REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

WINDSOR WINDOWS & DOORS
900 S 19th Street
West Des Moines, Iowa 50265
515-223-6660

EPA ID Number: IAD005301684

On

January 30, 2024

By

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 7
Enforcement and Compliance Assurance Division

1.0 INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division (ECAD), I conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Windsor Windows & Doors, located in West Des Moines, Iowa, on January 30, 2024. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. During the inspection, I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. This inspection report and attachments present the results of the CEI.

2.0 PARTICIPANTS

Windsor Windows & Doors:
- Phil Lumley, EHS/Safety Coordinator (3 years with company)
- Andy Holmberg, Plant Manager (3 years with company)
- Greg Willis, Paint Shop Manager (9 months with company)
- Karl Dilks, Facility Manager (4 years with company)

EPA:
- Mark Holcomb, Civil Investigator/Inspector (SEE)
- Amy Thompson, Inspector/Case Officer

3.0 INSPECTION PROCEDURES

On January 30, 2024, we arrived unannounced at the facility's main entrance at about 0900 hours. Initially, we conducted a visual reconnaissance of the facility searching for areas of concern observable from the adjacent public roadways and parking lots. I identified no

environmental issues or concerns during this preliminary examination. I entered the facility through the main entrance and was greeted at the front desk. I introduced myself and asked for the facility environmental health and safety (EHS) manager or hazardous waste contact. I was introduced to Mr. Phil Lumley, the EHS Manager. Mr. Lumley escorted us to an office/workroom area along with Mr. Andy Holmberg, Plant Manager. Mr. Lumley told us the items of personal protective equipment required for our visual inspection at this facility were protective boots, helmet, and eye protection. Mr. Lumley stated that he was the primary contact for hazardous waste at this facility.

At the opening conference, I presented my EPA ID and credentials to Mr. Lumley. I explained that my colleague, Ms. Amy Thompson, would be assisting me in a training capacity. I next explained the purpose and procedures of the inspection. I then presented Mr. Lumley 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. He was made aware of his confidentiality rights, and I informed him that a Confidentiality Notice would be provided at the end of the inspection to make a confidentiality claim if he so desired. Mr. Lumley acted as the official facility representative during the inspection.

The CEI consisted of a discussion of facility operations, waste generation, and waste management; a visual inspection of active waste generation and management areas; and a review of waste management records and documents.

I conducted a visual inspection of the following areas:

- Paint Kitchen
- PFI (Paint Line)
- Blast Room
- Fabrication
- Loading Dock
- Powder Coat Wash

See Attachment #1 for the aerial/map views and facility diagram. Document photocopies and photographs were collected as inspection documentation (see Attachments #1-13 and Photos 1-13). The photo log is included as Attachment #2. Information collected during the inspection is documented on an Entry/Exit checklist, the hazardous waste compliance checklists, and in a notebook. I reviewed documents including the following: Safety Data Sheets (SDS), manifests, invoices, emergency plan, job descriptions, and staff training. I followed the inspection procedures detailed in the RCRA CEI Standard Operating Procedure 2321.01E, unless noted otherwise.

At the conclusion of the inspection, I summarized my findings and recommendations with Mr. Lumley. I provided Mr. Lumley with a Receipt for Documents (see Attachment #3), a Confidentiality Notice (see Attachment #4), and a Notice of Preliminary Findings (NOPF) (see Attachment #6), which he signed as acknowledgement of receipt. No claim of confidential business information was made by Mr. Lumley. I provided inspection and compliance assistance documents to Mr. Lumley during the inspection, as an electronic PDF via email post-inspection, that included the following:

