Clean Air Act Compliance Inspection Report

United States Environmental Protection Agency
Region 10 – Seattle, WA

Clean Air Act Full Compliance Evaluation Inspection Report

Western Pneumatics, Inc.

Eugene, Oregon

Inspection Date: September 21, 2021

ELIZABETH WALTERS

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Date: 2022.01.10 11:45:46 -08'00'

Report Author Signature Date

Elly Walters
CAA/TRI Inspector
EPA Region 10

Pavitt, John

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Date: 2022.01.10 10:56:08 -09'00'

Peer Review Signature Date

John Pavitt
CAA Inspector
EPA Region 10

Section Chief Signature Date

Katie McClintock
ATES Section Chief
EPA Region 10

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Attachments

1. Basic Facility and Inspection Information

Facility:	Western Pneumatics, Inc. 110 North Seneca Road Eugene, OR 97402
Mailing Address:	Same
AFS/FRS Number:	ORLRA0004103908929
SIC:	3564 (Industrial and Commercial Fans, Blowers and Air Purification Equipment)
NAICS:	333413 (Industrial and Commercial Fan and Blower Manufacturing)
Permit Number:	208929 (Issued 12/8/2017; Modified 1/27/2020; Expires 12/8/2022)
Facility Contacts:	Mikala Larsen Environmental Consultant (541) 461-2600 mikalal@westernp.com
U.S. EPA Inspectors:	Elly Walters Air and Toxics Enforcement Section (ATES) Enforcement and Compliance Assurance Division (ECAD) U.S. EPA Region 10 1200 Sixth Ave. Seattle, WA 98101-3188 (206) 553-6317 walters.elizabeth@epa.gov John Pavitt ATES, ECAD U.S. EPA Region 10 Alaska Operations Office 222 W 7th Ave., M/S 19 Anchorage, AK 99513-7588 (907) 271-5083 pavitt.john@epa.gov Charlotte Papp ATES, ECAD U.S. EPA Region 10 (206) 553-8582

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LRAPA Inspectors:	Aaron Speck Compliance/Enforcement LRAPA (541) 736-1056, Ext. 240 aaron@lrapa.org
	Casandra Jackson Compliance/Enforcement LRAPA (541) 736-1056, Ext. 222 cjackson@lrapa.org
Date of Inspection:	September 21, 2021
Inspection Start/End Times:	1:00 PM – 6:45 PM
Inspection Notice:	Advance notice was provided to the facility via email by LRAPA on September 9, 2021 for this inspection (Attachment 3).

This was a joint Clean Air Act (CAA) compliance inspection by the Environmental Protection Agency (EPA) and Lane Regional Air Protection Agency (LRAPA), with EPA lead. The purpose of the inspection was to determine compliance with the facility's air contaminant discharge permit (No. 208929) and CAA requirements.

The facility designs and manufactures dust collection and air cleaning equipment for industrial applications. The facilities uses raw materials such as stainless or mild steel in sheets, pipes, flat bar, tube, round bar or square stock. The fabrication of dust collection and air cleaning equipment involves milling, grinding, welding, plasma and laser cutting, sandblasting and surface coating. Finished products are shipped out by truck. The facility operates approximately 4,160 hours per year (16 hours per day, 5 days per week and 52 weeks per year). Western Pneumatics was founded in 1982 and operates a facility at 110 N Seneca Road, Eugene, Oregon, which is classified as a maintenance area for CO and PM-10.[1] As described in the facility's Air Contamination Discharge Permit (ACDP), the facility is a synthetic minor source for hazardous air pollutants (HAP).

According to the ACDP, the facility submitted an Initial Notification and Notice of Compliance Status for 40 CFR Part 63, Subpart XXXXXX (6X) – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Nine Metal Fabrication and Finishing Source Categories on September 26, 2012. The facility later submitted a request dated January 13, 2020 to remove Subpart 6X from their current ACDP issued in December 2017. Subpart 6X applies to sources that are primarily engaged in the source categories listed in Table 1 of the rule.[2]

[1] See EPA's Greenbook list of nonattainment areas for criteria air pollutants https://www.epa.gov/green-book
[2] See 40 CFR Part 63 Subpart XXXXXX Final Rule E8-16263.pdf (govinfo.gov)

According to Western Pneumatics, 85% of their annual profits are derived from activities covered by SIC code 3564 and NAICS code 333413, which include the following activities:

