

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

BARTON SOLVENTS INC.

2135 9th Avenue
Council Bluffs, Iowa 51501
712-322-2509 ext. 2002

EPA ID Number: IAD089570063

On

February 27, 2023

By

TOEROEK ASSOCIATES, INC.

For

U. S. ENVIRONMENTAL PROTECTION AGENCY

Region 7

Enforcement and Compliance Assurance Division

INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division/Chemical Branch/RCRA Section (ECAD/CB/RCRA) of the U. S. Environmental Protection Agency (EPA) Region 7, Toeroek Associates, Inc., and its subcontractor CLAENE Group (Toeroek team) conducted a hazardous waste compliance evaluation inspection (CEI) at Barton Solvents (Barton) at 2135 9th Avenue in Council Bluffs, Iowa. The CEI was conducted under the authority of Section 3007 of Resource Conservation and Recovery Act (RCRA), as amended. The CEI covered hazardous waste generator requirements, waste transporter requirements, used oil management, and universal waste requirements, as applicable. This report and its attachments present the results of the CEI.

PARTICIPANTS

BARTON:

Max Misner, Operations Manager

Tom Berkheimer, Vice President Regulatory Compliance (Exit briefing only)

Toeroek Team:

Clifford Nelles, Inspector, 816-213-5192

INSPECTION PROCEDURES

Prior to the CEI at Barton on February 27, 2023, I conducted a drive-by visual inspection. I did not observe any areas of concern during the drive-by. At approximately 7:40 a.m., I entered the main office, contacted the receptionist, and informed her that I was there to conduct a CEI. The office contacted Mr. Misner, who arrived in the lobby approximately 10 minutes later. I introduced myself and explained that I was there to conduct a hazardous waste CEI at Barton. Mr. Misner escorted me to a conference room where I conducted an entry briefing with him.

During the entry briefing, I presented my business card and EPA credentials to Mr. Misner. I explained the scope and procedures for the CEI. I explained the facility's right to make confidentiality claims for any or all the information obtained and provided a Notice Regarding Proprietary/Confidential Business Information. I stated that at the conclusion of the CEI, Mr. Misner would be presented with a Confidentiality Notice (Notice) with which he could make or not make a claim of confidentiality for the facility. I also provided Mr. Misner with a copy of U. S. Federal Codes 1001 and 1002, concerning communication of false statements and documents to federal inspectors, and RCRA Section 3007, explaining EPA's inspection authority, both of which he read.

A copy of each of the following documents was left with Mr. Misner during the inspection:

- RCRA Facility Access Information Sheet
- Mr. Trevor Urban's business card
- RCRA Section 3007
- U.S. Federal Codes 1001 and 1002
- Instructions for Responding to a Notice of Preliminary Findings
- Notice Regarding Proprietary/Confidential Business Information
- E-Manifest Fact Sheet: Generators
- Managing your Hazardous Waste: A Guide for Small Businesses
- U.S. EPA Small Business Resources Information Sheet
- Solvent-Contaminated Wipes Final Rule Summary Chart
- IDNR Excluded Solvent-Contaminated Wipes Rule: Management Practices for Wipes, Rags, and Shop Towels
- Recycling Electronics: A Guide for Businesses
- Lead-Based Paint Activities: Handling and Disposal
- Battery Recycling/Disposal
- Management of Fluorescent Lamps for Businesses
- Incompatible Chemicals
- Universal Wastes – Including Aerosol Cans
- TCLP – Toxicity Characteristic Leaching Procedure
- Part 279 Requirements: Used Oil Management Standards
- EPA Region 7 Emergency Response Program
- Chemical Facility Anti-Terrorism Standards
- Iowa Environmental Guide for Businesses

I reviewed the Notification Acknowledgment/Verification Report (Verification Report) with Mr. Misner (Attachment 1). Based on this review, I made no changes or updates to the Verification Report.

I conducted the visual inspection of the facility, accompanied by Mr. Misner. Following the visual inspection, I reviewed facility records including hazardous waste manifests with land disposal restriction (LDR) notifications, transporter logs, Safety Data Sheets (SDS), contingency plan, and training documentation. I prepared and completed a site-specific inspection checklist to document my observations.

