REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

IOWA STEEL AND WIRE CO., INC.
1500 West Van Buren St.
Centerville, Iowa 52544
(641) 954-4620

EPA RCRA ID No. IAD000156422

ON

February 16, 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 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 Iowa Steel and Wire Co., Inc. (Iowa Steel), at 1500 West Van Buren St., Centerville, 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, used oil, and universal waste requirements as applicable. This report and its attachments present the findings of the CEI.

PARTICIPANTS

Iowa Steel:

Cliff Jones, Human Resources Manager
Bill Zintz, General Manager

Toeroek Team:

William F, Starks, Environmental Consultant, (816) 286-6951

INSPECTION PROCEDURES

Prior to the CEI at Iowa Steel on February 16, 2023, I conducted a drive-by visual inspection. I did not observe any areas of concern during the drive-by. Upon my arrival, I entered the main entrance and explained the purpose of the CEI to Mr. Jones. After a brief introduction, Mr. Jones escorted me to a conference room where I conducted an entry briefing with him.

During the entry briefing, I presented my business card and EPA credentials to Mr. Jones. I explained the scope and procedures for the CEI. I explained the facility's right to make confidentiality claims and provided a Notice Regarding Proprietary/ Confidential Business Information. I stated that at the conclusion of the CEI, he would be presented with a Confidentiality Notice (Notice) with which he could make or not make a claim of confidentiality for the facility. I also provided Mr. Jones 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. Mr. Jones read both of these documents.

Following the entry briefing, Mr. Zintz joined the CEI. I provided him a copy of U.S. Federal Codes 1001 and 1002, which he read prior to continuing the CEI.

A copy of each of the following documents was left with the facility during the inspection:

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

I reviewed the Notification Acknowledgement/Verification Report (Verification Report) with Mr. Jones (Attachment 1). Based on this review, as well as observations during the CEI, I added D001 and D035 characteristic hazardous waste codes to the Description of Hazardous Waste section of the Verification Report. I made no other changes to the Verification Report.

I conducted the visual inspection and the records review on February 16, 2023, accompanied by Messrs. Jones and Zintz. During the records review, I reviewed facility documentation such as inventory reports, inspection records, RCRA Contingency Plan, training records, shipping

records, and hazardous waste determination records. I prepared and completed a site-specific inspection checklist to document my observations.

At the conclusion of the CEI on February 16, 2023, I conducted an exit briefing with Messrs. Jones and Zintz. During the exit briefing, I provided a Receipt for Documents and Samples, which Mr. Zintz signed, acknowledging receipt (Attachment 2). I provided Mr. Zintz the Notice, which he signed indicating no confidential business information had been provided (Attachment 3). I made no preliminary findings during the CEI, so a Notice of Preliminary Findings (NOPF) was not left with the facility at the conclusion of the CEI. However, I explained to Messrs. Jones and Zintz that findings might be added by EPA after review of the inspection report.

A diagram of the facility was obtained during the CEI and is in Attachment 4. An aerial photograph of the facility was downloaded after the CEI and is in Attachment 5. The 19 photographs taken during the CEI are included in Attachment 6, 18 of which are included in this report.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

Iowa Steel manufactures galvanized wire and concrete reinforcement mesh. Raw materials include carbon steel, hydrochloric acid, drawing lubes, and zinc and aluminum chloride flux. Iowa Steel is divided into eight main areas: Wire Operations, Galvanizing area, Fencing area, Hazardous Waste Tank area, Maintenance, Product Storage, Shipping/Receiving, and an office area. During the CEI, Mr. Zintz described the manufacturing processes performed at Iowa Steel.

In the Wire Operations area, steel rods are descaled and drawn to produce wire. This process generates mill scale waste and used soap. Mill scale waste (corrosion removed from steel rods) is considered nonhazardous waste and is shipped to Rosenman's, Inc. in Ottumwa, Iowa, for recycling. Dry soap is used as a lubricant during the drawing process. The used soap is considered nonhazardous waste and is sent to the South Central Iowa Solid Waste Agency (SCISWA) landfill in Tracy, Iowa. Wire to be galvanized is sent to the Galvanizing area.

