



EPA REGION 7 Enforcement Division
INSPECTION REPORT

Inspection Entry Date/Time	03/05/2024 09:00 AM (CT)	Announced: No	
Inspection Exit Date/Time	03/06/2024 02:00 PM (CT)	Access: Granted	
Regulatory Program	RCRA		
Type of Inspection	Compliance Evaluation Inspection (CEI)		
Facility or Site Name	Polynt Composites USA Inc.		
Facility/Site Identifier	MOD086787371		
Facility/Site Physical Address	1412 Knox Street		
City, State, Zip Code	North Kansas City, MO 64116-3706		
County/Borough	Clay County		
Generator Status	LQG		
NAICS	325211		
Type of Operation	Research and development of gel coating.		
Geographic Coordinates	39.176102, -94.570908		
Permit Number (If Applicable)	Not Applicable		
Lead Inspector:			
Mike Martin	[Signature] Martin, Mike	Digitally signed by Martin, Mike Date: 2024.04.19 10:53:35 -05'00'	[Date]
	EPA REGION 7	martin.mike@epa.gov	
Additional EPA Staff Participating in Inspection:			
Name	Title	Organization	Email
Amy Thompson	Inspector	EPA REGION 7	thompson.amy@epa.gov
Koba Butkovich	Inspector	EPA REGION 7	butkovich.koba@epa.gov
Supervisor Review:			
Amber Whisnant	EDWIN BUCKNER	Digitally signed by EDWIN BUCKNER Date: 2024.04.19 11:45:20 -05'00'	[Date]
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SECTION I – INTRODUCTION

Site Entry and Purpose of the Inspection

Type of inspection: CEI

At the request of the Enforcement and Compliance Assurance Division, I conducted a Resource Conservation and Recovery Act (RCRA) CEI at Polynt Composites USA Inc. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. During the CEI, I collected the information and data necessary to

determine compliance with the applicable regulatory and statutory requirements. The inspection report and attachments present the results of the CEI.

Prior to beginning the inspection on the morning of March 5, 2024, I conducted a visual reconnaissance of Polynt searching for areas of concern observable from the adjacent roadway. I identified no environmental issues or concerns during this preliminary examination. Upon arriving unannounced at Polynt at 9:00 a.m., Ms. Thompson, Mr. Butkovich and I met with Mr. Kraynak. He escorted us to a conference room where we met Mses. Drake and Cortelli. I presented them with my EPA credentials and explained the purpose and procedures of the inspection.

The CEI consisted of a discussion of facility operations, waste generation, and waste management; a review of waste management records; and a visual inspection of waste generation and management areas (see attachment 1 for the Site Overview).

Ms. Thompson, Mr. Butkovich and I conducted at visual inspection of the following areas at Polynt:

Building 2 – HW Storage Area #1	Building 53 – Application Center
Building 51 – R&D Labs; Annex Hallway (HW Storage Area #2); Dust Collector Room and Trash Compactor	Old Maintenance Shop
Building 52 – Pilot Plant R&D Lab (HW Storage Area #3)	Old Processing Building – Old QC Lab

Document photocopies and photographs were collected as inspection documentation (Appendix 1). A total of 42 photographs were collected and a photolog was prepared (Appendix 1). I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.1E), unless noted differently. Any authorized Federal regulatory citations noted in this report are adopted by reference in the authorized Missouri regulations.

Attendees

Title/Organization	Name	Opening Conf.	Closing Conf.
RCRA Inspector/EPA	Mike Martin (913) 55-7149 martin.mike@epa.gov	Yes	Yes
RCRA Inspector/EPA	Amy Thompson	Yes	Yes
RCRA Inspector/EPA	Koba Butkovich	Yes	Yes
Loss Control Coordinator/Polynt	Keith Kraynak (816) 391-6059 keith.kraynak@polynt.com	Yes	Yes
Group RD Director/Polynt	Carlotta Cortelli	Yes	Yes
HR Manager Americas/Polynt	Fallon Drake	Yes	Yes
Regional EHS Manager/Polynt	David Maurin	Yes	Yes
Group Leader–Vinyl/Polynt	Sandy Brantner	No	No
R&D Manager/Polynt	John Pajich	No	No
Lab Support/Polynt	Ray Rice	No	No

