

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

WINNEBAGO INDUSTRIES INC

1100 11th Street
Charles City, Iowa 50616
641-585-6760

EPA ID Number: IAR000006635

On

June 26, 2023

By

TOEROEK ASSOCIATES, INC.

For

U. S. ENVIRONMENTAL PROTECTION AGENCY

Region 7

Enforcement and Compliance Assurance Division

INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division/Chemical Branch/RCRA Section (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 Winnebago Industries Inc (Winnebago) at 1100 11th Street, Charles City, Iowa. The CEI was conducted under the authority of Section 3007 of 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

Winnebago:

Wayne Venzke, Plant Engineer

Jeff Faulkner, Manufacturing Engineer

Brittany Ross, Environmental Health and Safety

Paul Lokenvitz, Lead

Toeroek Team:

Clifford Nelles, Inspector, 816-213-5192

INSPECTION PROCEDURES

Prior to the CEI at Winnebago on June 26, 2023, I conducted a drive-by visual inspection. I did not observe any areas of concern during the drive-by. At approximately 7:50 a.m., I entered the facility and was met by Mr. Faulkner. After brief introductions, I explained the purpose and scope of the CEI to Mr. Faulkner. Mr. Faulkner contacted Mr. Venzke, and explained to me that Mr. Venzke was coming from corporate headquarters in Forest City, Iowa, and would join the inspection in approximately 1 hour. Mr. Faulkner and I then adjourned to a conference room where I proceeded to conduct an entry briefing with him.

During the entry briefing, I presented my business card and EPA credentials to Mr. Faulkner. 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. Faulkner 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. Faulkner with 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 were read.

A copy of each of the following documents was left with Mr. Venzke during the inspection:

- RCRA Facility Access Information Sheet
- Mr. Trevor Urban's business card
- 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
- 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 Notification Acknowledgement/Verification Report (Verification Report) with Mr. Faulkner (Attachment 1). Based on this review, I changed the facility's hazardous waste generator status from large quantity generator (LQG) to small quantity generator (SQG). I also changed the section of the Verification Report to indicate the facility is not a marketer who first claims used oil meets fuel specifications.

I conducted a visual inspection of the facility. Mr. Faulkner accompanied me during the visual inspection until Mr. Venzke arrived. Ms. Ross participated in the CEI during inspection of the vault, and Mr. Lokenvitz participated during inspection of the stain booth. Following the visual inspection, I reviewed facility records including hazardous waste manifests with land disposal restriction (LDR) notifications, safety data sheets (SDS), 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 Mr. Venzke and Ms. Ross. During the exit briefing, I provided a Receipt for Documents and Samples, which Mr. Venzke signed, acknowledging receipt (Attachment 2). I provided Mr. Venzke the Notice, which he signed indicating no confidential business information had been provided (Attachment 3). I also provided Mr. Venzke a Notice of Preliminary Findings (NOPF) which he signed to acknowledge receipt (Attachment 4).

Maps of the facility obtained during the CEI are included in Attachment 5, and a Google Earth aerial photograph of the facility is included as Attachment 6. The 18 photographs taken during the CEI are included in Attachment 7, of which 17 are described in this report.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

Winnebago assembles interior components and manufactures wooden cabinets for recreational vehicles (RV) manufactured at the main Forest City, Iowa, facility. Operations at Winnebago's facility include milling, cutting, and sanding of wood; application of stains, glazes, and topcoats; lamination of wood parts; and other assembly. Winnebago began operations at this location in 1999 and currently has approximately 60 employees. The facility operates one shift, Monday through Friday, from 6:00 a.m. to 2:30 p.m. The facility consists of two buildings—the Hardwoods building (approximately 100,000 square feet), where cabinets are manufactured, and the Assembly building (approximately 50,000 square feet), where other interior components are assembled. Most hazardous waste (waste paint-related materials [WPRM] and used glaze wipes) is generated and managed in the Hardwoods building.

