

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At
A-Line E. D. S., Inc.
808 Dearborn Avenue
Waterloo, Iowa 50703
(319) 235-7032

EPA ID Number: IAR000503078

On

August 23, 2022

By

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

1.0 INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division, I conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at A-Line E. D. S., Inc. (A-LINE), located in Waterloo, Iowa, on August 23, 2022. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. The facility had not been inspected previously for RCRA compliance. I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. The inspection report and attachments present the results of the CEI.

2.0 PARTICIPANTS

A-LINE:

Gabe Oldfather, Environmental Health and Safety Manager, approximately eight years with the company.

Nicole Littlefield, Laboratory Manager, approximately 14 years with the company.

Jordan Palmer, Maintenance Supervisor, approximately 11 years with the company.

U.S. Environmental Protection Agency (EPA):

H. D. "Doug" Bryant, CPP, PCI, Civil Investigator, SEE, ECAD/Chemical Branch/RCRA Section

3.0 INSPECTION PROCEDURES

Prior to beginning the inspection, I conducted a visual reconnaissance of A-LINE on August 23, 2022, searching for areas of concern observable from the adjacent roadway. No environmental issues or areas of concern were observed during this preliminary examination.

I arrived unannounced at A-LINE at approximately 08:50 hours, August 23, 2022. I parked outside the facility in a large parking lot. I entered the facility and an employee welcomed me to the facility in a large entry lobby. I asked to meet with Mr. Gabe Oldfather, identified as the client contact. The employee stated that Mr. Oldfather was on a telephone call but added that he would join me at the earliest opportunity. Shortly thereafter, Mr. Oldfather joined me in the entry lobby. I briefly stated the nature of my visit and Mr. Oldfather took me to a conference area located near the lobby. This conference area was used throughout this inspection.

After exchanging pleasantries and business cards (Attachment 1), I started my entrance briefing. I presented my EPA credentials to Mr. Oldfather. I next presented Mr. Oldfather a copy of RCRA section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented him a copy of Title 18 U.S. Code, Sections 1001 and 1002. He was made aware of his confidentiality rights and was informed that a Confidentiality Notice would be provided at the end of the inspection to make or not to make any claims. Mr. Oldfather acted as the official A-LINE representative throughout this inspection.

The inspection consisted of an entry briefing, 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. Oldfather provided a site map/diagram of the facility (Attachment 2). This diagram was annotated to show the location of photos taken during the visual inspection of the facility.

Document photocopies and 15 photographs were collected as inspection documentation (Attachments 1-24). As previously mentioned, locations for each photo are documented on Attachment 2. Information collected during the CEI was recorded on a checklist and in field notes. I followed the inspection procedures discussed in the RCRA Compliance Evaluation Inspection Standard Operating Procedure (No. 2321.1C), unless noted differently.

At the conclusion of the inspection, I conducted an exit briefing, during which I summarized my findings and recommendations with Mr. Oldfather. I provided Mr. Oldfather a *Confidentiality Notice*, which he signed, indicating no confidentiality claims were made by the facility (see Attachment 3). I provided Mr. Oldfather a *Receipt of Documents and Samples* which he signed acknowledging receipt (Attachments 4). I provided Mr. Oldfather a *Notice of Preliminary Findings* which he signed acknowledging receipt (Attachment 5).

The following inspection documents and compliance assistance handouts were left with the facility:

Section 3007 Inspections Sheet (EPA Handout)

RCRA Facility Access Information Sheet (EPA Handout)

United States Code Annotated (EPA Handout)

Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections (EPA Handout)

Notice of Preliminary Findings (EPA Handout)

Instructions for Responding to a Notice of Preliminary Findings (NOPF) (Reverse of NOPF)

U.S. EPA Small Business Resource Information Sheet (EPA Handout)

Solvent-Contaminated Wipes Final Rule Chart (EPA Handout)
Excluded Solvent-Contaminated Wipe Rule (IDNR Handout)
Battery Recycling/Disposal (IDNR Handout)
Universal Wastes Including Aerosol Cans (IDNR Handout)
Environmental Compliance Assistance Centers (EPA Handout)
e-Manifest Fact Sheet (EPA Handout)
Emergency Response Program (EPA Handout)
Managing Your Hazardous Waste: A Guide for Small Business (EPA Handout)