At the conclusion of the CEI, I conducted an exit briefing with Messrs. Misner and Berkheimer. During the exit briefing, I provided a Receipt for Documents and Samples, which Mr. Misner signed, acknowledging receipt (Attachment 2). I provided Mr. Misner the Notice, which he signed indicating no confidential business information had been provided (Attachment 3). I made no preliminary findings during the inspection so a Notice of Preliminary Findings (NOPF) was not left with the facility at the conclusion of the CEI. However, I explained to Mr. Misner that findings might be added by EPA after review of the inspection report.

A map of the facility obtained during the CEI is included as Attachment 4, and a Google Earth aerial photograph of the facility is included as Attachment 5. The seven photographs taken during the CEI are included in Attachment 6. All of the photographs are used in the report.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

Barton is dedicated to the handling of bulk and blended solvent, and provides bulk storage, re-packaging, and distribution of industrial products. Products are received by railcar or tanker truck and pumped into aboveground storage tanks (AST). Products are then transferred into various (55-gallon to 550-gallon) containers prior to distribution to its customers. Barton also mixes various solvents to produce blended solvent products. After production, the blended solvent is containerized and shipped to their customers.

Solvent handling activities generate hazardous waste flammable liquids and solids. Waste flammable liquids are generated from drum reconditioning area (DRA), product packaging/filling, and paint gun cleaning activities. Waste flammable liquids are containerized in 55-gallon hazardous waste satellite accumulation containers (SAC), and full containers are transferred to the less than 90-day hazardous waste container accumulation area (HWCAA). Waste flammable solids are generated from spill clean-up. Upon generation, waste flammable solids are transferred to a SAC or a hazardous waste accumulation container (HWAC) in the HWCAA. Waste flammable liquids and solids are shipped to WRR Environmental Services, Inc in Eau Claire, Wisconsin (WRR Environmental Services), for fuel blending.

Product testing in the laboratory (lab) area also generates hazardous waste flammable liquids. Lab waste flammable liquids are collected in a 300-milliliter (mL) SAC. The 300-mL SAC is transferred to a 55-gallon HWAC in the HWCAA each day.

The facility generates oil line flush (waste oil) from flushing oil filling lines with virgin product oil. The waste oil is not contaminated with physical or chemical impurities, and does not meet the definition of used oil. Waste oil is collected in 55-gallon containers upon generation and is sold to WRR Environmental Services for use as boiler fuel.

Cloth rags used for wipe cleaning during production and maintenance activities are managed as excluded solvent-contaminated wipes according to provisions of Title 40 *Code of Federal Regulations* (40 CFR) 261.4(a)(26). Excluded solvent-contaminated wipes are accumulated in 15-gallon containers. The wipes are collected weekly by Max I. Walker Uniform and Apparel (Walker) for laundering and are returned.

In the drum reconditioning area (DRA), 55-gallon product containers returned to Barton from customers are cleaned and painted prior to reuse. Residual product and cleaning solvent generated from container cleaning is either placed into a Barsol Mix container for reuse, or placed into a 55-gallon SAC if the product and solvent cannot be reused for blending. The cleaned, 55-gallon containers are painted with a solvent-based paint in a paint booth during the drum reconditioning process. Waste paint-related material (WPRM) is considered hazardous and is shipped offsite as waste flammable liquids. Spent paint booth filters are considered nonhazardous and placed in 55-gallon container upon generation.

Facility and equipment maintenance generates waste lamps and batteries. The facility manages all waste lamps and batteries as universal waste, according to provisions of 40 CFR Part 273. Universal wastes are shipped annually to WRR Environmental Services for recycling.

Vehicle maintenance for the facility's truck fleet is performed off-site by various companies (for example, Freightliner, Cornhusker International, and Complete Truck Repair), depending on the type of maintenance needed. Fleet vehicles are cleaned onsite with soap and water in a Truck Service bay. The washdown wastewater is considered a nonhazardous waste. The washdown wastewater collects in a four-foot by four-foot pit in the service bay, with overflow discharging into the City of Council Bluffs sanitary sewer system for treatment at the City of Council Bluffs publicly owned treatment works (POTW). Mr. Misner stated that the soapy water discharge is permitted under City of Council Bluffs sewer use regulations. Cleanout of the pit in the service bay is performed approximately once per year by Seneca Companies (Grandview, MO). The pit cleanout sludge is considered nonhazardous by process knowledge. Washdown wastewater and pit sludge are not discussed further in this report.