- *RCRA Section 3007(a) (EPA Handout)*
- *Title 18 U.S. Code, Sections 1001 and 1002 (EPA Handout)*
- *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 (EPA Handout)*
- *Receipt for Documents and Samples (Top page of the completed carbonless transfer set)*
- *NOPF with Instructions for Responding on back of form (top page of the completed carbonless transfer set)*
- *Instructions for Responding to a NOPF (EPA Handout)*
- *U.S. EPA Small Business Resource Information Sheet (EPA Handout)*
- *Solvent-Contaminated Wipes Final Rule Chart (EPA Handout)*
- *Recycling Electronics (Iowa Department of Natural Resources - IDNR Handout)*
- *Lead-Based Paint Activities (IDNR Handout)*
- *Excluded Solvent-Contaminated Wipe Rule (IDNR Handout)*
- *Battery Recycling/Disposal (IDNR Handout)*
- *Management of Fluorescent Lamps for Businesses (IDNR Handout)*
- *Incompatible Chemicals (IDNR Handout)*
- *Universal Wastes Including Aerosol Cans (IDNR Handout)*
- *TCLP Waste Determination Testing (IDNR Handout)*
- *Industry Sector Notebooks (EPA Handout)*
- *Environmental Compliance Assistance Centers (EPA Handout)*
- *e-Manifest Fact Sheet (EPA Handout)*
- *RCRA Online A Quick Reference Guide (EPA Handout)*
- *Requirements for Used Oil Management Standards (EPA Handout)*
- *Emergency Response Program (EPA Handout)*
- *Commercial Motor Vehicle Transportation System Security & Safety*
- *Security Awareness (EPA Handout)*
- *Chemical Facility Anti-Terrorism Standards (Homeland Security Handout)*
- *Iowa Life/Changing Iowa Department of Economic Development – Iowa Environmental Guide for Business*
- *How to Register for RCRAInfo Industry Application for Iowa Facilities*
- *Episodic event processing*

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

Windsor Windows & Doors is a manufacturer of custom designed windows and doors used in the construction industries. The facility is privately owned by their parent company, Woodgrain, located in Fruitland, Idaho and they have a sister Windsor facility located nearby (about 10 miles south) in Norwalk, Iowa. This facility has been in operation for at least 30 years. They estimate that they construct about 1500 units (windows and doors) per week. This facility has 350 employees working three shifts and is 24/7 in some areas. The paint line is typically one shift working 0600-1430 hours. The facility has two buildings with the primary

manufacturing plant (Building #1) is about 350,000 square feet. Building #2, next-door, is about 100,000 square feet. Mr. Lumley stated that no hazardous waste is generated in Building #2. He stated that the facility had no hazardous waste spills or significant activations of their emergency plan in the last several years. He also stated that the facility did report a small fire involving a malfunction of an industrial burn-off oven that was apparently limited to the small ten-foot by six-foot oven, on January 18, 2024. See Attachment #1 for the facility aerial map views and facility diagram.

4.2 RCRA Status

Windsor Windows & Doors had not been previously inspected for RCRA compliance. According to RCRAInfo, Windsor Windows & Doors had most recently notified as a Non-Generator on August 25, 1994. I verified the facility address and the site contact information with Mr. Lumley and updated the EPA RCRA Notification Acknowledgement Verification Report (see Attachment #5) to indicate the primary contact's name and phone numbers. Based on the review of the past three years' uniform hazardous waste manifests, I determined that Windsor Windows & Doors routinely generates D001, D005, D006, D007, D008, D035, F003 and F005 hazardous waste at the small quantity generator (SQG) level (an estimate of 615 pounds to 1,935 pounds per month). The facility had not provided SQG renotification (initially due by September 1, 2021) per 40 CFR 262.18(d)(1). During the month of August 2023, Windsor Windows & Doors shipped 6,212 pounds of hazardous waste. Mr. Lumley stated that the one-time generation event of 6,212 pounds of hazardous waste in August 2023, was due to a change in paint types. Windsor Windows & Doors did not notify the EPA at least 30 days prior to initiating the planned episodic event. Therefore, Windsor Windows & Doors had to meet the large quantity generator (LQG) requirements for the month of August 2023. Prior to the inspection, the facility had not submitted a biennial report for operation as a LQG in August 2023. At the time of the inspection, I inspected the facility as a SQG with greater than 100 kg, or 220 pounds, and less than 1000 kg, or 2200 lbs, of non-acute hazardous waste generated per month. I also inspected the facility as a small quantity handler of universal waste lamps and a generator of used oil.

