

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

Quality Plus Manufacturing
1007 Industrial Park Dr.
Oelwein, IA 50662
(888) 529-8768

EPA ID Number: IAR000517052

On

January 27, 2022

By

Eastern Research Group, Inc.

For

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/Chemical Branch/RCRA Section (ECAD/CB/RCRA) of the U.S. Environmental Protection Agency (EPA) Region 7, Eastern Research Group, Inc. (ERG) conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Quality Plus Manufacturing (QPM) in Oelwein, Iowa on January 27, 2022. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. Throughout the CEI, data and information were collected to determine compliance with the applicable regulatory and statutory requirements. The inspection report and attachments present the results of the CEI.

2.0 PARTICIPANTS

Quality Plus Manufacturing:
Isaac Kane, Operations Manager

EPA Representative, ERG:
Janosh Wolters, Energy Engineer

3.0 INSPECTION PRECEDURES

After arriving unannounced at QPM at approximately 09:30, I performed a drive-by visual inspection of the facility and took a photograph before beginning the inspection and did not note any areas of concern. I then entered the main entrance and observed a sign stating to call the office telephone number to be granted entry. I called the phone number, introduced myself, and explained my reason for being on site is to conduct a RCRA CEI and asked to meet with the facility personnel who manage hazardous waste on site. I was granted entry by Ms. Risner who led me to a conference room. Ms. Risner explained that Mr. Kane would be assisting me during the entire inspection, and he was on his way to the conference room. After approximately five minutes, Mr. Kane entered the conference room. I initiated the opening conference with Mr. Kane as the QPM representative. I presented Mr. Kane with my inspector credentials and business card, as well as the business card of the EPA Task Order Contracting Officer Representative, Mr. Trevor Urban. I then presented a copy of RCRA Section 3007(a), which contains EPA's inspection authority. I explained my need to collect accurate information and presented them with a copy of Title 18 U.S. Code, Sections 1001 and 1002. I then presented Mr. Kane with a copy of the *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections* and reviewed Ashley's confidentiality rights. I informed Mr. Kane that I would provide a *Confidentiality Notice* at the end of this inspection.

The inspection consisted of a discussion of facility operations, waste generation and waste management, a review of waste management records, and a visual inspection of the waste generation and management areas. Mr. Kane provided a facility layout (see Attachment 1) and explained facility operations and locations of hazardous waste generation and management.

During the visual inspection of the facility, Mr. Kane guided me throughout the facility in order to conduct a thorough evaluation of the entire facility. At the time of the inspection, the facility only accumulated hazardous waste next to the facility's paint booth and in one central location in an outdoor covered container area (see Attachment 3, Photo 5). This location is labeled as "CAA" on the facility layout but due to the facility's generator status as a VSQG, the facility is not required to manage the area as a regulated CAA per 40 CFR 262.16 or 40 CFR 262.17. The facility also handles universal waste in a designated area on site as shown on the facility layout (see Attachment 1). The universal waste storage area was visually inspected. I conducted an in-depth visual inspection of the hazardous waste storage area, the universal waste storage areas, used oil storage area, and all manufacturing areas.

Seven photographs were collected as inspection documentation and are shown in Attachments 2 and 3. Information collected during the inspection is documented on the *EPA Inspection Checklist* (see Attachment 4). I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.01D), unless noted differently. At the conclusion of the inspection, I provided Mr. Kane with a *Confidentiality Notice, Receipt for Documents and Samples*, and a *Notice of Preliminary Findings* which he signed as acknowledgement of receipt (see Attachments 5, 6, and 7 respectively). No confidentiality claims were made by QPM.

The following inspection documents and compliance assistance handouts were left with QPM:

RCRA Section 3007(a)

Title 18 U.S. Code, Sections 1001 and 1002

*Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by
EPA in Connection with Inspections*

Confidentiality Notice (Facility copy)

Receipt of Documents and Samples (Facility copy)

NOPF (Facility copy)

Instructions for Responding to a NOPF

Security Awareness

Commercial Motor Vehicle Transportation

Security Planning

EPA E-Manifest Fact Sheet U.S.