Winnebago receives raw lumber, which is cut to size and sanded. Woodworking operations generate bulk wood pieces and sawdust, both of which are sold to Koster Grain in Carroll, Iowa, to manufacture animal bedding. The facility does not consider this material to be waste. Wood pieces are sometimes laminated with oak or cherry laminate. According to Mr. Faulkner, laminating equipment is cleaned with either water or a mixture of water and ethyl alcohol (a cleaner that binds to the laminating glue). Mr. Faulkner said that the urethane glue cleaning mixture is allowed to solidify, and then is consolidated with the general trash. The facility

considers this glue mixture nonhazardous, and the generation rate is not tracked. This waste is not discussed further in this report.

The wood is finished with stain and glazes. The facility has three spray booths where stain, sealer, and topcoat are applied with handheld spray guns. The parts are dried in an oven between steps. The facility also has a fourth booth used for touch-up, rework, or finishing of odd-sized or odd-shaped parts. Paint guns are cleaned by running isobutyl acetate through the guns and discharging it to a satellite accumulation container (SAC) in each booth. This spent solvent and unused mixed paint are consolidated into a single WPRM waste stream, considered hazardous. Maintenance of the ventilation system in the spray booths generates used stain filters, considered hazardous. Subsets of wooden parts are finished with glazes between the sealer and topcoat steps to impart an antique finish. The wipes/rags used to apply the glazes also are considered hazardous waste.

Most maintenance waste is accumulated in the Assembly building. Facility equipment maintenance and repair generates used oil, which the facility manages according to Title 40 *Code of Federal Regulations* (40 CFR) Part 279. According to Mr. Faulkner, used oil consists only of compressor or hydraulic oil and filters; facility forklifts and other vehicles are maintained on site by a contractor that takes used lubricating oil and oil filters away when service is complete. The facility does not know how used oil and oil filters are managed by the contractor after removal from the facility. Equipment maintenance also generates used aerosol cans, which are punctured to generate WPRM and scrap metal. The WPRM is considered hazardous and managed with the other WPRM generated during staining processes. Scrap metal from punctured aerosol cans and other maintenance activities is recycled. The facility also has a parts washer, which generates nonhazardous used parts washer solvent. The facility converted all of their lighting to light emitting diode (LED) in 2020 and does not generate universal waste lamps. Used batteries generated by equipment maintenance are managed as universal waste according to 40 CFR Part 273. General trash, considered nonhazardous by the facility, is collected for landfill disposal.

Winnebago was last inspected by an EPA contractor on July 17, 2018, as a SQG of hazardous waste (generating between 100 and 1,000 kilograms [kg] of hazardous waste per month). The inspector made the following preliminary findings:

- Failure to label 10 SACs with the words “hazardous waste,” as required by 40 CFR 262.15(a)(5)(i)
- Failure to label eight SACs with the nature of the hazard, as required by 40 CFR 262.15(a)(5)(ii)
- Failure to mark two hazardous waste accumulation containers (HWACs) with accumulation start dates, as required by 40 CFR 262.16(b)(6)(i)(C)
- Failure to conduct weekly inspections of HWACs, as required by 40 CFR 262.16(b)(2)(iv)
- Failure to post emergency contact information and location of response equipment by the telephone, as required by 40 CFR 262.16(b)(9)(ii)

Of these preliminary findings, failure to mark a HWAC with an accumulation start date and failure to post emergency contact information were repeated during this CEI.

2. RCRA Status

The Verification Report (Attachment 1) indicates that Winnebago is registered with EPA, under EPA ID IAR000006635, as a LQG of hazardous waste, generating more than 1,000 kilograms (kg) or 2,200 pounds of hazardous waste per month. I reviewed the 2021 Biennial Report summary provided by the EPA before the inspection (Attachment 8), as well as manifests and a hazardous waste tracking spreadsheet for wastes shipped from 2022 to date. A copy of the hazardous waste tracking spreadsheet for calendar years 2020 through 2022 is included in Attachment 9.

The facility generates four hazardous waste streams—WPRM, aerosol cans, waste stain filters and gloves, and used glaze rags. According to the hazardous waste tracking spreadsheet (Attachment 9), the facility shipped a total of 13,723 pounds (6,225 kg) of these four hazardous wastes in 2021 and 9,865 pounds (4,475 kg) in 2022. The wastes are generated relatively consistently throughout the year; therefore, I estimated a monthly hazardous waste generation rate of 1,144 pounds (519 kg) per month in 2021 and 822 pounds (373 kg) per month in 2022. Based on current operations, interviews with facility personnel, and my review of waste disposal records, I concluded that Winnebago is currently operating as a SQG of hazardous waste (generating more than 220 pounds [100 kg] and less than 2,200 pounds [1,000 kg] per month) and inspected the facility as such.

