

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

Honeywell Elster American Meter Company, LLC

2221 Industrial Road
Nebraska City, NE 68410
(402) 873-8200

EPA ID Number: NED007265077

On

July 26-27, 2023

By

Eastern Research Group, Inc.

For

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region 7

Enforcement and Compliance Assurance Division

1.0 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, Eastern Research Group, Inc. (ERG) conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Honeywell Elster American Meter Company, LLC (Honeywell) in Nebraska City, Nebraska on July 26-27, 2023. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. Throughout the CEI, data and information were collected to determine compliance with the applicable regulatory and statutory requirements. The inspection report and attachments present the results of the CEI.

2.0 PARTICIPANTS

Honeywell:

Chris Hayward, Senior Plant Director

Resul Orazov, Senior HSE Engineer

Belinda Fowler-Hagen, Senior HSE Engineer

Heather Williamson, Senior AUE Engineering Manager

Cory Thompson, HPS SETS Environmental Business Implementation Lead

NDEE Representative:

Mark Henning, Program Specialist, NDEE

EPA Representatives:

Kimberly Chavez, Life Scientist, EPA HQ

Joseph Watson, Senior Chemical Engineer, Contractor

Janosh Wolters, Energy Engineer, Contractor

3.0 INSPECTION PRECEDURES

On July 26, 2023, Ms. Kimberly Chavez and Mr. Mark Henning arrived unannounced at the Honeywell facility at approximately 12:15 pm. Ms. Chavez and Mr. Henning introduced themselves and presented their inspector credentials to the Honeywell team and explained my reason for being on site is to conduct a RCRA CEI and asked to meet with the facility personnel who manages hazardous waste on site. Ms. Chavez stated that inspectors Janosh Wolters and Joseph Watson would be arriving shortly and she initiated the opening conference. Mr. Janosh Wolters and Mr. Joseph Watson arrived at Honeywell at approximately 1:15 pm after performing a drive-by visual inspection of the facility that did not note any areas of concern. Mr. Watson and Mr. Wolters signed into the facility's visitors log and then joined Ms. Chavez and Mr. Henning in the conference room. We were greeted by the Honeywell team including Mr. Chris Hayward, the senior plant director. We introduced ourselves and presented our inspector credentials to the Honeywell team. I presented a copy of RCRA Section 3007(a), which contains EPA's inspection authority. I next explained my need to collect accurate information and presented them with a copy of Title 18 U.S. Code, Sections 1001 and 1002. I then presented the Honeywell team with a copy of the *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections* and reviewed Honeywell's confidentiality rights. I informed Mr. Hayward that he would provide a *Confidentiality Notice* at the end of this inspection.

The inspection consisted of a discussion of facility operations, waste generation and waste management, a review of waste management records, and a visual inspection of the waste generation and management areas. Mr. Hayward provided a facility layout (see Attachment 1) and explained facility operations and locations of hazardous waste generation and management. A list of personnel who participated in the inspection is included in Attachment 2.

During the visual inspection of the facility, Mr. Hayward guided us throughout the facility in order to conduct thorough evaluations of the facility's satellite accumulation areas (SAAs) and central accumulation areas (CAAs). At the time of the inspection, the facility was operating thirty SAAs and two CAAs. The facility also handles universal waste lamps and batteries in one area on site. The universal waste storage area was visually inspected. The inspection team conducted an in-depth visual inspection of the SAAs, the CAA, and all manufacturing areas.

Thirty-eight photographs were collected as inspection documentation and are shown in Attachment 3. Information collected during the inspection is documented on the *EPA Inspection Checklist* (see Attachment 4). I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.01E), unless noted differently.

At the conclusion of the inspection, I provided Mr. Hayward with a *Confidentiality Notice*, and *Receipt for Documents and Samples*, which he signed as acknowledgement of receipt (see Attachments 5 and 6, respectively). No confidentiality claims were made by Honeywell.

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

Honeywell began manufacturing in 1953 and currently employs approximately 586 people. The facility operates 24 hours a day (four shifts for maintenance, three shifts for assembly, seven days a week). The facility has a footprint of approximately 30 acres, with 227,657 square feet of manufacturing space and 42,587 square feet of office space. Honeywell manufactures residential and commercial gas meters and regulators. The manufacturing process includes machining, cleaning parts prior to painting, urethane and polyester painting, forming rubber diaphragms, assembly, and testing. Honeywell operates four paint lines inside of their paint kitchens with automated solvent flushing. Honeywell no longer conducts casting operations on site. A process flow diagram is provided as Attachment 7.

