

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

JOHN DEERE DES MOINES WORKS

825 SW Irvinedale Drive
Ankeny, Iowa 50023
515-289-3445

EPA ID Number: IAD069624500

On

April 02, 2024

By

TOEROEK ASSOCIATES, INC.

For

U. S. ENVIRONMENTAL PROTECTION AGENCY

Region 7

Enforcement and Compliance Assurance Division

INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division/Chemical Branch/RCRA Section (ECAD/CB/RCRA) of the U. S. Environmental Protection Agency (EPA) Region 7, Toeroek Associates, Inc., and its subcontractor CLAENE Group (Toeroek team) conducted a hazardous waste compliance evaluation inspection (CEI) at John Deere Des Moines (John Deere) at 825 SW Irvinedale Drive, Ankeny, Iowa. The CEI was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. The CEI covered hazardous waste generator requirements, used oil management, and universal waste requirements, as applicable. This report and its attachments present the results of the CEI.

PARTICIPANTS

John Deere:

Scott A. Hemesath, Environmental Engineering Supervisor
Carole Petzenhauser, Operating Manager (Entry Briefing only)
Reed Sanders, Environmental Engineer
Charles Kerman, Environmental Engineer

Toeroek Team:

Clifford Nelles, Inspector, 816-213-5192

INSPECTION PROCEDURES

Prior to the CEI at John Deere on April 02, 2024, I conducted a drive-by visual inspection. I did not observe any areas of concern during the drive-by. At approximately 7:00 a.m., I entered the lobby of the facility and informed the receptionist of my intent to conduct a CEI. The receptionist contacted Mr. Hemesath, who met me in the lobby. After brief introductions, I explained the purpose and scope of the CEI to Mr. Hemesath. Mr. Hemesath and I adjourned to a conference room where I was introduced to Ms. Petzenhauser. I proceeded to conduct an entry briefing with Mr. Hemesath and Ms. Petzenhauser.

During the entry briefing, I presented my business card and EPA credentials to Mr. Hemesath and Ms. Petzenhauser. I explained the scope and procedures for the CEI. I explained the facility's right to make confidentiality claims for any or all the information obtained and provided a Notice Regarding Proprietary/Confidential Business Information. I stated that at the conclusion of the CEI, Mr. Hemesath would be presented with a Confidentiality Notice (Notice) with which he could make or not make a claim of confidentiality for the facility. I also provided Mr. Hemesath and Ms. Petzenhauser 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. Messrs. Sanders and Kerman joined the CEI after the entry briefing.

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

- RCRA Facility Access Information Sheet
- RCRA Section 3007
- U.S. Federal Codes 1001 and 1002
- Notice Regarding Proprietary/Confidential Business Information

The following handouts were emailed to Mr. Hemesath after the CEI.

- E-Manifest Fact Sheet: Generators
- Managing your Hazardous Waste: A Guide for Small Businesses
- U.S. EPA Small Business Resources Information Sheet
- Solvent-Contaminated Wipes Final Rule Summary Chart
- IDNR Excluded Solvent-Contaminated Wipes Rule: Management Practices for Wipes, Rags, and Shop Towels
- Recycling Electronics: A Guide for Businesses
- Lead-Based Paint Activities: Handling and Disposal
- Battery Recycling/Disposal
- Management of Fluorescent Lamps for Businesses
- Incompatible Chemicals
- Universal Wastes – Including Aerosol Cans
- TCLP – Toxicity Characteristic Leaching Procedure
- Part 279 Requirements: Used Oil Management Standards
- EPA Region 7 Emergency Response Program
- Chemical Facility Anti-Terrorism Standards
- Iowa Environmental Guide for Businesses

I reviewed the Notification Acknowledgement/Verification Report (Verification Report) with Mr. Hemesath (Attachment 1). Based on this review, I made no changes to the Verification Report.

I conducted a visual inspection of the facility, accompanied by Messrs. Hemesath, Sanders and Kerman. Following the visual inspection, I reviewed facility records including hazardous waste manifests with land disposal restriction (LDR) notifications, safety data sheets (SDS), contingency plan, inspection records, and training documentation. I prepared and completed a site-specific inspection checklist to document my observations.

