

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

ROSENBOOM MACHINE AND TOOL

1 Lary Rosenboom Drive
Spirit Lake, Iowa 51360
712-336-0706 ext. 2169

EPA ID Number: IAR000500405

On

August 15, 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 Rosenboom Machine and Tool (Rosenboom) at 1 Lary Rosenboom Drive, Spirit Lake, 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

Rosenboom:

Kevin West, EHS Coordinator

Justin Zevenbergen, Lead Painter

Toeroek Team:

Clifford Nelles, Inspector, 816-213-5192

Steve Johnson, Trainee

INSPECTION PROCEDURES

Prior to the CEI at Rosenboom on August 15, 2023, I conducted a drive-by visual inspection. I did not observe any areas of concern during the drive-by. At approximately 7:45 a.m., I entered the lobby of the facility and informed the receptionist of my intent to conduct a CEI. I asked to speak with Mr. Kevin West, who was listed as the RCRA site contact on the Notification Acknowledgement/Verification Report (Verification Report) provided by EPA prior to the inspection (Attachment 1). The receptionist contacted Mr. West, who was at the facility's Sheldon, Iowa, location approximately 45 minutes to one hour away. Mr. Johnson and I decided to wait for Mr. West to arrive prior to beginning the CEI, and were shown to a conference room. Mr. West arrived at the facility approximately one hour later. After brief introductions, I explained the purpose and scope of the CEI to Mr. West. Mr. West stated that the Sheldon, Iowa, facility went through a RCRA CEI the previous week (August 8, 2023). Mr. West and I adjourned to a conference room where I proceeded to conduct an entry briefing with him.

During the entry briefing, I presented my business card and EPA credentials to Mr. West. 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. West 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. West 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. West 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 Verification Report with Mr. West (Attachment 1). Based on this review, I made no changes to the Verification Report.

I conducted a visual inspection of the facility, accompanied by Mr. West. Following the visual inspection, I reviewed facility records including hazardous waste manifests with land disposal restriction (LDR) notifications, safety data sheets (SDS), contingency plan, inspection records, and training documentation. I prepared and completed a site-specific inspection checklist to document my observations.

At the conclusion of the CEI, I conducted an exit briefing with Mr. West. During the exit briefing, I provided a Receipt for Documents and Samples, which Mr. West signed, acknowledging receipt (Attachment 2). I provided Mr. West the Notice, which he signed indicating no confidential business information had been provided (Attachment 3). I also provided Mr. West 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. All 16 photographs taken during the CEI are included in Attachment 7.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

Rosenboom manufactures custom hydraulic cylinders. Raw materials used by Rosenboom include metal (steel, aluminum, and brass), solvents, and paints. The facility does not conduct any plating. Metal bar stock, tubes, and other parts arrive at the facility, including stainless steel, cold-rolled steel, brass, and aluminum. Parts are fabricated, cut, and otherwise shaped on site. The parts are cut in oil, generating used oil. The facility feeds the oil into one of two systems. Oil that can be reused is filtered and returned to fabrication. When oil can no longer be used, it is collected in an aboveground storage tank (AST) for recycling. Waste paint related material (WPRM) is generated by cleaning paint guns and paint lines with solvent. All WPRM is reclaimed through a distillation unit in the paint kitchen. Reclamation of WPRM generates still bottoms.

Facility and equipment maintenance activities generate used oil, paint booth filters, waste lamps, and general trash. Used oil is managed as used oil according to provisions of Title 40 *Code of Federal Regulations* (40 CFR) Part 279. Used oil and oily wastewater are processed in an onsite oil/water separation system. The facility also has a wastewater treatment plant (WWTP). Treated wastewater is discharged to the sanitary sewer, which discharges to the Iowa Great Lakes Sanitary District publicly owned treatment works (POTW) under a pretreatment agreement. A copy of the cover letter for the National Pollutant Discharge Elimination System (NPDES) permit for Iowa Great Lakes Sanitary District is included as Attachment 8.

Paint booth filters are considered nonhazardous based on analytical testing and are added to general trash for landfill disposal. Waste lamps and waste batteries are managed as universal wastes according to provisions of 40 CFR Part 273. Universal wastes are collected for offsite recycling. General trash is considered nonhazardous and is collected for landfill disposal at the Dickinson County landfill.