I initially included NOPF No. 1 for failure to track specific job titles and names of persons filling positions [40 CFR 262.17(a)(7)(iv)(A)] and NOPF No. 2 for failure to describe in writing skills, education, or qualifications and duties associated with each job title on the NOPF form left at the facility during the CEI. However, these requirements are not applicable for SQG facilities, and the preliminary findings were rescinded after the CEI.

Based on the quantities of universal batteries accumulated onsite between shipments, it appears that Winnebago is operating below the small quantity handler (SQH) accumulation threshold of 5,000 kilograms (11,000 pounds) of universal waste onsite at any time. Therefore, I inspected Winnebago as a SQH of universal waste.

Winnebago generates used oil during routine maintenance of equipment, including compressors, pumps, and hydraulic equipment. Therefore, I also inspected Winnebago as a generator of used oil.

3. Waste Streams

This section of the CEI report describes the waste streams generated by the facility, including the facility's waste determination and waste codes, generation process and rate, management at the facility, and ultimate disposition. The following discussion of waste streams is based on conversations with facility representatives, the visual inspection, and my review of waste shipping documents. Mr. Faulkner accompanied me during the visual inspection until

Mr. Venzke arrived. All inspection participants were provided a copy of U.S. Federal Codes 1001 and 1002, which they read.

Waste paint related material (WPRM) consists of mixed solvent and stain generated during cleaning of spray guns and brushes, and mixed stain and finish coats that cannot be used. It also includes residues drained from punctured aerosol cans from the Hardwoods building that contained paints and lubricants. The facility considers WPRM hazardous (D001, D018, D035) based on product and process knowledge. Copies of the SDS for commonly-used products (SHER-WOOD KEMVAR Conversion Varnish, Acrylic CV Gun Metal Dull Rubbed, and Isobutyl Acetate) are included as Attachments 10 through 12. During production, WPRM generated during cleaning of spray guns is accumulated in a 2-gallon SAC in each booth. The SACs are emptied daily into a 55-gallon HWAC in a flammable cabinet. Based on the hazardous waste spreadsheet in Attachment 9 and 2023 waste manifests, Winnebago generates approximately 694 pounds of WPRM per month. The waste is transported to Tradebe Treatment and Recycling in East Chicago, Indiana (Tradebe), for fuel blending.

During the CEI, I did not observe any WPRM SACs in the paint and stain line booths because the paint and stain lines were not operating and had not been operating for approximately 2 weeks. The 2-gallon SACs for collection of WPRM were emptied after last use and removed from the spray booths until painting/staining operations resumed.

I observed a flammable cabinet adjacent to the stain booth (Attachment 7, Photograph 17). When painting and staining is performed, the 2-gallon SACs are emptied daily into a 55-gallon container in the flammable cabinet (Attachment 7, Photograph 18). The facility considers the 55-gallon container to be a SAC. However, the 55-gallon container is not within eyesight of the spray booth operators who generate the waste, and the container receives waste from three spray booths. I explained to Messrs. Venzke and Lokenvitz that because the 55-gallon container did not appear to be under control of the operator, received waste from three points of generation, and received waste from SACs, it did not appear to meet the definition of a SAC. Therefore, I inspected the 55-gallon container as a HWAC.

The HWAC was structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and held approximately 10 gallons of WPRM. However, since the facility considered the container to be a SAC, it was not marked with an accumulation start date. I determined the facility failed to mark a HWAC with an accumulation start date, as required 40 CFR 262.17(a)(5)(i)(C) (**NOFF No. 3**). Based on the date on the HWAC of WPRM in the main hazardous waste container accumulation area (HWCAA) at the vault (June 12, 2023), the WPRM HWAC in the flammable cabinet had been accumulating WPRM for less than one month. I provided compliance assistance regarding the definition of SAC and management of HWACs during the CEI.

I observed one 55-gallon HWAC of WPRM at the vault HWCAA. The HWAC was structurally sound, closed, full, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and dated June 12, 2023. I inadvertently neglected to take photographs of the HWACs at the vault HWCAA; however, I noted no deficiencies with management of HWACs at the vault HWCAA.

