UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

June 29, 1995

PAUL POPE
WCI LAUNDRY DIVISION
601 E CENTRAL AVE
JEFFERSON, IA 50129

RE: ID Number IAD047055140
Location: 601 E CENTRAL AVE
JEFFERSON, IA 50129

Dear Sir or Madam:

On 11/14/1994, an authorized representative of the EPA visited your facility to gather information about the impact of the 1993 flood. The purpose of this letter is to inform you of potential areas of non-compliance with the Resource Conservation and Recovery Act (RCRA) hazardous waste regulations identified from our visit. The areas in which your facility may not be in compliance with hazardous waste regulations have been indicated on the list of activities on the reverse side of this letter. Due to the fact that the visit was brief, this list may not be all inclusive, and you should evaluate all areas for hazardous waste regulation compliance.

You are not required to submit anything to the EPA at this time. However, failure to comply with hazardous waste regulations may result in an enforcement action which can include substantial penalties. These actions may be avoided if the proper steps are taken.

If you have any questions about this letter, or the hazardous waste regulations, contact our office. To help answer your questions more effectively, please refer to the following numbers:

Vehicle and transportation repair and maintenance	(913) 551-7680
Manufacturing, metal industries, machine shops, and construction	(913) 551-7556
Painting, printing, agriculture, chemicals, and other solvents	(913) 551-7699
Used oil	(913) 551-7036

If your business does not fit into one of these categories, please feel free to call any of the above numbers. After August 4th call our Iowa RCRA Hazardous Waste Helpline at (913) 551-7861.

Sincerely,

James V. Callier
Chief, RCRA Iowa Section
Air, RCRA, and Toxics Division

R00080859
RCRA Records Center

HAZARDOUS WASTE GENERATOR ACTIVITIES
Partial List of Common Violations

☐ Failure to examine each waste stream separately to determine if that waste stream is hazardous. [40 CFR 262.11]
Determination of: _____

☐ Failure to complete manifests and/or keep a copy of all manifests for three years from the date which the hazardous waste was accepted by the transporter. More specifically:

- ☐ A generator of hazardous waste must keep a copy of all manifests at the facility that generated the waste. [40 CFR 262.40(a)]
- ☐ A small quantity generator must keep a copy of the contractual agreement with the transporter. [40 CFR 262.20(e)]

☐ Failure to remove hazardous waste from the facility before the allowed accumulation time limit. A generator who does this is considered an operator of a storage facility and is subject to substantial regulation. More specifically:

- ☐ A large quantity generator can accumulate hazardous waste on site for no more than 90 days. [40 CFR 262.34 (b)]
- ☐ A small quantity generator can accumulate hazardous waste on site for no more than 180 days, or 270 days if transporting waste 200 miles or more for off-site treatment, storage, or disposal. [40 CFR 262.34 (f)]

☒ Failure to manage hazardous waste containers properly. More specifically:

- ☐ Containers must be in good condition. (Note that wastes in leaking or damaged containers must be transferred to a container in good condition. Containers must be handled properly to prevent ruptures and leaks).[40CFR265.171,265.173]
- ☒ Containers must be marked with the words "hazardous waste" and/or the date on which accumulation began. [40 CFR 262.34] (See below "other")
- ☒ Containers must be closed, except when adding or removing waste. (Note that the lid must be securely fastened with the drum bung hole closed). [40 CFR 265.173] waste Trichloro-ethane
- ☐ Containers must be made of or lined with material which will not react with the hazardous waste to be stored. [40 CFR 265.172]

☐ Failure to contain all hazardous waste discharges. [40 CFR 265.1]
Discharge of: _____

☐ Failure to obtain a disposal permit before disposal of hazardous waste. [40 CFR 265.1]
Disposal of: _____

☐ Failure to obtain a permit before treatment of hazardous waste at a facility.[40CFR 265.1]
Treatment of: _____

☒ Other: Drum must be at or near point of generation to be considered satellite accumulation area [40 CFR 262.34 (c)] If drum is not in proper compliance with this, the drum is to be marked with the date on which ~~accum~~ accumulation began.