

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

IOWA ARMY NATIONAL GUARD

7105 NW 70th Avenue
Johnston, Iowa 50131
515-252-4486

EPA ID Number: IAD981504285

On

April 03, 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 Iowa Army National Guard (IAANG) at 7105 NW 70th Avenue, Johnston, 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

IAANG:

Lena R. Douglas, Environmental Specialist Sr.
Shannon Garretson, Environmental Program Manager
Aaron Cox, Building 2314 Environmental Health and Safety
Keegan Warner, Lead Building 2277
SSG Kenneth Dales, Building 2287
Brian Goodale, Building 2287 Chief Warrant Officer
Christan Beck, Building 4410 Warehouse
John Perkins, Colonel (Exit Briefing Only)
Dawn Baumunk, Environmental Clerk

Toeroek Team:

Clifford Nelles, Inspector, 816-213-5192

INSPECTION PROCEDURES

Prior to the CEI at IAANG on April 3, 2024, I conducted a drive-by visual inspection. I did not observe any areas of concern during the drive-by. Upon my arrival, I approached the security checkpoint at the main entrance, identified myself and the purpose of my visit, and was directed to Building 2440. I entered Building 2440 and met Ms. Baumunk. I identified myself and asked to speak to Ms. Douglas, the site contact listed on the Notification Acknowledgment/Verification Report (Verification Report) (Attachment 1). Ms. Baumunk informed me that Ms. Douglas and Garretson were in Iowa City, Iowa, for training. Ms. Baumunk contacted Ms. Douglas to inform her of the inspection. Ms. Douglas stated that she and Ms. Garretson were leaving immediately and would arrive at the facility in approximately 2.5 hours.

I asked Ms. Baumunk for uniform hazardous waste manifests and the contingency plan. I started the records review in a conference room at approximately 8:00 a.m. Ms. Douglas and Garretson arrived at approximately 9:35 a.m. After brief introductions, I conducted an entry briefing with Ms. Douglas, Garretson, and Baumunk.

During the entry briefing, I presented my business card and EPA credentials to Ms. Douglas, Garretson, and Baumunk. 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, Ms. Douglas would be presented with a Confidentiality Notice (Notice) with which she could make or not make a claim of confidentiality for the facility. I also provided Ms. Douglas, Garretson, and Baumunk 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.

A copy of each of the following documents was left with Ms. Douglas 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 emailed to Ms. Douglas.

- 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 with Ms. Douglas (Attachment 1). Based on this review, I made no changes to the verification report.

I conducted a visual inspection of the facility. Ms. Douglas accompanied me during the visual inspection. Following the visual inspection, I completed my review of facility records including uniform 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 Ms. Douglas, Garretson, Baumunk, and Mr. Perkins. During the exit briefing, I provided a Receipt for Documents and Samples, which Ms. Douglas signed, acknowledging receipt (Attachment 2). I provided Ms. Douglas the Notice, which she signed indicating no confidential business information had been provided (Attachment 3). I also provided Ms. Douglas a Notice of Preliminary Findings (NOPF), which she signed to acknowledge receipt (Attachment 4).

A maps of the facility obtained during the CEI is included as Attachment 5, and a Google Earth aerial photograph of the facility is included as Attachment 6. The 24 photographs taken during the CEI are included in Attachment 7, of which 20 are described in this report.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

IAANG is a military readiness and training facility owned by the State of Iowa and operated by the Army National Guard as Camp Dodge. According to Ms. Douglas, the primary function of IAANG Camp Dodge is the Sustainment Training Center (STC). The STC is a national training center for military maintenance units. Camp Dodge has been in operation since 1907. The facility encompasses approximately 4,300 acres and currently has approximately 1,000 full-time personnel who work one shift (8:00 a.m. to 5:00 p.m.) facility-wide.

Ms. Douglas stated that the facility recently renumbered all buildings at the facility. The facility previously used a system of one letter followed by numbers. The site map in Attachment 5 shows the current four-digit building numbering system.

The STC uses a 103,000-square-foot maintenance facility (Building 2287) for general support training and a 48,000-square-foot facility (Building 2297) for direct support training. The STC also utilizes several smaller buildings (for example, Buildings 2314, 2317, 2277, 2326, 2345,

2287, and 4410) for training and/or waste accumulation. IAANG's primary North American Industrial Classification System (NAICS) code is 928110 (National Security).