- Dust and fume collecting equipment manufacturing
- Blower filter units manufacturing
- Fans, industrial and commercial-type manufacturing
- Ventilating fans, industrial and commercial-type manufacturing
- Air purification equipment, stationary, manufacturing
- Air washers (i.e., air scrubbers) manufacturing
- Electrostatic precipitation equipment manufacturing
- Air scrubbing systems manufacturing

LRAPA removed all language related to Subpart 6X from the ACDP, including Permit Conditions 9 through 19, and any internal references to Permit Conditions 9 through 19. The change to removal all language related to Subpart 6X had no effect on the facility's Plant Site Emissions Limits (PSELs).

The facility also submitted a Petition for Exemption Request from 40 CFR 63, Subpart HHHHHH (6H) – National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. The facility had previously submitted the same exemption request in 2012. LRAPA asked Western Pneumatics to reevaluate Subpart 6H applicability as part of their request to remove Subpart 6X from their ACDP. According to their submittal, Western Pneumatics does not perform spray application of coatings containing chromium, lead, manganese, nickel or cadmium (target HAPs; also referred to as MFHAPs) in concentrations greater than the thresholds contained in the rule. The facility also stated it does not perform paint stripping activities using methylene chloride.

Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection and from records review. The information provided does not constitute a final decision on compliance with CAA regulations or applicable permits, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

2. Compliance History

A review of EPA's Enforcement and Compliance History Online database[3] shows that at the time of the inspection, the facility was reported as having no CAA violations in the last three years. ECHO shows no formal or informal enforcement actions in the last five years.

3. Records Review

Compliance Reports

[3] See https://echo.epa.gov/

Permit Condition 21 requires the facility to submit Semiannual Compliance Reports to LRAPA and EPA R10. Permit Condition 19 required the facility to submit Annual Compliance Reports but was removed from the facility's ADCP as of January 27, 2020. EPA reviewed reports submitted by the facility from January 2018 through the date of the inspection.

- Semiannual Compliance Reports are due thirty-one (31) days after the end of each semi-annual reporting period. The first semi-annual reporting period is from January 1st through June 30th and the second semi-annual reporting period is from July 1st to December 31st.
    - The semiannual reports submitted for 2018, 2019, 2020 and 2021 were timely.
    - Included with the reports as required were emission estimations for the rolling 12-month period for hazardous air pollutants (HAPs) and volatile organic compounds (VOC). Emission estimates as reported were *lower than* the permitted Annual Plant Site Emission Limits (see Permit Condition 3).
    - Included with the reports were usage estimates for the 12-month period for welding rods, abrasive material, and fuel (see Permit Condition 18, this was removed as of January 27, 2020 and required for 2018 and 2019 reports).
    - Included with the reports were usage estimates for the rolling 12-month period for VOC and HAP-containing coatings and solvents (see Permit Condition 20).
    - HAP emissions were estimated to be less than 10 tons for each single HAP and less than 25 tons combined as required.
    - No excess emissions were reported.
    - No opacity limit exceedances were reported.
    - No non-compliance incidents related to air quality were reported.
    - The reports include information required under Conditions 4 and G15.
    - The facility reported "N/A" for measures taken to minimize dust from dry grinding and dry polishing machines (see Permit Condition 11, this was removed as of January 27, 2020 and required for 2018 and 2019 reports).
    - The facility reported measures taken to minimize dust from blasting operations, machining operations, and welding.

Records Request

On September 9, 2021, EPA requested records in advance of the on-site inspection, via email (Attachment 3). The list of the requested records is Attachment 3 to this report. Following below is a summary of the records received from the facility, with my response for each record.

Table 1: Records Review

Permit Condition	Requirement	Records
13.d, G5	Visible emission observations required.	Please provide a copy of all visible emissions observations of facility operations in 2019, 2020 and the first half of 2021, along with any corrective actions taken.

