

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

KEMIN INDUSTRIES INC.

2100 Maury Street
Des Moines, Iowa 50317
515-559-5489

EPA ID Number: IAD005274287

On

February 18, 2025

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 Kemin Industries (Kemin) at 2100 Maury Street in Des Moines, Iowa. The CEI was conducted under the authority of Section 3007 of the 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

Kemin:

Joel Tichy, Senior Environmental Health and Safety Manager

Dan Jennings, Safety and Environmental Engineer

Beth Davidson, Worldwide Intellectual Property & Regulatory Affairs Specialist

Toeroek Team:

Clifford Nelles, Inspector, 816-213-5192

INSPECTION PROCEDURES

Prior to the CEI at Kemin on February 18, 2025, I conducted a drive-by visual inspection. I did not observe any areas of concern during the drive-by. At approximately 8:00 a.m., I entered the gate at 2100 Maury Street and attempted to enter the building. I then called Mr. Tichy, who was listed as the site contact on the Notification Acknowledgment/Verification Report (Verification Report) provided by EPA prior to the inspection (Attachment 1). I informed Mr. Tichy that I was there to conduct a CEI. He informed me that to enter the facility, I had to go to the corporate headquarters at 1900 Scott Street, and that he would meet me there in approximately 10 minutes. Mr. Tichy, Mr. Jennings, and Ms. Davidson (Kemin team) met me in the lobby of the corporate headquarters building approximately 10 minutes later. I introduced myself and explained that I was there to conduct a hazardous waste CEI at Kemin. The Kemin team escorted me to a conference room in Building #1 where I conducted an entry briefing with them.

During the entry briefing, I presented my business card and EPA credentials to the Kemin team. 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. Tichy 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 the Kemin team 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 they read.

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

- RCRA Facility Access Information Sheet
- 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

The following documents were sent electronically to Mr. Tichy.

- 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 Verification Report with Mr. Tichy (Attachment 1). Based on this review, I changed the Site Contact mailing address to 1900 Scott Street. I made no other changes or edits to the Verification Report.

I conducted the visual inspection of the facility, accompanied by the Kemin team. 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 the Kemin team. During the exit briefing, I provided a Receipt for Documents and Samples, which Mr. Tichy signed, acknowledging receipt (Attachment 2). I provided Mr. Tichy the Notice, which he signed indicating no confidential business information had been provided (Attachment 3). I also provided Mr. Tichy a Notice of Preliminary Findings (NOPF), which he signed to acknowledge receipt (Attachment 4).

A map of the facility obtained during the CEI is included as Attachment 5, and a Google Earth aerial photograph of the facility is included as Attachment 6. The 28 photographs taken during the CEI are included in Attachment 7, of which 24 are described in this report.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

Kemin is a manufacturer of nutritive and non-nutritive additives for both human and animal foods. Major raw materials include nutritive additives such as solvents, vegetable oil, copper, zinc, and cobalt. Non-nutritive additives include mold inhibitors, antioxidants, surfactants, and enzymes.

The major manufacturing or processing operations that generate wastes include quality control/quality assurance (QC/QA) and Research and Development (R&D) testing; facility and equipment maintenance; rosemary extraction; waste encapsulation; management of expired and unwanted lab chemicals; and general facility operations. The major wastes generated during testing, manufacturing, and management of expired and unwanted chemicals include spent lab solvent (identified as HEAT waste), lab pack wastes, waste acetonitrile (ACN), and rosemary biomass waste. The facility considers spent lab solvents, lab pack wastes, and waste ACN to be hazardous waste based on product and process knowledge. These wastes are shipped off site for fuel blending. Rosemary biomass waste is considered to be nonhazardous waste based on product and process knowledge and is collected for landfill disposal.

Facility and equipment maintenance generate used oil, waste batteries, and general trash. The facility manages used oil according to provisions of Title 40 *Code of Federal Regulations* (40 CFR) Part 279. Waste batteries are managed as universal waste according to provisions of 40 CFR Part 273. Used oil and waste batteries are shipped off site for recycling. General trash is considered to be nonhazardous waste based on product and process knowledge and is collected for landfill disposal.