Barton also operates as a hazardous waste transporter and transfer facility. Containers of hazardous and nonhazardous waste are collected from customers and transported to the Barton facility. Barton maintains the transporter copy of the manifests and records each waste on a Waste Check-in Form. The facility has weekly hazardous waste shipments, and ships customer hazardous wastes to a treatment, storage, or disposal (TSD) facility within 10 days of receipt.

According to Mr. Misner, Barton has been operating at its current location since 1952. Barton employs approximately 31 personnel and operates one primary shift (7:00 a.m. to 5:00 p.m.) on a Monday through Friday schedule. The facility consists of approximately 53,000 square feet

under roof, divided into seven warehouse areas, truck service area, and an office area. The outside is divided into two tank farm areas with loading docks.

Barton was last inspected on April 16-17, 2018, by an EPA contractor. During the April 16-17, 2018, CEI, the inspector left the following preliminary finding:

- Failure to make a hazardous waste determination of absorbent pads at the point of generation

The above preliminary finding was not repeated during this CEI.

2. RCRA Status

Barton is identified on the Verification Report provided by EPA (Attachment 1) as a large quantity generator (LQG) of hazardous waste (generating more than 1,000 kg of hazardous waste per month) and a hazardous waste transporter. I reviewed the facility's 2021 Biennial Report before the inspection (Attachment 7). The 2021 Biennial Report lists five hazardous waste streams and a total of 67,227 pounds (30,494 kg) of hazardous waste generated in 2021. This equates to approximately 5,602 pounds (2,541 kg) of hazardous waste per month. During the CEI, I reviewed hazardous waste manifests from 2022 and 2023 and confirmed a similar waste generation rate. Therefore, I determined that Barton is operating as a LQG of hazardous waste and inspected the facility as such. I also determined that Barton is operating as a hazardous waste transporter, less-than-10-day hazardous waste transfer facility, and a small quantity handler (SQH) of universal waste (accumulating less than 5,000 kg of universal waste at any time).

3. Waste Streams

This section of the CEI report describes the waste streams generated by the facility, including the facility's waste determination and waste codes, generation process and rate, management at the facility, and ultimate disposition. The following discussion of waste streams is based on conversations with facility representatives, the visual inspection, and my review of waste shipping documents. Mr. Misner accompanied me during the visual inspection.

Waste flammable liquids are generated from flushing product fill lines in the load/unload areas, cleaning containers in the DRA, and painting containers in the DRA. The facility considers waste flammable liquids to be hazardous (D001, D018, D035, F003, F005) based on product and process knowledge. Based on the 2021 Biennial Report (Attachment 7), the facility generates approximately 4,915 pounds of waste flammable liquids per month. Waste flammable liquids are containerized in 55-gallon SAC, and full SACs are transferred to the HWCAA. The waste is shipped to WRR Environmental Services for fuel blending.

During the CEI, I observed three 55-gallon SACs of waste flammable liquids in three separate load/unload areas and one 55-gallon SAC of waste flammable liquids in the Oil Room. All SACs were at or near the point of generation, under control of the operator, structurally sound, closed, labeled with the words "hazardous waste" and an indication of the nature of the hazard, and held less than 55-gallons of waste. Representative photographs of the waste flammable liquids SACs are in Attachment 6, Photographs 1, 2, and 7.

I observed three 55-gallon HWACs in the Oil Room HWCAA (Attachment 6, Photograph 5). The HWACs were structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and marked with accumulation start dates. The oldest accumulation start date was December 23, 2022. I noted no deficiencies with management of waste flammable liquids during the CEI.

Waste flammable liquids-lab waste is generated during product testing in the lab. The lab uses several solvents for testing, and copies of the SDSs for benzene and butanol are included as Attachments 8 and 9 as examples. The facility considers waste flammable liquids-lab waste to be hazardous (D001, D018, D035, F003, F005) based on product and process knowledge. The facility generates approximately 300 mL of waste flammable liquids-lab waste per day. The waste is accumulated in a 300-mL SAC that is emptied into a HWAC in the HWCAA daily. The waste is shipped to WRR Environmental Services for fuel blending.

I observed the 300-mL SAC in the lab during the CEI. The SAC was near the point of generation, under control of the operator, structurally sound, closed, and labeled with the words “hazardous waste” and an indication of the nature of the hazard. I noted no deficiencies with management of waste flammable liquids-lab waste during the CEI.