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

A-LINE provides electrical transformer and power generating equipment recycling services to electrical utility companies located throughout the USA. A-LINE arranges for the pick-up and disposal of electrical equipment. When units are received on-site, they are cataloged, tested, and placed into an appropriate segregated staging area, based upon their RCRA HW determination. Any units that have been determined to be RCRA hazardous or have a PCB concentration greater than 50 ppm are placed into the PCB Pit (Attachment 2), designated as the HW central accumulation area (HWCAA). These units are drained of fluids and the fluids are stored in 55-gallon containers or intermediate bulk container (IBC) totes. Container contents are picked up and manifested off-site to the appropriate treatment, storage, destruction facility (TSDF). A-LINE produces refined mineral oil and metal ingots as recycled commercial products. The facility began operating in 2002 and occupies approximately 65,000-70,000 square feet under roof, housed in five buildings. A-Line employees approximately 97 personnel working two shifts (07:00-16:00, and 13:00-22:00), Monday thru Friday. The North American Industry Classification System (NAICS) code for this facility is 562219 – Other Nonhazardous Waste Treatment and Disposal.

4.2 RCRA Status

The facility Hazardous Waste Site Info Verification Report for Inspector (Attachment 6) identifies the facility as a small quantity generator (SQG) of D001 characteristic HW. I initially inspected the facility as a SQG of HW but changed the quantity to large quantity generator (LQG) of HW while preparing this report after reviewing hazardous waste shipments spanning the previous three years documented in the e-manifest system. My review revealed that A-LINE is repeatedly shipping and managing D039 characteristic and F002 listed HW, which was added to Attachment 6 during this inspection. A review of electronic manifests conducted after this CEI revealed several HW shipment discrepancies and HW shipments involving D039 characteristic HW that were sufficient to move A-LINE into a large quantity generator (LQG) of HW category. Additional documentation discrepancies are discussed in Section 4.11 below. Mr. Oldfather stated that A-LINE converted approximately 90% of all fluorescent lighting fixtures to light emitting diode (LED) lighting approximately three years ago; the few remaining fluorescent lighting fixtures are located in the maintenance shop (Attachment 2). Spent fluorescent lamps generated in the maintenance shop are managed as universal waste (UW) and are removed from the facility by a third-party vendor. Mr. Oldfather stated that A-LINE generates used oil and used oil filters. Therefore, I inspected A-LINE as a LQG of HW, a small quantify handler of UW (SQHUW), and a generator of used oil.

4.3 Facility Waste Streams and Management

A-LINE receives electrical distribution equipment from the field. Most of this equipment is filled with some type of fluid used to cool the equipment. The most common fluid used is mineral oil. A-LINE generates polychlorinated biphenyls (PCB) that are mixed with the mineral oil and conducts activities governed by 40 CFR §261.8. Cooling fluids and the electrical equipment in which the PCB are contained are separated and managed in accordance with the Toxic Substances Control Act (TSCA) regulated by 40 CFR Part 271. PCB liquid and solid wastes greater than 50 parts per million (PPM) are transported by A-LINE T.D.S., Inc. (A-LINE TDS)(EPA ID# OKD987087020) from the Waterloo A-LINE facility to the A-LINE TDS treatment, storage, disposal facility (TSDF) (EPA ID# OKD987087020), 1500 N. Main Street, Tonkawa, Oklahoma, for incineration.

Some alternative cooling liquids include silicone oil and perchloroethylene (PERC). HW management support for the waste PERC is contracted with Clean Harbors Environmental Services, Inc. (Clean Harbors), (EPA ID# MAD039322250). The HW is picked up by Clean Harbors (EPA ID# MAD039322250) and transported to the Clean Harbors Aragonite LLC facility (UTD981552177) where it is incinerated.

Laboratory wastes generated during testing are managed as D001 characteristic HW in accordance with 40 CFR Part 262 and are picked up and transported off-site by Clean Harbors to the Aragonite facility for incineration.

Parts washer solvent is picked up and replenished by Northland Products Company, Waterloo, Iowa.