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

A map of the facility obtained during the CEI is included in Attachment 4, and a Google Earth aerial photograph of the facility is included as Attachment 5. The 14 photographs taken during the CEI are included in Attachment 6.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

The John Deere facility at Ankeny produces spray rigs and mechanical cotton pickers for agriculture. The majority of the parts used in assembly are produced at offsite locations by other John Deere plants, or various subcontractors, or are obtained through parts suppliers. Some parts are fabricated on site. Operations at the facility include metal cutting and forming, parts cleaning and painting, and assembly of parts into final products.

John Deere is located in a rural and residential area west of Ankeny, Iowa. The facility began operations at this location in 1947. Mr. Hemesath estimated the facility has approximately one million square feet of floor space under roof, in approximately 20 buildings on 450 acres of contiguous property. He stated that the facility employs approximately 1,538 personnel, operating on two shifts (6:00 a.m. to 2:30 p.m., and 3:00 p.m. to 11:30 p.m.) Monday through Friday.

Painting is performed in automated paint booths and at touch-up areas. Painting operations generate waste paint related materials (WPRM), which consists of spent solvent and paint generated during paint gun cleaning and paint line flushing. The facility also uses a dip process for some painting. Cleaning of the paint dip tank generates black dip painting sludge. Painting operations also generate paint cans and debris. John Deere considers WPRM, dip painting sludge, and paint cans and debris to be hazardous based on product and process knowledge.

Facility and equipment maintenance activities generate used oil, paint booth filters, spent parts washer solvent, waste aerosol cans, empty propane cylinders, waste lamps, waste batteries, and general trash. Used oil is managed according to provisions of Title 40 *Code of Federal Regulations* (40 CFR) Part 279. Paint booths filters and spent parts washer solvent are considered nonhazardous based on product and process knowledge. Waste aerosol cans and empty propane cylinders are considered hazardous based on product and process knowledge. Waste lamps and waste batteries are managed as universal wastes according to provisions of 40 CFR Part 273. General trash is considered nonhazardous and is collected for landfill disposal at the Metro Park West Landfill in Perry, Iowa.

John Deere was last inspected by an EPA contractor on December 16, 2020, with a preliminary finding for accumulation of more than 55 gallons of hazardous waste in a single satellite accumulation area. The preliminary finding was not repeated during this CEI.

2. RCRA Status

The Verification Report (Attachment 1) indicates that John Deere is registered with EPA, under EPA ID IAD069624500, as a large quantity generator (LQG) of hazardous waste, generating more than 1,000 kilograms (kg) or 2,200 pounds of hazardous waste per month. I confirmed the facility's generator status through review of the facility's 2023 hazardous waste biennial report, current operations, interviews, and review of waste disposal records.

John Deere's 2023 hazardous waste biennial report (Attachment 7) includes a total of 78,668 pounds (35,683 kg) of hazardous waste. This quantity of hazardous waste is significantly higher than 2,200 pounds (1,000 kg) per month. Based on the biennial report and observations during the CEI, I inspected John Deere as a LQG of hazardous waste.

Universal wastes are shipped off site for recycling approximately every six months. Based on the quantities of universal waste lamps and batteries accumulated onsite between shipments, I inspected John Deere as a small quantity handler (SQH) of universal waste (accumulating less than 5,000 kilograms [11,000 pounds] of universal waste at any time). I also inspected John Deere as a used oil generator.

3. Waste Streams

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

WPRM consists of spent solvent and paint generated from flushing paint lines in automated paint booths and cleaning of spray gun nozzles at touch-up paint booths. The facility has determined that WPRM is hazardous (D001, D035, F003, F005) based on product and process knowledge. Copies of the SDSs for components of the WPRM (SEP Gray Epoxy Primer, Spectracron F9A Green, Deere AG YEL F9H Brushable NISO C5, and the flushing/cleaning

solvent methyl amyl ketone [MAK]) are included as Attachments 8 through 11. Based on the 2023 Biennial Report (Attachment 7, page 4, GM5), the facility generates approximately 1,341 pounds (610 kg) of WPRM per month. The waste is accumulated in 55-gallon satellite accumulation containers (SACs). Full SACs are transferred to the hazardous waste central accumulation area (HWCAA). The waste is collected by Veolia ES Technical Solutions (Veolia) and transported to Veolia in Menomonee Falls, Wisconsin, for bulking/offsite transfer.