Technical Assistance/Polynt	Kelley Potterf	No	No
Pilot Lab Chemist/Polynt	Bradley Strathman	No	No
Pilot Lab Chemist/Polynt	Jim Eisenhutt	No	No

Opening Conference

I presented Mr. Kraynak and Ms. Drake and Cortelli with my EPA credentials and explained the purpose and procedures of the inspection. I next presented them with a copy of RCRA Section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented them with a copy of Title 18 U.S. Code, Sections 1001 and 1002. They were made aware of their confidentiality rights and were informed that a Confidentiality Notice would be provided at the end of the inspection to make or not to make any confidentiality claims.

Polynt had been last inspected for RCRA compliance on September 4, 2019, by the MoDNR.

During the September 2019 MoDNR inspection, Polynt was cited for:

1. Failure to ensure containers are in good condition.
2. Failure to store satellite containers at or near any point of waste generation.
3. Failure to attempt to make arrangements with police, fire department and emergency response teams
4. Failure to make arrangements designate a primary emergency authority.
5. Failure to make arrangement with emergency response teams, contractors and equipment suppliers.
6. Failure to make arrangements with local hospitals.
7. Failure to document where state or local authorities decline to enter into such agreements.
8. Failure to submit the contingency plan to local emergency response agencies (*repeat finding*).
9. Contingency plan not up to date.

According to the Hazardous Waste Site Info Verification Report (Attachment 2), Polynt operates as a Large Quantity Generator (LQG) of D001, D002, D018, D035, F003, F005, U223 and U404 hazardous waste. Mr. Kraynak noted no changes to the Hazardous Waste Site Info Verification Report. Polynt generates greater than 2,200 pounds of known HW per month. Therefore, I inspected Polynt as a LQG. In addition, I determined Polynt to be a small quantity handler of universal waste and a used oil generator.

Facility/Site Information

Number of employees	45-50
Length of Facility at Location	1920's
Operating Hours	7am to 4:30pm, Monday-Friday
Size of Facility	4 buildings - 14 acre lot
What type of generator facility verified as?	LQG
Weather Conditions	Days 1 and 2 – Sunny

Process Description

Polynt's gel coat production operation moved to other production sites and ceased in 2020. Polynt's current operation includes research and development of gel coating (resin, styrene, additives, and pigments), a pilot plant and a technical/demonstration application center. Gel coating is produced on site in small batches for research and development purposes.

Waste Description and Generation Process	Waste Type	Generation Rate	If HW, list all codes	Waste Determination Method	Waste Amount Presently in Storage (less than 90-day HW accumulation)	Oldest Accumulation Start Date	Waste Disposal Location
Pilot Plant Resin Waste (generated from production of gel coating for R&D – includes reactor drippings)	HW	165 pounds/month	D001 D035 F003 F005	Process Knowledge	NA	NA	Tradebe (Millington, TN)
Pilot Plant Liquid Waste (generated from production of gel coating for R&D)	HW	482 pounds/month	D001 D002 D035 F003 F005	Process Knowledge	Two 55-gallon less than 90-day HW accumulation containers (HW storage containers)	02/28/2024	Tradebe (Millington, TN)
Pilot Plant Solid Waste (cups, etc. generated from production of gel coating for R&D)	HW	307 pounds/month	D001 D035 F003 F005	Process Knowledge	One 55-gallon HW storage container	02/09/2024	Tradebe (Millington, TN)
R&D Resin Waste (generated from R&D)	HW	814 pounds/month	D001 D035 F003 F005	Process Knowledge	One 55-gallon HW storage container	02/20/2024	Tradebe (Millington, TN)
R&D Composite Solids (generated from R&D)	HW	352 pounds/month	D001 D035 F003 F005	Process Knowledge	One 55-gallon HW storage container	02/20/2024	Tradebe (Millington, TN)
R&D Lab Solids (generated from R&D- styrene)	HW	173 pounds/month	D001 D035 F003 F005	Process Knowledge	One 55-gallon HW storage container	02/20/2024	Tradebe (Millington, TN)
Waste Styrene and Methanol	HW	402 pounds/month	D001	Process Knowledge	NA	NA	Tradebe (Millington, TN)
R&D Solvent (generated from R&D – styrene and methanol)	HW	173 pounds/month	D001	Process Knowledge	NA	NA	Tradebe (Millington, TN)
Application Center Control Debris	HW	50 pounds/month	D001 F003	Process Knowledge	NA	NA	Tradebe (Millington, TN)
Application Center Booth Rinse (waste acetone from cleaning spray booth guns)	HW	183 pounds/month	D001 F003	Process Knowledge	NA	NA	Tradebe (Millington, TN)