4.2 RCRA Status

According to RCRAInfo, Honeywell notified as a federal Large Quantity Generator (LQG) of D001, D002, D003, D005, D006, D007, D008, D018, D019, D021, D028, D029, D035, D039, D040, F003, F005, F019, and U220 hazardous wastes. Mr. Wolters asked the Honeywell team if these hazardous waste codes were accurate. The Honeywell team responded that to the best of their knowledge these hazardous waste codes were accurate. After reviewing the records and walking through the facility, I determined that the facility is operating as a federal LQG of characteristic and listed hazardous wastes, a generator of used oil, and a small quantity handler of universal waste. Honeywell generates more than 1,000 kilograms of hazardous waste monthly based on a review of facility records, a visual inspection of process and waste management areas, and interviewing personnel.

Honeywell was previously inspected by the NDEE from July 29, 2019 - August 1, 2019. The inspection led to a Letter of Warning and violations observed included:

1. Failure to submit a copy of the contingency plan and all revisions to the plan to, all local police and/or fire departments, hospitals and state and local emergency response teams that may be called upon to provide emergency services.
2. Failure to maintain waste lamps in a closed structurally sound container.
3. Disposing of empty aerosol cans generated at the site a hazardous waste, applying a variety of toxic metals waste codes in addition to ignitability but not applying the characteristic of reactivity (D003) due to the potential for detonation or explosive reaction if subject to a strong initiating source or heated under confinement.
4. Many of the hazardous waste manifests were less than legible and corrections or deletions were rarely made correctly.
5. Weekly inspections that were performed documented a high incidence of repeated open

containers in the facility found during inspections. Actions taken were documented concerning the repeated occurrences but did not resolve the ongoing and recurring deficiency.

4.3 Facility Waste Streams and Management

A Waste Stream and Waste Handling Table for Honeywell facility is presented below. The table describes waste streams generated, generation process/rates, hazardous waste determinations, and on-site/off-site management.

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#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
1	Waste Flammable Liquids	Painting operations and cleaning	D001, D005, D006, D035, F003, F005 (based on process knowledge and knowledge of the product, see Attachments 8 to 12)	15,000 pounds per year	55-gallon containers	American Meter Co. in Nebraska City, NE (NED007265077) to Clean Harbors Environmental Solutions to Clean Harbor in LaPorte, TX (TXD982290140)
2	Waste Aerosol Cans	Miscellaneous production and maintenance activities	D001, D003, D005, D006, D007, D008, D035, D039, D040 (based on process knowledge and knowledge of the product)	Two 55-gallon containers/year	55-gallon containers	American Meter Co. in Nebraska City, NE (NED007265077) to Veolia ES Technical Solutions to Veolia ES Technical Solutions in Menomonee Falls, WI (WID9003967148)
3	Wastewater Treatment Sludge	Removal of sludge from process wastewater on site	F019 (based on process knowledge, see Attachment 8)	Approximately 8,000 pounds per year	Super sacks	American Meter Co. in Nebraska City, NE (NED007265077) to Veolia ES Technical Solutions to Basin Transportation to Elemental ENV Solutions in Arkadelphia, AR (TARD006354161)

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
4	Brass Coolant	Die cast coolant, waste generated through process	D008	Casting no longer being conducted on site	No longer managed on site	American Meter Co. in Nebraska City, NE (NED007265077) to Veolia ES Technical Solutions to Basin Transportation to Elemental ENV Solutions in Arkadelphia, AR (TARD006354161)
5	Spent Parts Washer Solution	Process and maintenance parts cleaning	Nonhazardous (based on process knowledge, knowledge of the product, and analytical testing)	Replaced as needed.	Eleven 35-gallon parts washer reservoirs	Serviced by Safety-Kleen of Omaha, NE (NED981495724)
6	Waste Lamps (Universal Waste)	Equipment and maintenance	Exempted (managed as universal waste per 40 CFR 273)	Approximately 500 lbs./year	Various containers	American Meter Co. in Nebraska City, NE (NED007265077) to Veolia ES Technical Solutions to Veolia ES Technical Solutions in Port Washington, WI (WID988566543)
7	Waste Batteries (Universal Waste)	Equipment and office maintenance	Exempted (managed as universal waste per 40 CFR 273)	Approximately 500 lbs./year	Various containers	American Meter Co. in Nebraska City, NE (NED007265077) to Veolia ES Technical Solutions to Veolia ES Technical Solutions in Port Washington, WI (WID988566543)

