REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

VAN DIEST SUPPLY COMPANY
1434 220th Street
Webster City, Iowa 50595
(515) 832-7091

EPA RCRA ID No. IAD005314117

ON

May 9-10, 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 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 Van Diest Supply Company (VDSC), at 1434 220th Street, Webster City, 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, used oil, and universal waste requirements as applicable. This report and its attachments present the findings of the CEI.

PARTICIPANTS

VDSC:

Jim Piaszynski, Director of Environmental Compliance
Carl King, Environmental Engineer
Lee Trask, Vice President of Manufacturing (entry and exit briefing only)
Leland Conley, title not obtained
Dustin Elliott, Assistant Director of Logistics (exit briefing only)
Mark Davis, Manufacturing Coordinator (exit briefing only)

Toeroek Team:

John D. Dixon, Inspector, (703) 473-8717

INSPECTION PROCEDURES

Prior to the CEI at VDSC on May 9, 2023, I conducted a drive-by visual inspection. I did not observe any areas of concern during the drive-by. Upon my arrival, I approached the main office along 220th Street. I introduced myself and explained the purpose of the CEI to an attendant, who directed me to the security checkpoint at the truck entrance east of the facility along Estes Avenue. I arrived at the security checkpoint and explained the purpose of the CEI to the guard. The security guard issued a visitor's badge to me and asked me to wait while she attempted to contact Mr. Piaszynski. Mr. King arrived at the security checkpoint within 10 minutes and escorted me to a conference room in his office building where conducted an entry briefing with Messrs. Piaszynski, King, and Trask.

During the entry briefing, I presented my business card and EPA credentials to Messrs. Piaszynski, King, and Trask. I explained the scope and procedures for the CEI. I explained the facility's right to make confidentiality claims and provided a Notice Regarding Proprietary/ Confidential Business Information. I stated that at the conclusion of the CEI, they would be presented with a Confidentiality Notice (Notice) with which they could make or not make a claim of confidentiality for the facility. I also provided Messrs. Piaszynski, King, and Trask 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 the facility 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 (provided via e-mail immediately following the inspection)
- Notice Regarding Proprietary/Confidential Business Information
- U.S. EPA Small Business Resources Information Sheet
- Chemical Facility Anti-Terrorism Standards
- E-Manifest Fact Sheet: Generators
- Managing Your Hazardous Waste: A Guide for Small Businesses
- Part 279 Requirements: Used Oil Management Standards
- EPA Region 7 Emergency Response Program
- Recycling Electronics: A Guide for Businesses
- Battery Recycling/Disposal
- Management of Fluorescent Lamps for Businesses
- Incompatible Chemicals
- Universal Wastes – Including Aerosol Cans
- TCLP – Toxicity Characteristic Leaching Procedure
- Iowa Environmental Guide for Businesses

I reviewed the Notification Acknowledgement/Verification Report (Verification Report) with Mr. Piaszynski (Attachment 1). Based on this review, as well as observations during the CEI, I made no edits or updates to the Verification Report.

I conducted the majority of visual inspection and the records review on May 9, 2023, accompanied by Messrs. Piaszynski and King. Mr. Conley participated during the visual inspection at Buildings 12, 20, and 21. During the records review, I reviewed facility documentation such as inventory records, waste tracking spreadsheets, inspection logs, RCRA Contingency Plan, training records, shipping records, and hazardous waste determination records. I prepared and completed a site-specific inspection checklist to document my observations.

I completed the visual inspection and conducted an exit briefing on May 10, 2023, with Messrs. Piaszynski, King, Trask, Conley, Elliott, and Davis. During the exit briefing, I provided a Receipt for Documents and Samples, which Mr. Piaszynski signed, acknowledging receipt (Attachment 2). I provided Mr. Piaszynski the Notice, which he signed indicating no confidential business information had been provided (Attachment 3). I also provided Mr. Piaszynski a Notice of Preliminary Findings (NOPF), which he signed to acknowledge receipt (Attachment 4).

Maps of the facility were obtained during the CEI and are in Attachment 5. An aerial photograph of the facility was downloaded after the CEI and is in Attachment 6. The 55 photographs taken during the CEI are in Attachment 7; of these, 52 are discussed in this report.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

VDSC is a toll manufacturer of herbicide products for several national and international chemical companies. The facility also manufactures herbicide products sold under its own Cornbelt label. VDSC's capabilities include product development; formulation process development; small-volume and large-scale formulation; and product storage, packaging, and distribution.

VDSC manufactures a variety of herbicide products in several forms—including spray-dried; suspension/emulsion concentrates; and extruded, water-dispersible granule herbicides. Raw materials (including active ingredients such as 2,4-dichlorophenoxyacetic acid [2,4-D] and pendimethalin, and various inert ingredients) are received at the facility primarily by truck. These materials are blended or reacted in batch processes to formulate the desired herbicide products. Final products are packaged and warehoused at the facility until distribution to dealers or VDSC's distribution centers via company-owned delivery fleet.

Primary wastes generated by the facility are generated by rinsing out raw material and finished products from mixing vessels, aboveground storage tanks (AST), and tanker trucks. The facility segregates wastewater into hazardous and nonhazardous wastewater depending on the materials with which it has come into contact. Hazardous wastewater includes rinse water and water mopped up from the floor in areas or during activities where the wastewater could contact materials or wastes with RCRA characteristic or listed hazardous waste constituents. Hazardous

wastewater is further segregated into two waste streams: wastewater potentially containing the herbicide 2,4-D and similar products or materials (2,4-D-contaminated waste water), and wastewater from rinsing vessels that held the herbicide Prowl H_2O and similar products or materials (Prowl H_2O waste water). Prowl H_2O is a water-based formulation of pendimethalin that contains as an ingredient 1,2-dichloroethane (DCA). The facility considers 2,4-D waste water and Prowl H_2O waste water hazardous based on product and process knowledge. These wastes are accumulated in satellite accumulation containers (SAC), hazardous waste accumulation containers (HWAC), and hazardous waste accumulation ASTs for collection and off-site treatment.

