

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

CAMSO MANUFACTURING

8650 Enterprise Drive
Peosta, Iowa 52068
319-668-2031

EPA ID Number: IAR000523993

On

April 27, 2021

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 Camso Manufacturing (Camso), at 8650 Enterprise Drive in Peosta, Iowa. The CEI was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. As requested by the EPA compliance officer for the facility, 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

Camso:

Brian Crist, Environmental and Health and Safety Manager
Dustin DeMuth, Production Manager/Interim Plant Director (Exit Briefing Only).

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. Crist via telephone approximately two weeks prior to the scheduled inspection. 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.

Prior to the CEI at Camso on April 27, 2021 I conducted a drive-by visual inspection. I did not observe any areas of concern during the drive-by. Upon my arrival, I entered the visitor's entrance and was met by Mr. Crist. I introduced myself to Mr. Crist and explained the purpose of the CEI to him. Mr. Crist escorted me to a conference room where I conducted an entry briefing.

During the entry briefing, I presented my business card and EPA credential letter to Mr. Crist, I explained the scope and procedures for the CEI. I explained the facility's right to make confidentiality claims for any or all of 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. Crist 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 documents were read by Mr. Crist.

A copy of each of the following documents was left with Mr. Crist 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. Crist (Attachment 1). Based on this review, I 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. Crist. 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 Messrs. Crist and DeMuth. During the exit briefing, I provided a Receipt for Documents and Samples, which Mr. Crist signed, acknowledging receipt (Attachment 3). I provided Mr. Crist the Notice, which he signed indicating no confidential business information had been provided (Attachment 4). I also provided Mr. Crist a Notice of Preliminary Findings (NOPF), which he signed to acknowledge receipt (Attachment 5).

Maps of the facility obtained during the CEI are in Attachment 6, and a Google Earth aerial photograph of the facility is included as Attachment 7. The 22 photographs taken during the CEI are included in Attachment 8.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

Camso is a manufacturing facility dedicated to the production of undercarriages for agriculture and construction equipment. The facility was across the street at an 80,000 sq. ft. building

(Building G) until they leased the 240,000 sq. ft. building (Building H) at 8650 Enterprise Dr. in 2017 (Attachment 7). Camso currently uses both facilities for production. I asked Mr. Crist if he has an EPA ID for both facilities, he stated that when they made the move in 2017, he registered two EPA IDs for the facilities. However, Mr. Crist was contacted by the EPA and told that he only needed one EPA ID. Camso currently employs approximately 160 personnel who work one of two 8-hour shifts, 3:00 a.m. to 11:30 a.m. and 11:30 a.m. to 8:00 p.m. Monday through Friday.

During the CEI, Mr. Crist described Camso's manufacturing processes. The major raw materials used at the facility are steel castings and wheels. Steel castings are welded into the correct form for undercarriages. The undercarriages are then painted and assembled into the final product. Undercarriage work is performed in Building H. The wheels that Camso uses are manufactured at another facility and received at Camso. The facility paints these wheels in Building G.

Wastes generated during building maintenance include used lamps, which are managed as universal waste according to Title 40 *Code of Federal Regulations* (40 CFR) Part 273. Used oil is generated from maintenance of facility equipment, such as compressors and welders, and is managed according to 40 CFR Part 279. The facility considers general trash to be nonhazardous waste.

No previous RCRA inspections had occurred at Camso.

2. RCRA Status

Camso 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). Camso uses electronic (paperless) manifests. Safety-Kleen picks up all full 55-gallon Hazardous Waste Storage Containers (HWSC) approximately every month. Safety-Kleen is the transporter and the transportation, storage, and disposal (TSD) destination. Based on my review of the manifests generated in calendar year 2021 to date and the information provided by Mr. Crist, I concluded that the facility generates an average of approximately 3,163 pounds (1,438 kg) per month of Waste Paint Related Material (WPRM) from Building H, and 1,183 pounds (537 kg) of barium waste (powder coat waste) from Building G. Copies of the e-manifest report and Clean Harbors Waste Report showing quantities of these wastes shipped offsite in 2021 are in Attachments 9 and 10. Based on the volumes above, I concluded that Camso is currently operating as a LQG of hazardous waste.

Camso 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) located in the paint kitchens of Buildings G and H.

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. Crist, the visual inspection, and my review of waste shipping documents. Mr. Crist accompanied me throughout the CEI.

