102

RCRA COMPLIANCE EVALUATION INSPECTION
PRIES ENTERPRISES, INC.

INDEPENDENCE, IOWA
EPA ID NO. IAD981716806

TES IX
FINAL REPORT

PREPARED FOR:

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION VII
RCRA BRANCH, IOWA SECTION

Work Assignment No.	:	R07055
EPA Region	:	7
Date Prepared	:	August 17, 1993
Contract Number	:	68-W9-0006
Prepared By	:	Kenneth A. Lewis
Inspector	:	Kenneth A. Lewis
Telephone Number	:	(913) 338-6576
EPA Primary Contact	:	Don Lininger
Telephone Number	:	(913) 551-7724

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R00053404
RCRA Records Center

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Report is 6 pages in length

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RESOURCE CONSERVATION AND RECOVERY ACT
COMPLIANCE EVALUATION INSPECTION
AT
PRIES ENTERPRISES, INC.

FACILITY
Pries Enterprises, Inc.
1701 17th Street
Independence, Iowa 50644

INSPECTION DATE
February 27, 1992

PARTICIPANTS
Pries Enterprises, Inc.
Mr. Merle McMahon, President
Mr. Tom Kurimiski, Plant Manager

B&V Waste Science and Technology Corp.
Mr. Ken Lewis, Chemical Engineer

1.0 Introduction

PRC Environmental Management, Inc. (PRC) received Work Assignment RO7055 from the U.S. Environmental Protection Agency under contract No. 68-W9-0006 (TES 9). At the request of U.S. Environmental Protection Agency (EPA), B&V Waste Science and Technology Corp. (BVWST), under subcontract to PRC, conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at the Pries Enterprises, Inc. (Pries) facility located at 1701 Seventeenth Street in Independence, Iowa. Upon arrival at the Pries facility, BVWST met with Mr. Merle McMahon and explained the purpose of the inspection. BVWST presented Mr. McMahon with the EPA letter of credentials and designation to conduct the inspection (Appendix A). BVWST explained to Mr. McMahon the purpose and the scope of the inspection. BVWST also informed Mr. McMahon that Pries had the right to claim information gathered during the inspection as confidential business information (CBI). Mr. McMahon read the CBI Notice Form and signed it acknowledging that he had read the form (Appendix B).

2.0 Inspection Procedures

Mr. McMahon gave BVWST a brief site history and description of waste management practices at the facility. BVWST performed a visual inspection of the facility and reviewed facility files to evaluate its compliance with applicable RCRA regulations for a conditionally exempt small quantity generator. During the visual inspection, BVWST was accompanied by Mr. McMahon. During the visual inspection, BVWST took photographs of the facility (Appendix D). Mr. McMahon signed the receipt for samples and documents collected (Appendix B). The information collected by BVWST was not claimed as CBI by Pries. At the conclusion of the inspection, the findings and observations were summarized with Mr. McMahon. A Document of Receipt and a Notice of Violation (NOV) were signed by Mr. McMahon as acknowledgement of receipt, see Appendices A and B.

3.0 Facility Information

Pries manufactures extruded aluminum products. They are produced by heating seven inch aluminum billets to 900° F and then pressing them through dies using hydraulic actuated force. The extruded parts are fabricated (trimmed and cut to the proper length) and assembled for off-site shipment. Currently there are 40 employees that operate 80 hours a week in two shifts. The plant area is 55,000 square feet. See Appendix C for the facility layout.

As discussed in the previous RCRA inspection report dated May 1, 1990, Pries had in the past incorporated painting of the products. The painting process consisted of parts cleaning, painting in two dry booths and drying in an oven. The parts cleaner system consisted of a caustic (NaOH) and soap cleaner tank, two clear water rinse tanks, an electroless chrome deposition tank (chromating with chromic acid) and two clear final water rinse tanks. The wastewater generated from this parts cleaner system was treated in an on-site pretreatment unit. The wastewater pretreatment unit included an equalization tank, treatment tanks for chrome reduction, solids sedimentation and a plate and frame filter press for sludge dewatering.

The painting process was tried and determined inadequate due to design problems. Therefore, the painting operations ceased on December 22, 1987. Currently, the painting process equipment and the wastewater pretreatment equipment is empty and is for sale.

As discussed in the previous RCRA inspection report dated May 1, 1990, there was a F019 waste generated from the wastewater pretreatment process when it was being incorporated and it was stored over 90 days. This F019 waste would not be accepted by Chemical Waste Management (CWM) because the pH was too high. The waste (40 drums) was reprocessed and manifested off-site on June 17, 1988 to the CWM CID Landfill in Calumet City, IL.

After the painting operations ceased, the remaining wastewater in the parts cleaner system was processed. The additional F019 waste (43 drums) was manifested to CWM, CID Landfill, on November 4, 1988 for disposal. When this waste was manifested off-site, F019 was a soft hammer waste. A demonstration was submitted to EPA and was accepted. The waste was manifested with a certification and a notification. Mr. McMahon stated that no wastes generated from the past painting operations remain at the Pries facility.

3.1 Regulatory History

Pries submitted a Notification of Hazardous Waste Activity form on August 14, 1987 as a generator. A Consent Agreement/Consent Order (CA/CO) Docket Number VII-88-H-0034 became effective as of April 3, 1990 in regard to the storage of the F019 waste over 90 days. Pursuant to the CA/CO, Pries is required to conduct closure activities of the container storage area. At the time of this inspection, February 27, 1992, closure activities were being conducted at the storage area by Terracon Environmental, Inc. Pries is currently a conditionally exempt small quantity generator (CESQG) based on the generation rate of the parts washer spent solvent.

3.2 Waste Streams

The Pries facility generates six waste streams excluding general trash and rubbish.

