

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

QUAD/GREENFIELD LLC
401 North Townline Road
Greenfield, Iowa 50849
515-446-3505

EPA ID Number: IAD000669960

On

November 20, 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 Quad/Greenfield LLC (QUAD) at 401 North Townline Road in Greenfield, 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

QUAD:

Rick Stender, Facility Supervisor
Doug Dorrell, Ink Maker II
Lacey Schucht, Corporate Senior Environmental Manager (Teleconference)

Toeroek Team:

Clifford Nelles, Inspector, 816-213-5192

INSPECTION PROCEDURES

Prior to the CEI at QUAD on November 20, 2024, I conducted a drive-by visual inspection. I did not observe any areas of concern during the drive-by. At approximately 8:00 a.m., I entered the main office and was met by Mr. Rick Stender. I explained that I was there to conduct a CEI and asked to speak with Ms. Renee Schwartz, who was listed as the RCRA site contact on the Notification Acknowledgment/Verification Report (Verification Report) provided by EPA prior to the inspection (Attachment 1). Mr. Stender explained that Ms. Schwartz worked from home and was not available. Mr. Stender escorted me to a conference room where we were met by Mr. Dorrell approximately 10 minutes later. I explained the purpose of the CEI to Messrs. Stender and Dorrell and proceeded to conduct an entry briefing with them.

During the entry briefing, I presented my business card and EPA credentials to Messrs. Stender and Dorrell. 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. Dorrell 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 Messrs. Stender and Dorrell 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.

Copies of the following documents were left with Mr. Dorrell during the inspection:

- RCRA Facility Access Information Sheet
- RCRA Section 3007
- U.S. Federal Codes 1001 and 1002
- Instructions for Responding to a Notice of Preliminary Findings
- Notice Regarding Proprietary/Confidential Business Information

The following documents were sent electronically to Mr. Dorrell

- 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 Verification Report (Attachment 1) with Messrs. Stender and Dorrell during the CEI. Based on this review, I made no changes to the Verification Report.

I conducted a visual inspection of the facility, accompanied by Messrs. Stender and Dorrell. Following the visual inspection, I reviewed facility records including hazardous waste manifests with land disposal restriction (LDR) notifications, 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. Stender, Dorrell, and Ms. Schucht. During the exit briefing, I provided a Receipt for Documents and Samples, which Mr. Dorrell signed, acknowledging receipt (Attachment 2). I provided Mr. Dorrell the Notice, which he signed indicating no confidential business information had been provided (Attachment 3). I also provided Mr. Dorrell a Notice of Preliminary Findings (NOPF), which he signed to acknowledge receipt (Attachment 4).

Site maps obtained during the CEI are included in Attachment 5 and a Google Earth aerial photograph of the facility is included as Attachment 6. The 10 photographs taken during the CEI are in Attachment 7, all of which are described in this report.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

Quad is a manufacturer of solvent-based gravure inks for publication printing. Raw materials used in ink manufacturing include solvents (toluene and petroleum naphtha), pigments, and resinate. The facility began operation at its current location in approximately 1980. Quad occupies a footprint of approximately 37,100 square feet under roof, which includes offices, warehouse space, production area, quality control (QC) labs, and support areas such as facility maintenance and mechanical equipment rooms. The facility employs six personnel who work 6:00 a.m. to 4:00 p.m. Tuesday through Friday.

During the CEI, Mr. Stender described the manufacturing processes. He explained that gravure ink is a low-viscosity, fast-drying fluid ink used for high-speed printing of magazines, catalogs, and retail flyers/inserts. Quad manufactures concentrated inks, which are shipped in 6,000-gallon tanker trucks to a sister facility in Lomira, Wisconsin. At the Lomira location, the inks are diluted to standard concentrations and printing is performed. During the facility's busy season (July through November, corresponding to printing of back-to-school and holiday catalogs and flyers/inserts), Quad produces up to one 6,000-gallon tanker truck of concentrated ink per day.

The top floor of the facility houses offices, labs, and other non-production areas. The top floor also includes warehouse storage areas for dry materials such as pigments and resinate. Ink production is performed on the bottom floor of the facility. Dry materials are piped to the bottom floor via gravity flow into dispersion units. Ink production involves blending of pigments,

resinate, and solvent in batches. Mechanical filtration of the ink is performed for clarification of the product. Depending on ingredient quality and/or final product specifications, centrifugal filtration may also be performed.

