

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

Arnette Polymers, LLC
8905 Wollard Blvd
Richmond, MO 64085
(816) 776-3005

EPA ID Number: MOR000000422

On

June 28 and 29, 2023

By

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 7
Enforcement & Compliance Assurance Division (ECAD)

1.0 INTRODUCTION

I performed a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Arnette Polymers, LLC (Arnette), located in Richmond, Missouri, on June 28 and 29, 2023. 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 used oil generator. Arnette was last inspected for RCRA compliance on May 23, 2019, by the Missouri Department of Natural Resources (MoDNR). Two potential findings or violations were observed or cited as a result of the 2019 MoDNR RCRA inspection.

2.0 PARTICIPANTS

Arnette:

Matt Kitahara, Vice President, Operations
Brian Butler, EHS Manager
Jeff Franklin, Assistant Manager, Operations
Kyle Rowland, Envirow, LLC
Parker Lamason, Envirow, LLC
Jim Arnette, President (Exit Briefing)

U.S. Environmental Protection Agency (EPA):
Kevin Snowden, ECAD
Timothy Evans, Life Scientist, ECAD (Lead Inspector)

3.0 INSPECTION PROCEDURES

On June 28 and 29, 2023, Kevin Snowden and I arrived at the facility at approximately 9:20 a.m. A drive-by inspection was only possible on the west side of the facility. No apparent issues were observed. Mr. Snowden and I then proceeded to the facility front gate and called the phone number listed. I spoke to a person in the lab and asked if Thomas Duffield was available; Mr. Duffield was listed as site contact on the Notification Acknowledgement/Verification Report form (Attachment 6). Mr. Snowden and I were greeted by Messrs. Kitahara and Butler at the front gate and were directed to drive to the facility office. Messrs. Kitahara and Butler escorted Mr. Snowden and me to Jim Arnette's office/conference room for the in briefing. We were introduced to Messrs. Rowland and Lamason, who joined us for the in briefing. I presented Messrs. Kitahara, Butler, Rowland, and Lamason with my business card and I presented my EPA credentials. During the in-briefing, I presented Messrs. Kitahara and Butler with a copy of the RCRA Facility Access Information Sheet, March 2013, which provides inspection authority. I explained my need to collect accurate information and presented Messrs. Kitahara and Butler with a copy of Title 18 U.S. Code, Sections 1001 and 1002. As part of the in-briefing, Messrs. Kitahara, Butler, Rowland, and Lamason were made aware of Arnette'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. Messrs. Kitahara, Butler, Rowland, Lamason, and Franklin acted as the facility representatives 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 1-13, including Photos 1-45).

Method 21 Monitoring

I calibrated a Thermo Fisher Scientific TVA2020 organic vapor analyzer (OVA) the morning of June 28, 2023, prior to our arrival at the facility (Attachment 8). I used the OVA for Method 21 monitoring of volatile organic emissions; the OVA was equipped with a flame ionization detector (FID). Findings from the operation of the FID-equipped OVA was recorded on field sheets (Attachment 8).

Mr. Snowden and I conducted a visual inspection of the following areas:

6/28/23

Less Than 90-Day Accumulation – Lab
Door 38 – Lockers/Showers
Door 37 – Welding/Fabrication
Less Than 90-Day Accumulation – Warehouse B
8-Yard and 30-Yard Roll-Off Containers
Warehouse C – Tank Farm
Drum Off Room

Lab – Including High Ventilation Room

6/29/23

Warehouse D

Warehouse E

Outdoor Tank Farm

Stormwater and Steam Line Retention

Warehouse A

Water Retention Area Between Warehouse A and 103 Pad

103 Pad

103 Room

105 Room

Maintenance Shop

Boiler Room

Air Compressor Room – Universal Waste Battery Accumulation Area

Emergency Generator Shed

LEL Flammable Filling Room

101B Tank

Boneyard - Outside on Southeast Corner of Facility Property

Information collected during the inspection was documented on the following MoDNR checklists: Hazardous Waste Large Quantity Generator Inspection Checklist and Large Quantity Generator – Tank Attachment. Additional information was documented in a bound field note logbook, on field sheets, and as discussed below.