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
8	Waste Electronic Equipment (Universal Waste)	Equipment and office maintenance	Exempted (managed as universal waste per 40 CFR 273)	Approximately two tons per year	Pallet boxes	American Meter Co. in Nebraska City, NE (NED007265077) to Old Dominion Freight Line, Inc. to Global Electronic Recycling LLC in Phoenix, AZ (see Attachment 13)
9	Used Oil	Repair and maintenance of equipment and air compressors	Exempted (managed as used oil per 40 CFR 279)	Approximately 1,000 gallons per year	55-gallon containers	American Meter Co. in Nebraska City, NE (NED007265077) to Veolia ES Technical Solutions to Veolia ES Technical Solutions in West Carrollton, OH (OHD093945293) (see Attachment 14)
10	Scrap Metal	Productions operations and maintenance	Nonhazardous (based on process knowledge and knowledge of the product)	Ten tons per month	Various container sizes	360 Materials Group in Freeport, IL (see Bill of Lading Attachment 15)
11	General Trash	Facility operations	Nonhazardous (based on process knowledge and knowledge of the product, see Attachment 16)	Two roll-off containers picked up twice weekly	Two roll-off containers	Loess Hills Regional Sanitary Landfill (IAD000678185) (see FRS Facility Detail Report Attachment 17)

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4.4 Less-Than-90-Day Hazardous Waste Accumulation Areas

Honeywell has two Less-Than-90-Day hazardous waste accumulation area located in the central container management area and the wastewater treatment plant (WWTP). The central container management area CAA is used to primarily store containers of hazardous materials produced from practices at Honeywell and the WWTP CAA is used to store super sacks of F019 listed hazardous waste treatment sludge.

Upon entering the central container management area CAA, the inspection team observed twenty-eight 55-gallon containers and one 30-gallon container of hazardous waste (Attachment 3, Photo 6). Seven white 55-gallon drums of industrial shellac hazardous waste were not labeled “Hazardous Waste” but had an accumulation start date of 7/1/2023 (see Attachment 3, Photos 7, 8 and 9). In addition, the inspection team observed eight 55-gallon containers of hazardous waste polypropylene. The containers were labeled “Hazardous Waste”, in good condition and marked with the accumulation start date of 7/11/2023. A “Danger No Smoking” sign, fire extinguishers, and spill kits were observed in the CAA.

There was one 55-gallon container of waste identified as grinder debris and rags labeled as “This Container on Hold Pending Analysis” and dated 7/28/22. There was one 20-gallon container of waste identified as powder talc and labeled as “This Container on Hold Pending Analysis” and dated 7/28/22 (see Attachment 3, Photos 2, 3 and 4). If the analytical results for these materials show they are a hazardous waste then Honeywell would have exceeded the 90-day limit for accumulating hazardous waste. There was one black 55-gallon container labeled “Non-potable Purged Groundwater” from monitoring wells (see Attachment 3, Photos 10 and 11). The container was also labeled “This Container on Hold Pending Analysis”. Next to this container was a 55-gallon container of hazardous waste thinner with an accumulation start date of 5/15/2023 (see Attachment 3, Photos 10, 12, and 13). The container was labeled “Hazardous Waste” and was in good condition. There was also a yellow 55-gallon container labeled “Excess groundwater sampling water” (see Attachment 3, Photo 16). Previous analytical results from purge water collected from remediation activities is included in Attachment 18 showing the material is nonhazardous. Mr. Tony Barrett stated that the groundwater is typically nonhazardous and the waste profile is 75958. Mr. Barrett also stated that the two 55-gallon containers of groundwater have been in the CAA for more than a year.

