

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

3M KNOXVILLE
3406 E. Pleasant St.
Knoxville, Iowa 50138
712-623-8100 ext.6684

EPA ID Number: IAD075846824

On

March 1, 2023

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 3M Knoxville (3M) at 3406 E. Pleasant St., Knoxville, Iowa. The CEI was conducted under the authority of Section 3007 of 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

3M:

Peter Thomas, EHS Manager
Jason Stephenson, Plant Director (exit briefing only)
Travis Loscher, Working Lead

Toeroek Team:

Clifford Nelles, Inspector, 816-213-5192

INSPECTION PROCEDURES

Prior to the CEI at 3M on March 1, 2023, 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 lobby at 3M and informed the receptionist that I was there to conduct a CEI. The receptionist contacted Mr. Thomas, who met me in the lobby. After brief introductions, I explained the purpose and scope of the CEI to Mr. Thomas. Mr. Thomas and I adjourned to his office where I proceeded to conduct an entry briefing with Mr. Thomas.

During the entry briefing, I presented my business card and EPA credentials to Mr. Thomas. 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. Thomas 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. Thomas with 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 he read.

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

- RCRA Facility Access Information Sheet
- Mr. Trevor Urban's business card
- 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
- 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. Thomas (Attachment 1). Based on this review, I changed the site contact to Ms. Amy Allen and the Plant Director to Mr. Stephenson. I made no other changes to the Verification Report.

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

A map of the facility obtained during the CEI is included in Attachment 5, and a Google Earth aerial photograph of the facility is included as Attachment 6. Because of health and safety concerns regarding potentially explosive atmospheres, Mr. Thomas explained that photographs could only be taken with an intrinsically safe camera. I was unable to use my camera during the CEI. However, 3M supplied an intrinsically safe camera and Mr. Thomas took photographs at my direction. All 18 photographs taken during the CEI are included in Attachment 7, 17 of which are used in this report.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

3M manufactures industrial adhesive tapes and films. Major raw materials used by the facility include paper and plastic liners, solvents, resins, adhesives, and coatings.

The facility generates a variety of spent solvents from the cleaning of rollers, knives, tools, and other manufacturing equipment. Solvents used by the facility include isopropyl alcohol (IPA), methyl ethyl ketone (MEK), methanol, toluene, ethyl acetate, xylene, and heptane. Spent solvents are considered as listed and characteristic hazardous waste. They are segregated into two waste streams, one of which is destined for incineration at the 3M treatment, storage, and disposal facility (TSDF) in Cottage Grove, Minnesota, and one of which is sent to Clean Harbors Environmental Services in Kimball, Nebraska. The facility also generates solvent debris, which is also considered hazardous waste. Solvent debris includes a variety of solid wastes that have come into contact with spent solvent, including personal protective equipment (PPE), empty containers, masking, and spill cleanup materials. Manufacturing also generates waste acrylic acid which the facility has determined to be nonhazardous.

Product testing in the facility's laboratories generates solvent debris and spent solvent for incineration. These wastes are considered hazardous based on product knowledge, and are consolidated with wastes from the manufacturing processes.

Facility and equipment maintenance generates used oil, used lamps, used batteries, and general trash. The facility manages used oil as hazardous waste due to its contact with solvents containing lead (cutting fluids). Used oil is transported to the 3M TSDF in Cottage Grove, Minnesota, for incineration. Used lamps and used batteries are managed as universal waste according to provisions of Title 40 *Code of Federal Regulations* (40 CFR) Part 273 and are recycled. General trash is managed as nonhazardous waste and is transported to the Marion County Landfill for disposal.

3M began operations in 1974 and currently has approximately 615 full-time employees. Mr. Thomas stated that the facility runs four shifts of various durations, 7 days a week. Based on my review of aerial photographs, the 3M facility consists of a single manufacturing building with approximately 640,000 square feet under roof on approximately 174 acres.