Mr. Oldfather stated that A-LINE performs in-house preventive maintenance (PM) of the A-LINE truck fleet, consisting of 28 trucks and 12 materiel handlers. In-house PM activities generate used oil, used oil filters, used oil absorbents, and used fuel filters that are picked up and transported off-site by Cedar Falls Oil Company, 319 W. 7th Street, Janesville, Iowa, recently purchased by Wright Way Environmental Technologies (Wright Way), 48643 Hayes Road, Shelby Township, Michigan, for recycling.

Spent fluorescent lamps generated in the maintenance shop are picked up and transported off-site by Stickfort Electric Company, 201 E 22nd Street, Cedar Falls, Iowa. Spent fluorescent lamps are not stored on-site.

The following waste streams are managed by A-LINE:

General Trash: Mr. Oldfather stated that A-LINE generates approximately one 25-cubic yard roll-off container of general trash monthly. The general trash consists of waste office paper, lunch wastes, and miscellaneous cardboard and packing materials. Mr. Oldfather stated that the general trash has been determined to be non-RCRA hazardous, by virtue of product and process knowledge. The general trash is transported off-site by A-LINE to the Blackhawk County Sanitary Landfill, 1509 E. Washburn Road, Waterloo, Iowa, for sanitary landfill disposal.

Waste Parts Washer Solvent: Mr. Oldfather stated that A-LINE uses one 15-gallon parts washer for equipment maintenance activities, generating approximately 15 gallons of waste parts washer solvent every 12 weeks. The parts washer contains Northland NORSOLV solvent described in Attachment 7. The parts washer is routinely serviced by Northland Products Company (Northland), 1000 Rainbow Drive, Waterloo, Iowa, and the waste parts washer solvent is picked up and transported off site off-site by Northland. A waste determination for the parts washer solvent was the subject of discussion and a NOPF discussed below during the visual inspection of the facility.

Waste Aerosol Cans: Mr. Oldfather stated that A-LINE generates between one to two RCRA-empty waste aerosol cans weekly. The waste aerosol cans include glass cleaner and similar cleaning products, brake cleaner, battery cleaner, penetrating oil, and spray paint. Mr. Oldfather stated that the waste aerosol cans have been determined to be empty and non-RCRA hazardous by virtue of product and process knowledge. He stated that the RCRA-empty, non-hazardous aerosol cans are disposed in mixed scrap metal. I provided compliance assistance regarding management of waste aerosol cans that could potentially be hazardous waste as UW during my exit briefing.

Scrap Metal: Mr. Oldfather stated that A-LINE generates scrap metal and metal ingots from electrical transformer and power generating equipment recycling activities. The scrap metal is segregated by type of metal: copper, aluminum, assorted bronze, stainless steel, and mixed steel. The scrap metal is collected in small roll-off bins and consolidated in larger 25-30 cubic yard roll-off containers. The larger containers are emptied as required, averaging approximately once every week. The copper, aluminum, and assorted bronze scrap metal is transported to the Granulation Building (Attachment 2) where metal ingots are produced. The stainless steel and mixed steel scrap metal is picked up and transported off-site by Alter Metal Recycling-Waterloo (Alter), 1500 W. Airline Highway, Waterloo, Iowa, for recycling.

Spent Lead-Acid Batteries: Mr. Oldfather stated that A-LINE generates approximately one spent lead-acid battery, every three months. The spent lead-acid batteries are exchanged for replacement batteries with NAPA Auto Parts-Motor Parts and Equipment Corporation (NAPA), 2761 University Avenue, Waterloo, Iowa. Based upon Mr. Oldfather's description of these transactions, the lead-acid batteries generated within the facility are being exchanged in accordance with the provisions of the 40 CFR §266, Subpart G exemption.

Used Oil: Mr. Palmer stated that A-LINE generates approximately 250 gallons of used oil every three months from routine vehicular preventive maintenance activities. The used oil is collected in catch basins, poured into 55-gallon drums, and pumped into an approximate 250-gallon IBC tote located inside the maintenance shop (Attachment 2). Used oil is pumped out of the IBC tote and transported off-site by Wright Way for recycling.