- **NOPF 1a: Failure to provide SQG renotification as required in 40 CFR 262.18(d)(1)**

- **NOPF 1b: Failure to submit a Biennial Report as required in 40 CFR 262.41** *[Note: required during LQG status in August 2023]*

4.3 Facility Waste Streams and Management

Mr. Lumley stated that the following waste streams are managed by Windsor Windows & Doors:

Waste Paint and Related Materials - Windsor Windows & Doors generates waste paint and solvents in their Paint Booth during the manufacturing painting process. This waste had been determined to be D001, D005, D006, D007, D008, D035, F003 and F005 hazardous waste based on process and product knowledge (see Attachments #8 and #9 for SDS of the white paint and Barsol solvents). The SDS I reviewed did not appear to include D005 (Barium), D006

(Cadmium), D007 (Chromium), or D008 (Lead) in their ingredient lists. Mr. Lumley stated that they have been using the same waste codes (generated by Safety-Kleen) for many years and planned to reevaluate these. Mr. Lumley estimate that they generate about 1,500 pounds of this waste each month (see Attachment #7 for the uniform hazardous waste manifests and Attachments #8 and #9 for SDS of sample commonly used paints and solvents). Greg Willis, Paint Shop Manager, stated that the waste paint and solvent are initially collected in five-gallon containers in the Paint Kitchen (see Photos 1-3). These five-gallon containers are transferred to a 55-gallon black steel drum on the other side (southeast side) of the Paint Line Room (see Photo #6). The facility manages the drum as a satellite accumulation (SAA) container. Due to hazardous waste being generated from a different SAA, I determined the 55-gallon drum to be a hazardous waste storage container (less than 180-day hazardous waste accumulation container). This drum is located near to the door to the Blast Room, which functions as their container accumulation area (CAA). Mr. Lumley stated that their rational for this is that they want to reduce the traffic entering and exiting the more controlled Blast Room CAA area. Mr. Lumley stated that the smaller five-gallon SAA containers of waste paint and solvent in the Paint Kitchen may be transferred to the larger 55-gallon drum several times per day, so they keep this drum located outside of the Blast Room CAA. He stated that it only takes about one to two weeks to fill this 55-gallon drum and it is then moved into the Blast Room CAA and dated. The 55-gallon CAA drum was not marked with the accumulation start date or the nature of the hazard. This waste stream is collected on average about every two to three weeks by Safety Kleen Systems and transported to Safety Kleen Systems Inc. in Kentucky for H061 (fuel blending) processing.

During the visual inspection, we observed two 5-gallon containers inside of the Paint Kitchen (see Photos 1-3). The SAA container near the southwest wall of the Paint Kitchen was a five-gallon bucket, second from the left, that was a ½ full of paint and solvent. These SAA containers had original product labels on them but was not labeled with the words "Hazardous Waste" and the nature of the hazard. Photo 2 showed a closeup view of the same SAA 5-gallon bucket in the previous Photo 1. The container appears to be in good condition with no obvious leaks or damage. The lid is secured closed. The outside of the container is covered with stain/paint obscuring any labels. Photo 3 shows SAA container on the opposite side of the Paint Kitchen showing the additional waste paint and solvent collection processes. The 5-gallon SAA container (center of photo) is currently in use being filled. The lid is not secured. Only a flammable label from original contents and no Hazardous Waste label. Once full the contents of the SAA containers are transferred to the 55-gallon black steel drum in the Paint Line (PFI) location in the Paint Department (see Photo 6). The black 55-gallon steel drum with a closed/latched funnel and it appeared to be about 1/10 full of waste paint and solvent. Mr. Lumley stated that once full this drum is transferred to the CAA Blast Room. Due to hazardous waste paint/solvent being generated from a different SAA, I determined the 55-gallon drum to be a hazardous waste storage container (CAA container) and not a SAA container. On this 55-gallon drum, I observed a flammable label that appeared to be from the original product contents label, that was starting to fall off. There was no "Hazardous Waste" label and no accumulation start date on the drum. *[At the time of the inspection I initially issued a NOPF 4 for the unsecured lid of the SAA container in the Paint Kitchen, but since this SAA container was in the process of being filled, and after further review post inspection, this NOPF was rescinded].*

- **<u>NOPF 2</u>: Failure to label SAA containers in the Paint Kitchen and the ten-gallon yellow**

SAA rag container in the Blast Room with the words "Hazardous Waste" as required in 40 CFR 262.15(a)(5(i) *[NOPF modified post inspection to include the yellow container]*

- **<u>NOPF 3</u>: Failure to label the SAA container in the Paint Kitchen and the ten-gallon yellow SAA rag container in the Blast Room with the "nature of the hazard" (flammable) as required in 40 CFR 262.15(a)(5)(ii)** *[NOPF modified post inspection to include the yellow container]*

- **<u>NOPF 4</u>: Failure to keep SAA containers in the Paint Kitchen closed except when filling as required in 40 CFR 262.15(a)(4) – [*RESCINDED*]**