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

The following inspection documents were provided to Arnette:

Inspection Documents

Confidentiality Notice

*Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by
EPA In Connection with Inspections*

Receipt of Documents and Samples

EPA Compliance Assistance Handouts (Provided by e-mail on June 30 and July 26, 2023)

U.S. EPA Small Business Resources

EPA Industry Sector Notebooks List

EPA Compliance Assistance Centers

Security Awareness

Chemical Facility Anti-Terrorism Standards

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 and RCRA Status

The Arnette facility in Richmond, Missouri manufactures epoxy and polyurethane intermediate products for the thermoset polymer industry.

The hours of operation for the facility are 24 hours each day, Monday through Friday. The facility consists of multiple buildings and warehouses for raw material and product storage and manufacturing (See Attachment 2 for facility diagram and aerial photo). Arnette employs approximately 37 people.

Hazardous waste generated at the facility includes, but is not limited to, epoxy wastes, curing agent wastes, process sludge, waste vacuum pump oil, and lab waste. The facility also generates universal wastes batteries and is a co-generator of used oil. See Attachment 7 for additional information related to waste streams generated at the facility.

4.2 RCRA Status

According to the RCRAInfo database, Arnette has notified as an LQG of D001, D002, D003, D021 characteristic hazardous waste and F003, F005, U008, U057, and U188 listed hazardous waste, last notifying on January 26, 2022. I provided Messrs. Kitahara and Butler with a Notification Acknowledgement/Verification Report form for review (Attachment 6). Mr. Butler stated that he had assumed the position formerly filled by Thomas Duffield. I edited a copy of the Notification Acknowledgement/Verification Report form, replacing Mr. Duffield's information with Mr. Butler's information. See Section 4.6.5 for additional information related to the Notification Acknowledgement/Verification Report form. Based upon the amount and type of hazardous waste generated at Arnette, I inspected the facility as an LQG of hazardous waste, small quantity handler of universal waste, and used oil generator.

4.3 Previous Inspection and Related Findings

Arnette was previously inspected by the MoDNR on May 23, 2019. The 2019 MoDNR inspection report, included the following potential findings or violations:

1. Failure to label containers used to accumulate hazardous waste in accordance with applicable US DOT labeling requirements in 49 CFR part 172 subpart E during the entire time the waste is stored on site, in violation of 10 CSR 25-5.262(2)(C)1.A.

Or, to clearly label each container with words that correctly identify the hazards of the contents of the container (as defined in 40 CFR part 261 subparts C and D: Ignitable, Toxic, Corrosive or Reactive) during the entire on-site storage period, in violation of 10 CSR 25-5.262(2)(C)1.B.

2. Failure to include a list of emergency equipment at the facility including description, location, and capabilities in the contingency plan and keep the list up to date, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(e).

4.4 Changes Since Previous Inspection

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

- Brian Butler became the new Environmental Health and Safety Manager and site contact in April of 2023, replacing Thomas Duffield. See Section 4.6.5. for additional information.
- Construction of Warehouse E was completed in 2019. The concrete blast wall adjacent to Warehouse E was completed in 2021. According to Mr. Kitahara warehouse E is used to store approximately 40% finished goods/product and approximately 60% raw material used in manufacturing.
- One raw material tank was installed in Warehouse A in 2019.

4.5 Waste Streams and Waste Management

Information related to waste streams is listed in the Waste Stream Table (Attachment 7). It should be noted that Arnette had previously notified the MoDNR of their intent to manage Satellite Accumulation Area (SAA) containers under the Missouri regulations. SAA container management regulations can be found in the MoDNR document entitled Hazardous Waste Large Quantity Generator Inspection Checklist (Attachment 9).

4.6 Areas Visually Inspected and Related Preliminary Findings

4.6.1 Drum Off Room

Hazardous Waste Satellite Accumulation Container Not Closed, 10 CSR 25-5.262(1) referencing 40 CFR 265.173(a) (NOPF 2) - During inspection of the Drum Off Room, I observed one, approximately 3/4-full SAA 55-gallon drum of what was described as D001 and F005 hazardous waste vacuum pump oil (Photos 12 and 14). The small bung on top of the drum was not fully screwed into the bung hole. Facility personnel closed the bung, addressing part of NOPF 2 at the time of the inspection (Photo 15).