All other wastewaters generated at the facility are considered nonhazardous based on product knowledge, process knowledge, and analytical testing. Nonhazardous wastewater is pretreated in an on-site wastewater treatment plant (WWTP) that utilizes pH adjustment, flocculation, solids removal via filter press, activated carbon filtration, and ammonia stripping. Pretreated wastewater is released to the facility's three-cell treatment lagoon, and ultimately discharged to Boone Creek via a National Pollutant Discharge Elimination System (NPDES)-permitted outfall. The facility considers filter cake generated from the WWTP filter press nonhazardous based on product knowledge, process knowledge, and analytical testing. Nonhazardous waste filter cake is collected for off-site landfill disposal.

Other hazardous herbicide production and cleanout wastes include 2,4-D waste filters, 2,4-D waste solids (tank cleanout solids, personal protective equipment [PPE] and debris), and Prowl H_2O waste solids (filters, PPE, and debris). The facility considers these wastes hazardous based on product and process knowledge.

Retain samples are product samples held at the facility for a specified time period for quality control purposes. After the specified hold times have lapsed, VDSC sends retain samples off site for disposal. In addition, VDSC periodically sends for disposal expired, off-specification, or otherwise unwanted products at a customer's request. The facility considers waste retain samples and waste products containing 2,4-D or Prowl H_2O, or those that exhibit characteristics of ignitability or corrosivity, hazardous based on product knowledge.

Quality testing of raw materials and final products occurs at onsite labs. Testing activities generate spent solvents (including acetone, methanol, ethyl benzene, toluene, xylene, and acetonitrile), which the facility considers hazardous based on product and process knowledge.

Maintenance of the facility's fleet of tanker and delivery trucks is performed on site in the Vehicle Maintenance Shop. Fleet maintenance generates used oil, used oil filters, scrap metal, spent parts washer solvent, and used lead-acid batteries. Used oil generated at the facility is managed according to provisions of Title 40 *Code of Federal Regulations* (40 CFR) Part 279, and is accumulated in a used oil storage tank until collected for off-site recycling. Used oil filters are crushed and drained into the used oil storage tank, and then managed as scrap metal for recycling. Scrap metal is considered excluded from the definition of solid waste per 40 CFR 261.1(c)(9) and 261.4(a)(13) when recycled. VDSC considers spent parts washer solvent generated in the Vehicle Maintenance Shop nonhazardous based on product and process knowledge as the solvent is diesel fuel. Spent diesel fuel parts washer solvent is added to the used oil storage tank when generated. Used lead-acid batteries generated during fleet

maintenance are managed per 40 CFR 266 Subpart G, and are exchanged with the battery vendor for off-site reclamation. Used lead-acid batteries are not discussed further in this report.

Facility maintenance generates waste aerosol cans, waste aerosol can residue, waste lamps, waste batteries, and general trash. Waste aerosol cans are transferred to the Building 8 Parts Room upon generation and are punctured and drained into a 55-gallon SAC. The punctured and drained waste aerosol cans are added to the facility's scrap metal waste stream for recycling. Waste aerosol can residue drained from the punctured cans is considered hazardous based on product and process knowledge. VDSC also maintains a parts washer unit in the Building 8 Parts Room that uses a low flashpoint naphtha solvent; however, the solvent in this unit is replenished as needed and no spent solvent is generated. Waste lamps and waste batteries are managed as universal wastes according to provisions of 40 CFR Part 273 and are accumulated in universal waste accumulation containers until collected for off-site recycling. General trash consists primarily of packaging and office-type refuse. The facility considers general trash nonhazardous based on product and process knowledge, and send the waste off site for landfill disposal.

VDSC began operations at its current location in 1956. The facility includes 52 buildings on 270 acres. VDSC currently employs approximately 450 personnel. Production generally occurs 24 hours per day, 5 days per week, with personnel working one of three shifts with staggered start times. Shipping/Receiving and security operations occur 24 hours per day, 7 days per week.

On July 10-11, 2018, VDSC was inspected by an EPA contractor. During the CEI, the inspector left a preliminary finding for failure to make an adequate hazardous waste determination on waste aerosol can residue, as required by 40 CFR 262.11. This preliminary finding was not repeated during this inspection.

2. RCRA Status

VDSC was identified as a large quantity generator (LQG) of hazardous waste (generating more than 1,000 kilograms [kg] of hazardous waste per month) on the Verification Report provided by EPA (Attachment 1). During the CEI, I confirmed VDSC's LQG status through a review of current operations, interviews with Messrs. Piaszynski and King, and a review of waste disposal records (manifests) and summary reports.

VDSC maintains spreadsheets summarizing all hazardous waste shipments each calendar year. During the CEI, I reviewed manifests for hazardous waste shipments over the previous 3 years as well as the hazardous waste tracking spreadsheets for 2022 and 2023. Based on comparisons to the manifests, I concluded that the hazardous waste tracking spreadsheets appeared to accurately reflect the hazardous wastes shipped off site in 2022 and 2023. Copies of the hazardous waste tracking spreadsheets for 2022 and 2023 to date are in Attachment 8. Copies of the manifests and land disposal restriction (LDR) notifications for the last two hazardous waste shipments, dated March 23 and 28, 2023, are in Attachment 9.

VDSC typically generates hazardous wastes at varying rates throughout the year, depending on seasonal demand, customer requests, and other factors. However, some wastes (for example, 2,4-D waste water and spent lab solvent) are generated at a relatively consistent rate throughout

the year. Based on the 2022 and 2023 hazardous waste tracking spreadsheets, I determined that VDSC generates approximately 40,000 pounds (18,144 kg) of 2,4-D waste water every 1 to 2 months. The generation rate for this hazardous waste alone is well above the LQG threshold of 1,000 kg per month; therefore, I concluded that VDSC is currently operating as a LQG of hazardous waste (D001, D005, D008, D016, D025, D028 characteristic; and F002, F003, F005, U240 listed hazardous wastes) and inspected the facility as such. Based on observations and records reviewed during the visual inspection, I also inspected VDSC as a small quantity handler (SQH) of universal waste (accumulating less than 5,000 kg of universal waste at any time) and a used oil generator.