Used Oil Filters: Mr. Palmer stated that A-LINE generates approximately one 55-gallon container of used oil filters annually. The used oil filters are gravity hot-drained and are managed as used oil. The used oil filters are picked up and transported off-site by Wright Way for recycling.

Used Oil Absorbent (Absorbents): Mr. Oldfather stated that A-LINE generates approximately one 55-gallon container of used oil absorbents annually. The 55-gallon container of

used oil absorbents is managed as used oil and is picked up and transported off-site by Wright Way for recycling.

Soiled Cloth Shop Rags: Mr. Palmer stated that A-LINE generates approximately 50 soiled cloth shop rags weekly. The cloth shop rags are used to clean truck and trailer parts, work surfaces, and operator hands. I asked Mr. Palmer if soiled cloth shop could have been contaminated with commercial products, e.g., brake cleaner, to which he responded affirmatively. This matter is discussed in more detail below during my visual inspection observations of the facility. Mr. Oldfather stated that the soiled cloth shop rags are picked up, transported off-site, and laundered by City Laundering, 5101 18th Avenue SW, Cedar Rapids, Iowa.

Process Wastewater-Rain Run-Off: Mr. Oldfather stated that A-LINE generates process wastewater when cleaning trucks and materiel handling equipment during maintenance activities. He stated that the process wastewater consists of water, detergent, dirt, sand, and road debris and is non-RCRA hazardous, by virtue of process knowledge. He added that the process wastewater is discharged to a rain water run-off pond and then to the sanitary sewer system to the Waterloo Waste Water Treatment facility, 190 University Avenue, Waterloo, Iowa. Mr. Oldfather was not aware of the volume of process wastewater generated by A-LINE.

Process Wastewater-Oil Separator: Mr. Oldfather stated that A-LINE generates process wastewater from an oil/water separator process undertaken to remove oil from process generated from cleaning transformers and power production equipment. Oil is separated from the process wastewater. The recovered oil is managed as mineral oil and sold as a product by A-LINE. The process wastewater is discharged to a second process wastewater collection pond that is connected to the Waterloo Waste Water Treatment facility. Mr. Oldfather was not aware of the volume of process wastewater generated during the oil/separator activity.

Oily Sludge: Mr. Oldfather stated that A-LINE generates oily sludge when separating mineral oil from the process wastewater generated when cleaning transformers and power generation equipment and facility floors and surfaces. The oily sludge is pumped out of the oil separator facility and transported off-site in tanker cars by Carbon Express to Kimble Sanitary Landfill, 3596 SR 39 NW, Dover, Ohio. Mr. Oldfather stated that the oily sludge is tested for PCBs by A-LINE laboratory personnel. The oily sludge has been determined to be non-RCRA hazardous, by virtue of product and process knowledge. Mr. Oldfather stated that A-LINE generates approximately one 55-gallon container of oily sludge annually to landfill or surface impoundment.

Spent Fluorescent Lamps: Mr. Oldfather stated that A-LINE generates spent fluorescent lamps in the maintenance shop. Mr. Palmer stated that the maintenance shop generates approximately one spent fluorescent lamp every three months. He added that the spent fluorescent lamps are removed and replaced by electricians working for Stickfort Electric Company, 201 E 22nd Steet, Cedar Falls, Iowa. No spent fluorescent lamps are stored on site.

Waste PCBs, Liquid: Mr. Oldfather stated that A-LINE generates between 15,000-50,000 pounds of waste liquid PCBs monthly, profiled as UN2315, PCBs Liquid. This waste stream has been determined to be non-RCRA hazardous by virtue of product, process, and regulatory knowledge. This waste stream is picked up and transported off-site by A-LINE TDS (EPA ID#

OKD987087020) to A-LINE TDS (EPA ID# OKD987087020), 1500 N. Main Street, Tonkawa, Oklahoma for chemical treatment or incineration.

Waste PCBs, Solid: Mr. Oldfather stated that A-LINE generates between 3,500-6,000 pounds of waste solid PCBs every three months, profiled as UN3432, PCBs Solid. This waste stream has been determined to be non-RCRA hazardous by virtue of product, process, and regulatory knowledge. This waste stream is picked up and transported off-site by A-LINE TDS (EPA ID# OKD987087020) to A-LINE TDS (EPA ID# OKD987087020), 1500 N. Main Street, Tonkawa, Oklahoma for incineration.