In 2020, the facility was re-lamped with light emitting diode (LED) lamps, which are considered to be nonhazardous when spent. No universal waste lamps are currently generated at Kemin.

Kemin began operating in 1987 and employs approximately 755 people. The facility consists of 13 buildings on 42 acres of land with a footprint of approximately 270,000 square feet under roof. The facility operates 24 hours a day, 7 days a week. The facility has approximately 755 employees who work one of three variable shifts.

Kemin was last inspected on November 19, 2020, by an EPA contractor. During the November 19, 2020, CEI, the inspector left the following preliminary findings:

- Accumulating hazardous waste beyond 90 days without a RCRA permit
- Failure to keep hazardous waste accumulation containers (HWACs) closed
- Failure to mark HWACs with a start date
- Failure to label HWACs with the words “hazardous waste”
- Failure to label a satellite accumulation container (SAC) with the words “hazardous waste”
- Failure to label a HWAC with an indication of the nature of the hazard
- Failure to label a SAC with an indication of the nature of the hazard
- Failure to separate containers of incompatible waste
- Failure to make a hazardous waste determination
- Failure to prepare a Quick Reference Guide
- Failure to provide evacuation route and alternate route in the Contingency Plan
- Failure to keep SACs closed
- Failure to conduct annual refresher training for employees who handle hazardous waste

One of these findings (failure to label a SAC with an indication of the nature of the hazard) was repeated during this CEI.

2. RCRA Status

Kemin 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 kilograms [kg] of hazardous waste per month). Prior to the CEI, I reviewed the facility’s 2023 Biennial Report (Attachment 8). The 2023 Biennial Report includes 95 hazardous waste streams totaling 64,731 pounds (29,361 kg). The three largest waste streams (Attachment 8, Generation and Management [GM] wastes 18, 6, and 16) totaled 32,723 pounds (14,874 kg) in 2023. This equates to approximately 2,727 pounds (1,253 kg) of hazardous waste per month for these waste streams alone, assuming consistent rate of generation. During the CEI, I reviewed hazardous

waste manifests from February 18, 2022, through February 18, 2025, and confirmed similar and consistent hazardous waste generation rates. Hazardous wastes are shipped off site approximately monthly. Therefore, I inspected Kemin as a LQG of hazardous waste. I also inspected the facility as a used oil generator and 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. The Kemin team accompanied me during the visual inspection.

Spent lab solvents consist of several solvents used in QA/QC and R&D labs. The primary spent solvent stream is identified as HEAT waste. Based on the 2023 Biennial Report, the facility generates approximately 2,727 pounds (1,253 kg) of spent lab solvents per month. Kemin considers spent lab solvents to be hazardous waste (D001, D002, D008, D022, F003, F005, and/or other codes as applicable) based on product and process knowledge. Copies of the SDS for the chemicals used in the laboratories (sulfuric acid concentrate, ethanol, toluene, acetone, n-heptane, hexane, Nelson Colour Reagent, CAN, and Sal CURB ASF Liquid) are included as Attachments 9 through 17, respectively. The waste is accumulated in SACs at the lab stations and transferred to HWACs. Spent lab solvents are transported to Veolia Technical Solutions in Menomonee Falls, Wisconsin, for fuel blending.

During the CEI, I observed several 2- or 5-gallon containers at lab stations that the facility said were SACs. All of the containers were connected directly to analytical machines via tubing. The containers were glass or metal, depending on the waste. The containers were at the point of generation, under control of the operator, structurally sound, and closed. They were labeled with the words "hazardous waste" and an indication of the nature of the hazard. I asked Mr. Jennings if the laboratory machines could operate without the containers. He stated that the machines could not operate without the SACs. I asked Mr. Tichy what happens to the containers when they are full. He stated that each laboratory has a hazardous waste central accumulation area (HWCAA) and the SACs are emptied into either a 5-, 10-, 20-, or 55-gallon HWAC in the HWCAA at each building.

Kemin maintains six HWCAA, one each in Building #2, Building #3, Building #4, Building #5, Building #8, and the MAC building. The HWCAA in Building #5 was empty at the time of the CEI.