WPRM is generated during the cleaning of paint lines and guns during paint color changes in the paint booth in Building H. Camso has determined that the waste is hazardous (D001, D005, D006, D007, D008, D035, F003, and F005) by product and process knowledge. Copies of the Safety Data Sheets (SDS) for the primer R-CURE 200 PRIMER YELLOW AD/FD EPOXY (which is used on all painted parts) and the two most widely used finish coat paints JOHN DEERE F9H AG YELLOW URETHANE ENAMEL and JDM F9A GREEN URETHANE ENAMEL and solvent SAFETY KLEEN PREMIUM SOLVENT 150 are included as Attachments 11-14, consecutively. Based on my review of manifests, Camso generates approximately 3,163 pounds (1,438 kg) of this WPRM per month. The painters spray solvent through the paint guns into a 5-gallon Satellite Accumulation Container (SAC) in the paint booth and transfer the waste to a hazardous waste container accumulation area (HWCAA) in the Building H paint kitchen. WPRM is transported off site by Safety-Kleen Systems for fuel blending.

During the CEI, I observed a SAC in the Building H finish coat paint booth (Attachment 8, Photograph 15). The SAC was not labeled with the words “hazardous waste” as required by 40 CFR 262.15(a)(5)(i) (**NOPF No. 3**). The SAC was also not kept closed except when adding or removing waste as required by 40 CFR 262.15(a)(4) (**NOPF No. 4**). The SAC was not marked with an indication of the nature of the hazard, as required by 40 CFR 262.15(a)(5)(ii) (**NOPF No. 6**). NOPF No. 6 was added on May 03, 2021. Mr. Crist was notified by email and telephone on May 03, 2021. I provided compliance assistance regarding management of hazardous waste in SACs. During the CEI, employees of Camso closed the SAC and affixed labeling with the words “hazardous waste” and indication of the nature of the hazard via Globally Harmonized System (GHS) pictograms to the SAC in the Building H finish coat paint booth (Attachment 8, Photograph 21).

Barium waste consists of waste powder coat paint and solvent generated during the cleaning of paint lines and guns during paint color changes in the paint booth in Building G. Camso has determined that the waste is hazardous (D005) by product and process knowledge. Based on my review of manifests, Camso generates approximately 1,183 pounds (537 kg) of this waste per month. The wheels are painted in the paint booth in Building G with POWDURA SUPER DURABLE POLYESTER TGIC POWDER COATING. A copy of the SDS for POWDURA SUPER DURABLE POLYESTER TGIC POWDER COATING is included as Attachment 15. The painters spray solvent (Attachment 14) through the paint guns into a 5-gallon SAC in the paint booth and transfer the waste to a HWCAA in the Building G paint kitchen. Barium waste is collected by Safety-Kleen Systems for fuel blending.

During the CEI, I observed a SAC in the paint booth in Building G (Attachment 8, Photograph 16). The SAC was not labeled with the words “hazardous waste” as required by 40 CFR 262.15(a)(5)(i) (**NOPF No. 3**). The SAC was also not kept closed except when adding or removing waste as required by 40 CFR 262.15(a)(4) (**NOPF No. 4**). The SAC was not marked with an indication of the nature of the hazard, as required by 40 CFR 262.15(a)(5)(ii) (**NOPF No. 6**). I provided compliance assistance regarding management of hazardous waste in SACs.

During the CEI, employees of Camso closed the SAC and affixed labeling with the words “hazardous waste” and indication of the nature of the hazard via GHS pictograms to the SAC in the Building G finish coat paint booth (Attachment 8, Photograph 22).

Used oil is generated during maintenance of facility equipment such as compressors and welders. 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 25 gallons of used oil per month. Used oil is stored in a 500-gallon used oil storage tank and is collected by Cedar Falls Oil for recycling. During the inspection, I observed a 500-gallon used oil storage tank (Attachment 8, Photograph 11). The tank is labeled “Used Oil” and appears to not have any leaks or damage. The used oil is picked up by Cedar Falls Oil once a year.

Used lamps are generated during replacement of spent lamps. The facility manages all used lamps as universal waste according to 40 CFR Part 273. According to Mr. Crist, the facility generates approximately 10 used lamps per month. Used lamps are accumulated in fiberboard universal waste accumulation containers and are transported off site by Safety-Kleen for recycling.

During the CEI, I observed one 4-foot and one 8-foot fiberboard universal waste accumulation container in the storage room above the offices that held approximately 15 to 20 used lamps each (Attachment 8, Photograph 17). The universal waste accumulation containers were structurally sound, closed, labeled with the words “universal waste lamps,” and marked with an accumulation start date of December 17, 2020.

