

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

Pella Corporation – Pella Operations

102 Main St.
Pella, IA 50219
(641) 621 - 6695

EPA ID Number: IAD005278502

On

June 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 Pella Corporations – Pella Operations (PC) in Pella, Iowa on June 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

Pella Corporation – Pella Operations:

Peter Dahlgren, Senior Environmental and Safety Engineer

EPA Representative, ERG:

Janosh Wolters, Energy Engineer

Anshul Paripati, Chemical Engineer

3.0 INSPECTION PRECEDURES

After arriving unannounced at PC at approximately 07:50, 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 check in location prior to entering. I introduced myself and signed into the visitor's log. The security team contacted Mr. Peter Dahlgren, Senior Environmental Engineer who greeted us at approximately 08:00 at the main entrance. I introduced myself and presented my inspector credentials to Mr. Dahlgren and explained my reason for being on site is to conduct a RCRA CEI. Mr. Dahlgren led us to a table within the corporate office to begin the opening conference at approximately 08:10. I initiated the opening conference with Mr. Dahlgren as PC's representative. I presented Mr. Dahlgren with my business card, as well as the business card of the EPA Task Order Contracting Officer Representative, Mr. Trevor Urban. Mr. Paripati explained he has not obtained a RCRA credential and was observing the inspection for training purposes. 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. Dahlgren with a copy of the *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections* and reviewed PC's confidentiality rights. I informed Mr. Dahlgren 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. Dahlgren provided a facility layout (see Attachment 1) and explained facility operations and locations of hazardous waste generation and management.

During the visual inspection of the facility, Mr. Dahlgren guided us throughout the facility in order to conduct thorough evaluations of the facility's satellite accumulation areas (SAAs) and central accumulation area (CAA). At the time of the inspection, the facility was operating 22 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. PC does not use parts washers on site. 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.

Nine 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. Dahlgren 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 PC. The following inspection documents and compliance assistance handouts were left with PC:

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

PC began operating in 1925 and currently employs approximately 2,850 people. The facility operates on a five-day, two shift schedule. Occasionally, certain employees are offered to work overtime on a Saturday if manufacturing demands must be met. The facility has a building footprint of approximately 1.2 million square feet. PC operations consist of manufacturing windows and doors for customers. The primary raw materials used are lumber, steel, aluminum coils, paint, and solvents. The major manufacturing or processing operations that generate waste streams include painting and manufacturing windows and doors. The following waste streams are produced: rust remover waste, sulfuric acid, still bottoms, solid wood preservative, lacquer waste, liquid waste paint, solid waste paint, paint related materials, electrical discharge machining filters, immersion cleaner waste, burn ash waste, LabPak waste, ink and cleaning. In addition; solvent contaminated wipes, wastewater treatment sludge, saw dust, glass, oily rags, aerosol can residuals, used oil, 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), PC notified as a federal Large Quantity Generator (LQG) of D001, D002, D005, D006, D007, D008, D027, D035, D039, D040, F003, F005, F019, F027, F032 hazardous wastes. I asked Mr. Dahlgren 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. Dahlgren stated the facility contact should be updated. Besides updating the facility contact, Mr.

Dahlgren 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, D002, D005, D006, D007, D008, D035, D039, D040, D043, F003, F005, U019, and U220 hazardous wastes, a generator of used oil, and a small quantity handler (SQH) of universal waste. PC 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.

PC was previously inspected by EPA on April 18, 2017. The inspection led to a NOPF. The findings included: failure to have accumulation start dates visible for inspection on two hazardous waste accumulation containers, failure to close on hazardous waste accumulation container, failure to document annual RCRA training for an alternative emergency coordinator, and a failure to provide annual RCRA training for an emergency coordinator. 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 PC 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	Rust Remover (Waste profile included in Attachment 9)	Industrial cleaning station that cleans maintenance tools and facility equipment	D002, D006 (based on process knowledge and knowledge of the product)	1,848 pounds per year	55-gallon containers in SAAs before transferred to CAA	Savannah Transport Inc. in Topeka, KS (KS0000336891) to Rineco in Benton, AR (ARD981057870) for storage and transfer
2	Sulfuric Acid	Battery waste	D002 (based on process knowledge and knowledge of the product)	Less than 20 gallons per year	55-gallon containers in SAAs before transferred to CAA	Savannah Transport Inc. in Topeka, KS (KS0000336891) to Rineco in Benton, AR (ARD981057870) for incineration
3	Still Bottoms (Waste profile included in Attachment 10)	Distilling solvent (SDS of virgin solvent included in Attachment 11)	D001, D007, D008, F003, F005 (based on process knowledge and knowledge of the product)	188,491 pounds per year	55-gallon containers in SAAs before transferred to CAA	Savannah Transport Inc. in Topeka, KS (KS0000336891) to Rineco in Benton, AR (ARD981057870) for fuel blending
	See Section 4.6 for more information on the facility's waste determination for this waste stream.					
5	Solid Wood Preservative and Mill Sludge (Waste profiles included in Attachment 12 and Attachment 13)	Water protection and bug protection solvent sprayed onto wood	D001 (based on process knowledge and knowledge of the product)	35,000 pounds per year	55-gallon containers in SAAs before transferred to CAA	Savannah Transport Inc. in Topeka, KS (KS0000336891) to Rineco in Benton, AR (ARD981057870) for fuel blending

