

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

FEDERAL-MOGUL IGNITION LLC

3009 Sylvania Drive
Burlington, Iowa 52601
319-768-5907

EPA ID Number: IAD000805143

On

January 12, 2022

By

TOEROEK ASSOCIATES, INC.

For

U. S. ENVIRONMENTAL PROTECTION AGENCY

Region 7

Enforcement and Compliance Assurance Division

INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division/Chemical Branch/RCRA Section (ECAD/CB/RCRA) of the U. S. Environmental Protection Agency (EPA) Region 7, Toeroek Associates, Inc. and its subcontractor CLAENE Group (Toeroek team) conducted a hazardous waste compliance evaluation inspection (CEI) at Federal-Mogul Ignition LLC (Federal), at 3009 Sylvania Drive in Burlington, Iowa. The CEI was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. The CEI covered hazardous waste generator requirements, used oil management, and universal waste requirements. This report and its attachments present the results of the CEI.

PARTICIPANTS

Federal:

Jim Spence, Environmental/Facilities Coordinator

Toeroek Team:

Clifford Nelles, Inspector, 816-213-5192

INSPECTION PROCEDURES

Due to the spread of coronavirus disease 2019 (COVID-19) at the time of the CEI, I contacted Mr. Spence via telephone approximately two weeks prior to the scheduled inspection in October 2021. The purpose of the initial contact was to identify the appropriate facility representative, ensure the representative would be available during the CEI, and to discuss protocols, procedures, and other requirements adopted by the facility to mitigate the spread of COVID-19. However, approximately four days before the scheduled inspection, I was contacted by another facility that I had planned to inspect and was informed that the other facility had an active outbreak of COVID-19. Therefore, I contacted Mr. Spence to inform him that the inspection at Federal would be rescheduled.

The CEI at Federal was rescheduled for January 12, 2022. The facility was not contacted before the inspection date. Prior to the CEI at Federal on January 12, 2022, I conducted a drive-by visual inspection. I did not observe any areas of concern during the drive-by. At approximately 0800 hours, I entered the guard shack and informed the guard that I was there to conduct a CEI. The guard checked my temperature, vaccination record, and verified that I had a mask. The guard then contacted Mr. Spence and provided directions to the Administration Building. Mr. Spence met me at the door to the Administration Building and escorted me to a conference room where I conducted an entry briefing with him.

During the entry briefing, I presented my business card and EPA credential letter to Mr. Spence. I explained the scope and procedures for the CEI. I explained the facility's right to make confidentiality claims for any or all the information obtained and provided a Notice Regarding Proprietary/Confidential Business Information. I stated that at the conclusion of the CEI, he would be presented with a Confidentiality Notice (Notice) with which he could make or not make a claim of confidentiality for the facility. I also provided Mr. Spence with a copy of U. S. Federal Codes 1001 and 1002, concerning communication of false statements and documents to federal inspectors, and RCRA Section 3007, explaining EPA's inspection authority, both of which he read.

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

- RCRA Facility Access Information Sheet
- Mr. Trevor Urban's business card
- RCRA Section 3007
- U.S. Federal Codes 1001 and 1002
- Instructions for Responding to a Notice of Preliminary Findings
- Notice Regarding Proprietary/Confidential Business Information
- E-Manifest Fact Sheet: Generators
- Managing your Hazardous Waste: A Guide for Small Businesses
- U.S. EPA Small Business Resources Information Sheet
- Industry Sector Notebooks
- Environmental Compliance Assistance Centers
- Solvent-Contaminated Wipes Final Rule Summary Chart
- IDNR Excluded Solvent-Contaminated Wipes Rule: Management Practices for Wipes, Rags, and Shop Towels

- Recycling Electronics: A Guide for Businesses
- Lead-Based Paint Activities: Handling and Disposal
- Battery Recycling/Disposal
- Management of Fluorescent Lamps for Businesses
- Incompatible Chemicals
- Universal Wastes – Including Aerosol Cans
- TCLP – Toxicity Characteristic Leaching Procedure
- RCRA Online: A Quick Reference Guide
- Part 279 Requirements: Used Oil Management Standards
- EPA Region 7 Emergency Response Program
- Commercial Motor Vehicle Transportation System Security and Safety
- Security Awareness
- Chemical Facility Anti-Terrorism Standards

I reviewed the Hazardous Waste Site Info Verification Report (Verification Report) with Mr. Spence (Attachment 1). Based on this review, I deleted the D039 and D040 waste codes and added the D035 and F005 waste codes. I also deleted all the large quantity universal waste accumulator entries for batteries, lamps, and mercury containing equipment, and added small quantity handler (SQH) of universal waste and used oil generator to the types of regulated activities section of the Verification Report.