In the Galvanizing area, wire is processed through a series of dip tanks. The wire is placed into a hydrochloric acid tank to etch the wire, followed by a rinsewater tank. After rinsing, the wire is placed in a flux tank containing zinc chloride and ammonium chloride. The wire is then dipped in a molten zinc tank to finish the galvanizing process.

Wastes from the galvanizing process include waste hydrochloric acid (spent pickle liquor), rinsewater, and waste flux solution. These wastes are generated during tank clean outs and are combined when transferred to one of two, 6,650-gallon hazardous waste aboveground accumulation tanks (AATs) in the Acid Storage Building. The waste is considered D002, D006, D007, and D008 characteristic; and K062 listed hazardous waste. The spent pickle liquor/rinsewater/flux solution hazardous waste is shipped to Vickery Environmental in Vickery, Ohio, for disposed via underground injection.

Other wastes generated from the galvanizing process include zinc skim and zinc dross. Zinc skim is generated from skimming impurities from the molten zinc tanks. Zinc dross is generated from cleaning the kettle. Zinc skim and zinc dross are transferred to a concrete pad in the southeast portion of the facility, and are shipped to Richker Metals in Chicago, Illinois, for recycling.

Scrap steel is primarily generated during production in the Fencing area. The Fencing area produces wire mesh for concrete, barbed wire, and field fence. Scrap metal is containerized and shipped to Rosenman's for recycling.

Maintenance activities generate used oil, used oil filters, waste batteries, and waste lamps. Used oil is generated from maintenance of drawing gear boxes and fork trucks. Used oil is managed as used oil per Title 40 *Code of Federal Regulations* (40 CFR) Part 279). Iowa Steel generates approximately 300 gallons of used oil annually during equipment and fork truck maintenance. Used oil is shipped to Heritage Crystal Clean in Des Moines, Iowa, for recycling.

Used oil filters are generated during onsite fork truck maintenance, and are managed as used oil per 40 CFR Part 279. Iowa Steel generates approximately 55 gallons of used oil filters annually. Used oil filters are shipped to Safety-Kleen Systems Inc. in Des Moines, Iowa, for recycling.

Waste batteries include lead-acid batteries (D008), lead paste batteries (D008), nickel-cadmium batteries (D006), and nonhazardous alkaline batteries. Suspected spent lead-acid batteries from fork trucks are transported to a local Interstate Battery dealer (Walker's Welding) for testing. If the battery test indicates the battery is spent, it is traded for a new battery. The waste lead acid battery is shipped for reclamation. Spent lead-acid batteries were not observed during the CEI, and not discussed further in the report.

Waste lead paste batteries (from facility emergency lighting) and waste nickel-cadmium batteries (from equipment maintenance) are managed as universal waste per 40 CFR Part 273. Waste alkaline batteries are also collected in the universal waste batteries accumulation container in the Maintenance area. Waste batteries are shipped to Veolia ES Technical Solutions in Port Washington, Wisconsin, for recycling.

Waste fluorescent lamps and waste high intensity discharge (HID) lamps are managed as universal waste per 40 CFR Part 273. Waste lamps are shipped to Veolia for recycling. The facility is currently converting existing lighting to liquid emitting diode (LED) lighting, and is approximately 80 percent complete with the project.

Maintenance activities also generate used aerosol cans, which are primarily empty. Used aerosol cans are collected in 55-gallon satellite accumulation containers (SACs) located throughout the facility. Used aerosol cans are punctured and drained into a 55-gallon SAC. Aerosol can residue is considered hazardous waste (D001), and punctured cans are managed as scrap metal.

General trash is generated during production and facility maintenance, and includes office-type refuse and other nonhazardous wastes. General trash is accumulated and transported to the SCISWA landfill in Tracy, Iowa, for disposal.

Iowa Steel has been in operation at its current location since 1990, with approximately 200,000 square feet under roof. The facility employs approximately 84 full-time personnel, who typically work one of three shifts (7:00 a.m. to 3:00 p.m., 3:00 p.m. to 11:00 p.m., or 11:00 p.m. to 7:00 a.m.) Monday through Friday. The facility also operates two, 10-hour shifts and two, 12-hour shifts in various departments. Iowa Steel personnel perform weekend work (Friday through Sunday) on 12-hour shifts. In addition, Iowa Steel personnel in the Hazardous Waste Tank area work every weekend.

