



United States Environmental Protection Agency
Region 7
Enforcement and Compliance Assurance Division

Air Branch

**Air Branch Inspection Report
Unannounced Full Compliance Evaluation**

Barton Solvents, Inc.
1970 NE Broadway Avenue
Des Moines, IA 50313
FRS # 110000412982

Inspection Date(s):
December 10, 2024

Hunter Strom, Inspector, ECAD, Air Branch

Authorized for Release by:

Jodi Bruno, Air Branch Manager, ECAD

11201 Renner Boulevard
Lenexa, Kansas 66219

CONTENTS

INSPECTION OVERVIEW	3
INSPECTION OBJECTIVE	3
FACILITY CONTACT INFORMATION	3
FACILITY OVERVIEW	3
FACILITY OPERATIONS SUMMARY	4
FIELD ACTIVITIES SUMMARY	5
Measurement Activities	6
INSPECTION OBSERVATIONS	6

TABLES

Table 1. APPLICABLE REGULATIONS AND STANDARDS	Error! Bookmark not defined.
Table 2. INSEPCTION TEAM MEMBERS.....	3
Table 3. FACILITY CONTACT INFORMATION	3
Table 4. FACILITY CONSTRUCTION PERMITS.....	4
Table 5. SOLVENT STORAGE TANKS SUBJECT TO 40 CFR PART 60 SUBPART Kb.....	4
Table 6. FIELD MEASUREMENTS ACTIVITIES.....	6

APPENDICES

- A – Confidential Business Information (CBI) Form (1 page)
- B – Field Photographs (11 pages)
- C – FLIR Videos (2 pages)
- D – Receipt for Documents (1 page)

**This Contents page shows all the sections contained in this report
and provides a clear indication of the end of this report.**

INSPECTION OVERVIEW

INSPECTION OBJECTIVE

The objective of the full compliance evaluation (FCE) inspection was to determine compliance of the facility with the Clean Air Act (CAA), specifically those requirements listed in **Table 1**. The inspection was part of the U.S. Environmental Protection Agency's (EPA) Reducing Air Toxics in Overburdened Communities National Enforcement Compliance Initiative (NECI).

Table 1: APPLICABLE PERMIT CONDITIONS, REGULATIONS AND STANDARDS

Table 1. APPLICABLE PERMIT CONDITIONS, REGULATIONS AND STANDARDS	
Code of Federal Regulation	Standard Name
40 CFR Part 60	Subpart A, General Provisions; Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, and On or Before October 4, 2023

Table 2: PROJECT TEAM MEMBERS

Table 2. PROJECT TEAM MEMBERS		
Team Member	Organization	Project Role
Hunter Strom	EPA Region 7, ECAD, Air Branch	Lead inspector
Jennifer Bradley	Polk County Public Works, Air Permit Engineer	Inspection team member

FACILITY CONTACT INFORMATION

Table 3: FACILITY CONTACT INFORMATION

Table 3. FACILITY CONTACT INFORMATION		
Name, Title	Phone No.	Email Address
Justin Eastman, Operations Manager	515-265-8251	jeastman@barsol.com
Konner Kacmarynski, Regulatory Compliance Coordinator	515-265-7998	konnerk@barsol.com
Dan Kruse, EHS Auditor	515-265-7998	dank@barsol.com
Dan Milczski, Branch Manager	515-265-7900	danmi@barsol.com

FACILITY OVERVIEW

Barton Solvents, Inc. (Barton Solvents) is open Monday through Friday, and operational hours are 7:00 a.m. to 5:00 p.m. The facility employs 32 people.

The last onsite compliance monitoring activity at the facility was on September 28, 2023, and consisted of a FCE inspection conducted by the Polk County Public Works (Polk County).

According to EPA's [Enforcement and Compliance History Online](#) (ECHO) website, there has been no formal enforcement at this facility for at least the past five years. EPA issued the following informal enforcement notifications to the facility:

EPA conducted a Compliance Evaluation Inspection for the Resource Conservation and Recovery Act (RCRA) on March 9, 2021. The entry in ECHO states the inspection revealed violations or compliance issues, and EPA issued an informal written notice.

