

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At
Axalta Coating Systems USA LLC – Fort Madison Plant
803 35th Street
Fort Madison, Iowa 52627
(319) 376-5312

EPA ID Number: IAR000518142

On

June 14, 2022

By

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 7
Enforcement and Compliance Assurance Division (ECAD)

1.0 INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division, I conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Axalta Coating Systems USA LLC (Axalta), located in Fort Madison, Iowa, on June 14, 2022. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. The facility was previously inspected for RCRA compliance February 26-28, 2019, the results of which are summarized below in Section 5.0, Summary. During this inspection, 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.

2.0 PARTICIPANTS

Axalta:

Ashlee Gutierrez, Environmental Specialist, approximately 10 years in current position.

U.S. Environmental Protection Agency (EPA):

H. D. “Doug” Bryant, CPP, PCI, Civil Investigator, SEE, ECAD/Chemical Branch/RCRA Section.

3.0 INSPECTION PROCEDURES

Prior to beginning the inspection, I conducted a visual reconnaissance of Axalta on June 14, 2022, searching for areas of concern observable from the adjacent roadway. No environmental issues or areas of concern were observed during this preliminary examination.

I arrived unannounced at Axalta at approximately 08:45 hours, June 14, 2022. I parked outside the

facility in a posted visitor parking space. I approached an access control building that was staffed by contract security personnel. I asked to meet with Mrs. Ashlee Gutierrez, identified as the client contact. The security officer instructed me to sign a visitor roster and enter my contact information into a tablet that was linked to a visitor access control system. The security officer telephoned and summoned Mrs. Gutierrez from inside the plant. Mrs. Gutierrez arrived at the security access building shortly thereafter. I presented my EPA Credentials and Mrs. Gutierrez directed me into the plant area and to her office, used throughout this inspection.

I started my entrance briefing in Mrs. Gutierrez's office. I presented my EPA credentials to Mrs. Gutierrez again. Mrs. Gutierrez and I exchanged business cards (Attachment 1). I next presented Mrs. Gutierrez a copy of RCRA section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented her a copy of Title 18 U.S. Code, Sections 1001 and 1002. She was made aware of her confidentiality rights and was informed that a Confidentiality Notice would be provided at the end of the inspection to make or not to make any claims. Mrs. Gutierrez acted as the official Axalta facility representative throughout this inspection.

The inspection consisted of an entry briefing, 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. Mrs. Gutierrez provided a site map/diagram of the facility (Attachment 2). Diagrams showing HW generation and storage areas were annotated during the visual inspection of the facility (Attachments 3 and 4).

Document photocopies and 26 photographs were collected as inspection documentation (Attachments 1-28). Information collected during the CEI was recorded on a checklist and in field notes. I followed the inspection procedures discussed in the RCRA Compliance Evaluation Inspection Standard Operating Procedure (No. 2321.1C), unless noted differently.

At the conclusion of the inspection, I conducted an exit briefing, during which I summarized my findings and recommendations with Mrs. Gutierrez. I provided Mrs. Gutierrez a *Confidentiality Notice*, which she signed, indicating no confidentiality claims were made by the facility (Attachment 5). I provided Mrs. Gutierrez a *Receipt of Documents and Samples* which she signed acknowledging receipt (Attachments 6). I provided Mrs. Gutierrez a *Notice of Preliminary Findings* which she signed acknowledging receipt (Attachment 7).

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

Section 3007 Inspections Sheet (EPA Handout)

RCRA Facility Access Information Sheet (EPA Handout)

United States Code Annotated (EPA Handout)

Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections (EPA Handout)

Notice of Preliminary Findings (EPA Handout)

Instructions for Responding to a Notice of Preliminary Findings (NOPF) (Reverse of NOPF)

U.S. EPA Small Business Resource Information Sheet (EPA Handout)

Solvent-Contaminated Wipes Final Rule Chart (EPA Handout)

Excluded Solvent-Contaminated Wipe Rule (IDNR Handout)

Battery Recycling/Disposal (IDNR Handout)
Universal Wastes Including Aerosol Cans (IDNR Handout)
Environmental Compliance Assistance Centers (EPA Handout)
e-Manifest Fact Sheet (EPA Handout)
RCRA Online A Quick Reference Guide (EPA Handout)
Emergency Response Program (EPA Handout)
Security Awareness (EPA Handout)
Managing Your Hazardous Waste: A Guide for Small Business (EPA Handout)

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

Axalta is located in the southeastern area of Fort Madison, Iowa, and is zoned for commercial use. Residential housing is immediately to the east of the facility including an elementary school. The area immediately south includes commercial use and residential use. Fort Madison Community school is located northwest of the facility and several residences are located west of the facility. The area north of the facility is largely undeveloped. The site is approximately 110 acres in size, has multiple buildings, tank farms and ancillary facilities. The facility is paved to facilitate facility operations and vehicle movement. The site is shared with E. I. DuPont (DuPont). DuPont formerly operated the entire facility most recently as DuPont Performance Coatings. The DuPont facility was established in 1937 for the manufacture of resins, inks and specialty products related to coatings.

On February 1, 2013, DuPont sold the DuPont Performance Coatings business to the Carlyle Group to form a stand-alone company which was later named Axalta. Axalta continues the resins manufacturing business at the Fort Madison facility. DuPont continues the ink and specialty products business at the Fort Madison facility. The facility map is color-coded showing the Axalta and DuPont operational areas of the facility (Attachment 2). The colors of the buildings on the map represent:

- Blue – building and equipment owned/operated by Dupont
- Olive – building and equipment owned/operated by Axalta
- Green – building owned by DuPont; equipment owned and operated by Axalta
- Yellow – owned by DuPont; operated by Axalta
- Tan – common areas shared by both Axalta and DuPont

I asked Mrs. Gutierrez if Axalta's and DuPont's operations are interconnected in any way, e.g., shared personnel, equipment, waste treatment or waste accumulation areas. She stated that the two businesses maintain a clear separation with separate personnel, equipment, production areas, and waste management areas. In most cases, Axalta and DuPont operations are physically separated, i.e., separate buildings. Where buildings are shared, e.g., the warehouse/raw materials storage buildings, Axalta and DuPont have defined areas of use. Based on this information, as well as my observations during the visual inspection, it appeared that Axalta and DuPont are operating as two distinct businesses.

