

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

CLOW VALVE COMPANY – MACHINE SHOP

902 South 2nd Street
Oskaloosa, Iowa 52577
641-569-6093

EPA ID Number: IAD980684971

On

November 18, 2024

By

TOEROEK ASSOCIATES, INC.

For

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region 7

Enforcement and Compliance Assurance Division

INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division/Chemical Branch/RCRA Section (ECAD/CB/RCRA) of the U.S. Environmental Protection Agency (EPA) Region 7, Toeroek Associates, Inc., and its subcontractor CLAENE Group (Toeroek team) conducted a hazardous waste compliance evaluation inspection (CEI) at Clow Valve Company – Machine Shop (CVCMS) at 902 South 2nd Street in Oskaloosa, Iowa. The CEI was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. The CEI covered hazardous waste generator requirements, used oil management, and universal waste requirements, as applicable. This report and its attachments present the results of the CEI.

PARTICIPANTS

CVCMS:

Dain Netland, Environmental Manager
Cindy Thompson, Assistant Environmental Manager
Andy Thompson, Environmental Specialist
Ryan Van Dolen, Plant Manager (Entry and Exit Briefing only)
Chris Prendergast, Assistant General Manager (Entry and Exit Briefing only)
Mark Willett, Vice President/General Manager (Exit Briefing only)
Brian Bigley, Health & Safety Manager

Toeroek Team:

Clifford Nelles, Inspector, 816-213-5192

INSPECTION PROCEDURES

Prior to the CEI at CVCMS on November 18, 2024, I conducted a drive-by visual inspection. I did not observe any areas of concern during the drive-by. At approximately 7:55 a.m., I entered the main office and was met by Mr. Bigley. I explained the purpose of CEI and asked to speak with Mr. Dain Netland, who was listed as the site contact on the Notification Acknowledgment/Verification Report (Verification Report) provided by EPA prior to the inspection (Attachment 1). Mr. Bigley stated that Mr. Netland was not in his office, but that he would contact him and several other people to inform them of my arrival. Mr. Bigley escorted me to a conference room where I was met by Messrs. Van Dolen and Prendergast after approximately 10 minutes. Messrs. Thompson, Netland, and Ms. Thompson joined us approximately 10 minutes later. I explained the purpose and scope of the CEI to Messrs. Netland, Van Dolen, Prendergast, Thompson, and Ms. Thompson (CVCMS team). I then proceeded to conduct an entry briefing with the CVCMS team.

During the entry briefing, I presented my business card and EPA credentials to the CVCMS team. I explained the scope and procedures for the CEI. I explained the facility's right to make confidentiality claims for any or all the information obtained and provided a Notice Regarding Proprietary/Confidential Business Information. I stated that at the conclusion of the CEI, Mr. Prendergast 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 the CVCMS team a copy of U.S. Federal Codes 1001 and 1002, concerning communication of false statements and documents to federal inspectors, and RCRA Section 3007, explaining EPA's inspection authority, both of which they read.

Copies of the following documents were left with Mr. Netland during the inspection:

- RCRA Facility Access Information Sheet
- RCRA Section 3007
- U.S. Federal Codes 1001 and 1002
- Instructions for Responding to a Notice of Preliminary Findings
- Notice Regarding Proprietary/Confidential Business Information

The following documents were sent electronically to Mr. Netland.

- E-Manifest Fact Sheet: Generators
- Managing your Hazardous Waste: A Guide for Small Businesses
- U.S. EPA Small Business Resources Information Sheet
- Solvent-Contaminated Wipes Final Rule Summary Chart
- IDNR Excluded Solvent-Contaminated Wipes Rule: Management Practices for Wipes, Rags, and Shop Towels
- Recycling Electronics: A Guide for Businesses
- Lead-Based Paint Activities: Handling and Disposal
- Battery Recycling/Disposal
- Management of Fluorescent Lamps for Businesses
- Incompatible Chemicals
- Universal Wastes – Including Aerosol Cans

- TCLP – Toxicity Characteristic Leaching Procedure
- Part 279 Requirements: Used Oil Management Standards
- EPA Region 7 Emergency Response Program
- Chemical Facility Anti-Terrorism Standards
- Iowa Environmental Guide for Businesses

I reviewed the Verification Report (Attachment 1) with the CVCMS team during the CEI. Based on this review and my observations during the CEI, I changed the facility's hazardous waste generator status from large quantity generator (LQG) to small quantity generator (SQG) on the Verification Report. I made no other changes to the Verification Report.