According to the Barton Solvents Construction Permits (Permit numbers 3415, 3416, 3417, 3418, 3419, 3420, 3421, and 3422), issued by Polk County on October 28, 2019, the facility is subject to the regulations and standards subject to review during this inspection as noted in **Table 4**. Furthermore, Polk County also issued the facility the following Construction Permits:

Table 4: FACILITY CONSTRUCTION PERMITS

Table 4. FACILITY CONSTRUCTION PERMITS		
Permit Number	Issue Date	Project Undertaken
2021	April 8, 2008	Drum Filling, Emission Unit (EU) 78
2022	April 8, 2008	Tank Truck Filling, EU 79
2153	October 12, 2009	Tecor, Inc. Finish Pro Drum Paint Booth, EU 80
2624	January 17, 2014	Drum Transfer Operation, EU 81

FACILITY OPERATIONS SUMMARY

Barton Solvents receives chemical shipments via truck and railcar, which they store onsite. The facility has a North American Industry Classification System (NAICS) code of 424690 (other chemical and allied products merchant wholesalers), and a Standard Industrial Classification (SIC) code of 4226 (special warehousing and storage).

The chemicals are then loaded out into trucks to be shipped, Barton Solvents does not perform loadout nor ship products with railcars, they only receive product from them. The facility stores and distributes chemicals from a storage tank farm on the northern end of the facility property. The following listed solvent storage tanks are subject to the requirements of 40 CFR Part 60 Subpart Kb:

Table 5: SOLVENT STORAGE TANKS SUBJECT TO 40 CFR PART 60 SUBPART Kb

Table 5. SOLVENT STORAGE TANKS SUBJECT TO 40 CFR PART 60 SUBPART Kb	
Tank Number	Rated Capacity (gallons)
EU B-51-19	15,000
EU B-54-19	30,000
EU B-55-19	30,000
EU B-56-19	30,000
EU B-57-19	30,000
EU B-58-19	30,000
EU B-59-19	30,000
EU B-60-19	30,000

FIELD ACTIVITIES SUMMARY

I arrived at the facility on October 10, 2024, at 9:30 a.m. and completed a drive by surveillance inspection. I did not observe visible emissions. I made entry at the front office at 9:40 a.m. and introduced myself and members of the inspection team, presented my credentials, and provided my business card to Dan Milczski, who gave a facility safety briefing. I conducted an opening conference during which I explained that the purpose of the visit was to conduct an inspection to determine compliance with the CAA, specifically, to determine compliance with the regulations and standards listed in **Table 1**. I explained that after asking for some general business information, I would observe process units, emission units, and control equipment and review associated records demonstrating compliance with the permits and regulation. I explained to everyone present for the opening conference that the facility would have an opportunity to make a claim of business confidentiality at the end of the inspection and provided them with a CBI form. Mr. Milczski did not make a claim of confidentiality (**Appendix A**).

At 10:33 a.m. we left the conference room in the front office for a tour of the facility. The inspection team was given a facility tour by Messrs. Eastman, Kruse, and Milczski. I was instructed by Mr. Kruse the only personal protective equipment (PPE) I needed to wear would be steel-toe boots, but to stay close to the facility personnel as part of the safety instructions. We began the facility tour at the storage tanks, then walked to the loadout area, then packaging, followed by the coating operations and the warehouse. During the facility tour, I also conducted optical gas imaging of the storage tanks and truck loadout with a FLIR GF320.

We returned to the conference room from the facility tour at 11:27 a.m. and discussed plans for the rest of the afternoon after we returned from lunch. We broke for lunch at 12 p.m. and returned to the inspection at 1 p.m. Ms. Bradley informed us she would not return for the records review and closing conference portion of the inspection.

Upon returning, I began records review. Mr. Kacmarynski assisted with showing me records that are kept digitally. Otherwise, I reviewed paper records alone in the conference room of the front office. After the onsite records review, I asked Messrs. Eastman, Kruse, and Milczski to rejoin me for the closing conference. I was informed Mr. Milczski had to leave for another meeting and would not be present for the closing conference. I obtained copies of the records as indicated on the Receipt for Documents (**Appendix D**).

I conducted a closing conference with Messrs. Eastman and Kruse. I provided the facility with copies of the CBI form and Receipt for Documents. I did not leave a Notice of Potential Findings (NOPF). I departed the facility at 3:50 p.m.

Observations from the facility tour, records review, and measurement activities are noted in the **Investigation Observations** section below.

Measurement Activities

I conducted field measurements during the onsite inspection. All environmental measurement activities were performed in accordance with the EPA Region 7 quality system.