Axalta manufactures water and solvent-based polymer products, coatings, and latex materials through batch mixing, formulation, and reacting. These products are primarily used as intermediates at other Axalta manufacturing facilities. Some of the chemicals used in the production process are Xylene,

Toluene, Novaphren SC 40, Tetrahydrofuran, and Methyl Ethyl Ketone (MEK). Axalta operated an onsite industrial wastewater pretreatment facility until July 2021. Axalta also operates a closed-loop thin film evaporator (TFE) system for solvent reclamation. Axalta employs approximately 54 personnel, working various shifts on a continuous seven-days-per-week schedule. Axalta operates two less than 90-day hazardous waste accumulation tanks in Building 58 and a less than 90-day container storage accumulation area in Building 20 (Attachments 2, 3 and 4). An open-air concrete pad is used for less than 90-day accumulation of hazardous waste transferred to tank trailers from the two hazardous waste accumulation tanks. Two 300-gallon portable tanks are used for less than 90-day accumulation of hazardous waste in the manufacturing areas in Building 3 (Attachment 4). Various satellite accumulation containers are utilized throughout the Axalta facility with most occurring in the manufacturing areas in Building 3 (Attachment 4). The North American Industry Classification System (NAICS) code for this facility is 325211 – Plastics Material and Resin Manufacturing.

4.2 RCRA Status

The facility has notified the EPA that it is a large quantity generator (LQG) of HW. The facility certified LQG status by notification on January 4, 2018. The facility notified the EPA that it would begin managing hazardous secondary material (HSM) (D001, F003, and F005) as of January 1, 2018. The facility Hazardous Waste Site Info Verification Report for Inspector identifies the facility as a LQG and on-site reclaimer of D001, D002, D003, D024, D025, D035 characteristic and F003 and F005 listed HW (Attachment 8). Mrs. Gutierrez stated that Axalta generates spent fluorescent lamps that are managed as universal waste (UW). Mrs. Gutierrez stated that Axalta generates used oil and used oil filters. I determined that the facility generates more than 1000 kg of D001, D035 characteristic and F003 and F005 listed HW monthly and therefore inspected Axalta as a LQG of HW, a small quantity handler (SQH) of universal waste (UW), and generator of used oil.

Based upon my visual inspection of current operations and processes, I recommend that EPA should follow up and clarify the status of the aforementioned HSM notification.

4.3 Facility Waste Streams and Management

Axalta generates hazardous wastes which exhibit one or more hazardous waste characteristics of ignitability, corrosivity, toxicity, or are listed as hazardous wastes. Axalta manufactures latex, acrylic, urethane, and polyester resins for use in formulating coatings. The resins are produced by batch in reactors. The production produces wastewater and various byproducts. The major quantities of hazardous waste produced are spent solvents from cleaning of the reactors and associated equipment between batches.

Mrs. Gutierrez described the waste characterization process for the facility. Waste characterization is based upon review of safety data sheets of raw materials used in the process, process review with process engineers and chemists for process knowledge, and documentation in a “waste characterization form.” I obtained copies of the most commonly used waste characterizations for waste streams generated by Axalta. Waste characterizations are attached for each waste stream described below. Each of these wastes is identified and tracked internally using unique waste codes. Non-RCRA hazardous waste codes begin with the letters “NHW”, and most hazardous waste codes begin with the letters “WOM.”

Axalta receives HW management support from a variety of vendors, generally based upon Axalta waste characterizations and facility availability/capacity. Vendors providing Axalta HW and non-RCRA hazardous management support are as follows:

- Hazmat Environmental Group (Hazmat) (NYD980769947), 60 Commerce Drive, Lackawanna, NY
- Green America Recycling, LLC (GAR) (MOD054018288), 10187 Highway 79, Hannibal, MO
- Tradebe Treatment and Recycling (Tradebe) (IND000646943), 4343 Kennedy Avenue, East Chicago, IN
- Lone Star Industries, Inc. (Lone Star) (MOD981127319), 2524 S. Sprigg Street, Cape Girardeau, MO
- Ross Incineration Services (Ross) (OHD048415665), 36790 Giles Road, Grafton, OH
- Covanta Environmental Solutions-Milwaukee (Covanta) (WID006085781), 5300 N. 33rd Street, Milwaukee, WI
- Safety-Kleen Systems (Safety-Kleen), 3935 W. 73rd Street, Davenport, IA.
- AERC Recycling Solutions (AERC), 2330 SW 26th Street, Allentown, PA, purchased by Clean Earth, 2591 Mitchell Avenue, #6609, Allentown, PA.
- Waste Management (WMI), 3204 Avenue N, Fort Madison, IA.

Axalta maintains a hazardous waste container accumulation area in Building 20 (Attachments 2 and 3) for hazardous and non-hazardous waste accumulated in 55-gallon (or smaller) containers. Wastes are shipped from Building 20 at least six times per year. In addition, bulk shipments of hazardous and non-RCRA hazardous wastes are shipped off-site in approximately 7,000-gallon truck tanker trailers once or twice per week.

Generally, bulk HW is transported off-site by Hazmat via trailer tank. GAR and Lone Star generally receive the bulk HW shipments that are used for energy recovery. Totes, drums, and smaller amounts of HW are generally picked up and transported off-site by Tradebe for solvents recovery. Ross receives HW that is incinerated and began receiving process wastewater in July 2021 that is now managed as HW. Covanta generally receives non-RCRA hazardous process wastewater. Selection of a specific treatment, storage, and disposal facility (TSDF) varies, depending upon TSDF capacity and availability.

The following waste streams are managed by Axalta:

General Trash: Mrs. Gutierrez stated that Axalta generates approximately nine six-cubic yard roll-off containers of general trash weekly. The general trash consists of waste office paper, lunch wastes, and miscellaneous cardboard and packing materials. Mrs. Gutierrez stated that the general trash has been determined to be non-RCRA hazardous, by virtue of product and process knowledge. The general trash is picked up weekly by WMI and transported off-site to the Great River Regional Waste Authority (GRRWA), 2092 303rd Avenue, Fort Madison, Iowa, for sanitary landfill disposal.

Dirty Solvent: Mrs. Gutierrez stated that Axalta generates a significant but unknown

amount of dirty solvent from the cleaning of production equipment. The dirty solvent has been determined to be a hazardous secondary material (HSM) being reclaimed on-site in a closed loop system. Rationale describing this process is attached (Attachment 9). HSM is also manifested off site as waste characterization H-30 weekly for solvent reclamation by Tradebe. Dirty solvent is accumulated in a tank (“Paint” tank) located inside Building 58 (Attachments 2 and 3). The solvent is reclaimed in a TFE located inside Building 58. Still bottoms from the TFE are characterized as Waste Solvent (WOM-0) and combined with the Waste Solvent (WOM-0) stored inside the “Sludge” tank described below. Significant quantities of dirty solvent exceed the capacity of the TFE for onsite solvent reclamation; therefore, between 25,000-40,000 pounds of HSM are manifested off-site weekly as H-30, Waste Acetone to Tradebe for solvent reclamation.