Used Oil Containers Not Marked or Labeled with the Words “Used Oil”, 10 CSR 25-11.279(1) referencing 40 CFR 279.22(c)(1) (NOPF 3) - During inspection of the Drum Off Room, I observed a vacuum pump used to create process conditions for low temperature distillation of process aide and raw material recovery, and as a tool for negative pressure direct charging (loading) materials in the respective vessels (Photo 9). Used oil was observed in the pump secondary containment (Photos 9 and 10). Used oil was also observed in a 1-gallon can, located next to the pump (Photos 9 and 11). A total of approximately 1/2 gallon of used oil was observed in the secondary containment and the 1-gallon can. The secondary containment and 1-gallon metal can were not labeled with the words “Used Oil.” Facility personnel labelled a new container with the words “Used Oil” for use next to the pump (Photo 44). According to Messrs. Kitahara and Butler, the used oil was removed from the pump secondary containment and added to the vacuum pump hazardous waste SAA container, addressing NOPF 3 at the time of the inspection. According to Mr. Kitahara, although the used oil from the secondary containment was determined not to be hazardous waste, facility personnel disposed of the use oil in the vacuum pump hazardous waste SAA container out of convenience and compatibility with the waste in the SAA container. Mr. Kitahara stated that the process occurring with Vac Pump 3 at the time of the inspection would not have made the used oil removed from the secondary containment or 1-gallon can a D001 hazardous waste.

4.6.2 Warehouse C - Tank Farm

Facility Not Maintained and Operated to Minimize Release of Hazardous Waste, 10 CSR 25-5.262(1) referencing 40 CFR 265.31 (NOPF 6) - During inspection of hazardous waste tank ST8, within the Warehouse C Tank Farm, I observed approximately one quart of what was described by the facility as D001, F003, and F005 Waste Flammable Liquids (Toluene, Mixed Xylenes) Bulk Tank Sludge and Solvents hazardous waste on top of the tank, adjacent to the manway cover (Photos 1-3 and 5). According to Messrs. Kitahara and Butler, the hazardous waste tank sludge was deposited on top of the tank when facility personnel last cleaned the tank. Mr. Kitahara stated that a hose is lowered into the tank through the tank manway opening and is used to wash the residual sludge out of the tank. According to Mr. Kitahara, the hose comes in contact with the sludge in the tank as part of the cleaning process. The hazardous waste sludge is then carried out and on to the top of the tank when the hose is removed from the tank after cleaning.

4.6.3 Laboratory

Fourier Transform Infrared (FTIR) Spectrometer Cleaning Waste

Hazardous Waste Satellite Accumulation Container Not Closed, 10 CSR 25-5.262(1) referencing 40 CFR 265.173(a) (NOPF 2); Container Used to Accumulate Hazardous waste Not Labeled with Hazard of the Contents, 10 CSR 25-5.262(2)(C)1. (NOPF 7 Added After Inspection); Container Not Marked with Beginning Date of Satellite Accumulation, 10 CSR 25-5.262(2)(C)3.C. (NOPF 8 Added After Inspection); and Hazardous Waste Satellite Accumulation Container Not Labeled with the Words “Hazardous Waste”, 10 CSR 25-5.262(C)3 referencing 40 CFR 262.34(c)(1)(ii) (NOPF 9 Added After Inspection) - During inspection of the Laboratory, I observed one, 5-gallon SAA bucket containing approximately 1/4 pound of F005 hazardous waste FTIR Spectrometer Cleaning Waste (50% Toluene/50% Isopropyl Alcohol-Contaminated Cotton Balls, Q-Tips, Toilet Tissue, Gloves, Pipettes) (Photo 21). The bucket was not labeled with the words “Hazardous Waste”, an indication of the hazard class, and a Missouri option satellite accumulation start date. The bucket was also not closed. Facility personnel placed a lid on the bucket and labeled the bucket with the words “Hazardous Waste”, an indication of the hazard class, and an accumulation start date, addressing parts of NOPF 2, 7, 8, and 9 at the time of the inspection (Photos 22 and 23). Isopropyl Alcohol and Toluene Safety Data Sheets (SDS) are included in this report as Attachment 10. An e-mail was sent to the facility on July 28, 2023, informing the facility of the additional NOPFs (Attachment 12).