Inspection Date(s): 03/05/2024 - 03/06/2024

Lab Pack (generation of old reagents/chemicals)	HW	675 pounds in 2023	D001 D035 F003 F005	Process Knowledge	NA	NA	Tradebe (Millington, TN)
Spent Aerosol Cans (general maintenance, spray paint, etc.)	HW	Varies (one 55-gallon container per year)	D001	Process Knowledge	NA	NA	Tradebe (Millington, TN)
Cloth Wipes (facility wide; reusable wipes contaminated with acetone and sent off-site to be laundered) <i>*Prior to the CEI, the reusable solvent contaminated wipes were collected in 5-10-gallon pails labeled with the words "Recycle Program Rags." The Federal Solvent Wipes Rule was not being followed (labeling as "Excluded Solvent Contaminated Wipes" and written description to ensure the solvent contaminated wipes contain no free liquids)</i>	EX	Varies (collected in 37 five to ten gallon pails throughout the facility)	NA	Process Knowledge	NA	NA	Cintas (Kansas City, MO)
Paint Booth Filters (change out of filters in the Application Center's two paint booths)	NH	Varies	NA	Process Knowledge	NA	NA	Republic (Kansas City, KS)
Baghouse Dust (resin and fiberglass dust)	NH	Varies	NA	Process Knowledge	NA	NA	Republic (Kansas City, KS)
Universal Waste Lamps (re-lamping activities)	UW	Two boxes per year	NA	Process Knowledge	Three cardboard boxes	Less than one year	Safety-Kleen (Norwell, MA)
Universal Waste Batteries (general maintenance)	UW	Two pails per year	NA	Process Knowledge	Three 5-gallon pails	Less than one year	Safety-Kleen (Norwell, MA)

Inspection Date(s):

03/05/2024 - 03/06/2024

Used Oil	UW	Two 55-gallon containers per year	NA	Process Knowledge	NA	NA	Safety-Kleen (Independence, MO)
General Trash	SW	NA	NA	NA	NA	NA	Republic (Kansas City, KS)

HW = Hazardous Waste	AD = Analytical Data	UO = Used Oil
SW = Solid Waste	ND = Not Determined	
EX = Exempt	UW = Universal Waste	

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Bldg. 53 - Application Center	Training/conference area, chemical storage, mixer room, QC lab and two spray booths.	Yes
Bldg. 2 - HW Storage Area #1	HW Storage Area #1. UW-lamps and batteries storage.	Yes
Building 52 - Pilot Plant R&D Lab (HW Storage Area #3)	HW Storage Area #3. Lab and two reactors for small batch gel coat mfg.	Yes
Old Maintenance Shop	Maintenance Shop (spent aerosol cans and lamps).	Yes
Old Processing Bldg - QC Lab	Former gel coat processing building. Gel coat production operations shutdown in 2020.	Yes
Facility Wide	Thirty-two 5 to 10-gallon pails of solvent contaminated wipes.	Yes
Bldg. 51 - R&D Labs; Annex Hallway (HW Storage Area #2); Dust Collector Room, Compactor	HW Storage Area #2. R&D labs (resin waste, composite solids, and lab solids).	No