I conducted the visual inspection of the facility, accompanied by Mr. Spence. Following the visual inspection, I reviewed facility records including hazardous waste manifests with land disposal restriction (LDR) notifications, Safety Data Sheets (SDS), waste profile sheets, contingency plan, and training documentation. Facility information gathered during the CEI is documented on the Data Gathering Worksheets and Checklists (Attachment 2).

At the conclusion of the CEI, I conducted an exit briefing with Mr. Spence. During the exit briefing, I provided a Receipt for Documents and Samples, which Mr. Spence signed, acknowledging receipt (Attachment 3). I provided Mr. Spence the Notice, which he signed indicating no confidential business information had been provided (Attachment 4). I also provided Mr. Spence a Notice of Preliminary Findings (NOPF), which he signed to acknowledge receipt (Attachment 5).

Maps of the facility obtained during the CEI are included in Attachment 6, and a Google Earth aerial photograph of the facility is included as Attachment 7. The 25 photographs taken during the CEI are included in Attachment 8.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

Champion Spark Plugs began operations at the main building (Building 25) in 1957 and added a second building (Building 26) immediately south of the original facility in 1962. Federal acquired the site and operations in 1998. Federal was subsequently purchased by Tenneco in 2018. Building 25 occupies approximately 210,000 square feet under roof and Building 26

consists of a basement and three floors of approximately 200,000 square feet. Mr. Spence stated that Building 26 is primarily limited to prototype work and sillment packaging. Federal currently employs approximately 345 who work one of 10 shifts, 24 hours a day, seven days a week. Federal's primary North American Industrial Classification System (NAICS) code is 336322 (Other Motor Vehicle Electrical and Electrical Equipment Manufacturing).

Federal manufacturers and assembles ignition products (spark plugs and their components). The various production processes include steel wire extrusion, machining, welding, electroplating, assembly, product testing and packaging. Each of these production processes are performed at automated stations throughout the facility. In general, spark plug shells are extruded from steel wire and sent through chucking machines (lathes) for cutting and shaping. Sidewire assemblies are welded to the shells and threads are cut. The shells are then electroplated with zinc/trivalent chrome or nickel. Pin cell (centerwise) assemblies and plugs (terminal studs) are also extruded and shaped similarly.

Assembly involves the insertion of the pin cell into prefabricated ceramic insulator/shell assemblies. These center electrodes are sealed into the ceramic/shell assemblies with talc/sodium silicate sillment powder and tamped under extreme pressure. Alternatively, one assembly area at Federal uses a copper/carbon black sillment powder, which is then baked to form a solid seal [fired-in suppressive seal (FISS) line]. Final machining includes crimping and final shaping. Following assembly, the spark plugs are tested and packaged.

Wastes generated during manufacturing and assembly include wastewater treatment plant (WWTP) sludge, waste paint-related materials (WPRM), waste rags, barium waste, nitric acid and sodium hydroxide wastes, spent parts washer solvent, and waste paint booth filters. WWTP sludge and barium waste are considered to be hazardous waste by product and process knowledge and are transported off site for waste stabilization. The facility considers WPRM and waste rags to be hazardous waste based on product and process knowledge, and ships these waste off site for fuel blending or solvent recovery. Nitric acid and sodium hydroxide wastes are considered to be hazardous wastes based on product and process knowledge and are transported off site for neutralization. Spent parts washer solvent is considered to be nonhazardous waste based on product and process knowledge and is collected for recycling. The facility considers waste paint booth filters to be nonhazardous waste based on product and process knowledge and disposes of the waste with general trash.