Waste Corrosive Liquids Titrant Waste

Container Not Marked with Beginning Date of Satellite Accumulation, 10 CSR 25-5.262(2)(C)3.C. (NOPF 8 Added After Inspection); and Hazardous Waste Satellite Accumulation Container Not Labeled with the Words “Hazardous Waste”, 10 CSR 25-5.262(C)3 referencing 40 CFR 262.34(c)(1)(ii) (NOPF 9 Added After Inspection) - During inspection of the Laboratory, I observed one, 4-Liter SAA container containing approximately 100 ml of D001, D002, and D021 hazardous waste Titrant Waste (Acetic Acid, Monochlorobenzene, and Water), located in the Lab Titrant Hood (Photos 24 and 25). The container was closed but was not labeled with the words “Hazardous Waste” or the Missouri option satellite accumulation start date. Facility personnel labeled the container with a description of the contents at the time of the inspection (Photo 43).

An e-mail was sent to the facility on July 28, 2023, informing the facility of the additional NOPFs (Attachment 12). It should be noted that Container Used to Accumulate Hazardous waste Not Labeled with Hazard of the Contents, 10 CSR 25-5.262(2)(C)1. (NOPF 7 Added After Inspection) was inadvertently cited for titrant waste in the July 28, 2023, e-mail. The container had been properly labeled to indicate the hazard of the contents.

4.6.4 Boneyard - Outside, Southeast Portion of the Facility

Hazardous Waste Determination Not Conducted, 10 CSR 25-5.262(1) referencing 40 CFR 262.11 (NOPF 6) - During inspection of the Boneyard, outside, southeast portion of the facility, I observed the following containers and fluorescent lamps:

- One, 55-gallon black steel drum containing approximately 3-4 inches of unknown liquid (Photos 37 and 38)
- Three, 1-gallon cans of asphalt tar (Photo 37)
- Two aerosol cans (Photo 37)
- Two, 8-foot fluorescent lamps (1 broken, 1 unbroken) (Photos 37 and 38)
- One, 55-gallon white steel drum containing approximately 300 pounds of unknown solid material (Photo 39)
- Four, 5-gallon white polyethylene totes of unknown liquid (Photo 40)
- One, full open approximately 125-gallon white polyethylene tote of unknown liquid (Photos 41 and 42)

During the exit briefing, I asked Mr. Kitahara if a hazardous waste determination needed to be conducted for the containers and lamps, listed above. Mr. Kitahara stated that a hazardous waste determination would need to be conducted for the containers and lamps.

4.6.5 Records Review and Related Preliminary Findings

Facility Registration with MoDNR

Updated Generator Information Not Filed/Communicated with MoDNR, 10 CSR 25-5.262(2)(A)3.B. (NOPF 1) - As part of the inspection in briefing, I provided a Notification Acknowledgement/Verification Report form to Messrs. Kitahara and Butler for review (Attachment 6). I asked Messrs. Kitahara and Butler if all of the information appeared to be accurate. Mr. Butler stated that he had assumed the position formerly filled by the listed site contact, Thomas Duffield. According to Mr. Butler, he became the new Environmental Health and Safety Manager and site contact in April of 2023. According to the MoDNR guidance document entitled "Hazardous Waste Generator Status Guidance - PUB2224", businesses are required to complete and file an updated Notification of Regulated Waste Activity form whenever there is a change in the facility contact person. During the exit briefing, I informed Messrs. Kitahara, Butler, Rowland, and Franklin that, as a convenience to generators, the MoDNR allows generators to inform the department of a change in the facility contact person by e-mail.

Daily Inspections

Daily Inspection Log Not Maintained for Hazardous Waste Tank Inspections Conducted on Saturdays and Sundays, 10 CSR 25-5.262(1) referencing 40 CFR 265.195(c) (NOPF 4) - During review of records, I asked Messrs. Kitahara and Butler if a daily inspection log was maintained for hazardous waste tank ST8 inspections conducted on Saturday and Sundays. According to Mr. Kitahara, Arnette operates 24 hours each day, Monday through Friday. Mr. Kitahara stated that a visual inspection is conducted by a night security guard, on Saturdays and Sundays.