- **NOPF 5: Failure to label the 55-gallon black CAA drum along the SE wall of the Paint Line and the CAA drum of solvent contaminated rags on the SE Paint Line with the words "Hazardous Waste" as required in 40 CFR 262.16(b)(6)(i)(A)**

- **<u>NOPF 6</u>: Failure to label the 55-gallon black CAA drum along the SE wall of the Paint Line, with the with the nature of the hazard as required in 40 CFR 262.16(b)(5)(i)(B)**

- **<u>NOPF 11</u>: Failure to mark the accumulation start date on the 55-gallon HW storage drum along the SE wall of the Paint Line as required in 40 CFR 262.16(b)(6)(i)(C)**

<u>Flammable Liquids – Solvent Contained Cloth Rags</u> - Windsor Windows & Doors generates white cloth rags contaminated with waste paint and solvents during the manufacturing painting process. This waste had been determined to be D001 hazardous waste based on process and product knowledge (see Attachment #8 and #9 for SDS). The manifests describe this waste stream as: *UN1993 Waste Flammable Liquids, (Acetone, N-Butyl Acetate)*. Mr. Lumley estimates that they generate about 500 pounds per month of this waste stream. Onsite, the waste solvent contaminated rags are stored in 10-gallon metal step cans and transferred to 55-gallon drums. At least monthly, the 55-gallon drums are picked up by Safety Kleen and transferred to Safety Clean Systems in Dolton, Illinois, for H061 processing (fuel blending prior to energy recovery at another site). See Attachment #7 for the August 28, 2023, uniform hazardous waste manifests.

During the visual inspection, I observed a yellow 10-gallon step can (SAA container) of solvent contaminated cloth rags in the Blast Room CAA, which appeared to be about 9/10 full of solvent contaminated cloth rags (see Photo 7). It was not labeled with the words "Hazardous Waste" and the nature of hazard (flammable). I also observed a blue 55-gallon steel drum (CAA drum) of solvent contaminated cloth rags along the southeast wall of the Paint Line. The drum was full, and the lid securely closed. The rags appeared dry to the touch dry. It was not labeled with the words "Hazardous Waste" and not marked with the accumulation start date. There was a "Flammable Liquid" label which appeared to be from the original contents. The drum appears to be in good condition with no obvious damage or leaks (see Photo 5).

- **<u>NOPF 2</u>: Failure to the ten-gallon yellow SAA rag container in the Blast Room with the words "Hazardous Waste" as required in 40 CFR 262.15(a)(5(i)** *[NOPF modified post inspection to include yellow container]*

- **<u>NOPF</u> 3: Failure to label the ten-gallon yellow SAA rag container in the Blast Room with the "nature of the hazard" (flammable) as required in 40 CFR 262.15(a)(5)(ii)** *[NOPF modified post inspection to include yellow container]*

<u>Spent Parts Washer Solvent</u> - Windsor Windows & Doors generates about 20 gallons every four weeks of spent parts washer solvent from the parts washer located in the Fabrication area (see Photo 9). It is used in removing excess liquid glue from the glue applicator process. I contacted Mr. Lumley to request more information (invoice and SDS) on the solvent used via email on February 26, 2024, and a follow-up phone call on March 7, 2024. Mr. Lumley emailed me the invoice and a Safety Kleen certification. Mr. Lumley stated that the facility uses Safety Kleen Premium Solvent 150 and has determined the spent parts washer solvent to be non-hazardous waste based on process product and knowledge (see Attachment #13 for the solvent Safety Kleen invoice and certification). The certification indicates the spent solvent is non-hazardous. A review of the SDS for Safety Kleen Premium 150 online states it has a flashpoint of 148 degrees F. The parts washer is serviced onsite by Safety Kleen and disposed of by Safety Kleen Systems. No spent parts washer solvent is stored onsite.

<u>Used Oil</u> - Windsor Windows & Doors generates about five-gallons per year of waste hydraulic used oil from their PT5 Wood Bender machine. This used oil has been determined to be non-hazardous based product and process knowledge and is managed as used oil. Mr. Lumley stated that used oil is generally changed out annually (but typically only if there is a mechanical issue with the Wood Bender). On site the used oil is transferred to a 55-gallon drum and transported by Safety Kleen. There were no recent invoices to review, and no used oil observed onsite.