According to Ms. Douglas, STC training and maintenance units are the largest waste generators at the facility. Wastes are generated during painting, vehicle maintenance, and facility and equipment maintenance operations. The facility makes hazardous waste determinations based on product and process knowledge.

IAANG has one main paint booth in Building 2277 that is used for painting large pieces of equipment. The facility also has a smaller paint booth in Building 2287 for painting smaller items, such as metal foot lockers, and for staining furniture type wood items. The facility primarily uses water-based paint; however, some solvent-based paint is used. IAANG considers waste paint related materials (WPRM) to be hazardous waste. Waste paint booth filters are considered to be nonhazardous waste.

Vehicle maintenance generates used oil, used oil filters, used antifreeze, waste fuel, waste jet fuel filters, and waste shop towels. Used oil and used oil filters generated during vehicle service and repair work is managed according to Title 40 *Code of Federal Regulations* (40 CFR) Part 279. The facility considers used antifreeze, waste fuel, waste jet fuel filters, and waste shop towels to be hazardous wastes. The facility utilizes jet fuel, instead of gasoline or diesel fuel, in 99% of the vehicles at the facility. No aviation maintenance is performed at the facility.

Facility and equipment maintenance generates spent parts washer solvent, spent aqueous parts washer wastewater, waste batteries, waste lamps, aerosol cans, spill debris, and general trash. The facility utilizes two types of parts washers (recyclable solvent-based and aqueous-based) to clean vehicle and equipment parts. IAANG considers spent parts washer solvent and spent aqueous parts washer wastewater to be nonhazardous wastes.

Waste batteries and waste lamps generated during facility and equipment maintenance are managed as universal wastes per 40 CFR Part 273. A variety of activities generate aerosol cans, which are also managed as universal wastes per 40 CFR Part 273. Spent lead-acid batteries generated during vehicle service and repair are managed according to requirements of 40 CFR Part 266 Subpart G.

Spill debris is generated from cleanup of fuel and oil spills, and is considered to be nonhazardous waste. General trash is considered nonhazardous waste is transported to Metro Park East Landfill in Mitchellville, Iowa, for landfill disposal.

IAANG receives wastes from 27 IAANG facilities across the State of Iowa that are very small quantity generators (VSQG) of hazardous waste (generating less than 100 kilograms [kg] or 220 pounds of hazardous waste per month). The waste primarily includes WPRM, aerosol cans, waste lamps and batteries (which are managed as universal wastes), and nonhazardous spill debris from cleanup of fuel and oil spills.

On March 16-17, 2020, an EPA contractor conducted a CEI for EPA at IAANG. Following the CEI, the inspector left preliminary finding for failure to submit a 2019 hazardous waste biennial report. The preliminary finding was not repeated during this CEI.

2. RCRA Status

The Verification Report (Attachment 1) indicates that IAANG is registered with EPA, under EPA ID IAD981504285, as a LQG of hazardous waste (generating more than 1,000 kg or 2,200 pounds of hazardous waste per month). A copy of the 2023 Comprehensive Biennial Report obtained from EPA's RCRAInfo system is in Attachment 8. IAANG reported a total of 28,143 pounds (12,765 kg) of hazardous waste in 2023. This quantity is greater than 1,000 kg of hazardous waste per month. A copy of IAANG's 2023 biennial notification, which was emailed to me by Ms. Douglas after the CEI, is in Attachment 9. This notification identifies 27 VSQG IAANG facilities that send hazardous waste to the facility for consolidation. Based on the quantity of hazardous waste reported on the 2023 biennial report and receipt of hazardous waste from VSQG facilities under control of the same entity, I considered IAANG to be a LQG of hazardous waste and inspected the facility as such. I also inspected the facility as a generator of used oil and a small quantity handler (SQH) of universal waste (accumulating less than 5,000 kg of universal waste at any time).

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. Ms. Douglas accompanied me during the visual inspection. Other personnel identified below provided information during the visual inspection. All inspection participants were provided a copy of U.S. Federal Codes 1001 and 1002, which they read.