However, according to Mr. Kitahara, the inspections are not documented in the facility electronic inspection log maintained at the facility. See Attachment 13 for an example of hazardous waste tank daily inspections.

Weekly Inspections

September 2022 through November 2022 weekly container inspection documentation was reviewed. No apparent issues were observed during review of weekly inspection documentation.

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 June 2020 through May 2023, using RCRAInfo. During the inspection, I reviewed the following LDR notification forms associated with hazardous waste generated at and shipped from the facility:

- Waste Tank Sludge (OG2910) – D001, F003, and F005
- Acetic Acid Lab Waste (169-9031) – D001, D002, and D021
- Epoxy Filters (169-8150) – F003 and F005
- Epoxy Liquid/Waste Resin Solution (169-7567) – D001, F003, and F005
- Vacuum Oil (169-8257) – D001
- Curing Agent Filters (169-8149) – F003 and F005

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 biennial report using RCRAInfo. No apparent issues were observed during review of the 2021 comprehensive biennial report.

Contingency Plan

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

- Emergency Response Coordinators – Matt Kitahara, Vice President, Operations, was listed as the primary Emergency Response Coordinator (ERC). Dwayne Dillon, Production Supervisor, and Curtis Woods, First Shift Production Supervisor, are listed as alternate ERCs.
- The contingency plan contains a description of fifteen pieces of emergency response equipment and their "anticipated use"/capabilities. The pieces of equipment were listed as the contents of spill kits.

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

Preparedness and Prevention

During the inspection, I noted several ABC-rated and Halotron (rated for electrical fires) fire extinguishers throughout the facility had been inspected by Marmic Fire and Safety Co., Inc. in August of 2022. According to Messrs. Kitahara and Butler, Ozark Fire Sprinkler Co. checks and tests water pressure and sprinkler heads. The last test was conducted May 22-25, 2023.

The facility is also equipped with a foam fire suppression system. However, testing and inspection documentation related to the foam fire suppression was not reviewed during the inspection.

A 225,000-gallon capacity tank is located east of the maintenance shop and adjacent to the boiler room. The tank is used to store water for fire suppression. A spill kit, located within the Warehouse B, Less Than 90-Day Accumulation area, contained a shovel, absorbent pigs/socks, absorbent pads, nitrile gloves, Tyvek suit/apron, respirator, and duct tape. No apparent issues were observed during review of emergency equipment testing and inspection records.

Communication Devices and Alarms

The facility is equipped with an internal emergency communication system with options such as an air horn, general alarm, and an all clear signal. Two way radios are also used for communication by facility personnel.

Familiarize Local Authorities

According to documentation provided during the inspection, the following emergency response agencies were contacted by Arnette on January 20, 2020:

Richmond Fire Department
Ray County Sheriff's Department
Ray County Memorial Hospital
MoDNR
North Kansas City Hospital

The emergency Response Plan was shared with emergency response agencies on November 21, 2019.

Tank Assessment and Testing

According to Messrs. Kitahara and Butler, API testing was conducted on hazardous waste tank ST8 in August of 2019. A tank assessment was conducted by Schreiber Yonley and Associates on December 22, 2010.

Personnel Training

Training Today is the software used by Arnette for facility personnel training. Topics covered within the training material include, but are not limited to:

- What is Hazardous Waste?
- Characteristic Hazardous Waste
- Manifests
- Emergency Equipment
- Satellite Accumulation
- Container Management – Labelling and Closed Containers
- Hazardous Waste Codes
- Hazardous Waste Types Generated at Facility
- RCRA Empty Containers

Training documentation was reviewed for Brian Butler, EHS Manager. Mr. Butler began working at Arnette on April 4, 2023 and received the RCRA specific training on April 11, 2023. Training documentation appeared to be complete with no apparent issues.