SECTION II – OBSERVATIONS

Building: Bldg. 53 - Application Center			
Observation #: MM1-OB-004	Date: 03/05/2024	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Kelley Potterf		Title: Technical Assistance	
At the Bldg. 53 - Application Center, I observed one ¼-full 5-gallon pail of unknown blue gel coat (IMG-202403051301301302598124.jpg and IMG-202403051301351352829201.jpg). I asked Ms. Potterf if the container stored waste. Ms. Potterf stated that she did not know. I asked Ms. Bass if she had conducted a hazardous waste determination on the unknown blue gel coat. Ms. Potterf stated “No.” Failure to conduct a hazardous waste determination – 10 CSR 25-5.262(1) incorporating 40 CFR 262.11(a) (NOPF 1a). At the Bldg. 53 - Application Center, I observed one 55-gallon HW satellite accumulation container each of control debris and booth rinse (IMG-2024030512555455542887733.jpg and IMG-202403051312071272312137.jpg). The containers were closed, in good condition, labeled with the words “Hazardous Waste” and marked with the accumulation start date – 01/11/2024 and 03/05/2024 (the HW satellite accumulation containers were being managed under the Missouri Option for satellite accumulation). At the Bldg. 53 - Application Center, I observed one 55-gallon less than 90-day HW accumulation container (HW storage container) of booth rinse (IMG-2024030512502750272103357.jpg). The container was closed, in good condition, labeled with the words “Hazardous Waste” and marked with the 03/05/2024 accumulation start date (the HW storage container was in route to HW Storage Area #1).			
Photo(s)			
IMG-2024030512502750272103357.jpg IMG-2024030512555455542887733.jpg IMG-202403051301301302598124.jpg IMG-202403051301351352829201.jpg IMG-202403051312071272312137.jpg			

Building: Bldg. 2 - HW Storage Area #1			
Observations #: MM1-OB-015 Date: 03/05/2024		Contains AOC: Yes	Contains CBI: No
MM1-OB-023 MM1-OB-012 MM1-OB-014			
Person Interviewed: Keith Kraynak		Title: Loss Control Coordinator	
At Bldg. 2 - HW Storage Area #1, I observed one 55-gallon container storing eight to ten cloth wipes (IMG-202403051409389381636107.jpg and IMG-202403051409459451711242.jpg). I asked Mr. Kraynak if the container stored hazardous waste. Mr. Kraynak stated that he did not know. I asked Mr. Kraynak if he had conducted a hazardous waste determination on the wipes. Mr. Kraynak stated "No." Failure to conduct a hazardous waste determination – 10 CSR 25-5.262(1) incorporating 40 CFR 262.11(a) (NOPF 1d). At Bldg. 2 - HW Storage Area #1, I observed one 55-gallon HW storage container of Pilot Plant Liquid Waste (IMG-2024030513492549252077078.jpg). The container was closed, in good condition, labeled with the words "Hazardous Waste" and marked with the 02/28/2024 accumulation start date. At Bldg. 2 - HW Storage Area #1, I observed three boxes of UW-lamps and three 5-gallon pails of UW-batteries (IMG-202403051406576571634213.jpg). The UW was in closed containers, labeled with the words "Universal Waste-Lamps" or "Universal Waste-Batteries" and marked with the date of accumulation (less than one year).			
Photo(s)			
1. IMG-202403051409389381636107.jpg 2. IMG-202403051409459451711242.jpg 3. IMG-2024030513492549252077078.jpg 4. IMG-202403051406576571634213.jpg			
Building: Pilot Plant R&D Lab			
Observation #: MM1-OB-005 Date: 03/05/2024		Contains AOC: Yes	Contains CBI: No
Persons Interviewed: Bradley Strathman Jim Eisenhutt		Title: Pilot Lab Chemist Pilot Lab Chemist	
At the Pilot Plant Lab, I observed the following HW satellite accumulation containers of reactor drippings (resin waste) not closed: (1) four 5-gallon pails (IMG-2024030511054154176047.jpg, IMG-2024030511054454460441.jpg, IMG-202403051106056543519.jpg, IMG-2024030511061561553856.jpg, IMG-20240305110702721453147.jpg, IMG-202403051107587581324545.jpg, IMG-2024030511113211322068085.jpg, IMG-2024030511122612261947268.jpg, IMG-2024030511123212322006534.jpg, IMG-202403061033333333101419.jpg, and IMG-20240306103341334194304.jpg), (2) four 5-gallon pail liners (IMG-202403051108138131219959.jpg, IMG-202403051108238231221454.jpg, and IMG-202403051108358351300384.jpg), and IMG-202403061033213321108742.jpg) and (3) two 1-gallon pails (IMG-202403051106386381323519.jpg and IMG-20240306103509359113818.jpg). Failure to close HW satellite accumulation containers – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.173(a) (NOPF 2).			