Waste Tetrachloroethylene (PERC): Mr. Oldfather stated that A-LINE generates varying amounts of waste tetrachloroethylene (PERC), ranging from approximately 1,500-7,000 pounds every three months. Mr. Oldfather stated that this quantity fluctuates, depending upon the cooling medium used for equipment being recycled. The waste tetrachloroethylene (PERC) is profiled at UN1897 and managed as D039 characteristic and F002 listed HW. This waste stream is picked up by Clean Harbors Environmental Services, Inc. (EPA ID# MAD039322250), and transported to Clean Harbors Aragonite LLC (EPA ID# UTD981552177), 11600 N. Aptus Road, Aragonite, Utah, for incineration.

Laboratory Testing Waste (Isooctane, PCBs): Mr. Oldfather stated that A-LINE generates approximately 400 pounds of laboratory testing waste (Isooctane and PCBs) annually, profiled as UN1993, waste flammable liquids (Isooctane, PCBs) managed as D001 characteristic HW. This waste stream is picked up by Clean Harbors Environmental Services, Inc. (EPA ID# MAD039322250), and transported to Clean Harbors Aragonite LLC (EPA ID# UTD981552177), 11600 N. Aptus Road, Aragonite, Utah, for incineration.

Broken Glass/Pipettes/Personal Protective Equipment (PPE): Ms. Littlefield stated that personnel working in the A-LINE laboratory generate broken glass, waste pipettes, and waste PPE. She estimated that A-Line generates less than two pounds of this waste stream weekly. The waste stream is contained in a metal step canister located inside the laboratory. This waste stream has been determined to be non-RCRA hazardous by virtue of product, process, and regulatory knowledge. Contents of the metal step can are managed as PCB waste and are picked up and transported at least monthly from the laboratory to an on-site PCB incinerator where they are incinerated.

4.4 Visual Inspection of Facility Waste Stream Management

I conducted a visual inspection of the facility with Mr. Oldfather. The visual inspection was conducted to observe waste stream management practices and document regulatory compliance. Photographs, checklists, and field notes were used to document observations made during the visual inspection. A Photo Log was created, and photos taken during the inspection appear in Attachment 8.

I observed the interior of a quality assurance laboratory housed inside the PCB Building (Attachment 2). PCB testing was performed by A-LINE laboratory personnel. I observed a “Carl Fisher” test being performed at the time of this inspection (Photo 1, Attachment 8). Waste

generated during this test is managed as D001 characteristic HW and is placed into one-gallon containers located in a laboratory hood (Photo 2, Attachment 8). I observed the three one-gallon containers used to collect the HW. I observed a pictogram that was affixed to each of the containers describing the nature of the contents of the containers. However, none of the three containers was identified as “Hazardous Waste” as required. I asked Ms. Littlefield if the one-gallon containers located in the laboratory hood contained HW, to which she responded affirmatively. **A-LINE must label containers of HW as “HAZARDOUS WASTE” in accordance with 40 CFR §262.15(a)(5)(i), (NOPF No. 2, Attachment 5).**

I asked Ms. Littlefield what happened to the HW that was collected in the one-gallon containers of HW located inside the laboratory hood. She responded that the contents of the one-gallon containers of HW located inside the laboratory hood were transported from the laboratory to the “PCB Pit” located nearby in the PCB Building (Attachment 2) and placed into a 55-gallon container of HW. After discussion, it was determined that the PCB Pit functioned as the hazardous waste central accumulation area (HWCAA) that was inspected later and discussed below.

I observed a five-gallon metal step canister located near the laboratory hood that was used to collect broken laboratory glass, used pipettes, and waste personal protective equipment (PPE), e.g., nitrile gloves worn by laboratory personnel (Photos 3 and 4, Attachment 8). Ms. Littlefield stated that the contents of the five-gallon metal step canister were managed as PCB-contaminated materiel and were incinerated on-site. Ms. Littlefield estimated that A-LINE generates less than one five-gallon container of broken laboratory glass, used pipettes, and waste PPE monthly.

