

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

HAGIE MANUFACTURING COMPANY, LLC

721 W. Central Avenue
Clarion, Iowa 50525
(515) 532-2861

EPA RCRA ID No. IAD984593038

On

March 27, 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 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 Hagie Manufacturing Company, LLC (Hagie), at 721 W. Central Avenue, Clarion, 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

Hagie:

Steve Martin, Environmental Manager

Toeroek Team:

John D. Dixon, Inspector, (703) 473-8717

INSPECTION PROCEDURES

Prior to the CEI at Hagie on March 27, 2024, I conducted a drive-by visual inspection. I did not observe any areas of concern during the drive-by inspection. After the drive-by inspection, I entered the visitor's entrance to the East Building and approached the reception desk. I introduced myself to the receptionist and explained the purpose of the CEI. She contacted Mr. Martin to inform him of my arrival. Mr. Martin met me in the reception lobby approximately 5 minutes later. I introduced myself to Mr. Martin and explained the purpose of the CEI. Mr. Martin 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. Martin. 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. Martin 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 he read.

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 contact information (a business card was not available)
- 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
- U.S. EPA Small Business Resources Information Sheet
- Chemical Facility Anti-Terrorism Standards
- E-Manifest Fact Sheet: Generators
- 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. Martin (Attachment 1). I noted that the Verification Report included waste type and quantity for hazardous secondary materials (HSM) management activities. I crossed out the HSM Management Activities section because Hagie no longer manages HSM at the facility. I later

realized that the HSM Management Activities section indicated the reason for notification was “stop,” effective November 30, 2022. I entered “no” in the HSM Management Activities section to clarify that the facility does not currently manage HSM. Based on my review with Mr. Martin and inspection observations, I made no other changes to the Verification Report.

I conducted the visual inspection and records review on March 27, 2024, accompanied by Mr. Martin. During the records review, I reviewed facility documentation such as waste shipping records, waste profiles, Safety Data Sheets (SDS), inspection logs, RCRA Contingency Plan, training records, and written job descriptions. I prepared and completed a site-specific inspection checklist to document my observations.

I conducted an exit briefing on March 27, 2024, with Mr. Martin. During the exit briefing, I provided a Receipt for Documents and Samples, which Mr. Martin signed, acknowledging receipt (Attachment 2). I provided Mr. Martin the Notice, which he signed indicating no confidential business information had been provided (Attachment 3). I also provided Mr. Martin a Notice of Preliminary Findings (NOPF), which he signed to acknowledge receipt (Attachment 4).

Maps of facility were obtained during the CEI and are in Attachment 5. An aerial photograph of the facility was downloaded after the CEI and is in Attachment 6. The 58 photographs taken during the CEI are in Attachment 7; of these, 54 are discussed in this report.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

Hagie is a design/build manufacturer of self-propelled agricultural sprayers and corn detasslers for the John Deere Company. It has been operating at the current location since 1954. According to Mr. Martin, Hagie and the John Deere Company formed a joint venture limited liability corporation (LLC) in 2016, and the facility currently operates as Hagie while integrated within the John Deere Company. Hagie performs manufacturing, while the John Deere Company performs the majority of customer support.

Manufacturing operations include cutting and machining of plate and sheet metal (steel and aluminum), welding, painting in one of three liquid paint booths, and assembly of final products for customer shipment. Touchup painting using aerosol paints is performed as needed following assembly.

The facility consists of two buildings—East Building and West Building. The East Building is primarily offices and production and encompasses approximately 160,130 square feet under roof. The West Building is primarily engineering and support and encompasses approximately 210,800 square feet under roof. Hagie currently employs approximately 300 personnel, who work one 8-hour shift Monday through Friday.

Prior to painting, fabricated components are descaled by use of a five-stage wash process or a wand wash booth. Schematic diagrams of the wash processes are in Attachment 8. Wash water is discharged directly to the sanitary sewer system, with no prior accumulation, for treatment at the

City of Clarion publicly-owned treatment works (POTW). According to Mr. Martin, the discharge is authorized under a pretreatment agreement with the city. The facility considers the wash water to be exempt from the definition of solid waste, per Title 40 *Code of Federal Regulations* (40 CFR) 261.4(a)(1)(ii). Wash water is not discussed further in this report.