On August 15, 2018, Iowa Steel was inspected by an EPA contractor. Following the CEI, the inspector left the following preliminary findings:

- Failure to close three universal waste lamp accumulation containers, as required by 40 CFR 273.13(d)(1)
- Failure to label hazardous waste satellite accumulation container with an indication of the nature of the hazard, as required by 40 CFR 262.15(a)(5)(ii)

These findings were not repeated during this inspection.

2. RCRA Status

Iowa Steel was 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 confirmed Iowa Steel's status as a LQG through a review of current operations, interviews with Messrs. Zintz and Jones, and a review of waste disposal records (manifests).

During the CEI, I reviewed copies of the hazardous waste manifests for shipments of spent pickle liquor/rinsewater/flux solution from February 20, 2020 through February 15, 2023. I noted that the quantity of spent pickle liquor/rinsewater/flux solution shipped offsite is relatively consistent, with shipments occurring approximately every two to three weeks at 4,600 to 5,050 gallons per shipment. Per Mr. Zintz, spent pickle liquor/rinsewater/flux solution weighs approximately 9.21 pounds per gallon. Therefore, I estimated the facility generates approximately 42,366 to 46,510 pounds (19,217 to 21,097 kg) of spent pickle liquor/rinsewater/flux solution every two to three weeks. I also reviewed the facility's 2021 Hazardous Waste Biennial Report prior to the CEI. Per the biennial report, the facility shipped 1,178,680 pounds (534,640 kg) of spent pickle liquor/rinsewater/flux solution in 2021. I determined the generation rate for spent pickle liquor/rinsewater/flux solution easily exceeds the LQG threshold of 1,000 kg per month, and inspected the facility as such.

I also reviewed copies of shipping documents for universal waste lamps and batteries dated September 17, 2019 through February 7, 2023. Based on these documents, it appears that Iowa Steel generates approximately 150 universal waste lamps and approximately 5 gallons of universal waste batteries per year. Therefore, I inspected Iowa Steel as a SQH of universal waste (accumulating less than 5,000 kilograms [kg] of universal waste at any time). Iowa Steel is also a generator of used oil.

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 ultimate disposition. The following discussion of waste streams is based on my interviews with Messrs. Jones and Zintz, the visual inspection, and my review of available documentation.

Spent pickle liquor/rinsewater/flux solution is generated when solutions in the hydrochloric acid, rinsewater, and flux tanks are changed out when they become spent. The wastes are transferred into one of two, 6,650-gallon hazardous waste AATs. The facility considers the combined waste (spent pickle liquor/rinsewater/flux solution) to be hazardous waste (D002, D006, D007, and D008 characteristic; and K062 listed hazardous waste) based on process/product knowledge and testing. The facility generates approximately 98,000 pounds of spent pickle liquor/rinsewater/flux solution per month. The waste is collected by Vickery Transportation Inc. and transported to Vickery Environmental in Vickery, Ohio, for disposal via an underground injection well.

I obtained a copy of a Eurofins TestAmerica Analytical Report, dated October 7, 2021, during the CEI (Attachment 7). The report includes analytical results for 16 waste streams generated at Iowa Steel, including spent pickle liquor/rinsewater/flux solution (identified as spent acid and flux-waste). Spent pickle liquor/rinsewater/flux solution was analyzed for total metals, toxicity characteristic leaching procedure (TCLP) metals, and pH. Based on the analytical report and the definition of K062 listed waste, the hazardous waste determination for spent pickle liquor/rinsewater/flux solution appears to be adequate.

Mr. Jones, Mr. Zintz, and I went to the hazardous waste tank area in the Acid Storage Building. Mr. Zintz stated that the area consists of three aboveground tanks within a containment area. One tank contains hydrochloric acid product. The other two tanks (Tank No. 1 and Tank No. 2) are 6,650-gallon hazardous waste AATs. Mr. Zintz stated the two, double-walled polyethylene hazardous waste AATs were installed in 2014.