I conducted a visual inspection of the facility, accompanied by Messrs. Netland, Thompson, and Ms. Thompson. After the visual inspection, I reviewed facility records including hazardous waste manifests with land disposal restriction (LDR) notifications, safety data sheets (SDS) for chemicals used at the facility, inspection records, and training documentation. I prepared and completed a site-specific inspection checklist to document my observations.

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

A site map obtained during the CEI is included as Attachment 5 and a Google Earth aerial photograph of the facility is included as Attachment 6. The 23 photographs taken during the CEI are in Attachment 7, all of which are described in this report.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

CVCMS began operating in 1886 and employs 270 people who primarily work one of three shifts (5:00 a.m. to 3:00 p.m. or 3:00 p.m. to 5:00 a.m. Monday through Thursday, or 5:00 a.m. to 5:00 p.m. Friday through Sunday). The facility is in an industrial area on the southeast side of Oskaloosa, Iowa. The facility has a footprint of approximately 350,000 square feet under roof.

CVCMS is a manufacturer of water valve fire hydrants. Major raw materials used at the facility are brass, steel, and paint. According to Mr. Netland, the manufacturing process involves cleaning and painting the exterior of fire hydrants, followed by assembly of valves inside of the hydrants. Paints are primarily applied to hydrants and valves via paint guns in paint booths. The facility also performs powder paint coating on larger valves.

Wastes generated during the painting process include paint booth filters, waste paint related material (WPRM), and powder coat paint. Paint booth filters consist of used paint booth filters

that are wet and flammable, and WPRM consists of waste paint and solvent. The facility considers paint booth filters and WPRM to be hazardous wastes based on product and process knowledge. The facility considers powder coat paint to be nonhazardous waste based on product and process knowledge.

Other manufacturing wastes include spent coolant and coolant sludge from the cooling system recycling equipment, and parts washer fluid generated during cleanout of the parts washer used for small parts cleaning. The facility considers these wastes to be hazardous wastes based on analytical testing.

Aerosol paint cans are used for small painting applications. The facility manages waste aerosol cans as universal waste according to provisions of Title 40 Code of Federal Regulations (40 CFR) Part 273 during accumulation. Accumulated aerosol cans are transferred to the Environmental room where they are punctured and drained. Aerosol can residue drained from the cans is considered to be hazardous waste based on product and process knowledge. Punctured and drained aerosol cans are consolidated with scrap metal for recycling.

Equipment and facility maintenance generate used oil, used oil filters, waste lamps, spent batteries, and general trash. The facility manages used oil and used oil filters according to provisions of 40 CFR Part 279. Waste lamps and spent batteries are managed as universal waste according to provisions of 40 CFR Part 273. General trash consists of office and packaging wastes and is considered by the facility to be nonhazardous waste based on product and process knowledge.

CVCMS was last inspected by an EPA contractor on June 29, 2021, with one preliminary finding for failure to provide annual hazardous waste refresher training to personnel. The preliminary finding was not repeated during this inspection.

2. RCRA Status

The Verification Report (Attachment 1) indicates that CVCMS is registered with EPA, under EPA ID IAD980684971, as a LQG of hazardous waste (generating more than 1,000 kilograms [kg] or 2,200 pounds of hazardous waste per calendar month). During the CEI, I reviewed the facility's 2023 Hazardous Waste Biennial Report and uniform hazardous waste manifests for recent waste shipments to determine the current hazardous waste generator status.

CVCMS manages hazardous waste according to LQG requirements, including submittal of Hazardous Waste Biennial Reports. CVCMS reported a total of 11,330 pounds of hazardous waste in their 2023 Hazardous Waste Biennial Report (Attachment 8). Based on manifest records, the facility ships hazardous waste approximately every three months. Mr. Netland stated that the generation rates are fairly constant. The table below presents a summary of hazardous wastes shipped in 2024.