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
6	Waste Lacquer (Waste profile included in Attachment 14)	Cleaning equipment with wipes/wiping down paint booth components	D001, D035, F003, F005 (based on process knowledge and knowledge of the product)	102,112 pounds per year	55-gallon containers in SAAs before transferred to CAA	Savannah Transport Inc. in Topeka, KS (KS0000336891) to Rineco in Benton, AR (ARD981057870) for fuel blending
7	Liquid Waste Paint (Waste profile in Attachment 15)	Excess paint	D001, D005, D007, F003, F005 (based on process knowledge and knowledge of the product)	21,919 pounds per year	55-gallon containers in SAAs before transferred to CAA	Savannah Transport Inc. in Topeka, KS (KS0000336891) to Rineco in Benton, AR (ARD981057870) for fuel blending
	See Section 4.6 for more information on the facility's waste determination for this waste stream.					
8	Solid Waste Paint (Waste profile included in Attachment 16)	Dried paint booth filters, could include rags	D001, D005, D007, F003, F005 (based on process knowledge and knowledge of the product)	3,659 pounds per year	55-gallon containers in SAAs before transferred to CAA	Savannah Transport Inc. in Topeka, KS (KS0000336891) to Rineco in Benton, AR (ARD981057870) for energy recovery
	See Section 4.6 for more information on the facility's waste determination for this waste stream.					
9	Solid Paint Related Materials (Waste profile included in Attachment 17)	PPE and dried filters	D005, D007 (based on process knowledge and knowledge of the product)	191,739 pounds per year	55-gallon containers in SAAs before transferred to CAA	Savannah Transport Inc. in Topeka, KS (KS0000336891) to Rineco in Benton, AR (ARD981057870) for energy recovery
	See Section 4.6 for more information on the facility's waste determination for this waste stream.					

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
10	Electrical Discharge Machining (EDM) Filters (Waste profile included in Attachment 18)	Enclosed spark machining operation	D007 (based on process knowledge and knowledge of the product)	3,620 pounds per year	55-gallon containers in SAAs before transferred to CAA	Savannah Transport Inc. in Topeka, KS (KS0000336891) to Rineco in Benton, AR (ARD981057870) for incineration
11	Immersion Cleaner (Waste profile included in Attachment 19)	Cleaning maintenance parts for facility equipment	D039, D040 (based on process knowledge and knowledge of the product) (SDS included in Attachment 20)	162 pounds	Inside 6-gallon parts washer	Safety Kleen Systems Inc. in Denton, TX (TXR000081205) to Pioneer Tank Lines (MND044176113) in Afton, Minnesota to Safety Kleen Systems Inc. (ILD980613913) to Dolton, IL for incineration
	See Section 4.8 for the facility's waste determination.					
12	Burn Ash Waste (Waste profile included in Attachment 21)	Paint from automated hangers that is burned off hangers in oven	D007 (based on process knowledge and knowledge of the product)	6,315 pounds per year	55-gallon containers in SAA before transferred to CAA	Savannah Transport Inc. in Topeka, KS (KS0000336891) to Rineco in Benton, AR (ARD981057870) for energy recovery
	See Section 4.7 for the facility's waste determination.					

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
13	LabPak	QC laboratory testing	D001, D002, D003, D007, D018, U019, U220 (based on process knowledge and knowledge of the product)	48 pounds per year	55-gallon container in CAA	Clean Harbors Environmental Services (MAD039322250) in Norwell, MA to Clean Harbors Aragonite LLC (UTD981552177) in Grantsville, UT for incineration
14	Barcode Cleaning Waste (Waste profile included in Attachment 22)	Cleaning barcode labeler during facility maintenance	D001, D007, D035, D043 (based on process knowledge and knowledge of the product) (SDS included in Attachment 23)	329 pounds per year	55-gallon containers in SAAs before transferred to CAA	Savannah Transport Inc. in Topeka, KS (KS0000336891) to Rineco in Benton, AR (ARD981057870) for fuel blending
	See Section 4.10 for the facility's waste determination.					
15	Solvent Contaminated Wipes	Wipes used for wiping off products	Excluded per 40 CFR 261.4(a)(26) - (based on process knowledge and knowledge of the product)	6,000 pounds per year	5-gallon containers	MidWest Sanitation in Des Moines, IA to South Central Iowa Solid Waste Agency Landfill in Tracey, IA for landfill
	See Section 4.9 for the facility's waste determination.					