During the CEI, I observed a 55-gallon SAC of WPRM (paint flush) in the maintenance building (Attachment 6, Photograph 12). The SAC was near the point of generation, under control of the operator, structurally sound, labeled with the words “hazardous waste” and an indication of the nature of the hazard, closed, and held approximately 20 gallons of waste.

I also observed 55-gallon SACs of WPRM in the Building 3 paint kitchen, Building 3 touch-up area, and in Building 4. Each SAC was near the point of generation, under control of the operator, structurally sound, labeled with the words “hazardous waste” and an indication of the nature of the hazard, closed, and held between 5 and 20 gallons of WPRM (paint flush).

I observed one 55-gallon hazardous waste accumulation container (HWAC) of WPRM (paint flush) in the HWCAA (Attachment 6, Photograph 9). The HWAC was structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, full, and marked with an accumulation start date of March 24, 2024. I noted no deficiencies with management of WPRM during the CEI.

Black dip enamel sludge is generated from cleaning out the paint dip tank. The facility has determined that black dip tank sludge is hazardous (D001) based on product and process knowledge. Copies of the SDS for Duraspar 440 F9T Black Dip Enamel and Barsol A-4206 solvent are included as Attachments 12 and 13. Based on the 2023 Biennial Report (Attachment 7, page 3, GM2), the facility generates approximately 38,400 pounds (17,455 kg) of black dip enamel sludge per year. The dip tank is cleaned out as needed, at least one time per year. The waste is accumulated in 55-gallon HWACs and is transferred to the HWCAA. The waste is collected by Veolia and transported to Veolia in Menomonee Falls, Wisconsin, for bulking/offsite transfer. I did not observe any black dip enamel sludge in accumulation during the CEI.

Aerosol cans are generated during maintenance of facility equipment and buildings. The facility has determined that waste aerosol cans are hazardous (D001, D035) based on product and process knowledge. Based on the 2023 Biennial Report (Attachment 7, page 3, GM1), the facility generates approximately 59 pounds (27 kg) of aerosol cans per month. The waste is accumulated in 55-gallon SACs, and full SACs are transferred to the HWCAA. The waste is collected by Veolia and transported to Veolia in Menomonee Falls, Wisconsin, for bulking/offsite transfer.

During the CEI, I observed a 55-gallon SAC of aerosol cans in the Building 1 touch-up area (Attachment 6, Photograph 11). The SAC was near the point of generation, under control of the operator, structurally sound, labeled with the words “hazardous waste” and an indication of the nature of the hazard, closed, and held approximately 10 gallons of empty aerosol cans.

I observed a 55-gallon SAC of aerosol cans in the maintenance building (Attachment 6, Photograph 13). The SAC was near the point of generation, under control of the operator, structurally sound, labeled with the words “hazardous waste” and an indication of the nature of the hazard, closed, and held approximately 20 gallons of empty aerosol cans. A 55-gallon SAC of empty propane cylinders was adjacent to the SAC of aerosol cans; however, the combined volume of hazardous waste was approximately 30 gallons between the two SACs. I provided compliance assistance regarding the 55-gallon hazardous waste accumulation limit for satellite accumulation areas.

I also observed 55-gallon SACs of aerosol cans in Building 3 (bays G1 and F23), Building 4, and Building 5. Each SAC was near the point of generation, under control of the operator, structurally sound, labeled with the words “hazardous waste” and an indication of the nature of the hazard, closed, and held between 10 and 15 gallons of empty aerosol cans. I noted no deficiencies with management of aerosol cans during the CEI.