Waste flammable solids are generated during the clean-up of flammable liquids. Mr. Misner explained that the waste stream consists primarily of waste absorbent materials (i.e. floor dry, absorbent pillows and socks) utilized in the clean-up of spills. The facility considers waste flammable solids to be hazardous (D001, F003) based on product and process knowledge. Based on the 2021 Biennial Report (Attachment 7), the facility generates 263 pounds of waste flammable solids per month. The waste is shipped to WRR Environmental Services for fuel blending.

During the CEI, I observed one 55-gallon SAC of waste flammable solids in a load/unload area (Attachment 6, Photograph 3). The SAC was near the point of generation, under control of the operator, structurally sound, closed, and labeled with the words “hazardous waste” and an indication of the nature of the hazard. I also observed two 55-gallon HWACs of waste flammable solids in the Oil Room HWCAA (Attachment 6, Photograph 5). The HWACs were structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and marked with accumulation start dates. The oldest accumulation start date was December 23, 2022. I noted no deficiencies with management of waste flammable solids during the CEI.

Spilled organic solvents are generated by cleanup of solvents spilled during transfer, blending, or repackaging. Mr. Misner stated that when spills occur, the spilled solvent is vacuumed up, and accumulated in 55-gallon HWACs, and transferred to the HWCAA. The facility considers spilled organic solvents to be hazardous (D001, D018, D035, F003, F005) based on product and process knowledge. Based on the 2021 Biennial Report (Attachment 7), the facility generates approximately 211 pounds of spilled organic solvents per month. The waste is shipped to WRR Environmental Services for fuel blending. I did not observe spilled organic solvents in accumulation during the CEI.

Waste aerosol cans are generated by facility maintenance. When aerosol cans are empty, they are transferred to a 5-gallon SAC in the maintenance area. The facility considers waste aerosol cans to be hazardous (D001, D003) based on product and process knowledge. The facility generates approximately two waste aerosol cans per month. The waste is shipped to WRR Environmental Services for fuel blending. During the CEI, I observed that the 5-gallon SAC in the maintenance area was empty. I provided compliance assistance on the options to manage the aerosol cans as universal waste.

Spent paint booth filters are generated when the paint booth filters in the DRA paint booth are no longer effective and are changed out. Paint booth filters are not sprayed with gun cleaning solvent and are dry when changed out. The facility considers spent paint booth filters to be nonhazardous based on product and process knowledge. The facility generates approximately 400 pounds of spent paint booth filters per month. The waste is accumulated in 55-gallon containers and transferred to the HWCAA. Spent paint booth filters are shipped to WRR Environmental Services for energy recovery. During the CEI, I observed the paint booth filters in the DRA paint booth (Attachment 6, Photograph 6). I did not observe spent paint booth filters in accumulation.

WPRM is generated by cleaning the paint gun at the DRA paint booth. Cleaning is performed by flushing solvent through the paint gun into a 55-gallon SAC. The facility considers WPRM to be hazardous (D001, D018, D035, F003, F005) based on product and process knowledge. Copies of the SDSs for BARTON-DRUM GREEN enamel paint and acetone are included as Attachments 10 and 11. Based on the 2021 Biennial Report (Attachment 7), the facility generates approximately 211 pounds of WPRM per month. The waste is shipped to WRR Environmental Services for fuel blending.

During the CEI, I observed the DRA paint booth and did not observe a SAC. Mr. Misner stated that the SAC had just been transferred to the HWCAA that morning, and that a new SAC would be placed when painting resumed.

Excluded solvent-contaminated wipes are cloth rags used for general wipe cleaning in the solvent and oil operations at the facility. The facility manages used cloth rags as excluded solvent-contaminated wipes according to provisions of 40 CFR 261.4(a)(26). Excluded solvent-contaminated wipes are accumulated in 15-gallon containers throughout the facility. The wipes are collected weekly by Walker for laundering and are returned. Barton has a written plan that, if stand-alone liquids are discovered in a excluded solvent-contaminated wipes container, the liquid is removed, put into a satellite container, and managed as a flammable liquid hazardous waste. A copy of an invoice from Walker, dated February 24, 2023, is included as Attachment 12. Based on the invoice, the facility generates approximately 150 excluded solvent-contaminated wipes per week.

During the CEI, I observed six excluded solvent-contaminated wipes containers. All six containers were in good condition, closed, and labeled with the words "excluded solvent-contaminated wipes." No free liquids were observed in these containers. I noted no deficiencies with management of excluded solvent-contaminated wipes during the CEI.