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
16	Aerosol Can Residuals	Puncturing RCRA empty containers	D001, D005, D007, F003, F005 (based on process knowledge and knowledge of the product)	Less 5 gallons per year	55-gallon container is added to liquid waste paint container in CAA	Savannah Transport Inc. in Topeka, KS (KS0000336891) to Rineco in Benton, AR (ARD981057870) for fuel blending
17	Oily Rags	Wiping off oils and greases from maintenance tools	Nonhazardous (based on process knowledge and knowledge of the product)	One 55-gallon container picked up weekly	55-gallon container	Village Cleaners in Pella, IA for laundering (Invoice included in Attachment 24)
18	Used Oil	Facility maintenance of equipment	Exempted (managed as used oil per 40 CFR 279)	One 55-gallon container every two months	55-gallon containers	Safety-Kleen Systems Inc. (MAD039322250) in Norwell, MA for recycling
19	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	40-yard container	Rosenman's Inc. Steel Service Center in Ottumwa, IA for recycling
20	Scrap Metal	Facility operations	Excluded (based on management and process knowledge) recycled as scrap metal	40-yard container picked up once or twice a year	40-yard container	Rosenman's Inc. Steel Service Center in Ottumwa, IA for recycling (Invoice included in Attachment 25)

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
21	Universal Waste Lamps	Facility maintenance	Exempted (managed as universal waste per 40 CFR 273)	600 – 800 lamps per year	4-foot containers and 8-foot containers	A-TEC Recycling Inc. in Des Moines, IA (IA0000109827) for recycling
22	Universal Waste Batteries	Facility maintenance	Exempted (managed as universal waste per 40 CFR 273)	Two 55-gallon containers every six months	55-gallon container	Savannah Transport Inc. in Topeka, KS (KS0000336891) to Rineco in Benton, AR (ARD981057870) for recycling
23	Wastewater Treatment Sludge (Special Waste Authorization (SWA) included in Attachment 26)	Facility wastewater treatment plant filter cake sludge	Nonhazardous (based on process knowledge, knowledge of the product, and analytical testing) (Analytical report included in Attachment 27)	9,000 pounds every three months	55-gallon containers	MidWest Sanitation in Des Moines, IA to South Central Iowa Solid Waste Agency Landfill in Tracey, IA for landfill
24	Wastewater	Washing off parts prior to painting	Nonhazardous (based on process knowledge and knowledge of the product)	Discharge 50,000 gallons per day	Discharged to Publicly Owned Treatment Works (POTW) in Pella, IA	POTW in Pella, IA for treatment
25	Broken Glass	Facility operations and glass breaking from windows	Nonhazardous (based on process knowledge and knowledge of the product)	40-yard container picked up weekly	40-yard container	MidWest Sanitation in Des Moines, IA to South Central Iowa Solid Waste Agency Landfill in Tracey, IA for landfill

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
26	Saw Dust	Cutting of lumber	Nonhazardous (based on process knowledge and knowledge of the product)	Unknown – not tracked	Conveyed directly over to neighboring business (American Wood Fibers)	Conveyed to American Wood Fibers to be remanufactured into various wood products
27	General Trash	Facility operations	Nonhazardous (based on process knowledge and knowledge of the product)	Two 40-yard container picked up weekly	40-yard container	MidWest Sanitation in Des Moines, IA to South Central Iowa Solid Waste Agency Landfill in Tracey, IA for landfill

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

PC has one Less-Than-90-Day CAA on site, which is located outside of Area III as labeled on the facility layout (see Attachment 1). The CAA is a standalone structure that is used solely for storing wastes. I visually inspected the CAA and observed a total of six 55-gallon containers of paint related waste. In addition, I observed six 55-gallon containers of still bottoms, three 55-gallon containers wood preservative waste, one 55-gallon container of burn ash waste, one 55-gallon container of lacquer waste, and one 55-gallon container of waste paint (see Attachment 3, Photo 9). The facility managed all these containers as hazardous waste. All hazardous waste containers were closed, 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 “6/2/2022” on a 55-gallon container of waste paint. June 2, 2022 is within 90 days from the time of the inspection.

I observed adequate aisle space to allow for container inspections and access in the event of a spill. Mr. Dahlgren stated that if the facility were to have a spill, the floor inside the building would act as the secondary containment until the spill could be cleaned up. In addition, any incompatible wastes are stored on opposite sides of the building and are stored on secondary containment pallets. 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. I asked Mr. Dahlgren if the facility inspected the CAA. Mr. Dahlgren stated the facility inspected the CAA at least weekly and had weekly inspection logs.

During records review, Mr. Dahlgren provided inspection logs for the CAA. I reviewed the logs and determined the facility was adequately performing weekly inspections of the CAA. An example of a CAA log is provided in Attachment 28.

I did not note any issues or findings at the CAA during the inspection. However, I did note one finding regarding a previous CAA that was no longer in use. The CAA was previously located where SAA 15 was observed. See the end of Section 4.5 for more information on this finding.

4.5 Satellite Accumulation Areas

I observed 22 satellite areas during the visual inspection. The table on the next page shows the SAA name or location, waste type, volume of waste observed, and container type.