DATE	WASTE	CODES	WEIGHT	TOTAL
3/11/2024	Sludge	D008	702 pounds (319 kg)	
3/11/2024	WPRM	D001, F003, F005	529 pounds (240 kg)	
3/11/2024	Filters	D001	193 pounds (88 kg)	1,424 pounds (647 kg)
6/13/2024	Coolant	D008	2,500 pounds (1,136 kg)	
6/13/2024	WPRM	D001, F003, F005	250 pounds (114 kg)	2,750 pounds (1,250 kg.)
9/4/2024	Sludge	D008	1381 pounds (628 kg)	
9/4/2024	Filters	D001	317 pounds (144 kg)	
9/4/2024	Coolant	D008	3151 pounds (1,432 kg)	4,849 pounds (2,204 kg.)

At the time of the inspection, the facility had approximately 3,900 pounds of hazardous waste in accumulation that had been generated over approximately 2.5 months. Based on the 2023 Hazardous Waste Biennial Report, manifest records, and my observations during the CEI, I determined that CVCMS is currently operating as a SQG (generating between 100 and 1,000 kg [220 and 2,200 pounds] of hazardous waste per calendar month) and inspected the facility as such. I also inspected CVCMS as a small quantity handler (SQH) of universal waste (accumulating less than 5,000 kg of universal waste at any time) and a used oil generator.

3. Waste Streams

This section of the CEI report describes the waste streams generated by the facility, including the facility's waste determination, generation and management processes, and ultimate disposition. The following discussion of waste streams is based on conversations with facility representatives and the visual inspection.

Coolant sludge is generated during the cleanout of solids from the coolant recycling machine. The facility considers coolant sludge to be hazardous waste (D008) based on analytical testing. A copy of the waste profile for coolant sludge is included as Attachment 9. When the coolant recycling machine is cleaned out, the coolant sludge is accumulated in 55-gallon hazardous waste accumulation containers (HWAC) and transferred to the hazardous waste central accumulation area (HWCAA) in the Environmental room. Based on the 2023 Hazardous Waste Biennial Report, the facility generates approximately 773 pounds (351 kg) of coolant sludge per month (Attachment 8, page 4). Coolant sludge is transported to Tradebe Treatment and Recycling in East Chicago, Indiana, for bulking and off-site transfer.

During the CEI I observed two 55-gallon HWACs of coolant sludge in the HWCAA (Attachment 7, Photographs 21 and 22). The HWACs were structurally sound, full, closed, labeled with the words "hazardous waste" and dated September 3 and October 2, 2024. The HWAC dated October 2, 2024, was not turned so the date was visible for inspection, as required by 40 CFR 262.16(b)(6)(i)(A) (**NOPF No. 4**).

I observed a total of 10 HWACs in the HWCAA (Attachment 7, Photograph 23). Two of the HWACs held coolant sludge. All HWACs in the HWCAA were structurally sound, closed, labeled with the words "hazardous waste," and dated. The HWACs were labeled with hazardous waste codes, but none were labeled with an indication of the nature of the hazard, as required by 40 CFR 262.16(b)(6)(i)(B) (**NOPF No. 2**). I asked Mr. Netland why the containers were labeled with waste codes and not an indication of the nature of the hazard. He stated that during the last

inspection on June 29, 2021, the inspector informed the facility that hazardous waste codes were needed on the containers for indication of the nature of the hazard. I explained that hazardous waste codes alone do not adequately indicate the nature of the hazard (such as toxic or ignitable) of the waste. I provided compliance assistance regarding labeling of HWACs during the CEI.

Paint booth filters are generated during the replacement of spent paint booth filters by maintenance personnel. Spent solvent is not sprayed onto the filters during paint line flushing or cleaning; however, the paint booth filters are wet potentially wet and ignitable when changed out. The facility considers paint booth filters to be hazardous waste (D001) based on product and process knowledge. The waste is accumulated in satellite accumulation area (SAAs) at each paint booth. 55-gallon satellite accumulation containers (SACs) are transferred to the HWCAA when full. Based on the 2023 Hazardous Waste Biennial Report, the facility generates approximately 63 pounds (29 kg) of paint booth filters per month (Attachment 8, page 5). Paint booth filters are transported to Tradebe Treatment and Recycling in East Chicago, Indiana, for bulking and off-site transfer.