Wastes generated during manufacturing include waste paint-related material (WPRM), WPRM solids, waste aerosol cans, waste ink-related materials, spent paint booth filters, laser cutting dust, used coolant and antifreeze, and scrap metal. WPRM consists of spent solvent and paint from paint gun cleaning and paint line flushing. WPRM solids consist of waste personal protective equipment (PPE), paint cups, and other debris from painting operations. Waste aerosol cans are generated during touchup painting activities, and waste ink-related materials are generated during inkjet printing activities. Hagie considers WPRM, WPRM solids, waste aerosol cans, and waste ink-related materials to be hazardous based on product and process knowledge. These wastes are collected in satellite accumulation area (SAA) containers upon generation, and full SAA containers are transferred to the facility's less-than-90-day hazardous waste container accumulation area (HWCAA).

Spent paint booth filters are generated during maintenance of the facility's three paint booths, and laser cutting dust is generated from a dust collector unit providing air pollution control for laser cutting operations. Hagie considers spent paint booth filters and laser cutting dust to be nonhazardous based on product/process knowledge as well as analytical testing. These wastes are collected for landfill disposal under special waste authorizations (SWA) from the Iowa Department of Natural Resources (IDNR).

Used coolant and antifreeze consist of spent metal cutting fluids and antifreeze drained from equipment. Hagie considers used coolant and antifreeze to be nonhazardous based on product and process knowledge. Scrap metal consists of turnings/cuttings as well as scrap pieces from manufacturing operations, and is collected for offsite recycling. The facility considers scrap metal to be exempt from the definition of solid waste per 40 CFR 261.4(a)(13) or exempt from the definition of hazardous waste per 40 CFR 261.6(a)(ii).

Wastes generated during equipment maintenance, facility maintenance, and support operations include used oil, used oil filters, waste batteries, waste lamps, scrap wood, waste cardboard and plastic, used absorbents and shop rags, and general trash. Used oil is managed according to provisions of 40 CFR Part 279, and is collected for offsite recycling. Used oil filters are punctured and hot-drained upon generation, then managed as scrap metal for recycling. Waste batteries and waste lamps are managed as universal waste for recycling according to provisions of 40 CFR Part 273. Scrap wood, waste cardboard and plastic, used absorbents and shop rags, and general trash are considered nonhazardous based on product and process knowledge. Scrap wood and general trash are collected for landfill disposal. Waste cardboard and plastic are baled onsite and transported offsite for recycling. Used absorbents and shop rags are collected for offsite recycling.

On June 22, 2016, Hagie was inspected by EPA as a small quantity generator (SQG) of hazardous waste (generating between 100 and 1,000 kilograms [kg] of hazardous waste per month). During the CEI, the inspector made the following preliminary findings:

- Failure to conduct adequate hazardous waste determinations on WPRM, spent aerosol cans, used oil filters, PPE/gloves, laser cutting dust, disposable paper wipes, and waste coolant
- Failure to make arrangements with local emergency response agencies
- Failure to designate an emergency coordinator for the facility
- Failure to post SQG-required information near a telephone
- Failure to label used oil storage containers with the words “used oil”
- Failure to accumulate universal waste lamps in a closed container
- Failure to accumulate broken waste lamps in a closed container
- Failure to label hazardous waste accumulation containers with an accumulation start date
- Failure to label hazardous waste accumulation containers with an indication of the nature of the hazard
- Failure to keep a SAA container closed
- Failure to perform weekly HWCAA inspections

Of these preliminary findings, failure to keep one SAA container closed was repeated during this CEI.

2. RCRA Status

Hagie 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 Hagie’s LQG status through a review of current operations, interview with Mr. Martin, and a review of waste disposal records (uniform hazardous waste manifests).

According to Mr. Martin, the facility was a SQG of hazardous waste while managing WPRM as HSM. However, Mr. Martin explained that the reclamation process resulted in imperfect solvent product. Hagie discontinued reclamation of WPRM in November 2022 and got rid of the reclamation unit. Currently, the facility manages WPRM as hazardous waste and not HSM.