Spent Mineral Spirits - There is a 30-gallon parts washer in the maintenance shop for equipment maintenance. The washer contains mineral spirits and is serviced by Northland Oil Products (Northland) (Appendix G). When Northland changes the spent solvent (D001) in the washer once every two months, it is manifested offsite (Appendix E).

Waste Oil - Waste oil is generated from the hydraulic press and from company vehicles. Waste oil from the hydraulic press is collected in a sump near the press, see Photograph No. 2 (Appendix D). Waste oil from company vehicles is collected in 55-gallon drums and placed in the sump with the hydraulic oil. Mr. Kurimiski stated that when the sump fills up the waste oil is collected by Cedar Falls Drain Service, Cedar Falls, IA (Appendix H). Mr. Kurimiski estimated that 150 gallons of waste oil is shipped offsite per month.

Waste Caustic - Caustic (NaOH) is used to clean the dies associated with fabrication. Dies are dipped into a 300-gallon tank of the caustic solution and then dipped into rinse tanks, see Photograph No. 1 (Appendix D). When the caustic becomes spent, it is pumped directly into a 2,600-gallon tank. There it is neutralized with sulfuric acid to a pH of 6 to 8 before being discharged to the sanitary sewer under a pretreatment agreement. Mr. McMahon stated that the city wastewater treatment facility initially requested Pries to notify them by telephone when a discharge occurred. However, Mr. McMahon stated that the city wastewater treatment personnel recently informed Pries that

there was no additional need to telephone them when a discharge occurred. Approximately 300 gallons of the waste caustic is neutralized every three to four weeks.

Waste Thinner - The thinner, xylene, that was noted in the previous inspection was used to clean the painting equipment. Remaining thinner still onsite from the painting operation was manifested and shipped offsite on May 8, 1990 (Appendix E). One 55-gallon drum containing 223 pounds of thinner was shipped offsite to Hydrite Chemical Company in Waterloo, IA as a listed F003 waste.

Aluminum Scrap - Aluminum scrap is generated throughout the process and from a dust collector and the trimming operations. The scrap is sent to Well Aluminum, Monnet, MO, where it is remelted into billets and returned to Pries.

Waste Cooling Water - A cooling water system is used to cool the hydraulic oil within the press. The system consists of a 400-gallon tank and several non-contact heat exchangers. The water is treated with an antimicrobial agent to inhibit microorganism growth. The antimicrobial agent is Aqua-Prep CV-413 (Appendix F). Mr. Kurimiski stated that a contractor periodically visits the facility to check the water for microorganisms content. The contractor, if necessary, adds Aqua-Prep CV-413 to the system. Approximately twice a year the spent water is flushed from the system, generating approximately 400 gallons of waste water. Mr. Kurimiski stated the waste water is discharged directly to the sanitary sewer system. Mr. Kurimiski stated that the city wastewater treatment facility is notified by telephone before the water is discharged to the sanitary sewer system.

4.0 Findings and Observations

4.1 Visual Inspection Findings

BVWST inspected the Pries facility as a conditionally exempt small quantity generator. BVWST focused on hazardous waste management practices.

BVWST inspected the machine shop where a parts washer contained approximately 30 gallons of mineral spirits. A photograph was taken of the parts washer, but it did not

develop. According to Mr. McMahon, the parts washers are serviced by Northland Oil products every two months.

BVWST inspected the waste caustic treating area at the south end of the paint room, see Photograph No. 1 (Appendix D). In this area, waste caustic from die cleaning is neutralized with sulfuric acid. The resulting neutralized solution is discharged to the sanitary sewer system under a pretreatment agreement. In the previous RCRA inspection report, it was noted that Pries had received waste caustic from the Pries facility in Waterloo, Iowa and neutralized it at the Pries facility in Independence, Iowa. Mr. McMahon stated that the Pries facility in Independence, Iowa has not received any waste caustic since the previous RCRA inspection.

BVWST inspected the unused paint equipment in the paint room. No wastes were observed in the painting equipment tanks at the time of the inspection. BVWST inspected a storage area where aluminum products are stored at the south end of the paint room prior to shipment. No wastes were observed in the storage area.

BVWST inspected the hydraulic press where waste oil is generated from the press. Mr. Kurimiski stated that waste oil is discharged directly from the press to the sump shown on Photograph No. 2 (Appendix D). Pries estimated that capacity of the sump to be approximately 720 gallons. The sump was nearly empty at the time of the inspection. At the time of the previous RCRA inspection, a 55-gallon drum of waste lube oil was noted in the old paint room. Mr. McMahon stated that the lube oil was removed from the drum and discharged to the waste oil sump to be disposed of with the hydraulic press oil.

BVWST inspected the cooling water system used to cool the hydraulic oil, see Photograph No. 3 (Appendix D). Mr. Kurimiski stated that the antimicrobial agent (Aqua-Prep CV-413) is added to the water by Pries' contractor, see Photograph No. 4 (Appendix D). Twice a year the system is flushed and the 400 gallons of water is discharged to the sanitary sewer.

4.2 Document Review Findings

BVWST inspected material safety data sheets (MSDS), manifests, and service agreements with Northland Oil Products and Cedar Falls Drain Service.

Pries furnished BVWST with photocopies of the MSDS for the antimicrobial agent and the Parco Cleaner 334 (Appendix F). During the previous RCRA inspection, a drum of waste Parco Cleaner 334 was noted in the old paint room. Mr. McMahon stated that Pries determined from the MSDS that the waste was characteristically corrosive (D002)

due to content of sodium hydroxide. Mr. McMahon stated that the contents of the drum was treated in the caustic treatment system used to neutralize the caustic die cleaning waste. The neutralized solution was then discharged to the sanitary sewer system. BVWST reviewed a hazardous waste manifest used when a 55-gallon drum of waste thinner, noted in the previous RCRA inspection, was shipped offsite to Hydrite Chemical Company in Waterloo, Iowa on May 8, 1990. Mr. McMahon stated that the waste thinner was generated from the old paining process. The manifest was properly completed and had the accompanying Land Disposal Restriction notice (Appendix E).

