Mills was present throughout the entire inspection including the visual inspection. Mr. Mills was also present for the opening and exit conferences.

I conducted a visual inspection of the following:

- Basement level near rubber mixer #4
- Bldg 28 Tire Assembly Area between 103 & 105
- Tire Assembly Machine X80 Bldg 28
- Large Tire Assembly Area
- Maintenance Mold Repair Area
- Tire Wheel Assembly Area
- Forklift Maintenance Area
- Central Accumulation Area (CAA)
- Green Cage part of CAA
- Just North of the CAA – Oil/Water Skimmer

See Attachments #1 and #2 for the aerial view and facility diagram (some of the photo locations are indicated by circled numbers on the facility diagram)

Document Photocopies and Photographs were collected as inspection documentation (see Attachments #1-17 and Photos 1-23). Photo 4 is not referenced in this report. The photo log is included in Attachment #3. Information collected during the inspection is documented on an Entry/Exit checklist, the hazardous waste compliance checklists and in a notebook. I reviewed documents including the following: Safety Data Sheets (SDS); bills of lading; certificates of recycling; waste profiles; and manifests.

The following morning on March 30, 2022, I held a closing conference. Participants included Mr. Mills, and Trevor Urban. I provided Mr. Mills with a Receipt for Documents (see 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. Mills 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, some as paper versions and some in electronic PDF via email, 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) 2321.01D, unless noted otherwise.

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

Mr. Mills stated that this facility location began operations back in the 1930's under several different tire manufactures, and Titan Tire acquired the facility in 1994. Titan Tire has approximately 500 employees operating seven days a week, 24 hours per day in three eight hour shifts per day. The facility is approximately 2,000,000 square feet. The owner of the facility is Titan Tire International based in Quincy, Illinois. See Attachment #1 for the facility aerial view and map location. See Attachment #2 for a facility diagram and see Photo 1 for an outside view of the facility from the northeast corner facing East. Titan Tire is dedicated to the manufacturing of large specialty tires for off-road, construction, mining, and industrial vehicles under its own and Goodyear labels. Photo 6 is an example of the large tire assembly area. Raw materials used include rubber, oils, heptane, steel and poly fiber, and other miscellaneous materials. In general, the tire manufacturing process includes: mixing raw materials, stacking, calendering (process of smoothing and compressing the rubber by passing a single continuous sheet through a number of pairs of rollers), extruding, cutting, building and curing, and then inspecting.

4.2 Facility RCRA Status

RCRAInfo lists a previous RCRA compliance inspection for Titan Tire, conducted on June 13, 2007. The inspection report listed two NOPFs:

1. Failure to label one container of used oil with "Used Oil"
2. Failure to implement a system to demonstrate length of time of universal waste storage

According to the RCRAInfo Notification Acknowledgement/Verification Report, Titan Tire last notified as a Small Quantity Generator (SQG) on August 11, 2021. I provided Mr. Mills with the Notification Acknowledgement/Verification form, which he reviewed and returned without any changes (see Attachment #7). The RCRAInfo Notification Acknowledgement/Verification form report indicates they generated D001, D002, D003, D005, D006, D007, D008, D018, D035, and F003, F005, and U239 waste codes. I determined Titan Tire to be a very small quantity generator (VSQG) of hazardous waste (less than 220 pounds, or 100 kg, of non-acute hazardous waste generated per month), based on the facility's hazardous waste generation rate at the time of the inspection. In addition, I determined Titan Tire to be a small quantity handler of universal waste lamps and batteries, as well as used oil. Mr. Mills stated he preferred to maintain his standards as a SQG due to occasional larger generations. The e-Manifest report showed four hazardous waste streams shipped over the last 18 months for a total of 699 lbs. Additionally, Mr. Mills stated that two of the four waste streams listed on the eManifest were for wastes that are no longer generated: waste adhesives (272 lbs on August 25, 2020) is no longer used in their process; and waste flammable liquids Silium/organo compound (34 lbs on August 25, 2020) was a trial product that they also discontinued. It appears that Heptane is their primary hazardous waste, and its generation rate is in the 20-25

lbs per month range. Note - this does not take into account the three pallets of miscellaneous paint cans and three drums of lead paint chips I identified in their CAA that were pending a waste determination.