Used batteries are generated through maintenance of facility equipment and are managed as universal waste according to 40 CFR Part 273. According to Mr. Crist, the facility generates approximately one or two used batteries per month. Used batteries are accumulated in universal waste accumulation containers and are transported off site by Safety-Kleen, for recycling. During the inspection, I observed three 5-gallon universal waste batteries accumulation containers in the storage room above the offices. All three were labeled with the words “universal waste batteries” and were empty.

Spent parts washer solvent is generated during servicing of the parts washer in the Maintenance area in Building H at Bay C-11. The facility considers spent parts washer solvent to be nonhazardous waste based on product and process knowledge. A copy of the SDS for the parts washer solvent (Safety-Kleen Premium Solvent) is in Attachment 14. Approximately 30 gallons of spent parts washer solvent are generated once a year during servicing and are transported back to Safety-Kleen for recycling. During the visual inspection, I observed the parts washer in the Maintenance area (Attachment 8, Photograph 20) and noted no concerns. A copy of the e-manifest for a servicing of the parts washer on April 6, 2021 is included as Attachment 16.

Spent aerosol Cans are generated by touch up painting of the components in Building H after they are painted to cover up marks and imperfections. During the inspection, I observed a SAC for spent aerosol cans at the paint kitchen in Building H (Attachment 8, Photograph 7). The SAC was not labeled with the words “hazardous waste” as required by 40 CFR 262.15(a)(5)(i) (**NOPE**

No. 3). The SAC was also not kept closed except when adding or removing waste as required by 40 CFR 262.15(a)(4) (**NOPF No. 4).** The SAC was not marked with an indication of the nature of the hazard, as required by 40 CFR 262.15(a)(5)(ii) (**NOPF No. 6).** In the paint kitchen in Building H, I also observed a SAC for puncturing and draining spent aerosol cans (Attachment 8, Photographs 8-10). The SAC was labeled with the words “hazardous waste” and an indication of the nature of the waste; however, the SAC was not kept closed as required by 40 CFR 262.15(a)(4) (**NOPF No. 4).** I provided compliance assistance regarding management of hazardous waste in SACs. During the CEI, employees of Camso closed the SAC for puncturing and draining spent aerosol cans (Attachment 8, Photograph 18).

General trash consists of nonhazardous production wastes, packaging wastes, and general office-type refuse. General trash is considered nonhazardous and is accumulated in roll-off containers outside the facility. General trash is collected for disposal by Republic Sanitation for landfilling. 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 and absorbent materials (Attachment 8, Photograph 6). The paint kitchens in both Building G and H where the HWCAAs are located are confined areas with overhead sprinkler systems. I determined that the spill response equipment was adequate for the hazardous waste generated at the facility.

5. Container Accumulation Areas

I asked Mr. Crist if there was a telephone available or any way to summon emergency assistance. He stated that all employees of Camso carry two-way radios. Camso maintains two HWCAAs located in the paint kitchens of Buildings H and G (Attachment 6). According to Mr. Crist, 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.

During the inspection I observed three Hazardous Waste Accumulation Containers (HWAC) in the HWCAA in Building H. Two of the HWACs were labeled with the words “hazardous waste” and an indication of the nature of the waste, closed, and dated April 18, 2021 and April 22, 2021 (Attachment 8, Photographs 1-3). Mr. Crist identified the third container as a SAC for the paint booth. He stated that the 5-gallon SACs in the paint booth are closed, placed on a cart, and brought to the HWCAA to be added to a 55-gallon SAC. I stated to Mr. Crist that I viewed the third container as a HWAC as it was not under the control of the operator, near the point of generation and was having material added to it from more than one source. The third HWAC was labeled with the words “hazardous waste,” an indication of the nature of the waste, and was dated April 24, 2021 (Attachment 8, Photograph 5). However, the HWAC had an open bung in the lid (Attachment 8, Photograph 4). I determined that the HWAC was not kept closed except when adding or removing waste as required by 40 CFR 262.17(a)(2)(iv)(A) (NOPF No. 5). I provided compliance assistance regarding management of hazardous waste.

In the HWCAA in Building G, I observed one HWAC of barium waste (Attachment 8, Photographs 12-13). The HWAC was labeled with the words “hazardous waste” and an indication of the nature of the waste, closed, dated April 18, 2021, and held approximately 50 gallons of barium waste.