During the CEI, I observed a 55-gallon SAC of paint booth filters at the hydrant paint booth (Attachment 7, Photographs 1 through 3). The SAC was structurally sound, closed, labeled with the words “hazardous waste,” near the point of generation, under control of the operator, and held approximately 15 gallons of paint booth filters. However, the SAC was labeled with the hazardous waste code (D001), and not an indication of the nature of the hazard, as required by 40 CFR 262.15(a)(5)(ii) (**NOPF No. 1**). I also observed two HWACs of paint booth filters in the HWCAA (Attachment 7, Photograph 23). The HWACs of paint booth filters were also labeled with the hazardous waste codes and not an indication of the nature of the hazard, as required by 40 CFR 262.16(b)(6)(i)(B) (**NOPF No. 2**). I provided compliance assistance regarding labeling of SACs and HWACs during the CEI.

WPRM consists of waste paint and solvent generated during cleaning of paint guns and lines. The facility considers WPRM to be hazardous waste (D001, F003, F005) based on product and process knowledge. Copies of the SDS for the primary paint (Tneme-Glaze Tmenec White) and solvent (No. 4 Thinner) are included as Attachments 10 and 11. Based on the 2023 Hazardous Waste Biennial Report, CVCMS generates approximately 67 pounds (30 kg) of WPRM per month (Attachment 8, page 4). WPRM is accumulated in SACs near the points of generation, and full SACs are transferred to the HWCAA. WPRM is transported to Tradebe Treatment and Recycling in East Chicago, Indiana, for solvent recovery.

During the CEI, I observed SACs of WPRM at the following locations:

- One 55-gallon SAC at the hydrant paint booth that held approximately 10 gallons of WPRM (Attachment 7, Photographs 4 and 5)
- One 55-gallon SAC at the hydrant floor paint booth that held approximately 25 gallons of WPRM (Attachment 7, Photographs 6 and 7)
- One 55-gallon SAC at the large valve paint booth that held approximately 25 gallons of WPRM (Attachment 7, Photographs 17 and 18)

All three SACs were structurally sound, closed, near the points of generation, under control of the operator, and labeled with the words “hazardous waste.” However, the SACs were labeled

with the hazardous waste codes and not an indication of the nature of the hazard, as required by 40 CFR 262.15(a)(5)(ii) (**NOPF No. 1**). I also observed one HWAC of WPRM in the HWCAA (Attachment 7, Photograph 23). The HWAC of WPRM was also labeled with the hazardous waste codes and not an indication of the nature of the hazard, as required by 40 CFR 262.16(b)(6)(i)(B) (**NOPF No. 2**). I provided compliance assistance regarding labeling of SACs and HWACs during the CEI.

Powder coat paint is generated during powder coat painting of larger valves in a powder coating paint booth. The facility considers powder coat paint to be nonhazardous waste based on product and process knowledge. A copy of the SDS for Amercoat 68HS Powder is included as Attachment 12. I did not determine the generation rate for powder coat paint during the CEI. Powder coat paint is swept up and deposited in 55-gallon containers during paint booth cleaning. The waste is collected by Midwest Sanitation in Oskaloosa, Iowa, for disposal at the Mahaska County Landfill. I did not observe powder coat paint in accumulation at the time the CEI.

Parts washer fluid is generated during the servicing of the parts washer used for cleaning small manufactured parts and machine pieces (Attachment 7, Photograph 13). A copy of the SDS for Surge Industrial Hard Surface Cleaner is included as Attachment 13, and a copy of the waste profile for parts washer fluid is included as Attachment 14. The facility considers parts washer fluid to be hazardous waste (D008) based on analytical testing as well as the potential for the waste to pick up lead concentrations in excess of the toxic characteristic leaching procedure (TCLP) limit. Based on the 2023 Hazardous Waste Biennial Report, CVCMS generates approximately 41 pounds (19 kg) of parts washer fluid per month (Attachment 8, page 5). Parts washer fluid is containerized at the time of parts washer servicing and is transported to Tradebe Treatment and Recycling in East Chicago, Indiana, for bulking and off-site transfer. I did not observe parts washer fluid in accumulation at the time of the CEI.