BVWST reviewed a receipt for waste oil collected by Cedar Falls Drain Service (Appendix H). The receipt states that the oil will be burned in an industrial furnace. However, a telephone call to Cedar Falls Drain Service determined that the waste oil is not burned at the Cedar Falls Drain Facility. Waste oil is collected by Cedar Falls Drain Service and sold to road construction companies who burn the waste oil to make asphalt. BVWST did not consider Pries to be a marketer of waste oil as defined in 40 CFR 266.

5.0 Conclusions

The Pries facility was inspected as a conditionally exempt small quantity generator facility. No violations were observed during the inspection at the Pries facility.

Appendix A

Notice of Violation and BVWST Personnel Letters of Authorization

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

RCRA Compliance Evaluation Inspections
Credentials and Designation

To Whom It May Concern:

This certifies that Kenneth A. Lewis, whose signature appears below, is designated an authorized contractor of the U.S. Environmental Protection Agency for the purpose of conducting the Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspections (CEI) for the period February 1, 1992 through December 31, 1992. This person is hereby authorized to conduct these official investigations pursuant to Section 3007 of RCRA.

Section 3007(b) of RCRA and 40 CFR Part 2 define the Agency's policies regarding protection of trade secrets and confidential information.

Age:	25
Height:	5 feet 11 inches
Weight:	160 lbs
Color of Hair:	Brown
Color of Eyes:	Green

Kenneth A. Lewis
Kenneth A. Lewis
Designated Contractor
B&V Waste Science and
Technology, Inc.

Michael J. Sanderson
Michael J. Sanderson
Chief, RCRA Branch
Waste Management Division
U.S. Environmental Protection
Agency-Region VII

RECYCLE
PAPER CONTAINS RECYCLED FIBERS

Notice of Violation Pursuant to Requirements of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: Pries Enterprises, Inc
Address: 1701 17th Street
Independence, IA 50644
EPA ID Number: IAD981716806 Date: 2-27-92

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

Citation	Description of Violation
No violations observed during the inspection	

This notice is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order (Administrative Civil Complaint) issued pursuant to Section 3008 of RCRA and may not be a complete listing of all violations which may be identified as a result of this inspection.

The Pries Enterprises is hereby requested to submit in writing within 10 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary correction actions to be taken to: Mike Sanderson, Chief, RCRA Branch, U. S. Environmental Protection Agency, Region VII, 726 Minnesota Ave., Kansas City, Kansas, 66101. The corrective actions taken by Pries Enterprises will be considered in subsequent enforcement follow-up. Should civil penalties be assessed, corrective action(s) will be considered in assessing the penalty amount.

If you have any questions on this Notice or wish to discuss your response, you may call Brian Mitchell (U. S. EPA) at 913-551-7633, or Don Lininger, (U.S. EPA), at 913-551-7724.

This Notice prepared by Kenneth Lewis Date: 2-27-92

The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: MERLE J. McMAHON Date: 2/27/92

Signature: Merle J. McMahon

Title: Pres.

7-EPA-3500.7 (Rev. 5/85)

Appendix B

Confidential Business Information Notice Form and Request for Samples Form

U.S. ENVIRONMENTAL PROTECTION AGENCY
RCRA INSPECTION
CONFIDENTIALITY NOTICE

Name and Address of Inspector(s)	Name and Address of Facility	
Kenneth Lewis, Chem Eng. ~~[illegible]~~ U.S. EPA, Region VII ENSV Division 25 Funston Road Kansas City, Kansas 66115	Pries Enterprises, Inc. 1701 17th St. Independence, IA 50644	
	Owner, Operator, or Agent in Charge MERLE J. McMAHON	
	Title PRES	
	Address 1701 17th St Independence, IA 50644	
Name of Individual to Whom Notice Given MERLE J. McMAHON	Title PRES.	Date 2/27/92

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552; EPA regualtions issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act, Section 3007, as amended. EPA is required to make inspection data available in response to FOIA requests, unless the Administrator of the Agency determines that the data contains information entitled to confidential treatment.

Any or all of the information collected by EPA during the inspection may be claimed confidential, if it relates to trade secrets or commercial of financial matters that you consider to be confidential. If you make claims of confidentiality, EPA will disclose the information only to the extent, and by the means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential information. Among other things, the regulations require that the EPA notify you in advance of publicly disclosing any information you have claimed and certified confidential.

To claim information confidential, you must certify that each claimed item meets **all** of the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. The information is not, and has not been, reasonably obtained without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding).

3. The information is not publicly available elsewhere.

4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time you may make claims that some or all of the information is confidential and meets the four criteria listed above.

RCRA INSPECTION CONFIDENTIALITY NOTICE	Facility Pries Enterprises

If you are not authorized by your company to make confidentiality claims, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials, to the Owner, Operator, or Agent in Charge of your firm, within two days of this date. That person must return a statement, specifying any information which should receive confidential treatment.

This statement from the Owner, Operator, or Agent in Charge should be addressed to:

Mr. David A. Wagoner
Director, Waste Management Division
United States Environmental Protection Agency
726 Minnesota Avenue
Kansas City, Kansas 66101

and mailed by registered, return-receipt requested mail with in seven (7) calendar days of receipt of this Notice.

Failure by your firm to submit a written request that information be treated as confidential, either at the completion of the inspection or by the Owner, Operator, or Agent in charge, within the seven-day period, will be treated by the EPA as a waiver by your company of any claims for confidentiality regarding the inspection data.

To be completed by the facility official receiving this Notice:

I have received and read this Notice.

Name MERLE J. McMAHON

Title PRES.