WPRM is generated during the painting and cleaning activities in Buildings 2287 and 2277, and received from IAANG VSQGs. IAANG considers WPRM to be hazardous (D001, D035, F003, F005) based on product and process knowledge. The waste is collected in 55-gallon satellite accumulation containers (SAC) and full containers are transferred to the hazardous waste central accumulation area (HWCAA) in Building 4410. Copies of the SDSs for MIL-DTL-53030D Type II Two Component Waterborne Epoxy Primer, MIL-DTL-64159C Type II 2K Water Reducible Polyurethane CARC Green, and Kleen-Strip Acetone are included as Attachments 10 through 12. WPRM is transported to Philip Reclamation Services in Houston, Texas, for bulking/offsite transfer.

During the visual inspection, I spoke with Messrs. Warner, Goodale and Dales in their respective painting areas. All three indicated that they each generate approximately 55 gallons of WPRM annually.

During the CEI, I observed a 55-gallon SAC of WPRM in Building 2287 (Attachment 7, Photograph 15). The SAC was structurally sound, near the point of generation, under control of the operator, labeled with the words "hazardous waste" and an indication of the nature of the

hazard, closed, and held approximately 25 gallons of WPRM. I also observed, but did not photograph, a 55-gallon SAC of WPRM in Building 2277. The SAC was structurally sound, near the point of generation, under control of the operator, labeled with the words “hazardous waste” and an indication of the nature of the hazard, closed, and held approximately 15 gallons of WPRM. I did not observe any deficiencies related to WPRM.

Waste paint booth filters and felt filter mats are generated during the maintenance of paint and stain booths and the water blast closed loop painting system. IAANG considers waste paint booth filters and felt filter mats to be nonhazardous based on product and process knowledge. According to Mr. Dales, approximately nine intake filters are generated from the Building 2287 paint booth every three months, and 16 exhaust filters are generated monthly. According to Mr. Warner, approximately 20 intake filters are generated annually from the Building 2277 down draft paint booth, while 10 exhaust filters are generated every 90 days. He added that one filter roll is generated approximately every six months from the water blast closed loop painting system. All waste paint booth filters and felt filter mats are added to the general trash waste stream. General trash is transported to the Metro Park East Landfill in Mitchellville, Iowa, for landfill disposal. I did not observe any waste paint booth filters or felt filter mats in accumulation during the CEI.

Used antifreeze is generated during the repair and maintenance of facility vehicles and is received from IAANG VSQGs. IAANG considers used antifreeze to be hazardous (D008) based on product and process knowledge. The waste is transferred to 55-gallon SACs upon generation and full 55-gallon containers are transferred to the HWCAA in Building 4410. According to Ms. Douglas, the facility generated approximately 3,600 pounds of used antifreeze in 2023. Used antifreeze is transported to Philip Reclamation Services in Houston, Texas, for bulking/offsite transfer. In Building 2314 I was introduced to Mr. Aaron Cox.

During the CEI, I observed a 55-gallon SAC in the Building 2314 shop (Attachment 7, Photograph 1). The SAC was structurally sound, near the point of generation, under control of the operator, labeled with the words “hazardous waste” and an indication of the nature of the hazard, closed, and held approximately 20 gallons of antifreeze. I also observed 55-gallon SACs of used antifreeze in the Building 2345 shop and the Building 2287 shop. The SACs were structurally sound, near the point of generation, under control of the operator, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and closed.

I observed a 55-gallon SAC of used antifreeze SAC in Building 2317 (Attachment 7, Photographs 8 and 9). The SAC was structurally sound, near the point of generation, under control of the operator, closed, and held approximately 15 gallons of used antifreeze. However, the SAC was not labeled with the words “hazardous waste,” as required by 40 CFR 262.15(a)(5)(i) (**NOFF No. 1**), or labeled with an indication of the nature of the hazard, as required by 40 CFR 262.15(a)(5)(ii) (**NOFF No. 2**). I provided compliance assistance regarding management of SACs during the CEI.

In the Building 4410 HWCAA, I observed three hazardous waste accumulation containers (HWAC) of used antifreeze (Attachment 7, Photographs 21 and 22). The HWACs were

structurally sound, labeled with the words “hazardous waste” and an indication of the nature of the hazard, full, closed, and dated March 7, 2024.

I observed an additional two 55-gallon HWACs of used antifreeze in the Building 4410 HWCAA (Attachment 7, Photographs 19 and 20). The HWACs were structurally sound, labeled with the words “hazardous waste” and an indication of the nature of the hazard, full, and closed. However, the HWACs were not marked with accumulation start dates, as required by 40 CFR 262.17(a)(5)(i)(C) (**NOPF No. 5**). It was not clear whether the waste was generated at the facility or received from a VSQG. If received from a VSQG, the marking of accumulation start dates is required by 40 CFR 262.17(f)(3).