Wastes generated during equipment and facility maintenance include used fluorescent and high intensity discharge (HID) lamps, used batteries, used oil, and spent aerosol cans. Used lamps and batteries are managed as universal waste according to Title 40 *Code of Federal Regulations* (40 CFR) Part 273. Used oil, generated from maintenance of equipment such as compressors and conveyors, is managed according to 40 CFR Part 279. Spent aerosol cans are punctured and drained, with residues managed as hazardous waste and the empty cans managed as scrap metal for recycling. The facility considers general trash to be nonhazardous waste.

Federal was previously inspected by an EPA contractor, Booz Allen Hamilton, on March 28-29, 2017, with the following preliminary findings:

- Failure to include F003 and F005 hazardous waste codes on a hazardous waste manifest.
- Failure to include F003 and F005 hazardous waste codes on a land disposal restriction.
- Accumulation of universal waste batteries for greater than one-year.
- Failure to accumulate universal waste lamps in a closed container.
- Failure to date or otherwise track universal waste lamps to demonstrate length of time of accumulation.
- Failure to label universal waste lamps storage containers with the words “universal waste lamps” or “waste lamps” or “used lamps”.
- Failure to mark a hazardous waste accumulation container with an accumulation start date.
- Failure to inspect a hazardous waste container accumulation area on a weekly basis.
- Failure to maintain documentation of annual RCRA training.

One preliminary finding (failure to mark a hazardous waste accumulation container with an accumulation start date) was repeated during this CEI.

2. RCRA Status

Federal is identified as a large quantity generator (LQG) of hazardous waste (generating more than 1,000 kilograms [kg] of hazardous waste per month) on the Verification Report provided by EPA (Attachment 1). During the CEI, I reviewed hazardous waste manifests generated over the last three years. Based on the manifests generated in calendar year 2021 and information provided by Mr. Spence, I concluded that the facility generates an average of approximately 18,636 pounds (8,453 kg) of WWTP sludge per month. Based on the volume of WWTP sludge alone, I concluded that Federal is currently operating as a LQG of hazardous waste. Federal is also a used oil generator and a SQH of universal waste (accumulating less than 5,000 kg of universal waste at a time).

The facility operates two less-than-90-day hazardous waste container accumulation areas (HWCAA); one located in the Storage Room of Building 26 and the other on a pad outside of the WWTP.

3. Waste Streams

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

WWTP sludge is generated from a filter press following treatment of facility wastewater. The facility has determined that WWTP sludge is hazardous waste (F006) based on product and process knowledge. Based on manifest records, the facility generates approximately 18,636 pounds (8,453 kg) of WWTP sludge per month. The waste is accumulated in a 20-cubic-yard

roll-off container on a HWCAA pad outside of the WWTP. It is collected by Keldorn Trucking and transported to Envirite of Illinois in Harvey, Illinois, for waste stabilization.

During the CEI, I observed a satellite accumulation container (SAC) at the WWTP press (Attachment 8, Photograph 24). The SAC was under control of the operator, near the point of generation, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and was empty. When the press is activated, WWTP sludge is deposited into the container and immediately taken to the 20-cubic-yard roll-off container outside the WWTP. I observed the 20-cubic-yard roll-off container during the CEI. The hazardous waste accumulation container (HWAC) was structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and dated November 11, 2021 (Attachment 8, Photograph 22).

WPRM is generated through the cleaning of the paint lines and paint gun when there is a color change. Multi-Thane 330 paint is used in the paint shop. A copy of the SDS for Multi-Thane 330 is included as Attachment 9. The facility considers WPRM to be hazardous waste (D001, F003) by product and process knowledge. WPRM is accumulated in 55-gallon satellite accumulation containers (SACs) in the paint shop, and full SACs are transported to the Storage Room HWCAA. Based on manifest records, the facility generates approximately 44 pounds (20 kg) of WPRM per month. The waste is collected by U.S. Industrial Technologies and transported to EQ Detroit, Inc. in Detroit, Michigan, for fuel blending.