VDSC accumulates hazardous waste in designated satellite accumulation areas, two hazardous waste container accumulation areas (HWCAA), and two hazardous waste accumulation ASTs. I inspected six satellite accumulation areas, both HWCAAs, and both hazardous waste accumulation ASTs during the CEI.

3. Waste Streams

This section of the CEI report describes 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 my interviews with Messrs. Piaszynski, King, and Conley, the visual inspection, and my review of available documentation.

VDSC maintains a Waste Management Plan that describes waste identification, handling, and disposal procedures employed at the facility to ensure proper management of hazardous, nonhazardous, universal, and other wastes. A copy of the Waste Management Plan is included as Attachment 10.

2,4-D waste water is generated when mixing vessels, tanks, and tanker trucks previously containing 2-4-D products or constituents are cleaned, and when incidental spills are mopped up. The waste also includes liquids pumped from a floor sump in Building 20 (Attachment 7, Photograph 23). The facility considers 2,4-D waste water hazardous (D016, U240) based on product and process knowledge. VDSC accumulates 2,4-D waste water in SACs. Full SACs are transferred to the HWCAA in Building 21 or taken to Building 20 to be pumped into a dedicated hazardous waste accumulation AST (Tank 901) for 2,4-D waste water. Based on the hazardous waste tracking spreadsheets for 2022 and 2023 (Attachment 8), VDSC generates approximately 40,000 pounds of 2,4-D waste water every 1 to 2 months. The waste is transported to Ross Incineration Services in Grafton, Ohio, for incineration. The waste was last collected on March 23, 2023 (Attachment 9, Page 1).

During the CEI, I observed a 55-gallon container of 2,4-D waste water in Building 12 outside the Building 12 lab (Attachment 7, Photograph 8). The container was located outside a window to the lab, and the bungs were secured with padlocks (Attachment 7, Photographs 9 and 10). VDSC considers the container to be a SAC. Messrs. Piaszynski and King explained that operators maintain line-of-sight control of the SAC via the window and physical control of the SAC via the locked bungs. Therefore, the facility considers SAC to be near the point of generation and under control of the operator. I inspected the container as a SAC during the CEI. The SAC was

structurally sound, closed, and labeled with a Chemical Safety Information Sheet (CSIS). The CSIS included the words "hazardous waste," identification of the waste, and an indication of the nature of the hazard. A copy of a CSIS for 2,4-D waste water is in Attachment 11.

I observed a 250-gallon SAC of 2,4-D waste water in Building 12 near the product storage tanks (Attachment 7, Photograph 13). The SAC was at the point of generation, under control of the operator, structurally sound, closed, and held approximately 50 gallons of waste. The SAC was labeled with a CSIS that included the words "hazardous waste," identification of the waste, and indication of the nature of the hazard (Attachment 7, Photograph 14).

The 250-gallon SAC in Attachment 7, Photograph 13, was also labeled with a "Hazardous Waste Collection in Mini-Bulk Authorization" form (Attachment 7, Photograph 15). A copy of this form is in Attachment 12. Mr. Leland explained that operators in the area were beginning a tank cleanout and would be generating more than 55-gallons of 2,4-D waste water during the cleanout. For jobs where more than 55-gallons of hazardous waste will be generated, authorization for use of a 250-gallon SAC is obtained from management. The authorization form is marked with the date the container is delivered to the work area and the date (3 days later) when the container must be removed from the work area. The authorization form is then physically affixed to the accumulation container. I noted no deficiencies with the facility's use of SACs larger than 55-gallons for temporary accumulation of hazardous waste during cleanout jobs.

In Building 20, I observed the 7,138-gallon hazardous waste AST dedicated for accumulation of 2,4-D waste water (Tank 901) (Attachment 7, Photograph 16). The hazardous waste accumulation tank appeared to be structurally sound with no evidence of leaks or spills and within a secondary containment structure. The hazardous waste accumulation tank was labeled with the words "hazardous waste" and an indication of the nature of the hazard (Attachment 7, Photographs 17 and 18). Tank 901 was empty at the time of the CEI according to the operating log posted at the tank, as the tank was pumped empty ("MT") on May 8, 2023 (Attachment 13). I noted no deficiencies with management of 2,4-D waste water during the CEI.

2,4-D waste filters consist of spent production filters contaminated with 2,4-D products or constituents. The facility considers this waste hazardous (D016) based on product and process knowledge. The generation rate varies throughout the year depending on seasonal demand, customer requests, and other factors. Based on the hazardous waste tracking spreadsheets for 2022 and 2023 (Attachment 8), the facility shipped a total of 1,800 pounds of 2,4-D waste filters in 2022 and 2023 to date. The waste is accumulated in SACs, and full SACs are transferred to the Building 21 HWCAA. 2,4-D waste filters are transported to Tradebe Treatment and Recycling in East Chicago, Indiana, for bulking and transportation off site. The waste was last collected on March 28, 2023 (Attachment 9, Page 5).

During the CEI, I observed a 55-gallon SAC of 2,4-D waste filters in Building 12 (Attachment 7, Photograph 11). The SAC was at the point of generation, under control of the operator, structurally sound, closed, and held approximately 25 gallons of waste. The SAC was labeled with a CSIS that included the words "hazardous waste," identification of the waste, and an indication of the nature of the hazard (Attachment 7, Photograph 12).

I observed 17 HWACs in the Building 21 HWCAA (Attachment 7, Photographs 24 through 26). An inventory of the HWCAA at the time of the CEI is included as Attachment 14. Nine of the HWACs held 2,4-D waste filters. Each 55-gallon HWAC of 2,4-D waste filters was structurally sound, closed, full, dated, and labeled with a CSIS that included the words "hazardous waste," identification of the waste, and an indication of the nature of the hazard. The earliest accumulation start date was April 4, 2023. I noted no deficiencies with management of 2,4-D waste filters during the CEI.