Position Descriptions and RCRA Training Associated with Positions

During review of records, the following position descriptions were provided by Messrs. Kitahara, Butler, and Jenkins:

- Vice President Operations – Position description states that the person in this position is required to participate in all environmental training required by state and federal regulations, including RCRA
- EHS Manager – Responsible for conducting new employee and refresher training programs including RCRA hazardous waste
- Assistant Operations Manager – Assists the EHS Manager with conducting new employee and refresher training programs including RCRA hazardous waste
- Production Superintendent, Production Supervisor, Utility Technician, and Process Technician – Position descriptions state that people in these positions are required to participate in all environmental training required by state and federal regulations, including RCRA

4.6.6 Additional Observations

Raw Material/Product on Walls and Floor, Inside Facility and Residual Soft Resin Debris Inside and Outside of Facility - During the visual inspection, I observed what was described as incidental spilling of raw material/product and residual soft resin debris on walls, floors and on concrete outside at the facility (Photos 16-20, 29-31, and 33-36). According to Messrs. Kitahara and Butler, the material is unintentionally released as part of the manufacturing process(es). The SDS for resin used at the facility appears to indicate that it would not be a hazardous waste when spilled onto the concrete floor inside the R101 Room and East Pad (Attachments 11). During an MS Teams meeting on July 28, 2023, I mentioned to Messrs. Kitahara, Butler, Franklin, and Rowland that although the residual soft resin debris and other raw materials observed throughout the facility may not be hazardous waste when spilled, it would still be considered a solid waste, potentially susceptible to migrating offsite by being tracked outside (Photos 33-36).

5.0 SUMMARY

I inspected Arnette 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. Updated Generator Information Not Filed/Communicated with MoDNR – Site Contact, 10 CSR 25-5.262(2)(A)3.B (NOPF 1)
2. Hazardous Waste Satellite Accumulation Containers Not Closed, 10 CSR 25-5.262(1) referencing 40 CFR 265.173(a) (NOPF 2)
3. Used Oil Containers Not Marked or Labeled with the Words “Used Oil”, 10 CSR 25-11.279(1) referencing 40 CFR 279.22(c)(1) (NOPF 3)

4. Daily Inspection Log Not Maintained for Inspections Conducted on Saturdays and Sundays, 10 CSR 25-5.262(1) referencing 40 CFR 265.195(c) (NOPF 4)
5. Facility Not Maintained and Operated to Minimize the Possibility of a Non-Sudden Release of Hazardous Waste, 10 CSR 25-5.262(1) referencing 40 CFR 265.31 (NOPF 5)
6. Hazardous Waste Determination Not Conducted, 10 CSR 25-5.262(1) referencing 40 CFR 262.11. (NOPF 6)
7. Containers Used to Accumulate Hazardous waste Not Labeled with Hazard of the Contents, 10 CSR 25-5.262(2)(C)1. (NOPF 7 Added After Inspection) (*Cited during the May 23, 2019 MoDNR inspection*)
8. Containers Not Marked with Beginning Date of Satellite Accumulation, 10 CSR 25-5.262(2)(C)3.C. (NOPF 8 Added After Inspection)
9. Hazardous Waste Satellite Accumulation Container Not Labeled with the Words “Hazardous Waste”, 10 CSR 25-5.262(C)3 referencing 40 CFR 262.34(c)(1)(ii) (NOPF 9 Added After Inspection)

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

**TIMOTHY
EVANS**

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Timothy R. Evans
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Amber Whisnant
Section Chief
ECAD/CB/RCRA, EPA Region 7

Attachments

1. Digital Image Log (50 pages/45 photos)
2. Aerial Photo and Facility Diagram (2 pages)
3. Confidentiality Notice (1 page)
4. Receipt for Document (1 page)
5. NOPF (3 pages)
6. Notification Acknowledgement/Verification Report Form (2 pages)
7. Waste Stream Table (13 pages)
8. OVA Calibrations and Field Sheet (4 pages)
9. Hazardous Waste Large Quantity Generator Inspection Checklist (12 pages)
10. Isopropyl Alcohol and Toluene SDS (23 pages)
11. Resin SDS (13 pages)
12. Additional NOPF E-Mail (2 pages)
13. Daily Tank Inspection Logs (49 pages)