During the CEI, I observed two HWACs of WPRM in the Storage Room HWCAA (Attachment 8, Photograph 17). The HWACs were structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and dated December 15, 2021, and January 9, 2022. I did not observe any SACs of WPRM during the CEI.

Waste rags are generated by wiping down the ink machines after cleaning and by general paint shop cleaning. The facility has determined that waste rags are hazardous waste (D001, D035, F003) by product and process knowledge. A copy of the SDS for Klean Strip Xylol Xylene used as a cleaning solvent in the paint shop is included as Attachment 10. Copies of the SDS for Ink-P Pad Printing Ink, B Thinner, and SI-PZ3043 Flush are included as Attachments 11 through 13, respectively. A copy of the waste profile from Tradebe Treatment is included as Attachment 14. The waste profile also includes the F005 listed hazardous waste code; however, based on my review of the solvents used, it does not appear the F005 listed hazardous waste code is applicable. Based on manifest records, the facility generates approximately 19 pounds (8.6 kg) of waste rags per month. The waste is collected by U.S. Industrial Technologies and transported to EQ Detroit, Inc. in Detroit, Michigan, for solvent recovery.

During the CEI, I observed one 55-gallon SAC of waste rags at bay location AA18 (Attachment 8, Photograph 25). The SAC was structurally sound, under control of the operator, near the point of generation, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and held approximately 10 gallons of waste rags. At bay location BB4, I observed a 55-gallon SAC of ink paint rags (Attachment 8, Photograph 3). The SAC was structurally sound, near the point of generation, under control of the operator, closed, labeled

with the words “hazardous waste” and an indication of the nature of the hazard, and held approximately 30 gallons of waste ink paint rags.

In the Paint Shop, I observed two SACs of waste paint rags. The first SAC was structurally sound, near the point of generation, under control of the operator, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and held approximately 2 gallons of waste paint rags (Attachment 8, Photograph 7). The second waste paint rags SAC was structurally sound, under the control of the operator, at the point of generation, closed labeled with an indication of the hazard, held approximately 1 gallon of waste paint rags (Attachment 8, Photographs 10 and 11). However, the SAC was not labeled with the words “hazardous waste” as required by 40 CFR 262.15(a)(5)(i) (**NOPF No. 3**). This NOPF was not included on the NOPF left at the facility. It was added on January 21, 2022, and Mr. Spence was notified of its addition by email and telephone at that time.

Used oil is generated during maintenance of facility equipment. The facility manages used oil according to 40 CFR Part 279. Based on my review of manifests and bills of lading, I estimated the facility generates approximately 30 gallons of used oil per month. Used oil is stored in two 250-gallon used oil storage containers (totes). Used oil is collected by Seneca Waste Solutions for recycling.

During the CEI, I observed two used oil totes in the Storage Room HWCAA (Attachment 8, Photographs 12 and 13). Both totes were structurally sound with no apparent leaks or damage, and both were labeled with the words “used oil.” One tote was empty and the other held approximately 200 gallons of used oil.

Barium waste consists of carbon powder spillover, air emission control dusts, and filters from the FISS line. A copy of the SDS for FISS-Suppressor Glass Seal is included as Attachment 15. The facility has determined barium waste to be hazardous waste (D005) by product and process knowledge. A copy of the waste profile for Carbon Black Powder mixed with Copper or Glass Powder is included as Attachment 16. Based on manifest records, the facility generates approximately 36 pounds (16 kg) of barium waste per month. The waste is collected by U.S. Industrial Technologies and transported to EQ Detroit, Inc. in Detroit, Michigan, for stabilization.

During the CEI, I observed a SAC of waste carbon-copper powder at bay location S4 (Attachment 8, Photograph 1). The 55-gallon SAC was structurally sound, near the point of generation, under control of the operator, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and held approximately 45 gallons of waste.

I observed four HWACs of barium waste in the Storage Room HWCAA. Two 30-gallon HWACs holding waste carbon powder were structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and dated January 6, 2022 (Attachment 8, Photograph 17). A 55-gallon HWAC holding waste carbon powder was structurally sound, closed, dated January 10, 2022, and labeled with the words “hazardous waste” (Attachment 8, Photographs 15 and 16). However, the 55-gallon HWAC was not labeled

with an indication of the nature of the hazard as required by 40 CFR 262.17(a)(5)(i)(B) (NOPF No. 1).

