

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

Stryten Manchester LLC
913 S 10th St.
Manchester, IA 52057
(563) 927 - 4501

EPA ID Number: IAD069619765

On

July 21, 2022

By

Eastern Research Group, Inc.

For

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/Chemical Branch/RCRA Section (ECAD/CB/RCRA) of the U.S. Environmental Protection Agency (EPA) Region 7, Eastern Research Group, Inc. (ERG) conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Stryten Manchester LLC (SM) in Manchester, Iowa on July 21, 2022. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. Throughout the CEI, data and information were collected to determine compliance with the applicable regulatory and statutory requirements. The inspection report and attachments present the results of the CEI.

2.0 PARTICIPANTS

Stryten Manchester LLC:

Mitch Hermiston, Plant Manager

Matt Witham, Environmental & Facility Manager

Bruce Helle, Health & Safety Manager

Todd Treybal, Senior Director Operations (participated via telephone only)

Victoria Holmber, Senior Manager Environmental Compliance (participated via telephone only)

Lacey Chitwood, Chief Counsel Environmental Health & Safety (participated via telephone only)

Rodger Meyer, Vice President of Operations (participated via telephone only)

EPA Representative, ERG:

Janosh Wolters, Energy Engineer

3.0 INSPECTION PRECEDURES

After arriving unannounced at SM at approximately 09:30, I performed a drive-by visual inspection of the facility and took a photograph before beginning the inspection and did not note any areas of concern. The facility's main entrance has a security/front desk check-in prior to entering. I introduced myself and signed into the visitor's log. The security/front desk attendance team contacted Mr. Matt Witham, Environmental & Facility Manager who greeted me at approximately 09:35 at the main entrance. I introduced myself and presented my inspector credentials to Mr. Witham and explained that my reason for being on site is to conduct a RCRA CEI. Mr. Witham led me to a conference room to begin the opening conference where I immediately met with Mr. Mitch Hermiston, Plant Manager. Mr. Hermiston stated the facility would prefer a few more individuals join via telephone and gathered everyone onto a conference call. I initiated the opening conference with Mr. Witham and Mr. Hermiston as SM's representatives in person. Mr. Treybal, Ms. Holmber, Mr. Meyer, and Ms. Chitwood all joined via telephone. I presented Mr. Witham and Mr. Hermiston with my business card, as well as the business card of the EPA Task Order Contracting Officer Representative, Mr. Trevor Urban. I then presented a copy of RCRA Section 3007(a), which contains EPA's inspection authority. I explained my need to collect accurate information and presented them with a copy of Title 18 U.S. Code, Sections 1001 and 1002. I then presented Mr. Witham and Mr. Hermiston with a copy of the *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections* and reviewed SM's confidentiality rights. I informed Mr. Witham and Mr. Hermiston that I would provide a *Confidentiality Notice* at the end of this inspection.

The inspection consisted of a discussion of facility operations, waste generation and waste management, a review of waste management records, and a visual inspection of the waste generation and management areas. Mr. Witham provided a facility layout (see Attachment 1) and explained facility operations and locations of hazardous waste generation and management. The facility layout included past hazardous waste accumulation locations. Mr. Witham was unable to provide me with a more basic facility layout prior to conducting the visual inspection. Therefore, I documented all locations visited in my notebook during the visual inspection. I also included an aerial photograph of the facility but was unable to mark where each satellite accumulation area (SAA) was located. However, I wrote down the exact location as shown in the table in Section 4.5 of this report.

During the visual inspection of the facility, Mr. Witham guided me throughout the facility in order to conduct thorough evaluations of the facility's SAAs and central accumulation area

(CAA). At the time of the inspection, the facility was operating 54 SAAs and one CAA. The facility also handles universal waste lamps and batteries in one area on site as shown on the facility layout. The universal waste storage area was visually inspected. SM uses two parts washers on site that use a nonhazardous parts washer solution. I conducted an in-depth visual inspection of the SAAs, the CAA, the universal waste storage area, used oil storage area, and all manufacturing areas.

Twelve photographs were collected as inspection documentation and are shown in Attachments 2 and 3. Information collected during the inspection is documented on the *EPA Inspection Checklist* (see Attachment 4). I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.01D), unless noted differently. At the conclusion of the inspection, I provided Mr. Witham with a *Confidentiality Notice, Receipt for Documents and Samples*, and *Notice of Preliminary Findings* which he signed as acknowledgement of receipt (see Attachments 5, 6, and 7 respectively). No confidentiality claims were made by SM. The following inspection documents and compliance assistance handouts were left with SM:

RCRA Section 3007(a)
Title 18 U.S. Code, Sections 1001 and 1002
Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections
Confidentiality Notice (Facility copy)
Receipt of Documents and Samples (Facility copy)
NOPF (Facility Copy)
Instructions for Responding to a NOPF
Security Awareness
Commercial Motor Vehicle Transportation
Security Planning
EPA E-Manifest Fact Sheet U.S.
EPA Small Business Resources
U.S. EPA Publication, Managing Your Hazardous Waste
U.S. EPA Publication, Managing Used Oil-Advice for Small Businesses
PowerPoint Presentation, 2013 Solvent Wipes Final Rule
Pollution Engineering Article, 10 Common Questions for Waste Generators
Iowa Department of Natural Resources (IDNR) Waste Exchange Folder and P2 Brochures
IDNR Management of Fluorescent Lamps for Businesses Information Sheets
IDNR Aerosol Can Disposal for Businesses Information Sheet
University of Northern Iowa Waste Reduction Center Information Card
Solvent-Contaminated Wipes Final Rule Summary Chart

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

SM began operating in 1974 and currently employs approximately 260 people. The facility operates on a five-day, three shift schedule. However, maintenance teams operate 7 days per week to ensure the facility is able to be operating during the week for production. The facility

has a building footprint of approximately 295,000 square feet. SM operations consist of manufacturing lead acid batteries for commercial use. The primary raw materials used are lead and sulfuric acid. The major manufacturing or processing operations that generate waste streams include assembling and manufacturing lead acid batteries. The following waste streams are produced: lead contaminated debris, aerosol can residuals, spent flux, reclaimable lead filter cake, reclaimable lead scrap metal, dross, broken batteries, process water, parts washer solution, used oil, used oil filters, universal wastes, scrap metal, and general trash.

4.2 RCRA Status

According to the *Hazardous Waste Site Info Verification Report for Inspector* (see Attachment 8), SM notified as a federal Large Quantity Generator (LQG) (greater than 1000 kilograms(kg)/month of D001, D002, D006, D008, D029, D039, and D041 hazardous wastes. I asked Mr. Witham to review the *Hazardous Waste Site Info Verification Report for Inspector*, which I provided prior to records review and visual inspection of the waste generation areas. Mr. Witham stated the facility name should be updated. Mr. Witham explained that SM acquired Exide Technologies on August 28, 2020. Besides updating the facility name, Mr. Witham stated the remaining information on the form was accurate to the best of his knowledge. After reviewing the records and walking through the facility, I determined that the facility is operating as a federal LQG of D001 and D008 hazardous wastes, a generator of used oil, and a small quantity handler (SQH) of universal waste. SM generates more than 1,000 kilograms of hazardous waste monthly based on a review of facility records, a visual inspection of process and waste management areas, and interviewing personnel.

SM was previously inspected by an EPA contractor on May 24-25, 2017. The facility was operating as Exide Technologies, the company that SM acquired in 2020. The inspection led to a NOPF. The findings included: failure to make a hazardous waste determination, failure to label three universal waste lamp containers, failure to close hazardous waste SAA containers, failure to describe emergency equipment capabilities in the RCRA Contingency Plan, failure to include a description of actions to be taken in the event of an explosion in the RCRA Contingency Plan, failure to designate one emergency coordinator as primary, and list the others in order in which they assume responsibility, and failure to label universal waste mercury containing equipment container. I did not observe any repeat findings at the time of the inspection.

4.3 Facility Waste Streams and Management

A Waste Stream and Waste Handling Table for SM is presented below. The table describes waste streams generated, generation process/rates, hazardous waste determinations, and on-site/off-site management.

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#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
1	Lead Contaminated Debris (Waste Profile included in Attachment 9)	Clean up of floor sweeping, PPE, small, contaminated metal parts	D008 (based on process knowledge and knowledge of the product)	100,000 pounds per year	13-gallon containers and 125-gallon containers in SAAs before transferred to CAA	Quantrix Liquid Transportation in Chicago, IL (ILR000149146) to Heritage Environmental Services Indy Plant in Indianapolis, IN (IND093219012) for stabilization prior to land disposal at another site
2	Aerosol Can Residuals	Puncturing RCRA empty aerosol cans (punctured cans are added to scrap metal containers for recycling)	D001 (based on process knowledge and knowledge of the product)	One 55-gallon container shipped off per year	55-gallon container in SAA 43	Quantrix Liquid Transportation in Chicago, IL (ILR000149146) to Heritage Environmental Services Indy Plant in Indianapolis, IN (IND093219012) for fuel blending
3	Spent Flux (SDS included in Attachment 10)	Excess flux added onto lead during manufacturing process	Nonhazardous (based on process knowledge and knowledge of the product)	700 pounds per year	55-gallon containers in SAAs before transferred to CAA	Quantrix Liquid Transportation in Chicago, IL (ILR000149146) to Heritage Environmental Services Indy Plant in Indianapolis, IN (IND093219012) for disposal