4.3 Facility Waste Streams and Management

The following waste streams are managed by Titan Tire:

Waste Heptane – Heptane is used in the tire manufacturing process to make the rubber sticky and promote adhesion as more layers of rubber are applied. Photo 5 shows a good example of the heptane use. The worker on the Tire Assembly Machine uses the red handled brush located in the heptane can (about one-quart size) showed by the red arrow, to apply heptane to the rubber as it is rolling. The brush contaminates the heptane in the one-quart can from continuous use and the contaminated heptane must be replaced with new heptane several times a month. The worker then occasionally hand carries the spent Heptane in the one-quart can to the 55-gallon drum in Photo 3. Titan Tire has determined this waste to be a D001 characteristic hazardous waste based on product and process knowledge. See Attachment #10 for the heptane Safety Data Sheet (SDS). Mr. Mills stated that he estimates the generation rate at about 20 lbs per months. A recent paper manifest, not on the eManifest, is Attachment #8, which shows 88 lbs of heptane shipped on March 11, 2022 (only 17 days prior to my inspection). Additional manifests, also in Attachment #8, are May 11, 2021, for one drum of Heptane at 167 lbs, August 25, 2020, for one drum of heptane at 204 lbs, and February 28, 2020, one drum of heptane listed as 50 gallons (no weight documented). Onsite management of the heptane is as noted above in Photo 5 showing that the workers place the spent heptane into one of two 55-gallon satellite accumulation area (SAA) containers. I noted that each SAA covered a large area of roughly 20,000 square feet (100 x 200 ft), which may not meet the definition of a SAA, but this is not a requirement for VSQG. The lid on the fill funnel on top of the 55-gallon drum in Photo 3, was not fully closed and secured, but also not a requirement for VSQG. The 55-gallon SAA container for the heptane had an accumulation date of February 17, 2022, which was about a month prior to my inspection. Both SAA drums appeared to be close to empty or less than a ½ inch of fluid in the drums, which emphasizes the relatively slow accumulation rate. Mr. Mills stated that every six months the drums are shipped by Heritage Crystal Clean to Petro-Chem Processing Group in Detroit Michigan for H061 processing (fuel blending prior to burning).

Waste Xylene UN1307 – Mr. Mills stated that he was not familiar with the details of the generation of the waste xylene and thought that it may be used by maintenance, but it is generated in very small volumes. Titan Tires classifies it as a hazardous waste based on product knowledge and use listing waste codes D001 for ignitability and D018 and U239 for benzene. The most recent, and only manifest for this waste was August 25, 2020 (Attachment #8) for a total of 21 lbs. I did not see any containers or use of xylene during the visual inspection. The August 25, 2020, shipment was by Heritage Crystal Clean and was shipped to Heritage Environmental Services in Indianapolis, Indiana for H061 processing (fuel blending prior to burning).

Waste Adhesives UN1133 – Mr. Mills stated that the waste adhesives were previously used in the tire manufacturing process, but its use was discontinued in 2020. Titan Tire had determined this waste to be hazardous based on product knowledge. It had been designated waste

code D001 for ignitability. The last shipment of this waste was August 25, 2020 (see Manifest in Attachment #8) for one drum at 273 lbs. The August 25, 2020, shipment was by Heritage Crystal Clean and was shipped to Heritage Environmental Services in Indianapolis, Indiana for H141 processing (incineration).

Waste Flammable Liquid Silium Organocompound UN1193 - Mr. Mills stated that this waste was a trial product that was previously tested out in the tire manufacturing process, but its use was discontinued in 2020. Titan Tire had determined this waste to be hazardous based on product knowledge. It had been designated waste code D001 for ignitability. The last shipment of this waste was August 25, 2020 (see Manifest in Attachment #8), for one drum at 34 lbs. The August 25, 2020, shipment was by Heritage Crystal Clean and was shipped to Heritage Environmental Services in Indianapolis, Indiana for H141 processing (incineration). There is none of this waste or product remaining at this facility since its use had been discontinued.