Table 6: FIELD MEASUREMENT ACTIVITIES

Table 6. FIELD MEASUREMENT ACTIVITIES			
Location Identifier	Date(s) and Time	Method and/or Procedure ¹ , and Equipment	Measurer Name
Tank Farm	12/10/24	Region 7 Procedure: FLIR ThermoCAM™ GasFindIR, GF320, and Similar Infrared Cameras, Equipment: FLIR, Model No. GF320, Serial No. 44401229	Hunter Strom
Tank Farm	12/10/24	Region 7 Procedure: FLIR ThermoCAM™ GasFindIR, GF320, and Similar Infrared Cameras, Equipment: FLIR, Model No. GF320, Serial No. 44401229	Hunter Strom
Tank Farm	12/10/24	Region 7 Procedure: FLIR ThermoCAM™ GasFindIR, GF320, and Similar Infrared Cameras, Equipment: FLIR, Model No. GF320, Serial No. 44401229	Hunter Strom
Loadout	12/10/24	Region 7 Procedure: FLIR ThermoCAM™ GasFindIR, GF320, and Similar Infrared Cameras, Equipment: FLIR, Model No. GF320, Serial No. 44401229	Hunter Strom
Loadout	12/10/24	Region 7 Procedure: FLIR ThermoCAM™ GasFindIR, GF320, and Similar Infrared Cameras, Equipment: FLIR, Model No. GF320, Serial No. 44401229	Hunter Strom
¹ The current version of each procedure, at the time of the investigation, was followed.			

INVESTIGATION OBSERVATIONS

Ambient weather, site conditions, and field activities were documented in the field records. All photographs are attached as **Appendix B**. I made the following observations during the

inspection. I discussed all observations with facility representatives during the closeout meeting unless otherwise noted in the observation description.

These observations are not final compliance determinations. The EPA Region 7 Air Branch case review team will make the final compliance determinations based on its review of this report and other technical, regulatory, and facility information.

Routine maintenance inspections of the facility occur weekly and monthly. On site, I reviewed maintenance logs from 2024 for the following dates: September 6, 13, and 19; October 4, 11, 18, 24, and 26; November 1, 11, 8, 15, 21, 28, and December 6. Anytime there was an issue, whomever performed the inspection noted the discrepancy, then initialed, signed, and dated the maintenance form.

The storage tanks on site are fixed tanks with an internal floating tank gauge to track the amount of stored liquid the facility is adding or distributing. For the loading and unloading process, the facility attaches a hose to each trailer and then pumps the liquid either to vehicles for loadout or to the tanks for storage. The facility does not perform loadout into railcars, they only unload liquids from them to be stored. The facility does have operations for both loading and unloading trucks. The facility keeps maximum vapor relief data in an Excel spreadsheet and updates it each time a product is loaded into a tank.

The facility provided me with a packet of tank specifications from Palmer Manufacturing & Tank, Inc. which was dated May 9, 2022. The packet provided information about the tanks such as detailed parts list and welding map. I reviewed the monthly tank vent inspection records from 2024 dated September 27, October 31, and November 24. Whomever performed each inspection signed and dated them all. They also noted any corrective actions if the tanks needed them. The inspection checklist included all the permitted tanks. I also reviewed the internal tank testing from 2024. The testing forms included all permitted tanks with their product, condition, pass/fail, comments, installation, test date, retest (if needed), and the tester. Next, I reviewed the external tank inspections from 2009 and 2017. C & C Welding, Inc. performed the inspection in 2007, and Unified Contracting Services performed the inspection in 2017. Both inspections are American Petroleum Institute (API) certified.

The facility is removing 20 storage tanks and replacing them with 20 new tanks. Tank numbers 33 through 53 are the tanks the facility is replacing, and the new tanks will be painted in the spring of 2025. At the time of the inspection, the first two rows of tanks were being replaced and beginning in March 2025 the four rows after that will be replaced also.

During on site records review, I asked the facility to provide me with five safety data sheets (SDS) representative of tanks actively storing liquid at the time of inspection. The facility

provided the requested records and informed me that every SDS is kept in the front office for ease of access.

While on site, I also reviewed the 2024 current actuals amounts for PM/PM₁₀, HAPs, throughput VOCs, throughput HAPs, throughput paint, and drum transfers. Each parameter was below the permitted operating limits.

During the opening conference, Mr. Eastman explained that the facility only uses one type of paint and one type of solvent for the spray paint booth. I reviewed the SDS for the paint used and confirmed there was only one paint listed. The drum painting logs include the date, paint color, number of drums painted, amount of paint used, amount of thinner used, and number of drums thrown away. Spare filters for the spray-painting booth are kept in a box near where the painting operations take place (**Photo 8**).

Post inspection on December 10, 2024, I emailed Mr. Eastman with a list of records to submit digitally (**Appendix D**). On January 7, 2025, Mr. Eastman responded to me to inform me that he submitted all the requested records. At the time of report submittal, no records have been reviewed.

On February 13, 2024, I emailed Mr. Eastman again requesting copies of the most recent internal tank inspections and specifications for the new tanks the facility is installing to be submitted digitally. Mr. Eastman responded promptly to tell me he would begin working on this request.

End of report.