Ink manufacturing generates ink waste, waste ink filters, QC waste, solvent-contaminated wipe, and waste metal cans. Most liquid waste generated in the ink manufacturing process is returned to the production process. Liquid wastes that cannot be returned to production are considered to be ink waste. The facility considers ink waste and waste ink filters to be hazardous waste based on product and process knowledge. These wastes are accumulated in satellite accumulation containers (SAC) and hazardous waste accumulation containers (HWAC). QC waste includes wipes and debris from the QC labs. The facility considers QC waste to be hazardous based on product and process knowledge, and accumulates the waste in a SAC container.

Solvent-contaminated wipes are generated during ink production, primarily through cleaning of equipment. These wipes are accumulated in dedicated containers and are collected by Cintas (Des Moines, Iowa) for laundering prior to being returned to the facility for reuse. The facility considers solvent-contaminated wipes to be excluded from the definition of solid waste according to Title 40 *Code of Federal Regulations* (40 CFR) 261.4(a)(26).

Retain samples of product inks are kept at the facility for QC purposes. When the retention period ends, the facility returns the retained ink to the production process. Waste metal cans that previously held retain samples are accumulated for recycling. The facility considers waste metal cans to be scrap metal that is exempt from the definition of solid waste per 40 CFR 261.6(a)(3)(ii).

Facility and equipment maintenance generates waste lamps, waste batteries, waste bags, and general refuse. The facility manages waste lamps and waste batteries as universal wastes according to 40 CFR Part 273. Waste bags consist of compacted and baled plastic bags that previously held dry products such as pigments and resinate. General refuse consists of office and packaging wastes. Waste plastic bags and general refuse are considered to be nonhazardous wastes based on product and process knowledge and transported for disposal at the Adair County Sanitary Landfill.

The fork lifts used at the facility are serviced by an outside contractor (Forklifts of Des Moines in Des Moines, Iowa). Used oil generated during servicing is immediately transported to the contractor's facility for accumulation and recycling. I did not observe used oil in accumulation at Quad during the CEI and concluded that the facility was operating as a co-generator of used oil.

QUAD was last inspected by an EPA contractor on May 12, 2021, with no preliminary findings noted during the inspection.

2. RCRA Status

The Verification Report (Attachment 1) indicates that QUAD is registered with EPA, under EPA ID IAD000669960, as a large quantity generator (LQG) of hazardous waste (generating more than 1,000 kilograms [kg] or 2,200 pounds of hazardous waste per calendar month). During the CEI, I reviewed uniform hazardous waste manifests and the facility's Hazardous Waste

Generated and Shipped spreadsheet (Attachment 8) to determine the facility's current hazardous waste generator status.

Based on manifest records, the facility had a total of eight hazardous waste shipments over the last three years. Based on the quantities of hazardous wastes shipped, QUAD appears to have been operating as a small quantity generator (SQG) of hazardous waste (generating between 100 and 1,000 kg or 220 and 2,200 pounds of hazardous waste per month) from November 2021 through June 2024. However, the facility's Hazardous Waste Generated and Shipped spreadsheet indicates an increased hazardous waste generation rate beginning in July 2024 (Attachment 8, pages 1 and 2). I asked Mr. Dorrell what caused the increased generation rate. He stated that in July 2024, QUAD received a bad shipment of resin and pigments. Finished product would not meet specifications and therefore had to be declared hazardous waste. He also stated that they are continuing to have trouble with the bad resin and pigments.

Based on the facility's Hazardous Waste Generated and Shipped spreadsheet, QUAD approached LQG status in August 2024 and crossed into LQG status in September 2024. In addition, I observed eleven 55-gallon HWACs (approximately 4,950 pounds) in accumulation at the time of the CEI with accumulation start dates of September 30, 2024, and later. This quantity of hazardous waste in accumulation indicated that the facility was also a LQG of hazardous waste in October and/or November 2024. Therefore, I determined that QUAD was operating as a LQG of hazardous waste at the time of the CEI and inspected the facility as such. I also inspected QUAD as a small quantity handler (SQH) of universal waste (accumulating less than 5,000 kg of universal waste at any time).

3. Waste Streams

This section of the CEI report describes the waste streams generated by the facility, including the facility's waste determination, generation and management processes, and ultimate disposition. The following discussion of waste streams is based on conversations with facility representatives and the visual inspection.