3M was last inspected by EPA on February 26-27, 2018, with the following findings:

- Failure to operate the facility to minimize releases
- Failure to label a satellite accumulation container with the words “hazardous waste.”

Of these findings, failure to label a satellite accumulation container with the words “hazardous waste” was repeated during this CEI.

2. RCRA Status

The Verification Report provided by EPA (Attachment 1) indicates that 3M is registered with EPA, under EPA ID IAD075846824, as a large quantity generator (LQG) of hazardous waste (generating more than 1,000 kilograms [kg] of hazardous waste per month. Through a review of current operations, interview with Mr. Thomas, review of waste disposal records (manifests and tracking records), and observations during the visual inspection, I verified the facility is operating as a LQG of hazardous waste.

3M generates two primary hazardous waste streams—spent solvents and solvent debris. Based on the facility’s 2021 Hazardous Waste Biennial Report (Attachment 8) and dividing the total annual generation by 12 months, I calculated the facility generated approximately 60,464 pounds (27,464 kg) of spent solvent and 23,024 pounds (10,444 kg) of solvent debris per month. The magnitude of hazardous waste generation was generally confirmed by the facility’s shipping quantities from January and February 2023 (Attachment 9). 3M’s hazardous waste generation rate for these primary waste streams is easily above the 1,000 kg per month threshold for LQG status. Therefore, I inspected the facility as a LQG of hazardous waste. I also inspected the facility 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 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. Mr. Thomas accompanied me during the visual inspection. Mr. Loscher joined the CEI during the visual inspection of the HWCAA. All inspection participants were provided a copy of U.S. Federal Codes 1001 and 1002, which they read.

Spent solvents for recycling are generated from maintenance of rollers and other manufacturing equipment. The facility considers the waste hazardous (D001, D018, D035, F003, F005, and/or other waste codes as applicable) based on product and process knowledge. Copies of the SDSs for solvents used at the facility (toluene, heptane, ethyl acetate, and MEK) are included as Attachments 10 through 13, respectively. Based on the 2021 Biennial Report (Attachment 8), the facility generates approximately 37,440 pounds of spent solvent for recycling per month. The waste is accumulated in 55-gallon satellite accumulation containers (SACs), and full SACs are transferred to a hazardous waste container accumulation area (HWCAA) at location Red Label R5 (RLR5). Spent solvent for recycling is collected by Clean Harbors and transported to the Clean Harbors TSDF in Kimball, Nebraska, for fuel blending.

During the CEI, I observed 55-gallon SACs of spent solvent for recycling at the following locations:

- 1N manufacturing area (two SACs) (Attachment 7, Photographs 1 through 3)
- 2NB manufacturing area (three SACs) (Attachment 7, Photograph 4, 5, and 7)
- 4-1 2NB manufacturing area

The volume of hazardous waste in each satellite accumulation area was less than 55 gallons. Each SAC was at or near the point of generation and under control of the operator. Each SAC was structurally sound, labeled with the words “hazardous waste,” and labeled with an indication of the nature of the hazard. With the exception of SAC #2 in the 2NB manufacturing area, the SACs were closed. SAC #2 in the 2NB manufacturing area held approximately 20 gallons of waste and was not closed (Attachment 7, Photograph 4). Waste was not being actively added to the SAC. Therefore, I determined the facility failed to keep a SAC closed, as required by 40 CFR 262.15(a)(4) (**NOPF No. 5**).

I inadvertently neglected to include NOPF No. 5 on the NOPF form left with the facility during the CEI. NOPF No. 5 was added on March 17, 2023, and Mr. Thomas and Ms. Allen were notified by email at that time. I provided compliance assistance regarding management of SACs during the CEI, and employees of 3M closed the SAC (Attachment 7, Photograph 6).