I observed the two, 6,650-gallon hazardous waste AATs during the CEI. The AATs appeared to be structurally sound and compatible with the waste. Both AATs were labeled with the words "hazardous waste" and an indication of the nature of the hazard (Attachment 6, Photographs 8 through 10 and 12).

The two AATs were located within the same secondary containment structure. The secondary containment structure appeared to be constructed of impervious material compatible with the waste, and appeared to be capable of containing 6,650 gallons. The secondary containment structure showed no evidence of leaks and appeared to be structurally sound (Attachment 6, Photographs 13 and 14). I noted some staining in drip pans and on adjacent secondary containment floor, but no free liquids. Mr. Zintz stated that staining is from occasional drips and/or spills. He explained that drips and/or spills of hazardous wastes are cleaned immediately.

I noted that the piping for the hazardous waste AATs was labeled as spent flux and spent acid

(Attachment 6, Photograph 15). Mr. Zintz explained that the piping is empty unless spent pickle liquor/rinsewater/flux solution is being loaded or unloaded from the tanks.

I asked Mr. Zintz how much waste accumulating in the hazardous waste AATs. Mr. Zintz retrieved the tank inspection form, which indicated AAT No. 1 was empty and AAT No. 2 held 1,200 gallons of spent pickle liquor/rinsewater/flux solution. Mr. Zintz explained that the AATs are emptied approximately once per month. He added that the facility utilizes the AATs on an alternating basis, with one AAT filling while the other is empty. During the records review, I reviewed the hazardous waste AAT inspection forms from December 31, 2018, through February 16, 2023, and noted no missed inspections (including weekends and holidays). I also noted that the tanks were emptied approximately once per month. A copy of the tank inspection form for the week of February 6, 2023, is included as Attachment 8. Based on the February 6, 2023, inspection form, hazardous waste AAT No. 2 was last emptied on February 9, 2023.

Mr. Zintz stated the latest professional inspection of the hazardous waste AATs was performed by the manufacturer in March 2020. The inspection report concluded the tanks were in good condition with no foreseeable expectation of failure. The tanks are due to be re-inspected in 2025.

I asked Mr. Zintz how personnel would summon emergency assistance. Mr. Zintz stated personnel in the area would use a company supplied two-way radio or activate the emergency alarm located outside of the entrance to the Acid Storage Building.

I observed three bags of soda ash, two bags of absorbent, two brooms, and a shovel outside of the secondary containment structure for emergency response to small hazardous waste spills. I also observed safety equipment (rubber gloves and boots, aprons, and face shields) nearby. I did not photograph the emergency response items during the CEI. According to Mr. Zintz, Iowa Steel has a Hazardous Materials (HAZMAT) Response Team to respond to major releases of hazardous waste.

Messrs. Zintz and Jones accompanied me to the Galvanizing area, where I observed the dip tanks (water rinse, hydrochloric acid, water rinse, flux tank, and molten zinc) utilized in the galvanizing process. I noted no deficiencies with the dip tanks or management of spent pickle liquor/rinsewater/flux solution generated during the galvanizing process.

Mill scale waste is generated during the drawing process, collected in containers next to the drawing area, and transferred to a roll-off container on the east side of the facility. Iowa Steel considers the waste to be nonhazardous based on product/process knowledge and testing. The facility generates approximately 270 tons of mill scale waste per year. The waste is transported to Rosenman's Inc. in Ottumwa, Iowa, for recycling.

According to the October 7, 2021, analytical report, the mill scale waste sample (identified as Millscale Clean) was analyzed for total metals and TCLP metals. All TCLP metals results were reported as not detected (ND) (Attachment 7, Page 14). Based upon this analysis, it appears the nonhazardous waste determination for mill scale waste is adequate.

During the CEI, I observed one container holding mill scale waste from drawing operations in the Drawing Room (Attachment 6, Photograph 16). I noted no deficiencies with management of mill scale waste.

Used soap is generated during the wire drawing process. It is collected in 55-gallon containers and transferred to one of two general trash roll-off containers. The facility considers the waste to be nonhazardous based on product/process knowledge and testing. The facility generates approximately 108 tons of used soap waste per year. The waste is transported to SWISWA in Tracy, Iowa for disposal.