Waste Solvent (Axalta waste characterization WOM-0): Mrs. Gutierrez stated that Axalta generates more than 40,000 pounds of waste solvent weekly from cleaning production equipment and TFE still bottoms. A waste characterization of this Axalta WOM-0 waste resins and solvents waste stream is attached (Attachment 10). This waste stream is profiled as UN1993-Waste Flammable Liquid (xylene and toluene) and is managed as D001 and D035 characteristic and F003 and F005 listed HW. This waste stream is generated in Building 3, which houses three reactors (Reactors 1, 4 and 5) and associated equipment to produce resins and equipment for packaging of the resins in containers. A laboratory is located within Building 3 that analyzes production samples.

Satellite accumulation areas (SAA) and central accumulation areas (CAA) of hazardous waste have been designated at various locations in Building 3 (see Attachments 3 and 4). Axalta inspects the hazardous waste accumulation container and satellite accumulations weekly. 55-gallon and smaller SAA containers of HW are transferred to Building 20, designated as the hazardous waste central accumulation area (HWCAA). Contents of 300-gallon totes of HW transferred to the “Sludge” tank located inside Building 58. This tank is referred to as the “Sludge” tank, #MS-6 (Photo 1, Attachment 3). None of the HW accumulation exceeds 90 days.

Waste solvent is also hard piped from the production area in Building 3 to the “Sludge” tank located inside Building 58. The waste solvent is then transferred from the 8,150-gallon hazardous waste “Sludge” tank into 7,000-gallon hazardous waste truck tanker trailers that are accumulated on a concrete pad located outside Building 58 (Attachment 2). The tanker trailers containing the waste solvent are picked up and transported off-site by HAZMAT to either Lone Star or GAR for energy recovery.

Waste Acetone (Axalta waste characterization H-30): Mrs. Gutierrez stated that Axalta generates between 25,000 to 40,000 pounds of waste acetone weekly from cleaning production equipment. A waste characterization of this Axalta H-30 waste acetone waste stream is attached (Attachment 11). This waste stream was described as HSM above. This waste stream is profiled as UN1090-Waste Acetone and is managed as D001 characteristic HW. This waste stream is generated in Building 3 from production vessel cleaning and is accumulated in an 8,150-gallon hazardous waste accumulation tank located inside Building 58 that has been designated as the “Paint” tank (Photo 2, Attachment 3). The waste acetone is either reclaimed on-site using a TFE or transferred from the 8,150-gallon hazardous waste “Paint” tank into 7,000-gallon hazardous waste truck tanker trailers accumulated on a concrete pad located outside Building 58 (Attachment 2). The waste acetone collected in the truck tanker trailers is picked up and transported off-site by Tradebe for energy solvents reclamation.

Waste Resin Solutions (Axalta waste characterization WOM-408A): Mrs. Gutierrez stated that Axalta generates approximately two 55-gallon containers of waste resin solutions every four months from production. A waste characterization of this Axalta WOM-408A waste stream is attached (Attachment 12). This waste stream is profiled as UN1993-Waste Flammable Liquid (acetone) and is managed as D001 characteristic and F003 listed HW. This waste stream is generated in Building 3 from resin production and is accumulated in 55-gallon containers located inside Building 3. When full, the 55-gallon containers are transported from Building 3 to the HWCAA located in Building 20. The 55-gallon containers of waste resin solutions are picked up and transported off-site by Tradebe for fuel blending prior to energy recovery.

Resin Wastewater (Axalta waste characterization WOM-389): Mrs. Gutierrez stated that Axalta changed some resin manufacturing processes in July 2021. Prior to the change, Axalta treated process wastewater in Building 49 that was discharged under permit to the Fort Madison water treatment facility. However, the manufacturing process change now produces process wastewater that no longer meets the permit standards for discharge to the Fort Madison publicly owned treatment works (POTW). Therefore, Mrs. Gutierrez stated that Axalta now generates between 40,000 to 42,000 pounds of resin wastewater weekly from manufacturing activities. This waste stream is managed as HW. A waste characterization of this Axalta WOM-389 waste stream is attached (Attachment 13). This waste stream is profiled as UN3082-Environmentally Hazardous Substance (methyl ethyl ketone (MEK) and acetone) and is managed as D001 and D035 characteristic and F003 and F005 listed HW. This waste stream is generated in Building 3 from resin production and is direct piped to three tanks that hold approximately 5,000 gallons located in Building 49 (Tanks 208, 209, and 210) (Photo 7, Attachment 3). Solvent is skimmed from the contents of the tanks and direct piped to Tank #211 located in Building 49 (Photo 8, Attachment 3). The contents of Tank #211 are direct piped to the “Paint” tank located in Building 58. It appears that the Tank 211 Decant Tank is a holdover from the process wastewater treatment process that is no longer permitted for discharge to the POTW. The contents of the three tanks containing resin wastewater (Tanks 208, 209, and 210) are no longer discharged to the POTW. Instead, the contents of Tanks 208, 209, and 210 are managed as Axalta WOM-389 and are transferred into 7,000-gallon hazardous waste truck tanker trailers accumulated on a concrete pad located outside Building 58 (Attachment 2). The waste resin wastewater is picked up and transported off-site by Ross for incineration. The tanks (#208, 209, 210, and 211) located inside Building 49 were not identified as containing Hazardous Waste. The nature of the contents of all of the tanks housed in Building 49 was unclear. Therefore, a HW determination on the contents of Tank 211 was requested, as discussed below in Section 4.4, Visual Inspection of the Facility. After the inspection, additional information was also requested for Tanks 208, 209, and 210 as discussed below and referenced in Attachment 28.

Waste Filtration Media (Axalta Waste Characterization WOM-5): Mrs. Gutierrez stated that Axalta has generated approximately 101 55-gallon containers of waste filtration media thus far in calendar year 2022. The waste filtration media consists of spent filters used to filter product resins in the production area inside Building 3. A waste characterization of this Axalta WOM-5 waste stream is attached (Attachment 14). This waste stream is profiled as UN1325-Waste Flammable Solids, Organic and is managed as D001 and D035 characteristic HW and F003 and F005 listed HW. This waste stream is generated in Building 3 from production vessel cleaning and is accumulated in 55-gallon hazardous waste containers and transported from Building 3 to the HWCAA located in Building 20. The waste filtration media is picked up and transported off-site by Tradebe for solvents extraction/reclamation.