I asked Ms. Douglas how long the undated HWACs had been accumulating. She stated that she did not know. Ms. Douglas contacted Mr. Beck. I asked Mr. Beck how long the undated HWACs had been accumulating. He stated that the containers had been there approximately one week. I provided compliance assistance regarding management of HWACs during the CEI.

Aerosol cans are generated by maintenance painting and lubricating applications, and are received from IAANG VSQGs. IAANG manages aerosol cans as universal waste according to requirements of 40 CFR Part 273. The facility generates approximately 300 gallons of aerosol cans per year. Aerosol cans are accumulated in 55-gallon universal waste accumulation containers and are transported to Philip Reclamation Services in Houston, Texas, for recycling.

During the CEI, I observed a 55-gallon container of aerosol cans in Buildings 2326, 2345 and 2346 (Attachment 7, Photograph 10). The universal waste accumulation containers were labeled with the words “universal waste aerosol cans” and dated June 22, 2023.

I also observed 55-gallon containers of aerosol cans in the Building 2314 shop and Building 4410 (Attachment 7, Photographs 3 and 24). The universal waste accumulation containers were labeled with the words “universal waste aerosol cans.” However, the containers were not marked with accumulation start dates or otherwise tracked to demonstrate the accumulation time, as required by 40 CFR 273.15(c) (**NOPF No. 8**). I provided compliance assistance regarding handling and management of universal wastes during the CEI.

NOPF #8 was not initially left with the facility during the CEI, but was added on April 18, 2024. Ms. Douglas was informed by email of its addition on April 18, 2024.

Spent parts washer solvent is generated during servicing of the parts washers by Safety-Kleen approximately every three months. The facility generates approximately 480 gallons of spent parts washer solvent per year. The parts washers use Safety-Kleen Premium Solvent, which is a high flashpoint petroleum distillate. IAANG considers spent parts washer solvent to be nonhazardous based on product and process knowledge. A copy of the SDS for Safety-Kleen Premium Solvent was provided by Ms. Douglas after the CEI and is included as Attachment 13. The parts washers in Buildings 3447 and 1350 were not observed during the CEI.

Spent aqueous parts washer wastewater is generated during maintenance of four aqueous parts washers (Hotsy 7230A, Better Engineering G-2000 (2 units), CUDA H20-2518) that use water

with ArmaKleen detergent in Building 2287. The facility considers the wastewater nonhazardous based on product and process knowledge. According to Ms. Douglas the facility generated approximately 7,000 pounds of this wastewater in 2023. The wastewater from parts washers is not accumulated on-site; it is pumped directly to a tanker truck during parts washer servicing. The wastewater is transported by Hydro Klean to its Des Moines, Iowa, facility for pre-treatment prior to disposal into the sanitary sewer system.

I observed the aqueous parts washers during the CEI. The parts washers had a used oil collection system, which is emptied daily into a 280-gallon used oil AST. The used oil AST appeared to be in good condition and was labeled with the words “used oil.” I did not observe any deficiencies related to the aqueous parts washer wastewater during the CEI.

Used oil is generated during routine maintenance and repair of facility vehicles at various buildings, including Buildings 2314 and 2287. IAANG manages used oil according to requirements of 40 CFR Part 279. According to Ms. Douglas the facility generated approximately 8,500 gallons in 2023. Used oil is collected and transferred to 55-gallon used oil storage containers or 280-gallon ASTs. The waste is transported to Safety-Kleen in Des Moines, Iowa, for recycling.

During the CEI, I observed a 55-gallon used oil storage container in the Building 2314 shop (Attachment 7, Photograph 4). The container appeared to be in good condition with no apparent leaks or damage, was labeled with the words “used oil,” and held approximately 25 gallons of used oil. I also observed a 280-gallon used oil AST in the Building 2314 shop (Attachment 7, Photograph 5). The used oil AST was in good condition with no apparent leaks or damage, was labeled with the words “used oil,” and held approximately 100 gallons of used oil.

I also observed 280-gallon used oil ASTs Buildings 2345 and 2346. All ASTs were labeled with the words “used oil,” appeared to be in good condition with no apparent leaks or damage, and held between 60 and 100 gallons of used oil. I did not observe any deficiencies related to used oil during the CEI.