According to the October 7, 2021, analytical report, the used soap sample was identified as Millscale and Soap Dumpster. Mr. Zintz stated that when used soap is swept up, it contains a small amount of mill scale waste. The analytical results for all TCLP metals were reported as ND (Attachment 7, Page 15). Based on this analysis, it appears the nonhazardous waste determination for used soap is adequate.

During the CEI, I observed one, 55-gallon container of used soap near the drawing lines (Attachment 6, Photograph 17). I noted no deficiencies with management of used soap.

Zinc skim and zinc dross is generated during skimming the molten zinc tank and twice a year from cleaning the molten zinc tank. The waste is collected in containers near the zinc tank and transferred to a concrete pad. Zinc skim and zinc dross are considered to be nonhazardous wastes based on product/process knowledge and testing. The facility generates approximately 110,700 pounds of zinc skim per month and approximately 19,100 pounds of zinc dross per month. The waste is transported to Rosenman's Inc, in Ottumwa, Iowa, for recycling. Zinc skim and zinc dross were last collected on February 6, 2023, and October 27, 2022, respectively.

According to the October 7, 2021, analytical report, the zinc skimmings and zinc dross sample results were below characteristic hazardous waste limits or ND for all TCLP metals (Attachment 7, Pages 19 and 20). Mr. Zintz also provided a copy of an analytical report for zinc dross, dated September 8, 2022 (Attachment 9). In this report, zinc dross sample results were ND for all TCLP metals (Attachment 9, Page 8). Based on the analytical reports, it appears the nonhazardous waste determinations for zinc skim and zinc dross are adequate. I noted no deficiencies with the management of zinc skim and zinc dross.

Scrap metal is primarily generated during fencing production. It is accumulated in containers and transferred to a trailer near the entrance to the facility. Scrap metal is considered to be excluded from the definition of solid waste when recycled. The facility generates approximately 185 tons of scrap metal per month. Scrap metal is transported Rosenman's Inc. in Ottumwa, Iowa, for recycling. Scrap metal was last collected on February 15, 2023.

I observed the trailer of scrap metal located at the entrance to the facility and noted no deficiencies with the management of scrap metal.

Used oil is generated during maintenance of drawing gear boxes and fork trucks. Used oil is collected and transferred to a 200-gallon used oil storage container outside of the Fork Truck Shop. Used oil is managed according to provisions of 40 CFR Part 279. The facility generates

approximately 300 gallons of used oil per year. Used oil is transported to Heritage – Crystal Clean in Des Moines, Iowa, for recycling. Used oil was last collected on June 9, 2022.

During the CEI, I observed four, 200-gallon used oil storage containers outside of the Fork Truck Shop (Attachment 6, Photograph 2). The used oil storage containers were in good condition with no apparent leaks, labeled with the words "used oil," and held a total of approximately 350 gallons of used oil. I noted no deficiencies with the management of used oil.

Used oil filters are generated during maintenance of drawing gear boxes and fork trucks. Used oil filters are punctured and hot-drained prior to transfer to a 55-gallon used oil filter storage container in the Fork Truck Shop. The facility manages used oil filters as used oil according to provisions of 40 CFR Part 279. Iowa Steel generates approximately 55 gallons of used oil filters per year. Used oil filters are transported to Safety-Kleen Systems in Des Moines, Iowa, for recycling. Used oil filters were last collected on July 22, 2022. I did not observe used oil filters during the CEI.

Waste aerosol cans are generated during facility equipment maintenance. The waste is collected in 55-gallon satellite accumulation containers (SACs) located in maintenance areas. Waste aerosol cans are considered hazardous (D001, D035) and nonhazardous based on product knowledge. According to Mr. Zintz, the facility generates approximately 167 waste aerosol cans per month. Waste aerosol cans are transferred to an aerosol can puncturing station. Aerosol can waste is drained into a 55-gallon SAC and punctured, empty aerosol cans are managed as scrap metal and transferred to a scrap metal container.

During the CEI, I observed three 55-gallon SACs in the Machine Shop, Fabrication Shop, and EVG Building that held waste aerosol cans. Each SAC was near the point of generation, under the control of an operator, closed, labeled with the words "hazardous waste" and an indication of the nature of the hazard, and held less than 55 gallons of waste aerosol cans.

