

MEMORANDUM

SUBJECT: Confidential Business Information - RCRA Focused Compliance Inspection at Mauser Packaging Solutions, Webster City, Iowa - Non-notifier

FROM: Dedriel Gardner
Environmental Engineer, RCRA/CB/ECAD

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THRU: Amber Whisnant
Section Chief, RCRA/CB/ECAD

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INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division (ECAD), I performed a Resource Conservation and Recovery Act (RCRA) focused compliance inspection at Mauser Packaging Solutions (Mauser) located at 503 Des Moines Street, Webster City, Iowa 50595 [phone number (515) 351-0223]. The inspection was conducted on November 15, 2021 and was conducted under the authority of RCRA Section 3007(a), as amended. During the inspection, I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. This memo and attachments present the results of the inspection. Based on the information obtained during the inspection, I inspected Mauser as a non-generator of hazardous waste (HW). However, various HW determinations need to be made that may affect this status. This facility has not been inspected by EPA for RCRA compliance.

This inspection was a focused inspection as a follow-up to the October 14, 2021 compliance evaluation inspection conducted at Industrial Container Services – Great Plains LLC (ICS-GP) located at 2001 Marvel Street, Webster City, Iowa. During the ICS-GP inspection, it was determined that this Mauser facility was interconnected to ICS-GP. Therefore, this focused inspection was scheduled to review operations and conduct a visual inspection. Please see the October 14, 2021 ICS-GP inspection report for details regarding the ICS-GP and Mauser facility operations.

The Mauser and ICS-GP participants during the inspection were as follows:

- Jeremy Smith, Plant Manager (about nine years in position and 11 years with the company)
- Jeff Widlund, Forklift Driver that was in charge at the time of my arrival, may soon become Team Lead according to Mr. Smith. (about a year with the company and in this position)

INSPECTION PROCEDURES

On November 15, 2021 about 12:50 P.M., I arrived at the facility and prior to entering the facility, I conducted a drive by from adjacent roadways. I did not note any observations of concern. I entered the east facility door and met Mr. Widlund. I introduced myself and presented my EPA credentials. I explained the purpose and procedures of the inspection. Mr. Widlund stated that he needed to contact Mr. Smith who he phoned. Mr. Smith arrived about 10 minutes later.

I introduced myself and presented my EPA credentials to Mr. Smith. I explained the purpose and procedures of the inspection. I informed him that this was a follow up to the October 14, 2021 inspection at their main 2001 Marvel Street facility to review the operations that take place at this location. I presented him with a copy of RCRA Section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented him with a copy of Title 18 U.S. Code, Sections 1001 and 1002. I made him aware of their confidentiality rights and informed him that a Confidentiality Notice would be provided at the end of the inspection to make a confidentiality claim if they so desired.

The focused inspection consisted of a discussion of facility operations, waste generation, and waste management, and a visual inspection of the facility. I conducted a visual inspection inside and outside of the facility where accessible (e.g., I did not visually inspect the tote storage areas that contained tightly packed rows of totes) including of the processing area, old wash line, and bottle and cage storage area. See Attachments 1A and 1B for facility layout. I did not review any records. Mr. Smith was present throughout the inspection.

Documents and Photographs were collected as inspection documentation (Attachments 1 through 5 and Photos 1-18). The photo log is included as Attachment 2.

At the conclusion of the inspection, I held a closing conference with Mr. Smith. I provided him with a Confidentiality Notice (Attachment 3) which he signed as acknowledgement of receipt. **A confidential business information (CBI) claim was made that stated, “any process information provided”. Mr. Smith stated this would include photos.** I summarized my findings and recommendations and provided Mr. Smith with a Notice of Preliminary Findings (NOPF), which he signed to acknowledge receipt (Attachment 4). I provided inspection documents that included the following:

- RCRA Section 3007(a)
- Title 18 U.S. Code, Sections 1001 and 1002
- Confidentiality Notice (Top page of the completed carbonless transfer set)
- Notice Regarding Proprietary/Confidential Business Information Submitted To Or Collected By EPA In Connection With Inspections Receipt for Documents and Samples
- Notice of Preliminary Findings with Instructions for Responding on back of form (Top page of the completed carbonless transfer set)

I did not provide any compliance assistance documents as they were provided to Mr. Smith during the October 14, 2021 RCRA inspection at the ICS-GP facility.

I followed the inspection procedures detailed in the RCRA CEI SOP 2321.1, unless noted otherwise.

FINDINGS AND OBSERVATIONS

General Information/Facility Operations/Wastes Management

ICS-GP refurbishes (cleans for reuse) and recycles (separates the component materials for recycling or disposal) intermediate bulk containers (IBC). An IBC is a pallet mounted container (a.k.a., bottle) that is also known as a tote. They typically consist of a 275 to 330 gallon high-density polyethylene (HDPE) bottle with a top fill lid and bottom dispensing valve encased by a steel cage on a steel/plastic pallet for support.



EXAMPLE

As stated above, ICS-GP and Mauser are interconnected. At Mauser, new plastic bottles are purchased and added into used metal cages from ICS-GP to produce IBCs that are taken to ICS-GP for sale. About two months prior to the October 14, 2021, ICS-GP inspection, the outsides of the plastic bottles were washed at Mauser, but now they are washed at ICS-GP. Therefore, please read the October 14, 2021, ICS-GP inspection report for details regarding the ICS-GP and Mauser facility operations.