Waste Isopropyl Alcohol UN1219 - Mr. Mills stated that isopropanol was previously used in the tire manufacturing process, but its use was discontinued recently. They are no longer using the process that generated the waste isopropanol. Titan Tire had determined this waste to be hazardous based on product knowledge. It had been designated waste code D001 for ignitability. The last shipment of this waste was March 11, 2022 (see Manifest in Attachment #8) for one drum at 338 lbs. The previous shipment was on January 13, 2020, which was two drums at 900 lbs. The waste was transported by Heritage Crystal Clean and was shipped to Heritage Environmental Services in Indianapolis, Indiana for processing. There is none of this waste or product remaining at this facility since its use had also been discontinued.

Printing Waste Ink - Mr. Mills stated that printing ink is used to mark the rubber coming off the calender (a large industrial roller) – much like a large ink jet printer, and the waste is generated in very small volumes. The only waste is if the ink container becomes clogged or expired. Titan Tires classifies it as a hazardous waste based on product knowledge and use waste codes D001 for ignitability and D035 (MEK). Mr. Mills did not have any shipment manifests or SDS for this waste, but he estimated that they generate only about 10 lbs per year. During the visual inspection I did see the industrial size printers in use, but I did not see any containers of waste ink. Mr. Mills stated that onsite storage of the waste is in 5-gallon containers kept in the CAA and that it is shipped annually by Heritage Crystal Clean and was shipped to Heritage Environmental Services in Indianapolis, Indiana, for processing.

Baghouse Dust – Mr. Mills stated that this waste dust is generated by large dust collectors. It is determined to be non-hazardous based on Toxicity Characteristic Leaching Procedure (TCLP) testing by Keystone Laboratories in Newton, Iowa (see Attachment #13 for the analytical report). Titan Tire also has a Special Waste Permit from the Metro Waste Authority to generate and dispose of this waste (see Attachment #15), which indicates a total quantity of 500 lbs per quarter. The hauler is Waste Connections, and it is transported to the Metro Park East Landfill in Mitchellville, Iowa.

Mill Sludge AKA: (Partially Mixed Rubber and Absorbent) - Mr. Mills stated that the waste Mill Sludge is generated by processes involved in mixing the rubber. During mixing the product becomes a mixture of non-pumpable solid rubber and a part liquid mixture. Prior to separating, the single waste stream is determined to be non-hazardous due to product and process knowledge. The semi-liquid component is drained off into 55-gallon drums. An absorbant is added and it separates into two waste components: 1) waste oil (which is another waste stream discussed separately), and 2) Mill Sludge (this waste stream). The Mill Sludge is determined to be non-hazardous based on Toxicity Characteristic Leaching Procedure (TCLP) testing by Keystone Laboratories in Newton, Iowa (see Attachment #14 for the analytical report). Titan Tire also has a Special Waste Permit from the Metro Waste Authority to generate and dispose of this waste (see Attachment #15 – page 2), which indicates a total quantity of 66 tons. The waste Mill Sludge is stored in 55-gallon drums. During the visual inspection I observed twenty 55-gallon drums of Mill Sludge stored in the CAA (see Photos 12 & 13). The steel drums were closed, appeared to be in good condition, and labeled with “Mill Sludge”. The Mill Sludge drums are transported by Waste Connections to the Metro Park East Landfill in Mitchellville, Iowa.