EPA Small Business Resources

U.S. EPA Publication, Managing Your Hazardous Waste

U.S. EPA Publication, Managing Used Oil-Advice for Small Businesses

PowerPoint Presentation, 2013 Solvent Wipes Final Rule

Pollution Engineering Article, 10 Common Questions for Waste Generators

Iowa Department of Natural Resources (IDNR) Waste Exchange Folder and P2 Brochures

IDNR Management of Fluorescent Lamps for Businesses Information Sheets

IDNR Aerosol Can Disposal for Businesses Information Sheet

University of Northern Iowa Waste Reduction Center Information Card

Solvent-Contaminated Wipes Final Rule Summary Chart

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

QPM began operating in 2012 and currently employs approximately 18 people. The facility typically operates one 10-hour shift, Monday through Thursday. The facility has a footprint of approximately 60,000 square feet. QPM operations consist of the manufacturing of agricultural equipment, specializing in seed treaters. The major raw materials used are steel, paint, and solvent. The major manufacturing or processing operation that generates waste streams include machining steel, welding, sand blasting and painting. The following waste streams are produced: waste paint related material, shop rags, machine coolant, sand blast media, aerosol cans, paint booth filters, scrap metal, used oil, used oil filters, universal wastes, and general trash.

4.2 RCRA Status

According to the *Hazardous Waste Site Info Verification Report for Inspector* (see Attachment 8), QPM notified as a federal Small Quantity Generator (SQG) of D001, F003, and F005 hazardous wastes. I asked Mr. Kane to review the *Hazardous Waste Site Info Verification Report for Inspector*, which I provided prior to records review and visual inspection of the waste

generation areas. Mr. Kane explained the facility is operating as a federal Very Small Quantity Generator (VSQG) and only notified as a SQG because it was anticipated that production would increase approximately two years prior to the inspection. Mr. Kane explained this did not occur and the facility does not generate more than 100 kilograms of hazardous waste per month. Based on a review of facility records, I determined QPM has generated approximately 80 kilograms of hazardous waste monthly over the last 18 months. After reviewing the records and walking through the facility, I determined that the facility is operating as a VSQG of D001, F003, and F005 hazardous wastes, a generator of used oil, and a small quantity handler (SQH) of universal waste.

QPM has not been previously inspected by EPA or an EPA contractor. This inspection was the first time QPM was inspected for RCRA compliance.

4.3 Facility Waste Streams and Management

A Waste Stream and Waste Handling Table for QPM is presented below. The table describes waste streams generated, generation process/rates, hazardous waste determinations, and on-site/off-site management.

The rest of this page left blank intentionally.

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
1	Waste Paint Related Material (Flush Solvent Safety Data Sheet (SDS) included in Attachment 9)	Flushing paint lines	D001, F003, F005 (based on process knowledge and knowledge of the product)	150 pounds per month	55-gallon containers	Barton Solvents Inc. in Des Moines, IA (IAD981719909) to Coal City Cob Company, Inc. in Waxahachie, Texas (TXR000079839) to WRR Environmental Services in Eau Claire, WI (WID990829475) for reclamation
2	Shop Rags	Cleaning off excess solvent from paint guns	Facility determined nonhazardous however I determined to be hazardous for D001, F003, and F005 (based on process knowledge and knowledge of the product)	One 5-gallon container per month	5-gallon container	Black Hawk Waste Disposal in Waterloo, IA to Black Hawk County Solid Waste Landfill in Waterloo, IA for landfill
	NOPF 1 – Failure to make an adequate waste determination. [40 CFR 262.14(a)(2)→262.11(a)]. At the time of the inspection, the facility was not managing these rags under an exclusion nor as a hazardous waste. See section 4.4 of this report for more information.					