Spent coolant is generated by changing out the fluid in the coolant recycling machine and tanks. The facility considers spent coolant to be hazardous waste based on analytical testing. A copy of the waste profile for spent coolant is included as Attachment 15. The facility generates approximately 628 pounds (285 kg) of spent coolant per month. The waste is accumulated in 55-gallon HWACs upon generation and transferred to the HWCAA. Spent coolant is transported to Tradebe Treatment and Recycling in East Chicago, Indiana, for bulking and off-site transfer.

During the CEI, I observed five HWACs of spent coolant in the HWCAA (Attachment 7, Photograph 23). The HWACs of spent coolant were structurally sound, closed, labeled with the words “hazardous waste,” and dated. The earliest accumulation start date was September 29, 2024. However, the HWACs were labeled with the hazardous waste code and not an indication of the nature of the hazard, as required by 40 CFR 262.16(b)(6)(i)(B) (**NOPF No. 2**). I provided compliance assistance regarding labeling of HWACs during the CEI.

Aerosol cans consist of used aerosol paint cans used for small painting applications. The facility manages aerosol cans as universal waste according to provisions of 40 CFR Part 273. I did not determine the generation rate for aerosol cans during the CEI. Spent aerosol cans are accumulated in universal waste accumulation containers throughout the facility, near points of generation. When a universal waste accumulation container is full or the accumulation start date

approaches the one-year accumulation limit, the container is transferred to the Environmental room where the aerosol cans are punctured and drained. Aerosol can residue drained from the cans is accumulated in a 55-gallon SAC. Punctured and drained aerosol cans are consolidated with the facility's scrap metal for recycling.

During the CEI, I observed 55-gallon universal waste accumulation containers for aerosol cans in the following locations:

- Hydrant floor assembly (Attachment 7, Photograph 8)
- Brass floor
- Small valve paint booth
- Small valve assembly
- Shipping
- Repair
- Large valve paint booth
- Large valve assembly
- Repair small valve
- Maintenance

Each of these universal waste accumulation containers was structurally sound, closed, labeled with the words "universal waste aerosol cans," and dated April 24, 2024.

I observed another universal waste accumulation container of aerosol cans at the powder paint booth (Attachment 7, Photograph 9). The container was structurally sound, closed, labeled with the words "universal waste aerosol cans," and held approximately 25 gallons of aerosol cans. However, the container was dated May 1, 2023. Based on the accumulation start date, I determined the facility accumulated universal waste for longer than one year, prohibited by 40 CFR 273.15(a) (**NOFF No. 3**). I provided compliance assistance regarding universal waste labeling and accumulation time during the CEI.

Aerosol can residue is generated from the puncturing and draining of aerosol cans in the Environmental room. CVCMS generates approximately 10 pounds (2 kg) of aerosol can residue per month. The facility considers aerosol can residue to be hazardous waste (D001) based on product and process knowledge. The waste is accumulated in a 55-gallon SAC beneath an aerosol can puncturing device. Aerosol can residue is transported to Tradebe Treatment and Recycling in East Chicago, Indiana, for bulking and off-site transfer.

During the CEI, I observed the 55-gallon SAC of aerosol can residue in the Environmental room (Attachment 7, Photographs 19 and 20). The SAC was structurally sound, closed, at the point of generation, under control of the operator, and labeled with the words "hazardous waste." However, the SAC was labeled with the hazardous waste code and not an indication of the nature of the hazard, as required by 40 CFR 262.15(a)(5)(ii) (**NOFF No. 1**). I provided compliance assistance regarding labeling of SACs during the CEI.

Used oil is generated during maintenance of equipment, including fork truck maintenance provided by an outside contractor (MH Equipment in Ottumwa, Iowa). A copy of a work invoice from MH Equipment, dated September 26, 2024, is in Attachment 16. CVCMS generates

approximately 25 gallons of used oil per month. The facility manages used oil according to provisions of 40 CFR Part 279. Used oil is accumulated in 55-gallon containers and is collected by Crystal Clean in Des Moines, Iowa, for recycling.

During the CEI, I observed a 55-gallon used oil storage container beneath a used oil filter draining container in the maintenance shop (Attachment 7, Photograph 11). The used oil storage container appeared to be in good shape without any apparent leaks or damage, held approximately 25 gallons of used oil, and was labeled with the words “used oil.” I observed no deficiencies regarding management of used oil during the CEI.