Waste Oil – Waste oil is the second waste stream generated along with the Mill Sludge mentioned in the previous waste stream process. Mr. Mills stated that a major amount of the waste oil is generated by processes involved in mixing the rubber. During mixing the product becomes a mixture of non-pumpable solid rubber and a part semi-liquid mixture. The semi-liquid component is drained off into 55-gallon drums. An absorbant is added and it separates into two waste components: 1) waste oil (this waste stream), and 2) Mill Sludge (waste stream discussed earlier). The waste oil is determined to be non-hazardous based on product and process knowledge and is managed under 40 CFR 279 used oil. Mr. Mills estimates Titan Tire waste oil generation rate is approximately 25 drums every two months. On March 10, 2022, 700 gallons was shipped by Jebro Inc. from Sioux City, Iowa (see Attachment #9 for the Bill of Lading) for recycling. During the visual inspection I observed eight 55-gallon drums and one 280-gallon poly tote of waste oil stored in the CAA (see Photos 12 & 13). These drums and container were all in good condition and labeled as “Used Oil”. On the basement level near Rubber Mixer #4, I observed a 55-gallon blue steel drum, currently receiving waste oil via piping from the Rubber Mixer above it. The 55-gallon blue steel drum was about 1/3 full, in good condition and was not labeled as “Used Oil” (see Photo 2). In the area just north of the CAA, I observed two blue 55-gallon steel drums connected to an oil/water skimmer, collecting waste oil from the floor scrubber process noted below in the wastewater waste stream. Both drums appeared to be in good condition, closed, and labeled with “Used Oil” (see Photos 22 & 23).

- **NOPF 2 - Failure to label used oil containers as “Used Oil” as required in 40 CFR 279.22(c)(1).**

Used Oil - Mr. Mills stated that the used oil waste stream is generated as part of the forklift oil change maintenance process. In the Maintenance Area I observed a black 55-gallon steel drum for used oil collected from forklift maintenance (see Photo 9 and 10). The yellow plastic tray on top is used to drain oil filters. The drum appears to be ½ full and in good condition. I did not see a Used Oil label on the drum. Mr. Mills stated that the used oil generated from the forklift oil

change maintenance process is combined with the waste oil stream from the rubber generation process described above in the “Waste Oil” waste stream. As noted in the previous waste oil waste stream, the waste/used oil is determined to be non-hazardous based on product and process knowledge and is managed under 40 CFR 279 used oil. Mr. Mills estimates Titan Tire waste oil generation rate is approximately 25 drums every two months. 700 gallons was shipped on March 10, 2022, by Jebro Inc. out of Sioux City, Iowa (see Attachment #9 for the Bill of Lading). It is important to note that this generation rate is for both the waste oil and used oil waste streams combined.

- **NOPF 2 - Failure to label used oil containers as “Used Oil” as required in 40 CFR 279.22(c)(1)**

Oil Filters – Mr. Mills stated that the oil filters are generated as part of the forklift oil change maintenance process. After removal the filters are placed on top of the used oil drum and allowed to drain for 24 hours. The oil filters are not punctured or crushed (see Photo 9 and 10). After draining they are thrown in the regular trash. I informed Mr. Mills that since the oil filters are not “hot-drained” by one of the methods listed in 40 CFR Section 261.4(b)(13), they do not meet the exclusion from the definition of a solid waste. I informed Mr. Mills that the used oil filters must be managed using one of the following methods to meet the exclusion: *puncturing and hot-draining; hot-draining and crushing; dismantling and hot-draining; or hot-draining by an equivalent method that removes used oil*. I determined the used oil filters do not meet the exclusion and therefore are still considered a solid waste and require a waste determination.

- **NOPF 1A - Failure to make a waste determination on the unpunctured Oil Filters as required in 40 CFR 262.11.**

Wastewater – Mr. Mills stated their plant has floor scrubbers that are used to clean the floors. The wastewater from this process is placed into skimmers that separate oil from the wastewater. He estimates that they skim an extra one 55-gallon drum per year of oil to add to the waste oil stream (see Photos 22 & 23). The waste oil from the skimmers is contained in 55-gallon drums and “sucked up” by Jebro Inc., out of Sioux City, Iowa, when they collect the other used oil, and it all goes into the same truck load. The remaining wastewater is discharged into the sanitary sewer system and is determined to be non-hazardous based on monthly testing of discharge water samples by the Wastewater Reclamation Authority. Titan Tire has a Wastewater Discharge Permit from the Des Moines Metropolitan Wastewater Reclamation Authority current through July 1, 2023 (see Attachment #17). Mr. Mills was not sure of the water volume generated but said the Wastewater Authority keeps close tabs on the volumes and daily effluent limitations.