Aerosol cans are generated during touch-up painting, assembly, and maintenance operations in the Hardwoods building (D001). Aerosol cans of paint and lubricant are used until they meet the RCRA definition of “empty.” They are then punctured and drained at a SAC between bay locations D13 and E13. Punctured and drained aerosol cans are considered scrap metal and are collected for offsite recycling. Aerosol residue drained from the cans is considered hazardous (D001) based on product and process knowledge. The waste is managed at the facility and tracked in facility records as WPRM. The waste is transported to Tradebe for fuel blending.

Aerosol cans generated in the Assembly building cannot be punctured and drained because the cans contain an adhesive which plugs the puncturing/draining device. These aerosol cans are managed intact, and are considered hazardous (D001) based on product and process knowledge. Aerosol cans from the Assembly building are accumulated in a 55-gallon HWAC in the vault HWCAA. Based on the hazardous waste spreadsheet in Attachment 9 and 2023 waste manifests, Winnebago generates approximately 65 pounds aerosol cans from the Assembly building per month. The waste is transported to Tradebe for bulking and transfer.

During the CEI, I observed a 55-gallon SAC for aerosol residue drained from Hardwoods building aerosol cans between bay locations D13 and E13 (Attachment 7, Photographs 7 and 8). The SAC was near the point of generation, under control of the operator, structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and held approximately 50 gallons of waste. I observed a second 55-gallon SAC adjacent to the in-use SAC (Attachment 7, Photographs 5 and 6). This second container was empty and available to replace the in-use SAC when the in-use container is transferred to the vault HWCAA. I noted no deficiencies with satellite accumulation of aerosol can wastes.

I also observed one 55-gallon HWAC of aerosol cans from the Assembly building at the vault HWCAA. The HWAC was structurally sound, closed, full, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and dated April 4, 2023. I inadvertently neglected to take photographs of the HWACs at the vault HWCAA; however, I noted no deficiencies with management of HWACs at the vault HWCAA.

Waste stain filters and gloves (WSF) are generated in the stain booths. The facility considers WSF hazardous (D001) based on product and process knowledge. The filters are removed when they become unusable and are accumulated in 55-gallon HWACs in the vault HWCAA. Based on the hazardous waste spreadsheet in Attachment 9 and 2023 waste manifests, Winnebago generates approximately 280 pounds of WSF per month. The waste is transported to Tradebe for solvent recovery.

During the CEI, I observed a 5-gallon SAC for WSF adjacent to the topcoat booth (Attachment 7, Photograph 16). The SAC was near the point of generation, under control of the operator, structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and held approximately two gallons of waste gloves. I noted no deficiencies with satellite accumulation of WSF.

I also observed one 55-gallon HWAC of WSF at the vault HWCAA. The HWAC was structurally sound, closed, full, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and dated June 22, 2023. I inadvertently neglected to take photographs of the HWACs at the vault HWCAA; however, I noted no deficiencies with management of HWACs at the vault HWCAA.

Used glaze rags (UGR) are generated when antiquing glazes are rubbed off cabinets receiving this special finish. The facility considers UGR hazardous (D001) based on product and process knowledge. The waste is accumulated in SACs near the vault HWCAA, which is adjacent to the antiquing area. Based on the hazardous waste spreadsheet in Attachment 9 and 2023 waste manifests, Winnebago generates approximately 75 pounds of UGR per month. The waste is transported to Tradebe for solvent recovery.

During the CEI, I observed two 55-gallon SACs for UGR near the vault HWCAA adjacent to the antiquing area (Attachment 7, Photographs 3, 4, and 9). The SACs served two different areas of the antiquing area, and were near the points of generation. The SACs were under control of the operator, structurally sound, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and closed. One SAC held approximately 9 gallons of UGR, and the other held approximately 15 gallons of UGR. I noted no deficiencies with satellite accumulation of UGR.

I also observed four 55-gallon HWACs of UGR at the vault HWCAA. The HWACs were structurally sound, closed, full, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and dated. The earliest accumulation start date was May 30, 2023. I inadvertently neglected to take photographs of the HWACs at the vault HWCAA; however, I noted no deficiencies with management of HWACs at the vault HWCAA.