Rosenboom is located in a rural area north of Spirit Lake, Iowa. The facility began operations at this location in 1978. Rosenboom currently employs approximately 362 full-time personnel, who work one of two shifts—6:00 a.m. to 4:30 p.m. and 4:30 p.m. to 2:30 a.m., Monday through Friday. The facility consists of a single manufacturing building with approximately 265,000 square feet under roof. Rosenboom's primary North American Industrial Classification System (NAICS) code is 333995 (Fluid Power Cylinder and Actuator Manufacturing).

No prior RCRA CEIs have been conducted by EPA or an EPA contractor at this location.

2. RCRA Status

The Verification Report (Attachment 1) indicates that Rosenboom is registered with EPA, under EPA ID IAR000500405, as a large quantity generator (LQG) of hazardous waste (generating more than 1,000 kilograms [kg] or 2,200 pounds of hazardous waste per month). I confirmed the facility's generator status through review of the facility's 2021 hazardous waste biennial report, current operations, interviews, and review of waste disposal records.

The facility generates and reclaims WPRM through use of an onsite distillation unit. Based on available records, I could not determine the quantity of WPRM to count toward the facility's monthly hazardous waste generation rate. However, based on the 2021 Biennial Report summary provided by EPA prior to the inspection (Attachment 9), Rosenboom generates approximately 3,700 pounds (1,682 kg) of distillation bottoms per month. Therefore, based on the quantity of distillation bottoms alone, I determined Rosenboom is operating as a LQG of hazardous waste and inspected the facility as such.

Universal wastes are shipped off site for recycling approximately once a year. Based on the quantities of universal waste lamps and batteries accumulated on site between shipments, I determined Rosenboom is operating below the small quantity handler (SQH) accumulation threshold of 5,000 kilograms (11,000 pounds) of universal waste on site at any time. Therefore, I inspected Rosenboom as a SQH of universal waste. I also inspected Rosenboom as a used oil generator.

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. West accompanied me during the visual inspection. Mr. Zevenbergen participated during the visual inspection of the paint booths.

Distillation bottoms (still bottoms) are generated from distillation of WPRM (spent solvent and paint generated from flushing paint lines and cleaning of spray gun nozzles). The distillation unit is operated approximately once each production day, with an initial fill of 55 gallons and a recovery rate of 50-60%. Still bottoms are accumulated in 55-gallon hazardous waste accumulation containers (HWACs) in the paint kitchen hazardous waste container accumulation area (HWCAA). The facility has determined that still bottoms are hazardous waste (D001, D035, F003, and F005) based on product and process knowledge. Copies of the SDSs for components of the still bottoms (Spectracron SPU CE Gray, Spectracron SPU F9A Green, MEK/Acetone 50-50, and Nexeo Recycled Solvent Blend) are included in Attachments 10 through 13. Based on the SDSs, it appears the facility's waste determination is adequate. Based on the 2021 Biennial Report summary (Attachment 9), the facility generates approximately 3,700 pounds of still bottoms per month. The waste is collected by Univar Solutions and transported to Univar Solutions in Shakopee, Minnesota, for bulking and offsite transfer. I observed no still bottoms in accumulation during the CEI. The facility shipped all accumulated still bottoms on August 14, 2023, the day prior to the CEI.

Paint booth filters are generated from the replacement of spent paint booth filters. The facility considers spent paint booth filters to be nonhazardous waste based on analytical testing. A copy of an analytical report for paint booth filter analysis, dated January 15, 2021, is included as Attachment 14. I asked Mr. West if the paint guns are ever sprayed on the paint booth filters during cleaning or flushing. He stated that the paint guns are not sprayed on the filters and that filters are dry when replaced. Based on the analytical testing results and Mr. West's statements, it appears the facility's waste determination is adequate. Paint booth filters are replaced twice each week, generating approximately 3,000 pounds of paint booth filters per week. The paint booth filters are added to the facility's general trash and transported by Waste Management to the Dickinson County Landfill for disposal. I did not observe spent paint booth filters in accumulation during the CEI.

