

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

VT INDUSTRIES INC.

1000 Industrial Park
Holstein, Iowa 51025
712-368-4381 ext. 10675

EPA ID Number: IAD052752599

On

March 28, 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 VT Industries Inc. (VT) at 1000 Industrial Road in Holstein, 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

VT:

Kevin Huss, Corporate Environmental, Health and Safety Manager
Cole Feltner, Commodity Manager
Keith Horan, Production Engineering Manager
Kyle Recker, General Manager
Carl Simonsen, Safety Manager

Toeroek Team:

Clifford Nelles, Inspector, 816-213-5192

INSPECTION PROCEDURES

Prior to the CEI at VT on March 28, 2023, I conducted a drive-by visual inspection. I did not observe any areas of concern during the drive-by. At approximately 0755 hours, I entered the main office and informed the receptionist that I was there to conduct a hazardous waste CEI. She contacted Mr. Huss by telephone to inform him of my arrival. Messrs. Recker, Horan, and Feltner met me in the reception area. I introduced myself and explained the reason for my arrival. Messrs. Recker, Horan, and Feltner and I adjourned to a conference room where we were joined by Mr. Huss. After introductions, I conducted an entry briefing with Messrs. Recker, Horan, Feltner, and Huss.

During the entry briefing, I presented my business card and EPA credentials to Messrs. Recker, Horan, Feltner, and Huss. 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. Huss would be presented a Confidentiality Notice (Notice) with which he could make or not make a claim of confidentiality for the facility. I also provided Messrs. Recker, Horan, Feltner, and Huss 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.

A copy of each of the following documents was left with Mr. Huss 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
- 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. Huss (Attachment 1). Based on this review, I made no updates to the Verification Report.

I conducted the visual inspection of the facility, accompanied by Messrs. Recker, Horan, and Feltner. Following the visual inspection, I reviewed facility records including waste determination documentation, 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. Recker, Horan, Feltner, Huss, and Simonsen. During the exit briefing, I provided a Receipt for Documents and Samples, which Mr. Huss signed, acknowledging receipt (Attachment 2). I provided Mr. Huss the Notice, which he signed indicating no confidential business information had been provided (Attachment 3). I also provided Mr. Huss 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. The 16 photographs taken during the CEI are included in Attachment 7.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

VT manufactures interior architectural doors. Raw materials used by VT include particle board, gypsum, lead sheeting, wood laminate, adhesives, water-based stains and paints, solvents, and ultraviolet (UV) sealant. The facility currently employs approximately 400 full-time personnel who work one of two shifts (6:00 a.m. to 4:30 p.m. and 5:00 p.m. to 3:30 a.m.) Monday through Friday. The facility consists of a single building with approximately 450,000 square feet under roof on the north side of Holstein, Iowa. VT has been operating at its current location since 1964.

Manufacturing begins with shaping of door cores. Most doors have particle board cores, but some fireproof doors have gypsum cores and x-ray doors have lead sheeting. Wood or plastic laminate is glued to the door cores. Doors to be finished at the facility are sent through one of two roll-coat lines. The lines are identical in operation. Doors are coated with water-based stains and UV sealant top coat. After roll-coating is completed, some doors are taken to the paint room for the door edges to be hand-sprayed with water-based paints and stains.

Cleaning of manufacturing equipment generates waste paint-related material (WPRM) and waste solids. WPRM are liquid wastes consisting of spent solvents with paint, stain, and sealant from equipment cleaning, as well as off-specification or unwanted solvents or paints. Waste solids consist of absorbents and personal protective equipment (PPE) contaminated with roll-coat products or WPRM. The facility considers both wastes to be hazardous based on product and process knowledge. WPRM and waste solids are collected by Brenntag Great Lakes and transported to WRR Environmental Services in Eu Claire, Wisconsin, primarily for fuel blending.

Facility and equipment maintenance activities generate used oil, used oil filters, waste parts washer solvent, excluded solvent contaminated wipes, waste lamps, used batteries, and general

trash. Used oil and used oil filters are managed according to provisions of Title 40 *Code of Federal Regulations* (40 CFR) Part 279 and are collected by Filter Recycling in Cherokee, Iowa, for recycling. Waste parts washer solvent is considered nonhazardous based on product and process knowledge and is collected by Safety-Kleen Services for recycling. Excluded solvent contaminated wipes are managed according to the exclusion in 40 CFR 261.4(a)(26). The wipes are collected by Aramark of Sioux City, Iowa, for laundering and are returned to the facility for reuse. Waste lamps and used batteries are managed as universal wastes according to provisions of 40 CFR Part 273 and are transported to A-TEC Recycling in Des Moines, Iowa, for recycling. General trash is considered nonhazardous and is transported to the Cherokee County Landfill in Cherokee, Iowa, for disposal.

