

# REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

**Construction Trailer Specialists, Inc.**

2535 Rose Parkway  
Sikeston, MO 63801-7193  
(816) 776-3005

EPA ID Number: MOR000038661

On

April 23, 2024

By

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region 7

Enforcement & Compliance Assurance Division (ECAD)

## 1.0 INTRODUCTION

At the request of ECAD, I performed a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Construction Trailer Specialists, Inc. (CTS), located in Sikeston, Missouri, on April 23, 2024. I conducted the inspection under the authority of RCRA Section 3007(a), as amended. During the inspection, I collected the information necessary to determine compliance with the applicable regulatory and statutory requirements. This report and attachments present the results of the inspection. Based on the information obtained during the inspection, I inspected the facility as a Large Quantity Generator (LQG) of hazardous waste, a small quantity handler of universal waste, and a used oil generator. CTS was last inspected for RCRA compliance on May 22, 2019, by the Missouri Department of Natural Resources (MoDNR). No findings or violations were observed or cited as a result of the 2019 MoDNR RCRA inspection.

## 2.0 PARTICIPANTS

CTS:

James Sanders, Plant Superintendent (Since 2015 or 2016)  
Jeff Slinkard, Office Manager (Record Review and Exit Briefing) (Since 12/31/22)  
Russel Burlesan, Maintenance Head (Since 2/20/23)

MoDNR:

Josh Wilkerson, Environmental Program Manager  
Hayden Cassinger, Environmental Program Assistant

U.S. Environmental Protection Agency (EPA):  
Timothy Evans, ECAD (Lead Inspector)  
Koba Butkovich, ECAD

### **3.0 INSPECTION PROCEDURES**

On April 23, 2024, Messrs. Wilkerson, Cassinger, Butkovich, and I arrived at the facility at approximately 8:45 a.m. A drive-by inspection was only possible on the south and east sides of the facility. No apparent issues were observed. Messrs. Wilkerson, Cassinger, Butkovich, and I then proceeded to the facility office and asked for Todd Yates, listed as site contact on the Hazardous Waste Site Information Verification Report for Inspectors form (Attachment 6). Messrs. Wilkerson, Cassinger, Butkovich, and I signed in as visitors and were then introduced to Mr. Yates. Mr. Yates stated that he would have Mr. Sanders meet with us to assist with the inspection. We were introduced to Mr. Sanders and proceeded to a conference room for the in briefing. Mr. Butkovich and I presented our business cards, and I made my credentials visible to Mr. Sanders. Messrs. Wilkerson, Cassinger, and Butkovich were accompanying me as observers. During the in-briefing, I provided a copy of the RCRA Facility Access Information Sheet, March 2013, which provides inspection authority, to Mr. Sanders. I explained my need to collect accurate information and presented Mr. Sanders with a copy of Title 18 U.S. Code, Sections 1001 and 1002. As part of the in-briefing, Mr. Sanders was made aware of CTS's confidentiality rights and informed that a Confidentiality Notice would be provided at the end of the inspection to make, or not to make, any claims. Mr. Sanders acted as the facility representative during the on-site inspection activities.

During the inspection, discussions consisted of wastes generated and waste management practices. Document photocopies and photographs were collected as inspection documentation (see Attachments 1-12, including Photos 1-25).

Messrs. Wilkerson, Cassinger, Butkovich, and I conducted a visual inspection of the following areas:

#### **Maintenance**

Areas Adjacent to and Outside of Maintenance (Flammable Storage Cabinet, Parts Washer, Universal Waste Lamps Accumulation Area)

Mezzanine – Forklift Parts and Castings Storage (Observed by Mr. Wilkerson)

Used Oil Storage – Outside, West Side of Facility

Outside Yard, West Side of Facility – Three 40-foot Shipping Containers

Less Than 90-Day Hazardous Waste Accumulation Area – Outside, West Side of Facility

Hazardous Waste SAA Drum – Outside, West of and Adjacent to Paint Booth

Trailer Wash Bay

Blast Media Bay

Outside Southwest Corner of Facility – Pallet Storage

Outside, South Side of Facility – Donaldson Dust Collection System for Alltra Plasma Cutter

Information collected during the inspection was documented in a bound field note logbook and as discussed below.

The MoDNR document entitled Hazardous Waste Large Quantity Generator Inspection Checklist was used for regulatory reference (Attachment 9).