Inside the WWTP CAA, the inspection team observed a super sack labeled “Hazardous Waste” and with an indication of the nature of the hazard. The super sack was dated “6/9/2023” (Attachment 3, Photos 34 and 35). Fire extinguishers and spill kits were observed at the WWTP CAA. A “Danger No Smoking” sign was not observed at the WWTP CAA. There were two black 55-gallon containers labeled “Purge Water Monitoring Wells” (see Attachment 3, Photos 36 through 38). The containers were also labeled “This Container on Hold Pending Analysis.” The accumulation start dates were 7/6/2023 and 7/10/2023.

During records review, the Honeywell team provided inspection logs for the CAAs. The inspection team reviewed the logs and determined the facility was adequately performing weekly inspections of the CAAs. An example of a CAA log is provided in Attachment 19.

The inspection team reviewed the management of CAAs and observed the following areas of concern:

NOPF 1 – Failure to label containers as “Hazardous Waste”. [Title 128.10 (004.01G)].

Seven white 55-gallon drums of hazardous waste were not labeled “Hazardous Waste” at the central container management area CAA.

NOPF 2 – Failure to accumulate hazardous waste for < 90 days. [Title 128.10 (004.01)].

If the analytical results for the wastes in the three 55-gallon containers and one 20-gallon container accumulated since 2022 (labeled “This Container on Hold Pending Analysis”) show it is hazardous waste, then Honeywell would have exceeded the 90-day limit for accumulating hazardous waste.

NOPF 3 – “No Smoking” signs posted for ignitable wastes. [Title 128.16 (001.01 per 004.01A5)].

A “Danger No Smoking” sign was not observed at the WWTP CAA.

NOPF 4 – Failure to make hazardous waste determinations. [Title 128.4 (002 ref. by 001.05)].

Honeywell had not made hazardous waste determinations for one 55-gallon container of grinder debris and rags, one 20-gallon container of powder talc, and two 55-gallon containers of groundwater monitoring purge water generated since 2022.

4.5 Satellite Accumulation Areas

During the visual inspection, the inspection team observed sixteen SAAs during our walkthrough of the area. Most of the SAA containers were closed, labeled “Hazardous Waste”, and in good condition. Areas of concern during the walkthrough of the SAAs are identified below.

A view of two 55-gallon containers accumulating hazardous waste in SAA 5A and 5B (see Attachment 3, Photo 28). The waste streams are used coolant and die/cast media/brass sludge. NDEE allows two-55-gallon containers of hazardous waste in a single SAA. In the diaphragm production area, excess adhesive from Line 4 of the diaphragm production area is being accumulated in a drip tray which is then disposed of as hazardous waste in SAAs (see Attachment 3, Photos 23 and 24). The polypropylene ethyl alcohol hazardous waste was observed spilling on the floor.

Inside the paint booth at EMB-C, there were three 5-gallon containers accumulating a used paint and spent solvent mixture (see Attachment 3, Photo 17). The containers were unlabeled and open. There was one empty 1-gallon container on the floor. These 5-gallon containers as well as

other 5-gallon containers observed in the paint booth areas are emptied into 55-gallon SAA containers such as the one observed in Photo 26 of Attachment 3.

SAA19 and SAA20 which appear as SAA7 on the facility layout are 55-gallon hazardous waste containers accumulating aerosol cans and solvent contaminated rags generated throughout the facility (see Attachment 3, Photo 32). These SAAs are not or near the point of generation for the hazardous wastes.

The inspection team reviewed the management of the SAAs and observed the following areas of concern:

NOPF 5 – Failure to handle a container in a manner which may cause the container to leak. [Title 128.10 (004.01A3)].

Excess adhesive from Line 4 of the diaphragm production area is being accumulated in a drip tray which is not handled in a manner preventing the excess adhesive hazardous waste from spilling onto the ground.

NOPF 6 – Failure to label SAA containers as “Hazardous Waste” or other words that identifies the contents of the container. [Title 128.10 (005.01B)].

Inside the paint booth at EMB-C, there were three 5-gallon containers accumulating a used paint and spent solvent mixture that were unlabeled.

NOPF 7 – Failure to keep SAA containers closed. [Title 128.10 (004.01A2 as ref 005.01A)].

Inside the paint booth at EMB-C, there were three 5-gallon containers accumulating a used paint and spent solvent mixture that were open.

NOPF 8 – Failure to move hazardous waste from a SAA to a CAA. [Title 128.10 (005.02)]

The 5-gallon SAA containers observed in the paint booth areas are emptied into 55-gallon SAA containers in the area of generation.