Ink waste consists of ink waste (ink, solvent, pigment, and/or resinate mixture) generated during ink production or equipment/vessel cleaning that cannot be returned to the production process. This includes finished product that does not meet customer specifications. The facility considers ink waste to be hazardous waste (D001) based on product and process knowledge. Copies of the SDS for Carbon Black (pigment), R-355 (resinate), and Reclaimed Solvent are included as Attachments 9 through 11. A copy of the waste profile for ink waste is in Attachment 12. Ink waste is accumulated in 55-gallon SAC in the production area, and full containers are transferred to the Pump Room hazardous waste central accumulation area (HWCAA). The waste is collected by Clean Harbors Environmental Services (Clean Harbors) and is transported to Clean Harbors in Kimball, Nebraska, or Smithfield, Kentucky, for incineration. The waste was last collected on October 8, 2024 (Attachment 13, pages 4 and 5).

During the CEI, I observed a 55-gallon SAC of ink waste in the production area near a centrifugal filter. I did not photograph the container due to the facility's restriction on photographs in the production area for safety precautions. The SAC was at the point of generation, under control of the operator, structurally sound, closed, labeled with the words

“hazardous waste” and an indication of the nature of the hazard, and held approximately 40 gallons of ink waste. I also observed a SAC of ink waste at the filling point in the Pump Room (Attachment 7, Photograph 3). The container was at the point of generation, under control of the operator, structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and held approximately 30 gallons of ink waste.

I observed eleven 55-gallon HWACs of ink waste in the Pump Room HWCAA (Attachment 7, Photographs 4 through 8). The HWACs were structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and marked with accumulation start dates. The earliest accumulation start date was September 30, 2024.

Waste ink filters consist of spent filter cartridges used for ink filtration during production. The facility considers waste ink filters to be hazardous waste (D001) based on product and process knowledge. A copy of the waste profile for ink waste is in Attachment 12. Based on manifest records from the past year, the facility generates approximately 83 pounds (38 kg) of waste ink filters per month. Waste ink filters are accumulated in 55-gallon SAC in the production area, and full containers are transferred to the Pump Room HWCAA. The waste is collected by Clean Harbors and is transported to Clean Harbors in Kimball, Nebraska, for incineration.

During the CEI, I observed a 55-gallon SAC of waste filters in the Pump Room (Attachment 7, Photographs 1 and 2). The SAC was near the point of generation, under control of the operator, structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and held approximately 30 gallons of waste filters. I observed no deficiencies regarding management of waste ink filters during the CEI.

QC waste consists of gravure ink wipes and debris generated during QC testing of raw materials and finished product. The facility considers QC waste to be hazardous waste (F005) based on product and process knowledge. Based on manifest records from the past year, the facility generates approximately 8 pounds (4 kg) of QC waste per month. QC waste is accumulated in a 55-gallon SAC in the QC labs, and full containers are transferred to the Pump Room HWCAA. The waste is collected by Clean Harbors and is transported to Clean Harbors in Kimball, Nebraska, for incineration.

During the CEI, I observed a 55-gallon SAC of QC waste in the QC labs. I did not photograph the container due to the facility’s restriction on photographs in the QC labs for safety precautions. The SAC was near the point of generation, under control of the operator, structurally sound, and closed. The SAC was labeled with the words “hazardous waste” and an indication of the nature of the hazard and held approximately 15 gallons of QC waste. I observed no deficiencies regarding management of QC waste during the CEI.

Solvent-contaminated wipes are generated throughout the facility from cleaning ink and/or solvent from equipment, vessels, containers, or personnel. The facility considers solvent-contaminated wipes to be excluded from the definition of solid waste according to 40 CFR 261.4(a)(26). The wipes are accumulated in 5-gallon containers in the production area. Every Thursday, solvent-contaminated wipes are collected from the production area by Cintas in Des Moines, Iowa, for laundering and are returned for reuse.

During the CEI, I observed the solvent-contaminated wipes accumulation containers in the production area. I did not photograph the container due to the facility's restriction on photographs in the production area for safety precautions. However, I observed the containers were structurally sound, closed, and labeled with the words "excluded solvent-contaminated wipes." The wipes within the containers appeared to be dry and no free liquids were noted in the containers.

During the records review, I noted that the facility tracks accumulation times and collection dates for solvent-contaminated wipes and keeps all documentation required to maintain the solid waste exclusion. I noted no deficiencies regarding management of excluded solvent-contaminated wipes during the CEI.