At the conclusion of the inspection, I summarized the findings and recommendations with Messrs. Slinkard and Sanders. I provided Mr. Sanders with a Confidentiality Notice and Receipt for Documents and Samples (Attachments 3 and 4, respectively) which he signed as acknowledgement of receipt. Mr. Sanders made no confidentiality claims. I provided Mr. Slinkard with a Notice of Preliminary Findings (NOPF) (Attachment 5), which Mr. Slinkard signed as acknowledgement of receipt.

The following inspection documents were provided to CTS:

Inspection Documents

*Confidentiality Notice*

*Receipt of Documents and Samples*

*NOPF*

EPA Compliance Assistance Handouts (Provided by e-mail on April 26, 2024)

*U.S. EPA Small Business Resources*

*EPA Industry Sector Notebooks List*

*EPA Compliance Assistance Centers*

*Security Awareness*

*Chemical Facility Anti-Terrorism Standards*

*RCRA Organic Air Emission Standards for TSDFs and Large Quantity Generators, December 2022, EPA 530-F-22-007*

*Properly Managing Used Oil Filters*

*Overview of 2013 Solvent-Contaminated Wipes Final Rule*

MoDNR Compliance Assistance Handouts (Provided by e-mail on April 26, 2024)

*Universal Waste Attachment – Small Quantity Handler*

*Used Oil – Missouri Department of Natural Resources*

*Large Quantity Generator Inspection Checklist*

I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.1E), unless noted differently. Any federal regulatory citations noted in this report are as adopted by reference in the authorized Missouri regulations.

## **4.0 FINDINGS AND OBSERVATIONS**

### **4.1 General Information/Facility Description**

CTS manufactures trailers for use in, but not limited to, agricultural, scrap steel, construction and demolition, and road building and paving industries. Specific manufacturing lines at CTS include bottom dump, grain and peanut, and end dump trailers. Sheet metal (steel) is cut, bent, welded, blasted, washed, and painted as part of manufacturing.

Aluminum is used at the facility to make trailer fenders. According to Mr. Sanders, 380-500 trailers are built annually. The facility utilizes one approximately 60-foot long, 30-foot tall, and 16-20-foot-wide paint booth. Paint, thinner, hardener, summer and winter accelerators, and solvents are used in the painting process and are received at the facility in containers ranging in size from 5-55 gallons.

The facility consists of one approximately 120,000 square ft. building, located on approximately 30 acres of land (See Attachment 2 for facility diagram and aerial photo). CTS employs approximately 47-48 people. The hours of operation for the facility are 5a.m. to 3p.m., Monday through Thursday and occasionally on Fridays from 5a.m. to 11a.m.

Hazardous waste generated at the facility includes, but is not limited to, hazardous waste paint related material and brake cleaner solvent-contaminated wipes containing tetrachloroethylene. The facility is also a small quantity handler of universal wastes lamps and used oil generator. See Attachment 7 for additional information related to waste streams generated at the facility.

#### **4.2 RCRA Status**

According to the RCRAInfo database, CTS has notified as an LQG of D001 and D035 characteristic hazardous waste and F003 and F005 listed hazardous waste, last notifying on February 13, 2024. I presented Mr. Sanders with a Notification Acknowledgement/Verification Report form for review (Attachment 6). Mr. Sanders indicated that no changes needed to be made to the Notification Acknowledgement/Verification Report form. Based upon the amount and type of hazardous waste generated at CTS, I inspected the facility as an LQG of hazardous waste, a small quantity handler of universal waste, and a used oil generator.

#### **4.3 Changes Since Previous Inspection**

Changes that have occurred at CTS since the previous inspection include, but are not limited to:

- John Hedrick, previous Purchase Manager is no longer employed at CTS.
- Jeff Slinkard assumed the Office Manager position on December 31, 2022.
- Russel Burlesan, Maintenance Head, began employment on 2/20/23.
- For the past 1.5 years, the facility has been in the process of switching out metal halide lamps for light emitting diode (LED) light fixtures.

#### **4.4 Waste Streams and Waste Management**

Information related to waste streams is listed in the Waste Stream Table (Attachment 7). It should be noted that CTS had previously notified the MoDNR of their intent to manage Satellite Accumulation Area (SAA) containers under Federal regulations. Both State of Missouri and Federal SAA container management regulations can be found in the MoDNR document entitled Hazardous Waste Large Quantity Generator Inspection Checklist (Attachment 8).