<u>Lead-Acid Batteries</u> - Windsor Windows & Doors generates about four lead-acid batteries per quarter from golf cart preventive maintenance. Mr. Lumley stated that they have a fleet of about 22 golf carts and 13 forklifts. He also noted that preventive maintenance oil changes are outsourced and not done onsite. The lead-acid batteries that are replaced are managed under Part 266, Subpart G and are sent to Interstate Battery for core exchange and recycling. I did not observe any spent batteries onsite.

<u>Powder Room Rinse Water</u> - Windsor Windows & Doors generates about 3,000 gallons of Powder Room rinse water per day. The rinse phase is part of their powder coating process (see Photos 11-13). The rinse water has been determined to be non-hazardous based product and process knowledge. Prior to discharge, the facility's process includes adding chemicals as needed to neutralize the pH to meet the specifications of their Publicly Owned Treatment Works as demonstrated in Photo 11.

<u>Scrap Metal</u> - Windsor Windows & Doors generates about 27,000 pounds per month of scrap metal generated from their window and door manufacturing processes. This waste had been determined to be non-hazardous based product and process knowledge. The scrap metal is stored onsite in bins and periodically sent to United Scrap (Des Moines, Iowa) for recycling.

<u>Spent Paint Booth Air Filters</u> - Windsor Windows & Doors generates several 12-inches by 12-inches paint booth intake air filters every two weeks and exhaust air filters weekly. The monthly

generation rate of the filters varies. The filters are dry, do not contain any free liquid, and had been determined to be non-hazardous based on product and process knowledge. Onsite, the spent air filters are disposed of in the general trash.

Aerosol Cans - Windsor Windows & Doors generates about four RCRA empty aerosol cans per month from maintenance operations. This waste is determined to be non-hazardous based on process and product knowledge. The empty cans are disposed of in the general trash. I did not observe any aerosol cans in use during the visual inspection.

Fluorescent Lamps - Windsor Windows & Doors generates about five fluorescent lamps per year from relamping activities. The facility is changing over to LED lighting, which they estimate is about 95% completed. Mr. Lumley stated that they manage the spent lamps as universal waste and box them up in protective boxes and send them to Batteries Plus for processing. I did not observe any spent lamps being generated or accumulated onsite.

General Trash - Windsor Windows & Doors generates about 13 tons per month of non-hazardous general trash from shop, maintenance, and business office operations. General trash is collected in five cubic yard bins such as in Photo 4 and transferred to the trash bay in Photo 10. Mr. Lumley estimates they generate about three 40-yard roll offs of trash weekly. The general trash is transported weekly by Waste Management (Des Moines, Iowa) to Polk County Landfill.

4.4 Other Areas Reviewed

Outside Facility Perimeter - I conducted a limited inspection of the outside perimeter of the facility and observed no hazardous waste storage tanks and containers except as noted above. See the aerial and map views in Attachment #1.

Central Accumulation Areas - The Blast Room functions as the CAA at this facility (see Photos 7-8). There is one black 55-gallon drum of waste paint/solvent left outside the Blast Room to facilitate multiple daily transfers of waste paint/solvent from the two SAA containers in the Paint Kitchen. The facility manages this drum as a SAA container. Due to hazardous waste paint/solvent being generated from a different SAA, I determined the drum to be a hazardous waste storage container (CAA container) and not a SAA container. Mr. Lumley stated that Safety Kleen had just picked up all their full drums from the CAA Blast Room in the previous few days and all the remaining drums in the CAA Blast Room were empties pending use. During the visual inspection, I did not observe any emergency contact information posted near to the CAA. I asked Mr. Lumley if inspections are performed on the CAA drums. Mr. Lumley stated that they do not perform, or log, weekly CAA hazardous waste inspections.

- **NOPF 7: Failure to post emergency contact information near the CAA as required in 40 CFR 262.16(b)(9)(ii)**

- **NOPF 8: Failure to conduct weekly CAA hazardous waste inspections as required in 40 CFR 262.16(b)(2)(iv)**

Preparedness and Prevention - The facility has numerous fire extinguishers, spill kits, and eye wash stations. The Paint Booth has a fire suppression system. As an SQG, the facility is required to have a basic emergency plan (see Attachment #10 for the facility's Emergency Action Plan). The facility is required to make arrangements with their local fire department and emergency response agencies. Mr. Lumley stated that the local fire department does a walkthrough of the facility about once a year, and they share their Emergency Action Plan with them. During August 2023, the facility operated as a LQG and failed to comply with emergency procedures (including maintaining a contingency plan and quick reference guide) per 40 CFR 262.17(a)(6).