The following HW satellite accumulation containers of reactor drippings (resin waste) were not labeled:

- (1) two of four 5-gallon pails (two pails were labeled with the words “Hazardous Waste”) (same photos as NOPF 2),
- (2) four 5-gallon pail liners (same photos as NOPF 2) and
- (3) two 1-gallon pails (same photos as NOPF 2).

Failure to label HW satellite accumulation containers with the words “Hazardous Waste or with other words identifying the contents” – 10 CSR 25-5.262(2)(C)(3) incorporating 40 CFR 262.34(c)(1)(ii) (NOPF 3).

Both Messrs. Strathman and Eisenhutt stated that the pails located under the reactors sampling ports are used to collect resin waste ([IMG-202403061027462746105459.jpg](#), [IMG-20240306102758275896800.jpg](#) and [IMG-202403061042284228123849.jpg](#)) and are emptied into a 55-gallon container of Pilot Plant Liquid Waste or Pilot Plant Solid Waste. At the Pilot Plant Lab, I observed one 55-gallon HW storage container each of Pilot Plant Liquid Waste and Pilot Plant Solid Waste ([IMG-20240305105113511381395.jpg](#) and [IMG-20240305105114511479001.jpg](#)). The containers were closed, in good condition, labeled with the words “Hazardous Waste” and marked with the accumulation start date (02/28/2024 and 02/09/2024).

At the Pilot Plant Lab, I also observed one 55-gallon container storing a three foot wood board and one clear 5-gallon liner containing a white dust ([IMG-2024030511232623261792662.jpg](#)). I asked Mr. Kraynak if the container stored hazardous waste. Mr. Kraynak stated “No.” I asked Mr. Kraynak if the liner stored hazardous waste. Mr. Kraynak stated “No.” Mr. Kraynak stated that the liner contained a residual additive and it is non-hazardous based on review of the safety data sheet (SDS). I reviewed the additive’s SDS and it appears that the residual additive dust would be non-hazardous.

Photo(s)

1. [IMG-20240305104459445951227.jpg](#)
2. [IMG-20240305105113511381395.jpg](#)
3. [IMG-20240305105114511479001.jpg](#)
4. [IMG-2024030511054154176047.jpg](#)
5. [IMG-2024030511054454460441.jpg](#)
6. [IMG-202403051106056543519.jpg](#)
7. [IMG-2024030511061561553856.jpg](#)
8. [IMG-202403051106386381323519.jpg](#)
9. [IMG-20240305110702721453147.jpg](#)
10. [IMG-202403051107587581324545.jpg](#)
11. [IMG-202403051108138131219959.jpg](#)
12. [IMG-202403051108238231221454.jpg](#)
13. [IMG-202403051108358351300384.jpg](#)
14. [IMG-2024030511113211322068085.jpg](#)
15. [IMG-2024030511122612261947268.jpg](#)
16. [IMG-2024030511123212322006534.jpg](#)
17. [IMG-2024030511232623261792662.jpg](#)
18. [IMG-202403061033213321108742.jpg](#)
19. [IMG-202403061033333333101419.jpg](#)
20. [IMG-20240306103341334194304.jpg](#)