## **4.5 Areas Visually Inspected and Related Preliminary Findings**

### **4.5.1 Maintenance**

#### **Hazardous Waste Determination Not Conducted, 10 CSR 25-5.262(1), 40 CFR 262.11**

**(NOPF 1)** – During the inspection, I observed at least five aerosol cans missing nozzles, including one damaged can, located in a flammable storage cabinet, north and outside of maintenance, against the west wall of the facility building (Photo 1). I asked Mr. Sanders if he knew whether the cans contained material that would be used. Mr. Sanders was not sure if the cans contained useable material. During the record review, I asked Mr. Sanders if CTS would need to conduct a hazardous waste determination for the damaged aerosol can and aerosol cans missing nozzles. Mr. Sanders indicated that a hazardous waste determination for the and aerosol cans would need to be conducted.

#### **Hazardous Waste Determination Not Conducted, 10 CSR 25-5.262(1), 40 CFR 262.11**

**(NOPF 1 Added After Inspection)** – During inspection of the Maintenance area, I observed an aerosol can of Imperial Supplies, LLC Brake Parts Cleaner sitting on a workbench. I asked Russel Burlesan, Maintenance Head, how the brake cleaner was used at the facility. Mr. Burlesan stated that the aerosol brake cleaner is used with paper wipes for cleaning oil and grease off facility equipment parts. According to Mr. Sanders and Mr. Burlesan, approximately three pounds of paper wipes are used with Imperial Supplies, LLC Brake Parts Cleaner, and a CRC aerosol brake cleaner each month - an estimate for only Imperial Supplies, LLC Brake Parts Cleaner-contaminated paper wipes generated each month was not calculated by CTS. During an MS Teams meeting on May 17, 2024, I asked Messrs. Sanders and Slinkard how long CTS had been using the two aerosol brake cleaners. Mr. Sanders indicated that the two aerosol brake cleaners had been in use along with approximately three pounds of paper wipes, each month, for approximately the past nine years. According to the Safety Data Sheet for Imperial Supplies, LLC Brake Parts Cleaner, paper wipes could have the potential to be a D001 characteristic ignitable hazardous waste, if wipes contain free liquid at the point they are considered spent or will no longer be used (Attachment 9). In an e-mail dated May 29, 2024, I asked Mr. Slinkard if CTS would need to conduct a hazardous waste determination for Imperial Supplies, LLC Brake Parts Cleaner-contaminated paper wipes generated at CTS. Mr. Slinkard indicated that a waste determination would need to be conducted for Imperial Supplies, LLC Brake Parts Cleaner-contaminated paper wipes generated at CTS. According to Mr. Sanders, Imperial Supplies, LLC Brake Parts Cleaner-contaminated paper wipes are disposed in the trash. The trash is picked up by Sonny Solid Waste and transported to Lemons Landfill located in Dexter, Missouri.

An e-mail was sent to the facility on May 31, 2024, informing the facility of the additional NOPFs (Attachment 11).

#### **Facility Did Not Use Authorized Hazardous Waste Treatment, Storage or Disposal Facility or Resource Recovery Facility, Revised Statutes of Missouri, Section 260.380.1(7) (NOPF 8 Added After Inspection)**

– During inspection of the Maintenance area, I observed an aerosol can of CRC Brakleen Brake Parts Cleaner sitting on a workbench. I asked Russel Burlesan, Maintenance Head, how the CRC aerosol brake cleaner was used at the facility.