WPRM is generated during the paint changes in the paint booths by cleaning paint guns and flushing paint lines with solvent. The facility considers WPRM to be hazardous waste (D001, D035, F003, and F005) based on product and process knowledge. Copies of the SDSs for the components of WPRM are included in Attachments 10-13. Based on the SDSs, it appears the facility's waste determination is adequate. WPRM is accumulated in satellite accumulation containers (SAC) in the paint booths. SACs are emptied into a 55-gallon HWAC in the paint kitchen HWCAA at the end of each shift for reclamation. I was not able to determine a WPRM generation rate during the CEI.

During the CEI, I observed two 5-gallon SACs of WPRM at the topcoat paint booth (Attachment 7, Photographs 10 through 12). The SACs were structurally sound, under control of the operator, at the point of generation, closed, and labeled with the words "hazardous waste" and an indication of the nature of the hazard. One SAC held approximately two gallons of WPRM and the other held approximately three gallons of WPRM.

I observed two 5-gallon SACs of WPRM at the clearcoat paint booth (Attachment 7, Photograph 13). The SACs were structurally sound, under control of the operator, at the point of generation, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and held approximately two to three gallons of WPRM.

I also observed a gun cleaning station at the clearcoat paint booth (Attachment 7, Photograph 14). Disconnected paint guns are soaked in solvent and brushed in covered containers, wiped dry, and then reconnected to paint lines.

During the CEI, I observed one 5-gallon SAC of WPRM in the prime booth (Attachment 7, Photograph 16). The SAC was structurally sound, under control of the operator, at the point of generation, and held approximately two gallons of WPRM. However, the SAC was not labeled with the words “hazardous waste,” as required by 40 CFR 262.15(a)(5)(i) (**NOPF No. 3**). The SAC was not labeled with an indication of the nature of the hazard, as required by 40 CFR 262.15(a)(5)(ii) (**NOPF No. 4**). The SAC was not closed, as required by 40 CFR 262.15(a)(4) (**NOPF No. 5**). During the CEI, I provided compliance assistance regarding management of SACs.

Excluded solvent contaminated wipes (ESCW) are generated by wiping down and drying of paint guns after cleaning. ESCW are accumulated in five gallon containers at paint gun cleaning stations. The facility considers ESCW to be excluded from the definition of hazardous waste according to the exclusion in 40 CFR 261.4(b)(18). The facility generates approximately 55 gallons of ESCW every three months. ESCW are transported by Univar Solutions to Univar Solutions in Shakopee, Minnesota. for incineration.

During the CEI, I observed one 5-gallon ESCW accumulation container at the clearcoat booth gun cleaning station (Attachment 7, Photograph 15). The container was closed and held approximately two gallons of ESCW with no free liquids. However, the ESCW container was labeled with the words “excluded solvent wipes” and not “excluded solvent contaminated wipes,” as required by 40 CFR 261.4(b)(18)(i) (**NOPF No. 6**). NOPF #6 was not initially left with the facility during the CEI, but was added on August 30, 2023. Mr. West was notified of its addition by email on August 30, 2023.

Used oil is generated during the maintenance of facility equipment, as well as processing (treatment) of oily wastewater generated on site. The facility manages used oil according to provisions of 40 CFR Part 279. According to Mr. West, Rosenboom processes all used oil and oily wastewater through an onsite oil/water separator to remove used oil from the combined waste stream. Rosenboom generates approximately 84 gallons of used oil per month. Used oil is accumulated in a 3,000-gallon aboveground storage tank, and is collected by Green for Life in Mokena, Illinois for recycling.

During the CEI, I observed the oil/water separator (Attachment 7, Photograph 8). I also observed the 3,000-gallon used oil storage tank (Attachment 7, Photograph 9). The used oil storage tank appeared to be structurally sound with no evidence of leaks, 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 during maintenance of machinery and the filtering of cutting oil prior to reuse. The facility manages used oil filters as used oil according to provisions of 40 CFR Part 279. Rosenboom generates approximately two used oil filters per year according to Mr. West. The used oil filters are accumulated in a 55-gallon used oil storage container and are collected by Univar for recycling. I did not observe used oil filters in accumulation during the CEI.