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
5	Reclaimable Lead Filter Cake	Filter cake from wastewater treatment	Excluded per 40 CFR 261.4(a)(13) (based on management and process knowledge) recycled as scrap metal	124,000 tons per year	55-gallon containers	Simons Trucking to Forest City SMT in Forest City, MO to be added to smelter to extract metal contents
6	Reclaimable Lead – Scrap Metal, Dross, Bag House Dust, Broken Batteries	Excess materials from manufacturing batteries and dust collection	Excluded per 40 CFR 261.4(a)(13) (based on management and process knowledge) recycled as scrap metal	2,000 tons per year	55-gallon containers	Simons Trucking to Forest City SMT in Forest City, MO to be added to smelter to extract metal contents
7	Process Water	Washing batteries after leaving the charging process	Nonhazardous (based on process knowledge and knowledge of the product)	25,000 gallons per day	Pumped to on-site WW/TP for lead removal and pH adjustment	Discharged after treatment to Maquoketa River under NPDES Permit #2839100 (Permit included in Attachment 11)
8	Parts Washer Solution (SDS included in Attachment 12)	Cleaning small hand tools in maintenance	Nonhazardous (based on process knowledge and knowledge of the product)	30-gallons serviced every three months	In parts washer	Safety Kleen (IAD098027592) in Davenport, IA for recycling

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
9	Used Oil	Facility maintenance of equipment	Exempted (managed as used oil per 40 CFR 279)	400 pounds per year	55-gallon containers	Tradebe (INR000123497) to Tri-State Motor Transit Company (95039008) to Tradebe Treatment and Recycling LLC in East Chicago, IL (IND000646953) for recycling (Manifest included in Attachment 13)
10	Used Oil Filters	Punctured and hot drained then added to scrap metal	Exempted (managed as used oil per 40 CFR 279)	Estimated that one 55-gallon container would be filled per year if not added to scrap metal container	30-yard container	Alter Metal Recycling in Dubuque, IA for recycling
11	Scrap Metal	Facility operations	Excluded per 40 CFR 261.4(1)(13) (based on management and process knowledge) recycled as scrap metal	30-yard container picked up once every two to three weeks as needed	30-yard container	Alter Metal Recycling in Dubuque, IA for recycling

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
12	Universal Waste Lamps	Facility maintenance	Exempted (managed as universal waste per 40 CFR 273)	2,000 pounds per year	4-foot containers and 8-foot containers	Tradebe (INR000123497) to Tri-State Motor Transit Company (95039008) to Tradebe Treatment and Recycling LLC in East Chicago, IL (IND000646953) for recycling (Manifest included in Attachment 13)
13	Universal Waste Batteries	Facility maintenance	Exempted (managed as universal waste per 40 CFR 273)	200 pounds per year	5-gallon container	Tradebe (INR000123497) to Tri-State Motor Transit Company (95039008) to Tradebe Treatment and Recycling LLC in East Chicago, IL (IND000646953) for recycling (Manifest included in Attachment 13)

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
14	Antifreeze	Maintenance operations for draining grid casting cooling tanks	Nonhazardous (based on process knowledge and knowledge of the product)	1,200 pounds per year	55-gallon containers	Tradebe (INR000123497) to Tri-State Motor Transit Company (95039008) to Tradebe Treatment and Recycling LLC in East Chicago, IL (IND000646953) for recycling (Manifest included in Attachment 13)
15	General Trash	Facility operations	Nonhazardous (based on process knowledge and knowledge of the product)	One 40-yard container picked up weekly	40-yard container	Republic Services in Dubuque, IA to Dubuque Metropolitan Area Solid Waste Agency in Dubuque, IA for landfill

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4.4 Less-Than-90-Day Hazardous Waste Accumulation Area

SM has one Less-Than-90-Day CAA on site, which is located next to Line 11. The CAA is a 30-yard compactor container that accumulates the facility's lead contaminated debris waste (see Attachment 3, Photo 8). This is the primary hazardous waste generated by the facility. The only other hazardous waste generated on site is aerosol can residuals waste which is generated from puncturing RCRA empty aerosol cans. Mr. Witham stated the facility uses aerosol cans until RCRA empty and punctures them out of an abundance of caution. I visually inspected the CAA and observed the 30-yard container which operates as a compactor actively being filled with lead contaminated debris. Mr. Witham stated the lead contaminated debris is primarily PPE that is worn by operators and visitors of the facility. The facility managed the 30-yard compactor as a hazardous waste container. The container is only used to accumulate solid lead contaminated debris and is closed when not in use. The container was in good condition, labeled with the indication of the nature of the hazard, labeled with an accumulation start date, and labeled with the words "Hazardous Waste". The oldest accumulation start date observed was "7/14/2022" on a 55-gallon container of solid lead contaminated debris. July 14, 2022 is within 90 days from the time of the inspection.