- **NOPF 9: Failure to comply with emergency procedures (including maintaining a contingency plan quick reference guide) per 40 CFR 262.17(a)(6)** *[Note: required during LQG status in August 2023]*

Personnel Training - Mr. Lumley stated that all staff working with hazardous waste must undergo initial and annual training in safely handling of both hazardous waste and universal waste (see Attachment #11 for a training presentation). Mr. Lumley provided job descriptions for staff with hazardous waste handling duties. The job descriptions do not clearly indicate initial and recurrent training for staff with hazardous waste handling duties (see Attachment #12).

- **NOPF 10: Failure to have a written description of the introductory and continuing hazardous waste training provided to staff as required in 40 CFR 262.17(a)(7)(iv)(C)** *[Note: required during LQG status in August 2023]*

5.0 SUMMARY OF FINDINGS

- **NOPF 1a: Failure to provide SQG renotification as required in 40 CFR 262.18(d)(1)**

- **NOPF 1b: Failure to submit a Biennial Report as required in 40 CFR 262.41** *[Note: required during LQG status in August 2023]*

- **NOPF 2: Failure to label the two SAA containers in the Paint Kitchen and the ten-gallon yellow SAA rag container in the Blast Room, with the words "Hazardous Waste" as required in 40 CFR 262.15(a)(5(i)** *[NOPF modified post inspection to include yellow container]*

- **NOPF 3: Failure to label the two SAA containers in the Paint Kitchen and the ten-gallon yellow SAA rag container in the Blast Room with the "nature of the hazard" (flammable) as required in 40 CFR 262.15(a)(5)(ii)** *[NOPF modified post inspection to include yellow container]*

- **NOPF 4: *[RESCINDED]***

- **NOPF 5: Failure to label the 55-gallon black CAA drum along the SE wall of the Paint Line, and the CAA drum of solvent contaminated rags on the SE Paint Line, with the words "Hazardous Waste" as required in 40 CFR 262.16(b)(6)(i)(A)**

- **<u>NOPF 6</u>: Failure to label the 55-gallon black CAA drum along the SE wall of the Paint Line, with the with the nature of the hazard as required in 40 CFR 262.16(b)(6)(i)(B)**

- **<u>NOPF 7</u>: Failure to post any emergency contact information near the CAA as required in 40 CFR 262.16(b)(9)(ii)**

- **<u>NOPF 8</u>: Failure to conduct weekly CAA hazardous waste inspections as required in 40 CFR 262.16(b)(2)(iv)**

- **<u>NOPF 9</u>: Failure to comply with emergency procedures (including maintaining a contingency plan quick reference guide) per 40 CFR 262.17(a)(6)** *[Note: required during LQG status in August 2023]*

- **<u>NOPF 10:</u> Failure to have a written description of the introductory and continuing hazardous waste training provided to staff as required in 40 CFR 262.17(a)(7)(iv)(C)** *[Note: required during LQG status in August 2023]*

- **<u>NOPF 11</u>: Failure to mark the accumulation start date on the 55-gallon HW storage drum along the SE wall of the Paint Line as required in 40 CFR 262.16(b)(6)(i)(C)**

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

MARK HOLCOMB (Affiliate)
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Date: 2024.03.28 15:53:55 -05'00'

Mark Holcomb
Civil Investigator, SEE

Whisnant, Amber
Digitally signed by Whisnant, Amber
Date: 2024.03.29 13:47:04 -05'00'

Amber Whisnant
RCRA Section Chief, ECAD/Chemical Branch

Attachments:

1) Facility Aerial Map Views (4 pages)
2) Photo Log (15 photos and 17 pages)
3) Receipt for Documents (1 page)
4) Confidentiality Notice (l page)
5) EPA RCRA Notification Acknowledgement/Verification Report (1 page)
6) NOPF (2 pages)
7) Uniform Hazardous Waste Manifests (32 pages)
8) SDS White Lacquer Paint (20 pages)
9) SDS Barsol Solvent (12 pages)
10) Emergency Action Plan (1 page)

11) Training Outline (26 pages)
12) Job Descriptions (8 pages)
13) Invoice-Certification – Safety Kleen Parts Washer Solvent (2 pages)