Waste lamps are generated when maintenance personnel replace spent fluorescent lamps. The facility manages waste lamps as universal waste according to provisions of 40 CFR Part 273. Mr. Misner stated that Barton generates approximately 20 waste lamps per month. Waste lamps are accumulated in universal waste accumulation containers and shipped to WRR Environmental Services for recycling. During the CEI, I observed an empty universal waste lamps accumulation container in the HWCAA. I did not observe waste lamps in accumulation.

Waste batteries are generated during equipment maintenance. Barton manages all waste batteries as universal waste according to provisions of 40 CFR Part 273. The facility generates approximately 1 pound of waste batteries per month. Waste batteries are accumulated in universal waste accumulation containers and shipped to WRR Environmental Services for recycling. I did not observe waste batteries in accumulation during the CEI.

General trash consists of office-type refuse, such as waste packaging materials and food containers. The facility has determined general trash to be nonhazardous based on product and process knowledge. General trash is accumulated in several containers throughout the facility. General trash is collected by Papillion Sanitation and transported to Sarpy County landfill for disposal. During the CEI, I noted no deficiencies with management of general trash at the facility.

4. Required Response Equipment and Hazard Management

Per 40 CFR 262.15(a)(8) and 262.17(a)(6), a LQG must operate to minimize the possibility of a fire, explosion, or spill, and must maintain emergency response equipment. During the visual inspection, I observed spill response equipment comprised of mats, absorbent materials, shovels, and brooms, as well as the presence and availability of fire extinguishers. I determined that the spill and fire response equipment was adequate for the hazardous wastes generated and accumulated at the facility.

5. Container Accumulation Area

Barton maintains one HWCAA in the Oil Room. At the time of the CEI, I observed five 55-gallon HWACs in the HWCAA (Attachment 6, Photograph 5). Three HWACs held waste flammable liquids and two HWACs held waste flammable solids. Each HWAC was structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and marked with an accumulation start date ranging from December 23, 2022, to February 27, 2023. Based on my observations during the inspection, the containers were fully accessible and could be fully inspected from all sides. According to Mr. Misner, the HWCAA is inspected weekly and a log is maintained. I reviewed three years of inspection logs and noted no missed inspections. A copy of the inspection log for December 2022 through February 21, 2023 is included as Attachment 13. I asked Mr. Misner how a worker would summon emergency assistance. He stated that all of the workers who handle hazardous waste carry a two-way radio.

6. Less-Than-Ten-Day Transfer Area

Mr. Misner stated that the facility picks up hazardous and nonhazardous waste from its customers and transports the waste to its less-than-10-day transfer area adjacent to the HWCAA.

Wastes received in the transfer area are logged into a tracking database (Attachment 14). Mr. Misner stated that the customer's hazardous waste manifests are left intact, and the hazardous wastes are transferred offsite to WRR Environmental Services within 10 calendar days. At the time of the CEI, the less-than-10-day transfer area was empty as Barton had transferred all of the waste to WRR Environmental Services that morning.

I asked Mr. Misner if the less-than-10-day transfer area was inspected. He stated that the transfer area was inspected at the same time as the HWCAA and the inspector carried a two-way radio. Copies of the waste tracking spreadsheets for transfer area wastes shipped on January 09, 2023, January 17, 2023, and February 27, 2023, are included in Attachment 15. The spreadsheet shows the date that the waste was picked up from customers, manifest numbers, container inventory, and the date of offsite transfer.

7. Manifests and Biennial Report

Barton generated manifests for 85 hazardous waste shipments from February 27, 2020, to February 27, 2023. During the CEI, I reviewed manifests and LDR notifications for five shipments in 2020, five in 2021, five in 2022, and eight in 2023. Copies of the manifest and land disposal restrictions (LDR) for a shipment dated January 20, 2023, are included in Attachment 16. The facility submitted its 2021 Hazardous Waste Biennial Report on February 22, 2022 (Attachment 7). I noted no deficiencies during my review of manifests and the biennial report.

8. Preparedness and Prevention Plan

LQG facilities are required by 40 CFR 262.17(a) to meet the emergency preparedness, prevention, and procedures requirements including documented arrangements with response agencies. According to Mr. Misner, Barton is the subject of a regular inspection by the Council Bluffs Fire Department hazardous materials team. During those inspections, he said the fire department is shown the layout of the facility, the location of the hazardous waste HWCAA, and other facility features.