Signature Merle J. McMahon

Date 2/27/92

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the Owner, Operator, or Agent in charge of the company. If there is another company official who should also receive this information, please designate below:

Name _____

Title _____

Address _____

_____

U.S. ENVIRONMENTAL PROTECTION AGENCY

RECEIPT FOR SAMPLES AND DOCUMENTS

Inspector(s) Name and Address: Kenneth Lewis U.S. EPA, Region VII ENSV Division 25 Funston Road Kansas City, Kansas 66115	Firm Name and Address: Pries Enterprises, Inc 1701 17th St. Independence, Iowa 50644 Name of Individual: MERLE J. McMAHON Title: Pres.
Date Collected: 2-27-92	Samples were: ☐ PURCHASED ☐ RECEIVED NO CHARGE ☐ BORROWED
Sample Numbers:	Amount Paid for Samples:
Duplicate Samples Requested: ☐ YES ☐ NO	Method of Payment: ☐ CASH ☐ VOUCHER ☐ TO BE BILLED

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Resource Conservation and Recovery Act.

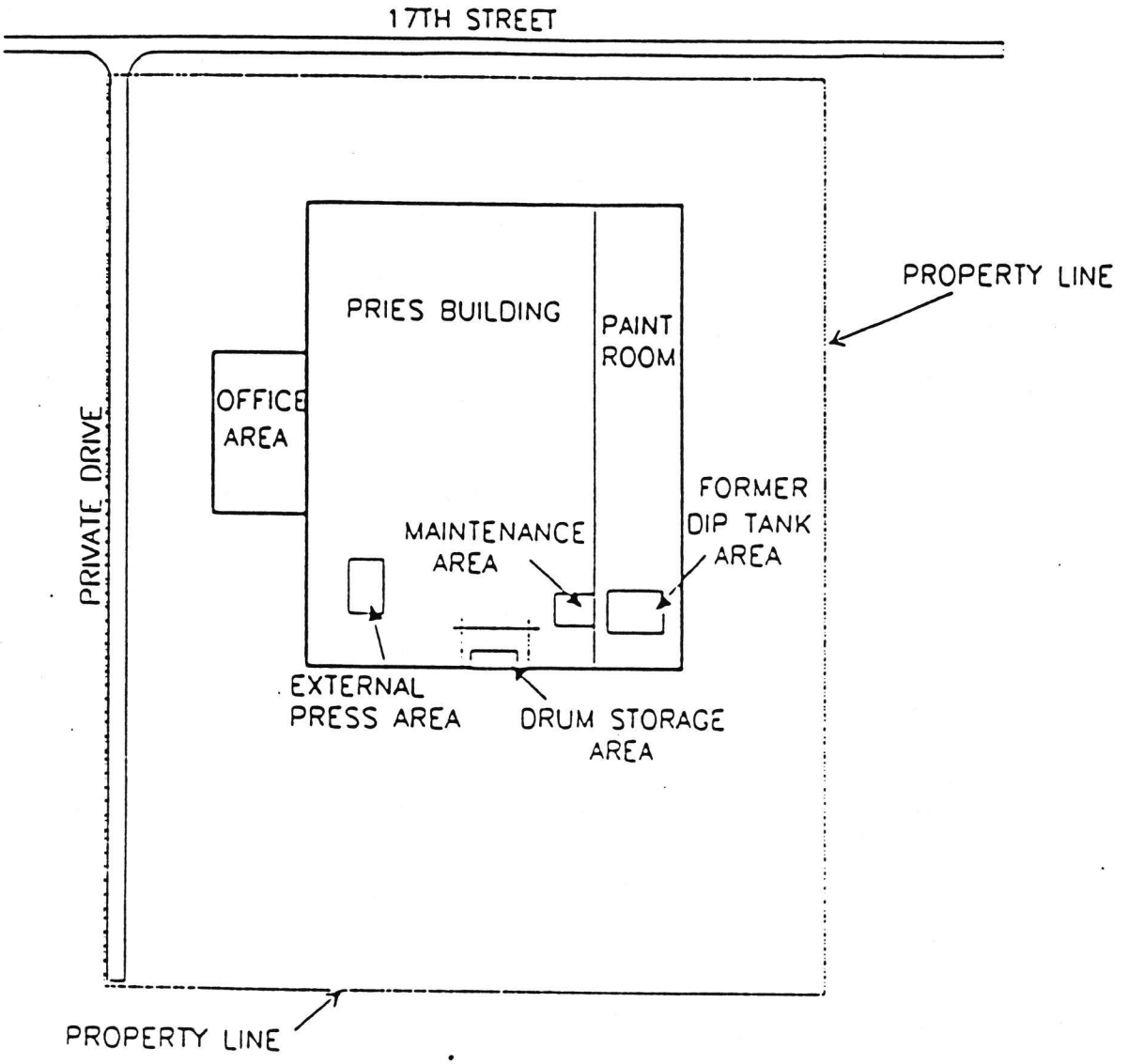
Receipt for the document(s) ~~and/or sample(s)~~ described below is hereby acknowledged:

(1) Copy of service contract w/ Northland Products Co.
(2) Copy of reciept for pick-up of used oil fuel.
(3) Copy of manifest for spent xylene
(4) Copy of manifest for spent solvent
(5) Copy of MSDS sheet for Aqua-Prep CV-413 (antimicrobial agent)
(6) Copy of MSDS sheet for Parco Cleaner 334
(7) Inspection photographs

Signature *(Owner, Operator, or Agent)*: Merle J. McMahon		Title: Pres.
Name of Inspector: Kenneth Lewis	Title: Chem Eng.	Inspector's Signature: Kenneth Lewis

Appendix C

Facility Sketch



N

APPROXIMATE SCALE

FEET 100

LEGEND

PROPERTY LINE

FIGURE 1.
SITE SKETCH
PRIES ENTERPRISES
701 17TH STREET
INDEPENDENCE, IOWA
PROJECT NO. 40905060

Appendix D

Facility Inspection Photographs

Photo No.: 1 Direction: East Photographer: Ken Lewis
Date/Time: 02/27/92-09:40 Description: Waste caustic treatment system in old paint room.