Latex Production Solids (Axalta Waste Characterization NHW-62B): Mrs. Gutierrez stated that Axalta has generated approximately 81 55-gallon containers of waste latex production solids thus far in calendar year 2022. A waste characterization of this waste Axalta NHW-62B waste stream is attached (Attachment 15). This waste stream has been determined to be non-RCRA hazardous by virtue of product and process knowledge. This waste stream is generated in Building 3 and transported from Building 3 to the HWCAA located in Building 20. The waste latex production solids are picked up and transported off-site by Tradebe.

Latex Filtration Media (Axalta Waste Characterization NHW-6): Mrs. Gutierrez stated that Axalta has generated approximately 181 55-gallon containers of waste latex filtration media thus far in calendar year 2022. A waste characterization of this waste Axalta NHW-6 waste stream is attached (Attachment 16). This waste stream has been determined to be non-RCRA hazardous by virtue of product and process knowledge. This waste stream is generated in Building 3 and transported from Building 3 to the HWCAA located in Building 20. The waste latex filtration media waste stream is picked up and transported off-site by Tradebe.

Latex Production Wastewater (Axalta Waste Characterization NHW-62S): Mrs. Gutierrez stated that Axalta generates approximately one 7,000-gallon (approximately 41,500 pounds) truck tank trailer of latex production process wastewater weekly. A waste characterization of this waste Axalta NHW-62S waste stream is attached (Attachment 17). This waste stream has been determined to be non-RCRA hazardous by virtue of product and process knowledge. This waste stream is transported off-site by HAZMAT to Covanta.

Miscellaneous/Episodic/One Time HW Generation (Axalta Waste Characterizations WOM-365, WOM-467, WOM-475, and WOM-494): Ms. Gutierrez stated that Axalta has generated episodic and/or one-off waste streams described in Attachment 18 as follows:

- WOM-365: One 55-gallon container weighing approximately 550 pounds manifested off-site on uniform hazardous waste manifest (UHWM) #016639082FLE dated March 15, 2022 consisting of old piping managed as D001, D035 characteristic and F003 and F005 listed HW that was picked up and transported off-site by Tradebe. Disposition is unknown.
- WOM-467: One 55-gallon container weighing approximately 100 pounds manifested off-site on UHWM #023911078JJK dated April 8, 2022 consisting of a bad resin managed as D002 characteristic HW that was picked up and transported off-site by Tradebe for fuel blending.
- WOM-475: 32 55-gallon containers weighing approximately 14,700 pounds manifested off-site on UHWM #021967931JJK dated March 15, 2022 and three 55-gallon containers weighing approximately 2,000 pounds manifested off-site on UHWM #023911078JJK dated April 8, 2022 consisting of tank clean-out material managed as D001 characteristic, U031, and U197 listed HW that was picked up and transported off-site by Tradebe for fuel blending.
- WOM-494: One 55-gallon container weighing approximately 300 pounds manifested off-site on UHWM #023911078JJK dated April 8, 2022 consisting of expired raw materials managed as D001 and D002 characteristic HW that was picked up and transported off-site by Tradebe where it was stored and transferred

off-site with no treatment or recovery at the receiving site.

Waste Aerosol Cans: Mrs. Gutierrez stated that Axalta generates between five to ten RCRA-empty waste aerosol cans monthly. The waste aerosol cans include glass cleaner and similar cleaning products, brake cleaner, penetrating oil, and spray paint. The empty waste aerosol cans are currently collected in a 55-gallon container located in the UW storage area located inside the Maintenance Storage Area. The waste aerosol cans are currently managed as D001 characteristic HW. Mrs. Gutierrez expressed interest in learning more about managing waste aerosol cans as universal waste (UW), which was addressed as compliance assistance during our exit briefing.

Spent Fluorescent Lamps: Mrs. Gutierrez stated that Axalta generates approximately 100 spent four-foot fluorescent lamps annually. The spent fluorescent lamps are managed as UW and are picked up and transported off-site by AERC/Clean Earth for recycling. Axalta last shipped 93 four-foot UW-Lamps and 50 used spiral fluorescent lamps off site on July 16, 2021, as evidenced by Attachment 19.

Spent Lead-Acid Batteries: Mrs. Gutierrez stated that Axalta last generated approximately 175 used lead acid batteries managed as UW on July 16, 2021, also evidenced by Attachment 19. The used lead-acid batteries were picked up and transported off-site by AERC/Clean Earth for recycling.

Used Lithium-Ion batteries: Mrs. Gutierrez stated that Axalta last generated approximately 50 used Lithium-Ion batteries managed as UW on July 16, 2021, also evidenced by Attachment 19. The used Lithium-Ion batteries were picked up and transported off-site by AERC/Clean Earth for recycling.

Used/Spent Ballasts: Mrs. Gutierrez stated that Axalta last generated approximately 200 used/spent ballasts managed as UW that were picked up on January 28, 2022 and transported off-site by AERC/Clean Earth for recycling as shown on Attachment 20.

Used/Spent Mercury Containing Devices: Mrs. Gutierrez stated that Axalta last generated approximately 35 mercury containing devices managed as UW on January 28, 2022, also evidenced by Attachment 20. The mercury containing devices were picked up and transported off-site by AERC/Clean Earth for recycling.

Used Oil: Mrs. Gutierrez stated that Axalta generates approximately two 55-gallon containers of used oil annually. The used oil is collected in 55-gallon containers located on the upper floor of Building 3 above the maintenance truck shop. According to Mrs. Gutierrez, the used oil is combined with WOM-0 waste at the time of pick up and transported off-site by HAZMAT to GAR or Lone Star for fuel blending.

Used Oil Filters: Mrs. Gutierrez stated that Axalta generates approximately seven used oil filters annually. The used oil filters are drained and placed into 55-gallon containers. When full, the 55-gallon containers are emptied into a roll-off container located outside the facility. According to Mrs. Gutierrez, the used oil filters are combined with a WOM-7 waste stream generated in the maintenance shop. An AXALTA waste characterization for WOM-7 is attached (Attachment 21).