<table>
<tr><td colspan="3">Response: The facility provided records as requested. Opacity observations are performed monthly during normal operating conditions when work processes are in progress. The facility's Visible Observation of Control Device Emissions form covers the following areas: paint baghouse, laser and plasma baghouse, paint filter stack, sandblast baghouse and paint filters. All results were zero visible emissions. However, the form is missing details required by EPA Method 22:
- Wind speed and direction;
- Sky conditions;
- A sketch of the process unit being observed;
- The observer's location relative to the source and the sun; and
- Indicate the potential and actual emission points in the sketch.</td></tr>
<tr><td>7, 9.c.ii, 14, 15, 18.b, 19.c, G7</td><td>Fugitive emissions observations required.</td><td>Provide a copy of all fugitive emissions observations in 2019, 2020 and the first half of 2021, along with any corrective actions taken.</td></tr>
<tr><td colspan="3">Response: The facility provided records as requested. Visual determination of fugitive emissions are performed monthly during normal operating conditions. The facility completes fugitive emission observations at the main fabrication back door. The facility's uses the Visible Observation of Control Device Emissions form when completing fugitive emission observations at the main fabrication back door. All results were zero fugitive emissions. However, the form is missing details required by EPA Method 22:
- Wind speed and direction;
- Sky conditions;
- A sketch of the process unit being observed;
- The observer's location relative to the source and the sun; and
- Indicate the potential and actual emission points in the sketch.</td></tr>
<tr><td>4</td><td>PSEL Monitoring.</td><td>Provide the Safety Data Sheets (SDS) for all paints and coatings used at the facility in 2020.</td></tr>
<tr><td colspan="3">Response: The facility provided records as requested. SDS sheets were reviewed in order to determine if they contained VOCs and/or targeted HAPs (cadmium, chromium, lead, nickel and manganese). The "BBQ Black" high temperature paint (Forrest Technical Coatings) does contain a manganese compound at a concentration greater than 1 percent-by-mass. Per LRAPA's Source Inspection Report on October 25, 2018, the facility informed the LRAPA inspector that there was a 5-gallon pail of the black high temperature paint that was used for a special project. The facility was previously unaware that several coatings contained MFHAPs until they were informed by Forrest Paint on October 18, 2018. The facility also submitted that subsequent to that inspection, the black high temperature paint had been removed from the painting process. A review of coating usage records (included in the facility's semiannual and annual reporting) show that the black high temperature paint was not used in 2019 and 2020.</td></tr>
<tr><td>G11</td><td>Baghouse inspection and maintenance records.</td><td>Provide a copy of all baghouse inspection and maintenance records for 2019, 2020 and the first half of 2021.</td></tr>
</table>

Response: The facility provided records as requested. Records included inspection and maintenance records from the plasma cutter, laser cutter and paint booth baghouses. Records show that the facility regularly performs an inspection and maintenance on the baghouses at least twice a month. The facility also provided maintenance logs for the paint booth filter bank, which indicates that the facility inspects and changes filters at least weekly.		
G15	Log of upsets and planned and unplanned excess emissions.	Provide a copy of all log records for all upsets and planned and unplanned excess emissions for 2019, 2020 and the first half of 2021.
Response: The facility did not experience upsets and planned and unplanned excess emissions in 2019, 2020 and the first half of 2021.		
	40 CFR Part 63, Subpart HHHHHH applicability criteria. Paint Stripping and Misc. Surface Coating Operations.	Provide a copy of Western Pneumatics' Hazardous Materials Policy (which is referenced in the WP Exemption Request for Subpart HHHHHH).
Response: The facility provided records as requested. The facility requested exemption from Subpart 6H, as the facility states it does not use any coating product or solvent that contains target HAPs. The facility maintains and reviews SDS sheets for every coating product. The chemical composition of new proposed coating products are reviewed per the Western Pneumatics' Hazardous Materials Policy before order, delivery or use. The policy states that products containing target HAPs shall not be approved for use by the facility. As noted above, the facility reported one incident to LRAPA in 2018 where "BBQ Black" high temperature paint containing a manganese compound at a concentration greater than 1 percent-by-mass was received and used for a special project.		
	40 CFR Part 63, Subpart HHHHHH § 63.11177(e).	Records of paint strippers containing MeCl used for paint stripping operations, including the MeCl content of the paint stripper.
Response: The facility stated it does not use paint strippers containing MeCl.		

4. Inspection Elements/Order

a) Pre-Inspection Observations

Inspectors went directly to the facility. No observations were made prior to the scheduled inspection.

b) Entry and Opening Conference with facility representatives

Inspectors from EPA R10 and LRAPA arrived at about 1:00 PM at the facility parking lot and entered the building together. The inspectors were met by Mikala Larsen, Environmental Consultant, and escorted to a conference room. EPA R10 and LRAPA had provided advance notice for this air compliance inspection and were expected. The EPA and LRAPA inspection team started the opening conference by presenting agency inspector credentials to Ms. Larsen.