The facility was only managing solid waste in this area and therefore, if waste were to fall out of the container, operators would place the solid waste back into the container. In addition, the facility did not appear to generate any incompatible wastes. I observed spill control equipment, and related safety equipment within close proximity of the CAA. Operators handling hazardous waste are trained to use their two-way radio system in case of emergencies. In addition, a phone is located near the CAA in case of emergencies. I asked Mr. Witham if the facility inspected the CAA. Mr. Witham stated the facility inspected the CAA at least weekly and documents all CAA inspections. However, during records review, the CAA inspections were only documented monthly. Mr. Witham then stated the facility conducts weekly inspections but only documents the inspections monthly. An example of the CAA log is provided in Attachment 14. The log included the facility's SAAs, some of which are no longer in use. In addition, it stated "Container Storage Locations" which appeared to be documented as facility CAAs. I asked Mr. Witham if the facility manages the containers in the locations specified on the log as CAAs or SAAs. Mr. Witham stated the facility currently only operates one CAA, which is the 30-yard compactor observed next to Line 11. During the visual inspection, Mr. Witham stated the CAA is inspected weekly and inspections are documented on a log. However, during records review, I only observed monthly inspection logs. Therefore, the following finding was left with the facility:

NOPF 1 – Failure to inspect a CAA at least weekly. [40 CFR 262.17(a)(1)(v)].

I asked Mr. Witham if the facility removed any SAAs or CAAs recently because the log does not appear to be up-to-date based on our visual inspection. Mr. Witham stated that prior to some point in 2018, the facility managed SAA containers observed in SAAs 47 through 54 as CAA containers. I asked Mr. Witham why the change occurred. Mr. Witham stated the facility brought in a third-party firm, which he could not name, and SM was consulted to change the containers to SAAs because they were emptied daily. I explained to Mr. Witham that the operation of emptying a container daily does not constitute that container as a SAA container or CAA

container. I asked Mr. Witham if the facility followed the requirements per 40 CFR 262.17(a)(8)(i)(a) and placed a notice in the operating record within 30 days after closure identifying the location of the unit (CAA). Mr. Witham was unable to provide a document or notice placed in the operating record. Therefore, the following finding was left with the facility:

NOPF 2 – Failure to place a notice in the operating records within 30 days after closure identifying the location of the unit within the facility. [40 CFR 262.17(a)(8)(i)(a)].

I did not note any additional issues or findings at the CAA during the inspection.

4.5 Satellite Accumulation Areas

I observed 54 satellite areas during the visual inspection. The table on the next three pages shows the SAA name or location, waste type, volume of waste observed, and container type. The table below represents how I observed SAA locations during the visual inspection. The table below does not coincide with the facility's checklist provided in Attachment 14.

SAA #	SAA Name or Location	Waste Type	Volume of Waste	Container Type
1	Office Area	Lead Contaminated Debris	10 gallons	13-gallon container
2	Paste Line	Lead Contaminated Debris	10 gallons	13-gallon container
3	Quality Lab	Lead Contaminated Debris	2.5 gallons	5-gallon container
4	Quality Lab	Lead Contaminated Debris	Less than 5 gallons	10-gallon container
5	Unloading Pasting Area	Lead Contaminated Debris	Less than 5 gallons	13-gallon container
6	Compressor Room	Lead Contaminated Debris	Less than 5 gallons	13-gallon container
7	Compressor Room	Lead Contaminated Debris	Less than 5 gallons	13-gallon container
8	Assembly Line 9	Lead Contaminated Debris	Less than 5 gallons	13-gallon container
9	Assembly Bathroom	Lead Contaminated Debris	Less than 5 gallons	13-gallon container
10	Line 8	Lead Contaminated Debris	Less than 5 gallons	13-gallon container
11	Line 7	Lead Contaminated Debris	Less than 5 gallons	13-gallon container
12	Line 6	Lead Contaminated Debris	Less than 5 gallons	13-gallon container
13	Line 6	Lead Contaminated Debris	Less than 5 gallons	13-gallon container
14	Line 5	Lead Contaminated Debris	Less than 5 gallons	13-gallon container