The fourth HWAC was a one-cubic-yard super sack container that held waste carbon filters. The HWAC was structurally sound, closed, and labeled with the words “hazardous waste” and an indication of the nature of the hazard (Attachment 8, Photograph 19). However, the HWAC was not marked with an accumulation start date as required by 40 CFR 262.17(a)(5)(i)(C) (NOPF No. 2). According to the facility’s HWCAA logbook, the HWAC began accumulating hazardous waste on January 11, 2022 (Attachment 8, Photograph 20).

I provided compliance assistance regarding labeling of HWACs. During the CEI, personnel labeled the 55-gallon HWAC with an indication of the nature of the hazard and marked the January 11, 2022, accumulation start date on the one-cubic-yard HWAC (Attachment 8, Photographs 18 and 21).

Nitric acid waste and sodium hydroxide waste are generated during the annual cleaning and servicing of the FISS machinery. The facility considers these wastes to be hazardous wastes (D002) based on product and process knowledge. Based on manifest records, the facility generates approximately 4,698 pounds (2,131 kg) of nitric acid waste and 540 pounds (245 kg) of sodium hydroxide waste per year. The wastes are accumulated in 55-gallon HWACs upon generation, and are transported by U.S. Industrial Technologies to EQ Detroit, Inc. in Detroit, Michigan, for neutralization. No nitric acid or sodium hydroxide wastes were in accumulation at the time of the CEI.

Spent parts washer solvent is generated during servicing of the parts washer used for paint gun cleaning in the paint shop (Attachment 8, Photograph 8). Crystal Clean services the parts washer two times per year. Crystal Clean 142 Mineral Spirits is used as the solvent in the parts washer. A copy of the SDS for Crystal Clean 142 Mineral Spirits is included in Attachment 17. The facility has determined the spent parts washer solvent to be nonhazardous waste by product and process knowledge. The waste is transported offsite by Crystal Clean for recycling after generation. I did not observe spent parts washer solvent in accumulation during the CEI.

Used batteries are generated through maintenance of facility equipment and are managed as universal waste according to 40 CFR Part 273. According to Mr. Spence, the facility generates approximately five used batteries per month. Used batteries are accumulated in universal waste accumulation containers and are transported off site by U.S. Industrial Technologies for recycling. During the inspection, I observed three 5-gallon universal waste batteries accumulation containers at bay location F5 in Building 26 (Attachment 8, Photograph, 4). The three 5-gallon containers were labeled with the words “universal waste batteries,” dated January 11, 2022, and were empty.

Spent aerosol cans are generated during routine maintenance activities such as painting. The facility considers spent aerosol cans to be hazardous waste by product and process knowledge. Spent aerosol cans are collected in a SAC upon generation, and are taken to the Storage Room HWCAA where they are punctured and drained. Aerosol can residue is considered to be a D001

characteristic hazardous waste and is accumulated in a SAC beneath the puncturing unit. The punctured, drained cans are considered to be scrap metal and are recycled.

During the CEI, I observed a SAC of aerosol cans at bay location B1 (Attachment 8, Photograph 23). The 55-gallon SAC was structurally sound, near the point of generation, under control of the operator, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and held approximately six spent aerosol cans. I also observed an aerosol can puncturing unit and SAC in the Storage Room HWCAA (Attachment 8, Photograph 14). The 55-gallon SAC was structurally sound, near the point of generation, under control of the operator, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and held approximately one gallon of aerosol residue.

Used lamps are generated during facility maintenance. The facility manages used lamps as universal waste according to 40 CFR Part 273. Based on shipping records, the facility generates approximately 25 used lamps per month. Used lamps are accumulated in fiberboard containers upon generation, and are collected by U.S. Industrial Technologies for recycling.

During the CEI, I observed two used lamps accumulation containers at bay location F5. Both used lamps accumulation containers were structurally sound, closed, labeled with the words “universal waste lamps,” and dated. An accumulation container for 4-foot used lamps was dated December 20, 2021, and held approximately 24 used lamps (Attachment 8, Photograph 5). An accumulation container for 8-foot used lamps was dated December 20, 2021, and held one used lamp (Attachment 8, Photograph 6).