NOPF 9 – Failure to accumulate hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste. [Title 128.10 (005.01)].

SAA19 and SAA20 which appear as SAA7 on the facility layout are 55-gallon hazardous waste containers accumulating aerosol cans and solvent contaminated rags generated throughout the facility.

4.6 Former M5 Area

During the visual inspection, the inspection team observed a pit in the former M5 Area where the coolant system was formerly located (see Attachment 3, Photo 29). The area is to be remediated by Clean Harbors so it can be used for other purposes. There was one additional area requiring remediation (see Attachment 3, Photo 31) and one area that was remediated and ready for reuse (see Attachment 3, Photo 30).

The inspection team did not observe any issues or concerns with the management of the former M5 area.

4.7 Parts Washers

Safety-Kleen parts washers using Premium Solvent were observed during the walkthrough. Honeywell staff stated there were eleven 35-gallon parts washers serviced by Safety-Kleen as needed.

The inspection team did not observe any issues or concerns with the management of parts washers on site.

4.8 Universal Waste Accumulation Area

Honeywell manages universal waste in the central container management area (see Attachment 3, Photo 1). The inspection team observed one 8-foot container of universal waste lamps and three 15-gallon containers of sorted universal waste batteries. All containers were labeled either “Universal Waste Lamps” or “Universal Waste Batteries”. The 8-foot container of universal waste lamps was open at the top. The earliest accumulation start observed for the universal waste was “1/7/2023”.

The inspection team reviewed the management of all universal waste storage areas throughout the facility and observed the following area of concern:

NOPF 10 – Failure to keep universal waste lamps in containers or packages that are closed, structurally sound, compatible, and lack evidence of leakage, spillage, or damage that could cause leakage. [Title 128.25 (012.04A)].

The 8-foot container of universal waste lamps was open at the top.

4.9 Used Oil

In the oil room, the inspection team observed a 5-gallon container collecting used oil from hot punctured oil filters (see Attachment 3, Photo 5). The container was not labeled “Used Oil”. Four 55-gallon containers of used oil were observed in the central container management area and the drums were labeled “Used Oil”, closed, and in good condition. One 55-gallon container with a funnel in the bung hole had used oil accumulated on the drum lid (see Attachment 3, Photos 14

and 15). Used oil is generated from repairing compressors and forklifts. The used oil from forklift maintenance conducted by Lift Solutions, Inc. remains on site according to the invoice in Attachment 14. Used oil is transported by Veolia ES Technical Solutions to Veolia ES Technical Solutions in West Carrollton, OH. I reviewed the management of used oil and observed the following area of concern:

NOPF 11 – Failure to label containers of used oil with the words “Used Oil”. [Title 128.07 (009.04A3)]. RESCINDED

One 5-gallon container collecting used oil from hot punctured oil filters was not labeled “Used Oil”.

4.10 Other Regulatory Requirements

Preparedness, Prevention, and Emergency Requirements – Safety and emergency equipment were present and in satisfactory condition in areas throughout the facility. Honeywell updated their RCRA Contingency Plan in May 2023 (see Attachment 19). The maps in the contingency plan do not identify the CAAs and evacuation routes in the event of an emergency. Honeywell last updated appropriate state and local emergency agencies on June 1, 2021 (see Attachment 20).

The inspection team reviewed the preparedness, prevention, and emergency requirements and noted two areas of concern:

NOPF 12 – Failure to submit the plan to the Department, Fire Marshal (for new construction), emergency responders, and hospitals. [Title 128.18 (004.02 ref 004.01H)].

Honeywell last updated appropriate state and local emergency agencies on June 1, 2021.

NOPF 13 – Failure to identify the CAAs and evacuation routes. [Title 128.18 (003.06 ref 004.01H)].

The maps in the contingency plan do not identify the CAAs and evacuation routes in the event of an emergency.

Personnel Training Requirements – Personnel are to be trained to perform hazardous waste duties, and new employees are to be trained within six months of start. The training, at a minimum, must be designed to ensure personnel at Honeywell are able to manage hazardous waste relevant to the positions in which they are employed and respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including:

1. Procedures for using, inspecting, repairing, and replacing facility emergency equipment.
2. Communications and alarm systems
3. Response to fires or explosions

Upon reviewing the hazardous waste training employees of Honeywell receive, the inspection team determined the training to be sufficient. The inspection team reviewed employees who manage hazardous waste and emergency coordinators to ensure all personnel receive an annual hazardous waste refresher training. The inspection team determined all emergency coordinators and employees who require annual refresher training were up to date on their trainings. The most recent training slides provided in Attachment 22 as an example. The inspection team reviewed the personnel training requirements, and no other findings were noted.