Hagie submitted its 2023 Hazardous Waste Biennial Report on February 20, 2024 (Attachment 8). Based on the Biennial Report, the facility generated approximately 4,150 pounds (1,882 kg) of hazardous WPRM per month in 2023. According to Mr. Martin, the WPRM generation rate in 2023 is indicative of the current WPRM generation rate. Based on the WPRM generation rate of WPRM alone, I determined that Hagie is operating as a LQG of hazardous waste and inspected the facility as such. I also inspected Hagie 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.

Hagie accumulates hazardous waste in designated SAAs throughout the facility. A list of the facility’s SAAs is in Attachment 10. Full SAA containers are transferred to a dedicated

hazardous waste container accumulation area (HWCAA). I inspected 12 SAAs and the HWCAA during the CEI.

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. Hagie has performed hazardous waste determinations for all wastes generated at the facility. A copy of a spreadsheet with waste profiles, including hazardous waste determinations, is in Attachment 11. The following discussion of waste streams is based on my interview with Mr. Martin, the visual inspection, and my review of available documentation.

WPRM consists of liquid waste paint and solvent generated during paint gun cleaning and paint line flushing in the East Building. Based on the 2023 Hazardous Waste Biennial Report (Attachment 9), the facility generates approximately 4,150 pounds of WPRM per month. Hagie considers WPRM to be hazardous (D001, F003, F005) based on product and process knowledge. Paint guns are cleaned in the Paint Kitchen at a paint gun cleaning station using Axalta 105 Solvent. Paint lines are flushed with PPG Spectraclean Purge. Copies of the SDS for Axalta 105 Solvent and PPG Spectraclean Purge are in Attachments 11 and 12. Based on the SDS information for the solvents and paints, it appears the hazardous waste determination for WPRM is adequate.

WPRM generated during paint gun cleaning is accumulated in a 55-gallon SAA container in the Paint Kitchen. WPRM generated during paint line flushing is directly piped from the paint booths to a 55-gallon SAA container in a flammables cabinet. Full SAA containers are transferred to an outdoor storage trailer that serves as the facility's HWCAA. WPRM is transported to Veolia ES Technical Solutions (Veolia) in Menomonee Falls, Wisconsin, for fuel blending.

During the CEI, I observed a 55-gallon SAA container of WPRM adjacent to the paint gun cleaning station in the East Building Paint Kitchen. The SAA container was near the point of generation, under control of the operator, and structurally sound. It was closed and labeled with the words "hazardous waste" and an indication of the nature of the hazard. The container held approximately 15 gallons of waste. Due to safety concerns regarding a potentially explosive atmosphere, no electronic devices (including cameras) are allowed in the Paint Kitchen. However, I noted no deficiencies with accumulation of WPRM in the Paint Kitchen.

I observed a 55-gallon SAA container for WPRM from paint line flushing in a flammables cabinet at the work station for the East Building paint booths (Attachment 7, Photographs 14, 15, 17, and 18). The SAA container was near the point of generation, under control of the operator, and structurally sound. It was closed and labeled with the words "hazardous waste" and an indication of the nature of the hazard. The container held approximately 30 gallons of waste. I noted that the wrong pre-printed hazardous waste label had been inadvertently affixed to the WPRM container, identifying the waste as waste printing ink-related material. However, because the container identification number (corresponding to WPRM SAA Location 12), hazardous

waste codes, and nature of the hazard were correct, I made no preliminary finding regarding labeling of the SAA container.

I observed seven 55-gallon hazardous waste accumulation containers (HWAC) of WPRM in the facility's HWCAA (Attachment 7, Photographs 19 and 20). The HWACs were structurally sound, closed, labeled with the words "hazardous waste" and the nature of the hazard, and marked with accumulation start dates. The earliest accumulation start date was March 5, 2024. I noted no deficiencies with management of WPRM during the CEI.