2,4-D waste solids consist of tank cleanout solids, waste PPE, and debris contaminated with 2,4-D products or constituents. The facility considers this waste hazardous (D016) based on product and process knowledge. The generation rate varies throughout the year depending on seasonal demand, customer requests, and other factors. Based on the hazardous waste tracking spreadsheets for 2022 and 2023 (Attachment 8), the facility shipped a total of 2,610 pounds of 2,4-D waste solids in 2022 and 2023 to date. The waste is accumulated in SACs, and full SACs are transferred to the Building 21 HWCAA. 2,4-D waste solids are transported to Clean Harbors Environmental Services in Kimball, Nebraska, for incineration. The waste was last collected on January 13, 2023 (Attachment 8, Page 2).

During the CEI, I observed a 55-gallon SAC of 2,4-D waste filters in Building 20 (Attachment 7, Photograph 22). The SAC was at the point of generation, under control of the operator, structurally sound, closed, and held approximately 45 gallons of waste. The SAC was labeled with a CSIS that included the words "hazardous waste," identification of the waste, and an indication of the nature of the hazard.

I observed 17 HWACs in the Building 21 HWCAA (Attachment 7, Photographs 24 through 26). An inventory of the HWCAA at the time of the CEI is included as Attachment 14. Two of the HWACs held 2,4-D waste solids. Each 55-gallon HWAC of 2,4-D waste solids was structurally sound, closed, full, dated, and labeled with a CSIS that included the words "hazardous waste," identification of the waste, and an indication of the nature of the hazard. The earliest accumulation start date was March 31, 2023. I noted no deficiencies with management of 2,4-D waste solids during the CEI.

Prowl H_2O waste water is generated when mixing vessels, tanks, and tanker trucks previously containing Prowl H_2O products or constituents are cleaned, and when incidental spills are mopped up. The facility considers this waste hazardous (D028) based on product and process knowledge. The generation rate varies throughout the year depending on seasonal demand, customer requests, and other factors. Based on the hazardous waste tracking spreadsheets for 2022 and 2023 (Attachment 8), the facility shipped a total of 2,750 pounds of Prowl H_2O waste water in 2022 and 2023 to date. Prowl H_2O waste water is transported to Ross Incineration Services in Grafton, Ohio, for incineration. The waste was last collected on September 28, 2022 (Attachment 8, Page 2).

During the CEI, I observed a 55-gallon SAC of Prowl H_2O waste water in Building 21 (Attachment 7, Photographs 27 and 28). The SAC was adjacent to another SAC for Prowl H_2O waste solids; however, the combined volume of both SACs was approximately 5 gallons. The Prowl H_2O waste water SAC was near the point of accumulation, under control of the operator, structurally sound, and closed. The SAC was labeled with a CSIS that included the words

"hazardous waste," identification of the waste, and an indication of the nature of the hazard. During the CEI, I discussed requirements for satellite accumulation with Messrs. Piaszynski, King, and Conley, specifically the 55-gallon limit for all hazardous wastes collectively within a single satellite accumulation area. They stated that VDSC would employ measures, such as use of smaller accumulation containers, to ensure the total volume of hazardous wastes in satellite accumulation would not exceed 55 gallons.

I observed 17 HWACs in the Building 21 HWCAA (Attachment 7, Photographs 24 through 26). An inventory of the HWCAA at the time of the CEI is included as Attachment 14. One of the HWACs held Prowl H_2O waste water. The 55-gallon HWAC of Prowl H_2O waste water was structurally sound, closed, full, dated April 7, 2023, and labeled with a CSIS that included the words "hazardous waste," identification of the waste, and an indication of the nature of the hazard.

In Building 20, I observed the 7,138-gallon hazardous waste AST dedicated for accumulation of Prowl H_2O waste water (Tank 900) (Attachment 7, Photograph 19). The hazardous waste accumulation tank appeared to be structurally sound with no evidence of leaks or spills and within a secondary containment structure. The hazardous waste accumulation tank was labeled with the words "hazardous waste" and an indication of the nature of the hazard (Attachment 7, Photographs 20 and 21). I did note that the label identified the contents as Tank 900 was empty at the time of the CEI according to the operating log posted at the tank, and has been empty since the tank was pumped out on April 12, 2017 (Attachment 15). According to Mr. King, VDSC has no immediate plans to close Tank 900 as production changes may require its use for bulk accumulation in the future. I noted no deficiencies with management of Prowl H_2O waste water during the CEI.

Prowl H_2O waste solids consists of filters, waste PPE, and debris contaminated with Prowl H_2O products or constituents. The facility considers this waste hazardous (D028) based on product and process knowledge. The generation rate varies throughout the year depending on seasonal demand, customer requests, and other factors. Based on the hazardous waste tracking spreadsheets for 2022 and 2023 (Attachment 8), the facility shipped a total of 1,700 pounds of Prowl H_2O waste solids in 2022 and 2023 to date. Prowl H_2O waste solids are transported to Tradebe Treatment and Recycling in East Chicago, Indiana, for bulking and transportation off site. The waste was last collected on August 3, 2022 (Attachment 8, Page 1).

During the CEI, I observed a 55-gallon SAC of Prowl H_2O waste solids in Building 21 (Attachment 7, Photographs 27 and 28). The SAC was adjacent to another SAC for Prowl H_2O waste water; however, the combined volume of both SACs was approximately 5 gallons. The Prowl H_2O waste solids SAC was near the point of accumulation, under control of the operator, structurally sound, and closed. The SAC was labeled with a CSIS that included the words "hazardous waste," identification of the waste, and an indication of the nature of the hazard. During the CEI, I discussed requirements for satellite accumulation with Messrs. Piaszynski, King, and Conley, specifically the 55-gallon limit for all hazardous wastes collectively within a single satellite accumulation area. They stated that VDSC would employ measures, such as use of smaller accumulation containers, to ensure the total volume of hazardous wastes in satellite accumulation would not exceed 55 gallons.