Paint cans and debris are generated by touch-up painting in the touch-up areas of various buildings. The facility has determined paint cans and debris to be hazardous (D001, D035, F003, F005) by product and process knowledge. Based on the 2023 Biennial Report (Attachment 7, page 4, GM4) the facility generates approximately 593 pounds (269 kg) of paint cans and debris per month. The waste is accumulated in 55-gallon SACs, and full SACs are transferred to the HWCAA. The waste is collected by Veolia transported to Veolia in Menomonee Falls, Wisconsin, for bulking/offsite transfer.

During the CEI, I observed a 55-gallon SAC of paint cans and debris in the Building 1 touch-up area (Attachment 6, Photograph 10). The SAC was near the point of generation, under control of the operator, structurally sound, labeled with the words “hazardous waste” and an indication of the nature of the hazard, closed, and held approximately 30 gallons of paint cans and debris.

I also observed 55-gallon SACs of paint cans and debris in Building 3 and Building 5. The SACs were near the point of generation, under control of the operator, structurally sound, labeled with the words “hazardous waste” and an indication of the nature of the hazard, closed, and held approximately 15 gallons of paint cans and debris each.

During the CEI, I observed three HWACs of paint cans and debris in the HWCAA (Attachment 6, Photographs 6 through 8). The HWACs were structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, full, marked with accumulation start date of March 13, 2024. I noted no deficiencies with management of paint cans and debris during the CEI.

Used oil is generated during the maintenance of facility equipment. The facility manages used oil according to provisions of 40 CFR Part 279. According to Mr. Hemesath, John Deere generates approximately 300 gallons of used oil per month. Used oil is collected by Covanta Environmental Solutions for recycling.

During the CEI, I observed a 55-gallon used oil storage container in the Building 1 maintenance shop (Attachment 6, Photograph 4). The container was in good condition with no apparent leaks or damage, held approximately 25 gallons of used oil, and was labeled with the words “used oil.”

I observed six additional 55-gallon used oil storage containers in the Building 1 maintenance shop. The used oil storage containers were in good condition with no apparent leaks or damage, held approximately 55 gallons of used oil, and were labeled with the words “used oil.”

Waste lamps are generated by maintenance personnel replacing spent lamps. The facility manages waste lamps as universal waste according to provisions of 40 CFR Part 273. Waste lamps are accumulated in universal waste accumulation containers at the Building 1 maintenance shop. Based on universal waste shipping documentation, the facility generates approximately 50 pounds of waste lamps per month (Attachment 14). The waste is collected by Veolia and transported to Veolia in Port Washington, Wisconsin, for recycling.

During the CEI, I observed two universal waste lamps accumulation containers at Building 1 maintenance shop (Attachment 6, Photographs 1 through 3). The containers were structurally sound, closed, labeled with the words “used lamps,” and marked with accumulation start dates of January 29, 2024, and March 4, 2024. I noted no deficiencies with management of waste lamps during the CEI.

Waste batteries are generated by maintenance personnel replacing spent batteries. John Deere manages waste batteries as universal waste according to provisions of 40 CFR Part 273. Waste batteries are accumulated in universal waste accumulation containers in the maintenance building and Building 1 maintenance shop. Based on universal waste shipping documentation, the facility generates approximately 42 pounds of waste batteries per month (Attachment 14). The waste is collected by Veolia and transported to Veolia in Port Washington, Wisconsin, for recycling.

During the CEI, I observed a 55-gallon universal waste batteries accumulation container in the Building 1 maintenance shop (Attachment 6, Photograph 5). The container was labeled with the words “used batteries,” held approximately 10 gallons of waste nickel-cadmium and alkaline batteries, and was dated August 31, 2023. I observed another 55-gallon universal waste batteries accumulation container in the maintenance building. The second container was labeled with the words “used batteries,” held approximately 15 gallons of waste nickel-cadmium and alkaline batteries, and was dated February 23, 2024. I noted no deficiencies with management of waste batteries during the CEI.