Used oil filters are generated during routine maintenance and repair of facility vehicles at various buildings, including Buildings 2297 and 2287. IAANG manages used oil filters according to requirements of 40 CFR Part 279. Used oil filters are crushed and placed in 30-gallon used oil filter storage containers. IAANG shipped twenty-five 30-gallon used oil filter storage containers in 2023. The waste is transported to Safety-Kleen in Des Moines, Iowa, for recycling. Used oil collected during the used oil filter crushing is transferred to a 280-gallon used oil AST.

During the CEI, I observed two used oil filter crushers in Buildings 2297 and 2287. A 30-gallon used oil filter storage container was below each crusher. The containers were in good condition, labeled with the words “used oil filters,” and held approximately 30 gallons of crushed filters collectively. I did not observe any deficiencies related to used oil filters during the CEI.

Waste shop towels are generated during maintenance and repair of facility vehicles. The facility considers waste shop towels to be hazardous (D001) by product and process knowledge.

According to Ms. Douglas, the facility generated approximately 4,000 pounds of waste shop towels in 2023. Waste shop towels are accumulated in SACs, and full SACs are transferred to the HWCAA. The waste is transported by Terrabella Environmental Services to Philip Reclamation Services in Houston, Texas, for bulking/offsite transfer.

During the CEI in Building 2314 I observed a 55-gallon SAC of waste shop towels in Building 2314 (Attachment 7, Photograph 7). The SAC was structurally sound, under control of the operator, near the point of generation, labeled with the words “hazardous waste” and an indication of the nature of the hazard, closed, and held approximately 15 gallons of waste shop towels.

I observed a 20-gallon SAC of waste shop towels in Building 2326 (Attachment 7, Photograph 11). The SAC was structurally sound, under control of the operator, near the point of generation, labeled with the words “hazardous waste,” closed, and held approximately 10 gallons of waste shop towels. However, the SAC was not labeled with an indication of the nature of the hazard, as required by 40 CFR 262.15(a)(5)(ii) (**NOPF No. 2**).

I observed a 55-gallon SAC of waste shop towels in Building 2345 during the CEI. The SAC was structurally sound, near the point of generation, under the control of the operator, and held approximately 10 gallons of waste shop towels. However, the SAC was not labeled with the words “hazardous waste,” as required by 40 CFR 262.15(a)(5)(i) (**NOPF No. 1**) or labeled with an indication of the nature of the hazard, as required by 40 CFR 262.15(a)(5)(ii) (**NOPF No. 2**). The container was also not closed, as required by 40 CFR 262.15(a)(4) (**NOPF No. 3**).

I neglected to photograph the SAC of waste shop towels at the time of the CEI. I pointed this out to Ms. Douglas and she concurred that the SAC was not labeled or closed.

Waste fuel is generated during maintenance of facility vehicles. Waste fuel is generated in various buildings including 2314, 2345 and 2287. The facility considers waste fuel to be hazardous (D001) by product and process knowledge. According to Ms. Douglas, approximately 3,000 gallons of waste fuel was generated in 2023. Waste fuel is transported by Terrabella Environmental Services to Philip Reclamation Services in Houston, Texas, for bulking/offsite transfer.

During the CEI, I observed a 55-gallon SAC of waste fuel in Building 2314 (Attachment 7, Photograph 6). The SAC was structurally sound, under control of the operator, near the point of generation, labeled with the words “hazardous waste” and an indication of the nature of the hazard, closed, and held approximately 10 gallons of waste fuel. I also observed 55-gallon SACs of waste fuel in Buildings 2345 and 2287. Both SACs were structurally sound, under control of the operator, near the point of generation, labeled with the words “hazardous waste” and an indication of the nature of the hazard, closed, and held between 10 and 25 gallons of waste fuel.

In the Building 4410 HWCAA, I observed three 55-gallon HWACs of waste fuel (Attachment 7, Photograph 21 and 22). The HWACs were structurally sound, labeled with the words “hazardous waste” and an indication of the nature of the hazard, full, closed, and dated March 7, 2024.

I observed a fourth 55-gallon HWAC of waste fuel in the Building 4410 HWCAA (Attachment 7, Photograph 18). The HWAC was structurally sound, labeled with the words “hazardous waste” and an indication of the nature of the hazard, full, and closed. However, the HWAC was not marked with an accumulation start date, as required by 40 CFR 262.17(a)(5)(i)(C) (**NOPF No. 5**).