I observed 17 HWACs in the Building 21 HWCAA (Attachment 7, Photographs 24 through 26). An inventory of the HWCAA at the time of the CEI is included as Attachment 14. Two of the HWACs held Prowl H_2O waste solids. The 55-gallon HWACs of Prowl H_2O waste solids were structurally sound, closed, full, dated, and labeled with a CSIS that included the words "hazardous waste," identification of the waste, and an indication of the nature of the hazard. The earliest accumulation start date was April 7, 2023. I noted no deficiencies with management of Prowl H_2O waste solids during the CEI.

Spent lab solvents are generated from the facility's quality control labs during product and raw materials testing. Solvents used include acetone, methanol, ethylbenzene, toluene, xylene, and acetonitrile. The facility considers spent lab solvents hazardous (D001, D016, D028, F003, F005) based on product and process knowledge. Based on the hazardous waste tracking spreadsheets for 2022 and 2023 (Attachment 8), VDSC generates approximately 300 to 600 pounds of spent lab solvents per month. The waste is accumulated in SACs in the Building 12 lab and transferred to a HWCAA outside of the lab. Full HWACs from the lab HWCAA are transferred to the Building 21 HWCAA. Spent lab solvents are transported to Tradebe Treatment and Recycling in East Chicago, Indiana, for fuel blending. The waste was last collected on March 28, 2023 (Attachment 9, Page 5).

After the CEI, I noticed that the March 28, 2023, manifest and associated LDR notification in Attachment 9 included the F035 listed hazardous waste code instead of F005. The F035 hazardous waste code is for wastewaters, residuals, and spent formulations from wood preserving processes. I ran an E-Manifest report for the date range January 1, 2022, through May 15, 2023 (Attachment 16) and noted that all shipments of spent lab solvents to Tradebe Treatment and Recycling in this date range included the F035 listed hazardous waste code instead of F005. I e-mailed Mr. Piaszynski on May 14, 2023, and asked if he knew why the manifests and LDR notifications included the F035 waste code. He replied that the F005 waste code erroneously became F035 in the waste profile when VDSC changed from Veolia ES Technical Solutions to Tradebe Treatment and Recycling in approximately mid-2017 and the error had not been noticed (Attachment 17).

I determined that VDSC had made a correct hazardous waste determination for spent lab solvent based on the Waste Management Plan (Attachment 10) and 2021 Hazardous Waste Biennial Report (Attachment 18). However, the facility failed to include correct hazardous waste codes on manifests for spent lab solvent, as required by 40 CFR 262.20(a) **(NOPF No. 2)**. I also determined that the facility failed to include correct hazardous waste codes on LDR notifications, as required by 40 CFR 262.17(a)(9) referencing 40 CFR 268.7(a)(2) **(NOPF No. 3)**. These preliminary findings were added to the NOPF form on May 16, 2023, and Mr. Piaszynski was notified via e-mail of their addition at that time.

During the CEI, I observed a flammables cabinet in Building 12 that serves as a HWCAA for spent lab solvent (Attachment 7, Photographs 1 through 3). Inside the cabinet, I observed a 55-gallon HWAC of spent lab solvent (Attachment 7, Photographs 4 through 7). The HWAC was structurally sound, closed, dated April 15, 2023, labeled with a CSIS that included the words "hazardous waste," identification of the waste, and an indication of the nature of the hazard, and held approximately 20 gallons of spent lab solvent.

I observed 17 HWACs in the Building 21 HWCAA (Attachment 7, Photographs 24 through 26). An inventory of the HWCAA at the time of the CEI is included as Attachment 14. Two 55-gallon HWACs and one 30-gallon HWAC in the Building 21 HWCAA held spent lab solvents. The spent lab solvent HWACs were structurally sound, closed, full, dated, and labeled with a CSIS that included the words "hazardous waste," identification of the waste, and an indication of the nature of the hazard. The earliest accumulation start date was April 4, 2023.

Waste retain samples are periodically generated when the facility discards retain samples that have exceeded their quality control hold time. The facility makes hazardous waste determinations on waste retain samples on a case-by-case basis based on product and process knowledge. The generation rate varies depending on production rates. Waste retain samples are containerized and transported to various destination facility such as Tradebe Treatment and Recycling in East Chicago, Indiana, or Clean Harbors in Kimball, Nebraska, for incineration or bulking and transportation off site. I did not observe waste retain samples in accumulation during the CEI.

Waste product is generated when an expired, off-specification, or otherwise unwanted product or material must be disposed. Occasionally, a material or product expires at the facility or quality control testing shows a material or product does not meet customer specifications. When this occurs, VDSC contacts the client to determine what to do with the material or product. Waste product is generated if the client requests disposal of the unwanted material or product. VDSC makes a hazardous waste determination for each waste product or material based on product and process knowledge. The generation rate varies depending on production rates. Waste product is transported to various destination facility such as Tradebe Treatment and Recycling in East Chicago, Indiana, or Clean Harbors in Kimball, Nebraska, for incineration or bulking and transportation off site. I did not observe waste product in accumulation during the CEI.

Waste aerosol cans include empty, damaged, or otherwise unwanted cans of aerosol products such as cleaners, paints, lubricants, and adhesives. New aerosol products are kept in the Building 8 Parts Room. When an employee needs a new aerosol product, the empty or unwanted can is brought to the Building 8 Parts Room and exchanged for a new one. The facility considers waste aerosol cans hazardous (D001) based on product and process knowledge. VDSC personnel puncture all waste aerosol cans received at the Parts Room. Residue drained from punctured cans is accumulated in a SAC beneath the aerosol can puncturing unit, and the punctured cans are added to the scrap metal waste stream. Scrap metal is collected by Scrap Processors of Iowa in Webster City, Iowa, for recycling. According to Mr. King, the waste aerosol can generation rate is not tracked and is unknown.

