11.

RCRA
50169

R.O.C.
From: Beth Koestner
To: Dave Whiting

2/12/88
10:00 AM

Inspection at Pries Enterprises, Independence, IA.

Inspection completed on 2/11/88.
Interim status violations cited
No hazwaste determination completed for waste in the 4000 gal accumulation tank (outside storage tank).
Facility is no longer using the process of painting on aluminum.
Painting on aluminum was done during May-July 1987 for testing purposes & again from August to December 1987 for about 16 hours per week. They had a lot of problems with the equipment. Process was shut down in ~~2/88~~ 12/87 due to equipment failure.

The extruded aluminum made at the plant is cleaned, washed & painted. The wastes go to a waste water treatment plant that treats the waste in a batch method on-site. The ~~[illegible]~~ waste is accumulated in the 4000 gal tank prior to treatment in the WWTP. ~~[illegible]~~ Currently there is 1400 gals. of waste in the tank. WWTP results in sludge that is drummed & stored (F019 waste) & wastewater that is released to the POTW.

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They also have a baking oven, & generate dry paint filters & spent thinner. The paint filters are baked in the oven & ~~to~~ disposed of in the general trash.

The exemption for WWT tanks applies to the 4000 gal tank, but a haz waste analysis has not been performed on the waste. This ~~waste~~ waste needs to be tested.

Company is in borderline financial condition. They didn't have ~~an~~ a good operator who knew how to operate the ~~treatment~~ tank system for washing, cleaning, painting the aluminum. Much ~~the~~ chromate solution was wasted.

The WWTP sludge is stored in drums. There were about 50 drums in storage. Dave saw dates on some of the drums, earliest date was 8/27/87. Dave cited 262.34 (b) for storage > 90 days. Also cited 265 subparts B, C, D, G, H, except for post-closure.

~~Caustic tank use caustic to clean dye dy~~

Caustic tank - contains used caustic from dye cleaning process. The tank is agitated. When the caustic is no longer ~~at~~ usable (spent), it is sent to the accumulation tank (4000 gal tank). The caustic could be used for pH adjustment in the WWTP.

Found 1 full drum & 1 partially full drum of material labeled methyl parathion. It was labeled by an employee who has since been laid off. (Parathion is a P-listed waste).

President of Co. resigned in 12/87.

Operating records could not be located for the WWTP.

The 50 drums of WWTP sludge are all labeled as haz waste, but some drums are not dated. Sludge is labeled as F019 due to Chromium & cyanide contents. Samples of WWTP sludge were sent to ChemWaste Mgt in Illinois. EPTox Chromium = 0.2 ppm. No cyanide is used in the Pries processes. Illinois has given CWM permission to accept the F019 waste for disposal (on 2/11 or 12/88). Pries will send all 50 drums there for disposal.

Once the 1400 gals of waste in the accumulation tank is treated in the WWTP, the company will cease generating the waste that is treated in the WWTP (parts cleaning, washing, etc) until they find someone who can get the (parts cleaning, washing) system running properly and straighten out their waste management process/procedures.

Also on NOV - 262.34 (c)(1)(ii) - Satellite accumulation container not labeled.

265.174 - no weekly inspections.

262.34(a)(2) - not all drums of haz waste were dated.

265.73 - no operating record.