

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

SERVICE TRUCKS INTERNATIONAL

877 1st Ave NW
Sioux Center, Iowa 51250
(712) 722-3711

EPA ID Number: IAD984588384

On

March 19, 2024

By

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 7
Enforcement and Compliance Assurance Division

1.0 INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division (ECAD), I conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Service Trucks International, located in Sioux Center, Iowa, on March 19, 2024. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. During the inspection I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. This inspection report and attachments present the results of the CEI.

2.0 PARTICIPANTS

Service Trucks International:

- Walt Van Laren, President, (33 years with company)
- Steve Schuld, Maintenance Supervisor (4 years with company)

EPA:

- Mark Holcomb, Civil Investigator/Inspector (SEE)

3.0 INSPECTION PROCEDURES

On March 19, 2024, I arrived unannounced at the facility's main entrance at about 0900 hours. Initially, I conducted a visual reconnaissance of the facility searching for areas of concern observable from the adjacent public roadways and parking lots. I identified no environmental issues or concerns during this preliminary examination. I entered the facility through the main entrance and stopped at the front office area. I introduced myself and asked for the facility manager. I was introduced to Mr. Walt Van Laren (President). Mr. Van Laren escorted me to a

conference room. Mr. Van Laren stated that the primary contact for hazardous waste was Ms. Kim Van Zee (Vice President), but she was not available for the inspection. Mr. Van Laren stated that he and Mr. Steve Schuld (Maintenance Supervisor) would assist with the inspection and answer questions. Mr. Van Laren stated that the only items of personal protective equipment required for our visual inspection were eye protection and hearing protection in limited areas.

At the opening conference, I presented my EPA ID and credentials to Mr. Van Laren. I next explained the purpose and procedures of the inspection. I then presented him with a copy of RCRA Section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented him with a copy of Title 18 U.S. Code, Sections 1001 and 1002. He was made aware of his confidentiality rights, and I informed him that a Confidentiality Notice would be provided at the end of the inspection to make a confidentiality claim if he so desired. Messrs. Van Laren and Schuld acted as the official facility representatives during the inspection.

The CEI consisted of a discussion of facility operations, waste generation, and waste management; a visual inspection of active waste generation and management areas; and a review of waste management records and documents.

I conducted a visual inspection of the following areas:

- Agricultural (Ag) Repair
- Machining
- Used Oil Storage Room (Cave)
- Laser Room
- Outside South Lot

See Attachment #1 for the aerial/map views and facility diagram. Document photocopies and photographs were collected as inspection documentation (see Attachments #1-9 and Photos 1-12). The photo log is included as Attachment #2. Information collected during the inspection is documented on an Entry/Exit checklist, the hazardous waste compliance checklists, and in a notebook. I reviewed documents including the following: Safety Data Sheets (SDS), bills of lading, and invoices. I followed the inspection procedures detailed in the RCRA CEI Standard Operating Procedure 2321.01E, unless noted otherwise.

At the conclusion of the inspection, I provided Mr. Van Laren with a Receipt for Documents (see Attachment #3) and a Confidentiality Notice (see Attachment #4), which he signed as acknowledgement of receipt. No claim of confidential business information was made by Mr. Van Laren. On the Notice of Preliminary Findings (NOPF) form, I indicated that there were no preliminary findings observed at the time of the inspection, however, further EPA review may include findings. I left a copy of the NOPF form with the instructions of how to respond if any findings are added post inspection (see Attachment #6). I provided inspection and compliance assistance documents to Mr. Van Laren during the inspection, some as paper versions and some in electronic PDF via email post-inspection, that included the following:

- *RCRA Section 3007(a) (EPA Handout)*
- *Title 18 U.S. Code, Sections 1001 and 1002 (EPA Handout)*
- *Confidentiality Notice (Top page of the completed carbonless transfer set)*
- *Notice Regarding Proprietary/Confidential Business Information Submitted to or*

Collected by EPA In Connection with Inspections (EPA Handout)

