

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

DONALDSON COMPANY

111 Donaldson Court
Cresco, Iowa 52136
563-547-1431

EPA ID Number: IAD006224661

On

June 3, 2024

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 Donaldson Company (Donaldson) at 111 Donaldson Court, Cresco, 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

Donaldson:

Eric Phillips, Engineering Manager

Virginia Spence, Senior Manager, Environmental and Safety (EHS) (entry and exit briefing only by teleconference)

Michael O'Donnell, Manufacturing Engineer

Toeroek Team:

Clifford Nelles, Inspector, 816-213-5192

INSPECTION PROCEDURES

Prior to the CEI at Donaldson on June 3, 2024, I conducted a drive-by visual inspection. I did not observe any areas of concern during the drive-by. Upon my arrival, I entered the visitor's entrance and explained the purpose of the CEI to the reception attendant. I asked to speak with Mr. Phillips, who was identified as the Site Contact on the Notification Acknowledgement/Verification Report (Verification Report) provided by the EPA prior to the CEI (Attachment 1). The reception attendant contacted Mr. Phillips to inform him of my arrival. Messrs. Phillips and O'Donnell met me in a conference room near the lobby approximately five minutes later. I introduced myself to Messrs. Phillips and O'Donnell and explained the purpose of the CEI to them. I then conducted an entry briefing with Messrs. Phillips and O'Donnell. Ms. Spence joined the entry briefing via teleconference.

During the entry briefing, I presented my business card and EPA credentials to Messrs. Phillips and O'Donnell, and 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. Phillips 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 Messrs. Phillips and O'Donnell a copy of U.S. Federal Codes 1001 and 1002, concerning communication of false statements and documents to federal inspectors, and RCRA Section 3007, explaining EPA's inspection authority, both of which they read.

A copy of each of the following documents was left with Mr. Phillips during the inspection:

- RCRA Facility Access Information Sheet
- RCRA Section 3007
- U.S. Federal Codes 1001 and 1002
- Notice Regarding Proprietary/Confidential Business Information
- Notice of Responding to a Notice of Preliminary Findings

The following handouts were emailed to Mr. Phillips after the CEI.

- 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. Phillips (Attachment 1). Based on this review, I made no changes to the Verification Report.

I conducted a visual inspection of the facility, accompanied by Messrs. Phillips and O'Donnell. 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 Messrs. Phillips and O'Donnell. Ms. Spence joined the exit briefing via teleconference. During the exit briefing, I provided a Receipt for Documents and Samples, which Mr. Phillips signed, acknowledging receipt (Attachment 2). I provided Mr. Phillips the Notice, which he signed indicating no confidential business information had been provided (Attachment 3). I also provided Mr. Phillips a Notice of Preliminary Findings (NOPF) (Attachment 4), which he signed to acknowledge receipt. A map of the facility obtained during the CEI is included in Attachment 5, and a Google Earth aerial photograph of the facility is included as Attachment 6. The 11 photographs taken during the CEI are included in Attachment 7, of which nine are discussed in this report.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

Donaldson has been operating at its current location since approximately 1965. The facility currently employs approximately 280 personnel who work one of three 8-hour shifts Monday through Friday. The facility consists of a single building with approximately 170,000 square feet under roof.

Donaldson manufactures air filters for large trucks and agriculture and construction equipment. Metal filter pieces are cut, pressed, and cleaned with aqueous solutions and drawing fluid. The drawing fluid consists of an oil that is sometimes mixed with petroleum distillates, which act as volatilizing agents. The facility refers to waste drawing fluid as polymer waste. Polymer waste is considered hazardous waste by the facility.

The interiors of the air filters are constructed of folded paper and polyurethane foam. The entire assemblage is glued together, and part labels are printed directly on the filters. Excess flammable waste adhesive, waste printing ink, and waste pad printer wipes are considered hazardous waste by the facility.