I observed one closed, 55-gallon container of HW located inside the PCB Pit (HWCAA) (Photo 5, Attachment 8). According to Ms. Littlefield, the 55-gallon container was placed in the HWCAA on August 22, 2022. The 55-gallon container was used to collect the HW generated in the laboratory. I observed one label affixed to the container, identifying the contents as containing PCBs. There were no other labels. Ms. Littlefield explained that Clean Harbors added labels to containers of HW prior to picking up and shipping the containers of HW off-site. At the time of this inspection, the 55-gallon container did not accurately describe the contents as Hazardous Waste nor the nature of the container’s contents. **A-LINE must label containers of HW as “HAZARDOUS WASTE” in accordance with 40 CFR §262.17(a)(5)(i)(A), (NOPF No. 3, Attachment 5). A-LINE must also label one 55-gallon container of HW located in the HWCAA with an indication of the nature of the hazard in accordance with 40 CFR §262.17(a)(5)(i)(B), (NOPF No. 4, Attachment 5).**

I observed emergency contact information posted near the HWCAA (Photo 6, Attachment 8). The emergency contact information appeared to be current.

I observed numerous roll-off bins of scrap metal, segregated by type of metal. Typical roll-off bins are shown in Photos 7 and 8, Attachment 8. Contents of the smaller roll-off bins are transferred to a larger roll-off bin (Photo 9, Attachment 8). The large roll-off bin is moved to the granulation building (Attachment 2) where similar metals are ground and processed to produce metal ingots that are packaged and sold commercially.

I observed two containers of cloth shop rags inside the maintenance shop. One container was labeled “Clean Rags” and the other container was labeled “Used Rags” (Photo 10, Attachment 8).

The “Used Rags” container appeared to be less than 1/3-full of soiled cloth shop rags as shown in Photo 12, Attachment 8. I asked Mr. Palmer if he used commercial products on the cloth shop rags to clean parts, to which he responded affirmatively. He stated that brake cleaner products, shown in Photo 13, Attachment 8, are applied to the cloth shop rags when cleaning some parts. I asked Mr. Palmer if he had conducted a HW determination on the cloth shop rags that were contaminated with the brake cleaner products, to which he responded negatively. I asked Mr. Oldfather if A-Line had conducted a HW determination on the soiled cloth shop rags contaminated with brake cleaner product, to which he responded negatively. **A-LINE must conduct a HW determination on the soiled cloth shop rags used with commercial brake cleaner products located inside the maintenance shop in accordance with 40 CFR §262.11, (NOPF No. 1a, Attachment 5).**

I observed a small, 15-gallon parts washer located inside the maintenance shop (Photo 11, Attachment 8). Mr. Palmer stated that the parts washer was used to clean parts of trucks and materiel handling equipment during routine preventive maintenance activities. I asked Mr. Palmer if the waste parts washer solvent was RCRA hazardous, to which he responded that he did not know. I asked Mr. Oldfather if he had conducted a HW determination on the waste parts washer solvent, to which he responded negatively. **A-LINE must conduct a HW determination on the parts washer solvent used in the parts washer located inside the maintenance shop in accordance with 40 CFR §262.11, (NOPF No. 1b, Attachment 5).**

I observed at least two used oil collection basins and one 55-gallon container of used oil filters stored inside the maintenance shop (Photo 14, Attachment 8). I also observed one IBC used oil tote, approximately 1/3-full of used oil, as shown in Photo 15, Attachment 8. The used oil containers were closed and labeled with the words “Used Oil” as stipulated in 40 CFR §279.22(c)(1).

No other environmental issues or areas of concern were observed during this visual examination.

4.5 Preparedness and Prevention

Mr. Oldfather has been designated as the emergency coordinator (EC) who is on premises or on call. Mr. Curtis Land, Operations Manager, Mr. Hector Mendoza, Plant Supervisor, and Mr. Jordan Palmer, Maintenance Manager, have been designated as alternates. Mr. Oldfather stated that he is thoroughly familiar with all aspects of A-LINE’s operations. Mr. Oldfather stated that all alternate ECs are thoroughly familiar with all aspects of A-LINE’s operations and HW contingency planning and activities.