The facility was last inspected on May 1, 2018 by an EPA contractor. The inspector left the following preliminary findings during the CEI:

- Failure to label a universal waste lamps container with the words “universal waste lamps” or “waste lamps” or “used lamps”
- Failure to prepare a quick reference guide for distribution to emergency agencies
- Failure to include a description of actions needed to respond to explosions in the RCRA contingency plan

Preliminary findings for failure to label a universal waste lamps container and failure to prepare a quick reference guide were repeated during this CEI.

2. RCRA Status

VT is identified as a large quantity generator (LQG) of hazardous waste (generating more than 1,000 kilograms [kg] of hazardous waste per month) on the Verification Report provided by EPA (Attachment 1). During the CEI, I reviewed hazardous waste manifests generated over the last three years as well as the facility’s 2021 Biennial Report obtained from the EPA Region 7 Records Center prior to the inspection (Attachment 8). Based on the 2021 Biennial Report (Attachment 8, Pages 4 and 5), the facility generated 31,538 pounds (14,305 kg) of hazardous waste in 2021. Because hazardous waste is generated at a relatively consistent rate throughout the year, I determined the facility generated approximately 2,628 pounds (1,192 kg) of hazardous waste per calendar month in 2001. Manifest records for 2022 and 2023 reflected a similar hazardous waste generation rate. Therefore, I concluded that VT is currently operating as a LQG of hazardous waste. VT is also a small quantity handler (SQH) of universal waste (accumulating less than 5,000 kg of universal waste at any time) and a generator of used oil.

The facility operates one less-than-90-day hazardous waste container accumulation area (HWCAA) in the northeast corner of the facility.

3. Waste Streams

This section of the CEI report describes waste streams generated by the facility, including the facility’s waste determination and waste codes, generation process and rate, management at the facility, and disposition. The following discussion of waste streams is based on conversations with facility representatives, the visual inspection, and my review of waste shipping documents.

Messrs. Recker, Horan, and Feltner accompanied me throughout the CEI. The visual inspection included the production area, and maintenance shop. All inspection participants were provided a copy of U.S. Federal Codes 1001 and 1002, which they read.

WPRM is liquid waste consisting of spent solvents with paint, stain, and sealant generated during cleaning of stain and UV sealant roll-coat equipment, paint guns, and paint lines. WPRM also includes off-specification or otherwise unwanted solvents and coatings. The facility considers WPRM hazardous (D001, D035, F003, F005) based on product and process knowledge. Based on the 2021 Biennial Report, the facility generates approximately 2,628 pounds of hazardous waste per month (Attachment 8, Pages 4 and 5). Per facility representatives, liquid WPRM accounts for approximately 2,328 pounds per month. WPRM is accumulated in a satellite accumulation container (SAC) upon generation and full SACs are transferred to the HWCAA. WPRM is collected by Brenntag Great Lakes and transported to WRR Environmental Services in Eu Claire, Wisconsin, primarily for fuel blending.

Copies of the SDSs for the solvent blend used for manufacturing and cleaning (V-T Industries 7525 Blend), stain (SHER-WOOD VT RC Stain Base), sealants (SHER-WOOD ULTRA-CURE 6421 Sealer PG 15/2 and SHER-WOOD ULTRA-CURE 9420), and adhesive (Rakoll RK-2009) are included as Attachments 9 through 13. WPRM contains each of these constituents. During my review of the SDSs, I noted no constituents or properties that would add other hazardous waste codes to the facility's hazardous waste determination for WPRM.

During the CEI, I observed a SAC of WPRM outside the hazardous waste container accumulation area (HWCAA) (Attachment 7, Photograph 5). The 55-gallon container was near the point of generation, under control of the operator, structurally sound, closed, and held approximately 10 gallons of WPRM. The SAC was labeled with the words "hazardous waste" and an indication of the nature of the hazard. The WPRM SAC was adjacent to a 55-gallon waste solids SAC that held approximately 40 gallons of waste.