Photo No.: 2 Direction: Down Photographer: Ken Lewis
Date/Time: 02/27/92-10:00 Description: Waste oil sump near hydraulic press.

Photo No.: 3 Direction: Southwest Photographer: Ken Lewis
Date/Time: 02/27/92-10:10 Description: Cooling water system where Aqua-Prep CV-413 is added.

Photo No.: 4 Direction: South Photographer: Ken Lewis
Date/Time: 02/27/92-10:15 Description: Jug of Aqua-Prep CV-413 added to cooling water system.

Appendix E

Manifests

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. I·A·D·9·8·1·7·1·6·8·0·6
Manifest Document No. 028901
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Pries Enterprises, Inc.
701 17th Street, S.E., Indpendence, IA 50644
4. Generator's Phone (319) 334-7068

A. State Manifest Document Number 028901
B. State Generator's ID

5. Transporter 1 Company Name: Hydrite Chemical Co, Milwaukee
6. US EPA ID Number: W·I·D·0·0·6·4·3·5·8·8·7
C. State Transporter's ID
D. Transporter's Phone 414 257-2300

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
Hydrite Chemical Co.
2815 WCF & N drive
Waterloo, IA 50703
10. US EPA ID Number: I.A.T.2.0.0.0.1.0.5.9.3
G. State Facility's ID
H. Facility's Phone (319) 232-9731

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	UN 1307 Waste Xylene Mixture Flammable Liquid		0·0·1	D·M	0·0·2·2·3	P	F003
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
Authorization # 9226-G-27194

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Merle J. McMahon
Signature: Merle J. McMahon
Month 0·5 Day 0·8 Year 9·0

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: James C. Boeckman
Signature: James C. Boeckman
Month 5 Day 8 Year 90

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: MARY KAY CHRISTENSEN
Signature: Mary Kay Christensen
Month 0·5 Day 0·9 Year 90

ORIGINAL — RETURN TO GENERATOR

NOTIFICATION OF TMENT REQUIREMENTS FOR LAND DI SAL RESTRICTED WASTE STREAMS

Company Pries Enterprises, Inc. Address 701 17th St. S.E., Indpendence, IA

U.S. EPA ID # IAD981716806 Manifest # 28901

This serves as notification that the above-referenced waste stream is affected by the U.S. EPA Land Disposal Restrictions set forth in 40 CFR 268. The following indicated substances and treatment standards are those applicable to this waste stream.

U.S. EPA Waste Code Numbers

___F001 ___F002 _X_F003 ___F005

TREATMENT STANDARDS FOR SPENT SOLVENT WASTES

	F001 - F005 Spent Solvents	Waste Waters Containing Spent Solvents Concentration mg/L	All Other Spent Solvent Waters Concentration mg/L
___	Acetone	0.05	0.59
___	n-Butyl alcohol	5.0	5.0
___	Carbon disulfide	1.05	4.81
___	Carbon tetrachloride	.05	.96
___	Chlorobenzene	.15	.05
___	Cresols (and Cresylic acid)	2.82	.75
___	Cyclohexanone	.125	.75
___	1,2-Dichlorobenzene	.65	.125
___	Ethylacetate	.05	.75
___	Ethyl benzene	.05	.053
___	Ethyl ether	.05	.75
___	Isobutanol	5.0	5.0
___	Methanol	.25	.75
___	Methylene chloride	.20	.96
___	Methylene chloride (from the pharmaceutical industry)	12.7	.96
___	Methyl ethyl ketone	0.05	0.75
___	Methyl isobutyl ketone	0.05	0.33
___	Nitrobenzene	0.66	0.125
___	Pyridine	1.12	0.33
___	Tetrachloroethylene	0.079	0.05
___	Toluene	1.12	0.33
___	1,1,1-Trichloroethane	1.05	.41
___	1,2,3-Trichloro -1,2,2-trifluoroethane	1.05	0.96
___	Trichloroethylene	0.062	0.091
___	Trichlorofluoromethane	0.05	0.96
_X_	Xylene	0.05	0.15

TREATMENT STANDARDS FOR CALIFORNIA LIST CONSTITUENTS

	Constituent	Concentration** (mg/L)
___	Cyanides	1000
___	Arsenic	500
___	Cadmium	100
___	Chromium VI	500
___	Lead	500
___	Mercury	20
___	Nickel	134
___	Selenium	100
___	Thallium	130
___	Liquids with pH ≤ 2.0	---
___	Liquids with PCB's	50 ppm
___	Wastes containing HOC's*	
	- Liquid containing HOC's	1000 mg/L
	- Solid containing HOC's	1000 mg/kg

* Halogenated organic compounds

** Cyanide and metal concentrations subject to change with issuance of final regulation. See 52 FR 29992, August 12, 1987

The above information is based upon ( ) an attached waste analysis or ( ) generator knowledge of the waste stream(s).