Uniform Hazardous Waste Manifests and Land Disposal Restriction Requirements – Honeywell maintained records of manifests on site at the time of inspection. Honeywell generates approximately 20 manifests per year. The inspection team reviewed hazardous waste manifests from 2022 and 2023. Manifests are provided in Attachment 23 as examples.

Honeywell provided a response letter on 8/17/2023 to the areas of concerns identified in the exit briefing and are included in Attachment 24.

5.0 SUMMARY OF FINDINGS

NOPF 1 – Failure to label containers as “Hazardous Waste”. [Title 128.10 (004.01G)].

NOPF 2 – Failure to accumulate hazardous waste for < 90 days. [Title 128.10 (004.01)].

NOPF 3 – “No Smoking” signs posted for ignitable wastes. [Title 128.16 (001.01 per 004.01A5)].

NOPF 4 – Failure to make hazardous waste determinations. [Title 128.4 (002 ref. by 001.05)].

NOPF 5 – Failure to handle a container in a manner which may cause the container to leak. [Title 128.10 (004.01A3)].

NOPF 6 – Failure to label SAA containers as “Hazardous Waste” ” or other words that identifies the contents of the container. [Title 128.10 (005.01B)].

NOPF 7 – Failure to keep SAA containers closed. [Title 128.10 (004.01A2 as ref 005.01A)].

NOPF 8 – Failure to move hazardous waste from a SAA to a CAA. [Title 128.10 (005.02)]

NOPF 9 – Failure to accumulate hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste. [Title 128.10 (005.01)].

NOPF 10 – Failure to keep universal waste lamps in containers or packages that are closed, structurally sound, compatible, and lack evidence of leakage, spillage, or damage that could cause leakage. [Title 128.25 (012.04A)].

NOPF 11 - RESCINDED

NOPF 12 – Failure to submit the plan to the Department, Fire Marshal (for new construction), emergency responders, and hospitals. [Title 128.18 (004.02 ref 004.01H)].

NOPF 13 – Failure to identify the CAAs and evacuation routes. [Title 128.18 (003.06 ref 004.01H)].

Joseph Watson

Digitally signed by Joseph
Watson
Date: 2024.02.16 19:44:32 -05'00'

Joseph Watson

Senior Chemical Engineer

Date: February 16, 2024

Mike Martin - signing for
Amber Whisnant

Digitally signed by Mike Martin -
signing for Amber Whisnant
Date: 2024.02.27 12:15:51 -06'00'

Amber Whisnant

Section Chief

ECAD/CB/RCRA, EPA Region 7

Date: _____

Attachments:

1. Facility Layout (3 pages)
2. Honeywell Inspection Attendees Contact Information (1 page)
3. Elster American Photo Log (38 Photos/39 pages)
4. LQG Inspector Checklist (4 pages)
5. Confidentiality Notice (1 page)
6. Receipt for Documents and Samples (1 page)
7. Process Flow Diagrams (4 pages)
8. Wate Profiles (7 pages)
9. American PittGuard DTR Ready Mixed Comp A SDS (16 pages)
10. American PittGuard DTR Ready Mixed Comp B SDS (14 pages)
11. Acetone SDS (10 pages)
12. American ANSI 49 Gray Polyester SDS (14 pages)
13. Global Electronic Recycling Bill of Lading (1 page)
14. Lift Solutions Invoice (8 pages)
15. Metal Recycling Bill of Lading (2 pages)
16. Midwest Laboratories Analytical Results (2 pages)
17. Sanitary Landfill Documentation (2 pages)
18. Frac Tank Contents Analytical Results (24 pages)
19. Sample CAA Weekly Inspection Forms (2 pages)
20. RCRA Contingency Plan (14 pages)
21. RCRA Contingency Plan Notification Letters (6 pages)
22. RCRA Training Slides (25 pages)
23. Uniform Hazardous Waste Management Forms (19 pages)
24. Facility Response Letter Dated August 18,2023 (26 pages)