Mr. Burllesan stated that the CRC aerosol brake cleaner is used with paper wipes for cleaning oil and grease off facility equipment parts. According to Messrs. Sanders and Berlesan, approximately three pounds of paper wipes are used with CRC Brakleen Brake Parts Cleaner and Imperial Supplies, LLC Brake Parts Cleaner each month - an estimate for only CRC Brakleen Brake Parts Cleaner-contaminated paper wipes generated each month was not calculated by CTS. See NOPF 1 for additional information related to Imperial Supplies, LLC Brake Parts Cleaner-contaminated paper wipes. During an MS Teams meeting on May 17, 2024, I asked Messrs. Sanders and Slinkard how long CTS had been using the two aerosol brake cleaners. Mr. Sanders indicated that the two aerosol brake cleaners had been in use along with approximately three pounds of paper wipes, each month, for approximately the past nine years. According to the Safety Data Sheet (SDS) for CRC Brakleen Brake Parts Cleaner, product number 05089, 90-100% of the CRC Brakleen Brake Parts Cleaner consists of Tetrachloroethylene/Perchloroethylene (Attachment 10). Tetrachloroethylene, at greater than 10% by volume before use, used in small-scale cleaning or degreasing operations carries an F002 hazardous waste listing when it becomes spent. Therefore, when spent and disposed, CRC Brakleen Brake Parts Cleaner-contaminated paper wipes would be an F002 listed hazardous waste. Additionally, according to Section 13 of the SDS, CRC Brakleen Brake Parts Cleaner-contaminated paper wipes would have the potential to be a D039 characteristic toxic hazardous waste; or if disposed as unused product, either still in the can or punctured and drained with an aerosol can puncturing device, the residual in or from the can would carry a U210 listed hazardous waste code. According to Mr. Sanders, CRC Brakleen Brake Parts Cleaner-contaminated paper wipes are disposed in the trash. The trash is picked up by Sonny Solid Waste and transported to Lemons Landfill located in Dexter, Missouri.

An e-mail was sent to the facility on May 31, 2024, informing the facility of the additional NOPFs (Attachment 11).

#### **4.5.2 Outdoor, Less Than 90-Day Hazardous Waste Accumulation Area**

**Accumulation Start Date Not Marked on Less Than 90-Day Accumulation Drums, 10 CSR 25-5.262(1), 40 CFR 262.34(a)(2) (NOPF 2); Less Than 90-Day Accumulation Drums Not Labelled with the Words “Hazardous Waste”, 10 CSR 25-5.262(1), 40 CFR 262.34(a)(3) (NOPF 3)** – During the inspection, I observed three full 55-gallon drums of hazardous waste paint related material and one ~1/3-full 55-gallon drum of non-hazardous waste paint solids, located outside on westside of facility in the less than 90-day accumulation area (adjacent to paint mix room). The drums were all closed. However, the three drums of hazardous waste paint related material were not marked with accumulation start dates or the words “Hazardous Waste” (Photos 11 and 14). Facility personnel applied “Hazardous Waste” labels with accumulation start dates to the three drums, addressing NOPF 2 and NOPF 3 at the time of the inspection (Photos 12, 13 and 15-18).

#### **4.5.3 Paint Booth – Hazardous Waste Satellite Accumulation Area (SAA) Drum**

**Hazardous Waste Satellite Accumulation Container Not Closed, 10 CSR 25-5.262(1) referencing 40 CFR 265.173(a) (NOPF 4); Hazardous Waste Satellite Accumulation Container Not Labeled with the Words “Hazardous Waste”, 10 CSR 25-5.262(2)(C)3, 40 CFR 262.34(c)(1)(ii) (NOPF 5)** – During inspection of the paint booth SAA, I observed one, approximately 1/3-full SAA 55-gallon drum of what was described as D001, D035, F003, and F005 hazardous waste paint related material (Photo 19). The drum was open and not marked with the words “Hazardous Waste.” Facility personnel closed and bolted the drum ring and applied a “Hazardous Waste” label to the drum, addressing NOPF 4 and NOPF 5 at the time of the inspection (Photos 20 and 23-25).

**Hazardous Waste Not Containerized, 40 CFR 262.34(a)(1)(i) (NOPF 9 Added After Inspection)** – During inspection of the area outside and west of the facility paint booth, adjacent to the hazardous waste paint related material SAA 55-gallon drum, I observed approximately one gallon of gray, white, and black colored material on the wall and floor (Photos 19-24). According to Mr. Sanders, the material was hazardous waste paint and solvent generated as a result of cleaning paint lines and guns. According to Mr. Sanders hazardous waste paint related material routinely consists of paint, thinner, hardener, summer/winter accelerators, and Sherwin Williams R7K5200 solvent used for cleaning paint line and guns. SDSs for products used in the painting process can be found as Attachment 12. CTS also occasionally uses Methyl Ethyl Ketone to clean the paint line and guns. The facility manages and ships the hazardous waste paint related material as a D001, D035, F003, and F005 hazardous waste. It appeared that the method for cleaning paint lines, by purging old paint through a high-pressure line into the 55-gallon SAA drum, could have contributed to the hazardous waste paint related material being released onto the floor and walls. During the inspection, the topic of paint line and gun cleaning options and methods was discussed with the facility.