GENERATOR INFORMATION

Signed Merle J. McMahon Printed Name Merle J. McMahon

Title President Date 5/8/90

3143406

Northland Products Compa
1000 Rainbow Drive, P.O. Box 4
Waterloo, Iowa 50704

IN EVENT OF EMERGENCY CALL:
1-800-424-9300 (24 HOURS)

Please print or type
(Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. . . . . Manifest Document No. 36389

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
HAWKEYE ALUMINUM
701 17TH STREET, S.E.
POST OFFICE BOX 777
INDEPENDENCE, IOWA 50644

4. Generator's Phone (319)3347068

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name
Northland Products Company

6. US EPA ID Number
I.A.D.0.2.2.3.6.5.4.8.0

C. State Transporter's ID

D. Transporter's Phone 319-234-5585

7. Transporter 2 Company Name

8. UA EPA ID Number
. . . . . .

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
Northland Products Company
1000 Rainbow Drive
Waterloo, Iowa 50704

10. US EPA ID Number
I.A.D.0.2.2.3.6.5.4.8.0

G. State Facility's ID

H. Facility's Phone
319-234-5585

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	Petroleum Naptha, Combustible Liquid EPA Haz Class: D001/D008 DOT ID No.: UN1255	001	DRUMS	00020	GAL.	
b.		Hazardous Waste Liquid, NOS, Contains Methylene Chloride, Xylene, ORM-E NA9189 F001/F003		PAILS		GAL.	
c.							
d.							

J. Additional Descriptions for Materials Listed Above
LAND DISPOSAL RESTRICTION NOTIFICATION: This serves as notification that the above-referenced Methylene Chloride waste stream, EPA class F001/F003, is a land disposal restricted waste as set forth by EPA regulations 40 CFR part 268. The following constituents and treatment standards apply to this waste stream; Methylene Chloride (0.96 Mg/L): Cresols and Cresylic acid (0.75 Mg/L); Ethylbenzene (0.053 Mg/L); Xylene (0.15 Mg/L); Toluene (0.33 Mg/L).
California Ban: Chromium and/or compounds; 500 Mg/L

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
A. Material hazardous due to its ignitability. Protect from ignition sources including but not limited to: Open flames, smoking, cutting & welding, hot surfaces, frictional heat and sparks. B. Material contains a low percentage of components which are corrosive. Minimum skin contact as well as good personal hygiene standards should be observed. Use in areas of adequate ventilation.

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name: HAWKEYE ALUMINUM
Signature: Jim Eldert
Month Day Year: 10/08/92

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: **Northland Products Company**
Signature: David Kraft
Month Day Year: 10/08/92

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year:

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: **Northland Products Company**
Signature: Jim Walker
Month Day Year: 10/09/92

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

RETAIN THIS DOCUMENT FOR 3 YEARS

7-BLS-C5

ORIGINAL - RETURN TO GENERATOR

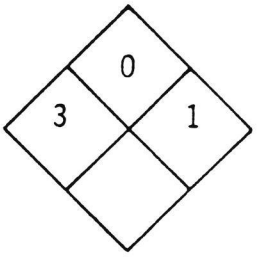
Appendix F

Material Safety Data Sheets

MATERIAL SAFETY DATA SHEET

PARKER CHEMICAL COMPANY
32100 Stephenson Hwy., Madison Heights, Michigan 48071

Date: March 21, 1983



I. PRODUCT IDENTIFICATION:

Product Name: PARCO® CLEANER 334

Code Number: 01550

Identification: Cleaning Compound - Alkaline.

II. HEALTH HAZARD DATA

Emergency and First Aid Procedures

EYES: Immediately flush eyes in a directed stream of water for at least 15 minutes while forcibly holding eyelids apart to ensure complete irrigation of all eye and lid tissue. GET MEDICAL ATTENTION.

SKIN: Immediately remove contaminated clothing and shoes. Flush skin thoroughly with water for at least 15 minutes. Rinse clothing. If irritation persists, GET MEDICAL ATTENTION.

INGESTION: Drink large quantities of water. CORROSIVE. DO NOT INDUCE VOMITING. If vomiting occurs, drink more water. GET MEDICAL ATTENTION. Never give anything by mouth to an unconscious person.

Effects of Overexposure

Contact with eyes will cause severe burn and possible blindness.

Contact with skin or mucous membrane will cause severe burn and possible ulceration.

Precautions

DO NOT GET IN EYES, ON SKIN OR ON CLOTHING.

DO NOT BREATHE DUST.

CHEMTREC EMERGENCY (800) 424-9300

Although the information presented herein is to the best of our knowledge true and accurate, no warranty or guarantee, express or implied, is made regarding the information or the performance of any product. We assume no liability for incidental, consequential or direct damages of any kind, no matter what the cause, including negligence. Nothing contained herein shall be construed as a recommendation to use a product in infringement of any existing patent, and we assume no responsibility or liability for operations which do infringe any such patents. The above includes confidential and proprietary information of Parker Chemical Company and is furnished to you for your use solely on products or processes supplied by us to you.

PRINTED IN U.S.A.

Precautions (Cont'd.)

When making additions to a cold solution, add the dry chemical, slowly, to the surface of the solution while stirring the solution to dissolve the chemical and avoid spattering.

When making additions to a hot solution, add the chemical to cold water with stirring, cool or dilute and pour slowly into the hot solution while stirring the solution.

For industrial use only.

III. HAZARDOUS INGREDIENTS

Ingredients Presenting A Significant Hazard	%	TLV	CAS
Sodium hydroxide	75	2 mg/m^3	1310-73-2
Tetrasodium pyrophosphate	2	5 mg/m^3	7722-88-5
Sodium phosphate, dibasic	2	-	7558-79-4

IV. FIRE AND EXPLOSION HAZARD DATA

Flash Point: None.

Flammable Limits: Non-flammable.

Extinguishing Media: As required to extinguish surrounding fire.

Unusual Fire and Explosion Hazard: None.

V. SPECIAL PROTECTION

Respiratory: MSHA/NIOSH dust filter mask or respirator if dusting occurs.

Ventilation: As necessary to avoid inhalation and contact.

Protective Gloves: Neoprene or Plastic.

Eye and Face Protection: Chemical goggles, face shield.

Other Protective Equipment: As required to avoid contact.

Other Protective Equipment: Eye wash facility and emergency shower should be in close proximity.

VI. PHYSICAL DATA

Solubility in water: Complete.