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
3	Machine Coolant (SDS included in Attachment 10)	Coolant used on machines	Nonhazardous (based on process knowledge and knowledge of the product)	30-gallons every five years	55-gallon container	Barton Solvents Inc. in Des Moines, IA (IAD981719909) to Coal City Cob Company, Inc. in Waxahachie, Texas (TXR000079839) to WRR Environmental Services in Eau Claire, WI (WID990829475) for treatment
	Provided compliance assistance for potentially managing this waste stream as used oil. See Sand Blast Operations/Machine Coolant section of this report for more details.					
4	Sand Blast Media (Analytical Testing Report included in Attachment 11)	Sand blasting with silica-based media	Nonhazardous (based on process knowledge, knowledge of the product, and analytical testing)	One 55-gallon container per week	55-gallon container	Black Hawk Waste Disposal in Waterloo, IA to Black Hawk County Solid Waste Landfill in Waterloo, IA for landfill
5	Aerosol Cans (SDS included in Attachment 12)	Paint touchups	Nonhazardous (based on process knowledge and knowledge of the	10 cans per year	Determined RCRA empty and added to general trash	Black Hawk Waste Disposal in Waterloo, IA to Black Hawk

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
			product)			County Solid Waste Landfill in Waterloo, IA for landfill
6	Paint Booth Filters (Analytical Report included in Attachment 11 and SWA included in Attachment 13)	Painting operations	Nonhazardous (based on process knowledge, product, and analytical testing)	Paint booth filters are changed out four times per year	20-yard container	Black Hawk Waste Disposal in Waterloo, IA to Black Hawk County Solid Waste Landfill in Waterloo, IA for landfill
7	Scrap Metal	Manufacturing equipment and facility maintenance	Nonhazardous (based on process knowledge and knowledge of the product)	One 5-yard container picked up once per year	5-yard container	Tournier Recycling Inc. in Independence, IA for recycling
8	Universal Waste Lamps (Label Instructions included in Attachment 14)	Facility maintenance	Exempted (managed as universal waste per 40 CFR 273)	Five 4-foot containers per year	4-foot containers	EZ on the Earth in Greenwood, IN for recycling
9	Universal Waste Batteries	Facility maintenance and forklift maintenance	Exempted (managed as universal waste per 40 CFR 273)	Generation varies and primarily by servicing forklifts	Taken off site at the time of servicing	MH Equipment in Ottawa, IL (ILR000117648) for recycling
10	Used Oil (Invoice included in Attachment 15)	Air compressors and forklift maintenance	Exempted (managed as used oil per 40 CFR 279)	Less than 30- gallons per year	Taken off site at the time of servicing	MH Equipment in Ottawa, IL (ILR000117648) for recycling

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
11	Used Oil Filters	Air compressors and forklift maintenance	Exempted (managed as used oil per 40 CFR 279)	Air compressors and forklift maintenance	5-gallon container	MH Equipment in Ottawa, IL (ILR000117648) for recycling
12	General Trash	Facility operations	Nonhazardous (based on process knowledge and knowledge of the product)	20-yard container hauled off site once per month	20-yard container	Black Hawk Waste Disposal in Waterloo, IA to Black Hawk County Solid Waste Landfill in Waterloo, IA for landfill

4.4 Visual Inspection

Painting Operations:

At the time of the inspection, the facility operated one paint booth on site (see Attachment 3, Photo 3). Mr. Kane explained the painting operations are all conducted via manual spray paint guns. Mr. Kane explained the primary manufactured product that is painted is the seed treater. Mr. Kane stated this was the only operation on site that generated hazardous waste. I asked Mr. Kane how paint guns are cleaned between painting operations. Mr. Kane stated paint guns are cleaned as needed flushing a solvent solution through paint gun lines. During records review, I reviewed the SDS for the solvent solution which is also provided in Attachment 9. The facility manages this waste as a D001, F003 and F005 hazardous waste. Paint waste is accumulated in a 55-gallon container next to the paint booth (see Attachment 3, Photo 2). Once 55-gallon containers are filled, they are moved to a central storage location as labeled on the facility layout (see Attachment 3, Photo 5). Mr. Kane stated all shipments of hazardous waste are shipped off site on a hazardous waste manifest. An example of a manifest is provided in Attachment 16. All waste paint related material waste containers were closed, in good condition, labeled “Hazardous Waste”, and labeled with an indication of the nature of the hazard.