During the CEI, I observed punctured and drained waste aerosol cans in the scrap metal accumulation containers (Attachment 7, Photographs 46 and 47) and noted no deficiencies.

Waste aerosol can residue consists of residue drained from punctured aerosol cans. The waste is accumulated in a 55-gallon SAC beneath the aerosol can puncturing unit in the Building 8 Parts Room. The facility considers waste aerosol can residue hazardous (D001) based on product and process knowledge. According to Mr. King, the 55-gallon SAC has not yet been filled and the waste has not yet been transported off site.

During the CEI, I observed the aerosol can puncturing unit in the Building 8 Parts Room (Attachment 7, Photographs 44 and 45). The 55-gallon SAC beneath the puncturing unit held approximately 40 gallons of waste. The SAC was at the point of generation, under control of the operator, structurally sound, and labeled with a CSIS that included the words "hazardous waste," identification of the waste, and an indication of the nature of the hazard. However, the lid on the puncturing unit was open. I did not observe a check valve at the puncturing unit's interface with the SAC, or other means of closing the SAC other than the lid of the puncturing unit. Therefore, I determined the facility failed to keep a SAC closed except when actively adding waste, as required by 40 CFR 262.15(a)(4) **(NOPF No. 1)**.

I provided compliance assistance regarding management of SACs to Messrs. Piaszynski and King. During the CEI, VDSC personnel closed the SAC by securing the lid on the aerosol can puncturing unit (Attachment 7, Photograph 49). Personnel also affixed signage to the wall above the aerosol can puncturing unit with instructions to keep the lid closed when not in use (Attachment 7, Photograph 55).

Spent parts washer solvent is generated during replacement of solvent in a parts washer unit in the Vehicle Maintenance Shop. The solvent is diesel fuel and the parts washer is used for general degreasing. The facility considers spent parts washer solvent nonhazardous based on product and process knowledge. According to the Vehicle Maintenance Shop manager, solvent is changed out approximately once every 10 years. Spent solvent is added to a 320-gallon used oil storage tank when generated. I observed the parts washer unit during the CEI and noted no deficiencies.

Nonhazardous wastewater consists of all wastewater that has not been contaminated or potentially contaminated with 2,4-D, Prowl H_2O, or other hazardous products or constituents. The nonhazardous waste determination is based on product and process knowledge. Nonhazardous wastewater is pretreated in an on-site WWTP in Building 38. Wastewater pretreatment includes pH adjustment, flocculation, solids removal via filter press, activated carbon filtration, and ammonia stripping. Pretreated wastewater is released to the facility's three-cell treatment lagoon, and ultimately discharged to Boone Creek via a NPDES-permitted outfall. I did not obtain a generation rate for nonhazardous wastewater or a discharge rate for treated wastewater. During the CEI, I observed the WWTP in Building 38 (Attachment 7, Photograph 29) and noted no deficiencies.

Filter cake is generated during pretreatment of nonhazardous wastewater in Building 38. The waste consists of solids removed from the wastewater stream via a filter press. The facility considers filter cake nonhazardous based on product knowledge, process knowledge, and analytical testing. A copy of a filter cake analytical report, dated June 25, 2021, is included as Attachment 19. Based on the analytical results, the nonhazardous waste determination appears to be adequate. Filter cake is accumulated in 55-gallon containers beneath the filter press and added to the general trash waste stream. Based on tracking records, the facility generates approximately 120,000 pounds of filter cake and general trash per month combined (Attachment 20). The combined waste stream is transported to the Pheasant Point Landfill in Bennington, Nebraska, for disposal. During the CEI, I observed accumulation of filter cake in Building 38 (Attachment 7, Photographs 30 and 31) and noted no deficiencies.

Used oil is generated in the Vehicle Maintenance Shop during routine maintenance of the facility's tanker and delivery trucks. The facility manages used oil according to provisions of 40 CFR Part 279. According to the Vehicle Maintenance Shop manager, the facility generates approximately 250 to 300 gallons of used oil per quarter. Used oil is accumulated in a 320-gallon used oil storage tank and is collected by Jebro Inc. in Sioux City, Iowa, for recycling. Used oil was last collected on January 9, 2023 (Attachment 21).

During the CEI, I observed the 320-gallon used oil storage tank in the Vehicle Maintenance Shop (Attachment 7, Photographs 50 and 51). The used oil storage tank appeared to be structurally sound and was labeled with the words "used oil." I noted no deficiencies with management of used oil during the CEI.

Used oil filters are generated in the Vehicle Maintenance Shop during routine maintenance of the facility's tanker and delivery trucks. According to the Vehicle Maintenance shop manager, the facility generates approximately 10 to 15 used oil filters per week. Used oil filters are hot drained into the 320-gallon used oil storage tank and crushed. The facility considers hot drained and crushed used oil filters nonhazardous based on product and process knowledge. Hot drained and crushed used oil filters are added to the facility's scrap metal accumulation containers for recycling. During the CEI, I observed used oil filters draining into the 320-gallon used oil storage tank in the Vehicle Maintenance Shop (Attachment 7, Photograph 50). I did not observe the used oil filter crusher or crushed used oil filters in scrap metal accumulation containers during the CEI.

Waste lamps consist of 4-foot and 8-foot fluorescent lamps and high intensity discharge (HID) lamps generated during facility maintenance. The facility manages all waste lamps as universal waste according to provisions of 40 CFR Part 273. Waste lamps are accumulated in fiberboard containers in a designated area of Building 8 outside the Parts Room. Based on the number of universal waste accumulation containers used, I estimated the facility generates approximately 800 waste lamps per year. Waste lamps are collected by A-TEC Recycling in Pleasant Hill, Iowa, for recycling.