Mr. Smith provided the following additional information regarding this Mauser facility (the waste streams discussed are underlined):

1. Currently, Mauser has six employees. Mauser had 12 employees when the totes were washed onsite.
2. The facility is operated 7:00 A.M. to 4:30 P.M, Monday through Friday.
3. The facility is about 65,000 square feet.
4. Mauser has been at this location for about five years.
5. Mauser purchases new plastic container bottles that are delivered directly to this facility. No used bottles are transported from the ICS-GP facility to this facility.
6. Used metal cages from the ICS-GP facility are shipped to this facility.
7. The new plastic bottles are manually placed into the metal cages. Top metal bars are added to keep the bottles in place. The metal cages may be spray painted silver if needed “once in a while”. The top bars are painted in an area just east of the old wash line by placing (hooking) them over an old cut open tote and then spraying them. The empty aerosol spray cans are determined to be non-HW and are disposed with the general trash. They are generated at a rate of about two cans per week.
8. An empty aboveground poly tank is located on the south side of the facility near the old wash line. It was planned to be used when Mauser cleaned the insides of totes. However, Mauser never started cleaning the insides of totes. Therefore, the tank has never been used.
9. During the ICS-GP inspection, Mr. Smith stated that the old wash line ceased working at the Mauser facility and was moved to the ICS-GP facility about two months prior to the October 14, 2021, ICS-GP inspection.
10. Mauser cleaned out the tray under the old wash line conveyor about one month ago. Mr. Smith stated because the employees work so quickly and had nothing else to do (see

Photos 2, 3, 5, 7, 11, 17, and 18). As a result, Mauser generated two 275-gallon totes of wash line residue, one about 3/4th full and the other about 1/4th to 1/3rd full (Photos 1, 5, 6, 8, 9, and 10). The conveyor tray was cleaned by manually shoveling out the residue into the totes. I asked Mr. Smith if this wash line residue was similar to the wash line residue generated at the ICS-GP facility (as this process was moved from Mauser to ICS-GP). He stated yes. **I listed the wash line residue on the NOPF for a HW determination to be made on this waste for the same reasons as stated in the ICS-GP inspection report. (NOPF #1a)**

11. I observed an approximately four-foot diameter white spill on the floor on the south side of the old wash line (Photos 5 and 7). Mr. Smith stated that he did not know what it was but stated that it probably happened about a month ago when they were cleaning the wash line. I asked who would know and he stated that the person who would know works the second shift and would not be at work until 4:30 P.M. **Therefore, I listed this spill on the NOPF for a HW determination to be made. (NOPF #1b)**
12. The old wash line had two low spots where the water from the line drained in the white pipelines directly to the city sewer (Photos 4, 12, 13, 14, and 15).
13. Only water was used on the old wash line process which is currently the same at ICS-GP. Mauser only washed the outsides and not the insides of totes received at the facility.
14. I observed about four visible cloth rags in the general trash (Photo 16). Mr. Smith believed that these cloth rags were generated by the maintenance person because he still works on the wash line trying to repair it. Mr. Smith stated that he said this because they do not use any rags onsite for the processes taking place. He stated that these four rags would have been generated since the wash line ceased functioning about two months prior to the October 14, 2021, ICS-GP inspection. **I listed these rags on the NOPF for a HW determination to be made. (NOPF #1c)**
15. The spent lamps are handled the same as at ICS-GP, i.e., DDW Electric Inc. (Story City, Iowa) currently changes them and takes them at the time of service.

At the ICS-GP facility Mr. Smith stated the following:

1. ICS-GP is now operating two shifts, 7:00 A.M. to 4:30 P.M. and 4:00 P.M. to 1:30 A.M.
2. ICS-GP shipped six loads of waste offsite and will have six more loads of waste shipped soon. We did not discuss the specific waste streams that were shipped.
3. ICS-GP is still waiting for sampling results to complete hazardous waste determinations.

RCRA Status

According to the EPA RCRAInfo database, Mauser had not notified as a HW generator. Currently Mauser does not manage any known HW and therefore operates as a non-generator of HW according to Mr. Smith. Based on the information obtained during the inspection, I determined that Mauser is currently a non-generator of HW. However, various HW determinations need to be made that may affect this status. I completed a RCRAInfo HW Site Info Verification Report which is included as Attachment 5.

SUMMARY OF FINDINGS

I inspected Mauser as a non-generator of HW. The following apparent findings/issues were noted as discussed above:

- **NOPF #1** – HW Determinations – *40 CFR 262.11, an accurate hazardous waste determination must be made on all solid waste.*
 - a) Wash line residue
 - b) Spill on floor
 - c) Rags in trash

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

Attachments

1. Facility Location and Layout
 - A. Aerial Photo (1 page)
 - B. Aerial Photo with Facility Layout (1 page)
2. Photo Log with an Aerial Photo with Photo Locations (10 pages / 18 Photographs)
3. Confidentiality Notice (1 page)
4. NOPF (2 pages)
5. RCRAInfo HW Site Info Verification Report (1 page)