Waste paint booth filters are generated during changeout of the filters in the paint booth. Filters are changed when unusable, and they are dry when changed. No paint or solvent is sprayed on the filters during painting or cleaning operations. The facility has determined that waste paint booth filters are nonhazardous based on product and process knowledge. The facility generates approximately 32 waste paint booth filters per year. The filters are consolidated with general trash for landfill disposal when generated. During the CEI, I observed a paint booth in the Paint Shop (Attachment 8, Photograph 9). No waste paint booth filters were observed during the CEI.

General trash consists of nonhazardous production wastes, packaging wastes, and general office-type refuse, as well as waste paint booth filters. General trash is considered nonhazardous based on product and process knowledge, and is accumulated in roll-off containers outside the facility. General trash is collected for disposal by Laveine Sanitation Service for landfilling at the Des Moines County landfill. I did not observe any deficiencies related to general trash.

4. Required Response Equipment and Hazard Management

Per 40 CFR 262.15(a)(8) and 262.17(a)(6), a LQG must operate to minimize the possibility of a fire, explosion, or spill, and must maintain emergency response equipment. During the visual inspection, I observed spill response equipment comprised of mats, absorbent materials, shovels, and brooms, as well as the presence and availability of fire extinguishers. I determined that the spill and fire response equipment was adequate for the hazardous wastes generated and accumulated at the facility.

5. Container Accumulation Areas

Federal maintains one HWCAA in the Storage Area in Building 26, and another on a pad outside of the WWTP in Building 25 (Attachment 6). According to Mr. Spence, the HWCAAs are inspected weekly, and a log is maintained. I reviewed the last three years of inspection logs during the CEI and noted no concerns on the inspections. A copy of the inspection log for December 28, 2021, is included as Attachment 18. During the CEI, I asked Mr. Spence how someone would summon emergency assistance if needed. He stated that all employees who handle hazardous waste carry two-way radios.

6. Manifests

Federal sends its hazardous waste to several facilities depending upon the waste. Federal generated manifests for 59 hazardous waste shipments from January 12, 2019, to January 12, 2022. During the CEI, I reviewed manifests and LDR notifications for five shipments for 2019, five for 2020, and five for 2021. Copies of the last four shipments for September 8, 2021, September 8, 2021, November 17, 2021, and December 7, 2021, are included as Attachment 19.

7. Preparedness and Prevention Plan

LQG facilities are required by 40 CFR 262.17(a) to meet the emergency preparedness, prevention, and procedures requirements including documented arrangements with response agencies. According to Mr. Spence, Federal is the subject of a regular inspection by the Burlington Fire Department hazardous materials team. During those inspections, he said the fire department is shown the layout of the facility, the location of the hazardous waste HWCAA, and other facility features.

During the CEI, I reviewed the facility's Contingency Plan and noted that Federal had last updated their contingency plan on February 17, 2020. Mr. Spence is listed as the emergency coordinator and all pertinent contact information and emergency evacuation procedures were included. The contingency plan appeared to meet all its requirements required by 40 CFR 262.17(a), including its Quick Reference Guide.

8. Personnel Training Requirements

Personnel training is required by LQG regulations specified in 40 CFR 262.17(a)(7) to ensure that employees are thoroughly familiar with proper waste handling procedures relevant to their responsibilities. During the CEI, I asked Mr. Spence if hazardous waste training is provided to employees. He stated that hazardous waste management training is provided to all employees who handle hazardous waste within six weeks of hiring or being assigned to a job that handles hazardous waste, and a yearly refresher is conducted each February. I asked Mr. Spence who conducts the training. He stated that he and Mr. Harold Shrum conducted the training. I asked to see the training records for himself, Mr. Shrum, and Mr. Brian Parks for the last three years. I reviewed the training records and noted no deficiencies. Copies of the training records for Messrs. Spence, Parks and Shrum for 2021 are included as Attachment 20. I reviewed the job descriptions of Messrs. Spence, Parks, and Shrum, and noted that the written job descriptions, and titles were adequate.