The opening conference began at 1:10 PM and the inspection team reviewed the scope of the inspection with Ms. Larsen. EPA R10 explained that this is a joint EPA/LRAPA inspection with EPA lead. The purpose was to check on compliance with the facility's

ACDP and CAA regulations. In addition, EPA was also inspecting this facility for compliance with Toxics Release Inventory (TRI) requirements. Inspector Walters identified herself as the lead on both the air and TRI compliance inspections. This report does not cover the TRI compliance inspection.

The inspection team informed Ms. Larsen that they would be taking photographs during the inspection and to please let them know if any information gathered from the inspection is Confidential Business Information (CBI). The inspection team requested a tour of the facility and to observe all equipment listed in the ACDP emission unit inventory. The inspection team discussed the recent change to the facility's ACDP, noting that the NESHAP Subpart XXXXXX (6X) requirements were removed from the permit. Ms. Larsen explained that the facility's NAICS code used to be 332999 (All Other Miscellaneous Fabricated Metal Product Manufacturing), and that she had determined the facility's NAICS code as 333413 (Industrial and Commercial Fan and Blower and Air Purification Equipment Manufacturing) because 85% of the facility's sales were for air emissions control equipment. She explained that since NAICS code 333413 is not listed as an industry sector subject to 6X, the facility submitted a Permit Amendment Request to remove the 6X requirements from its ACDP on January 16th, 2020 and LRAPA approved the request on January 27th, 2020. The facility's request also included an exemption request for NESHAP Subpart HHHHHH (6H), stating that the facility does not use any coating product or solvent that contains target HAP as defined under §63.11180.

The inspection team discussed the records request EPA R10 sent in advance of the inspection, and the records that had been received. EPA R10 had not yet completed their full review of the records but had reviewed the facility's annual reports prior to the inspection. Inspector Pavitt noted that the facility had reported zero activity in 2019 and 2020 for dry grinding and dry polishing activities and asked if any dry grinding or dry polishing occurred on-site. Ms. Larsen stated that some dry grinding and dry polishing occurs onsite, and that she tracks the total quantity of grinding wheels (and therefore dry grinding activity). The group also discussed the SDS's submitted by the facility and it was noted that the "BBQ Black" high temperature paint contained a MFHAP above 1 percent-by-mass. Ms. Larsen explained that the facility used the coating briefly for a special project in 2018, but operators were unaware that it contained a MFHAP until Forrest Paint later notified Western Pneumatics. Ms. Larsen explained that the facility does not use any MFHAP-containing coatings and follows the Western Pneumatics' Hazardous Materials Policy to review SDS's, order and use coatings that do not contain MFHAPs.

The inspection team requested that during the tour, that Ms. Larsen indicate the facility's observation points for opacity and fugitive dust observations.

5. Facility Walk-Through

The inspection team was escorted by facility representative Mikala Larsen and were occasionally joined by other facility representatives during the walkthrough (identified below).

The walk-through included looking at equipment listed in the permit emission unit inventory (Attachment 2), observing for additional equipment not listed in the permit, observing operating status of process equipment and pollution control equipment, interviewing operators and taking photographs.

The walkthrough began at 2:30 PM. A digital photo log is Attachment 1 to this report. A Map of the facility is Attachment 5.

Shipping/Receiving Area

Steel arrives by truck and is stored in an area to the north side of the facility. The facility receives different grades of steel (primarily stainless and mild) in sheets, pipes, flat bar, round bar and square stock, and stages the received materials outside. The facility also receives smaller materials, such as nuts and bolts, that are stored in this area as well. Ms. Larsen also pointed out scrap metal in a storage bin to be sent offsite to be recycled. She explained that this facility reuses all materials and some scrap is sent to the Pacific Recycling facility next door. The weight of and metal concentrations in scrap sent to Pacific Recyling is tracked by Western Pneumatics. The shipping/receiving area was organized and free of clutter.