Spent solvents for incineration are generated from maintenance of rollers and other manufacturing equipment. Spent solvents for incineration include IPA, MEK, toluene, ethyl acetate and xylene. The facility considers the waste hazardous (D001, D035, F003, F005, and/or other waste codes as applicable) based on product and process knowledge. Based on the 2021 Biennial Report (Attachment 8), the facility generates approximately 23,024 pounds of spent solvent for incineration per month. The waste is accumulated in 55-gallon SACs, and full SACs are transferred to the RLR5 HWCAA. The waste is transported to the 3M TSDF in Cottage Grove, Minnesota, for incineration.

During the CEI, I observed 55-gallon SACs of spent solvent for incineration at the following locations:

- 2-1 knife area
- 3-1 9N manufacturing area
- 4-1 1N manufacturing area
- 4-1 mix area
- Compounding Room 3 (two SAAs) (Attachment 7, Photographs 13 and 14)

The volume of hazardous waste in each satellite accumulation area was less than 55 gallons. Each SAC was at or near the point of generation and under control of the operator. Each SAC was structurally sound, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and closed.

I also observed a 55-gallon SAC of spent solvent for incineration at Compounding Room 1 and Compounding Room 5. The SAC at Compounding Room 1 held approximately 15 gallons of waste and the SAC at Compounding Room 5 held approximately 10 gallons of waste. Each SAC was at or near the point of generation, under control of the operator, structurally sound, and closed. However, the two SACs were unlabeled (Attachment 7, Photographs 9, 10, and 15). I determined the facility failed to label two SACs with an indication of the nature of the hazard, as required by 40 CFR 262.15(a)(5)(ii) (**NOPF No. 1**). I also determined the facility failed to label two SACs with the words “hazardous waste,” as required by 40 CFR 262.15(a)(5)(i) (**NOPF No. 2**).

I provided compliance assistance regarding management of SACs during the CEI. During the CEI, employees of 3M affixed a hazardous waste and hazard labeling to the SAC in Compounding Room 1 (Attachment 7, Photograph 12).

Laboratory waste is generated during product testing in the laboratory in the 7N area or the Main Coating Lab. The facility considers the waste hazardous (D001, F003, F005) based on product and process knowledge. The facility generates approximately 30 pounds of laboratory waste per month. Laboratory waste is accumulated in a 5-gallon SAC in the labs, and the SACs are emptied into a 55-gallon hazardous waste accumulation container (HWAC) adjacent to the Main Coating Lab. The waste is consolidated with spent solvent for recycling and is transported to the Clean Harbors TSDF in Kimball, Nebraska, for fuel blending.

During the CEI, I observed a SAC in the laboratory in the 7N area (Attachment 7, Photograph 8). The 5-gallon SAC was near the point of generation, under control of the operator, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and held approximately 2 gallons waste. The SAC is emptied each day into a 55-gallon HWAC adjacent to the main coating laboratory (Attachment 7, Photograph 18). The 55-gallon HWAC was structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and marked with an accumulation start date of December 19, 2022. I noted no deficiencies with management of laboratory waste.

Solvent debris is generated when solid wastes such as PPE, empty containers, masking, and spill response materials come into contact with spent solvents. The facility considers the waste hazardous (D001, D008, D035, F003, F005) based on product and process knowledge. Based on the 2021 Biennial Report (Attachment 8), the facility generates approximately 4,023 pounds of solvent debris per month. The waste is accumulated in 55-gallon SACs, and full SACs are transferred to the RLR5 HWCAA. The waste is transported to the 3M TSDF in Cottage Grove, Minnesota, for incineration.

During the CEI, I observed 55-gallon SACs of solvent debris at the following locations:

- 5-1 milling area
- 4-1 12NB manufacturing area

The volume of hazardous waste in each satellite accumulation area was less than 55 gallons. Each SAC was at or near the point of generation and under control of the operator. Each SAC was structurally sound, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and closed. I noted no deficiencies with management of solvent debris during the CEI.