In the Building #2 HWCAA, I observed:

- One 55-gallon HWAC of spent lab solvents (Sal Curb ASF Liquid) (Attachment 7, Photograph 1). The HWAC was structurally sound, closed, labeled with the words "hazardous waste" and an indication of the nature of the hazard, and dated December 9, 2024. It held approximately 40 gallons of waste.

In the Building #4 HWCAA, I observed:

- One 55-gallon HWAC of spent lab solvents (Nelson Color Reagent). The HWAC was structurally sound, closed, labeled with the words "hazardous waste" and an indication of the nature of the hazard, and dated December 6, 2024. It held approximately 20 gallons of waste. According to the SDS, Nelson Colour Reagent appeared to be nonhazardous. I asked Mr. Tichy why the facility had determined the waste to be hazardous. He stated that the reagent came into contact with hazardous waste during the manufacturing process and that the facility manages the waste as hazardous.
- One 55-gallon HWAC of spent lab solvent (HEAT waste) (Attachment 7, Photograph 3). The HWAC was structurally sound, closed, labeled with the words "hazardous waste" and an indication of the nature of the hazard, and dated December 18, 2024. It held approximately 40 gallons of waste.
- One 15-gallon HWAC of spent lab solvent (PV waste) (Attachment 7, Photograph 4). The HWAC was structurally sound, closed, labeled with the words "hazardous waste" and an indication of the nature of the hazard, and dated January 10, 2025. It held approximately 15 gallons of waste.
- HWACs of spent lab solvent (high-performance liquid chromatography [HPLC] vials) (Attachment 7, Photograph 7). The HWACs were structurally sound, closed, labeled with the words "hazardous waste" and an indication of the nature of the hazard, and dated December 6, 2024, through January 8, 2025.

In the Building #8 HWCAA, I observed:

- One 55-gallon HWAC of spent lab solvents (HEAT waste) (Attachment 7, Photographs 11-12). The HWAC was structurally sound, closed, labeled with the words "hazardous waste" and an indication of the nature of the hazard, and dated February 14, 2025. It held approximately 15 gallons of waste.
- One 5-gallon HWAC of spent lab solvents (heptane) (Attachment 7, Photographs 13 and 14). The HWAC was structurally sound, closed, labeled with the words "hazardous waste" and an indication of the nature of the hazard, and dated February 7, 2025. It held approximately 4 gallons of waste.
- One 20-gallon HWAC of spent lab solvents (composite acid waste) (Attachment 7, Photograph 15). The HWAC was structurally sound, closed, labeled with the words "hazardous waste" and an indication of the nature of the hazard, and dated December 20, 2024. It held approximately 15 gallons of waste.
- One 20-gallon HWAC of spent lab solvents (Sal Curb ASF Liquid) (Attachment 7, Photographs 16 and 17). The HWAC was structurally sound, closed, labeled with the words "hazardous waste" and an indication of the nature of the hazard, and dated January 12, 2025. It held approximately 15 gallons of waste.
- One 20-gallon HWAC of spent lab solvents (HPLC vials) (Attachment 7, Photograph 19). The HWAC was structurally sound, closed, labeled with the words "hazardous waste" and an indication of the nature of the hazard, and dated December 16, 2024. It held approximately 15 gallons of waste.
- One 5-gallon HWAC of spent lab solvents (heptane) (Attachment 7, Photograph 20). The HWAC was structurally sound, closed, labeled with the words "hazardous waste" and an indication of the nature of the hazard, and dated February 16, 2025. It held approximately 4 gallons of waste.

In the MAC Building HWCAA, I observed:

- Five 1-gallon HWACs of spent lab solvents (sulfuric acid) (Attachment 7, Photograph 24). The HWACs were structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and dated December 3, 2024. They were all full.
- Five 1-gallon HWACs of spent lab solvents (HEAT waste) (Attachment 7, Photograph 25). The HWACs were structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and dated December 19, 2024. They were all full.
- One 1-gallon HWAC of spent lab solvents (sulfuric acid) (Attachment 7, Photograph 27). The HWAC were structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and dated January 17, 2025. They were all full.