Waste lamps are generated by maintenance personnel replacing spent lamps. The facility manages waste 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. The waste is collected by A-TEC Recycling and transported to A-TEC Recycling in Des Moines, Iowa, for recycling.

During the CEI, I observed three containers of universal waste lamps in the maintenance shop:

- One container held four universal waste lamps (Attachment 7, Photographs 1 and 3). The container was structurally sound, closed, and labeled with the words “universal waste lamps.” The container was marked with partial accumulation start date of February 2022 (month and year only) with no day. Because the accumulation start date was not a complete date, I determined the facility failed to date or otherwise track the universal waste accumulation time with a complete date on a universal waste lamps container, as required by 40 CFR 273.15(c) (**NOPF No. 1**). Based on the month and year marked, the facility accumulated universal waste for longer than one year, prohibited by 40 CFR 273.15(a) (**NOPF No. 2**)
- One container held approximately 20 universal waste lamps (high intensity discharge lamps) (Attachment 7, Photographs 4, 6, and 7). The container was structurally sound, closed, labeled with the words “universal waste” and “used lamps,” and dated October 1, 2022.
- One container held approximately 102 universal waste lamps (100 green-tipped lamps and two non-green tipped lamps) (Attachment 7, Photograph 5). The container was structurally sound, closed, labeled with the words “universal waste lamps,” and dated October 1, 2022.

During the CEI, I provided compliance assistance regarding management of universal waste lamps.

Waste batteries are generated by maintenance replacing spent batteries. The facility manages waste batteries as universal waste according to provisions of 40 CFR Part 273. Universal waste batteries are accumulated in universal waste accumulation containers in the maintenance shop. The universal waste batteries are collected by A-TEC Recycling and transported to A-TEC Recycling in Des Moines, Iowa, for recycling. During the CEI, I observed three 5-gallon containers of universal waste batteries in the maintenance shop (Attachment 7, Photograph 4). All three of the containers were labeled “universal waste batteries” and were empty.

Mapp gas cylinders are generated by maintenance personnel repairing equipment. The facility considers waste Mapp gas cylinders to be hazardous waste (D001) based on product and process knowledge. I did not determine a generation rate for this waste during the CEI; however, the waste is accumulated in a 55-gallon SAC and has not yet been shipped off site for treatment or disposal. During the CEI, I observed a SAC of empty Mapp cylinders in the maintenance shop (Attachment 7, Photograph 2). The SAC was structurally sound, under control of the operator, at the point of generation, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and held approximately 10 empty gas cylinders.

General trash is generated during facility maintenance and manufacturing. The facility has determined that general trash is nonhazardous waste based on product and process knowledge. General trash includes, but is not limited to, paint booth filters, floor sweepings, paper, and cardboard packaging. General trash is collected by Waste Management and transported to the Dickinson County landfill. 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

Rosenboom maintains one HWCAA at the paint kitchen. Due to safety concerns, I was unable to photograph the HWCAA or the distillation unit. At the time of the CEI, the HWCAA was empty as all of the HWACs were collected on August 14, 2023 (the day prior to the CEI). I asked Mr. West if the HWCAA is inspected. He stated that the HWCAA is inspected weekly by Mr. Zevenbergen. I asked Mr. Zevenbergen if he maintains an inspection log. He stated that he did not maintain an inspection log to document his weekly inspections. He also stated that he has not missed any inspections. I asked Mr. West how someone would summon emergency assistance in the HWCAA. He stated that all of the workers that handle hazardous waste carry two-way radios or company-supplied cellular phones.

6. Manifests and Biennial Report

Rosenboom generated 100 uniform hazardous waste manifests from August 15, 2020, to August 15, 2023. During the CEI, I reviewed uniform hazardous waste manifests and LDR notifications for five shipments in 2020, five in 2021, five in 2022, and five in 2023. Copies of the uniform hazardous waste manifests for shipments dated July 10, 2023, August 7, 2023, and August 14, 2023 are included in Attachment 15. The facility submitted its 2021 Biennial Report on February 16, 2022 (Attachment 8). I noted no deficiencies during my review of uniform hazardous waste 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. West, Rosenboom is the subject of a regular inspection by the Spirit Lake 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.