SAA #	SAA Name or Location	Waste Type	Volume of Waste	Container Type
1	Area 1 Solvent Room	Lacquer Waste	30 gallons	55-gallon container
2	Area 1 Wood Treat	Wood Preserver Waste	20 gallons	55-gallon container
3	Area 2 Maintenance Shop	Barcode Cleaning Waste	5 gallons	55-gallon container
4	Area 2 Lacquer Booth	Lacquer Waste	20 gallons	55-gallon container
5	Area 2 Southern Wall	Wood Preserver Waste	25 gallons	55-gallon container
6	Area 3 Maroon Cell	Wood Preserver Waste	30 gallons	55-gallon container
7	Area 3 Blue Cell	Wood Preserver Waste	35 gallons	55-gallon container
8	Area 3 RTP Cell	Wood Preserver Waste	25 gallons	55-gallon container
9	Area 3 South Door	Lacquer Waste	20 gallons	55-gallon container
10	Battery Charging Station	Sulfuric Acid	25 gallons	55-gallon container
11	Area 3 Wood Treat Area	Wood Preserver Waste	20 gallons	55-gallon container
12	Maintenance Paint Booth	Lacquer Waste	35 gallons	55-gallon container
13	Maintenance Shop	Rust Remover	20 gallons	55-gallon container
14	EDM Operations	EDM Filters	15 gallons	55-gallon container
15	Solvent Still	Solvent Wipes (Butyl Acetate)	2 gallons	5-gallon container
16	Vertical Paint Line	Solid Waste Paint	30 gallons	55-gallon container
17	Vertical Paint Line	Solid Paint Related Materials	30 gallons	55-gallon container
18	Vertical Paint Line	Lacquer Waste	25 gallons	55-gallon container
19	Burn Off Oven	Burn Ash	25 gallons	55-gallon container
20	Horizontal Paint Line	Waste Lacquer	20 gallons	55-gallon container
21	Horizontal Paint Line	Solid Paint Related Materials	30 gallons	55-gallon container
22	Solvent Still	Still Bottoms	0 gallons	55-gallon container

During the visual inspection, I observed the 22 SAAs. An example photograph was taken for how a majority of the SAAs were observed during the visual inspection (see Attachment 3, Photo 3). I observed a 55-gallon container of tert butyl acetate waste being accumulated in SAA 20. The SAA 20 was located in the horizontal paint line. Based on how the facility manages the horizontal paint line room, they did not allow any devices that were not intrinsically safe inside the building. Therefore, I was unable to take a photograph of SAA 21. I visually inspected the 55-gallon container in SAA 21 and observed a “Flammable Liquid” placard but did not observe the words “Hazardous Waste” on the container. I asked Mr. Dahlgren why the 55-gallon

container was not labeled with the words “Hazardous Waste”. Mr. Dahlgren stated the container should have been labeled with the words “Hazardous Waste” and immediately added a labeled with the words “Hazardous Waste” onto the container. Upon initial inspection of the 55-gallon container observed in SAA 21, I did not observe the container to be labeled with the words “Hazardous Waste”, therefore, the following finding was left with the facility:

NOPF 1 – Failure to have the words “Hazardous Waste” on a SAA container. [40 CFR 262.15(a)(5)(i)].

The remainder of SAA containers were labeled with the words “Hazardous Waste”. During the visual inspection, I observed two SAA 55-gallon containers located directly next to each other in the vertical paint line area. Based on how the facility manages the vertical paint line room, they did not allow any devices that were not intrinsically safe inside the building. Therefore, I was unable to take a photograph of SAA 17 and SAA 18. However, the 55-gallon container in SAA 17 was placed within two feet of the 55-gallon container in SAA 18. The 55-gallon container in SAA 17 was accumulating approximately 30 gallons of toxic paint related material (PPE, paint booth filters) and was being managed as a D005, and D007 solid hazardous waste. The 55-gallon container in SAA 18 was accumulating approximately 20-25 gallons of Lacquer waste and was being managed as a D001, D035, F003, and F005 hazardous waste. I asked Mr. Dahlgren when these containers are moved out of the SAA locations. Mr. Dahlgren stated when a SAA container is full, it is moved within 72-hours to the CAA. I asked Mr. Dahlgren how the facility ensures no more than 55-gallons of hazardous waste is accumulated in this location. Mr. Dahlgren stated because the SAA containers were not accumulating the same type of hazardous waste, each container is allowed to accumulate no greater than 55-gallons. I explained to Mr. Dahlgren that 40 CFR 262.15(a) states “A generator may accumulate as much as 55 gallons of non-acute hazardous waste and/or either one quart of liquid acute hazardous waste listed in § 261.31 or § 261.33(e) of this chapter or 1 kg (2.2 lbs) of solid acute hazardous waste listed in § 261.31 or § 261.33(e) of this chapter in containers at or near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with the requirements of parts 124, 264 through 267, and 270 of this chapter, provided that all of the conditions for exemption in this section are met.” Based on Mr. Dahlgren’s statements, the facility appears to potentially accumulate more than 55-gallons of hazardous waste in what could potentially be considered one SAA. Therefore, the following finding was left with the facility:

NOPF 2 – Failure to accumulate no more than 55-gallons of hazardous waste in one SAA. [40 CFR 262.15(a)].

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” (with the exception of the 55-gallon container in SAA 21).

During the visual inspection of SAA 15, I observed the facility layout showed a “90-day Storage” area labeled as shown on Attachment 1. I asked Mr. Dahlgren if this area was a CAA. Mr. Dahlgren stated to the best of his knowledge, it is not currently managed as a CAA. I asked

Mr. Dahlgren when this area stopped being managed as a CAA. Mr. Dahlgren was unsure of when PC stopped using this CAA. I asked Mr. Dahlgren 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. Dahlgren stated he did not know of this requirement. In addition, during records review, Mr. Dahlgren was unable to locate any notice that was placed in PC's operating record. Therefore, the following finding was left with the facility:

NOPF 3 – Failure to place a notice in the operating record within 30 days of closure identifying the location of the unit within the facility. [40 CFR 262.17(a)(8)(i)(a)].