Paint booth filters are generated when synthetic fiber filters in the touch-up paint booths are changed out. John Deere has determined that waste paint booth filters are nonhazardous based on product and process knowledge. The paint booth filters are inherently dry when changed and spent solvent is not sprayed onto filters during paint gun cleaning. The facility generates approximately 1,000 pounds of paint booth filters per month. Paint booth filters are added to the general trash waste stream, which is collected by Waste Management for disposal at the Metro Park West Landfill in Perry, Iowa. I did not observe paint booth filters in accumulation during the CEI.

Empty propane cylinders are generated from maintenance repairing equipment. The facility has determined the empty propane cylinders to be hazardous (D001) by product and process knowledge. Based on the 2023 Biennial Report (Attachment 7, page 7, GM19) the facility generates approximately 15 pounds of empty propane cylinders per year. The waste is collected by Veolia and transported to Veolia in Menomonee Falls, Wisconsin, for bulking/offsite transfer.

During the CEI, I observed a 55-gallon SAC of empty propane cylinders in the maintenance building (Attachment 6, Photograph 13). The SAC was near the point of generation, under control of the operator, structurally sound, labeled with the words “hazardous waste” and an indication of the nature of the hazard, closed, and held approximately 10 gallons of empty propane cylinders.

Parts washer solvent is generated when the parts washers are serviced approximately every three months by Safety-Kleen. The facility has determined the parts washer solvent to be nonhazardous based on product and process knowledge. A copy of the SDS for Safety-Kleen Premium Solvent, which is used in the parts washers, is included as Attachment 15. Safety-Kleen containerizes spent parts washer solvent during each servicing event and transports the waste off site for recycling. A copy of a bill of lading for parts washer service on March 22, 2024, is in Attachment 16. During the CEI, I observed a parts washer in Building 12, Bay O24 (Attachment 6, Photograph 14) and noted no deficiencies.

General trash consists of office-type refuse, such as waste packaging materials and food containers. The facility has determined that general trash is nonhazardous based on product and process knowledge. General trash is accumulated in several containers throughout the facility and transferred to a 4-cubic-yard roll-off container or compactor. General trash is collected by Waste Management for disposal at the Metro Park West Landfill in Perry, Iowa. During the CEI, I observed accumulation of general trash 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 the possibility of a fire, explosion, or spill, and must maintain emergency response equipment. During the visual inspection, I observed spill response equipment comprised of mats, absorbent materials, shovels, and brooms, as well as the presence and availability of fire extinguishers. I determined that the spill and fire response equipment was adequate for the hazardous wastes generated and accumulated at the facility.

5. Container Accumulation Areas

John Deere maintains one HWCAA at the Building 1 maintenance shop. I observed four 55-gallon HWACs in the HWCAA during the CEI (Attachment 6, Photographs 6 through 9). All HWACs were structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and dated. The earliest accumulation start date was March 13, 2024.

I asked Mr. Hemesath if the HWCAA is inspected. He stated that he and Mr. Kerman conduct inspections of the HWCAA once per week. I asked Mr. Hemesath if he maintained an inspection log and he confirmed that an inspection log is maintained. I reviewed the inspection log and noted no missed inspection weeks. A copy of the HWCAA inspection log from March 6 through March 27, 2024, is included in Attachment 17. I asked Mr. Hemesath how someone would summon emergency assistance in the HWCAA. He stated that all of the workers that handle hazardous waste carry two-way radios.

6. Manifests and Biennial Report

John Deere generated manifests for 103 hazardous waste shipments from April 2, 2021, to April 2, 2024. During the CEI, I reviewed manifests and LDR notifications for five shipments in 2021, five in 2022, five in 2023, and seven in 2024. Copies of the manifests for shipments dated February 27, 2024, March 7, 2024, and March 14, 2024, are included in Attachment 18 as examples. The facility submitted its 2023 Hazardous Waste Biennial Report on February 20, 2024 (Attachment 7). I noted no deficiencies during my review of manifests, LDR notifications, and the 2023 Biennial Report.