15	Line 5	Lead Contaminated Debris	Less than 5 gallons	13-gallon container
16	Line 4	Lead Contaminated Debris	Less than 5 gallons	13-gallon container
17	Wet Room 1	Lead Contaminated Debris	Less than 5 gallons	13-gallon container
18	Return Customer Performance Area	Lead Contaminated Debris	Less than 5 gallons	13-gallon container
19	Finishing/Shipping	Lead Contaminated Debris	Less than 5 gallons	13-gallon container
20	Finishing/Shipping	Lead Contaminated Debris	Less than 5 gallons	13-gallon container
21	Finishing/Shipping	Lead Contaminated Debris	Less than 5 gallons	13-gallon container
22	Finishing/Shipping	Lead Contaminated Debris	Less than 5 gallons	13-gallon container
23	Loading Dock	Lead Contaminated Debris	Less than 5 gallons	13-gallon container
24	Wet Room 2	Lead Contaminated Debris	10 gallons	20-gallon container
25	Wet Room 2 Rectifying Room	Lead Contaminated Debris	Less than 5 gallons	13-gallon container
26	Line 12	Lead Contaminated Debris	Less than 5 gallons	15-gallon container
27	Line 12	Lead Contaminated Debris	Less than 5 gallons	15-gallon container
28	Line 11	Lead Contaminated Debris	Less than 5 gallons	15-gallon container
29	Line 13	Lead Contaminated Debris	Less than 5 gallons	15-gallon container
30	Line 11	Lead Contaminated Debris	Less than 5 gallons	13-gallon container
31	Line 10	Lead Contaminated Debris	Less than 5 gallons	13-gallon container
32	Line 10	Lead Contaminated Debris	Less than 5 gallons	13-gallon container
33	Production Tool Room	Lead Contaminated Debris	Less than 5 gallons	10-gallon container
34	Rebuild Department	Lead Contaminated Debris	2.5 gallons	5-gallon container
35	Maintenance Department	Lead Contaminated Debris	Less than 5 gallons	10-gallon container
36	Maintenance Manager Office	Lead Contaminated Debris	Less than 5 gallons	13-gallon container
37	Line 8	Lead Contaminated Debris	Less than 5 gallons	13-gallon container

38	Grid Casting	Lead Contaminated Debris	Less than 5 gallons	10-gallon container
39	Plate Pasting	Lead Contaminated Debris	Less than 5 gallons	10-gallon container
40	Employee Entrance	Lead Contaminated Debris	Less than 5 gallons	10-gallon container
41	WWTP	Lead Contaminated Debris	Less than 5 gallons	15-gallon container
42	WWTP	Lead Contaminated Debris	Less than 5 gallons	10-gallon container
43	Hazardous Materials Building	Lead Contaminated Debris	Less than 5 gallons	55-gallon container
44	Hazardous Materials Building	Lead Contaminated Debris	Less than 5 gallons	13-gallon container
45	Men Locker Room	Lead Contaminated Debris	Less than 5 gallons	13-gallon container
46	Men Locker Room	Lead Contaminated Debris	Less than 5 gallons	13-gallon container
47	Front Wash/Paste Area	Lead Contaminated Debris	Less than 55-gallons	125-gallon container
48	Pasting Area	Lead Contaminated Debris	Less than 55-gallons	125-gallon container
49	Assembly Scrap #2 Area	Lead Contaminated Debris	Less than 55-gallons	125-gallon container
50	Finishing/Shipping	Lead Contaminated Debris	Less than 55-gallons	125-gallon container
51	Wet Room 2	Lead Contaminated Debris	Less than 55-gallons	125-gallon container
52	Maintenance Department	Lead Contaminated Debris	Less than 55-gallons	125-gallon container
53	Grid Casting	Lead Contaminated Debris	Less than 55-gallons	125-gallon container
54	Oxide Area	Lead Contaminated Debris	Less than 55-gallons	125-gallon container

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During the visual inspection, I observed the 54 SAAs. An example photograph was taken for how a majority of the SAAs were observed during the visual inspection (see Attachment 3, Photo 2). In addition, I observed SAA containers as large as 125 gallons in volume in SAAs 47 through 54. Mr. Witham stated the containers only held lead contaminated debris which is primarily PPE from operators. Mr. Whitman stated that these containers were not managed as CAA containers although having a volume of larger than 55-gallons. The amount of air in the container would take up enough of the volume in the 125-gallon container that it appeared that PPE waste could be compacted into a 55-gallon container and still would not be considered full. I was unable to determine if 55 gallons or more of hazardous waste could be accumulated in these 125-gallon containers but based on the observation of the volume size of the containers, the following finding was left with the facility:

NOPF 5 – Failure to accumulate no more than 55-gallons of hazardous waste in one SAA. [40 CFR 262.15(a)].

The remainder of SAA containers were labeled with the words “Hazardous Waste”. Despite the issues discussed above, all SAA containers were in good condition, closed, labeled with the indication of the nature of the hazard, and labeled with the words “Hazardous Waste”. I reviewed the management of the SAAs, and no additional issues or findings were noted.

4.6 Batteries Manufacturing

The facility manufactures lead acid batteries for commercial use which generate the facility’s primary hazardous waste, lead contaminated debris. The waste is primarily comprised of PPE waste but includes floor sweepings, scrap envelopes, and pasting belts. PPE consists of covering smocks, booties, and respirator cartridges. The waste is managed as a D008 hazardous waste and is accumulated in 54 SAAs and one CAA on site. The waste profile used to ship the waste off site is provided in Attachment 9.