Used oil is generated during maintenance of facility equipment (primarily compressors and hydraulic equipment), and includes used oil and used oil filters. The facility manages both wastes as used oil per requirements of 40 CFR Part 279. Mr. Faulkner said that used oil is collected approximately once a year. He estimated that the facility generates between 55 and 110 gallons of used oil per year. The used oil is collected by Tradebe for recycling.

During the CEI, I observed two 55-gallon used oil storage containers in the vault (Attachment 7, Photographs 10 and 11). One container held approximately 10 gallons of used oil and the other held approximately 10 gallons of used oil filters. The used oil storage containers appeared to be structurally sound with no damage or apparent leaks, and were labeled with the words “used oil” or “used oil filters,” as appropriate. I noted no deficiencies with management of used oil during the CEI.

Glue hot melt (GHM) is generated during lamination of layers of counter top material. The facility considers GHM to be hazardous (D001) based on product and process knowledge. Copies of the SDSs for DuPont Joint Adhesive and HYSOL III (P-190) are included as Attachments 13 and 14. The facility generates less than 1 gallon of GHM per week, and has not shipped waste GHM off site for more than three years.

During the CEI, I observed a 55-gallon SAC for GHM at bay location E9 (Attachment 7, Photographs 1 and 2). The SAC was near the point of generation, under control of the operator, structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and held approximately 25 gallons of waste. I noted no deficiencies with management of GHM during the CEI.

Waste batteries are generated during equipment maintenance. Waste batteries are primarily alkaline and lithium-ion batteries; however, other batteries such as nickel-cadmium batteries are occasionally generated. The facility manages all waste batteries as universal waste batteries per requirements of 40 CFR Part 273. Waste batteries are accumulated in 5-gallon universal waste accumulation containers in the maintenance shop. These waste batteries are collected by Retrofit Recycling in Owatonna, Minnesota, for recycling. A copy of a bill of lading from Retrofit Recycling, dated September 20, 2022, is included as Attachment 15.

During the CEI, I observed three universal waste batteries accumulation containers in the maintenance shop (Attachment 7, Photographs 12 through 14). The 5-gallon accumulation containers were labeled with the words “universal waste batteries,” dated October 7, 2022, and held approximately 2 to 4 gallons of waste batteries each. I noted no deficiencies with management of waste batteries during the CEI.

Spent parts washer solvent is generated by the servicing of the parts washer in the maintenance shop by Safety-Kleen. The parts washer is used to clean oily steel parts during repair of manufacturing equipment. The facility considers spent parts washer solvent nonhazardous based on product and process knowledge. A copy of the SDS for the parts washer solvent, Safety-Kleen Premium Solvent, is included as Attachment 16. Based on the SDS, the waste determination appears to be adequate. The parts washer is serviced approximately every six months, generating approximately 15 gallons of spent parts washer solvent at each servicing. I did not observe spent parts washer solvent in accumulation during the CEI.

General trash is generated during facility maintenance and manufacturing. The facility has determined that general trash is nonhazardous based on product and process knowledge. General trash includes, but is not limited to, floor sweepings, paper, and cardboard packaging. General trash is collected by Jendro Sanitation of Charles City, Iowa, and transported to the Floyd-Mitchell-Chickasaw (FMC) landfill in Elma, Iowa. 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)(8), 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 such as 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 Areas

Winnebago maintains two HWCAAs—the main vault HWCAA and flammable cabinet HWCAA at the stain booth. During the CEI, I observed seven HWACs in the vault HWCAA. All seven HWACs were structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and dated. The earliest accumulation start date was April 4, 2023.

The vault HWCAA was maintained with adequate aisle space. I asked Ms. Ross if the HWCAA was inspected. She stated that the HWCAA was inspected on a weekly basis. I asked her if they maintained an inspection log and she confirmed that a log is maintained. During the records review, I observed the inspection log for the last three years and noted no missed inspections. A copy of the inspection log for June 23, 2023, is included as Attachment 17. I asked Ms. Ross how someone would summon emergency assistance. She stated that everyone who handles hazardous waste carries a company-supplied cell phone. I noted no deficiencies in the handling of the hazardous waste in the vault HWCAA.