I explained to Messrs. Zintz and Jones that waste aerosol cans could be managed as universal waste according to provisions of 40 CFR Part 273 until the waste aerosol cans are punctured. I provided compliance assistance regarding universal waste aerosol cans to Messrs. Zintz and Jones. I noted no deficiencies with the management of waste aerosol cans.

Aerosol can waste is generated when aerosol cans are punctured into a 55-gallon SAC in a storage building outside of the Drawing department. Punctured aerosol cans are disposed as scrap metal. The facility considers the drained, aerosol can waste to be hazardous (D001, D035) based on product knowledge. The facility generates approximately 55 gallons of aerosol can waste every eight years. Aerosol can waste is transported to Safety-Kleen Systems in Smithfield, Kentucky, for fuel blending. The waste was last collected on October 13, 2022.

During the CEI, I observed a 55-gallon SAC of aerosol can waste with a puncturing device affixed to the lid in the storage shed outside the Drawing department (Attachment 6, Photograph 1). The SAC of aerosol can waste was at the point of generation, under the control of an operator, closed, labeled with the words "hazardous waste" and an indication of the nature of the waste, and held less than 1 gallon of aerosol can waste. I noted no deficiencies with the management of aerosol can waste.

Waste batteries are generated during facility equipment maintenance. They are transferred to a 25-gallon universal waste battery accumulation container in the Machine Shop, and ultimately transferred to a 5-gallon RecyclePak® container for off-site shipment. Waste batteries are managed as universal waste according to provisions of 40 CFR Part 273. The facility generates approximately 5 gallons of universal waste batteries per year. The waste is transported to Veolia ES Technical Solutions in Port Washington, Wisconsin, for recycling. The last shipment of universal waste batteries was on April 11, 2022.

During the CEI, I observed a 25-gallon universal waste battery accumulation container in the Machine Shop (Attachment 6, Photograph 18). The universal waste battery accumulation container held eight universal waste batteries and was labeled with the words "universal waste batteries" and an accumulation start date of April 12, 2022 (Attachment 6, Photograph 19). I noted no deficiencies with management of waste batteries.

Waste Lamps are generated during facility maintenance. They are transferred upon generation to universal waste lamp accumulation containers in Power Room No. 4. The facility manages waste lamps as universal waste according to provisions of 40 CFR Part 273. The facility generates approximately 150 universal waste lamps per year. The waste is transported to Veolia ES Technical Solutions in Port Washington, Wisconsin, for recycling. The last shipment of universal waste lamps was on February 7, 2023.

During the CEI, I observed three universal waste lamp accumulation containers in Power room No. 4 (Attachment 6, Photographs 3 and 5). All three universal waste lamp accumulation containers were structurally sound, closed, and labeled with the words "used lamps." The accumulation start dates were marked on all universal waste accumulation containers, and the earliest date was July 7, 2022. I noted no deficiencies with management of waste lamps.

General trash is generated during production and facility maintenance. It is accumulated in various containers throughout the facility and transferred to one of two, 20-cubic-yard containers. General trash is considered nonhazardous based on product/process knowledge. The facility generates approximately 8,000 pounds of general trash per month. General trash is transported to SCISWA in Tracy, Iowa, for landfill disposal.

I observed one of the two 20-cubic-yard containers located east of the Machine Shop. I noted no deficiencies with management of general trash.

4. Container Accumulation Area

Iowa Steel does not utilize a hazardous waste container accumulation area (CAA). The only hazardous waste generated at the facility, aside from spent pickle liquor/rinsewater/flux (covered in the waste stream section), is aerosol can waste. This waste is collected in a 55-gallon SAC. When the SAC nears 55 gallons, Iowa Steel schedules collection of the container. As such, a CAA is not needed.

5. Manifests, Bills of Lading, Biennial Report

The facility generated 83 manifests from February 20, 2020, through February 9, 2023. I reviewed all 83 manifests during the CEI. A copy of manifest No. 016126738FL, dated January 11, 2023, and associated Waste Tank Truck Receipts are in Attachment 10. I reviewed the land disposal restriction (LDR) notifications associated with spent pickle liquor/rinsewater/flux and aerosol can waste. Prior to the CEI, I reviewed the 2021 Biennial Report, which was submitted to EPA on February 4, 2022. I noted no deficiencies during review of the manifests, LDR notifications, or the Biennial Report.