Used oil filters are generated during maintenance of equipment. The facility generates approximately 55 gallons of used oil filters per year. Used oil filters are punctured and hot-drained into a used oil storage container prior to accumulation in a separate 55-gallon container. The facility manages used oil filters before and after hot-draining as used oil according to provisions of 40 CFR Part 279. Punctured and hot-drained used oil filters are collected by Crystal Clean in Des Moines, Iowa, for recycling.

During the CEI, I observed a used oil filter draining container atop a 55-gallon used oil storage container in the maintenance shop (Attachment 7, Photograph 12). I also observed a 55-gallon container for accumulation of punctured and hot-drained used oil filters in the maintenance shop (Attachment 7, Photograph 12). Both used oil filter containers appeared to be in good shape and were labeled with the words “used oil.” I observed no deficiencies regarding management of used oil filters during the CEI.

Waste lamps are generated by maintenance personnel replacing spent lamps. The facility generates approximately 250 waste lamps per year. CVCMS manages all waste lamps as universal waste according to provisions of 40 CFR Part 273. Waste lamps are accumulated in fiberboard containers in the maintenance shop and are collected by A-TEC Recycling in Des Moines, Iowa, for recycling.

During the CEI, I observed three waste lamps accumulation containers in the maintenance shop (Attachment 7, Photographs 14 and 15). The containers were structurally sound, closed, labeled with the words “universal waste lamps,” dated September 5, 2024, and held approximately 5 to 15 waste lamps each. I observed no deficiencies regarding management of waste lamps during the CEI.

Spent batteries are generated by maintenance personnel replacing batteries in radios and equipment. The facility generates approximately 110 gallons of spent batteries per year. CVCMS manages all spent batteries as universal waste according to provisions of 40 CFR Part 273. Spent batteries are accumulated in 55-gallon containers in the maintenance shop and are collected by A-TEC Recycling in Des Moines, Iowa, for recycling.

During the CEI, I observed a 55-gallon container of spent batteries in the maintenance shop (Attachment 7, Photograph 16). The container was structurally sound, labeled with the words “used batteries,” dated September 5, 2024, and held approximately 10 gallons of spent batteries. I observed no deficiencies regarding management of spent batteries during the CEI.

General trash is generated during facility maintenance and includes, but is not limited to, floor sweepings, paper, and cardboard packaging. The facility has determined that general trash is nonhazardous waste based on product and process knowledge. General trash is accumulated in several containers throughout the facility and is collected by Midwest Sanitation in Oskaloosa, Iowa, for disposal at the Mahaska County Landfill. During the CEI, I observed accumulation of general trash and noted no deficiencies.

4. Required Response Equipment and Hazard Management

Per 40 CFR 262.15(a)(8) and 262.16(b), a SQG must operate to minimize the possibility of a fire, explosion, or spill, and must maintain emergency response equipment. During the visual inspection, I observed spill response equipment consisting of mats, absorbent materials, shovels, and brooms, as well as the presence and availability of fire extinguishers. I determined that the spill and fire response equipment was adequate for the hazardous wastes generated and accumulated at the facility.

5. Container Accumulation Area

CVCMS maintains one HWCAA in the Environmental room. During the CEI, I observed 10 HWACs in the HWCAA (Attachment 7, Photograph 23). I asked Ms. Thompson if the facility inspected the HWCAA. She stated that the HWCAA is inspected weekly and that an inspection log is maintained. I reviewed the inspection log for the last three years and noted that no weekly inspections were missed. A copy of the inspection log for the last inspection, conducted on November 13, 2024, is included as Attachment 17. The inspector noted in the log that all SACs and HWACs were properly labeled and the labels were visible. Based on preliminary findings No. 1, 2 and 4, it appears that the facility failed to perform adequate weekly inspections, as required by 40 CFR 262.16(b)(2)(iv) (**NOPF No. 5**). I provided compliance assistance regarding management of SACs and HWACs during the CEI.

I asked Mr. Thompson how someone would summon emergency assistance. He stated that all personnel who manage hazardous waste carry two-way radios and that a telephone is available in the HWCAA. I observed the telephone in the HWCAA during the CEI as well as a posting near the telephone with the emergency coordinator's name and phone number, fire department phone number, and locations of fire extinguishers and spill control equipment.