During the CEI, I observed a 5-gallon SAC of spent lab solvents (acetone) in the Building #8 laboratory (Attachment 7, Photographs 21 and 22). The SAC was not connected to an analytical machine. The SAC was structurally sound, near the point of generation, under control of the operator, closed, and labeled with the words “hazardous waste.” However, the container did not have a Department of Transportation pictogram affixed to the container, which Mr. Tichy said was the system used by Kemin to indicate the nature of the hazard. Because a pictogram label was not present, I determined the facility failed to label a SAC with an indication of the nature of the hazard, as required by 40 CFR 262.15(a)(5)(ii) (**NOPF No. 1**).

I provided compliance assistance regarding SAC labeling requirements. During the CEI, employees of Kemin affixed labeling to indicate the nature of the hazard (Attachment 7, Photograph 23).

Used oil is generated during equipment maintenance. Kemin generates approximately 55 gallons of used oil per month. The facility manages used oil according to provisions of 40 CFR Part 279. Used oil is accumulated in 55-gallon containers and is transported to Veolia Technical Solutions in Menomonee Falls, Wisconsin, for recycling. I did not observe accumulation of used oil during the CEI.

Lab pack waste consists of expired/unwanted chemicals from the laboratories. Kemin generates approximately 108 pounds (49 kg) of lab pack waste per month. The facility considers lab pack waste to be hazardous (D001, D008, F003, F005, and/or other waste codes as applicable) based on product and process knowledge. The waste is containerized in SACs upon generation, transferred to a HWCAA, and transported to Veolia Technical Solutions in Menomonee Falls, Wisconsin, for bulking/offsite transfer. I observed satellite accumulation of lab pack waste during the CEI and noted no deficiencies or concerns.

Waste ACN is generated during testing in the laboratories. The facility considers waste ACN to be hazardous (D001, F003) based on product and process knowledge. The generation rate for acetonitrile is included in the generation rate for spent lab solvents. The waste is accumulated in

SACs at the lab stations and transferred to HWACs. Waste ACN is transported to Veolia Technical Solutions in Menomonee Falls, Wisconsin, for fuel blending.

In the Building #2 HWCAA, I observed:

- Two 5-gallon HWACs of waste ACN and water (Attachment 7, Photograph 2). The HWACs were structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and dated December 15, 2024. They each held approximately 4 gallons of waste.

In the Building #4 HWCAA, I observed:

- Four 1-gallon HWACs of waste ACN (Attachment 7, Photograph 8). The HWACs were structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and dated December 8, 2024.

In the Building #3 HWCAA, I observed:

- One 5-gallon HWAC of ACN (Attachment 7, Photographs 9 and 10). The HWAC was structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and dated February 4, 2025. It held approximately 4 gallons of waste.

In the MAC Building I observed:

- Five 5-gallon HWACs of ACN (Attachment 7, Photograph 26). The HWACs were structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and dated December 16, 2024. They were all full.

I noted no deficiencies related to management of waste ACN during the CEI

Waste batteries are generated during equipment maintenance. Kemin manages all waste batteries as universal waste according to provisions of 40 CFR Part 273. The facility generates approximately 4 pounds of waste batteries per month. Waste batteries are accumulated in universal waste accumulation containers and transported to Veolia Technical Solutions in Menomonee Falls, Wisconsin, for recycling.

During the CEI, I observed a waste battery container in the MAC Building maintenance shop (Attachment 7, Photograph 28). The container was structurally sound, labeled with the words “universal waste” and “batteries,” dated August 27, 2024, and held approximately 25 gallons of waste batteries. I noted no deficiencies related to management of waste batteries during the CEI.

Rosemary biomass is generated from the encapsulation process. Kemin generates approximately 116,667 pounds of rosemary biomass per month. The facility considers rosemary biomass to be nonhazardous waste based on product and process knowledge. The waste is accumulated in a 30-cubic-yard container and is collected by Waste Management for disposal at the Metro Park East Landfill in Mitchellville, Iowa, under a Special Waste Authorization (SWA). A copy of the SWA is in Attachment 18. During the CEI, I observed accumulation of rosemary biomass and noted no deficiencies or concerns.