During the visual inspection, I observed a 5-gallon flammable storage container (see Attachment 3, Photo 4). I visually inspected the contents and asked Mr. Kane how the rags I observed in the container were generated. Mr. Kane explained the outside of the paint guns are cleaned by spraying solvent on the gun and wiping off excess solvent with a rag. Mr. Kane stated the rags are placed in the container when they are still wet. I asked Mr. Kane how the rags were disposed of. Mr. Kane stated once the rags are completely dry, they are placed in a general trash container and sent off site as general trash. During records review, I reviewed the paint gun cleaner SDS provided in Attachment 12. The SDS indicated the composition of the waste is 80%-100% acetone. I explained to Mr. Kane because the rags contain free liquids when they are placed inside the 5-gallon flammable containers, the rags must either be managed as a hazardous waste or under the solvent contaminated wipes exclusion set forth in 40 CFR 261.4(a)(26). At the time of the inspection, the facility was not managing these rags as hazardous waste or under the exclusions stated above. Therefore, the following finding was left with the facility:

NOPF 1 – Failure to make an adequate waste determination. [40 CFR 262.14(a)(2)→262.11(a)].

Mr. Kane stated paint booth filters are also added to general trash containers but are managed under a SWA. During records review, I reviewed the SWA and observed it has an expiration date of December 31, 2021. In addition, I observed the analytical data for paint booth filters as shown in Attachment 11. I asked Mr. Kane if he had an updated SWA. Mr. Kane stated he is in negotiations with the Black Hawk County Solid Waste Management to renew the SWA. Mr. Kane stated they have just received the sample containers and will be collecting the sample in the near future. Mr. Kane stated the coolers in the front lobby were from a lab that would be analyzing the samples (see Attachment 3, Photo 7).

Sand Blast Operations/Machine Coolant:

QPM conducts sand blasting on site as part of the manufacturing process for the treater. Sand blast media waste dust is vented directly into a 55-gallon container and sent off site with a SWA. The SWA is provided in Attachment 11. Before equipment is sandblasted, Mr. Kane explained that pieces of manufactured equipment could be cut. These cutting machines use coolant which is changed out approximately once every five years. The machine coolant is a nonhazardous waste and the SDS is provided in Attachment 12. Based on the composition section of the SDS stating “soluble oil”, I explained to Mr. Kane the definition of used oil and provided compliance assistance that this waste stream may need to be managed as used oil in the future. I did not note any issues or findings regarding the facility’s sand blast media operations.

Aerosol Cans:

During the visual inspection, I only observed aerosol cans inside the paint booth. The aerosol cans contain the solvent gun cleaner and Mr. Kane stated approximately 10 cans are generated per year. Mr. Kane stated the facility uses aerosol cans until RCRA empty and disposes of them in the general trash. Mr. Kane explained if an aerosol can were to break, or become unusable, it would be considered hazardous waste, added to a 5-gallon container, and managed as a hazardous waste. I did not note any issue or findings regarding the facility’s use of aerosol cans.

Used Oil:

QPM operates air compressors and forklifts on site. This equipment requires oil, and this generates used oil. Mr. Kane stated the facility generates less than 30 gallons of used oil every year. The facility uses a third-party company, M H Equipment, to service all air compressors and forklifts. An invoice with a used oil shipment is provided in Attachment 15. M H Equipment hauls all used oil and used oil filters off site at the time of servicing. The one 5-gallon container I observed was closed, labeled “Used Oil”, and in good condition. Upon further EPA review, it may be determined that the facility’s machine coolant waste stream would need to be managed as a used oil. I did not note any issues or findings at the used oil storage area.