Waste metal cans are generated during recycling of ink retain samples. Samples of ink product are retained at the facility for QC purposes. When the retention period ends, the retain sample is recycled back through the production process. Empty metal cans that previously held retain samples are accumulated in a 1-cubic-yard fiberboard container in the storage building. The facility manages waste metal cans as scrap metal that is exempt from the definition of solid waste per 40 CFR 261.6(a)(3)(ii). Based on manifest records, the facility generates approximately 216 pounds of waste metal cans per year. Waste metal cans are collected by Clean Harbors and transported to Clean Harbors in Kimball, Nebraska, for recycling. During the CEI, I observed waste metal cans in accumulation and noted no deficiencies.

Waste lamps are generated during facility maintenance, and include fluorescent, compact fluorescent and high-intensity discharge (HID) lamps. The facility manages all waste lamps as universal waste according to provisions of 40 CFR Part 273. Waste lamps are accumulated in universal waste accumulation containers in the Mechanical Equipment Room. Based on invoice records, the facility generates approximately 10 waste lamps per year. Waste lamps are collected by A-TEC Recycling in Pleasant Hill, Iowa, for recycling. The waste was last collected on July 2, 2024 (Attachment 14).

During the CEI, I observed one fiberboard container of waste lamps in the Mechanical Equipment Room (Attachment 7, Photograph 10). The container was structurally sound, closed, labeled with the words "universal waste lamps," dated October 8, 2024, and held five HID waste lamps. I observed no deficiencies regarding management of waste lamps during the CEI.

Waste batteries are generated during equipment maintenance and include lead-acid, lithium, and alkaline batteries. The facility manages all waste batteries as universal waste according to provisions of 40 CFR Part 273. Waste batteries are accumulated in universal waste accumulation containers in the Mechanical Equipment Room. Based on invoice records, the facility generates approximately 12 pounds of waste batteries per year. Waste batteries are collected by A-TEC Recycling in Pleasant Hill, Iowa, for recycling. The waste was last collected on July 2, 2024 (Attachment 14). I did not observe any waste batteries in accumulation during the CEI.

Waste bags consist of plastic packaging for dry products used in the ink manufacturing process, such as pigments and resinate. The facility considers waste bags to be nonhazardous waste based on product and process knowledge. Waste bags are placed into an onsite compactor and baled. The waste is collected by Clayton Auto Salvage in Greenfield, Iowa, and transported to the Adair County Sanitary Landfill for disposal. During the CEI, I observed the compactor/baler for waste bags and noted no deficiencies.

General trash consists of office- and packaging-type refuse generated at the facility. The facility considers general trash to be nonhazardous waste based on product and process knowledge. General trash is accumulated in several containers throughout the facility. The waste is collected by Clayton Auto Salvage in Greenfield, Iowa, and transported to the Adair County Sanitary Landfill for disposal. 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 consisting 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 Area

Quad maintains one HWCAA in the Pump Room. The Pump Room was designed for flammable liquid storage and is bermed with a blind sump for spill containment. At the time of the CEI, the HWCAA held 11 HWACs of ink waste (Attachment 7, Photographs 4 through 8). Based on the arrangement of the HWACs in the HWCAA, I determined the facility failed to maintain adequate aisle space for unobstructed movement of personnel and emergency response equipment, as required by 40 CFR 262.17(a)(6) referencing 262.255 (**NOPF No. 4**).

NOPF No. 4 was not initially left with the facility at the conclusion of the CEI but was added on December 6, 2024. Ms. Schucht and Mr. Dorrell were notified of its addition by email on December 6, 2024.

I asked Mr. Stender if the facility inspected the HWCAA. He stated that the HWCAA is inspected weekly and no inspection log is maintained.

I asked Mr. Dorrell how someone would summon emergency assistance. He stated that all personnel who manage hazardous waste carry two-way radios and that there is a telephone available in the HWCAA. I observed the telephone in the HWCAA during the CEI (Attachment 7, Photograph 9).

6. Manifests and Biennial Report

QUAD generated 8 uniform hazardous waste manifests for waste shipments from November 20, 2021, through November 20, 2024. I reviewed all 8 manifests during the CEI and noted no discrepancies. Copies of manifests and LDRs for shipments on January 25, July 2, October 8, 2024, are included in Attachment 13.

QUAD did not submit a Hazardous Waste Biennial Report for 2023 because the facility was operating as a SQG of hazardous waste in 2023.

7. Preparedness and Prevention

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. Dorrell, QUAD is the subject of a regular inspection by the Greenfield Fire Department hazardous materials team. During those inspections, he said the fire department is shown the layout of the facility, the location of the hazardous waste HWCAA, and other facility features.