Appearance and Odor: White powder with mild alcoholic odor.

pH: ~13 (1% solution)

VII. REACTIVITY DATA

Stability: Stable.

Incompatibility: Keep separate from acids.

Hazardous Decomposition Products: None.

Hazardous Polymerization: Will not occur.

VIII. HANDLING AND STORAGE:

We recommend that ALL CHEMICALS be stored and used in locations which will not permit direct access to sanitary or surface drains. These areas should be constructed in such a manner that any chemicals lost can be either salvaged or suitably treated to prevent pollution.

Store drums in a ventilated area away from direct heat and separate from acids.

IX. SPILL, LEAK AND DISPOSAL PROCEDURES

Steps To Be Taken In Case Material is Released or Spilled:

Wear protective clothing; respirator.

Sweep up or otherwise collect and store in suitable drum.

Flush the contaminated area with water.

Waste Disposal Method:

This chemical does not exhibit any of the characteristics of hazardous waste as defined in Title 40 Code of Federal Regulations 261.3. However, this chemical contains a significant amount of sodium hydroxide and it is recommended that it be disposed as a hazardous waste exhibiting the characteristic of corrosivity (40 CFR 261.22).

This chemical contains phosphates and sodium hydroxide. Waste treatment and neutralization may be required prior to discharge to sewer.

Wastewater treatment sludges from electroplating (metal treating) operations are normally hazardous waste unless delisted or excepted. (40 Code of Federal Regulations 261.3)

Waste Treatment Information Bulletin: No. 1007
(Available on request).

X. REGULATORY STATUS

Clean Water Act

Toxic Pollutant List (Sec. 307): Does not contain any chemical(s)/compound(s) which are included on this list.

Designated Hazardous Substances (Sec. 311): Contains the following chemical(s)/compound(s) which are included on this list.

Sodium hydroxide and Sodium phosphate, dibasic

Reportable Quantity: 1,333 pounds.

Based on the reporting requirements for sodium hydroxide.

Department of Transportation:

This chemical is regulated by the Department of Transportation.

Proper Shipping Name: Corrosive Solid, N.O.I., UN 1759.

D.O.T. Hazardous Classification: Corrosive Material.

Department of Transportation Label: Corrosive.

Prepared By: S. Whitney

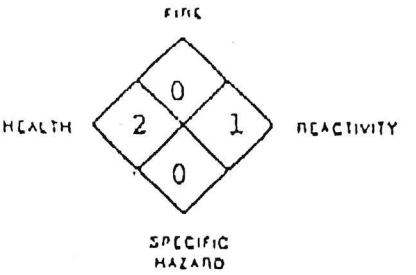
Aqua Prep

MATERIAL SAFETY DATA SHEET

CV-413

DATE 3/6/86

HAZARD RATING
4 – EXTREME
3 – HIGH
2 – MODERATE
1 – SLIGHT
0 – INSIGNIFICANT



SECTION I · PRODUCT IDENTIFICATION

MANUFACTURER: AQUA PREP, INC.	EMERGENCY TELEPHONE NO 414-338-1640
ADDRESS: Box 821 - West Bend, WI. 53095	
CHEMICAL NAMES & SYNONYMS: Nabam/Sodam	
CHEMICAL FORMULA: $Na_2(CS_2NHCH_2)_2/C_3H_7NS_2Na$	CHEMICAL FAMILY: Carbamates
DOT HAZARD CLASS: Non-Hazardous	
DOT SHIPPING NAME: NA	NA

SECTION II · HAZARDOUS INGREDIENTS

NAME	%	TLV	UNITS	CAS NO.
Disodium Ethylene Bis-dithiocarbamate	4.5	UN	UN	142-59-6
Sodium Dimethyldithio-carbamate	4.5	UN	UN	128-04-1

*MANUFACTURER STATES THAT UNIDENTIFIED INGREDIENTS ARE NOT CONSIDERED HAZARDOUS UNDER THE FEDERAL COMMUNICATION REGULATION.

NA · Not Applicable NE · Not Established UN · Unavailable

SECTION III - PHYSICAL DATA

BOILING POINT (F)	> 212°	SPECIFIC GRAVITY (H_2O=1) (25°C)	1.04
VAPOR PRESSURE (mm Hg)	UN	PERCENT VOLATILE BY VOLUME (%)	UN
VAPOR DENSITY (AIR = 1)	UN	pH	11.6
SOLUBILITY IN WATER	Complete	EVAPORATION RATE	UN

APPEARANCE AND ODOR Light amber colored liquid - Slight ammonia odor.

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT > 200°F (Pensky -Martens)		FLAMMABLE LIMITS (AIR)	UPPER NA
AUTOIGNITION TEMP. None			LOWER NA

EXTINGUISHING MEDIA NA ☐ WATER ☐ WATER FOG ☐ CO_2 ☐ DRY CHEMICAL ☐ OTHER _____

SPECIAL FIRE FIGHTING PROCEDURES	NA
UNUSUAL FIRE AND EXPLOSION HAZARD	Hydrogen sulfide and flammable by-products may be generated under extreme heat or contact with strong aicds.

SECTION V - HEALTH HAZARD INFORMATION

TLV NE

PRIMARY ROUTES OF EXPOSURE: (X) SKIN CONTACT (X) EYE CONTACT ( ) INHALATION ( ) SKIN ABSORPTION (X) INGESTION

EFFECTS OF OVEREXPOSURE:

Exact effects are unknown. Material is harmful if swallowed and may cause irritation to skin or eyes upon contact. Acute oral LD_{50} for rats on Nabam is 395 mg/kg and 1g/kg on Sodam.

NA - Not Applicable NE - Not Established UN - Unavailable

SECTION V - CON'T

EMERGENCY & FIRST AID PROCEDURES:

EYES: Wash immediately with large quantities of water. Get medical attention immediately.