During the CEI, I observed one 8-foot and three 4-foot universal waste lamps accumulation containers (Attachment 7, Photograph 32). Each universal waste accumulation container was structurally sound, closed, and labeled with the words "universal waste lamps" (Attachment 7, Photographs 34 through 37). The accumulation start date on two of the universal waste accumulation containers (Attachment 7, Photographs 34 and 36) was January 24, 2023. According to Mr. King, this was the date of last collection of waste lamps. The dates on the other two universal waste accumulation containers (Attachment 7, Photographs 35 and 37) were not changed after the January 24, 2023, collection and still showed a date of April 12, 2022. However, according to Mr. King, the facility's primary method of tracking universal waste accumulation times is via a log sheet attached to each universal waste accumulation container to record addition of each waste lamp in each container. Based on the log sheets, the accumulation start dates for the two containers exhibiting the April 12, 2022, date were actually March 1, 2023, and February 6, 2023 (Attachment 7, Photographs 53 and 54). I determined that the log sheets accurately demonstrate the length of time of universal waste accumulation. However, I provided compliance assistance regarding universal waste management and ensuring all extraneous dates are removed from labels when the containers are emptied for reuse.

Waste batteries are generated during equipment maintenance. The facility manages all waste batteries, other than automotive lead-acid batteries, as universal waste according to provisions of 40 CFR Part 273. Waste batteries are accumulated in plastic containers in a designated area of inside the Parts Room. Based on the number of universal waste accumulation containers used, I estimated the facility generates approximately 50 to 100 pounds of waste batteries per year. Waste batteries are collected by A-TEC Recycling in Pleasant Hill, Iowa, for recycling. According to Mr. King, waste batteries were last collected on January 24, 2023, when the waste lamps were also collected.

During the CEI, I observed two universal waste batteries accumulation containers in the Parts Room (Attachment 7, Photograph 38). The universal waste accumulation containers were structurally sound, labeled with the words "universal waste batteries," and dated January 24, 2023 (Attachment 7, Photographs 40 through 43). I noted no deficiencies with management of waste batteries during the CEI.

Scrap metal primarily consists of scrap aluminum and steel generated from facility and equipment maintenance activities, as well as fleet maintenance. Scrap metal also includes hot drained/crushed used oil filters and punctured/drained waste aerosol cans. The facility considers all scrap metal excluded from the definition of solid waste per 40 CFR 261.1(c)(9) and 261.4(a)(13) when recycled. Scrap metal is accumulated in various containers throughout the facility and in an outdoor roll-off container. Scrap metal is collected by Scrap Processors of Iowa in Webster City, Iowa, for recycling. According to Mr. King, the scrap metal accumulation rate is not tracked. Facility personnel estimated the roll-off container is collected monthly. During the CEI, I observed accumulation of scrap metal (Attachment 7, Photographs 46 through 48) and noted no deficiencies.

General trash consists of general office and packaging refuse generated during production and facility maintenance. Filter cake is also added to the general trash waste stream. The facility considers general trash nonhazardous based on product and process knowledge. Based on tracking records, the facility generates approximately 120,000 pounds of filter cake and general trash per month combined (Attachment 20). The combined waste stream is transported to the Pheasant Point Landfill in Bennington, Nebraska, for disposal. During the CEI, I observed general trash accumulation and noted no deficiencies.

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 possibility of a fire, explosion, or spill, and must maintain emergency response equipment. During the CEI, I observed adequate aisle space for emergency response in the Building 21 HWCAA (Attachment 7, Photograph 24), and no evidence of spills or leaks. I observed the sloped, bermed floor of the HWCAA, as well as "no smoking" signs, fire extinguishers, telephones, and spill control materials (granular absorbent material, sorbent booms and shovels) readily available for emergency response. I observed similar emergency response equipment readily available near the Building 12 HWCAA for spent lab solvent, as well as all satellite accumulation areas observed during the CEI.

5. HWCAAs

At the time of the CEI, the primary HWCAA in Building 21 held 17 HWACs. The earliest accumulation start date was March 31, 2023. The Building 12 HWCAA held one HWAC with an accumulation start date of April 15, 2023. All HWACs were structurally sound, closed, and adequately labeled. I noted no accumulation of incompatible wastes, and noted no deficiencies with management of HWACs in HWCAAs during the CEI.

I asked Mr. Conley if the HWCAAs are inspected. He stated that the HWCAAs are typically inspected three times per week. Mr. King explained that the inspection frequency ensures that if an inspection is missed, the RCRA-required HWCAA inspection frequency of once per week is still maintained. HWCAA inspections are documented on checklists. During the CEI, I reviewed inspection checklists for the previous 3 years and noted that at least one inspection was completed each calendar week. Copies of the HWCAA inspection checklists for April and May 2023 for the Building 21 main HWCAA and the Building 12 HWCAA are in Attachments 22 and 23.

6. Hazardous Waste Accumulation ASTs

VDSC has two hazardous waste accumulation ASTs, although one has not been in use since 2017. The other AST, hazardous waste accumulation Tank 901 used for accumulation of 2,4-D waste water, was also empty at the time of the CEI according to the operating log posted at the tank. Tank 901 was pumped empty ("MT") on May 8, 2023 (Attachment 13). I reviewed the operating logs for Tank 901 for the previous 3 years and noted no hazardous waste accumulation for longer than 90 days. Hazardous waste accumulation Tank 900, used for accumulation of Prowl H_2O waste water, was empty at the time of the CEI according to the operating log posted at the tank, and has been empty since the tank was pumped out on April 12, 2017 (Attachment 15).

I asked Mr. Conley if the hazardous waste accumulation ASTs are inspected. He stated that both ASTs are inspected daily, regardless of whether they hold waste, and inspections are documented using checklists. During the CEI, I reviewed inspection checklists for the previous 3 years and noted no missed inspections. Copies of the hazardous waste accumulation AST inspection checklists for Tanks 900 and 901 for April and May 2023 are in Attachments 24 and 25.

7. Manifests, Bills of Lading, Biennial Report

The facility generated approximately 100 manifests over the past 3 years. I reviewed a total of 51 manifests and associated LDR notifications during the CEI (2 from 2021, all 37 from 2022, and all 12 from 2023 to date). Copies of the manifests and associated LDR notifications for the last two shipments, dated March 23, 2023 and March 28, 2023, are in Attachment 9. Copies of the hazardous waste tracking spreadsheets for 2022 and 2023, which include manifest numbers and dates, are in Attachment 8.