9. Summary of Preliminary Findings

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

- (1) Failure to indicate the nature of the hazard on a HWAC as required by 40 CFR 262.17(a)(5)(i)(B) (**NOPF No. 1**)
- (2) Failure to mark an accumulation start date on a HWAC as required by 40 CFR 262.17(a)(5)(i)(C) (**NOPF No. 2**)
- (3) Failure to label a SAC with the words “Hazardous Waste” as required by 40 CFR 262.15(a)(5)(i) (**NOPF No. 3**)

Other than items specifically noted in the narrative, I observed no additional issues. However, further review by EPA may change or add to my findings.

Clifford A. Nelles

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Nelles

Date: 2022.02.08 11:35:24 -06'00'

Date: _____

Clifford A. Nelles, Inspector
CLAENE Group

AMBER WHISNANT

Digitally signed by AMBER
WHISNANT

Date: 2022.03.09 21:08:21 -06'00'

Date: _____

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

Attachments:

1. Hazardous Waste Site Info Verification Report for Inspector (2 pages)
2. Worksheets and Checklist (28 pages)
3. Receipt for Documents and Samples (1 page)
4. Confidentiality Notice (1 page)
5. Notice of Preliminary Findings (1 page)
6. Site Maps (2 pages)
7. Google Earth Photograph of Facility (1 page)
8. Photographic Documentation (Photolog and 25 Photographs) (17 pages)
9. SDS for Multi-Thane 330 (4 pages)
10. SDS for Klean Strip Xylol Xylene (9 pages)
11. SDS for Ink-P Printing Ink (12 pages)
12. SDS for B Thinner (9 pages)
13. SDS for SI-PZ3043 Flush (8 pages)
14. Waste Profile for Paint Rags (1 page)
15. SDS for FISS-Suppressor Glass Seal (4 pages)

16. Waste Profile for Carbon Black Powder Mixed with Copper or Glass Powder (7 pages)
17. SDS for Crystal Clean 142 Mineral Spirits (7 pages)
18. Inspection Log dated December 28, 2021 (10 pages)
19. Manifests (4 pages)
20. Training Records (6 pages)

NOTICE OF PRELIMINARY FINDINGS

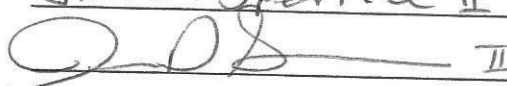
FACILITY NAME: FEDERAL-MOGUL IGNITION
ADDRESS: 3009 SYLVANIA DRIVE
BURLINGTON, IOWA 52601
EPA ID NUMBER: IAD000805143 DATE: 01/12/2022

NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for 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 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 making the determinations as to what violations may have occurred at your facility.

1. FAILURE TO INDICATE THE NATURE OF THE HAZARD ON A HAZARDOUS WASTE ACCUMULATION CONTAINER IN THE HAZARDOUS WASTE CONTAINER AREA 40 CFR 262.17 CAN
2. 40 CFR 262.17(a)(5)(i)(B)
- CAN 3.2 FAILURE TO MARK A START DATE ON A HAZARDOUS WASTE ACCUMULATION CONTAINER IN THE HAZARDOUS WASTE CONTAINER ACCUMULATION AREA 40 CFR 262.17(a)(5)(i)(C)
- X CAN 4.3 FAILURE TO LABEL A SATELLITE ACCUMULATION CONTAINER WITH THE WORD "HAZARDOUS WASTE" 40 CFR 262.15(a)(5)(i)
5. _____
6. _____
7. _____

X
ADDED BY CLIFFORD ALAN NELLES ON 01/21/2022 JIM SPENCE NOTIFIED BY EMAIL AND PHONE ON 01/21/2022
If you have any questions regarding these findings please contact TREVOR URBAN

The undersigned person hereby acknowledges receipt of a copy of this document and has read the same.

PRINTED NAME: Jim D. Spence II TITLE: EHS coordinator
SIGNATURE:  II

This document was prepared by CLIFFORD ALAN NELLES