The flammable cabinet at the stain booth held one HWAC of WPRM. This HWAC is discussed in Section 3 of this report. According to Ms. Ross, the HWAC in the flammable cabinet is included in the weekly inspections along with all of the SACs.

6. Manifests

Winnebago generated manifests for 22 hazardous waste shipments from June 26, 2020, to June 26, 2023. During the CEI, I reviewed all of the manifests and LDR notifications for these 22 shipments. Copies of all manifests for hazardous waste shipments in 2023 are included in Attachment 18. I noted no deficiencies during my review of manifests and LDR notifications.

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 Mr. Venzke, Winnebago is the subject of a regular inspection by the Charles City Fire Department hazardous materials team. He explained the fire department is shown the layout of the facility, the location of the hazardous waste HWCAAs, and other facility features during inspections.

Mr. Tim Parcher (Plant Manager) is the Emergency Coordinator. A copy of the list of Emergency Coordinators is included as Attachment 19. During the CEI, I did not observe a posting of the emergency coordinator’s name and phone number, fire department’s phone, and locations of fire extinguishers and spill control equipment near a phone as required by 40 CFR 262.16(b)(9)(ii) (**NOPF No. 4**). Winnebago manages the facility as a LQG complete with contingency plan, quick reference guide, annual training, and job descriptions.

NOPF No. 4 was not on the NOPF left with the facility but was added on July 6, 2023. Mr. Venzke was notified by email on July 6, 2023.

8. Personnel Training Requirements

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. Included in Attachment 20 is the 2022 training record for Mr. Lokenvitz, who conducts the weekly inspections and signs the manifests.

During the CEI, I added NOPF No. 1 for failure to track specific job titles and names of persons filling positions [40 CFR 262.17(a)(7)(iv)(A)] and NOPF No. 2 for failure to describe in writing skills, education, or qualifications and duties associated with each job title [40 CFR 262.17(a)(7)(iv)(B)]. However, both of these preliminary findings reflect LQG requirements and are not applicable for SQG facilities. NOPF Nos. 1 and 2 were rescinded on July 6, 2023, and Mr. Venzke was notified by email on July 6, 2023.

9. Summary of Preliminary Findings

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

- NOPF No. 1 – Rescinded
- NOPF No. 2 – Rescinded
- Failure to mark an accumulation start date on a hazardous waste accumulation container, as required by 40 CFR 262.17(a)(5)(i)(C) (**NOPF No. 3**)
- Failure to post emergency coordinators name and phone number, fire department's phone number, and locations of fire extinguishers and spill control equipment near a phone, as required by 40 CFR 262.16(b)(9)(ii) (**NOPF No. 4**)

Numbers 3 and 4 are repeated from the previous inspection when Winnebago was inspected as a SQG.

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

Digitally signed by Clifford
A. Nelles
Date: 2023.08.14
16:33:16 -05'00'

Date: _____

Clifford A. Nelles, Inspector
CLAENE Group

Whisnant,
Amber

Digitally signed by
Whisnant, Amber
Date: 2023.08.25
16:09:25 -05'00'

Date: _____

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 Maps (2 pages)
6. Google Earth Aerial Photograph (1 page)
7. Photographic Documentation (Photolog and 18 Photographs) (12 pages)
8. Copy of 2021 Biennial Report Summary (6 pages)
9. Copy of Hazardous Waste Spreadsheet (3 pages)
10. Copy of SDS for Sherwood Kemvar Conversion Varnish (21 pages)
11. Copy of SDS for Acrylic CV Gun Metal Dull Rubbed (23 pages)
12. Copy of SDS for Isobutyl Acetate (7 pages)
13. Copy of SDS for DuPont Joint Adhesive-Component A (15 pages)
14. Copy of SDS for Hysol III (P-190) (8 pages)
15. Copy of Bill of Lading from Retrofit Recycling dated September 20, 2022 (1 page)
16. Copy of SDS for Safety-Kleen Premium Solvent (9 pages)
17. Copy of Inspection Log dated June 23, 2023 (1 page)
18. Copies of 2023 Manifests (3 pages)
19. Copy of Emergency Coordinators List (1 page)
20. Copy of Training Record for Paul Lokenvitz (1 page)