An e-mail was sent to the facility on May 31, 2024, informing the facility of the additional NOPFs (Attachment 11).

#### **4.5.4 Adjacent to and East of Maintenance – Universal Waste Lamp Accumulation**

**Universal Waste Lamps Stored Greater Than One Year, 10 CSR 25-16.273(1), 40 CFR 273.15(a) (NOPF 6)** - During the inspection, I observed one, black polyethylene 55-gallon drum containing ~15 spent metal halide lamps, located adjacent to and east of maintenance (Photo 2). The drum was labeled “Waste Lamps” and was closed. However, the accumulation start date on the drum, “12-6-22” indicated that lamps had been accumulated greater than one year.

#### **4.5.5 Outside and Adjacent to 40-Foot Storage Trailers, West Side of Facility; Inside Northeast of Paint Booth**

**Universal Waste Lamps Not Stored in Closed Containers, 10 CSR 25-16.273(1), 40 CFR 273.13(d)(1) (NOPF 7)** – During the inspection, I observed four universal waste lamps (spent metal halide lamps with ballast housings and reflectors), located outside, on west side of the facility, in and around 40-foot storage trailers (Photos 4-10).

I also observed one universal waste lamp (spent metal halide lamp including a ballast housing and reflector), located inside and northeast of the facility paint booth (photo not taken). According to Mr. Sanders, spent metal halide lamps would not be put back into use at the facility and would be considered universal waste. Facility personnel added the five universal waste lamps (spent metal halide lamps) to the universal waste lamps drum, shown in Photo 2, addressing NOPF 7 at the time of the inspection.

#### **4.5.6 Records Review and Related Preliminary Findings**

##### **Uniform Hazardous Waste Manifests and Land Disposal Restriction (LDR) Notification Forms**

Prior to arriving at the facility, I had conducted an inspection of electronic manifests from April 2021 through February 2024, using RCRAInfo. During the inspection, Mr. Butkovich reviewed the LDR notification form associated with hazardous waste paint related material.

No apparent issues were observed during review of manifests and LDR notification forms.

##### **2021 Comprehensive Biennial Report**

Prior to arriving at the facility, I was able to review the facility 2021 and 2023 comprehensive biennial reports using RCRAInfo. No apparent issues were observed during review of the 2021 and 2023 comprehensive biennial reports.

##### **Contingency Plan**

During review of the facility's contingency plan the following information was noted:

- Emergency Response Coordinators – Messrs. Sanders and Slinkard are listed as the Primary Emergency Coordinators.
- Emergency Response Equipment – Equipment locations, descriptions, and brief description of use are included for fire extinguishers, absorbent, plastic shovels, and personnel protective equipment (gloves, boots, Tyvek suits, safety glasses and goggles, and respirators). Over pack drums are also referenced as a piece of equipment for use in the event of an unexpected spill or drum rupture.

The facility contingency plan appeared to be complete with no apparent issues.

##### **Familiarize Local Authorities**

Mr. Slinkard provided documentation showing that the facility contingency plan and evacuation plan had been provided to the Sikeston Department of Public Safety, which consists of the Sikeston Police and Fire Departments.

The Scott County Ambulance District was also provided with the facility contingency plan and evacuation plan. According to Mr. Slinkard's e-mail to the Sikeston Department of Public Safety and Scott County Ambulance District, the type of injuries/illnesses that could be anticipated include but are not limited to, burns, fractures, heat illness.

The emergency Response Plan was shared with emergency response agencies on April 24, 2024.

### **Preparedness and Prevention**

During the inspection, I noted several ABC-rated fire extinguishers throughout the facility had been inspected by Marmic Fire and Safety Co., Inc. in January of 2024. Fire extinguishers had been checked by facility personnel in March of 2024.

The plant is also equipped with an indoor sprinkler/fire suppression system. However, testing and inspection documentation related to the sprinkler/fire suppression system was not reviewed during the inspection.

Absorbent material/bentonite clay was observed to be available and in use within the facility.

No apparent issues were observed during review of emergency equipment or preparedness and prevention documentation.

### **Communication Devices and Alarms**

The facility is equipped with an internal emergency communication system with a paging system and facility loudspeaker. Cell phones are also used for communication by facility personnel.