- *Receipt for Documents and Samples (Top page of the completed carbonless transfer set)*
- *NOPF with Instructions for Responding on back of form (top page of the completed carbonless transfer set)*
- *U.S. EPA Small Business Resource Information Sheet (EPA Handout)*
- *Solvent-Contaminated Wipes Final Rule Chart (EPA Handout)*
- *Recycling Electronics (Iowa Department of Natural Resources – IDNR Handout)*
- *Lead-Based Paint Activities (IDNR Handout)*
- *Excluded Solvent-Contaminated Wipe Rule (IDNR Handout)*
- *Battery Recycling/Disposal (IDNR Handout)*
- *Management of Fluorescent Lamps for Businesses (IDNR Handout)*
- *Incompatible Chemicals (IDNR Handout)*
- *Universal Wastes Including Aerosol Cans (IDNR Handout)*
- *TCLP Waste Determination Testing (IDNR Handout)*
- *Industry Sector Notebooks (EPA Handout)*
- *Environmental Compliance Assistance Centers (EPA Handout)*
- *e-Manifest Fact Sheet (EPA Handout)*
- *RCRA Online A Quick Reference Guide (EPA Handout)*
- *Requirements for Used Oil Management Standards (EPA Handout)*
- *Emergency Response Program (EPA Handout)*
- *Commercial Motor Vehicle Transportation System Security & Safety (EPA Handout)*
- *Security Awareness (EPA Handout)*
- *Chemical Facility Anti-Terrorism Standards (Homeland Security Handout)*
- *Iowa Life/Changing Iowa Department of Economic Development – Iowa Environmental Guide for Business (IDNR Handout)*
- *How to Register for RCRAInfo Industry Application for Iowa Facilities (IDNR Handout)*

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

Service Trucks International designs and manufactures utility trucks for mining, utilities, road construction, agricultural, oil and gas industries, as well as local, state, and federal government. The also operate Tiger Cranes, a wholly owned division of Service Trucks International, and has been building telescoping service cranes in this same facility since 1990. Service Trucks International markets equipment in the United States, Canada, and Mexico, as well as in international markets. The facility is owned by a shareholder group of employees. Mr. Van Laren stated that this facility has been in operation for about 54 years at this location. The facility is about 57,000 square feet and operates 0600-1700 hours, Monday–Friday, with about 55 staff. Mr. Van Laren stated that the facility produces about 360 utility truck units per year. Mr. Van Laren stated that he was not aware of any previous RCRA inspections at the facility and there had been no spills or activation of their emergency action plan that he was aware of. Mr. Van Laren stated that they have two locations in Sioux Center, Iowa. This location (877 1st Ave NW) starts the utility box construction process and is primarily involved in cutting and

assembling metal parts. Their sister facility located about one mile to the North (1877 N Main Ave) is involved in the painting and final assembly of the utility boxes. Mr. Van Laren stated that the sister facility generates hazardous waste solvent and paint. He stated that the facility sold their Ag Division of the business last year (2023) and are still in the process of cleaning out the equipment and products used in that part of the business. After selling the Ag Division, the facility changed their business name from Sioux Automation Center to Service Trucks International. See Attachment #1 for the facility aerial map views. Photo 1 shows an outside view of the front entrance with the new name signage.

4.2 RCRA Status

Service Trucks International had not been previously inspected by the EPA for RCRA compliance. According to RCRAInfo, Service Trucks International had most recently notified as a Small Quantity Generator on August 19, 1994. I verified the facility address and the site contact information with Mr. Van Laren and updated the EPA RCRA Notification Acknowledgement Verification Report to indicate the primary contact's name and phone number and the new business name (see Attachment #5). At the time of this inspection, I determined Service Trucks International to be a non-generator of hazardous waste and a generator of used oil.