21. [IMG-20240306103509359113818.jpg](#)
22. [IMG-202403061042284228123849.jpg](#)
23. [IMG-202403061027462746105459.jpg](#)
24. [IMG-20240306102758275896800.jpg](#)

Building: Old Maintenance Shop**Observation #:** MM1-OB-011 **Date:** 03/05/2024**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Ray Rice**Title:** Lab Support

At the Old Maintenance Shop, I observed four cardboard boxes of UW-lamps and one 5-gallon plastic tube of UW-lamps ([IMG-20240305133232322501563.jpg](#) and [IMG-2024030513325632562458350.jpg](#)). I asked Mr. Rice if the containers stored spent lamps. Mr. Rice stated "Yes." I asked Mr. Rice if he knew the length of time of accumulation of the spent lamps. Mr. Rice stated "No." I asked Mr. Rice if the spent lamps were hazardous waste. Mr. Rice stated that he did not know. I asked Mr. Rice if he had conducted a hazardous waste determination on the spent lamps. Mr. Rice stated "No." **Failure to conduct a hazardous waste determination – 10 CSR 25-5.262(1) incorporating 40 CFR 262.11(a) (NOPF 1b).**

At the Old Maintenance Shop, I observed one 55-gallon HW satellite accumulation container of spent aerosol cans ([IMG-202403051323022322573674.jpg](#)). The container was closed, in good condition, labeled with the words "Hazardous Waste" and marked with the accumulation start date – 11/07/2023 (the HW satellite accumulation container was being managed under the Missouri Option for satellite accumulation).

Photo(s)

1. [IMG-202403051323022322573674.jpg](#)
2. [IMG-20240305133232322501563.jpg](#)
3. [IMG-2024030513325632562458350.jpg](#)

Building: Old Processing Bldg - QC Lab**Observation #:** MM1-OB-013 **Date:** 03/05/2024
MM1-OB-022**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Keith Kraynak**Title:** Loss Control Coordinator

At the Old Processing Bldg - QC Lab, I observed one 5-gallon pail storing ten cloth wipes ([IMG-20240305140008081985342.jpg](#) and [IMG-202403051400120121824142.jpg](#)). I asked Mr. Kraynak if the pail stored hazardous waste. Mr. Kraynak stated that he did not know. Mr. Kraynak stated that this QC-Lab had been shutdown since 2020 and he was not aware of the length of time of accumulation of the wipes. I asked Mr. Kraynak if he had conducted a hazardous waste determination on the wipes. Mr. Kraynak stated "No." **Failure to conduct a hazardous waste determination – 10 CSR 25-5.262(1) incorporating 40 CFR 262.11(a) (NOPF 1c).**

Photo(s)

1. [IMG-20240305140008081985342.jpg](#)
2. [IMG-202403051400120121824142.jpg](#)