Maintenance activities at the facility generate spent aerosol cans, which are punctured and drained prior to recycling the cans as scrap metal. Aerosol can residue drained from the punctured cans is considered hazardous waste by the facility. Maintenance activities also generate waste batteries and mercury-containing equipment, which are managed as universal

waste according to Title 40 *Code of Federal Regulations* (40 CFR) Part 273. According to Mr. Phillips, universal waste lamps are not generated as the facility converted all lighting to light-emitting diode (LED) lighting in 2021. Used oil and used oil filters generated during equipment maintenance are managed as used oil according to 40 CFR Part 279. The facility also generates solvent-contaminated wipes, which are considered exempt from the definition of solid waste according to 40 CFR 261.4(a)(26). General trash is considered nonhazardous by the facility.

Donaldson was last inspected by an EPA contractor on February 25, 2020, with the following preliminary findings.

- Failure to label waste lamps accumulation container with the words “universal waste lamps,” “waste lamps,” or “used lamps,” as required by 40 CFR 273.14(e)
- Failure to conduct annual hazardous waste and Contingency Plan training as required by 40 CFR 262.17(a)(7)(iii)

The above preliminary findings were not repeated during this inspection.

2. RCRA Status

Donaldson is identified as a large quantity generator (LQG) of hazardous waste on the Verification Report provided by EPA (Attachment 1), generating more than 1,000 kilograms (kg) or 2,200 pounds of hazardous waste per month. Based on my review of the facility’s manifests generated over the last three years, the 2023 Biennial Report (Attachment 8) and information provided by Mr. Phillips, I concluded that the facility generates approximately 8,001 pounds (3,637 kg) of polymer waste per month alone. Therefore, I inspected the facility as a LQG of hazardous waste.

Universal wastes are shipped off site for recycling approximately every six months. Based on the quantities of universal waste batteries and mercury-containing equipment accumulated onsite between shipments, I inspected Donaldson as a small quantity handler (SQH) of universal waste (accumulating less than 5,000 kilograms [11,000 pounds] of universal waste at any time). I also inspected Donaldson as a used oil generator

The facility operates two less-than-90-day hazardous waste container accumulation areas (HWCAAs). The primary HWCAA is on the south side of the facility. The second is on the north side of the facility (Attachment 5). During my inspection, I observed nine of the 11 hazardous waste satellite accumulation areas (SAAs) in the manufacturing and maintenance areas.

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. Messrs. Phillips and O’Donnell accompanied me throughout the CEI.

Polymer waste is waste drawing fluid, which consists of oil that is sometimes mixed with petroleum distillates. The resulting mixture of oil and volatilizing agents creates hazardous waste drawing fluid (also known as polymer waste). Based on the 2023 Biennial Report (Attachment 8, page 4, Generation and Management [GM] 3), the facility generates approximately 8,000 pounds (3,629 kg) of polymer waste per month. The facility considers polymer waste to be characteristic (D001) hazardous waste based on process and product knowledge. A copy of the waste profile for polymer waste is included as Attachment 9. Based on the profile, it appears that the waste determination is adequate.

Polymer waste is accumulated in 55-gallon hazardous waste accumulation containers (HWACs) upon generation and transferred to a HWCAA. The waste is transported to Veolia Environmental in Menomonee Falls, Wisconsin, for bulking/offsite transfer.

During the CEI, I observed eleven 55-gallon HWACs of polymer waste in the South HWCAA and two HWACs of polymer waste in the North HWCAA. Due to health and safety concerns, the facility does not allow photographs to be taken in the HWCAAs. All HWACs were structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and dated. The oldest accumulation start date was May 15, 2024, for the South HWCAA and June 1, 2024, for the North HWCAA. I did not observe any deficiencies related to polymer waste.

Flammable waste adhesive consists of adhesive that is off-specification due to age or excess adhesive that remains in product containers. Flammable waste adhesive is considered characteristic (D001) hazardous waste based on product and process knowledge. Based on the 2023 Biennial Report (Attachment 8, page 3, GM 1), the facility generates approximately 4 pounds (2 kg) of flammable waste adhesive per month. The waste is accumulated in 5-gallon satellite accumulation containers (SAC) upon generation. Flammable waste adhesive is transported to Veolia Environmental Services in Menomonee Falls, Wisconsin, for bulking/offsite transfer.

During the CEI, I observed two SACs of flammable waste adhesive at Bays H-8 and H-7 (Attachment 7, Photographs 9 and 10). The two SACs were structurally sound, near the point of generation, under control of the operator, labeled with the words “hazardous waste” and an indication of the nature of the hazard, closed, held approximately 2 to 3 gallons of flammable waste adhesive each. I did not observe any deficiencies related to flammable waste adhesive.