WPRM solids consist of waste PPE, paint cups, contaminated wipes, and other debris generated from East Building painting operations and touchup painting areas in the East and West Buildings. Based on the 2023 Hazardous Waste Biennial Report (Attachment 9), the facility generates approximately 204 pounds of WPRM solids per month. Hagie considers WPRM solids to be hazardous (D001, D035, F003, F005) based on product and process knowledge. I asked Mr. Martin about the D035 (methyl ethyl ketone) hazardous waste code for WPRM solids. He explained that the waste code is added due to the potential presence of methyl ethyl ketone in aerosol paints used for touchup applications. WPRM solids are accumulated in 55-gallon SAA containers at six locations throughout the facility. Full SAA containers are transferred to facility's HWCAA. WPRM solids are transported to Veolia in Menomonee Falls, Wisconsin, for bulking and offsite transfer.

During the CEI, I observed a 55-gallon SAA of WPRM solids in the following locations:

- East Building, large paint booth (approximately 40 gallons in accumulation)
- East Building, large paint touchup area (approximately 20 gallons in accumulation)
- East Building, small paint booths (approximately 50 gallons in accumulation)
- East Building, Paint Kitchen (approximately 50 gallons in accumulation)
- East Building, small paint touchup area (approximately 25 gallons in accumulation)
- West Building, touchup area (approximately 25 gallons in accumulation)

Representative photographs of the WPRM solids SAA containers are in Attachment 7, Photographs 6 through 8, 12, and 13. Each of the WPRM solids SAA containers was near the point of generation, under control of the operator, and structurally sound. They were closed and labeled with the words "hazardous waste" and an indication of the nature of the hazard. Each SAA container was closed except for in the East Building, specifically the large paint touchup area SAA container. The lid for this SAA container appeared to be sprung, leaving an approximately 1-inch gap and preventing engagement of the latch (Attachment 7, Photographs 9 through 11). The facility failed to keep a SAA container closed, as required by 40 CFR 262.15(a)(4) (**NOPF No. 1**). I provided compliance assistance regarding management of SAA containers during the CEI.

I observed two 55-gallon HWACs of WPRM solids in the facility's HWCAA (Attachment 7, Photographs 19 and 20). The HWACs were structurally sound, closed, labeled with the words "hazardous waste" and the nature of the hazard, and marked with accumulation start dates. The earliest accumulation start date was March 8, 2024.

Waste aerosol cans consist of empty and unwanted aerosol can products from touchup painting areas in the East and West Buildings. Based on the 2023 Hazardous Waste Biennial Report (Attachment 9), the facility generates approximately 12.5 pounds of waste aerosol cans per month. Hagie considers waste aerosol cans to be hazardous (D001, D035) based on product and process knowledge. Waste aerosol cans are accumulated in 55-gallon SAA containers at three locations at the facility. Full SAA containers are transferred to facility's HWCAA. Waste aerosol cans are transported to Veolia in Menomonee Falls, Wisconsin, for bulking and offsite transfer.

During the CEI, I observed a 55-gallon SAA of waste aerosol cans in the following locations:

- East Building, weld area (approximately 5 gallons in accumulation)
- East Building, assembly area (approximately 15 gallons in accumulation)
- West Building, assembly area (5 waste aerosol cans in accumulation)

Representative photographs of the waste aerosol cans SAA containers are in Attachment 7, Photographs 1, 2, 40 and 41. Each of the waste aerosol cans SAA containers was near the point of generation, under control of the operator, and structurally sound. They were closed and labeled with the words "hazardous waste" and an indication of the nature of the hazard. I noted no deficiencies with accumulation of waste aerosol cans. During the CEI, I provided compliance assistance regarding management of waste aerosol cans as universal waste.

Waste ink-related materials consist of waste ink and contaminated solids (for example, PPE, wipes and containers) generated from operation of the East Building inkjet printer used for labeling. Based on the 2023 Hazardous Waste Biennial Report (Attachment 9), the facility generates approximately 5 pounds of waste ink-related materials per month. Hagie considers waste ink-related materials to be hazardous (D001, D035, F003, F005) based on product and process knowledge. Waste ink-related materials are accumulated in a 5-gallon SAA container adjacent to the inkjet printer. Full SAA containers are transferred to facility's HWCAA. Waste ink-related materials are transported to Veolia in Menomonee Falls, Wisconsin, for bulking and offsite transfer.