6. Manifests and Biennial Report

Safety-Kleen currently transports off site hazardous wastes at Camso for delivery to either Spring Grove Resource Recovery in Cincinnati, Ohio or Safety-Kleen Systems in Smithfield, Kentucky. Camso generated manifests for 87 hazardous waste shipments from April 27, 2018 to April 27, 2021. During the CEI, I reviewed manifests and LDR notifications for 15 shipments. All six shipments for 2021, three from 2020, three from 2019, and three from 2018. Copies of the e-manifests from shipments dated January 13, 2021, January 29, 2021, and February 18, 2021 are included in Attachment 9. E-manifest information for the shipments on March 11, April 6, and April 21, 2021, are included as Attachment 10. Camso filed a Biennial Report for the year 2019 and maintains a copy on site.

7. Preparedness and Prevention, and Contingency Plan

LQG facilities are required by 40 CFR 262.17(a)(6) to meet the emergency preparedness, prevention, and procedures requirements outlined in 40 CFR 262 Subpart M, including preparation of a RCRA contingency plan and documented arrangements with response agencies. According to Mr. Crist, Camso is the subject of a regular inspection by the Peosta 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 inspection, I reviewed the facility’s RCRA Contingency Plan. The primary emergency coordinator (EC) is listed as Mr. Crist. I asked Mr. Crist when the Contingency Plan was last updated. He stated that it was updated March 15, 2021. Copies of the RCRA Contingency Plan pages listing the emergency coordinators are in Attachment 17.

During the CEI, I reviewed the facility contingency plan and found that it included the following required elements:

- Descriptions of arrangements with other agencies and private response firms
- Response activities for fires, spills, and explosions
- Location and capabilities of emergency response equipment.
- Evacuation routes and signals

I asked Mr. Crist if Camso has a Quick Reference Guide as required by 40 CFR 262.17(a)(6) referencing 262.262(b). He stated that Camso had not prepared a Quick Reference Guide for the contingency plan (**NOPF No. 1**).

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. Crist if hazardous waste training is provided to employees. He said that hazardous waste management training with annual refreshers is provided to ECs and personnel who conduct weekly inspections of the HWCAA, sign manifests, and place hazardous waste into the HWCAA. Mr. Crist also stated that due to Covid-19 they were unable to train in 2020. Since Camso did not train anyone in 2020 I added the following NOPF. Failure to refresh annual hazardous waste training 40 CFR 262.17(a)(7)(iii) (**NOPF No. 7**). NOPF No. 7 was added on May 10, 2021. Mr. Crist was notified by email and telephone on May 10, 2021.

I reviewed the training records from 2018 and 2019. A copy of the training records from 2019 is included as Attachment 18. I asked Mr. Crist who conducted the training and he stated that he and Mr. John Ross conducted the training. I asked Mr. Crist for any documentation of the training that he had received. He stated that he had not received any training that was documented, only what he had received from his predecessor. Failure to provide documentation for instructor training as required by 40 CFR 262.17(a)(7)(iv)(D) (**NOPF No. 2**).

As a LQG, Camso also is required to maintain written job descriptions for hazardous waste personnel. I reviewed the job description for material handlers. According to Mr. Crist, material handlers are the personnel who collect waste from the paint booth SAC and take it to the HWCAA. I reviewed the job descriptions and did not identify any deficiencies.

9. Air Emissions: 40 CFR Part 265 Subparts AA, BB, CC

EPA regulations in 40 CFR Part 265, Subparts AA, BB, and CC apply to LQGs. If a LQG manages hazardous waste with an organic concentration greater than 10 parts per million by weight (ppmw), the standards found in Subpart AA apply to hazardous waste air emissions from certain process vents. A process vent used in distillation, fractionation, solvent extraction, thin-film evaporation, air stripping, or steam stripping is regulated by Subpart AA. Camso is not subject to the Subpart AA regulations because the facility does not have any of the process vents listed above.

If a LQG has equipment that contains or contacts hazardous waste composed of 10 percent or greater organics by weight, the facility is subject to Subpart BB standards for inspection and monitoring of the equipment. Camso is not subject to the Subpart BB regulations because it does not have equipment that contains or comes in contact with hazardous waste.

The standards found in Subpart CC apply to LQGs that manage hazardous waste in containers with volatile organic compounds (VOC) concentration that exceeds 500 ppmw. The Subpart CC standards are applicable at Camso. The facility complies with Subpart CC standards by accumulating VOC-containing hazardous waste in closed containers that comply with Department of Transportation (DOT) requirements and that have volumes less than 122 gallons.