Aerosol cans are generated during maintenance of facility equipment and buildings. When an operator empties an aerosol can, they immediately take it to the SAC in the South HWCAA to be punctured and drained. The punctured can is recycled as scrap metal. Aerosol residue drained from the punctured can is accumulated in a 55-gallon SAC beneath the puncturing unit. The facility considers aerosol can residue to be characteristic (D001, D035, D039, D040) hazardous waste based on product and process knowledge. The facility generates less than 1 pound of residue per month. The waste has not yet been transported off site for disposal.

During the CEI, I observed the 55-gallon SAC of aerosol can residue in the South HWCAA. Due to health and safety concerns, the facility does not allow photographs to be taken in the

HWCAAs. The SAC was structurally sound, near the point of generation, under control of the operator, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and closed. I noted no deficiencies with management of aerosol cans or aerosol can residue during the CEI.

Waste printing ink is generated during the process of printing model numbers on the filters. The facility uses methyl ethyl ketone (MEK) to clean printing equipment. Based on the 2023 Biennial Report (Attachment 8, page 3, GM 2), the facility generates approximately 46 pounds (21 kg) of waste printing ink per month. The facility considers waste printing ink to be characteristic and listed (D001, D007, D035, F003, and F005) hazardous waste based on process and product knowledge. A copy of the waste profile for waste printing ink is included as Attachment 10. Based on the profile, the hazardous waste determination appears to be adequate.

Waste printing ink is accumulated in 55-gallon SACs, and full SACs are transferred to a HWCAA. The waste is transported to Veolia Environmental Services in Menomonee Falls, Wisconsin, for fuel blending.

During the CEI, I observed a 55-gallon HWAC of waste printing ink in the South HWCAA. Due to health and safety concerns, the facility does not allow photographs to be taken in the HWCAAs. The HWAC was structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and dated March 20, 2024. I noted no deficiencies with management of waste printing ink during the CEI.

Waste pad printer wipes are generated during the process of cleaning the printer heads. MEK is applied to wipes for cleaning. Waste pad printer wipes are considered characteristic and listed (D035 and F005) hazardous waste based on product and process knowledge. Based on the 2023 Biennial Report (Attachment 8, page 4, GM 4), the facility generates approximately 25 pounds (11 kg) of waste pad printer wipes per month. Waste pad printer wipes are collected in 5-gallon SACs upon generation, and full SACs are transferred to a HWCAA for consolidation. The waste is transported to Veolia Environmental in Menomonee Falls, Wisconsin, for bulking/offsite transfer.

During the CEI, I observed a 5-gallon SAC of waste pad printer wipes at Bay E-11 (Attachment 7, Photograph 1). I observed similar 5-gallon SACs at Bays I-12, J-15, G-10, G-11, E-4, and E-11. All SACs were structurally sound, near the point of generation, under control of the operator, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and closed.

I also observed a 55-gallon HWAC of waste pad printer wipes in the South HWCAA. Due to health and safety concerns, the facility does not allow photographs to be taken in the HWCAAs. The HWAC was structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and dated March 20, 2024. I noted no deficiencies with management of waste pad printer wipes during the CEI.

Solvent-contaminated wipes are generated during maintenance activities at various locations (such as Bays C-11, E-8, E-11, F-11, and G-8), with a container at each location. The facility

considers the wipes exempt from the definition of solid waste per 40 CFR 261.4(a)(26). The containers are emptied by an operator once per week, so no wipes remain at the facility for longer than 180 days. Upon emptying the container, the operator verifies that there are no free liquids in the container. The wipes are accumulated in a screen-bottomed drum to verify that there are no free liquids in the container. Solvent-contaminated wipes are consolidated and transported to City Laundry in Oelwein, Iowa, for laundering and are returned for reuse.

During the CEI, I observed a 5-gallon container of solvent-contaminated wipes at Bay G-8 (Attachment 7, Photograph 2). The container was closed, labeled with the words “excluded solvent-contaminated wipes,” and held no free liquid. I did not observe any deficiencies related to solvent-contaminated wipes during the CEI.