During the CEI, I observed a 5-gallon SAA container for waste ink-related materials near the inkjet printer in the East Building (Attachment 7, Photographs 45 and 46). The SAA container was near the point of generation, under control of the operator, and structurally sound. It was closed and labeled with the words "hazardous waste" and an indication of the nature of the hazard. The container was empty at the time of the CEI.

Spent paint booth filters are generated during maintenance of the filters serving the large paint booth and two small paint booths. Hagie considers spent paint booth filters to be nonhazardous based on product/process knowledge and analytical testing. Spent paint booth filters are dry when changed out, and spent solvent is not sprayed onto the filters. The waste is accumulated in an outdoor roll-off container west of the East Building used for accumulation of spent paint booth filters and laser cutting dust. Spent paint booth filters are collected for disposal at the Landfill of North Iowa in Clear Lake, Iowa, under SWA No. 17-SWA-13-09 (Attachment 14). The SWA authorizes landfill disposal of 4,500 pounds of spent paint booth filters per quarter.

During the CEI, I observed the roll-off container for accumulation of spent paint booth filters and laser cutting dust (Attachment 7, Photographs 57 and 58). I noted no deficiencies with management of spent paint booth filters during the CEI.

Laser cutting dust is generated from a dust collector unit providing air pollution control for laser cutting operations. Hagie considers laser cutting dust to be nonhazardous based on product/process knowledge and analytical testing. The waste is accumulated in plastic bags in the dust collector unit, and full bags are transferred to an adjacent 2-cubic-yard roll-off container. Contents of the 2-cubic-yard container are transferred to the outdoor roll-off container west of the East Building used for accumulation of spent paint booth filters and laser cutting dust. Laser cutting dust is collected for disposal at the Landfill of North Iowa in Clear Lake, Iowa, under SWA No. 17-SWA-20-22 (Attachment 15). The SWA authorizes landfill disposal of 585 pounds of laser cutting dust per quarter.

During the CEI, I observed the laser cutting dust collector unit and adjacent 2-cubic-yard accumulation container (Attachment 7, Photographs 32 through 34). I also observed the roll-off container for accumulation of spent paint booth filters and laser cutting dust (Attachment 7, Photographs 57 and 58). I noted no deficiencies with management of laser cutting dust during the CEI.

Used oil is generated during equipment maintenance and support. Hagie manages used oil according to provisions of 40 CFR Part 279. The facility generates an estimated 120 to 200 gallons of used oil per month. Used oil is accumulated in 30-gallon, 55-gallon and 120-gallon used oil storage containers in the East and West Buildings. Used oil is collected by Jebro, Inc. in Sioux City, Iowa, for recycling.

During the CEI, I observed used oil storage containers in the East and West Buildings (Attachment 7, Photographs 35 through 39 and 54 through 56). All used oil storage containers appeared to be structurally sound and were labeled with the words “used oil.” I noted no deficiencies with management of used oil during the CEI.

Used oil filters are generated during equipment maintenance and support. The generation rate could not be determined during the CEI. Used oil filters are punctured and hot drained into a used oil storage container upon generation. Hagie considers punctured and hot drained used oil filters to be nonhazardous and manages the waste as scrap metal. The filters are placed into a scrap metal accumulation container and are collected by Scrap Processors Inc. in Webster City, Iowa, for recycling. I did not observed used oil filters in accumulation during the CEI.

Used coolant and antifreeze consists of used metal cutting fluids and antifreeze generated during equipment maintenance. The generation rate varies, but was estimated at 8,000 pounds per year based on manifest records. Hagie considers used coolant and antifreeze to be nonhazardous based on product and process knowledge. The waste is accumulated in 55-gallon containers near fabrication and assembly areas. Full containers are transferred to the facility’s HWCAA. Used coolant and antifreeze are collected by Veolia in Menomonee Falls, Wisconsin, for bulking and offsite transfer.

During the CEI, I observed a 55-gallon container of used coolant in the East Building fabrication area (Attachment 7, Photograph 28). The container was structurally sound and held approximately 10 gallons of waste. I noted no deficiencies with management of used coolant and antifreeze during the CEI.