7. Preparedness and Prevention Plan

LQG facilities are required by 40 CFR 262.17(a) to meet the emergency preparedness, prevention, and procedures requirements including documented arrangements with response agencies. According to Mr. Hemesath, John Deere is the subject of a regular inspection by the Ankeny Fire Department hazardous materials team. He explained the fire department is shown the layout of the facility, the location of the hazardous waste HWCAA, and other facility features during inspections.

The facility's contingency plan was last updated August 9, 2023. I reviewed the contingency plan against the content requirements of 40 CFR 262.261. I noted the contingency plan included a description of actions needed to respond to fires, explosions, and spills, a description of arrangements with the local emergency agencies, a list of emergency response equipment (including capabilities and location), and a complete evacuation plan 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 contingency plan included telephone numbers of the primary emergency coordinator, Mr. Kerman, and the alternate emergency coordinator, Mr. Hemesath, as required by 40 CFR 262.17(a)(6) referencing 262.261(d). A copy of the contingency plan contact information is included as Attachment 19.

The contingency plan also included a quick reference guide, as required by 40 CFR 262.17(a)(6) referencing 262.262(b). I noted no deficiencies with the facility's emergency preparedness, prevention, and procedures during the CEI, including content of the contingency plan and quick reference guide.

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 asked Mr. Hemesath if hazardous waste training is provided to employees. He stated that hazardous waste management training is provided to all employees who handle hazardous waste within six months of hiring or being assigned to a job that handles hazardous waste. He also stated that annual refresher training is conducted. I asked Mr. Hemesath who conducts the training. He stated that all training is conducted in person by John Deere corporate trainers. I reviewed the training records for the last three years for Messrs. Hemesath, Kerman and Mr. Jeff McKibbin (production worker who handles hazardous waste). Copies of the 2023 training records for Messrs. Hemesath and McKibbin are included in Attachment 20 as examples.

I reviewed the written job descriptions for Messrs. Hemesath, Kerman and McKibbin and noted that they appeared to meet requirements of 40 CFR 262.17(a)(7)(iv). A copy of the job descriptions for positions that require RCRA training is in Attachment 21.

9. 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. John Deere 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. John Deere 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 HWACs. During the CEI, I determined that John Deere meets the Subpart CC requirements for containers by using Container Level 1 controls (HWACs smaller than 122 gallons that are Department of Transportation [DOT]-approved). I noted no concerns with management of hazardous waste per the Subpart CC air emissions requirements.

9. Summary of Preliminary Findings

In summary, as part of the CEI, I made no preliminary findings.

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

Clifford A.
Nelles

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A. Nelles
Date: 2024.05.17
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Clifford A. Nelles, Inspector
CLAENE Group

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

Attachments:

1. Notification/Acknowledgement Verification Report (2 pages)
2. Receipt for Documents and Samples (1 page)
3. Confidentiality Notice (1 page)
4. Site Map (1 page)
5. Google Earth Aerial Photograph (1 page)
6. Photographic Documentation (Photolog and 14 Photographs) (9 pages)
7. Copy of 2023 Biennial Report (9 pages)
8. Copy of SDS for Sep Gray Epoxy Primer (18 pages)
9. Copy of SDS for Spectracron F9A Green (17 pages)
10. Copy of SDS for Deere AG Yel F9H Brushable Niso C5 (17 pages)
11. Copy of SDS for Methyl Amyl Ketone (13 pages)
12. Copy of SDS for Duraspar 440 F9T Black Dip Enamel (24 pages)
13. Copy of SDS for Barsol A-4206 (11 pages)
14. Copy of Manifest for Universal Waste Shipment on January 24, 2024 (2 pages)
15. Copy of SDS for Safety-Kleen Premium Solvent (8 pages)
16. Copy of Safety-Kleen Bill of Lading Dated March 22, 2024 (1 page)
17. Copy of Inspection Log Dated March 6 to March 27, 2024 (2 pages)
18. Copies of Uniform Hazardous Waste Manifests Dated February 27, March 7, and March 14, 2024 (3 pages)
19. Copy of Contingency Plan Contact List (1 page)
20. Copy of Training Records for Scott Hemesath and Jeff McKinnin (3 pages)
21. Copy of Job Description for Personnel Requiring RCRA Training (1 page)