6. Manifests and Biennial Report

CVCMS generated 10 uniform hazardous waste manifests from November 18, 2021, through November 18, 2024. I reviewed all 10 manifests and noted no discrepancies. A copy of the manifest and LDR from the last shipment of hazardous waste, dated September 4, 2024, is included in Attachment 18.

The facility manages hazardous waste according to LQG requirements, including submittal of Hazardous Waste Biennial Reports. The Hazardous Waste Biennial Report for 2023 (Attachment 8) was submitted on February 16, 2024.

7. Preparedness and Prevention

SQG facilities are required by 40 CFR 262.16(b) to meet the emergency preparedness, prevention, and procedures requirements including documented arrangements with response agencies. According to Ms. Thompson, CVCMS is the subject of a regular inspection by the Oskaloosa Fire Department hazardous materials team. During those inspections, she said the fire department is shown the layout of the facility, the location of the hazardous waste HWCAA, and other facility features. Mr. Netland is the designated emergency coordinator for the facility.

CVCMS maintains a RCRA contingency plan. The facility's 15-page contingency plan was last updated on September 28, 2022. The emergency coordinator list in the plan appeared to be current, and a copy of the emergency coordinator list is included as Attachment 19. Because I inspected the facility as a SQG of hazardous waste, I did not review the contingency plan against content requirements of 40 CFR 262.261.

8. Preparedness and Prevention

Personnel training is required by SQG regulations specified in 40 CFR 262.16(b)(9)(iii) to ensure that employees are thoroughly familiar with proper waste handling procedures relevant to their responsibilities. CVCMS provides annual training to personnel who handle and manage hazardous waste. Copies of recent training records for Christopher Gehrig, Dain Netland, Cynthia Thompson, and Andy Thompson, as well as new employee training checklists are included in Attachment 20.

9. Summary of Preliminary Findings

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

- (1) Failure to label five SACs with an indication of the nature of the hazard, as required by 40 CFR 262.15(a)(5)(ii) **(NOPF No. 1)**
- (2) Failure to label 10 HWACs with an indication of the nature of the hazard, as required by 40 CFR 262.16(b)(6)(i)(B) **(NOPF No. 2)**
- (3) Accumulation of universal waste aerosol cans longer than one year, prohibited by 40 CFR 273.15(a) **(NOPF No. 3)**
- (4) Failure to mark a HWAC with an accumulation start date that is visible for inspection, as required by 40 CFR 262.16(b)(6)(i)(A) **(NOPF No. 4)**
- (5) Failure to perform adequate weekly inspections of a HWCAA, as required by 40 CFR 262.16(b)(2)(iv) **(NOPF No. 5)**

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

Clifford A.
Nelles

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A. Nelles
Date: 2025.01.17
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Clifford A. Nelles, Inspector
CLAENE Group

AMBER WHISNANT

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Date: 2025.02.04
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Amber Whisnant, Section Chief
ECAD/CB/RCRA, EPA Region 7

Attachments:

1. Notification Acknowledgement/Verification Report (1 page)
2. Receipt for Documents and Samples (1 page)
3. Confidentiality Notice (1 page)
4. Notice of Preliminary Findings (1 page)
5. Site Map (1 page)
6. Google Earth Aerial Photograph of Facility (1 page)
7. Photographic Documentation (Photolog and 23 Photographs) (15 pages)
8. Copy of 2023 Biennial Report (6 pages)
9. Copy of Waste Profile for Coolant Sludge (1 page)
10. Copy of SDS for Tneme-Glaze Tnemec White (9 pages)
11. Copy of SDS for No. 4 Thinner (10 pages)
12. Copy of SDS for Amercoat 68HS Powder (12 pages)
13. Copy of SDS for Surge Industrial Hard Surface Cleaner (9 pages)
14. Copy of Waste Profile for Parts Washer Fluid (1 page)
15. Copy of Waste Profile for Spent Coolant (1 page)
16. Copy of Fork Truck Invoice from MH Equipment (1 page)
17. Copy of Inspection Log for November 13, 2024 (8 pages)
18. Copies of Manifest and LDR for Shipment on September 4, 2024 (2 pages)
19. Copy of Contingency Plan Emergency Coordinator List (1 page)
20. Copies of Training Records and New Hire Training Checklists (5 pages)