Mr. Oldfather stated that A-LINE has made arrangements and documented said arrangements with local emergency agencies and has familiarized emergency agencies with the layout of the facility, properties of hazardous waste handled at the facility, normal work locations, entrances and roads inside the facility, possible evacuation routes and typical injuries or illnesses which could result from an incident. Documentation of emergency agency notification is attached (Attachment 9).

4.6 Contingency Planning

A-LINE has a contingency plan (Attachment 10). The plan is reviewed and amended as appropriate. A copy of the plan has been submitted to emergency response agencies. The

contingency plan describes actions needed to respond to fires, explosions, or releases of hazardous wastes. The contingency plan identifies the ECs and lists emergency telephone numbers. The contingency plan lists emergency equipment, its location, and its capabilities. The plan identifies SET Environmental, Inc., 450 Sumac Road, Wheeling, Illinois, as an emergency management resource. The contingency plan provides a complete evacuation plan, including route, signal, and alternate routes. A-LINE has prepared a quick reference guide and submitted it to emergency response agencies (Attachment 11).

4.7 Personnel Training

A-LINE trains hazardous waste personnel to perform their duties in a way that ensures compliance, using a program of classroom and computer-based training. A-LINE has ensured that the instructor is trained in hazardous waste procedures. Mr. Oldfather conducts HW training for A-LINE personnel and has received specialized training in HW management, as evidenced by his most recent training certification documented by Attachment 12.

Personnel involved with HW management include the following: Environmental Health and Safety Manager, Facility Operations Manager, Lab Inventory Manager, Lead Oil QC Inspector, Granulator Lead, Inventory Logger, and Lab Technician. Members of this HW management team receive initial and refresher HW management training. HW management training includes response to emergencies, implementation of contingency plan action, use of alarms, and other emergency equipment. New employees are trained within six months of employment or assignment to their positions. Hazardous waste refresher training is conducted annually. A copy of the A-LINE training plan is attached (Attachment 13).

Specific job titles and names of persons filling positions is tracked by human resources (HR) in an electronic format. Job descriptions have been prepared by HR that describe the skills, education, or qualification, and duties associated with each job description. The following Job Descriptions of HW management personnel are attached as follows: EHS Manager (Attachment 14); Facility Operations Manager (Attachment 15); Lab Inventory Manager (Attachment 16); Lead Oil QC Inspector (Attachment 17); Granulator Lead (Attachment 18); Inventory Logger (Attachment 19); and Lab Technician (Attachment 20). Compliance assistance was provided to encourage the inclusion of HW management activities into the various job descriptions.

Documentation is maintained confirming training has been completed. Training records are attached document the most recent HW training events conducted by A-LINE (Attachments 21 and 22). Employee training records are maintained by HR and training records for former employees are maintained by HR for a minimum of three years.

4.8 Reporting and Renotification

A-LINE submitted a Biennial Report on February 10, 2022. A-LINE re notified for hazardous waste activity February 10, 2022.

4.9 Inspections

A-LINE inspects the facility for malfunctions and discharges which may lead to a release or human threat. A SAMPLE inspection checklist is attached (Attachment 23). Inspection records are retained for three years.

4.10 Required Response Equipment

A-LINE operates to minimize the possibility of a fire, explosion, or release. A-LINE provides two-way radios to personnel available for summoning emergency assistance. A-LINE provides adequate supply and proper spill equipment and an adequate water supply for fire control equipment. According to Mr. Oldfather, communication and emergency equipment is tested periodically.

4.11 Documentation

I observed discrepancies between the shipping manifests maintained by A-LINE on-site and manifests documented in the e-manifest system. Shipments of PCB from the Waterloo A-LINE E.D.S. facility to the sister A-LINE T.D.S facility (OKD987087020) were not consistent. Shipments originated at A-LINE were NOT identified as D001 characteristic HW; however, the TSDF that received the waste for destruction was reporting the waste as D001 characteristic HW and entered into the e-manifest system. Copies of the Uniform Hazardous Waste Manifests (UHW) prepared by the originator (A-LINE) are attached (Attachment 24). Mr. Oldfather stated that these discrepancies have been resolved for all PCB shipments originated at the Waterloo facility and USEPA Region 4 has been notified and is working with A-LINE T.D.S. to resolve numerous other e-manifest entries made by that facility. This matter has been corrected by A-LINE for reporting and uploading e-manifest data going forward. This correction significantly reduced the quantities of HW reported as being generated by A-LINE.