I reviewed the management of the SAAs, and no additional issues or findings were noted.

4.6 Painting Operations/Distillation Column

The facility operates a horizontal and vertical paint line on site. The horizontal paint line refers to products that are painting horizontally. The vertical paint line refers to products that are painted vertically. Both paint lines are automated, and the facility uses a conveyor system with hangers to hang products that are painted.

Mr. Dahlgren explained that the facility flushes the automated paint lines as needed. The automated paint lines are hard pipe connected to a 500-gallon solvent tank. The 500-gallon solvent tank holds a mixture of reclaimed and virgin solvent of tert-butyl acetate. As lines are flushed, the solvent is hard piped back to the distillation unit. The purged solvent is first accumulated in a 415 gallon "dirty" solvent tank that is connected to the distillation unit. The distillation unit runs a batch process of approximately 100 gallons per batch. I visually inspected all hard piping lines from the automated paint lines back to entering the 415 gallon "dirty" solvent tank. During the visual inspection, Mr. Mark Bender, Pretreat Technician explained the distillation unit process. I asked Mr. Bender if the facility ever adds containers of purged solvent into the distillation unit or the "dirty" solvent tank. Mr. Bender stated the only way purged solvent can enter the distillation unit is from the hard piping that is connected to the paint lines that enter the 415 gallon "dirty" solvent tank. I asked Mr. Bender approximately how often the distillation unit is operating. Mr. Bender stated the distillation unit is almost continuously running during operating hours. The facility manages the "dirty" solvent sent for recycling under the closed loop exemption per 40 CFR 261.4(a)(8).

I asked Mr. Bender how often virgin solvent is purchased and how it is added to the process. Mr. Bender explained PC receives 300-500 gallons of virgin solvent weekly that is placed into a 500-gallon virgin solvent tank that is located in the same area as the distillation unit. Mr. Bender explained the virgin solvent is added to the 500-gallon reclaimed tank that is connected to the distillation unit. Mr. Bender stated the distillation unit cannot reclaim enough solvent fast enough. As a result, PC is forced to add virgin solvent to the reclaimed tank weekly. Mr. Bender was not able to state the efficiency of the distillation unit but was aware that it was at least 75-80

percent efficient. Mr. Bender also explained that still bottoms are generated as a result of running the distillation unit. Mr. Bender explained that still bottoms are accumulated in a 55-gallon container directly under the distillation unit. At the time of the inspection, I did not observe a 55-gallon container of still bottoms underneath the distillation unit. I asked Mr. Bender where the still bottoms were being accumulated. Mr. Bender stated the still bottoms drum was being moved to the CAA during the time of our visual inspection of the distillation unit. Based on how the facility manages the distillation unit room, they did not allow any devices that were not intrinsically safe inside the building. Therefore, I was unable to take a photograph of distillation unit.

During records review, I observed the facility managing the still bottoms waste as a D001, D007, D008, F003, and F005 hazardous waste. I asked Mr. Dahlgren why the facility managed the still bottoms waste with the D007 and D008 waste codes. Mr. Dahlgren stated he believed the facility did this out of an abundance of caution but does not believe the still bottoms waste to be hazardous for D007 (chromium) or D008 (lead). The SDS for the solvent-based paint used on site is provided in Attachment 29. The SDS for the solvent used to flush paint lines is provided in Attachment 11. These SDSs both indicate that it appears the waste would not be hazardous for either D007 or D008. However, the waste profile for this waste stream is provided in Attachment 10 and indicates the waste is hazardous for D007 and D008.

In addition, the facility manages solid paint waste generated from paint booth equipment cleaning operations with the following EPA waste codes: D001, D005, D007, F003, and F005. Based on how painting operations occur on site and the types of paint used, it does not appear based on a records review that the paint waste would need to include D005 or D007. Mr. Dahlgren stated he believes the waste stream most likely does not need these waste codes, but the facility added them out of an abundance of caution. Solid paint related debris (PPE) was managed as a D005 and D007 hazardous waste per the waste profile in Attachment 16. Mr. Dahlgren stated the facility generates this waste by PPE waste for members that work in the painting line areas. Mr. Dahlgren stated the facility manages this waste with the hazardous waste codes out of an abundance of caution.

The facility manages excess paint waste with the following waste codes: D001, D005, D007, F003, and F005. I asked Mr. Dahlgren how this waste is generated. Mr. Dahlgren stated this waste is generated when excess unused waste paint from a painting operation is containerized into 55-gallon containers. I asked Mr. Dahlgren if the paint was in contact with spent solvent. Mr. Dahlgren stated the excess paint would only be product paint that was waste because it was excess in the paint lines after a painting operation. The waste profile for this waste stream is provided in Attachment 15. The SDS for solvent-based paint used on site is provided in Attachment 29. I explained that based on how he described the waste to be generated and the SDSs reviewed, it appears the facility does not need to manage the waste as an F003 and F005 hazardous waste because it is not a spent solvent waste. Mr. Dahlgren stated he believes the facility manages the waste with all the EPA waste codes listed above out of an abundance of caution. Upon further

EPA review, a finding may be added for inadequate waste determinations. The facility appeared to be overclassifying multiple waste streams.