Waste batteries are generated during equipment maintenance, and include lead-acid, lithium-ion, and alkaline batteries. Hagie manages all waste batteries as universal waste according to provisions of 40 CFR Part 273. The facility generates approximately 200 to 300 pounds of waste batteries per year based on manifest records. Waste batteries are accumulated in 5-gallon universal waste accumulation containers in the East and West Buildings. Waste batteries are collected from the accumulation containers approximately every two to three months and are transported to Veolia in Port Washington, Wisconsin, for recycling.

During the CEI, I observed three 5-gallon universal waste accumulation containers in the East Building for accumulation of waste batteries. Each container was structurally sound, labeled with the words “used batteries,” and dated March 8, 2024 (Attachment 7, Photographs 3, 4, 42, and 43). I observed one 5-gallon universal waste accumulation container in the West Building for accumulation of waste batteries. The container was structurally sound, labeled with the words “used batteries,” and held approximately 1 gallon of waste batteries (Attachment 7, Photographs 47 and 48). The container was faintly marked with an accumulation start date of May 2, 2021, on the label and no other dates were marked on the container (Attachment 7, Photographs 50, 51, and 53). Based on the May 2, 2021, accumulation start date, it appeared the facility accumulated universal waste batteries for longer than 1 year, prohibited by 40 CFR 273.15(a) (**NOPF No. 2**). I provided compliance assistance regarding management of universal waste accumulation containers during the CEI.

Waste lamps consist of waste 4-foot fluorescent lamps generated during facility maintenance. Hagie manages waste lamps as universal waste according to provisions of 40 CFR Part 273. The facility generates approximately 20 pounds of waste lamps per year based on manifest records. Waste lamps are accumulated in a fiberboard container in the HWCAA. The waste is transported to Veolia in Port Washington, Wisconsin, for recycling.

During the CEI, I observed a universal waste accumulation container for waste lamps in the HWCAA (Attachment 7, Photographs 21 and 22). The container was structurally sound, closed, labeled with the words “used lamps,” and empty. An accumulation start date of August 28, 2023, on the label indicated the date that the new labeling was affixed to the container.

Scrap metal, primarily steel or aluminum, is generated during fabrication. Scrap metal includes turnings/shavings and cuttings, as well as raw scrap pieces and punctured/hot-drained used oil filters. I did not determine the scrap metal generation rate during the CEI. The facility considers scrap metal excluded from the definition of solid waste according to 40 CFR 261.4(a)(13) or excluded from the definition of hazardous waste according to 40 CFR 261.6(a)(ii) when recycled. Scrap metal is accumulated in containers in the East Building fabrication area and transferred to one of three roll-off containers outside of the East Building. Scrap metal is collected by Scrap Processors Inc. in Webster City, Iowa, for recycling.

During the CEI, I observed accumulation of scrap metal in the East Building fabrication area (Attachment 7, Photographs 25 through 27), and in the roll-off containers outside the East Building (Attachment 7, Photographs 29 and 30). I noted no deficiencies with management of scrap metal during the CEI.

Scrap wood consists of broken pallets and other wood scrap with no paint or other coating. I did not determine a generation rate during the CEI. Hagie considers scrap wood to be nonhazardous based on product and process knowledge. Scrap wood is accumulated in small containers in the facility and transferred to a roll-off container outside the East Building (Attachment 7, Photograph 31). Scrap wood is transported to the Landfill of North Iowa in Clear Lake, Iowa, for landfill disposal. I noted no deficiencies with management of scrap wood during the CEI.

Waste cardboard and plastic consists of packaging wastes. I did not determine a generation rate during the CEI. The facility considers waste cardboard and plastic to be nonhazardous based on product and process knowledge. Waste cardboard and plastic are collected in separate accumulation containers and baled in separate compactors (Attachment 7, Photograph 44). The baled waste is transferred to an onsite semi-truck trailer, and transported to LJP Waste Solutions in North Mankato, Minnesota, for recycling. I noted no deficiencies with management of waste cardboard and plastic during the CEI.