Maintenance teams work over the weekends to ensure the facility is able to operate as efficiently as possible during the week. During the visual inspection, I observed two parts washers in the maintenance area. I asked Mr. Witham how the parts washers are used on site and what type of parts washer solution is used. The SDS for the parts washer solution is provided in Attachment 12. Mr. Witham stated small hand maintenance tools are cleaned in the parts washer. Mr. Witham stated the facility assumes based on how tools are used, the parts washer solution is not contaminated with D008 wastes. Therefore, the facility managed this waste as a nonhazardous waste. I explained to Mr. Witham that based on the likelihood of contamination with lead throughout the facility, hand tools cleaned in parts washers may be hazardous for D008. I explained to Mr. Witham that if the facility conducted analytical testing on the parts washer waste to determine the constituents of the waste stream, the facility could be more confident in their waste determination. I explained to Mr. Witham that EPA may request additional information on this waste stream. In addition, I explained to Mr. Witham that if the wastes were to be determined to be a D008 hazardous waste, EPA may add additional findings for failure to make an adequate waste determination. Mr. Witham stated Safety Kleen services the parts

washers approximately once every three months. Each parts washer holds approximately 15 gallons of parts washer solution. Therefore, approximately 30 gallons of solution is generated as waste once every three months. I reviewed the management of the parts washers, and no additional issues or findings were noted.

The maintenance team also conducts annual maintenance on cooling tanks in the grid casting area. This is an annual event that generates all waste at once. The waste is antifreeze and is managed as a nonhazardous waste. Mr. Witham stated 1,200 pounds was generated in the most recent clean out operation. The manifest for this shipment of antifreeze is provided in Attachment 13.

Spent flux waste is also generated from excess flux that is wasted during the manufacturing process. This is generated during clean out processes and generates approximately 700 pounds per year. The facility manages this waste in 55-gallon containers as a nonhazardous waste. The SDS for the flux used is provided in Attachment 10. I did not observe any of this waste being generated during my visual inspection.

4.7 Wastewater Treatment Plant

During the visual inspection, I observed a WWTP. The wastewater is generated from washing batteries after leaving the charging process. The wastewater is pumped to the on-site WWTP. The WWTP conducts lead removal and pH adjustment prior to being discharged. After treatment, the water is discharged in accordance with the facility's NPDES permit. The NPDES permit is provided in Attachment 11. Mr. Witham stated the facility discharges approximately 25,000 gallons of wastewater per day. The filter cake waste from the WWTP is shipped off site and recycled/reclaimed. The filter cake is accumulated in 55-gallon containers (see Attachment 3, Photo 12). Lastly, Mr. Witham stated bag house dust is generated from a dust collector filtering out lead dust from the air stream which is placed in a 55-gallon container. Mr. Witham stated the filter cake, waste stream is combined with the scrap metal, dross, lead dust and broken batteries and are shipped off as a scrap metal to be recycled for the metal content in the waste. Mr. Witham stated the wastes are managed under the exclusion 40 CFR 261.4(a)(13). Mr. Witham stated Simons Trucking hauls the waste to Forest City SMT in Forest City, MO for recycling. I reviewed the management of the WWTP and generated wastes and did not note any issues or concerns.

4.8 Aerosol Can Residual Waste

During the visual inspection, I observed one 55-gallon container inside the facility's SAA 43 that accumulated aerosol can residual waste. The facility was managing this waste as a D001 hazardous waste. Mr. Witham explained the facility uses aerosol cans until they are RCRA empty but still punctures the cans out of an abundance of caution. Punctured cans are added to scrap metal containers. The waste is eventually shipped off site at approximately once per year. I did not observe any issues or concerns with the management and generation of aerosol can residual waste on site.

4.9 Universal Waste Accumulation Area

SM manages universal waste lamps and batteries directly inside the hazardous materials building. I observed one 4-foot containers and one 8-foot container of universal waste lamps. Both containers were labeled “Universal Waste Lamps”. The earliest accumulation start date observed was “2/28/2022” on the 8-foot container of universal waste lamps. In addition, I observed three 5-gallon containers of universal waste batteries. The earliest accumulation start date observed was “5/10/2022”. Mr. Witham estimated approximately 200 pounds of universal waste batteries and 2,000 pounds of universal waste lamps are generated per year. The universal waste is shipped off site on manifest to Tradebe Treatment and Recycling LLC in East Chicago (IND000646953) for recycling. A manifest used to ship off universal wastes is provided in Attachment 13 as an example.

I reviewed the management of all universal waste storage areas throughout the facility and no issues or findings were noted.