Paint Cabinet Area

The facility paints the manufactured air collection equipment according to customers' specifications. The inspection team was able to interview several employees regarding the paint storage area, how they manage inventory and track usage. According to the employees, coatings are stored in the Paint Cabinet area. Coatings are approved by the Inventory Supervisor prior to use. Employees explained how they track paint usage. Painters report the volumes used of each paint and the Paint Supervisor then inputs this data into the Paint Tracking Spreadsheet. Measuring buckets are used by paints to determine volumes. Ms. Larsen then collects data from the Paint Tracking Spreadsheet in order to calculate emissions for PSELs to LRAPA and TRI to EPA. The inspection team and Ms. Larsen were also joined by Jeff Cooper, the Plant Superintendent, for the rest of the walkthrough.

Plasma Burn Table

The plasma burn table is located in the main fabrication building on the north end of the facility. The inspection team observed the plasma burn table in operation. The plasma burn table is not enclosed, and emissions are collected via a down draft table and routed to a baghouse built by Western Pneumatics. The inspection team and facility representatives then walked outside in order to observe the baghouse while the plasma burn table was in operation. The inspection team inspected the baghouse and measured the pressure drop at 11-12" Δ, and asked facility staff if this was within the normal operating range. The operator answered that he did not know if that was a "good" pressure drop, and that he relies on maintenance to maintain the baghouse. The inspection team also observed the shutdown of the baghouse. Inspectors noted good housekeeping around the baghouse and did not observe dust around it.

Paint Booth

The paint booth is located south of the main fabrication building. The paint booth and sandblasting booth are located in the same building with a door in the middle for separation. Ryan Hockett, the Paint Supervisor, joined the inspection team for this part of the walkthrough. Mr. Hockett explained how he tracks the gallons of paint used and logs the amounts into the spreadsheet, which is updated every morning. Mr. Hockett also stated that the paint usually comes in 5-gallon buckets. The facility paints large items in the Paint Booth, which is an enclosed booth with negative air. The booth has floor-to-wall filters on the east and west walls of the booth. Emissions are controlled by filters and a baghouse system. Operators were priming pulse baghouse filter boxes at this time, and the inspection team stood outside the building and observed the baghouse while facility staff actively coated inside. The inspection team did not observe visible emissions coming from the exhaust stack. The inspection team was then escorted into the paint booth. The operators turned on the booth's fan system (but were not actively coating) and the inspection team was able observe the air flow inside the booth. Negative air pressure draws air into corrugated filters which is then vented to the baghouse. Inspectors used a piece of paper to test the negative air pressure and observed it sticking to the filters. The booth also has a wall of corrugated filters on the opposite side for intake air. Operators heat the intake air so the paint will cure. A gas furnace is used to heat the intake air (has a BTU of 1,516,000) and is located outdoors on the west side of the paint and sandblasting building. Inspectors noted that this gas furnace was not listed as an emission unit in the facility's ACDP.

Sandblasting Booth

The facility sandblasts metal materials in order to remove the mill scale and to give the metal a better profile for adhesion of paints. The facility uses "green diamond" sand as its blasting media. Emissions are controlled by a baghouse system. The inspection team entered the sandblasting booth and were able to observe Mr. Hockett sand blast a piece of metal. The inspectors noted a substantial amount of sand on the floor. The inspection team exited the sandblasting booth in order to observe the baghouse system while operators actively blasted in the booth. The inspectors did not observe visible emissions coming from the exhaust stack or along the exterior of the booth. The inspection team then examined the baghouse. A screw conveyer at the bottom of the baghouse moves fines into a hopper. The hopper is periodically emptied into large fines bins in the storage yard area. Fines are sent offsite for disposal. Inspectors observed that the hose from the baghouse to the fines collection hopper was not sealed tightly and had a small gap. The facility attempted to reseal the hose but were unable to. The inspectors did observe the baghouse again while operators actively blasted and did not observe visible emissions from the gap in the hose. Inspectors observed the baghouse pressure gauge was showing a pressure drop of 2.9" Δ and operators were unable to confirm if this was within a normal operating range when asked during the inspection.