Because the total volume of hazardous waste did not exceed 55 gallons, I noted no deficiencies. However, I provided compliance assistance regarding management of SACs and the total accumulation limit of 55 gallons for all hazardous wastes in a satellite accumulation area. The facility stated that they would move the waste solids SAC approximately 15 feet to the west and it would create another satellite area and still be under the control of the operator and at or near the point of generation.

I also observed seven 55-gallon hazardous waste accumulation containers (HWACs) of WPRM in the HWCAA (Attachment 7, Photographs 7 and 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. All of the HWAC labels and dates were visible and could be inspected as they were situated. The earliest accumulation start date was February 6, 2023. I noted no deficiencies with management of WPRM during the CEI.

Waste solids consist of absorbents and personal protective equipment (PPE) contaminated with roll-coat products or WPRM. The facility considers waste solids hazardous (D001, D035, F003, F005) based on product and process knowledge. Per facility representatives, approximately 300

pounds of waste solids are generated per month. Waste solids are accumulated in a SAC upon generation and full SACs are transferred to the HWCAA. Waste solids are collected by Brenntag Great Lakes and transported to WRR Environmental Services in Eu Claire, Wisconsin, primarily for fuel blending.

During the CEI, I observed a SAC of waste solids outside the hazardous waste container accumulation area (HWCAA) (Attachment 7, Photograph 6). The 55-gallon container was near the point of generation, under control of the operator, structurally sound, closed, and held approximately 40 gallons of waste solids. The SAC was labeled with the words “hazardous waste” and an indication of the nature of the hazard. The waste solids SAC was adjacent to a 55-gallon WPRM SAC that held approximately 10 gallons of waste. However, I provided compliance assistance regarding management of SACs and the total accumulation limit of 55 gallons for all hazardous wastes in a satellite accumulation area. The facility stated that they would move the waste solids SAC approximately 15 feet to the west and it would create another satellite area and still be under the control of the operator and at or near the point of generation.

I also observed two 55-gallon HWACs of waste solids in the HWCAA (Attachment 7, Photographs 7 and 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. All of the HWAC labels and dates were visible and could be inspected as they were situated. The earliest accumulation start date was February 7, 2023. I noted no deficiencies with management of waste solids during the CEI.

Used oil is generated from the maintenance of machinery and fork trucks. The facility manages used oil according to provisions of 40 CFR Part 279. The facility generates approximately 55 gallons of used oil per month. The waste is accumulated in various containers and transferred to a 250-gallon used oil storage container in the maintenance shop. Used oil is collected by Filter Recycling in Cherokee, Iowa, for recycling.

During the CEI, I observed the 250-gallon used oil storage container in the maintenance shop (Attachment 7, Photograph 11). The used oil storage container appeared to be structurally sound with no apparent leaks or damage, and was labeled with the words “used oil.” I noted no deficiencies with management of used oil during the CEI.

Used oil filters are generated by the maintenance of machinery and fork trucks. The facility manages used oil filters as used oil under provisions of 40 CFR Part 279. VT generates approximately five to seven used oil filters per month. Used oil filters are drained, accumulated in used oil storage containers, and collected by Filter Recycling in Cherokee, Iowa, for recycling.

During the CEI, I observed four used oil storage containers that held used oil filters (Attachment 7, Photographs 12 and 13). The used oil storage containers appeared to be structurally sound with no apparent leaks or damage, and were labeled with the words “used oil.” I noted no deficiencies with management of used oil filters during the CEI.

Parts washer solvent is generated during the servicing of the parts washer in the maintenance shop. The facility considers used parts washer solvent nonhazardous based on product and

process knowledge. The parts washer uses Safety-Kleen Premium Solvent. A copy of the SDS for Safety-Kleen Premium Solvent is included as Attachment 14. Approximately 30 gallons of used parts washer solvent are generated every 3 months. The parts washer is serviced by Safety-Kleen Systems, and the waste is immediately containerized and transported to Safety-Kleen Systems for recycling.

During the CEI, I observed the parts washer unit in the maintenance shop (Attachment 7, Photograph 10). I did not observe used parts washer solvent in accumulation during the CEI.

Excluded solvent contaminated wipes are generated during the cleaning of roll-out equipment. The facility manages excluded solvent contaminated wipes according to the exemption in 40 CFR 261.4(a)(26). The waste is accumulated in several containers throughout the facility and collected daily for centralized accumulation. VT generates approximately 110 gallons of excluded solvent contaminated wipes per week. The wipes are collected weekly by Aramark of Sioux City, Iowa, for laundering and are returned to the facility for reuse. A copy of a laundering invoice from Aramark, dated March 20, 2023, is included as Attachment 15.