During the CEI, I reviewed the facility's contingency plan, which was emailed to Mr. Dorrell during the CEI (Attachment 15). Ms. Schucht stated during a phone conversation that what I was provided was the contingency plan that was under review at corporate.

I reviewed the contingency plan against the content requirements of 40 CFR 262.261. The contingency plan included a general description of actions needed to respond to fires, spills, and other emergency situations, description of arrangements with the local emergency agencies, and an evacuation plan with a description of the signals used. However, the contingency plan I was provided during the CEI did not include the following:

- Description of actions needed to respond to explosions, as required by 40 CFR 262.17(a)(6) referencing 262.261(a)
- List of names and telephone numbers of emergency coordinators, as required by 40 CFR 262.17(a)(6) referencing 262.261(d)
- List of emergency response equipment with locations and capabilities, as required by 40 CFR 262.17(a)(6) referencing 262.261(e)

I determined the facility did not have an adequate contingency plan, as required by 40 CFR 262.17(a)(6) referencing 262.260(a) (**NOPF No. 2**).

I noted the contingency plan had the beginnings of a Quick Reference Guide on page 1. I asked Ms. Schucht if the facility has a separate Quick Reference Guide. She stated that the facility did not have a Quick Reference Guide. I determined the facility failed to prepare and submit a Quick Reference Guide, as required by 40 CFR 262.17(a)(6)—262.262(b) (**NOPF No. 3**). I provided compliance assistance regarding contingency plan and Quick Reference Guide requirements during the CEI.

8. Personnel Training Requirements

Personnel training is required by LQG regulations specified in 40 CFR 262.17(a)(7)(i)(A) to ensure that employees are thoroughly familiar with proper waste handling procedures relevant to their responsibilities. QUAD provides annual training to personnel who handle and manage hazardous waste. Copies of the training records for Renee Schwartz, Rick Stender, and Doug Dorrell are included in Attachment 16.

I asked Ms. Schucht for a copy of the job description for Mr. Dorrell (Attachment 17). I reviewed the job description and noted that it did not include the skills, education, or qualifications of the position or list the type and amount of introductory and continuing training for the position, as required by 40 CFR 262.17(a)(7)(iv)(B) and (C) (**NOPF No. 1**). I provided compliance assistance regarding training documentation requirements during the CEI.

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. QUAD 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. QUAD 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 QUAD 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.

10. Summary of Preliminary Findings

In summary, as part of the CEI, I made the following preliminary findings:

- (1) Failure to include the skills, education, or qualifications of the position or list the type and amount of introductory and continuing training for the position in written job descriptions, as required by 40 CFR 262.17(a)(7)(iv)(B) and (C) **(NOPF No. 1)**
- (2) Failure to have an adequate contingency plan, as required by 40 CFR 262.17(a)(6) referencing 262.260(a) **(NOPF No. 2)**
- (3) Failure to prepare and submit a Quick Reference Guide, as required by 40 CFR 262.17(a)(6)—262.262(b) **(NOPF No. 3)**
- (4) Failure to maintain adequate aisle space for unobstructed movement of personnel and emergency response equipment, as required by 40 CFR 262.17(a)(6) referencing 262.255 **(NOPF No. 4)**

NOPF No. 4 was not left at the facility but was added on December 6, 2024. Ms. Schucht and Mr. Dorrell were notified of its addition by email on December 6, 2024.

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: 2025.01.17
10:35:23 -06'00'

Clifford A. Nelles, Inspector
CLAENE Group

AMBER WHISNANT

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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. Notice of Preliminary Findings (1 page)
5. Site Maps (2 pages)
6. Google Earth Aerial Photograph of Facility (1 page)
7. Photographic Documentation (Photolog and 10 Photographs) (7 pages)
8. Copy of Hazardous Waste Generated for 2022, 2023, and 2024 (5 pages)
9. Copy of SDS for Carbon Black (22 pages)
10. Copy of SDS for R-355 (7 pages)
11. Copy of SDS for Reclaimed Solvent (10 pages)
12. Copy of Waste Profile for Ink Waste (3 pages)
13. Copy of Manifests and LDRs for Shipments Dated January 25, July 2, and October 8, 2024 (5 pages)
14. Copy of Certificate of Recycling from A-TEC Recycling Dated July 2, 2024 (1 page)
15. Copy of Contingency Plan (11 pages)
16. Copy of Training Records for Renee Schwartz, Doug Dorrell, and Rick Stender (2 pages)
17. Copy of Job Description for Ink Maker-Rotogravure (1 page)