According to Mr. Beck, the undated HWAC had been accumulating for approximately one week. I provided compliance assistance regarding management of HWACs during the CEI.

Waste batteries are generated during equipment maintenance throughout the facility. Waste batteries are managed as universal waste according to requirements of 40 CFR Part 273. According to Ms. Douglas, the facility shipped approximately 270 pounds of waste batteries in 2023. The waste is transported by Terrabella Environmental Services to Philip Reclamation Services in Houston, Texas, for recycling. I did not observe any universal waste accumulation containers with waste batteries in the various shops or in the Building 4410 HWCAA during the CEI.

Waste lamps are generated during facility lighting maintenance and consist of used fluorescent, compact fluorescent, and high intensity discharge (HID) lamps. Waste lamps are managed as universal waste according to requirements of 40 CFR 273. According to Ms. Douglas, the facility shipped approximately 1,200 pounds of waste lamps in 2023. The facility also receives waste lamps from the 27 IAANG VSQGs. The waste is collected by A-Tec Recycling in Des Moines, Iowa, for recycling.

During the CEI, I observed a universal waste accumulation container for waste lamps in Building 4410 (north side receiving dock) (Attachment 7, Photographs 16 and 17). The container was structurally sound, closed, labeled with the words “universal waste lamps,” dated February 26, 2024, and held approximately 200 waste lamps. I noted no deficiencies regarding management of waste lamps during the CEI.

Waste jet fuel filters are generated during maintenance of jet fuel tankers. The filters are 4-foot cotton fabric filters. They are containerized in 55-gallon HWAC and transported to the HWCAA in Building 4410. The facility considers the waste to be hazardous (D001) based on product and process knowledge. According to Ms. Douglas the facility generated approximately 300 pounds of waste jet fuel filters in 2023. The waste is transported by Terrabella Environmental Services to Philip Reclamation Services in Houston, Texas, for bulking/offsite transfer. I did not observe any waste jet fuel filters during the CEI.

Spill debris is generated from cleanup of spills of fuel, oil, and antifreeze throughout the facility shops. The waste is collected in 55-gallon containers. Full containers are transferred to a 20-cubic-yard roll off container outside Building 4410. The facility considers spill debris to be nonhazardous based on product and process knowledge. Spill debris is transported by Metro Waste Authority to the Metro Park East Landfill in Mitchellville, Iowa, for landfill disposal under a Special Waste Authorization (SWA). I did not review the SWA during the CEI. I observed 55-gallon containers of spill debris during the CEI (Attachment 7, Photograph 2) and noted no deficiencies.

General trash consists of nonhazardous wastes, packaging wastes and general office-type refuse. The general trash is collected in dumpsters and transported to the Metro Park East Landfill in Mitchellville, Iowa, for landfill disposal. 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(a)(6), a LQG 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

IAANG maintains one HWCAA on the south side of Building 4410. Ms. Douglas stated that the HWCAA is the accumulation point for wastes generated at the facility as well as wastes received from the 27 IAANG VSQGs. The HWCAA was maintained with adequate aisle space. I asked Ms. Douglas how someone would summon emergency assistance, and she stated that each person who handled hazardous waste carries a two-way radio.

I asked Ms. Douglas if the HWCAA is inspected. She stated that it is inspected on a weekly basis and that an inspection log is maintained to document each inspection. I reviewed the inspection log for the last three years and noted that the last entry was for March 20, 2024 (Attachment 14). No entry for the week of March 25, 2024, was present on the next sheet of the inspection log. I determined that the facility failed to adequately inspect a HWCAA on a weekly basis, as required by 40 CFR 262.17(a)(1)(v) (**NOPF No. 4**).

6. Manifests

IAANG generated uniform hazardous waste manifests for 29 hazardous waste shipments from April 1, 2021, to April 1, 2024. During the CEI, I reviewed all of the manifests and LDR notifications for the 29 shipments. A copy of the manifest for the last shipment, dated March 6, 2024, is included as Attachment 15. I noted no deficiencies during my review of manifests and LDR notifications.