Aerosol cans are generated from maintenance of facility equipment and buildings. The facility considers used aerosol cans hazardous (D001, D005, D035) based on product and process knowledge. Based on the 2021 Biennial Report (Attachment 8), the facility generates approximately 151 pounds of aerosol cans per month. The waste is accumulated in a 55-gallon SAC, and full SACs are transferred to the RLR5 HWCAA. The waste is transported to the 3M TSDF in Cottage Grove, Minnesota, or the Clean Harbors TSDF in Kimball, Nebraska, for recycling or disposal

During the CEI, I observed a 55-gallon SAC of aerosol cans in Compounding Room 5. 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, and closed. I noted no deficiencies with management of aerosol cans during the CEI.

Used oil is generated during the maintenance of facility machines. The facility has determined that used oil is hazardous (D008) based on product and process knowledge since the waste comes into contact with spent solvents containing lead (cutting fluid). Based on the 2021 Biennial Report (Attachment 8), the facility generates approximately 166 pounds of used oil per month. The waste is accumulated in 55-gallon HWACs in the maintenance shop, and is transported to the 3M TSDF in Cottage Grove, Minnesota, for incineration. I did not observe used oil in accumulation during the CEI.

Universal waste lamps are generated by maintenance personnel replacing spent lamps. The facility manages spent lamps as universal waste according to provisions of 40 CFR Part 273. Universal waste lamps are accumulated in universal waste accumulation containers in the maintenance shop, and are transported to the 3M TSDF in Cottage Grove, Minnesota, for recycling.

During the CEI, I observed a universal waste accumulation container that held approximately 75 universal waste lamps. The container was closed, labeled with the words “universal waste lamps,” and marked with an accumulation start date of October 31, 2022. I noted no deficiencies with management of universal waste lamps during the CEI.

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 and transported to the South Central Iowa Solid Waste Agency in Tracy, 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

3M maintains two HWCAAs, one at RLR5 and another adjacent to the Main Coating Laboratory. I observed one 55-gallon HWAC of laboratory waste in the HWCAA adjacent to the Main Coating Laboratory (Attachment 7, Photograph 18). The HWAC was structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and held approximately 25 gallons of waste. The HWAC was marked with an accumulation start date of December 19, 2022.

At the RLR5 HWCAA, I observed approximately twenty-seven 55-gallon HWACs (Attachment 7, Photographs 16-17). All of the HWACs were structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and full. All HWACs were marked with accumulation start dates, and the oldest date was February 4, 2023.

I asked Mr. Loscher if the HWCAAs are inspected. He stated that he conducted the inspections at both of the HWCAAs on a weekly basis. I asked Mr. Loscher if he maintained an inspection log. He stated that he does not maintain an inspection log or otherwise document the inspections. I asked Mr. Loscher how someone would summon emergency assistance in the HWCAAs. He stated that all of the workers in hazardous waste carried two-way radios.

6. Manifests and Biennial Report

3M generated manifests for 136 hazardous waste shipments from March 1, 2020, to March 1, 2023. During the CEI, I reviewed manifests and LDR notifications for five shipments in 2020, five in 2021, five in 2022, and six in 2023. Copies of the manifest and LDR for a shipment dated February 2, 2023, and a manifest for a shipment dated February 13, 2023, are

included in Attachment 14. The facility submitted its 2021 Biennial Report in February 2022 (Attachment 8). I noted no deficiencies during my review of manifests, LDR notifications, and the 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. Thomas, 3M is the subject of a regular inspection by the Knoxville Fire Department hazardous materials team. He explained the fire department is shown the layout of the facility, the location of the hazardous waste HWCAAs, and other facility features during inspections.

During the CEI, I reviewed the facility's Contingency Plan against the Contingency Plan content requirements of 40 CFR 262.261. I noted that the contingency plan appeared to meet most of the content requirements, including a Quick Reference Guide. However, the Contingency Plan did not include a complete evacuation plan including route, signal, and alternate route, as required by 40 CFR 262.17(a)(6) referencing 262.261(f) (**NOPF No. 3**). In addition, the Contingency Plan did not provide descriptions of actions needed to respond to fires or explosions, as required by 40 CFR 262.17(a)(6) referencing 262.261(a) (**NOPF No. 4**). Copies of the facility's Contingency Plan and Quick Reference Guide are included as Attachments 15 and 16. I provided compliance assistance regarding Contingency Plan content during the CEI.