Waste batteries are generated by maintenance personnel replacing spent batteries in equipment. Donaldson manages waste batteries as universal waste according to provisions of 40 CFR Part 273. Waste batteries are accumulated in universal waste accumulation containers in the receiving room. The facility generates approximately 42 pounds of waste batteries per month (interview, Mr. Phillips). The waste is collected by Veolia and transported to Veolia Environmental Services in Port Washington, Wisconsin, for recycling.

During the CEI, I observed a 2-gallon universal waste batteries container in the receiving room (Attachment 7, Photograph 5). The container was labeled with the words “universal waste batteries,” held approximately 15 alkaline batteries, and was dated May 20, 2024. I noted no deficiencies with management of waste batteries during the CEI.

Used oil and absorbents are generated by maintenance of equipment and are managed as used oil according to 40 CFR Part 279. The facility generates approximately 50 pounds of used oil per month. Used oil is accumulated in 55-gallon containers in the reclaim area. The waste is transported to Tradebe Treatment and Recycling in East Chicago, Indiana, for use as fuel.

During the visual inspection, I observed a 55-gallon used oil storage container in the reclaim area (Attachment 7, Photograph 3). The container was in good condition, with no apparent leaks or damage, held approximately 15 gallons of used oil, and was labeled with the words “used oil.” I did not observe any deficiencies related to management of used oil.

Used oil filters are generated from maintenance of equipment and are managed as used oil according to 40 CFR 279. The facility generates approximately 10 used oil filters a month. Used oil filters are not punctured, crushed, or shredded upon generation. They are accumulated in a 55-gallon container in the reclaim area. Used oil filters are transported to Tradebe Treatment and Recycling in East Chicago, Indiana, for use as fuel.

During the visual inspection, I observed a 55-gallon container of used oil filters in the reclaim area (Attachment 7, Photograph 4). The used oil filters container was in good condition, with no apparent leaks or damage, and held approximately 20 gallons of used oil filters. However, the container was labeled with the words “scrap oil filters.” The facility failed to label a used oil storage container with the words “used oil,” as required by 40 CFR 279.22(c)(1) (**NOPI No. 1**).

I provided compliance assistance regarding labeling of used oil storage containers. During the CEI, employees of Donaldson labeled the used oil filters storage container with the words “used oil” (Attachment 7, Photograph 11).

Mercury-containing equipment is generated when maintenance changes out switches that contain mercury. The facility generates approximately 5 to 6 mercury containing switches per year. Donaldson manages waste mercury-containing equipment as universal waste according to provisions of 40 CFR Part 273. Waste mercury-containing equipment is accumulated in universal waste accumulation containers in the receiving room. The waste is collected by Veolia and transported to Veolia Environmental Services in Port Washington, Wisconsin, for recycling.

During the CEI, I observed a 2-gallon universal waste container of mercury-containing equipment in the receiving room (Attachment 7, Photograph 6). The 2-gallon container was closed, labeled with the words “universal waste mercury-containing equipment,” held two mercury-containing switches, and was dated February 15, 2024. I did not observe any deficiencies related to the management of mercury-containing equipment during the CEI.

General trash consists of nonhazardous production wastes, packaging wastes, and general office-type refuse. General trash is considered nonhazardous and is accumulated in roll-off containers outside the facility. General trash is collected for disposal by Hawkeye Waste for landfilling. 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

Donaldson maintains two HWCAAs; one is situated along the South wall of the building, and the other one is situated along the North wall of the building (Attachment 5). At the time of the CEI, in the South HWCAA, I observed thirteen 55-gallon HWACs in the South HWCAA and two 55-gallon HWACs in the North HWCAA. The oldest accumulation start date for any HWAC was March 20, 2024.

According to Mr. Phillips, both HWCAAs are inspected weekly, and a log is updated electronically for each inspection. I reviewed three years of electronic inspection logs and verified that the inspections were conducted on a weekly basis. I did not observe any gaps of longer than one week in the inspection logs. Page 1 of 16 of the inspection log for the inspection conducted on May 29, 2024, is included as Attachment 11. I asked Mr. Phillips how someone would summon emergency assistance in the HWCAA. He stated that all of the workers that handle hazardous waste carry two-way radios. I noted no deficiencies with management of the HWCAAs.