Used absorbents and shop rags consist of absorbent pads and shop rags (oily rags) used for general cleaning and spill cleanup of nonhazardous materials or wastes. Absorbents and rags used for cleaning in painting areas are managed separately as WPRM solids hazardous waste. Hagie considers used absorbents and shop rags to be nonhazardous based on product and process knowledge. I did not determine a generation rate during the CEI. Used absorbents and shop rags are accumulated in several containers throughout the facility and are collected by Closed Loop Recycling in St. Louis, Missouri, for recycling.

During the CEI, I observed used absorbents and shop rags in accumulation. The accumulation containers were structurally sound, labeled to identify the contents, and held used absorbents and shop rags that were dry to the touch. No free liquids were observed in the accumulation containers. I noted no deficiencies with management of used absorbents and shop rags during the CEI.

General trash consists of general office type refuse, other than waste cardboard and plastic packaging wastes, generated during production and maintenance. I did not determine a generation rate during the CEI. Hagie considers general trash nonhazardous based on product and process knowledge. General trash is accumulated in several containers throughout the facility and transferred to an onsite compactor. The waste is transported to the Landfill of North Iowa in Clear Lake, Iowa, for landfill disposal. During the CEI, I observed general trash accumulation containers and noted no deficiencies.

4. Required Response Equipment and Hazard Management

Per 40 CFR 262.15(a)(8) and 262.17(a)(6), a LQG must operate to minimize possibility of a fire, explosion, or spill, and must maintain emergency response equipment. During the CEI, I observed adequate aisle space for emergency response in the HWCAA, and no evidence of

spills or leaks (Attachment 7, Photographs 19 and 20). I observed acid neutralizer, absorbent socks, and a fire extinguisher at the HWCAA (Attachment 7, Photographs 23 and 24), and similar emergency response equipment and materials readily available near SAAs. I noted no deficiencies with required response equipment and hazardous management during the CEI.

5. HWCAA

At the time of the CEI, the HWCAA held seven HWACs of WPRM and two HWACs of WPRM solids. Each HWAC was structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and marked with an accumulation start date. The oldest accumulation start date was March 5, 2024.

I asked Mr. Martin if the HWCAA is inspected. He stated that production personnel perform inspections of the HWCAA and Paint Kitchen twice per week. Mr. Martin also performs monthly inspection of all waste accumulation areas. The weekly inspections are documented on checklists and maintained electronically. I reviewed the electronic inspection records for 2022 through 2024 to date and noted no missed inspections or identification of significant findings. Copies of the inspection checklists for January and February 2024 are in Attachment 16. I noted no deficiencies with management of HWACs in the HWCAA during the CEI.

6. Manifests, Bills of Lading, Biennial Report

Hagie generated approximately 45 uniform hazardous waste manifests over the past 3 years. I reviewed approximately 30 manifests and associated LDR notifications during the CEI (including all 2024 and 2023 manifests and approximately half of the remaining manifests). Copies of all manifests and LDR notifications from 2024 to date are in Attachment 17. I also reviewed the facility’s 2023 Hazardous Waste Biennial Report (Attachment 9). I noted no deficiencies during my review of manifests and the Biennial Report.

7. 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. During the CEI, I discussed personnel training requirements with Mr. Martin. He explained that all personnel receive initial and annual RCRA Awareness training. Some job positions, such as Paint Supervisor and Paint Waste Handler, receive additional RCRA job-specific training annually. Mr. Martin showed me job descriptions for paint personnel electronically, and I noted the job descriptions included qualifications and duties required. He provided a copy of an environmental training matrix that indicates the training provided for each job position (Attachment 18). He also provided a copy of the 2023 training tracking database filtered by job positions that handle hazardous waste (Attachment 19).

I reviewed content of the RCRA Awareness training during the CEI. The training covered topics such as waste identification, management, labeling, and emergency response. I also reviewed electronic copies of sign-in sheets and tests documenting training performed in 2022 and 2023. According to Mr. Martin, training was not performed in 2021 due to the COVID-19 pandemic.

8. Preparedness and Prevention and Contingency Plan

As a LQG, Hagie 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. Hagie's RCRA Contingency Plan was last updated September 29, 2023. A copy of the Contingency Plan is in Attachment 20.