4.3 Facility Waste Streams and Management

Mr. Van Laren stated that the following waste streams are managed by Service Trucks International:

Spent Parts Washer Solvent - Service Trucks International does not generate spent parts washer solvent. Mr. Van Laren stated that their part washer in the former Ag Repair Area had not been used since the Ag repair business was discontinued mid-summer last year. Mr. Schuld (Maintenance Supervisor) stated that they did not use the parts washer much and only added Norsolv solvent (see Attachment #8 for the SDS) as needed occasionally to bring up the level. Mr. Schuld stated that when in use, no spent parts washer solvent had been generated. He estimated less than five gallons per year was added and they did not routinely empty and replace any solvent, and he could not recall ever replacing the solvent. Mr. Van Laren stated that they plan to sell and remove all the product oil and equipment, including the parts washer, in the Ag Repair Area in the next few weeks. During the visual inspection, I took Photos 2, 3, and 4 of the parts washers and an overview of the Ag Repair Area. Mr. Schuld stated that the parts washer was empty and out-of-service.

Used Oil - Service Trucks International generates about 300 gallons of used oil annually from maintenance operations. The used oil is stored onsite in a 200-gallon tank and a 55-gallon poly drum located in the Used Oil Storage Room they call the Cave. About once a year the used oil is transported by American Used Oil (Sioux Falls, South Dakota) for recycling. During the visual inspection, I observed a black steel 200-gallon aboveground used oil tank, about ¼ full, labeled with the words "Used Oil." The tank appeared to be free of any damage or leaks. I also observed a white poly 55-gallon drum, that appeared to be full, and free of any damage or leaks. The drum was labeled with the words "Used Oil" (see Photos 6 and 7).

Laser Metal Dust - Service Trucks International generates about one 55-gallon drum of laser metal dust per year from laser cutting operations. This waste had been determined to be non-hazardous based product and process knowledge. Mr. Van Laren stated that they use high quality grade 80-100 carbon steel (see Attachment #7 for an SDS). The laser metal dust is collected by an attached vacuum system and transferred to a 55-gallon drum and processed as scrap metal (see Photos 8 and 9). The scrap metal is picked up every two weeks or monthly, by Sioux City Compressed Steel (Sioux City, Iowa) for recycling.

Scrap Metal - Service Trucks International generates about 25 tons monthly of steel and aluminum scrap metal from their manufacturing and construction operations. This waste had been determined to be non-hazardous based product and process knowledge. Photo 5 shows a CN Lath milling scrap metal. Onsite, the scrap metal is sorted into several one and two cubic-yard containers and 20-cubic yard roll-off located in the Outside South Lot (see Photos 10 and 11). The scrap metal is picked up every two weeks or monthly, by Sioux City Compressed Steel (Sioux City, Iowa) for recycling.

General Trash - Service Trucks International generates general trash from manufacturing and business office operations. The facility estimates it generates about 1.5 tons of general trash per month. This general trash has been determined to be non-hazardous based product and process knowledge. The general trash is compacted into 30 cubic-yard roll-off containers (see Photo 12), picked up weekly by Brommer (Sioux Center, Iowa) (see Attachment #9 for an invoice), and transported to a local landfill.

4.4 Other Areas Reviewed

Outside Facility Perimeter - I conducted a limited inspection of the outside perimeter of the facility and observed no hazardous waste storage tanks or containers except as noted above. See the aerial and map views in Attachment #1.

5.0 SUMMARY OF FINDINGS

No preliminary findings or compliance issues observed at the time of the inspection. However, further EPA review may include findings.

MARK HOLCOMB
(Affiliate)



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HOLCOMB (Affiliate)
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Mark Holcomb
Civil Investigator, SEE

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Amber Whisnant
RCRA Section Chief, ECAD/Chemical Branch

Attachments:

- 1) Facility Aerial Map Views (4 pages)
- 2) Photo Log (9 photos and 9 pages)
- 3) Receipt for Documents (1 page)
- 4) Confidentiality Notice (1 page)
- 5) EPA RCRA Notification Acknowledgement/Verification Report (1 page)
- 6) NOPF (1 page)
- 7) SDS - Steel (1 page)
- 8) SDS - Norsolv (8 pages)
- 9) Invoice - General Trash (1 page)