4.10 Used Oil

At the time of the inspection, I observed used oil being accumulated in 55-gallon containers in the maintenance area (see Attachment 3, Photo 10). The used oil containers were closed, in good condition, labeled “Used Oil”. Mr. Witham explained that facility maintenance of equipment generates used oil. Mr. Witham stated approximately 400 pounds of used oil waste per year. The used oil is hauled off site to Tradebe Treatment and Recycling LLC in East Chicago (IND000646953). Mr. Witham stated used oil filters are punctured and hot drained before being added to scrap metal containers. An example of a manifest for used oil picked up is provided in Attachment 13.

I did not note any issues or findings regarding used oil management during the visual inspection.

4.11 Scrap Metal

Non contaminated lead scrap metal is added to a 30-yard container that is picked up once every two to three weeks. This type of scrap metal waste is taken off site by Alter Metal Recycling in Dubuque, IA for recycling. I did not note any issues or concerns with scrap metal waste.

4.12 Other Regulatory Requirements

Preparedness, Prevention, and Emergency Requirements - Safety and emergency equipment were present and in satisfactory condition in areas throughout the facility, including the hazardous waste CAA and SAAs (as noted in Section 4.4 and 4.5 of this report). Appropriate arrangements and coordination were made with necessary State and local emergency agencies.

I reviewed the preparedness, prevention, and emergency requirements and no issues or findings

were noted.

Contingency Planning Requirements - The contingency plan (see Attachment 15) was reviewed during records review. During the review of the contingency plan, I asked Mr. Witham if the facility had prepared a quick reference. Mr. Witham stated the facility was not aware this was a requirement. I explained the requirements set forth in 40 CFR 262.17(a)(6)→262.262(b). In addition, the contingency plan was most recently revised on February 23, 2022. Based on the discussion and facts listed above, I left the following finding:

NOPF 3 – Failure to prepare a quick reference guide and submit it to emergency response agencies. [40 CFR 262.17(a)(6)→262.262(b)].

The contingency plan did include a list of emergency response equipment and describes their capabilities. The plan also included emergency response procedures, emergency coordinators and contact information. I reviewed the entire RCRA contingency plan and no additional issues or findings were noted.

Personnel Training Requirements – Personnel are to be trained to perform hazardous waste duties, and new employees are to be trained within 6 months of start. The training, at a minimum, must be designed to ensure personnel at SM are able to manage hazardous waste relevant to the positions in which they are employed and respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including:

1. Procedures for using, inspecting, repairing, and replacing facility emergency equipment
2. Communications and alarm systems
3. Response to fires or explosions

Upon reviewing the hazardous waste training employees of SM receive, I determined the training to be sufficient. Mr. Witham stated annual refresher trainings are tracked via attendance sheets and quizzes taken by individuals after training is completed each year. Mr. Witham showed me the attendance sheets during records review. In addition, employees complete a short quiz after the training is completed. I reviewed all employees who manage hazardous waste and emergency coordinators to ensure all personnel receive an annual hazardous waste refresher training. I asked Mr. Witham for training records for all employees. The training records for all emergency coordinators was taken off site as an example and is provided in Attachment 17. It appeared based on attendance sheets/quizzes that the following emergency coordinators have not taken annual hazardous waste refresher training in over one year:

- Dave Meade, 2nd Shift Primary Emergency Coordinator
 - Most recent annual hazardous waste refresher training: 4/26/2021
- Larry Waitman, 2nd Shift Alternate Emergency Coordinator
 - Most recent annual hazardous waste refresher training: 4/26/2021
- Greg (Wallace is his legal name) Hawker 3rd Shift Primary Emergency Coordinator
 - Most recent annual hazardous waste refresher training: 3/18/2021
- Steve Barton 3rd Shift Alternative Emergency Coordinator
 - Most recent annual hazardous waste refresher training: 4/28/2021

The 1st shift emergency coordinators attended training on September 21, 2021. I asked Mr. Witham why the 1st shift emergency coordinators have received training annually but the other have lapsed over one year of refresher training. Mr. Witham stated that himself and Mr. Huber manage the hazardous waste program on site and receive outside training from National Environmental Trainers for annual hazardous waste refresher training. Mr. Witham and Mr. Huber then train other team members and have not conducted an annual training event for the 2nd and 3rd shift emergency coordinators since their respective dates listed above. I asked Mr. Witham and Mr. Huber if a training was scheduled to train the remainder of SM's employees requiring hazardous waste refresher training. Mr. Witham and Mr. Huber stated there is not a training scheduled but the facility would conduct the training within the next month. Therefore, I left the following finding:

NOPF 4 – Failure to refresh hazardous waste training annually. [40 CFR 262.17(a)(7)(iii)].

I reviewed the personnel training requirements, and no additional findings were noted.

Manifest and Land Disposal Restriction (LDR) Requirements – SM maintained records of manifests on site at the time of inspection dating back three years. SM generated approximately 36 manifests over the last three years. I reviewed all 36 hazardous waste manifests. A manifest of the facility D008 hazardous waste being shipped off site is provided in Attachment 16 as an example.