After the CEI, I noticed that the manifests and associated LDR notifications for all shipments of spent lab solvents to Tradebe Treatment and Recycling since at least January 1, 2022, included

the F035 listed hazardous waste code instead of F005. Section 3 of this report provides a discussion of spent lab solvent and subsequent preliminary findings related to manifesting.

8. 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 discussed personnel training requirements with Mr. Piaszynski. He explained that all personnel with hazardous waste responsibilities are provided annual Waste Management training, as well as annual Emergency Action Plan/Contingency Plan (One Plan) training. Job titles and training requirements are specified in Section 13 of the facility's Waste Management Plan (Attachment 10). Personnel names and job descriptions linked to each job title are maintained electronically, which I observed during the CEI.

During the CEI, I reviewed training materials (slides) for the annual Waste Management training and One Plan training. I noted that the training material covered topics such as hazardous waste identification, management, and emergency response procedures and equipment applicable to facility operations. I reviewed slides for the annual One Plan training, which also covers emergency response procedures and applicable equipment. I noted no deficiencies with the content of training provided to employees who handle hazardous wastes.

Mr. Piaszynski explained that training documentation (attendance record) is maintained electronically. I reviewed Waste Management and One Plan training documentation for 2021 through 2023 during the CEI and noted no deficiencies. A copy of an Attendance Report for One Plan training during the current 2022/2023 training cycle is included in Attachment 26.

9. Preparedness and Prevention and Contingency Plan

As a LQG, VDSC is required to arrange for emergency response with local emergency agencies, to designate an emergency coordinator (EC) for the facility, and maintain a RCRA Contingency Plan. VDSC maintains a single emergency management document (One Plan), which serves as the RCRA contingency plan. The One Plan was last updated November 15, 2022. A copy of the One Plan (without appendices) is in Attachment 27.

I noted the One 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 with a description of the signals used, as required by 40 CFR 262.17(a)(6) referencing 262.261(a, c, e, and f). The building-specific evacuation maps were appendices to the One Plan and are not included in Attachment 27; however, I reviewed the evacuation maps during the CEI and noted no deficiencies.

The One Plan included the telephone numbers of the primary EC (Mr. Piaszynski) and alternate ECs, as required by 40 CFR 262.17(a)(6) referencing 262.261(d). It also included a Quick Reference Guide, as required by 40 CFR 262.17(a)(6) referencing 262.262(b). The Quick

Reference Guide was an appendix to the One Plan and is not included in Attachment 27; however, I reviewed the Quick Reference Guide and noted no deficiencies.

Mr. King stated that he hand-delivered copies of the November 15, 2022, One Plan to all emergency agencies, as required by 40 CFR 262.17(a)(6) referencing 262.262(a). Copies of signed agreement pages for the local fire, sheriff, and hospital are in Attachment 28.

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. VDSC 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. VDSC 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 VDSC 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.

11. Summary of Preliminary Findings

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

1. Failure to keep a SAC closed except when actively adding waste, as required by 40 CFR 262.15(a)(4) **(NOPF No. 1)**
2. Failure to include correct hazardous waste codes on manifests for spent lab solvent, as required by 40 CFR 262.20(a) **(NOPF No. 2)**
3. Failure to include correct hazardous waste codes on LDR notifications, as required by 40 CFR 262.17(a)(9) referencing 40 CFR 268.7(a)(2) **(NOPF No. 3)**

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.

John D. Dixon Digitally signed by John D. Dixon DN: cn=John D. Dixon gn=John D. Dixon c=US United States l=US United States Reason: Location: Date: 2023-07-05 09:29-05:00

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John D. Dixon
Inspector
CLAENE Group, LLC.

Mike Martin - signing for Amber Whisnant Digitally signed by Mike Martin - signing for Amber Whisnant Date: 2023.07.06 18:22:46 -05'00'

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

Attachments

1. Notification Acknowledgement/Verification Report (1 Page)
2. Receipt for Documents and Samples (1 Page)
3. Confidentiality Notice (1 Page)
4. Notice of Preliminary Findings (1 Page)
5. Site Maps (2 Pages)
6. Google Earth Aerial Photograph (1 Page)
7. Photographic Documentation (55 Photos and Photolog) (33 Pages)
8. Hazardous Waste Tracking Spreadsheets for 2022 and 2023 (2 Pages)
9. Manifests and LDR Notifications for Shipments Dated March 23 and 28, 2023 (6 Pages)
10. Waste Management Plan (20 Pages)
11. CSIS for 2,4-D Waste Water (1 Page)
12. Hazardous Waste Mini-Bulk Authorization Form (1 Page)
13. Tank 901 Operating Log May 2023 (1 Page)
14. Inventory of Building 21 HWCAA (1 Page)
15. Tank 900 Operating Log 2017 (1 Page)
16. E-Manifest Report from January 1, 2022 to May 15, 2023 (21 Pages)
17. E-Mail RE: Spent Lab Solvent Waste Codes (1 Page)
18. 2021 Hazardous Waste Biennial Report (10 Pages)
19. Filter Cake Analytical Report Dated June 25, 2021 (17 Pages)
20. Filter Cake and Trash Tracking Log 2023 (1 Page)
21. Used Oil Bill of Lading Dated January 9, 2023 (1 Page)
22. Building 21 HWCAA Inspection Checklist April and May 2023 (2 Pages)
23. Building 12 HWCAA Inspection Checklist April and May 2023 (2 Pages)
24. Tank 901 Inspection Checklist April and May 2023 (2 Pages)
25. Tank 900 Inspection Checklist April and May 2023 (2 Pages)
26. One Plan Training Record for 2022/2023 Training Cycle (2 Pages)
27. One Plan (43 Pages)
28. Emergency Agency Agreements (3 Pages)