10. Summary of Preliminary Findings

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

- (1) Failure to prepare a Quick Reference Guide for Emergency Response Agencies as required by 40 CFR 262.17(a)(6) (**NOPF No. 1**)
- (2) Failure to document hazardous waste instructors training as required by 40 CFR 262.17(a)(7)(iv)(D) (**NOPF No. 2**).
- (3) Failure to label a satellite accumulation container with the words “hazardous waste” as required by 40 CFR 262.15(a)(5)(i) (**NOPF No. 3**)
- (4) Failure to keep a satellite accumulation container closed except when adding or removing waste as required by 40 CFR 262.15(a)(4) (**NOPF No. 4**)
- (5) Failure to keep a hazardous waste accumulation container closed except when adding or removing waste as required 40 CFR 262.17(a)(1)(iv)(A) (**NOPF No. 5**)
- (6) Failure to label a satellite accumulation container with an indication of the nature of the hazard as required by 40 CFR 262.15(a)(5)(ii) (**NOPF No. 6**).
- (7) Failure to refresh annual hazardous waste training as required by 40 CFR 262.17(a)(7)(iii) (**NOPF No. 7**).

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 Digitally signed by Clifford A. Nelles
Date: 2021.06.07 10:53:44 -05'00'

Date: _____

Clifford A. Nelles, Inspector
CLAENE Group

AMBER WHISNANT Digitally signed by AMBER
WHISNANT
Date: 2021.06.17 10:43:00 -05'00'

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 (27 pages)
3. Receipt for Documents and Samples (1 page)
4. Confidentially 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 22 Photographs) (14 pages)
9. E-manifest Report (2 pages)
10. Clean Harbors Waste Report (2 pages)
11. SDS for R-CURE 200 PRIMER YELLOW AD/FD EPOXY (9 pages)
12. SDS for JOHN DEERS F9H YELLOW URETHANE ENAMEL (9 pages)
13. SDS for JDM F9A GREEN URETHANE ENAMEL (9 pages)
14. SDS for SK Premium Solvent 150 (8 pages)
15. SDS for POWDURA Super Durable Polyester TGIC Powder Coating (12 pages)
16. Clean Harbors Waste Report for Parts Washer Solvent (1 page)
17. Contingency Plan (2 pages)
18. Training Records for 2019 (6 pages)

NOTICE OF PRELIMINARY FINDINGS

FACILITY NAME: CAMS0 MANUFACTURING
ADDRESS: 8650 ENTERPRISE DR,
PEOSTA, IOWA 52068
EPA ID NUMBER: IAR000523993 DATE: 04/27/2021

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 PREPARE A QUICK REFERENCE GUIDE FOR EMERGENCY RESPONSE AGENCIES 40 CFR 262.17(a)(6) → 262.262(b)
2. FAILURE TO DOCUMENT HAZARDOUS WASTE INSTRUCTORS TRAINING 40 CFR 262.17(a)(7)(i)(B)
3. FAILURE TO LABEL A HAZARDOUS WASTE SATELLITE CONTAINER WITH THE WORDS "HAZARDOUS WASTE" 40 CFR 262.15(a)(5)(i)
4. FAILURE TO KEEP A SATELLITE CONTAINER CLOSED 40 CFR 262.15(a)(4)
5. FAILURE TO KEEP A HAZARDOUS WASTE CONTAINER CLOSED 40 CFR 262.17(a)(2)(iv)(A)
- X 6. FAILURE TO LABEL SATELLITE ACCUMULATION CONTAINERS WITH AN INDICATION OF THE NATURE OF THE HAZARD 40 CFR 262.15(a)(5)(ii)
- X 7. FAILURE TO REFRESH ANNUAL HAZARDOUS WASTE TRAINING 40 CFR 262.17(a)(7)(iii)

X
ADDED ON MAY 3, 2021 BY CLIFFORD ALAN NELLES. BRIAN CRIST NOTIFIED BY EMAIL AND PHONE ON MAY 3, 2021
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: Brian Crist TITLE: EHS Manager
SIGNATURE: 

This document was prepared by CLIFFORD ALAN NELLES

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X
NOF# 7 WAS ADDED ON MAY 10, 2021 BY CLIFFORD ALAN NELLES
BRIAN CRIST WAS NOTIFIED BY EMAIL AND TELEPHONE ON MAY 10, 2021