During painting operations, the facility uses a mineral spirits mixture which is referred to as lacquer in this report and at the facility. This lacquer is used to clean up dried paint off equipment or sprayed products. Mr. Dahlgren explained the facility uses rags during this process and manages these rags as a D001, D035, F003, and F005 hazardous waste. The waste profile is provided in Attachment 14. I observed lacquer waste in five SAAs throughout the facility.

Lastly, Mr. Dahlgren stated the facility does conduct smaller automated paint operations that use a water-based paint. These painting operations did not include the need of any hazardous solvents for cleaning. The SDS is provided in Attachment 30 as an example of water-based paints used on site.

I did not note any additional issues or concerns with the management and operation of painting operations on site.

4.7 Burn Off Oven

During the visual inspection, Mr. Dahlgren explained that hangers used to hold products conveyed through the automated paint lines accumulate dried paint after being run through the automated paint lines multiple times. Mr. Dahlgren stated the hangers are then placed into an oven located near SAA 19 as labeled on the facility layout (see Attachment 1). The dried paint drops to the floor of the oven which is then swept and put into a 55-gallon container in SAA 19. Mr. Dahlgren stated the paint is completely dried before entering the oven and has not come into contact with any solvents or other materials besides excess overspray from automated paint guns. At the time of the inspection, Mr. Dahlgren stated the facility was managing this ash waste as a D007 hazardous waste. The SDS for the solvent-based paint used in the painting operations is provided in Attachment 29. Mr. Dahlgren stated that to the best of his knowledge, this is the only solvent-based paint the facility was currently using. Based on this SDS of the paint and that the paint is completely dried prior to being burned, it appears the facility is managing a nonhazardous waste as a D007 hazardous waste. I explained to Mr. Dahlgren that the waste did not appear to be D007 hazardous waste. Mr. Dahlgren stated he did not believe the waste to be a D007 hazardous waste. He believed the facility was managing this waste as a hazardous waste out of an abundance of caution. I did not observe any additional issues or concerns with the management and operation of the burn off oven.

4.8 Immersion Cleaner

During the visual inspection, I observed an immersion cleaner in the maintenance shop as labeled on the facility layout (Attachment 1). The immersion cleaner appeared to be in good condition (see Attachment 3, Photo 7). Mr. Dahlgren explained the immersion cleaner is used to clean small maintenance tools or parts as needed. I asked Mr. Dahlgren what type of solution is

used in the immersion cleaner. During records review, Mr. Dahlgren provided the SDS for the immersion cleaner which is provided in Attachment 20. I reviewed the SDS and waste profile for the immersion cleaner (see Attachment 19). In addition, while reviewing manifests, I observed a manifest that included the shipment of immersion cleaner. The manifest observed is provided in Attachment 31. At the time of the inspection, PC was managing this waste as a D039 and D040 hazardous waste. I asked Mr. Dahlgren why the facility was managing this waste as a D039 and D040 hazardous waste. Mr. Dahlgren stated the facility was instructed by Safety Kleen, the company who services the immersion cleaner would not service the immersion cleaner waste unless it was managed as D039 and D040 hazardous waste. During the inspection, I did not observe anything on site that would generate a D039 or D040 hazardous waste. I explained to Mr. Dahlgren that based on the SDS, it appears the waste generated from this operation would be nonhazardous unless other hazardous materials are comingled with the immersion cleaner. Mr. Dahlgren stated the immersion cleaner waste would not become comingled with any hazardous materials based on the facility's use of the immersion cleaner. I did not observe any additional issues or concerns with the management and operation of the immersion cleaner.

4.9 Solvent Contaminated Wipes

Mr. Dahlgren stated the facility generated solvent contaminated wipes on site. The facility purchases disposal rags that are used throughout the facility. Wipes are usually used to clean off final products to remove imperfections. Mr. Dahlgren stated the facility would use tert butyl acetate for these cleaning operations. Mr. Dahlgren stated the wipes do not contain free liquids when entering the 5-gallon containers that accumulate solvent contaminated wipes throughout the facility (see Attachment 3, Photo 2). Mr. Dahlgren stated rags are added to general trash containers at least once every 180 days. I asked Mr. Dahlgren how the facility ensures wipes are removed from the 5-gallon accumulation containers and added to general trash at least once every 180 days. During records review, Mr. Dahlgren provided the facility's SOP for the management of solvent contaminated wipes which is included in Attachment 32. I explained to Mr. Dahlgren that the state of Iowa does not allow for any hazardous waste to be disposed of at a landfill. Mr. Dahlgren stated his coworkers and himself need to address the issue of potentially sending a federally exempted hazardous waste to a landfill in the state of Iowa. I thoroughly reviewed the requirements set forth in 40 CFR 261.4(b)(18) and documented the facility's compliance in the *EPA Inspection Checklist* (see Attachment 4). I did not observe any issues or concerns with the management and generation of solvent contaminated wipes on site.