Building: Facility Wide			
Observation #: MM1-OB-027	Date: 03/06/2024	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Keith Kraynak		Title: Loss Control Coordinator	
Prior to the CEI, Polynt had been managing their reusable solvent contaminated wipes in 5-gallon to 10-gallon pails labeled with the words "Recycle Program Rags." These wipes are sent off-site for laundering by Cintas and clean wipes are returned to Polynt. Mr. Kraynak stated that the solvent contaminated wipes are used to clean glassware and equipment. Throughout the visual inspection, I observed pails of solvent contaminated wipes not labeled with the words "Excluded Solvent Contaminated Wipes." At the Pilot Plant R&D Lab and Building 51-R&D Lab 222, I observed one 5-gallon pail each of solvent contaminated wipes labeled with the words "Recycle Program Rags" or "Recycle Program" (IMG-20240305104459445951227.jpg and IMG-2024030514412041201620279.jpg). Mr. Kraynak estimated a total of 37 pails of solvent contaminated wipes on-site (mostly in Building 51). Reusable solvent contaminated wipes are not stored in containers labeled with the words "Excluded Solvent Contaminated Wipes" – 40 CFR 261.4(a)(26)(iv) (NOPF 7). Prior to the completion of the CEI, facility personnel labeled one pail each of reusable solvent contaminated wipes located at the Bldg. 53 - Application Center and Building 51-R&D Lab 222 with the words "Excluded Solvent Contaminated Wipes" (IMG-20240306101254125456967.jpg and (IMG-2024030610501969854.jpg). I asked Mr. Kraynak if Polynt had a written description to ensure the solvent contaminated wipes contain no free liquids. Mr. Kraynak stated "No." No written description to ensure the solvent contaminated wipes contain no free liquids – 40 CFR 261.4(a)(26)(v)(C) (NOPF 8).			
Photo(s) IMG-20240305104459445951227.jpg IMG-2024030514412041201620279.jpg IMG-20240306101254125456967.jpg IMG-2024030610501969854.jpg			
Building: Building 51 - Annex Hallway (HW Storage Area #2)			
Observation #: MM1-OB-009	Date: 03/05/2024	Contains AOC: No	Contains CBI: No
Person Interviewed: Keith Kraynak		Title: Loss Control Coordinator	
At the Building 51 - Annex Hallway (HW Storage Area #2), I observed one 55-gallon HW storage container each of resin waste, composite solids and lab solids (IMG-20240305102942294285244.jpg). The containers were closed, in good condition, labeled with the words "Hazardous Waste" and marked with the 02/20/2024 accumulation start date.			
Photo(s) IMG-20240305102942294285244.jpg			

SECTION III – RECORDS REVIEW

Record: Manifests		AOC: No
Ref #: MM1-RR-002	Reviewed By: Mike Martin	Reviewed Date: 03/06/2024
The past three years uniform hazardous waste manifests were on-file and appeared to be satisfactory.		
Record: Personnel Training		AOC: Yes
Ref #: MM1-RR-004	Reviewed By: Mike Martin	Reviewed Date: 03/06/2024
From the review of HW job descriptions for the Facility Manager and Lab Support Generalist (Attachment 3), I did not observe the description of the type and amount of introductory and continuing training. I asked Mr. Kraynak if Polynt had a written description of the type and amount of introductory and continuing training required for HW staff. Mr. Kraynak stated “No.” No written description of the type and amount of introductory and continuing training for required HW staff - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(3) (NOPF 4).		
Record: Inspections		AOC: No
Ref #: MM1-RR-005	Reviewed By: Mike Martin	Reviewed Date: 03/05/2024
Weekly HW inspections are conducted on HW satellite accumulation and storage containers. The weekly HW inspection logs for past three years were on-file and appeared to be satisfactory.		
Record: Biennial Reports		AOC: No
Ref #: MM1-RR-006	Reviewed By: Mike Martin	Reviewed Date: 03/05/2024
The Biennial report was on-file (Attachment 4) and appeared to be satisfactory.		
Record: Contingency Plan		AOC: Yes
Ref #: MM1-RR-007	Reviewed By: Mike Martin	Reviewed Date: 03/06/2024
Polynt’s contingency plan consist of an Emergency Action Plan-EAP (revised 10/23/2023 to update Emergency Coordinators – Attachment 5), Integrated Contingency Plan-ICP (revised 11/2021 revised 10/23/2023 to update Emergency Coordinators – Attachment 6) and a quick reference guide (Attachment 7). Mr. Kraynak stated that the EAP refers to the ICP. I asked Mr. Kraynak if the contingency plans are up-to-date and were submitted to local emergency agencies. Mr. Kraynak stated that the contingency plans are up-to-date and had not been submitted to local emergency agencies. Contingency Plan not submitted to local emergency agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.53(b) (NOPF 5). From review of the EAP and ICP, the alternative evacuation routes are not listed. Contingency Plan does not list alternative evacuation routes - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(f) (NOPF 6).		