6. Manifests and Biennial Report

Donaldson generated uniform hazardous waste manifests for 45 hazardous waste shipments from the period of June 3, 2021, to June 3, 2024. During the CEI, I reviewed manifests and LDR notifications for five shipments in 2021, five in 2022, five in 2023, and seven in 2024. Copies of the manifests for shipments dated January 18, 2022, and February 8, 2022, are included as Attachment 12 as examples.

In reviewing the e-manifest system records for Donaldson, I observed that there were no shipments listed between November 22, 2021, and June 15, 2022. I asked Mr. Phillips if the facility generated any hazardous waste during that time period. He stated that the facility changed disposal companies during that time period, from Univar Solutions to Veolia Environmental Services. I asked Mr. Phillips if the facility had paper copies of the manifest generated during that time. He confirmed that the facility had paper copies. Attachment 12 includes two uniform hazardous waste manifests not listed in the e-manifest system.

The facility submitted its 2023 Hazardous Waste Biennial Report on February 26, 2024 (Attachment 8). I noted no deficiencies during my review of manifests, LDR notifications, and the 2023 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. Phillips, Donaldson is the subject of a regular inspection by the Cresco Fire Department hazardous materials team. He explained the fire department is shown the layout of the facility, the location of the hazardous waste HWCAA, and other facility features during inspections.

The facility's contingency plan was last updated February 26, 2024. I reviewed the contingency plan against the content requirements of 40 CFR 262.261. I noted 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. Ron Bethany (Plant Manager), and the alternate emergency coordinator, Mr. Phillips, as required by 40 CFR 262.17(a)(6) referencing 262.261(d). A copy of the contingency plan contact information is included as Attachment 13.

The contingency plan also included a quick reference guide, as required by 40 CFR 262.17(a)(6) referencing 262.262(b). I noted no deficiencies with the facility's emergency preparedness, prevention, and procedures during the CEI, including content of the contingency plan and quick reference guide.

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. Phillips 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. Phillips who conducts the training. He stated that he conducts all training in person. I reviewed the training records for the last three years for Messrs. Bethany, Phillips and Mr. Kent Stille (production worker who signs manifest). Copies of the 2023 and 2024 training records for Messrs. Bethany, Phillips and Mr. Kent Stille are included in Attachment 14 as examples. Messrs. Bethany and Phillips have not yet taken the training in 2024.

I reviewed the written job descriptions for Messrs. Phillips, Stille and O'Donnell and noted that they appeared to meet requirements of 40 CFR 262.17(a)(7)(iv). A copy of the job description for Environmental Coordinator is included as Attachment 15.

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. Donaldson is not subject to the Subpart AA regulations because the facility does not have any of the process vents listed above.

If a LQG has equipment that contains or contacts hazardous waste composed of 10 percent or greater organics by weight, the facility is subject to Subpart BB standards for inspection and monitoring of the equipment. Donaldson 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 HWACs. During the CEI, I determined that Donaldson meets the Subpart CC requirements for containers by using Container Level 1 controls (HWACs 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.

9. Summary of Preliminary Findings

In summary, as part of the CEI, I made the following preliminary findings.

- Failure to label a used oil filters storage container with the words “used oil” as required by 40 CFR 279.22(c)(1) (**NOPF No. 1**).

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

Clifford A.
Nelles

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A. Nelles
Date: 2024.07.15
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Clifford A. Nelles, Inspector
CLAENE Group

AMBER WHISNANT

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

Attachments:

1. Notification/Acknowledgement Verification Report (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 11 Photographs) (8 pages)
8. Copy of 2023 Biennial Report (5 pages)
9. Copy of Waste Profile for Polymer Waste (3 pages)
10. Copy of Waste Profile for Waste Printing Ink (3 pages)
11. Copy of Inspection Log (Page 1 of 16) for May 29, 2024 (1 page)
12. Copies of Manifests for Shipments Dated January 18, 2022, and February 8, 2022 (2 pages)
13. Copy of Emergency Coordinator Contact List from Contingency Plan (1 page)
14. Copy of Training Records for Eric Phillips, Ron Bethany, and Kent Stille (2 pages)
15. Copy of Job Description for Environmental Coordinator (1 page)