Aerosol Paint Cans – Mr. Mills stated that aerosol paint cans are used occasionally in tire assembly for rim touchup painting. Titan Tire estimates their generation rate of empty aerosol cans to be one to two 55-gallon drums per year. The empty cans are not punctured. During the visual inspection, I observed a blue 55-gallon drum with a four-inch hole cut in the top (see Photo 8). The drum is labeled as “Waste Aerosol Cans” and “Universal Waste” with an accumulation start date of “2/7/2022”. The drum was approximately ¼ full and in good

condition. When full the drums are moved to the CAA and then collected by Rinco and transported to Rinco in Bento, Arkansas for recycling.

Spent Universal Waste Lamps – Titan Tire generates several spent Universal Waste lamps during their switch over to LED lamps. They are currently about 80% LED and 20% fluorescent. Their November 2, 2021, recycling certification document indicated they shipped 287 eight-foot and four-foot spent lamps. During the visual inspection of the CAA, I observed one full round fiberboard container (4-foot x 2-foot) and one full eight-foot round container of waste lamps. The fiberboard containers were closed and in good condition, with accumulation start date of “8/17/2021” (less than one year). It was labeled “Universal Waste Lamps” (see Photo 14). The waste lamps are collected and shipped quarterly by A-TEC Recycling in Des Moines, Iowa (see Attachment #16 for Recycling Certification).

e-Waste Electronics/Batteries – Titan Tire generates various electronics and batteries. Their A-Tec Certificate of Recycling for November 2, 2021, listed the following:

- ✓ 45.9 lbs CPU/Servers
- ✓ 109.6 lbs Misc Electronics
- ✓ 59.5 lbs Computer Monitors/TVs
- ✓ 103.1 lbs Batteries- lead acid

See Attachment #16 for the A-TEC Recycling certification. During the visual inspection of the CAA, I observed two UPS (Uninterrupted Power Supply) batteries, plastic wrapped on a wooden pallet ready for shipping. I also observed three 55-gallon full drums of various electronics in the CAA (see Photos 11 and 15). There are five spent lead-acid batteries (from forklifts) on the left pallet in Photo 15 that they do core exchanges with under 266 Subpart G. The e-wastes are collected and shipped quarterly (last shipped on November 2, 2021) by A-TEC Recycling in Des Moines, Iowa.

Final Finishing Tire Paint – Mr. Mills stated that the final finish paint is used in the finishing part of the tire/wheel assembly process. It only ends up as waste if it is off-spec or expired. Mr. Mills stated that Titan Tire generates about one 55-gallon drum of final finish tire paint per year. The waste determination is as non-hazardous based on product knowledge. Mr. Mill provided me with a SDS and it is called Rhenodiv FP-444 (see Attachment #11 for the SDS). Onsite it is containerized upon generation and shipped off-site by Rinco in Benton, Arkansas.

Inside Tire Paint – Mr. Mills stated that the inside tire paint is used in the finishing part of the tire/wheel assembly process. It only ends up as waste if it is off-spec or expired. Mr. Mills stated that Titan Tire generates about one 55-gallon drum of tire paint per year. The waste determination is as non-hazardous based on product knowledge. On the SDS it is called SEM-DDW4 and described as an inside tire lube silicon emulsion (see Attachment #12 for the SDS). Onsite it is containerized upon generation and shipped off-site by Rinco in Benton, Arkansas.

Miscellaneous Cans of Paint Waste – I observed three wooden pallets of misc paints in the CAA. Mr. Mills stated that they were from a “clean out” several months ago and there has not been a waste determination made on them. Mr. Mills estimates they have been in the CAA for about three months (since January 2022). Volumes remaining in the cans appeared to vary

significantly with most being less than ½ full. See Photos: 16, 18, 19, 20, 21. The estimated contents include:

- ✓ 45-50 one-gallon paint cans
 - ✓ 2 five-gallon cans
 - ✓ 35 aerosol cans
 - ✓ A 12 X 10-inch box of a several dozen small plastic bottles
- **NOPF 1C -Failure to make waste determinations on: Three pallets of one quart, one-gallon, five-gallon containers of enamels, latex, oil-based paints in CAA as required in 40 CFR 262.11.**

Lead Paint Chips – I observed three, full, 55-gallon drums (two steel and one poly) shrink-wrapped together, with the only label being a handwritten “Lead Paint” on the plastic wrap in the CAA (see Photo 17). Mr. Mills stated they contained “lead paint chips” from a paint job in an older part of the plant (the plant first started operations back in the 1930s). The paint chips were generated by scraping the old paint off the walls and metal structures prior to being repainted. Mr. Mills stated that he estimates they have been in the CAA for “about one year” and there has not been a waste determination made on them. The drums are closed and appear to be in good condition.