The WOM-7 waste stream is managed as D001 and D035 characteristic HW and is picked up and transported off-site by Tradebe for solvents recovery.

Used Oil Absorbents: Mrs. Gutierrez stated that Axalta generates approximately one five-gallon step canister of used oil absorbents weekly. According to Mrs. Gutierrez, the used oil absorbents are transferred from the five-gallon step canister to a 55-gallon container and combined with the WOM-7 waste stream generated in the maintenance shop and discussed above.

Solvent Contaminated Wipes: Mrs. Gutierrez stated that Axalta generates approximately 100 solvent contaminated wipes weekly. According to Mrs. Gutierrez, the solvent contaminated wipes are collected in a 55-gallon container and combined with the WOM-7 waste stream generated in the maintenance shop and discussed above. However, an examination of the WOM-7 waste characterization (Attachment 21) did not identify any listed wastes generated by spent solvents. I asked the facility for clarification of this waste characterization via email (Attachment 28). A response had not been received from the facility at the time of this report writing.

Scrap Metal: Mrs. Gutierrez stated that Axalta generates one roll-off container of approximately 1,500 pounds of scrap metal annually. The scrap metal is picked up and transported off-site by Alter Metal Recycling – Burlington, 2101 NW Burlington Ave, West Burlington, Iowa, for recycling.

4.4 Visual Inspection of Facility Waste Stream Management

I conducted a visual inspection of the facility with Mrs. Gutierrez. The visual inspection was conducted to observe waste stream management practices and document regulatory compliance. Photographs, checklists, and field notes were used to document observations made during the visual inspection. A Photo Log was created, and photos taken during the inspection appear in Attachment 27. Attachments 3 and 4 were annotated to show where photos were taken during the visual inspection.

Building 58: I observed the interior of Building 58. Building 58 houses two large HW storage tanks (“Sludge” tank and “Paint” tank), a TFE, a large clean solvent tank, and 55-gallon HW SAA containers.

Dirty Solvent “Paint” Tank: Axalta refers to solvent used for production tank rinses (and from the wastewater decant tank located inside Building 49) as “dirty solvent.” Dirty solvent is hard piped to Building 58 for solvent recovery using a TFE unit. The 8,150-gallon tank containing the “dirty solvent” (“Paint” tank) is within a concrete secondary containment dike shared with the Sludge Tank. Mrs. Gutierrez stated that the TFE system is a closed-loop system and dirty solvent is a secondary material being reclaimed and returned to the generating process. She explained that the dirty solvent is hard piped from the production areas to the “Paint” tank and another overflow tank outside Building 58 which serve as holding tanks prior to reclamation using the TFE. The dirty solvent tanks are hard-piped to the TFE, which is hard-piped to a “Clean Solvent” tank (Photo 1, Attachment 3). Distillation bottoms are piped to the “Sludge Tank” (Photo 2, Attachment 3). The “Dirty Solvent” (“Paint”) tank contains spent acetone that is managed as D001 characteristic and F003 listed HW. I inspected this “Paint” tank labeled as “HAZARDOUS

WASTE” (Photo 2, Attachment 3) and waste stream as HW because the HW accumulated in the “Paint” tank is sometimes reclaimed onsite but is also sometimes manifested offsite as HW. The tank has a capacity of 8,150 gallons and is equipped with a top mounted agitator. The tank was labeled “Hazardous Waste” with the National Fire Protection Association (NFPA) hazard codes S-3, H-2, F-3, and R-1. The tank was constructed in 1988 to the specifications in American Society of Mechanical Engineers (ASME) Section VIII Division I: Design and Fabrication of Pressure Vessels. The tank is inspected every five years for thickness following American Petroleum Institute (API) 510-Pressure Vessel Inspection Code: In-Service Inspection, Rating, Repair, and Alteration. I did not observe any apparent issues or findings related to the Dirty Solvent tank. Dirty solvent is characterized as H-30 discussed above.

Sludge Tank: Axalta refers to a second hazardous waste accumulation tank located inside Building 58 as the “Sludge” tank. The 8,150-gallon “Sludge” tank is within a concrete secondary containment dike shared with the Dirty Solvent (paint) tank. The Sludge Tank is filled with WOM-0 HW waste, managed as D001 and D035 characteristic and F003 and F005 listed HW. TFE distillation bottoms are accumulated in the Sludge Tank along with WOM-0 wastes generated in the Building 3 Production Area. The tank has a capacity of 8,150 gallons and is equipped with a top mounted agitator. The tank was labeled “Hazardous Waste” with the National Fire Protection Association (NFPA) hazard codes S-3, H-2, F-3, and R-1. The tank was constructed in 1988 to the specifications in American Society of Mechanical Engineers (ASME) Section VIII Division I: Design and Fabrication of Pressure Vessels. The tank is inspected every five years for thickness following American Petroleum Institute (API) 510-Pressure Vessel Inspection Code: In-Service Inspection, Rating, Repair, and Alteration. I inspected the tank as a HW storage tank and did not observe any apparent issues or findings related to the “Sludge” tank. Sludge is characterized as WOM-0 discussed above.

HW SAA-WOM-5: I observed one 55-gallon container that was not empty and was approximately 1/3-full of polymer filtration media characterized by Axalta as WOM-5 HW, managed as D001 and D035 characteristic and F003 and F005 listed HW (Photos 3 and 4, Attachment 3). The container was closed, labeled HAZARDOUS WASTE, and displayed a label describing the nature of the container’s contents. Mrs. Gutierrez explained that when full, the 55-gallon container would be moved from Building 58 to the HWCAA located in Building 20 where the container would be dated and staged for pickup by Tradebe as discussed above.

Building 20: Building 20 houses Axalta’s main HWCAA. I observed an emergency contact placard located inside the entrance to the building (Photo 5, Attachment 3). Mrs. Gutierrez stated that all logistics personnel working inside the HWCAA are outfitted with two-way radios for emergency communications. She added that emergency contact information was being updated and provided a copy of the new emergency contact sheet (Attachment 22). Mrs. Gutierrez explained that Tradebe picked up containers of HW that had been stored inside the HWCAA the day before this inspection. Therefore, I did not observe any containers of HW being stored inside the HWCAA at this time. I observed approximately 26 55-gallon containers of non-RCRA hazardous Latex-related material managed as Axalta characterization NHW-62B and NHW-6, shown in Photo 6, Attachment 3. I did not have any concerns with the availability of emergency response equipment, e.g., fire extinguishers, spill cleanup kits, decontamination equipment, and alarms for summoning emergency assistance for responding to fires or releases in Building 20.