Universal Waste:

QPM manages a minimal amount of universal waste lamps and batteries on site. I observed a total of one 4-foot cardboard container of universal waste lamps. The containers were located near tool battery storage as shown on the facility layout (see Attachment 1). At the time of the inspection, I did not observe any universal waste batteries on site. Mr. Kane stated it is extremely rare for the facility to generate used batteries due to the facility using almost all pneumatic power tools. In addition, Mr. Kane stated when forklift batteries are generated on site, M H Equipment hauls these off site. Mr. Kane stated if universal batteries would be generated, he would bring them to a recycling center. I asked Mr. Kane when was the last time the facility generated

universal waste batteries. Mr. Kane stated he could not remember the last time the facility generated used batteries besides forklift batteries. During records review, Mr. Kane provided me with the universal waste lamps label which is provided in Attachment 14 as an example. Mr. Kane stated the boxes and labels are purchased from EZ On The Earth and are shipped off site using the included shipping label. Lastly, Mr. Kane stated the facility has recently begun the transition to all LED lighting. The container was labeled “Universal Waste Lamps” and was dated with an accumulation start date of “1/26/2022” (see Attachment 3, Photo 6). I did not note any issues or findings at the universal waste accumulation area.

5.0 SUMMARY OF FINDINGS

NOPF 1 – Failure to make an adequate waste determination. [40 CFR 262.14(a)(2)→262.11(a)].

Mr. Kane stated acetone-soaked rags are added to a 5-gallon flammable container and once no free liquids are present, is disposed as general trash. At the POG, the waste would be considered a D001 and F003 hazardous waste.

I observed no additional issues or findings during this inspection. However, further EPA review may add findings.

**Janosh
Wolters**
Janosh Wolters
Energy Engineer
Date: March 15, 2022

Digitally signed by Janosh
Wolters
Date: 2022.03.15 13:43:03
-04'00'

**AMBER
WHISNANT**
Amber Whisnant
Section Chief
ECAD/CB/RCRA, EPA Region 7
Date: _____

Digitally signed by AMBER
WHISNANT
Date: 2022.03.22 13:47:30
-05'00'

Attachments:

1. Facility Layout (1 page)
2. Quality Plus Manufacturing Photolog (1 page)
3. Quality Plus Manufacturing Photos (7 Photos/8 pages)
4. EPA Inspection Checklist (16 pages)
5. Confidentiality Notice (1 page)

6. Receipt for Documents and Samples (1 page)
7. Notice of Preliminary Findings (1 page)
8. Hazardous Waste Site Info Verification Report for Inspector (1 page)
9. Solvent SDS (17 pages)
10. Machine Coolant SDS (7 page)
11. Blast Media Analytical Report (16 pages)
12. SDS Paint Gun Cleaner Aerosol Can (7 pages)
13. SWA Paint Booth Filters (1 page)
14. Universal Waste Lamps Container Instructions (1 page)
15. Used Oil Invoice (1 page)
16. Manifest (2 pages)

Notice of Preliminary Findings

(For Contractor Use Only)

Facility Name: Quality Plus Manufacturing
Facility Address: 1007 Industrial Park Dr.
Delaware, IA 50662
EPA ID#: JAR000517052 Date: 01/27/2022

Notice: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for the EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to the EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and will make determinations as to what violations may have occurred at your facility.

Citation

Description of Finding

1. 40 CFR 262.14(a)(2) → 262.11(a)

1. Failure to make an adequate waste determination.

If you have any questions about this Notice or wish to discuss your response, you may call me at
484-670-8675, or Trevor Urban (Compliance Officer)
at 913-551-7133.

This Notice prepared by Janosh Walters Date: 01/27/2022

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

Printed Name: Isaac Kane Date: 1/27/22

Signature: Isaac Kane

Title: Operations Manager

Page 1 of 1