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 Waste Management for disposal at the Metro Park East Landfill in Mitchellville, Iowa. 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 Areas

Kemin maintains six HWCAA—one each in Building #2, Building #4, Building #3, Building #5, Building #8, and the MAC building. The HWCAA in Building #5 was empty at the time of the CEI. According to Mr. Tichy, all HWCAAs are inspected weekly and a log is maintained. I reviewed 3 years of inspection logs and noted no missed inspections. A copy of the inspection log for February 14, 2025, is included as Attachment 19. I asked Mr. Tichy how a worker would summon emergency assistance. He stated that all of the workers who handle hazardous waste carry a two-way radio.

Manifests and Biennial Report

Kemin generated manifests for 99 hazardous waste shipments from February 18, 2022, to February 18, 2025. During the CEI, I reviewed manifests and LDR notifications for five shipments in 2022, five in 2023, five in 2024, and two in 2025. Copies of the manifest and LDR notifications for shipments dated December 12, 2024, and January 30, 2025, are in Attachment 20. The facility submitted its 2023 Hazardous Waste Biennial Report on February 28, 2024 (Attachment 8). I noted no deficiencies during my review of manifests and the biennial report.

6. 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. Tichy, Kemin is the subject of a regular inspection by the Des Moines 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 HWCAAs, 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. Specifically, the

Contingency Plan included a description of actions needed to respond to fires, explosions, and spills, a description of arrangements with the local emergency agencies, a list of emergency response equipment (including capabilities and location), and a complete evacuation plan. The Contingency Plan included the names and telephone numbers of the primary and alternate emergency coordinators. The contingency plan was last updated on July 17, 2024. A copy of the Quick Reference Guide is included as Attachment 21. I noted no concerns with content of the facility's Contingency Plan and Quick Reference Guide.

7. 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. Jennings 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 6 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. Jennings who conducts the training. He stated that all training is performed in-house or online and that he has conducted the in-house training for the last 2 years. I asked Mr. Jennings what training he has received. He provided copies of his training certificates for 2023, 2024 and 2025 (Attachment 22).

I randomly selected two waste handling personnel (Francisco Padilla and Lindsay McCroskey) and asked to review RCRA training records for them. Copies of the training records for Francisco Padilla and Lindsay McCroskey are included in Attachment 23. I noted that Mr. Padilla did not receive training in 2022 and asked Mr. Jennings about this. Mr. Jennings explained that Mr. Padilla did not start handling hazardous waste until 2023. I reviewed the written job description for Mr. Tichy and did not note any deficiencies. A copy of the Job Descriptions for Safety and Environmental Engineer and Campus Utility 2 positions are included in Attachment 24 as examples. I noted no concerns with personnel training requirements during the CEI.

8. 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. Kemin 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. Kemin 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 Kemin 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.

9. Summary of Preliminary Findings

In summary, as part of the CEI, I made the following preliminary findings:

- (1) Failure to label a SAC with an indication of the nature of the hazard as required by 40 CFR 262.15(a)(5)(ii) (**NOPF No. 1**)

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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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. Notice of Preliminary Findings (1 page)
5. Site Map (1 page)
6. Google Earth Aerial Photograph (1 page)
7. Photographic Documentation (Photolog and 28 Photographs) (17 pages)
8. Copy of 2023 Biennial Report (51 pages)
9. Copy of SDS for Sulfuric Acid Concentrate (8 pages)
10. Copy of SDS for Ethanol 190 proof (8 pages)
11. Copy of SDS for Toluene (9 pages)
12. Copy of SDS for Acetone (13 pages)
13. Copy of SDS for n-Heptane (8 pages)
14. Copy of SDS for Hexane (13 pages)
15. Copy of SDS for Nelson Colour Reagent (12 pages)
16. Copy of SDS for Acetonitrile (13 pages)
17. Copy of SDS for Sal CURB ASF Liquid (8 pages)
18. Copy of Special Waste Authorization (4 pages)
19. Copy of Inspection Log for February 14, 2025 (1 page)
20. Copies of Manifests and LDRs for Shipments on December 12, 2024, and January 30, 2025 (12 pages)
21. Copy of Quick Reference Guide (6 pages)
22. Copies of Dan Jennings Training Records (3 pages)
23. Copies of Lindsay McCroskey and Francisco Padilla Training Records (4 pages)
24. Copies of Job Description for Safety and Environmental Engineer and Campus Utility 2 (4 pages)