6. 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. I did not request copies of all documents reviewed.

I asked Mr. Jones about the training provided to Iowa Steel employees. Mr. Jones stated Iowa Steel provides general awareness HAZMAT training to all production employees. He stated Iowa Steel also maintains an emergency response team, and all employees who work with or manage the hazardous waste at the facility are on the emergency response team. Mr. Jones stated that the emergency response team receives annual 8-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) refresher training, which includes training on the RCRA Contingency Plan. I obtained copies of the attendance sign-in sheets from 2020 through 2022 (Attachment 11).

Iowa Steel maintains documentation of job titles and the name of employees filling the position specified, as required by 262.17(a)(7)(iv)(A). Mr. Jones provided a copy of the HAZMAT team listings that included Messrs. David Pettibone (Maintenance Supervisor) and Kenny Brown (performs AST inspections). I noted the listings included their name, job title and duties, HAZMAT team title and duties, as well as previous work experience and hazardous materials training background, as required by 262.17(a)(7)(iv)(B).

Iowa Steel maintains a written description of the type and amount of initial and continuing training provided, as required by 262.17(a)(7)(iv)(C). I reviewed a copy of a training matrix entitled "Training Requirements," which includes the type and amount of initial and continuing training provided for each job description. I noted no deficiencies with training during the CEI.

7. Preparedness and Prevention and Contingency Plan

As a LQG of hazardous waste, Iowa Steel is required to arrange for emergency response with local emergency agencies, to designate an emergency coordinator (EC) for the facility, and maintain a RCRA Contingency Plan. I reviewed the contingency plan, dated Fall 2022, during the CEI.

I noted the RCRA Contingency Plan included a description of actions needed to respond to fires and explosions and spills, as required by 40 CFR 262.17(a)(6) referencing 262.261(a). The plan included a description of arrangements with the local emergency agencies, as required by

40 CFR 262.17(a)(6) referencing 262.261(c). The plan included a list of emergency response equipment (including capabilities and location), as required by 40 CFR 262.17(a)(6) referencing 262.261(e). The plan included a complete evacuation plan with a description of the signals used, as required by 40 CFR 262.17(a)(6) referencing 262.261(f).

The RCRA Contingency Plan included the telephone numbers of the primary EC (Bill Zintz) and alternate EC (Cliff Jones) as required by 40 CFR 262.17(a)(6) referencing 262.261(d). The plan also included a Quick Reference Guide which included all of the requirements, as required by 40 CFR 262.17(a)(6) referencing 262.261(b)(1-8). Mr. Jones stated that the RCRA Contingency Plan has been delivered to all emergency agencies, such as the Centerville fire and police departments, and Mercy One Centerville Medical Center, as required by 40 CFR 262.17(a)(6) referencing 262.261(a). I noted no deficiencies with content of the RCRA Contingency Plan during the CEI.

8. Summary of Preliminary Findings

In summary, as part of the CEI, I made no preliminary findings.

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

William F Starks Digitally signed by William F Starks Date: 2023.04.06 16:21:15 -05'00' Date: _____

William F. Starks
Environmental Consultant
CLAENE Group, LLC.

AMBER WHISNANT Digitally signed by AMBER WHISNANT Date: 2023.04.19 20:43:17 -05'00' 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. Facility Diagram (1 Page)
5. Google Maps Aerial Image of the Facility (1 Page)
6. Photographic Documentation (19 Photos and Photolog) (13 Pages)
7. Eurofins TestAmerica Analytical Report, Dated October 7, 2021 (69 Pages)
8. Tank Inspection Form for the Week of February 6, 2023 (1 page)
9. Eurofins Canton Analytical Report for Zinc Dross, Dated September 8, 2022 (17 Pages)
10. Hazardous Waste Manifest 016126738, Dated January 11, 2023, and Associated Waste Tank Truck Receipts (5 Pages)
11. Training Sign-in Sheets, Dated December 1, 2020; November 16, 2021; and November 15, 2022 (3 Pages)