5.0 SUMMARY OF FINDINGS

During the visual inspection, Mr. Witham stated the CAA is inspected weekly and inspections are documented on a log. However, during records review, I only observed monthly inspection logs. Therefore, the following finding was left with the facility:

NOPF 1 – Failure to inspect a CAA at least weekly. [40 CFR 262.17(a)(1)(v)].

I asked Mr. Witham if the facility followed the requirements per 40 CFR 262.17(a)(8)(i)(a) and placed a notice in the operating record within 30 days after closure identifying the location of the unit (CAA). Mr. Witham was unable to provide a document or notice placed in the operating record. Therefore, the following finding was left with the facility:

NOPF 2 – Failure to place a notice in the operating records within 30 days after closure identifying the location of the unit within the facility. [40 CFR 262.17(a)(8)(i)(a)].

SM does not have a quick reference guide included in their contingency plan. Mr. Witham stated the facility was not aware this was a requirement. I explained the requirements set forth in 40 CFR 262.17(a)(6)→262.262(b). In addition, the contingency plan was most recently revised on February 23, 2022. Based on the discussion and facts listed above, I left the following finding:

NOPF 3 – Failure to prepare a quick reference guide and submit it to emergency response agencies. [40 CFR 262.17(a)(6)→262.262(b)].

Mr. Witham and Mr. Huber then train other team members and have not conducted an annual training event for the 2nd and 3rd shift emergency coordinators since their respective dates listed above. I asked Mr. Witham and Mr. Huber if a training was scheduled to train the remainder of SM's employees requiring hazardous waste refresher training. Mr. Witham and Mr. Huber stated there is not a training scheduled but the facility would conduct the training within the next month. Therefore, I left the following finding:

NOPF 4 – Failure to refresh hazardous waste training annually. [40 CFR 262.17(a)(7)(iii)].

The facility used 125-gallon containers in SAAs 47 through 54 to accumulate hazardous waste. Therefore, it could potentially be possible to accumulated more than 55 gallons of hazardous waste in one SAA.

NOPF 5 – Failure to accumulate no more than 55-gallons of hazardous waste in one SAA. [40 CFR 262.15(a)].

I observed no additional issues or findings during this inspection. However, further EPA review may add findings.

Janosh Wolters  Digitally signed by Janosh
Wolters
Date: 2022.08.31 13:45:27
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Janosh Wolters
Energy Engineer
Date: August 31, 2022

AMBER  Digitally signed by AMBER
WHISNANT
Date: 2022.09.19 23:03:49 -05'00'

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

Attachments:

1. Facility Layout (2 pages)
2. Stryten Manchester LLC Photolog (2 pages)
3. Stryten Manchester LLC Photos (12 photos/13 pages)
4. EPA Inspection Checklist (31 pages)
5. Confidentiality Notice (1 page)
6. Receipt of Documents and Samples (1 page)
7. Notice of Preliminary Findings (1 page)
8. Hazardous Waste Site Info Verification Form for Inspector (1 page)
9. Lead Waste Profile (8 pages)

10. Flux SDS (9 pages)
11. NPDES Permit (11 pages)
12. Parts Washer Solution SDS (8 pages)
13. Universal Waste and Used Oil Manifest (2 pages)
14. CAA Inspection Log (5 pages)
15. Contingency Plan (55 pages)
16. Manifest (1 page)
17. Training Records (7 pages)

Notice of Preliminary Findings

(For Contractor Use Only)

Facility Name: Stylen Manchester LLC
Facility Address: 913 S 10th St. Manchester, IA 52057

EPA ID#: IAD069619765 Date: 07/21/2022

Notice: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for the EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to the EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and will make determinations as to what violations may have occurred at your facility.

Citation

Description of Finding

1. 40 CFR 262.17(a)(1)(v)	1. Failure to conduct weekly inspections of a CAA.
2. 40 CFR 262.17(a)(8)(i)(a)	2. Failure to place a notice in the operating record within 30 days after closure identifying the location of the unit within the facility.
3. 40 CFR 262.17(a)(6) → 262.262(b)	3. Failure to prepare a guide reference guide.
4. 40 CFR 262.17(a)(7)(iii)	4. Failure to refresh hazardous waste training annually.
5. 40 CFR 262.15(a)	5. Failure to accumulate no greater than 55-gallons in a SAA.

If you have any questions about this Notice or wish to discuss your response, you may call me at 404-678-8675, or Trevor Urban (Compliance Officer) at 913-551-7133.

This Notice prepared by Janosh Walters Date: 07/21/2022

The undersigned person hereby acknowledges receipt of this Notice and has read the same.

Printed Name: Mitch Hermiston Date: 21 Jul 22

Signature: [Signature]

Title: Plant Manager

Page 1 of 1

(Rev: 2/25/2020)

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