During the CEI, I reviewed the facility's Contingency Plan and noted that the contingency plan appeared to meet all content requirements, including a Quick Reference Guide. Copies of the Contingency Plan page listing emergency coordinators and the table of contents are included in Attachment 17.

9. Personnel Training Requirements

Personnel training is required by LQG regulations specified in 40 CFR 262.17(a)(7) to ensure that employees are thoroughly familiar with proper waste handling procedures relevant to their responsibilities. During the CEI, I asked Mr. Misner if hazardous waste training is provided to employees. He stated that hazardous waste management training is provided to all employees who handle hazardous waste within six months of hiring or being assigned to a job that handles hazardous waste. He also stated that annual refresher training is conducted. I asked Mr. Misner who conducts the training. He stated that all training is performed in-house and that he has conducted the training for the last two years. I asked Mr. Misner what training he has received. He provided copies of certificates for 2021 and 2022 and a record of his attendance

(Attachment 18). Copies of training records for Tony Fairchild and Andrew Peck are included in Attachment 19 as examples of the training documentation maintained at the facility. I reviewed the written job description for Mr. Misner and noted that the job description appeared to be adequate. A copy of the Job Description for an Operations Manager is included as Attachment 20.

10. Air Emissions: 40 CFR Part 265 Subparts AA, BB, CC

EPA regulations in 40 CFR Part 265, Subparts AA, BB, and CC apply to LQGs. If a LQG manages hazardous waste with an organic concentration greater than 10 parts per million by weight (ppmw), the standards specified in Subpart AA apply to hazardous waste air emissions from certain process vents. A process vent used in distillation, fractionation, solvent extraction, thin-film evaporation, air stripping, or steam stripping is regulated by Subpart AA. Barton is not subject to the Subpart AA regulations because the facility does not have any of the process vents listed above.

If a LQG has equipment that contains or contacts hazardous waste composed of 10 percent or greater organics by weight, the facility is subject to Subpart BB standards for inspection and monitoring of the equipment. Barton is not subject to the Subpart BB regulations because it does not have equipment that contains or comes in contact with hazardous waste.

The standards found in Subpart CC apply to LQGs that manage hazardous waste in containers with organic compounds (VOC) concentration that exceeds 500 ppmw. The Subpart CC standards are applicable because the facility accumulates hazardous waste that contains VOCs in 55-gallon hazardous waste accumulation containers. During the CEI, I determined that Barton meets the Subpart CC requirements for containers by using Container Level 1 controls (hazardous waste accumulation containers smaller than 122 gallons that are Department of Transportation [DOT]-approved). I noted no concerns with management of hazardous waste per the Subpart CC air emissions requirements.

10. Summary of Preliminary Findings

In summary, as part of the CEI, I did not make any preliminary findings.

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

Clifford A.
Nelles

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A. Nelles
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Clifford A. Nelles, Inspector
CLAENE Group

AMBER WHISNANT

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Date: _____

Amber Whisnant, Section Chief
ECAD/CB/RCRA, EPA Region 7

Attachments:

1. Notification Acknowledgement/Verification Report (2 pages)
2. Receipt for Documents and Samples (1 page)
3. Confidentiality Notice (1 page)
4. Site Map (1 page)
5. Google Earth Photograph of Facility (1 page)
6. Photographic Documentation (Photolog and 7 Photographs) (6 pages)
7. Copy of 2021 Biennial Report (6 pages)
8. Copy of SDS for Benzene (13 pages)
9. Copy of SDS for Butanol (12 pages)
10. Copy of SDS for F75EX 3.5 VOC HE ALKYD ENAMEL with PHX Colorants BARTON-DRUM GREEN (22 pages)
11. Copy of SDS for Acetone (18 pages)
12. Copy of Invoice dated February 24, 2023 from Max I. Walker (1 page)
13. Copy of December 2022-February 2023 Inspection Log (1 page)
14. Copy of Shipping History by Company (1 page)
15. Copy of Checked In and Out Sheet for Less-Than-10-Day Transfer (3 pages)
16. Copy of Manifest and LDR for a shipment dated January 20, 2023 (2 pages)
17. Copy of Contingency Plan Contact Sheet and Table of Contents (2 pages)
18. Copies of Training Records for Max Misner (3 pages)
19. Copies of Training Records for Tony Fairchild and Andrew Peck (2 pages)
20. Copy of Job Description for Operations Manager (4 pages)