4.10 Barcode Cleaning Waste

During the visual inspection, Mr. Dahlgren explained the facility generates ink and cleaning solution waste when cleaning off barcode scanners on site. The waste profile used for this waste is provided in Attachment 22. The SDS is included in Attachment 23. The facility was managing this waste as a D001, D007, D035, and D043 hazardous waste. I asked Mr. Dahlgren how this waste is generated. Mr. Dahlgren stated the barcodes are wiped with a disposable wipe and excess ink comes off. I asked Mr. Dahlgren why the waste was managed with the D007 and

D043 waste codes. Mr. Dahlgren stated he was unsure. I explained to Mr. Dahlgren that based on a review of the SDS and how the waste is generated, it does not appear to be a D007 or D043 hazardous waste. Upon further EPA review, a finding may be added for an inadequate waste determination. I did not observe any issues or concerns with the management and generation of barcode cleaning waste on site.

4.11 Aerosol Can Residual Waste

During the visual inspection, I observed one 55-gallon container inside the facility's CAA that accumulated aerosol can residual waste. The facility was managing this waste as a D001, D005, D007, F003, F005 hazardous waste. Mr. Dahlgren explained the facility uses aerosol cans until they are RCRA empty but still punctures the cans out of an abundance of caution. The waste is eventually comingled with liquid paint waste and shipped off site at least once per year. I did not observe any issues or concerns with the management and generation of aerosol can residual waste on site.

4.12 Universal Waste Accumulation Area

PC manages universal waste lamps directly inside the eastern entrance door to Area IV as labeled on the facility layout (see Attachment 1). I observed two 4-foot containers and one 8-foot containers of universal waste lamps (see Attachment 3, Photo 5). All three containers were labeled "Universal Waste Lamps". The earliest accumulation start observed was "3/17/2022" on the 4-foot container of universal waste lamps. In addition, PC manages universal waste batteries next to the facility's CAA as labeled on the facility layout (see Attachment 1). At the time of the inspection, I did not visually observe a container accumulating universal waste batteries on site. Mr. Dahlgren stated a 55-gallon container is placed next to the CAA which accumulates universal waste batteries as needed and is picked up by the same hazardous waste vendor PC uses. Mr. Dahlgren estimated approximately two 55-gallon containers are shipped off each year, approximately every six months. Mr. Dahlgren believed a shipment had just recently occurred.

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

4.13 Wastewater

PC generates wastewater waste during pretreatments for products to be painted. PC has an on-site wastewater treatment plant (WWTP). Mr. Dahlgren explained the facility manages filter cake waste in a supersack that has a volume of approximately 74 cubic feet (see Attachment 3, Photo 8). Mr. Dahlgren stated PC has conducted analytical sampling to manage the filter cake waste from the on-site WWTP as a nonhazardous waste. The filter cake sludge is not generated from processes such as chromating, phosphating, metal coloring, and/or immersion plating. Therefore, it does not appear the F019 waste code would apply to this waste stream. The analytical study was conducted to allow PC to send filter cake off site under a SWA. The SWA is included in Attachment 26. The analytical report is included in Attachment 27. Mr. Dahlgren

stated PC had an agreement with the local POTW but could not provide me with a copy of the agreement at the time of the inspection. I asked Mr. Dahlgren what type of pretreatment solutions are used during pretreatment cleaning operations. Mr. Dahlgren stated PC uses a generic pretreatment cleaner, an aluminum adhesion solution to allow paint to better adhere to products. In addition, an aluminum coating is used on products. The SDS for the generic cleaner, aluminum adhesion solution, and aluminum coating are provided in Attachment's 33, 34, and 35, respectively.

I did not note any issues or findings regarding the management of wastewater or WWTP filter cake during the visual inspection.

4.14 Used Oil

At the time of the inspection, I did observe used oil being accumulated in 55-gallon containers (see Attachment 3, Photo 6). The used oil container was closed, in good condition, labeled "Used Oil". Mr. Dahlgren explained that facility maintenance of equipment generates used oil. Mr. Dahlgren stated approximately one 55-gallon container is generated every two months. The used oil is hauled off site by Safety-Kleen Systems Inc. (MAD039322250) in Norwell, MA for recycling. Mr. Dahlgren stated used oil filters are punctured and hot drained before being added to scrap metal containers. An example of an invoice for used oil picked up is provided in Attachment 36.

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

4.15 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 37) was in a binder and was reviewed while on site. The contingency plan included a complete emergency evacuation plan, a list of emergency response equipment and describes their capabilities. The plan also included emergency response procedures, emergency coordinators and contact information. In addition, the facility had a preparation quick reference guide that was also reviewed while on site. The quick reference guide is provided in Attachment 38. The contingency plan and quick reference guide were most recently revised on February 27, 2018.

I continued reviewing the contingency plan and noted the facility submitted the contingency plan to local emergency response agencies including the local police department, fire department, and hospital. I reviewed the entire RCRA contingency plan and no 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 PC 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 PC receive, I determined the training to be sufficient. Mr. Dahlgren stated annual refresher trainings are tracked via attendance sheets. Mr. Dahlgren showed me the attendance sheets doing 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 determined all emergency coordinators and employees who require annual refresher training were up to date on their trainings. Examples of quizzes are provided in Attachment 39.