- **NOPF 1B - Failure to make waste determinations on: Lead paint waste chips in three 55-gallon drums in CAA as required in 40 CFR 262.11.**

Shop Disposable Cloth Rags – Mr. Mills stated that they use disposable cloth rags to wipe off oil and grease. I confirmed with two of their mechanics, Randy Freel – Tire Mechanic for 32 years, and Matthew Wreck, Mechanic for 19 years, that they do not use any solvents – they stated that they only use WD40 and lubricating/cutting oil. They make sure the rags are not soaked and contain no free liquids. Mr. Mills estimated Titan Tire generates one to two dozen used rags per day. Mr. Mills stated that the rags, when generated, are collected daily and disposed of in the general trash. Their waste determination is that they are non-hazardous based on process and product knowledge. At the time of the visual inspection, I observed one red 20-gallon waste step can in the Maintenance Mold Repair Area, about ½ full of rags (see Photo 7). The rags appeared dry to touch.

General Trash – General trash is generated by routine operations. Mr. Mills stated the trash consists of paper and plastic shipping wastes and food containers from employees and that it is non-hazardous. Their general trash is collected weekly and transported to the local landfill.

4.4 Other Regulatory Requirements

Outside Facility Perimeter - I did a limited inspection of the outside perimeter of the facility and observed no hazardous waste storage tanks, containers, or other stored waste. The Titan Tire building is a large two million square foot structure. I did observe security fencing. They also have onsite 24/7 security. They have two large 5000-gallon above ground water tanks on the south side of the complex that Mr. Mills stated was part of their fire suppression system. See the aerial photo in Attachment #1.

Central Accumulation Area (CAA) – The CAA and is located in the southwest corner of the facility in Building #12. I did not ask about weekly inspections since this is not required for VSQG, but Mr. Mills did state that he does inspect the CAA at least weekly – I did review the January–March 2022 checklists. As noted above in the waste stream section, the CAA also contains three drums of “waste lead paint chips” and three palettes of “waste paint cans” that still require waste determinations. If these waste determinations come back as hazardous, the facility could become a SQG or LQG. See Photos: 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, and 21.

Preparedness and Prevention – Titan Tire has numerous fire extinguishers throughout the facility including a fire suppression system in the (CAA). I did not ask additional questions about a contingency plan, or weekly CAA inspections since this is not required for a VSQG.

Personnel Training – I did not ask specifically about staff hazardous waste training and training documentation since this is not required for a VSQG. Mr. Mills did state that his staff that handle universal waste have had “no formal training” on universal waste.

- **NOPF 3 - Failure to train employees responsible for managing of universal waste in proper handling and emergencies as required in 40 CFR 273.16**

5.0 SUMMARY OF FINDINGS

NOPF 1: Failure to make waste determinations, as required in 40 CFR 262.11, on:

- A) Oil Filters
- B) Lead paint waste chips in three 55-gallon containers in CAA
- C) Three pallets of one quart, one-gallon, five-gallon containers of enamels, latex, oil-based paints in CAA

NOPF 2: Failure to label used oil containers as “Used Oil” as required in 40 CFR 279.22(c)(1)

NOPF 3: Failure to train employees responsible for managing of universal waste in proper handling and emergencies as required in 40 CFR 273.16

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
(Affiliate)

 Digitally signed by MARK
HOLCOMB (Affiliate)
Date: 2022.05.27 12:49:53 -05'00'

Mark Holcomb
Civil Investigator

AMBER
WHISNANT

 Digitally signed by AMBER
WHISNANT
Date: 2022.06.03 18:59:55 -05'00'

Amber Whisnant
RCRA Section Chief, ECAD/CB