Building 49: Building 49 houses tanks associated with wastewater treatment.

Mrs. Gutierrez explained that non-RCRA hazardous process wastewater generated during Latex product is managed as Axalta NHW-62S and shipped off-site in tank trailers to Covanta as described above. She stated that process wastewater from polymer resin production was pretreated and discharged to the City of Fort Madison's POTW until July 2021. A change in production processes produce process wastewater that no longer meets permitted standards; process wastewater is now managed as D001 and D035 characteristic and F003 and F005 listed HW and characterized by Axalta as WOM-389 described above. The tanks inside Building 49 that were previously used for wastewater treatment are still filled with fluids. I observed three large tanks (Tanks 208, 209, and 210) (Photo 7, Attachment 3) that Mrs. Gutierrez stated contained resin wastewater. She stated that any solvent contained in the wastewater was "skimmed from the tanks" and piped to a fourth tank located inside Building 49 (Tank 211) (Photo 8, Attachment 3). The contents of the fourth tank, Tank TK-211, Decant Process, was hard piped to Building 58 where it was combined with dirty solvent later distilled by the TFE. I noted that none of the tanks in Building 49 were labeled as HW. Therefore, I made the following preliminary finding: **Axalta must conduct a HW determination on the contents of Tank 211 Decant Process, located inside Building 49, in accordance with 40 CFR §262.11 (NOPF No. 11 (a), Attachment 7).** While reviewing my notes and writing this report, I realized that the contents of Tanks 208, 209, and 210 were now filled with the WOM-389 waste stream characterized by Axalta as D001 and D035 characteristic and F003 and F005 listed HW that was being manifested off-site to Ross for incineration. None of the tanks located inside Building 49 were identified as HW nor was there any indication of the nature of the tanks' contents. Therefore, I sent an email to the facility asking for clarification on the contents of these tanks (Attachment 28). I followed up this email with a telephone call with Mrs. Gutierrez on July 7, 2022. Mr. Gutierrez stated that her response to the questions posed in my email were being reviewed by her Corporate office and would be forthcoming in the near future. I responded that I would include this information in my report for EPA follow up.

Building 3: I observed a closed, labeled, approximate 300-gallon tote containing "sludge" managed as Axalta characterization WOM-0 (D001 and D035 characteristic and F003 and F005 listed HW) pictured in Photo 9, Attachment 4. Mrs. Gutierrez stated that the tote contained approximately 30 gallons of HW, based upon her knowledge of inventory records. I confirmed that the container was not empty. I did not observe any label affixed to the tote identifying the nature of the tote's contents. Therefore, I documented the following finding: **Axalta must label containers of HW with an indication of the nature of the hazard in accordance with 40 CFR §262.15(a)(5)(ii) (NOPF No. 6, Attachment 7).** I observed one 55-gallon container that was not empty and was approximately ½-full of waste polymer filters managed as Axalta characterization WOM-5 (D001 and D035 characteristic and F003 and F005 listed HW) located in the Building 3 Press Room as shown in Photo 10, Attachment 4. The container was closed, labeled HAZARDOUS WASTE, and bore a label describing the nature of the waste contained within the container. I observed one 55-gallon container in the Production Area of Build 3, shown in Photo 11, Attachment 4. The container was not empty and was approximately ¼-full of Axalta's WOM-408A (D001 characteristic HW). The funnel lid attached to the 55-gallon container was NOT latched and therefore NOT CLOSED at the time of the inspection (Photo 12, Attachment 4). **Axalta must keep containers of HW closed in accordance with 40 CFR §261.15(a)(4) (NOPF No. 7, Attachment**

7). Mrs. Gutierrez latched the lid and closed the container during this inspection (Photo 13, Attachment 4). I observed a closed 300-gallon tote located on the production floor inside Building 3 that was not empty and contained approximately 40 gallons of Axalta WOM-0 characterized HW (D001, D035 characteristic and F003 and F005 listed HW) as shown in Photo 14, Attachment 4. The container was closed, appeared to be structurally sound, was labeled with the words HAZARDOUS WASTE and labeled to describe the nature of the contents of the container.

I observed several containers of HW inside the Quality Assurance Laboratory located inside Building 3. I observed one five-gallon SAA container that was not empty and was approximately ½-full of HW characterized as WOM-0 and managed as D001 and D035 characteristic and F003 and F005 listed HW (Photo 15, Attachment 4). The container was closed and labeled as HAZARDOUS WASTE and identified the nature of the container's contents. I observed two closed five-gallon containers, each containing approximately two gallons of HW characterized as WOM-0 (D001 and D035 characteristic and F003 and F005 listed HW) and WOM-408A (D001 characteristic HW) as shown in Photo 16, Attachment 4. Both containers were closed, labeled as HAZARDOUS WASTE, and described the nature of the containers' contents. I observed one 55-gallon container that was not empty and appeared to be approximately 1/3-full of contaminated laboratory glassware. The container was closed, labeled with the words HAZARDOUS WASTE, and bore a label identifying the nature of the container's contents. I also observed a general trash receptacle located inside the Quality Assurance Laboratory shown on Photos 18 and 19, Attachment 4. I observed a variety of items in the general trash receptacle, to include used nitrile gloves used as personal protective equipment (PPE). I asked Mrs. Gutierrez if Axalta had conducted a HW determination on the general trash contained in the receptacle and general trash generated inside the Quality Assurance Laboratory, to which she responded negatively. **Axalta must conduct a HW determination on general trash generated inside the Quality Assurance Laboratory in accordance with 40 CFR §262.11. (NOPF No. 11(b), Attachment 7).**

Building 4-Maintenance: I observed one 55-gallon container located inside the Maintenance Area of Building 4 as shown in Photo 20, Attachment 4. The container that was not empty and appeared to be approximately 1/3-full of solvent contaminated wipes that are managed as Axalta's WOM-7 waste characterization (D001 and D035 characteristic HW). The container appeared to be structurally sound, was closed, and was labeled with the words HAZARDOUS WASTE and bore a label describing the nature of the container's contents. I also observed six 55-gallon containers shown in Photo 21 located in the Maintenance Storage Area, designated as the UW storage area (Photo 21, Attachment 4). The six 55-gallon containers located in the UW-Storage Area were (from left to right in Photo 21):

- Alkaline Batteries (approximately 50)
- Empty
- NiCad Batteries (approximately 25)
- Lead-Acid Batteries (three Exit sign batteries)
- Ballasts (two)
- Aerosol Cans (approximately 50)

All of the containers were closed, dated, and labeled, apart from the empty container.