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

Manifest and Land Disposal Restriction (LDR) Requirements – PC maintained records of manifests on site at the time of inspection dating back three years. PC generated approximately 120 manifests over the last three years. I reviewed all 120 hazardous waste manifests. A manifest of immersion cleaner and a LabPak shipment and corresponding LDR forms are provided in Attachment 31 and 40, respectively as examples.

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

5.0 SUMMARY OF FINDINGS

Upon initial inspection of the 55-gallon container observed in SAA 21, I did not observe the container to be labeled with the words “Hazardous Waste”, therefore, the following finding was left with the facility:

NOPF 1 – Failure to have the words “Hazardous Waste” on a SAA container. [40 CFR 262.15(a)(5)(i)].

I observed two SAA 55-gallon containers located directly next to each other in the vertical paint line area. Based on Mr. Dahlgren’s statements, the facility appears to potentially accumulate more than 55-gallons of hazardous waste in what could potentially be considered one SAA. Therefore, the following finding was left with the facility:

NOPF 2 – Failure to accumulate no more than 55-gallons of hazardous waste in one SAA. [40 CFR 262.15(a)].

During records review, Mr. Dahlgren was unable to locate any notice that was placed in PC's operating record for the closure of a previously used CAA. Therefore, the following finding was left with the facility:

NOPF 3 – Failure to place a notice in the operating record within 30 days of closure identifying the location of the unit within the facility. [40 CFR 262.17(a)(8)(i)(a)].

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

**Janosh
Wolters**

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Janosh Wolters
Date: 2022.08.19
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Janosh Wolters
Energy Engineer
Date: August 19, 2022

**CANDACE
BEDNAR**

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Date: 2022.08.19 15:11:08 -05'00'

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

Attachments:

1. Facility Layout (1 page)
2. Pella Corporation - Pella Operations Photolog (1 page)
3. Pella Corporation – Pella Operations Photos (9 photos/10 pages)
4. EPA Inspection Checklist (36 pages)
5. Confidentiality Notice (1 page)
6. Receipt for Documents and Samples (1 page)
7. Notice of Preliminary Findings (1 page)
8. Hazardous Waste Site Info Verification Report for Inspector (1 pages)
9. Rust Remover Waste Profile (5 pages)
10. Still Bottoms Waste Profile (5 pages)
11. Flushing Solvent SDS (9 pages)

12. Mill Sludge Waste Profile (5 pages)
13. Wood Preserver Waste Profile Real (5 pages)
14. Waste Lacquer Waste Profile (5 pages)
15. Liquid Waste Paint Waste Profile (5 pages)
16. Solid Waste Paint Waste Profile (5 pages)
17. Paint Related Material Waste Profile (5 pages)
18. EDM Filters (5 pages)
19. Immersion Cleaner Waste Profile (5 pages)
20. Immersion Cleaner SDS (15 pages)
21. Burn Ash Waste Profile (5 pages)
22. Ink Waste Profile (7 pages)
23. Ink SDS (18 pages)
24. Laundered Rags Receipt (1 page)
25. Scrap Metal Vendor Information (1 page)
26. SWA for WWTP Sludge (1 page)
27. WWTP Sludge TCLP Analytical (7 pages)
28. CAA Inspection Log (1 page)
29. Solvent Based Paint SDS (17 pages)
30. Water Based Paint SDS (10 pages)
31. Immersion Cleaner Manifest (2 pages)
32. SOP Solvent Contaminated Wipes (1 page)
33. Pretreat SDS (7 pages)
34. Aluminum Adhesion SDS (6 pages)
35. Prewash Aluminum Coating (7 pages)
36. Used Oil Invoice (2 pages)
37. Contingency Plan (57 pages)
38. Quick Reference Guide (11 pages)
39. RCRA Training Record Quizzes (5 pages)
40. LabPak Manifest (4 pages)

Notice of Preliminary Findings

(For Contractor Use Only)

Facility Name: Pella Corporation - Pella Operations

Facility Address: 102 Main St.
Pella, Iowa 50219

EPA ID#: IAD005278502 Date: 06/21/2022

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

- | | |
|-------------------------------------|--|
| <u>1. 40 CFR 262.15(s)(i)</u> | <u>1. Failure to have the words "Hazardous Waste"</u> |
| <u>2. 40 CFR 262.15(a)</u> | <u>on a SAA container.</u> |
| <u>3. 40 CFR 262.17(a)(2)(i)(a)</u> | <u>2. Failure to accumulate no greater than 55-gallons</u> |
| | <u>in one SAA.</u> |
| | <u>3. Failure to place a notice in the operating record</u> |
| | <u>within 30 days after closure identifying the location</u> |
| | <u>of the unit within the facility.</u> |
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If you have any questions about this Notice or wish to discuss your response, you may call me at
484-678-8675, or Trevor Urban (Compliance Officer)
at 913-551-7133.

This Notice prepared by Janosh Walters Date: 06/21/2022

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

Printed Name: PETER DAHLGREN Date: 6-21-2022

Signature: Peter Dahlgren

Title: SR ENV ENGINEER