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. Thomas 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 weeks of hiring or being assigned to a job that handles hazardous waste. He also stated that annual refresher training is conducted. I asked Mr. Thomas who conducts the training. He stated that all training is conducted online. I reviewed the training records for the last three years for Mr. Loscher, Mr. Corey Fitzgerald, and Ms. Julie Brown (production workers who handle hazardous waste). Copies of training records for Messrs. Loscher and Fitzgerald and Ms. Brown are included in Attachment 17. I reviewed the written job descriptions for Messrs. Loscher, Fitzgerald, and Ms. Brown and noted that the job descriptions did not list the amount of introductory and continuous training as required by 40 CFR 262.17(a)(7)(iv)(C) (**NOPF No. 6**). A copy of the Job Description for an IATD Solvent Coating Working Lead is included as Attachment 18.

I inadvertently neglected to include NOPF No. 6 on the NOPF form left with the facility during the CEI. NOPF No. 6 was added on March 17, 2023, and Mr. Thomas and Ms. Allen were notified by email at that time.

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. 3M 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. 3M 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 hazardous waste accumulation containers. During the CEI, I determined that 3M meets the Subpart CC requirements for containers by using Container Level 1 controls (hazardous waste accumulation containers 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 label two satellite containers with an indication of the nature of the hazard, as required by 40 CFR 262.15(a)(5)(ii) **(NOPF No. 1)**.
- (2) Failure to label two satellite containers with the words “hazardous waste” as required by 40 CFR 262.15(a)(5)(i) **(NOPF No. 2)**.
- (3) Failure to list a complete evacuation plan including route, signal, and alternate route in the Contingency Plan, as required by 40 CFR 262.17(a)(6) referencing 262.261(f) **(NOPF No. 3)**
- (4) Failure in the contingency plan description of actions needed to respond to fires or explosions, as required by 40 CFR 262.17(a)(6) referencing 262.261(a) **(NOPF No. 4)**
- (5) Failure to keep a satellite container closed except when adding or temporarily venting waste, as required by 40 CFR 262.15(a)(4) **(NOPF No. 5)**
- (6) Failure in the job description to list the amount of introductory and continuous training as required by 40 CFR 262.17(a)(7)(iv)(C) **(NOPF No. 6)**

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

Digitally signed by Clifford
A. Nelles
Date: 2023.04.27
14:28:34 -05'00'

Date: _____

Clifford A. Nelles, Inspector
CLAENE Group

AMBER WHISNANT

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Date: 2023.04.28
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Amber Whisnant, Section Chief
ECAD/CB/RCRA, EPA Region 7

Attachments:

1. Hazardous Waste Site Info Verification Report for Inspector (2 pages)
2. Receipt for Documents and Samples (1 page)
3. Confidentiality Notice (1 page)
4. Notice of Preliminary Findings (1 page)
5. Site Map (1 page)
6. Google Earth Photograph of Facility (1 page)
7. Photographic Documentation (Photolog and 18 Photographs) (12 pages)
8. Copy of 2021 Biennial Report (36 pages)
9. Copy of email from Peter Thomas dated March 16, 2023 (1 page)
10. Copy of SDS for Toluene (15 pages)
11. Copy of SDS for Heptane (9 pages)
12. Copy of SDS for Ethyl Acetate (8 pages)
13. Copy of SDS for Methyl Ethyl Ketone (12 pages)
14. Copy of Manifest for Shipments dated February 2 and 13, 2023 (8 pages)
15. Copy of RCRA Contingency Plan (20 pages)
16. Copy of Quick Reference Guide (6 pages)
17. Copy of Travis Loscher, Corey Fitzgerald, and Julie Brown training records (2 pages)
18. Copy of Job description for IATD Solvent Coating Working Lead (2 pages)