I also observed a cardboard container of spent four-foot fluorescent lamps stored in the Maintenance Area as shown in Photo 22, Attachment 4. A closeup photo of the label affixed to this full cardboard container of spent fluorescent lamps is shown in Photo 23, Attachment 4. Closer examination revealed a smaller open, unlabeled, undated, cardboard container containing approximately 18 spent fluorescent lamps pictured in Photo 24, Attachment 4. The cardboard container containing approximately 18 spent fluorescent lamps was open, did not identify the contents of the container, and did not demonstrate a means to determine how long the spent fluorescent lamps had been accumulating (Photo 24, Attachment 4). I asked Mrs. Gutierrez how long the spent lamps had been accumulating, to which she responded she “did not know.” Therefore, the following preliminary findings were documented: **Axalta failed to demonstrate the length of time 18 UW-Lamps had been accumulated in accordance with 40 CFR §262.273.15(c) (NOPF No. 8, Attachment 7); Axalta failed to keep a container of approximately 18 UW-Lamps closed in accordance with 40 CFR § 273.13(d)(1) (NOPF No. 9, Attachment 7); and Axalta failed to label containers of spent fluorescent lamps as “UW-Lamps”, or “Waste Lamps”, or “Used Lamps” in accordance with 40 CFR §273.14(e) (NOPF No. 10, Attachment 7).**

Building 10 (Upstairs): I observed 55-gallon containers designated for Used Oil located above the Maintenance Truck Shop (Photo 26, Attachment 4). One of the 55-gallon containers was filled with used oil and was labeled with the words “Used Oil” as stipulated in 40 CFR §279.22(c)(1).

No other environmental issues or areas of concern were observed during this visual examination.

4.5 Documentation

Prior to this CEI, I reviewed the Axalta Comprehensive Biennial Report last updated on 03/29/2021. I also reviewed the e-manifest report documenting approximately 486 electronic uniform hazardous waste manifests (UHWM) for HW generated by this facility, spanning the period of June 30, 2012 to September 18, 2021. After this CEI, I reviewed a second e-manifest report documenting 85 electronic UHWM for HW generated during the period January 1, 2022 through June 21, 2022.

Mrs. Gutierrez provided a spreadsheet generated by Axalta documenting HW shipments during the 2022 calendar year, documenting approximately 127 shipping line items occurring during the period January 15, 2022 thru May 17, 2022 (Attachment 23).

I did not observe any discrepancies with the shipping documentation/manifests maintained by the facility.

4.6 Preparedness and Prevention

Axalta has designated Mr. Jeff Wilkens, EHS Manager, as an emergency coordinator who is on premises or on call. Alternate emergency coordinators are Mr. Darin Otte, Product Manager-Polymer, and Mrs. Gutierrez. Mrs. Gutierrez stated that Mr. Wilkens is thoroughly familiar with all aspects of Axalta’s operations. Mrs. Gutierrez stated that Mr. Wilkens has made arrangements with

local emergency agencies and has familiarized emergency agencies with the layout of the facility, properties of hazardous waste handled at Axalta, normal work locations, entrances and roads inside the facility, possible evacuation routes, and typical injuries or illnesses which could result from an incident. Mrs. Gutierrez was not aware of documentation documenting the arrangements with emergency response agencies but added that Mr. Wilkens maintained this documentation.

4.7 Contingency Planning

Mrs. Gutierrez stated that Axalta has a contingency plan that is currently being revised and is being reviewed by Mr. Wilkens; the updated plan was not available for review at the time of this inspection. A finding was made at the time of this inspection as follows: **Axalta must review and amend their contingency plan when(a) regulations are revised; (b) the plan fails an emergency; (c)the generator's operations materially change to increase risk of fire, explosions, or release; (d) the emergency coordinators change; or the emergency equipment changes in accordance with 40 CFR 262.17(a)(6) →262.263(a-e) (NOPF No. 1, Attachment 7).** After review, I have rescinded this finding because I did not determine why the contingency plan was being reviewed/revised. I asked Mrs. Gutierrez if Axalta had prepared a quick reference guide and submitted it to emergency response agencies, to which she responded that she was not aware of an Axalta quick reference guide. **Axalta must prepare a quick reference guide and submit it to emergency response agencies in accordance with 40 CFR §262.17(a)(6) →262.262(b) (NOPF No. 2, Attachment 7).** I provided assistance to Mrs. Gutierrez and described the contents of the quick reference guide: (1) list and description of hazardous waste described in layman's terms; (2) estimated maximum amounts of each hazardous waste; (3) identification of any hazardous waste that would result in unique or special medical issues; (4) a map showing where hazardous waste is generated or managed and access routes top these locations; (5) a map of the facility in relation to surrounding businesses; schools, and residential areas to allow access and evacuation planning; (6) locations of water supplies; (7) identification of on-site notification systems or alarms; and (8) name and 24/7 telephone number for the emergency coordinator as outlined in 40 CFR §262.17(a)(6) →262.262(b)(1) through (b)(8).

4.8 Personnel Training

Mrs. Gutierrez stated that Axalta trains hazardous waste personnel to perform their duties in a way that ensures compliance using a program of on-the-job training and classroom instruction. She stated that she has received training in hazardous waste management procedures. She stated that Axalta initially trains new employees within 6 months of employment or assignment. I asked to see an example of annual refresher training given to hazardous waste personnel, to which she responded she was not aware of any annual refresher training. **Axalta must refresh hazardous waste training annually in accordance with 40 CFR §262.17(A)(7)(iii) (NOPF No. 3, Attachment 7).** I asked Mrs. Gutierrez how Axalta tracks specific job titles and names of persons filling hazardous waste positions, to which she responded she was not aware of any such tracking system. However, she provided me a spreadsheet identifying the names of personnel normally involved in handling and managing HW (Attachment 24). **Axalta must track specific job titles and names of persons filling positions in accordance with40 CFR §262.17(a)(7)(iv)(A) (NOPF No. 4, Attachment 7).** I asked Mrs. Gutierrez if Axalta describes, in writing, skills, education, or qualification , and duties associated with each job title of individuals performing hazardous waste

management/handling duties. Mrs. Gutierrez responded by providing me a copy of the job description for a Polymer Process Technician (Attachment 25) and her job description (Attachment 26). She stated that the Polymer Process Technicians were responsible for moving HW and labeling HW containers. I reviewed the two job descriptions and determined that the job descriptions do not contain a description of the hazardous waste management/handling duties associated with the position(s). **Axalta must describe, in writing, skills, education or qualification, and duties associated with each job title involved with the handling or management of hazardous waste in accordance with 40 CFR §262.17(a)(7)(iv)(B) (NOPF No. 5, Attachment 7).**

4.9 RCRA Air Emissions

I confirmed that Axalta had addressed the findings documented in the previous inspection report for the inspection conducted February 25-28, 2019.