### **Personnel Training**

Personnel training has been provided by Jeff Slinkard since Mr. Slinkard assumed his position with the facility in 2022. However, according to Mr. Slinkard, an outside contractor will be used for future personnel training. Topics covered within the training material include, but are not limited to:

- Hazardous waste requirements
- Contingency Plan
- Painting process
- Managing Universal Waste Mercury-Containing Equipment (Safety ToolBox Talks)

No apparent issues were observed during review of the facility Personnel Training Plan.

### **Position Descriptions and RCRA Training Associated with Positions**

During review of records, the following position descriptions are associated with hazardous waste management and handling:

- Plant Superintendent
- Maintenance
- Paint Lead
- Painters
- Shipping/Receiving

#### **4.5.7 Additional Observations**

**Raw Material/Product on Floor, Inside Facility** – During the visual inspection, I observed what was described as incidental spilling of paint product on the floor in the paint mix room and on the west side of the paint booth.

The approximately one gallon of spilled paint I observed within the paint mix room and adjacent to the paint booth appeared to be primarily dry paint. According to Mr. Sanders, the incidental spilling of paint in the mix room and on the west side of the paint booth was due to manually pouring paint into smaller transfer containers, rather than using the system designed to transfer paint from the mix room to the paint booth. Mr. Sanders stated that the equipment used to transfer paint from the mix room to the paint booth was under repair. I observed that equipment used to aid transfer of paint from the mix room to the paint booth was in the process of being repaired.

The SDSs for paint, thinner, hardener, and summer and winter accelerators used at the facility appear to indicate that paint could potentially be a D001 ignitable characteristic hazardous waste when spilled onto the concrete floor in the paint mix room and on the west side of the paint booth (Attachments 12).

## 5.0 SUMMARY

I inspected CTS as an LQG of hazardous waste, small quantity handler of universal waste, and used oil generator. The following preliminary findings were noted as discussed above:

1. Hazardous Waste Determinations Not Conducted, 10 CSR 25-5.262(1), 40 CFR 262.11. (NOPF 1)
2. Accumulation Start Date Not Marked on Less Than 90-Day Accumulation Drums, 10 CSR 25-5.262(1), 40 CFR 262.34(a)(2) (NOPF 2) *Addressed at time of inspection.*
3. Less Than 90-Day Accumulation Drums Not Labelled with the Words “Hazardous Waste”, 10 CSR 25-5.262(1), 40 CFR 262.34(a)(3) (NOPF 3) *Addressed at time of inspection.*
4. Hazardous Waste Satellite Accumulation Containers Not Closed, 10 CSR 25-5.262(1), 40 CFR 265.173(a) (NOPF 4) *Addressed at time of inspection.*
5. Hazardous Waste Satellite Accumulation Container Not Labeled with the Words “Hazardous Waste”, 10 CSR 25-5.262(2)(C)3, 40 CFR 262.34(c)(1)(ii) (NOPF 5) *Addressed at time of inspection.*
6. Universal Waste Lamps Stored Greater Than One Year, 10 CSR 25-16.273(1), 40 CFR 273.15(a) (NOPF 6)
7. Universal Waste Lamps Not Stored in Closed Containers, 10 CSR 25-16.273(1), 40 CFR 273.13(d)(1) (NOPF 7) *Addressed at time of inspection.*
8. Facility did not use authorized hazardous waste treatment, storage or disposal facility or resource recovery facility, Revised Statutes of Missouri, Section 260.380.1(7) (NOPF 8 Added After Inspection)
9. Hazardous Waste Not Containerized, 40 CFR 262.34(a)(1)(i) (NOPF 9 Added after Inspection)

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

**TIMOTHY  
EVANS**

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Timothy R. Evans  
Life Scientist  
ECAD/AB/CAPS, EPA Region 7

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

#### Attachments

1. Digital Image Log (29 pages/25 photos)
2. Aerial Photo and Facility Diagram (2 pages)
3. Confidentiality Notice (1 page)
4. Receipt for Document (1 page)
5. NOPF (2 pages)
6. Notification Acknowledgement/Verification Report Form (2 pages)
7. Waste Stream Table (7 pages)
8. MoDNR Hazardous Waste Large Quantity Generator Inspection Checklist (12 pages)
9. Imperial Supplies, LLC Brake Parts Cleaner SDS (5 pages)
10. CRC Brakleen Brake Parts Cleaner SDS (9 pages)
11. Additional NOPF E-Mail (2 pages)
12. Paint, Thinner, Hardener, and Summer and Winter Accelerator SDSs (112 pages)