Episodic shipments of UN 1897, PERC, D039 characteristic and F002 listed HW were generated as shown below.

UHW#	Ship Date	QTY(lb)	Waste/Codes	Mgmt Method
017186709FLE	6/13/2022	1,497.20	D039, F002	HO-40 (Incin)
017029873FLE	3/23/2022	1,439.87	D039, F002	HO-40 (Incin)
017029873FLE	3/23/2022	3,281.04	D039, F002	HO-40 (Incin)
016490129FLE	1/25/2022	6,720.84	D039, F002	HO-40 (Incin)
015452943FLE	4/6/2021	6,540.03	D039, F002	HO-40 (Incin)
012873628FLE	1/31/2019	13,626.90	D039, F002	HO-40 (Incin)

5.0 SUMMARY

I documented the following preliminary findings during this CEI:

NOPF No. 1: 40 CFR §262.11(a): Conduct a HW determination on soiled cloth shop rags used with the following commercial products:

- a. Brake cleaner applied to the cloth shop rags and used to clean parts; and**
- b. Contents of the parts washer used in the maintenance shop (Attachment 5).**

NOPF No. 2: 40 CFR §262.15(a)(5)(i): Failure to label three containers of HW located inside a laboratory hood with the words “HAZARDOUS WASTE” (Attachment 5).

NOPF No. 3: 40 CFR §262.17(a)(5)(i)(A): Failure to label one 55-gallon container of HW located in the PCB Pit (HWCAA) as “HAZARDOUS WASTE” (Attachment 5).

NOPF No. 4: 40 CFR §262.17(a)(5)(i)(B): Failure to label one 55-gallon container of HW located in the PCB Pit (HWCAA) with an indication of the nature of the hazard (Attachment 5).

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

HURLEY BRYANT
(Affiliate)

Digitally signed by HURLEY
BRYANT (Affiliate)
Date: 2022.10.04 11:59:51
-05'00'

Date: 10/1/2022

H. D. "Doug" Bryant, CPP, PCI
Civil Investigator, SEE

AMBER WHISNANT

Digitally signed by
AMBER WHISNANT
Date: 2022.10.23
17:32:57 -05'00'

Date: _____

Amber Whisnant
Chief, RCRA Section, Chemical Branch
Enforcement and Compliance Assurance Division

Attachments:

- 1) Business Card (1 page)
- 2) Site Map/Diagram (1 page)
- 3) Confidentiality Notice (1 page)
- 4) Receipt of Document and Samples (1 page)
- 5) Notice of Preliminary Findings (1 page)
- 6) Hazardous Waste Site Info Verification Report for Inspector (1 page)
- 7) Safety Data Sheet (SDS), Northland NORSOLV Solvent (8 pages)
- 8) Photo log (2 pages) and Photos (15 pages)
- 9) A-LINE documentation of Emergency Agency Notification (1 page)
- 10) A-LINE Contingency Plan (120 pages)
- 11) A-LINE Emergency Quick Reference Guide (18 pages)
- 12) Training Certificate, Gabe Oldfather, HW Management (1 Page)
- 13) A-LINE HW Management Training Plan (2 pages)
- 14) Position Description (PD) Environmental Health Safety Manager (2 pages)
- 15) PD, Facility Operations Manager (2 Pages)
- 16) PD, Lab Inventory Manager (2 Pages)
- 17) PD, Lead Oil QC Inspector (2 pages)
- 18) PD, Granulator Lead (2 pages)
- 19) PD, Inventory Logger (2 pages)
- 20) PD, Lab Technician (2 Pages)
- 21) A-LINE Training Record (9/26/2022) (2 Pages)
- 22) A-LINE Training Record (9/27/2022) (2 Pages)
- 23) A-LINE SAMPLE Weekly Inspection Checklist (1 Page)
- 24) UHWM originated by A-LINE (10 Pages)