7. Preparedness and Prevention

LQG facilities are required by 40 CFR 262.17(a)(6) to meet the emergency preparedness, prevention, and procedures requirements outlined in 40 CFR 262 Subpart M including preparation of a RCRA contingency plan and documented arrangements with response agencies. According to Ms. Douglas, IAANG is the subject of a regular inspection by the Johnston Fire Department hazardous materials team. He explained the fire department is shown the layout of the facility, the location of the hazardous waste HWCAA, and other facility features during inspections.

I reviewed a copy of the facility's contingency plan which was last updated on March 19, 2020. It listed Mr. Curtis Madsen as the primary emergency coordinator. I asked Ms. Douglas where Mr. Madsen was. She stated that Mr. Madsen retired in 2021. The facility failed to update the contingency plan when the list of emergency coordinators changed, as required by 40 CFR 262.17(a)(6) Referencing 262.263(d) (**NOPF No. 6**). I asked Ms. Douglas who the current emergency coordinator is. She stated that she is the emergency coordinator and Ms. Garretson is the first alternate.

During my review of the contingency plan, I noted the 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 a quick reference guide, as required by 40 CFR 262.17(a)(6) referencing 262.262(b). I noted no deficiencies with content of the quick reference guide.

8. 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. I reviewed the training records of Messrs. Cox, Dales and Ms. Douglas. I noted that Messrs. Cox and Dales had completed annual training for the last three years. Copies of their most recent training certificates are included in Attachment 16. I noted no training certificate for Ms. Douglas in 2023. Ms. Douglas stated that she did not take the training in 2023. The facility failed to provide annual training for an employee who manages hazardous waste, as required by 40 CFR 262.17(a)(7)(iii) (**NOPF No. 7**). Copies of Ms. Douglas' training certificates for 2022 are included in Attachment 17. A copy of the job description for Training Instructor Sustainment Training Center (Aaron Cox), provided by Ms. Douglas via email on April 5, 2024, is in Attachment 18.

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. IAANG 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. IAANG 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 HWACs. During the CEI, I determined that IAANG meets the Subpart CC requirements for containers by using Container Level 1 controls (HWACs 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:

- NOPF No. 1 - Failure to label two SACs with the words “hazardous waste,” as required by 40 CFR 262.15(a)(5)(i)
- NOPF No. 2 - Failure to label three SACs with an indication of the nature of the hazard, as required by 40 CFR 262.15(a)(5)(ii)
- NOPF No. 3 - Failure to keep a SAC closed, as required by 40 CFR 262.15(a)(4)
- NOPF No. 4 - Failure to inspect a HWCAA on a weekly basis, as required by 40 CFR 262.17(a)(1)(v)
- NOPF No. 5 - Failure to mark three HWACs with a start date as required by 40 CFR 262.17(a)(5)(i)(C)
- NOPF No. 6 - Failure to update contingency plan when emergency coordinators change, as required by 40 CFR 262.17(a)(6) Referencing 262.263(d)
- NOPF No. 7 - Failure to conduct annual hazardous waste training, as required by 40 CFR 262.17(a)(7)(iii)
- NOPF No. 8 - Failure to mark an accumulation start date or otherwise track accumulation time for a universal waste aerosol cans container, as required by 40 CFR 273.15(c)

NOPF #8 was not left with the facility but was added on April 18, 2024. Ms. Douglas was notified by email on April 18, 2024.

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
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Clifford A. Nelles, Inspector
CLAENE Group

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

Attachments:

1. Notification/Acknowledgement Verification Report (3 pages)
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 (1 page)
7. Photographic Documentation (Photolog and 24 Photographs) (15 pages)
8. 2023 Comprehensive Biennial Report (15 pages)
9. Copy of 2023 Biennial Notification (7 pages)
10. Copy of SDS for MIL-DTL-53030D Type II Two Component Waterborne Epoxy Primer (17 pages)
11. Copy of SDS for MIL-DTL-64159C Type II 2K Water Reducible Polyurethane CARC Green (13 pages)
12. Copy of SDS for Kleen-Strip Acetone (7 pages)
13. Copy of SDS for Safety-Kleen Premium Solvent (9 pages)
14. Copy of Inspection log for 2024 (1 page)
15. Copy of Manifest for a shipment on March 6, 2024 (1 page)
16. Copies of 2023 Training Records for Mr. Cox and SSG Dales (2 pages)
17. Copies of 2022 Training Records for Ms. Douglas (2 pages)
18. Copy of Job Description for Mr. Cox (1 page)