Solvent/Paint Recycling Area

The facility recycles leftover solvent and paint in an area on the east side of the paint and sandblasting building. The operators transfer leftover paints to one container at the paint deck, which has a spill basin as well as a secondary tray to open paints or other liquids

over. Waste liquids from spray guns, pumps and lines are also contained in a drum with an agitator to mix continuously. Waste liquids are then poured into a solvent recycling system that vaporizes and recondenses solvents for reuse and produces a dry waste material. This dry waste material is placed into a separate drum and is picked up by Safety Kleen for disposal, according to the facility representatives. Inspectors examined the dry waste drum and were concerned that the drum did not have a date posted on it (hazardous waste regulations require facilities to mark when waste was first put into the drum). When asked about the VOC contents of the paint and liquids, Ms. Larsen stated that the facility only uses low HAP content liquids (3.4 or less VOC percent-by-mass). Ms. Larsen also explained that the facility uses high-volume low-pressure (HVLP) spray guns for its coating operations and does not use MeCl. The inspectors then examined the Liquid Storage area, which has a 5" drip tray underneath that is connected to the spill basin. The Liquid Storage is ventilated and has explosion panels.

Laser Cutter

The laser cutter is located in the assembly building on the north end of the facility. The laser cutter is completely enclosed and is vented to a baghouse built by Farr located outside of the building. On the way to the laser cutter, Ms. Larsen explained that the facility welds metal pieces together and the facility does not have management practices for fugitive emissions. She also added that the facility does not have a hood or baghouse system for welding. The inspectors observed the laser cutter in operation inside of the building. Ms. Larsen explained that the laser cutter is used to cut metal sheets that require higher resolution and the facilities use as much of the sheets as possible. The group then walked outside to observe the Farr baghouse while the laser cutter was actively cutting. Inspectors measured the baghouse pressure drop at 0.5" Δ and operators were unable to confirm if this was within a normal operating range when asked during the inspection. Ms. Larsen explained that the day shift typically checks the pressure drop and that the laser cutter will not actively cut if the baghouse is not operating. Inspectors observed a small hole (about the width of a pencil) in the portion of the baghouse ductwork located outside of the building. The facility was unable to fix the hole during the inspection. Inspectors did not observe visible emissions from the baghouse stack or the hole while the laser cutter was in operation.

Storage Yard Area

There is a large outdoor storage yard on the south end of the facility. The facility stores salvaged parts as well as products to be sold and shipped out to customers. The group walked through the storage yard and noted that most items were air pollution control equipment. Inspectors also inspected the large fines bins (where fines from the sandblasting baghouse are emptied into) and observed dust around and underneath the bin. Inspectors expressed concerns for the potential for fugitive dust and noted that the large fines bins required better housekeeping.

Blower and Feeder Building

The group walked through the Blower and Feeder Building. Ms. Larsen explained that mostly miscellaneous welding occurred in this building. Inspectors identified a piece of equipment that was a mobile welding fume extraction system. Ms. Larsen stated that she

was unaware that this was onsite, as the facility does not have controls or management practices for welding emissions.

6. Closing Conference

At 6:15 PM, the group returned to the facility conference room to discuss the inspection. The inspectors summarized the parts of the facility they had visited during the inspection and their observations related to CAA and TRI. This report only covers observations related to CAA. The following were identified as potential compliance concerns during the closing conference:

1. Operators could not determine if baghouse pressure drops were within a normal operating range during the inspection. Facility staff stated they rely on maintenance staff to determine that. Inspectors expressed concerns that in order for operators to ensure baghouses are operating properly prior to actively painting, cutting and blasting, they must ensure and be able to determine that baghouses are operating within normal operating ranges.
2. Inspectors identified a gas furnace that was not listed as an emission unit in the facility's ACDP.
3. Inspectors observed a small gap in the hose from the bottom of the Sandblasting Booth baghouse to the fines collection bin. The facility was unable to reseal the house during the inspection. The inspectors recommended that this be resealed as soon as possible.
4. Inspectors observed dust around the large fines bins in the Storage Yard area. Inspectors expressed concerns that the large fines bins could potentially be a source of fugitive emissions. They also recommended better housekeeping practices for transferring into and storing fines in the bins.
5. Inspectors observed that the dry waste drum in the Solvent/Paint Recycling area did not have a date on it. Hazardous waste regulations require facilities to mark when waste was first put into the drum. Ms. Larsen stated that Safety Kleen drops off and labels the drum and would contact them in order to make sure the drum complied with applicable regulations.
6. Inspectors observed a small hole in the FARR baghouse ductwork. The facility was unable to reseal the ductwork during the inspection. The inspectors recommended that this be resealed as soon as possible.

Inspector Walters explained that the inspection would not be complete all the records were reviewed and compared observations and notes to the permit and CAA regulations. The EPA and LRAPA inspectors departed the facility at about 6:45 PM.