I noted the Contingency Plan included a description of actions needed to respond to fires, explosions, and spills; a description of arrangements with the local emergency agencies; a list of emergency response equipment (including capabilities and location); and a complete evacuation plan with a description of the signals used, as required by 40 CFR 262.17(a)(6) referencing 262.261(a, c, e, and f). The Contingency Plan also included names and telephone numbers of the primary EC (Mr. Martin) and alternate EC, as required by 40 CFR 262.17(a)(6) referencing 262.261(d).

I also reviewed the facility's Quick Reference Guide, required by 40 CFR 262.17(a)(6) referencing 262.262(b). The Quick Reference Guide included a list with descriptions and maximum quantities of hazardous wastes onsite; identification of special hazards; maps showing hazardous wastes locations, overall facility location, and water supplies; identification of notification systems; and EC contact information. A copy of the facility's Quick Reference Guide, updated September 29, 2023, is in Attachment 21. The RCRA Contingency Plan and Quick Reference Guide were sent to emergency response agencies via email, and Mr. Martin showed me the emails and email responses that the facility retains to document submittal. I noted no deficiencies regarding preparedness and prevention or with content of the Contingency Plan and Quick Reference Guide during the CEI.

9. Air Emissions: 40 CFR Part 265 Subparts AA, BB, CC

EPA regulations in 40 CFR Part 265, Subparts AA, BB, and CC apply to LQGs. If a LQG manages hazardous waste with an organic concentration greater than 10 parts per million by weight (ppmw), the standards specified in Subpart AA apply to hazardous waste air emissions from certain process vents. A process vent used in distillation, fractionation, solvent extraction, thin-film evaporation, air stripping, or steam stripping is regulated by Subpart AA. Hagie is not subject to the Subpart AA regulations because the facility does not have any of the process vents listed above.

If a LQG has equipment that contains or contacts hazardous waste composed of 10 percent or greater organics by weight, the facility is subject to Subpart BB standards for inspection and monitoring of the equipment. Hagie is not subject to the Subpart BB regulations because it does not have equipment that contains or comes in contact with hazardous waste.

The standards found in Subpart CC apply to LQGs that manage hazardous waste in containers with organic compounds (VOC) concentration that exceeds 500 ppmw. The Subpart CC standards are applicable because the facility accumulates hazardous waste that contains VOCs in 55-gallon hazardous waste accumulation containers. During the CEI, I determined that Hagie meets the Subpart CC requirements for containers by using Container Level 1 controls (hazardous waste accumulation containers smaller than 122 gallons that are Department of

Transportation [DOT]-approved). I noted no concerns with management of hazardous waste per the Subpart CC air emissions requirements.

10. Summary of Preliminary Findings

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

1. Failure to keep one SAA container closed, as required by 40 CFR 262.15(a)(4) **(NOPF No. 1)**
2. Accumulation of universal waste batteries for longer than 1 year, prohibited by 40 CFR 273.15(a) **(NOPF No. 2)**

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.

John D.
Dixon

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John D. Dixon
Inspector
CLAENE Group, LLC.

EDWIN
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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. Notice of Preliminary Findings (1 Page)
5. Facility Map (2 Pages)
6. Google Earth Aerial Photograph (1 Page)
7. Photographic Documentation (58 Photos and Photolog) (34 Pages)
8. Wash Process Schematics (2 Pages)
9. Hazardous Waste Biennial Report for 2023 (7 Pages)
10. List of SAA Locations (1 Page)
11. Hazardous Waste Determinations Spreadsheet (3 Pages)
12. SDS for Axalta 105 Solvent (16 Pages)
13. SDS for Spectraclean Purge (15 Pages)
14. SWA for Spent Paint Booth Filters (1 Page)
15. SWA for Laser Cutting Dust (1 Page)
16. Inspection Checklists for January and February 2024 (2 Pages)
17. 2024 Manifests (16 Pages)
18. Environmental Training Matrix (1 Page)
19. 2023 Training Database (1 Page)
20. RCRA Contingency Plan (11 Pages)
21. Quick Reference Guide (7 Pages)