During the CEI, I observed a total of 10 excluded solvent contaminated wipes accumulation containers. Representative photographs of excluded solvent contaminated wipes accumulation containers are in Attachment 7, Photographs 1 through 4 and 9. All containers of excluded solvent contaminated wipes were structurally sound, closed, and had no accumulation of free liquid. However, none of the containers were labeled with the words “excluded solvent contaminated wipes,” as required by 40 CFR 261.4(a)(26)(i) (**NOPF No. 3**).

I asked Mr. Feltner if VT has a written plan to manage any free liquids if discovered. He stated that the written plan requires placement of all contents of the container into a HWAC and transfer of the HWAC to the HWCAA if free liquids are discovered. I provided compliance assistance regarding management of excluded solvent contaminated wipes during the CEI.

Waste lamps are generated by maintenance replacing spent lamps. The facility manages all waste lamps as universal waste according to provisions of 40 CFR Part 273. The facility generates approximately 15 waste lamps per month. Waste lamps are accumulated in universal waste accumulation containers and are collected by A-TEC Recycling in Des Moines, Iowa, for recycling. A copy of a Certificate of Recycling from A-TEC, dated February 7, 2023, is included as Attachment 16.

During the CEI, I observed four universal waste lamps accumulation containers in the maintenance shop (Attachment 7, Photographs 14 through 16). One container held approximately fifteen 4-foot waste lamps, one container held approximately ten 8-foot waste lamps, and the other two containers were empty. Both the 4-foot and 8-foot waste lamps containers were closed. Both containers were labeled with the words “universal waste” but not the complete phrases “universal waste lamps” or “waste lamps” or “used lamps,” as required by 40 CFR 273.14(e) (**NOPF No. 1**). The two universal waste lamps accumulation containers were not dated or otherwise tracked to demonstrate the accumulation time, as required by 40 CFR 273.15(c) (**NOPF No. 2**).

Mr. Simonsen joined the inspection at the maintenance shop. I asked Mr. Simonsen how long the universal waste lamps had been accumulating. He stated that the waste lamps have been accumulating less than two months since all universal waste in accumulation at the facility was transported off site in February 2023.

Used batteries are generated during facility maintenance and include alkali, nickel-cadmium, and lead-acid batteries. The facility considers all used batteries hazardous and manages them as universal waste according to provisions of 40 CFR Part 273. Mr. Simonsen estimated that the facility generates approximately 40 used batteries per month. Used batteries are accumulated in universal waste accumulation containers and are collected by A-TEC Recycling in Des Moines, Iowa, for recycling. A copy of a Certificate of Recycling from A-TEC, dated February 7, 2023, is included as Attachment 16. I did not observe used batteries in accumulation during the CEI.

General trash consists of nonhazardous production wastes, packaging wastes, and general office-type refuse. The facility considers general trash nonhazardous based on product knowledge. The waste is accumulated in various containers throughout the facility. General trash is collected by Holstein Sanitation and transported to the Cherokee County Landfill for disposal. I noted no deficiencies with management of general trash during the CEI.

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

VT maintains one HWCAA in the northeast part of the facility (Attachment 5). During the CEI, I observed nine HWACs and one container of nonhazardous waste in the HWCAA (Attachment 7, Photographs 7 and 8). The white containers held finishing solid waste PPE and the black containers held WPRM. All HWACs were structurally sound, full, 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 February 6, 2023.

According to Mr. Simonsen, the HWCAA is inspected weekly and a log is maintained. I reviewed 3 years of inspection logs and noted no missed inspections. A copy of the inspection log for March 20, 2023, is included as Attachment 17.

I asked Mr. Simonsen how a worker would summon emergency assistance. He stated that all workers who handle hazardous waste are required to carry a company-supplied two-way radio.

6. Manifests and Biennial Report

VT generated manifests for 23 hazardous waste shipments from March 28, 2020, to March 28, 2023. During the CEI, I reviewed all manifests and LDR notifications for the last three years. A copy of the manifest for a shipment dated February 16, 2023, is included as Attachment 18 as an example. I noted no deficiencies during my review of manifests.

The Hazardous Waste Biennial Report for 2021 was submitted on March 16, 2022 (Attachment 8).