4.10 Reporting and Re-notification

Prior to this CEI, I reviewed the Axalta Comprehensive Biennial Report last updated on March 29, 2021. I also confirmed that Axalta has re-notified the EPA for hazardous waste activity in accordance with 40 CFR §262.18(d)(2).

5.0 SUMMARY

The previous inspection conducted February 25-28, 2019, inspected Axalta as a large quantity generator of hazardous waste, small quantity handler of universal waste, and a used oil generator. The following apparent violations/issues were documented during that inspection:

NOV 1 – 40 CFR 265.1085(c)(3)(ii): Conservation Vent Body, Vacuum Vent and Emergency Vent Exceeds No Detectable Emissions.

NOV 2 – 40 CFR 265.1087(d)(1)(ii): Level 2 Container Exceeds No Detectable Emissions.

NOV 3 – 40 CFR 265.1050(c), 40 CFR 265.1057(a) and 40 CFR 265.1058(a): Equipment subject to Subpart BB Not Identified and Monitored.

NOV 4 – 40 CFR 262.17(a)(5)(i)(C): Five truck trailer tanks of hazardous waste not marked with accumulation start date.

I documented the following preliminary findings during this CEI:

NOPF No. 1: 40 CFR 262.17(a)(6) → 262.262(e): Review and amend contingency plan. (Attachment 7). This finding is rescinded.

NOPF No. 2: 40 CFR §273.15(c): Provide a quick reference guide to emergency agencies (Attachment 7).

NOPF No. 3: 40 CFR §262.17(a)(7)(iii): Conduct HW refresher training annually

(Attachment 7).

NOPF No. 4: 40 CFR §262.17(a)(7)(iv)(A): Track specific job titles and names of person filling positions (Attachment 7).

NOPF No. 5: 40 CFR §262.176(a)(7)(iv)(B): Describe, in writing, skills, education or qualification, and duties associated with each job title (Attachment 7).

NOPF No. 6: 40 CFR §262.15(a)(5)(ii): Label SAA containers of HW with an indication of the nature of the hazard (Attachment 7).

NOPF No. 7: 40 CFR §262.15(a)(4): Keep SAA containers of HW closed (Attachment 7).

NOPF No. 8: 40 CFR §273.15(c): Failure to demonstrate the length of time 45 UW-Lamps had been accumulated (Attachment 7).

NOPF No. 9: 40 CFR §273.13(d)(1): Failure to keep container of 46 spent fluorescent lamps closed (Attachment 7).

NOPF No. 10: 40 CFR §273.14(e): Failure to label containers of spent fluorescent lamps as “UW-Lamps”, or “Waste Lamps”, or “Used Lamps” (Attachment 7).

NOPF No. 11: 50 CFR 262.11: Conduct a HW determination on:

- a. The contents of Tank 211, located in Building 49; and**
- b. General trash in the Quality Laboratory containing waste nitrile gloves (PPE) and other laboratory wastes (Attachment 7).**

EPA should follow up on the following matters:

- HSM notification status for HSM process.
- HW Characterization of WOM-7 (solvent contaminated wipes added to waste stream); and
- HW determination on the contents of Tanks 208, 209, 210, and 211 located inside the Process Wastewater Treatment Building, Building 49 and the regulatory status of the four tanks.

Other than the items specifically noted in this narrative, I observed no additional issues or potential findings. However, further EPA review may change or add to my findings.

HURLEY BRYANT
(Affiliate)

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Date: 7/11/2022

H. D. "Doug" Bryant, CPP, PCI
Civil Investigator, SEE

AMBER WHISNANT

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Amber Whisnant

Chief, RCRA Section, Chemical Branch
Enforcement and Compliance Assurance Division
Attachments:

- 1) Business Card (1 page)
- 2) Site Map/Diagram (1 page)
- 3) Annotated Building Diagram #1 (1 page)
- 4) Annotated Building Diagram #2 (1 page)
- 5) Confidentiality Notice (1 page)
- 6) Receipt of Document and Samples (1 page)
- 7) Notice of Preliminary Findings (1 page)
- 8) Notification Acknowledgement/Verification Report (2 pages)
- 9) Axalta Documentation of Legitimate Recycling (4 pages)
- 10) Axalta Waste Characterization WOM-0, Waste Resins and Solvents (16 pages)
- 11) Axalta Waste Characterization H-30, Waste Acetone (1 page)
- 12) Axalta Waste Characterization WOM-408A, Waste Resin Solutions (4 pages)
- 13) Axalta Waste Characterization WOM-389A, Resin Wastewater (4 pages)
- 14) Axalta Waste Characterization WOM-5, Waste Filtration Media (4 pages)
- 15) Axalta Waste Characterization NHW-62B, Latex Production Solids (4 pages)
- 16) Axalta Waste Characterization NHW-6, Latex Filtration Media (4 pages)
- 17) Axalta Waste Characterization NHW-6S, Latex/PUR Wastewater (4 pages)
- 18) Axalta email, RE: WOM408A, June 22, 2022 (2 pages)
- 19) AERC Recycling Solutions Bill of Lading (BOL) CGGF 36992, dated July 16, 2021 (1 page)
- 20) AERC BOL CGGF 37022, dated January 22, 2022 (1 page)
- 21) Axalta Waste Characterization WOM-7, Grease/Resin/Solvent/Paint Contaminated Wipes (4 pages)
- 22) Axalta Emergency Contacts (1 page)
- 23) Axalta spreadsheet, HW Shipping Manifests, January 14, 2021 thru May 17, 2022 (4 pages)
- 24) Axalta spreadsheet, HW Handling Personnel (1 page)
- 25) Axalta Job Description, Polymer Process Technician (1 page)
- 26) Axalta Job Description, EHS Specialist (2 pages)
- 27) Photo log (3 pages) and Photos (26 pages)
- 28) Email, July 5, 2022, Subject: Waste Characterization WOM-7 and Process Wastewater Tanks(Building 49) (1 page)