SKIN: Wash thoroughly with large amounts of soap and water. Get medical attention if irritation persists.

INGESTION: If person is conscious, give water or milk to dilute. Induce vomiting. Get medical attention immediately.

INHALATION: Move to fresh air.

SECTION VI - REACTIVITY DATE

STABILITY			CONDITIONS TO AVOID
	UNSTABLE		
	STABLE	X	NA

INCOMPATABILITY (Materials to avoid)
Strong acids and strong oxidizing agents.

HAZARDOUS DECOMPOSITION PRODUCTS
Hydrogen sulfide may be produced if heated to high temperatures.
Carbon disulfide may be produced on contact with strong acids.

HAZARDOUS POLYMERIZATION			CONDITIONS TO AVOID
	MAY OCCUR		
	WILL NOT OCCUR	X	NA

NA - Not Applicable NE - Not Established UN - Unavailable

SECTION VII - SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:

Collect all material for reuse if possible.
Do not flush to open sewer or water courses.
Containerize material for approved disposal if it can not be reused.

WASTE DISPOSAL METHOD:

Material is classified as a pesticide and must be disposed of in a manner approved by EPA Resource Conservation and Recovery Act (RCRA).

NOTE: DISPOSAL OF ALL WASTE MATERIALS MUST BE ACCOMPLISHED IN ACCORDANCE WITH APPLICABLE LOCAL, STATE AND FEDERAL REGULATIONS

SECTION VIII - SPECIAL PROTECTION INFORMATION

VENTILATION REQUIREMENTS	Local exhaust is normally adequate.
RECOMMENDED PERSONAL PROTECTIVE EQUIPMENT:	No body exposure.
RESPIRATORY (SPECIFY CONDITIONS)	None
EYES	Chemical safety goggles or face shield.
GLOVES	Rubber
SPECIAL CLOTHING AND EQUIPMENT	Impervious clothing - boots.

SECTION IX - SPECIAL PRECAUTIONS

Precautions should be taken in handling and storing: Keep from freezing & store in a cool dry place away from strong acids.

Mix only with water.

Use as directed.

Avoid contamination of food or feed.

Triple rinse containers before disposal.

Appendix G

Northland Oil Products Service Agreement

Northland Products Company

No. 02076

1000 RAINBOW DRIVE
POST OFFICE BOX 418
WATERLOO, IOWA 50704
319—234-5585

SOLD TO: Pries Enterprises Inc.
Box 777, 701 17th St. S.E.
Independence, IA. 50644

SHIP TO:
phone: 319-334-7060

DATE: 12-16-88

Parts Cleaner Service Contract

QUANTITY	SIZE	CYCLE	DESCRIPTION	SERIAL NO.	PRICE
1	DM-30	8WK	PARTSWASHER	R2289	54.50
			TAX.		2.18
			Charge on Account.		$56.68
			2nd Service free		

This is a bailment and is not to be construed as a sale contract or a conditional sale contract. The intent is that Owner is hereby renting and leasing the Equipment only. It is understood and agreed the Equipment shall remain personal property at all times, notwithstanding the manner of its annexations to realty. The Lease is personal to the Lessee; no rights hereunder may be transferred without Owner's written consent.

The Equipment to this Lease includes all replacement parts, additions and accessories.

For consideration received, Northland Products Company, hereafter N.P.C., agrees to deliver to customer herein named, on or about the date described, the number and size of units so described on the service agreement. All units are to be in new condition and fully operational upon delivery. Further, N.P.C. agrees to service all units in the weekly schedule described.

Customer agrees to pay N.P.C. the price described above per unit per service. Payment is to be made at time of service or 30 days thereafter. Customer agrees to allow N.P.C. representatives resonable access to service, inspect and/or repair the units. Customer and his representatives agree to use the parts cleaners in a normal and reasonable manner and will be responsible for repairs or replacement of units physically damaged. Customer agrees to be responsible for the physical safety of the N.P.C. Parts Cleaners in his custody and agrees to reimburse N.P.C. the sum of $339.00 per unit for each unit lost or destroyed by fire, theft, vandalism, or physically damaged beyond repair.

Customer shall keep the equipment free from claims, liens, encumbrances and security interests. Customer, at its own cost, shall insure the equipment against burglary, theft, fire and vandalism in the amount of $339.00. Bailment or lease terminates upon default in payments, bankruptcy of the bailee/lessee, appointment of receivor for the business of bailee/lessee, or discontinuation of bailee's/lessee's business.

Customer may cancel this agreement at any time provided immediate notice is given to N.P.C., but in such event, customer shall pay all monies owed N.P.C. and shall immediately deliver to N.P.C. equipment previously received by it from N.P.C.

Customer agrees to assume any tax that may be assessed on use of cleaning units by any governmental agency during the term of this agreement. Customer shall indemnify and save N.P.C. harmless from any and all liabilities arising from use of cleaning units. In the event the Customer fails to make timely payments of the service charge, or this service agreement is terminated, N.P.C. will be allowed to remove all Northland Products Company Parts Cleaners from the Customer's premises without further action.

Prices subject to change without notice.

CUSTOMER AUTHORIZATION

X [signature] 12/16/88
SIGNED DATE

NORTHLAND SALESMAN APPROVAL

[signature] 12-16-88
SIGNED DATE

Appendix H

Receipt for Waste Oil

CEDAR FALLS DRAIN SERVICE

424 North Ellen
Cedar Falls, Ia.
50613
319 266-7283

Date: 1-31-92

To whom it may concern:

Today we picked up 150 gallons of drain oil from:

Preis of Independence, Ia

This oil will be used to fire Industrial Type furnaces as are used in making asphalt.

Our EPA ID Number is IAD 981496680

C R Halverson
C. R. Halverson,
Owner

Thank you

Cedar Falls Drain Oil Co.
EPA Registered

(319) 266-7283 Dick Halverson