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

During the CEI, I reviewed the facility's contingency plan. The contingency plan was last updated on March 16, 2023, and a copy is included in Attachment 19. Mr. Mike Cox (Plant Manager) is listed as the emergency coordinator for the facility, and all pertinent contact information for Mr. Cox is listed in the plan. I reviewed the contingency plan against content requirements of 40 CFR 262.261. The contingency plan included a description of actions to respond to fire, explosions, and releases; description of arrangements with local emergency response agencies; description of emergency equipment including location and capabilities; and evacuation plan. I asked Mr. Huss if VT had prepared a Quick Reference Guide to be given to local response agencies. He stated that VT has not prepared a Quick Reference Guide, as required by 40 CFR 262.17(a)(6) referencing 262.262(b) (**NOF No. 4**). I provided compliance assistance regarding the Quick Reference Guide 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. Huss 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 (including the EC, Mr. Cox). He also stated that annual refresher training is conducted. I asked Mr. Huss who conducts the training. He stated that all training is conducted by Brenntag Great Lakes. Copies of the 2022 training records for Messrs. Huss, Simonsen, and Feltner, are included in Attachment 20 as examples of the training documentation maintained at the facility. The facility is planning to bring in Brenntag Great Lakes for training before the end of 2023.

I reviewed the written job descriptions for Messrs. Huss, Simonsen, and Feltner during the CEI. I did not review job description for Mr. Cox. A copy of the job description for a Finish Line Lead Role (a person who handles hazardous waste) is included as Attachment 21. I noted that the

job descriptions did not include descriptions of skills, education, or qualifications associated with the job titles, as required by 40 CFR 262.17(a)(7)(iv)(B) (**NOPF No. 5**). I also noted that the job descriptions did not include the type and amount of introductory and continuing training, as required by 40 CFR 262.17(a)(7)(iv)(C) (**NOPF No. 6**). I provided compliance assistance regarding written job descriptions 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. VT 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. VT 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 VT 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 universal waste lamps accumulation containers with the words “universal waste lamps” or “waste lamps” or “used lamps,” as required by 40 CFR 273.14(e) (**NOPF No. 1**).
- (2) Failure to demonstrate the length of time of accumulation for two universal waste lamps accumulation containers, as required by 40 CFR 273.15(c) (**NOPF No. 2**).
- (3) Failure to label 10 excluded solvent contaminated wipes containers with the words “excluded solvent contaminated wipes,” as required by 40 CFR 261.4(a)(26)(i) (**NOPF No. 3**).
- (4) Failure to prepare a Quick Reference Guide as required by 40 CFR 262.17(a)(6) referencing 262.262(b) (**NOPF No. 4**).
- (5) Failure to describe in writing, skills, education, or qualifications associated with the job titles as required by 40 CFR 262.17(a)(7)(iv)(B) (**NOPF No. 5**).

- (6) Failure to have a written description of the type and amount of introductory and continuing training as required by 40 CFR 262.17(a)(7)(iv)(C) (**NOPF No. 6**).

NOPFs No. 1 and 4 are repeats from the previous inspection.

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
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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 (1 page)
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 Aerial Photograph of Facility (1 page)
7. Photographic Documentation (Photolog and 16 Photographs) (11 pages)
8. 2021 Biennial Report (5 pages)
9. Copy of SDS for V-T Industries 7525 Blend (9 pages)
10. Copy of SDS for Sher-Wood VT RC Stain Base (10 pages)
11. Copy of SDS for Sher-Wood Ultra-Cure 6421 Sealer PG 15/2 (15 pages)
12. Copy of SDS for Sher-Wood Ultra-Cure 9420 (13 pages)
13. Copy of SDS for Rakoll RK-2009 (7 pages)
14. Copy of SDS for Safety-Kleen Premium Solvent (9 pages)
15. Copy of Invoice dated March 20, 2023 from Aramark (1 page)
16. Copy of Certificate of Recycling from A-TEC Recycling dated February 7, 2023 (1 page)
17. Copy of Inspection Log Dated March 20, 2023 (1 page)
18. Copy of a Manifest Dated February 16, 2023 (1 page)
19. Copy of Contingency Plan (18 pages)
20. Copies of 2022 Training Records for Kevin Huss, Carl Simonsen, and Cole Feltner (3 pages)

21. Copy of Job Description for Finish Line Lead Role (1 page)