The facility's Contingency Plan was last updated December 31, 2018. The Contingency Plan included a description of actions needed to respond to fires, explosions, and spills, a description of arrangements with the local emergency agencies, a list of emergency response equipment (including capabilities and location), and a complete evacuation plan with a description of the signals used, as required by 40 CFR 262.17(a)(6) referencing 262.261(a, c, e, and f). The Contingency Plan included telephone numbers of the primary emergency coordinator, Mr. Dan Block, and Mr. Ryan Laubenthal, the alternate emergency coordinators, as required by 40 CFR 262.17(a)(6) referencing 262.261(d). It also included a Quick Reference Guide, as required by 40 CFR 262.17(a)(6) referencing 262.262(b). Copies of the Contingency Plan and Quick Reference Guide are included as Attachments 16 and 17. I noted no deficiencies with the facility's emergency preparedness, prevention, and procedures during the CEI, including content of the Contingency Plan.

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. West 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 months of hiring or being assigned to a job that handles hazardous waste. He also stated that annual refresher training is conducted. I asked Mr. West who conducts the training. He stated that all training is conducted by National Environmental Trainers or Univar Solutions. I reviewed the training records for the last three years for Messrs. Zevenbergen, West, and Block. Copies of training records for Messrs. Zevenbergen, West, and Block are included in Attachment 18. I reviewed the written job descriptions for Mr. Zevenbergen and noted that it appeared to meet requirements of 40 CFR 262.17(a)(7)(iv). A copy of the Job Description for a painter is included as Attachment 19.

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. Rosenboom is not subject to the Subpart AA regulations because the facility does not have any of the process vents listed above. The 55-gallon distillation unit used to reclaim WPRM at the facility is an exempt recycling unit.

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. Rosenboom 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 Rosenboom 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:

- Failure to accurately track accumulation time with a complete date on a universal waste lamps container, as required by 40 CFR 273.15(c) (**NOPF No. 1**)
- Accumulation of universal waste beyond one year, prohibited by 40 CFR 273.15(a) (**NOPF No. 2**)
- Failure to label a satellite accumulation container with the words hazardous waste, as required by 40 CFR 262.15(a)(5)(i) (**NOPF No. 3**)
- Failure to label a satellite accumulation container with an indication of the nature of the hazard, as required by 40 CFR 262.15(a)(5)(ii) (**NOPF No. 4**)
- Failure to keep a satellite accumulation container closed, as required by 40 CFR 262.15(a)(4) (**NOPF No. 5**)
- Failure to label an Excluded Solvent Contaminated Wipes container with the words “Excluded Solvent Contaminated Wipes,” as required by 40 CFR 261.4(b)(18)(i) (**NOPF No. 6**)

NOPF #6 was not left with the facility but was added on August 30, 2023. Mr. West was notified by email on August 30, 2023.

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: 2023.10.04
11:42:19 -05'00'

Date: _____

Clifford A. Nelles, Inspector
CLAENE Group

Whisnant,
Amber

Digitally signed by
Whisnant, Amber
Date: 2023.10.13
15:41:37 -05'00'

Date: _____

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

Attachments:

1. Notification Acknowledgement/Verification Report (2 pages)
2. Receipt for Documents and Samples (1 page)
3. Confidentiality Notice (1 page)
4. Notice of Preliminary Findings (1 page)
5. Site Map (1 page)
6. Google Earth Aerial Photograph (1 page)
7. Photographic Documentation (Photolog and 16 Photographs) (11 pages)
8. Copy of NPDES Permit Cover (1 page)
9. Copy of 2021 Biennial Report (4 pages)
10. Copy of SDS for Spectracron SPU CE Gray (15 pages)
11. Copy of SDS for Spectracron SPU F9A Green (14 pages)
12. Copy of SDS for MEK/Acetone 50-50 (12 pages)
13. Copy of SDS for Nexeo Recycled Solvent Blend (8 pages)
14. Copy of Analytical Report for Paint Booth Filters (5 pages)
15. Copies of Manifests Dated July 10, 2023, August 7, 2023, and August 14, 2023 (6 pages)
16. Copy of Contingency Plan (6 pages)
17. Copy of Quick Reference Guide (3 pages)
18. Copies of Training Records (6 pages)
19. Copy of Job Description for Painter (4 pages)