SECTION IV – AREA OF CONCERN

The presentation of Areas(s) of Concern does not constitute a formal compliance determination or violation.

Building: Bldg. 53 - Application Center

[MM1-OB-004](#)

Failure to conduct a hazardous waste determination on one ¼-full 5-gallon pail of unknown blue gel coat - 10 CSR 25-5.262(1) incorporating 40 CFR 262.11(a) **(NOPF 1a)**.

Building: Old Maintenance Shop

[MM1OB011](#)

Failure to conduct a hazardous waste determination on four cardboard boxes of UW-lamps and one 5-gallon plastic tube of UW-lamps - 10 CSR 25-5.262(1) incorporating 40 CFR 262.11(a) **(NOPF 1b)**.

Building: Old Maintenance Shop

[MM1OB013](#)

Failure to conduct a hazardous waste determination on one 5-gallon pail storing ten cloth wipes - 10 CSR 25-5.262(1) incorporating 40 CFR 262.11(a) **(NOPF 1c)**.

Building: Bldg. 2 - HW Storage Area #1

[MM1OB15](#)

Failure to conduct a hazardous waste determination on one 55-gallon container storing eight to ten cloth wipes - 10 CSR 25-5.262(1) incorporating 40 CFR 262.11(a) **(NOPF 1d)**.

Building: Pilot Plant R&D Lab

[MM1OB005](#)

Failure to close ten HW satellite accumulation containers - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.173(a) **(NOPF 2)**.

Building: Pilot Plant R&D Lab

[MM1OB005](#)

Failure to label eight HW satellite accumulation containers with the words "Hazardous Waste or with other words identifying the contents" - 10 CSR 25-5.262(2)(C)(3) incorporating 40 CFR 262.34(c)(1)(ii) **(NOPF 3)**.

Records: Personnel Training

[MM1RR004](#)

No written description of the type and amount of introductory and continuing training required for HW staff - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(3) **(NOPF 4)**.

Records: Contingency Plan

[MM1RR007](#)

Contingency Plan not submitted to local emergency agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.53(b) **(NOPF 5)**.

Contingency Plan does not list alternative evacuation routes - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(f) **(NOPF 6)**.

Building: Facility Wide

[MM1OB027](#)

Reusable solvent contaminated wipes are not stored in containers labeled with the words Excluded Solvent Contaminated Wipes" - 40 CFR 261.4(a)(26)(iv) **(NOPF 7)**.

No written description to ensure the solvent contaminated wipes contain no free liquids - 40 CFR 261.4(a)(26)(v)(C) **(NOPF 8)**.

SECTION V – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

At the conclusion of the CEI, I summarized my findings and recommendations to Messrs. Kraynak and Maurin and Ms. Drake and Cortelli. I provided Mr. Kraynak with a *Confidentiality Notice* (Attachment 8), a *Receipt for Documents and Samples* (Attachment 9), and a *Notice of Preliminary Findings* (NOPF) (Attachment 10), which he signed as acknowledgement of receipt. No confidentiality claims were made by Polynt.

The following inspection documents and compliance assistance handouts were left with Polynt:

Notice Regarding Proprietary/Confidential Business Information (EPA Handout)
Confidentiality Notice (Top page of the completed carbonless transfer set)
Receipt for Documents and Samples (Top page of the completed carbonless transfer set)
NOPF (Top page of the completed carbonless transfer set)
Instructions for Responding to an NOPF (EPA Handout)
Solvent Contaminated Wipes Final Rules Summary Chart (EPA Handout)
Hazardous Waste Satellite Accumulation (MoDNR Technical Guidance Document)

Follow Up

I observed no follow up at the time of the CEI.

Communication Log

No additional information received by REGION 7 after exiting the Facility on 03/06/2024.

SECTION VI – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted.

SECTION VII – LIST OF APPENDICES

1. Photo Log
2. Report Attachments