

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

Plasti-Paint Inc.
316 Industrial St.
De Witt, IA 52742
(563) 659-1785

EPA ID Number: IAR000008300

On

March 24, 2021

By

Eastern Research Group, Inc.

For

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

1.0 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, Eastern Research Group, Inc. (ERG) conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Plasti-Paint Inc. (Plasti-Paint) in De Witt, Iowa on March 24, 2021. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. Throughout the CEI, data and information were collected to determine compliance with the applicable regulatory and statutory requirements. The inspection report and attachments present the results of the CEI.

2.0 PARTICIPANTS

Plasti-Paint Inc.:
Rod Phillips, Plant Manager
Kyle Parkinson, Paint Manager
John Schnack, Maintenance Manager

EPA Representative, ERG:
Janosh Wolters, Energy Engineer (Lead Inspector)
George Wieber, Chemical Engineer

3.0 INSPECTION PRECEDURES

Due to the COVID-19 pandemic, I contacted the facility via telephone and spoke with Mr. Phillips approximately one week prior to the inspection. We discussed facility specific safety protocols to ensure the safety of all personnel involved during the inspection and I informed him when I would arrive at the facility to perform the inspection. After arriving announced at Plasti-Paint at approximately 07:45, I performed a drive-by of the facility and took a photograph before beginning the inspection and did not note any areas of concern. Mr. Wieber and I then met Mr. Phillips at the entrance to the office area. Mr. Phillips then led us to his office to begin the opening conference at approximately 08:00. I initiated the opening conference with Mr. Phillips present as the Plasti-Paint representative. I presented him with my inspector credentials and business card, as well as the business card of the EPA Task Order Contracting Officer Representative, Mr. Trevor Urban. I then presented a copy of RCRA Section 3007(a), which contains EPA's inspection authority. I explained my need to collect accurate information and presented him with a copy of Title 18 U.S. Code, Sections 1001 and 1002. I then presented Mr. Phillips with a copy of the *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections* and reviewed Plasti-Paint's confidentiality rights. I informed Mr. Phillips that I would provide a *Confidentiality Notice* at the end of this inspection.

The inspection consisted of 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. Mr. Phillips provided me with a facility layout (see Attachment 1) and explained facility operations and locations of the hazardous waste generation and management areas. I conducted an in-depth visual inspection of each of these areas.

Before beginning the visual inspection, Mr. Phillips introduced us to Mr. Parkinson and Mr. Schnack. Mr. Phillips, Mr. Parkinson, and Mr. Schnack accompanied Mr. Wieber and me throughout the entire visual inspection. During the visual inspection of the facility, Mr. Phillips guided me throughout the facility in order to conduct thorough evaluations of the facility's satellite accumulation areas (SAAs) and central accumulation area (CAA). At the time of the inspection, the facility was operating one SAA and one CAA. The facility also handles universal waste in a designated area on site, which was also visually inspected. Plasti-Paint uses a parts washer with the same solvent used to flush paint lines, and I observed the parts washer during the course of the inspection. The facility generates all hazardous waste from painting operations. Mr. Wieber and I conducted an in-depth visual inspection of the paint booths.

Three photographs were collected as inspection documentation and are shown in Attachments 2 and 3. Information collected during the inspection is documented on the *EPA Inspection Checklist* (see Attachment 4). I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.01D), unless noted differently. At the conclusion of the inspection, I provided Mr. Phillips with a *Confidentiality Notice, Receipt for Documents and*

Samples, and Notice of Preliminary Findings which he signed as acknowledgement of receipt (see Attachments 5, 6, and 7, respectively). No confidentiality claims were made by Plasti-Paint.

The following inspection documents and compliance assistance handouts were left with Plasti-Paint:

RCRA Section 3007(a)

Title 18 U.S. Code, Sections 1001 and 1002

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

Confidentiality Notice (Top page of the completed carbonless transfer set)

Receipt of Documents and Samples (Top page of the completed carbonless transfer set)

NOPF (Top page of the completed carbonless transfer set)

Instructions for Responding to a NOPF

Security Awareness

Commercial Motor Vehicle Transportation

Security Planning

EPA E-Manifest Fact Sheet U.S.

EPA Small Business Resources

U.S. EPA Publication, Managing Your Hazardous Waste

U.S. EPA Publication, Managing Used Oil-Advice for Small Businesses

PowerPoint Presentation, 2013 Solvent Wipes Final Rule

Pollution Engineering Article, 10 Common Questions for Waste Generators

Iowa Department of Natural Resources (IDNR) Waste Exchange Folder and P2 Brochures

IDNR Management of Fluorescent Lamps for Businesses Information Sheets

IDNR Aerosol Can Disposal for Businesses Information Sheet

University of Northern Iowa Waste Reduction Center Information Card Solvent-Contaminated Solvent-Contaminated Wipes Final Rule Summary Chart

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

Plasti-Paint began operating in 2000 and currently employs approximately 35 people. The facility operates five days per week with one 10-hour shift. The facility has a footprint of approximately 60,000 square feet. Plasti-Paint paints pre-manufactured parts for the agricultural and automotive industry. The only major manufacturing or processing operations that generate waste streams include pressure washing, sanding, buffing, and painting pre-manufactured parts. The following waste streams are produced: waste paint related materials, waste paint solids, waste paint booth filters, waste wash water, universal waste, used aerosol cans, and general trash.

4.2 RCRA Status

According to the *Hazardous Waste Site Info Verification Report for Inspector* (see Attachment 8), Plasti-Paint notified as a federal large quantity generator (LQG) of D001, D035, F003, and F005 hazardous waste. I asked Mr. Phillips to review the *Hazardous Waste Site Info Verification*

Report for Inspector, which I provided prior to records review and visual inspection of the waste generation areas. He requested a correction in the spelling of his first name. After reviewing the records and walking through the facility, I determined that the facility is operating as a LQG of D001, D035, F003, and F005 hazardous waste, a generator of used oil, and a SQH of universal waste. Plasti-Paint generates more than 1,000 kilograms of hazardous waste monthly based on a review of facility records, a visual inspection of process and waste management areas, and interviewing personnel.

Plasti-Paint was previously inspected by an EPA contractor on September 22, 2016. The inspection led to a notice of preliminary findings (NOPFs). The findings included: failure to date or track universal waste lamps, failure to keep hazardous waste accumulation container closed, and failure to have adequate spill control equipment in a CAA. In addition, failure to have a device capable of summoning emergency assistance at a CAA and failure to include description of arrangements with local emergency response agencies in the contingency plan. I observed a repeat finding of a failure to include description of arrangements made with local emergency response agencies in the contingency plan.

4.3 Facility Waste Streams and Management

A Waste Stream and Waste Handling Table for Plasti-Paint is presented below. The table describes waste streams generated, generation process/rates, hazardous waste determinations, and on-site/off-site management.

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#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
1	Waste Paint Related Materials (Waste Profile included as Attachment 9)	Painting operations	D001, D035, F003, F005 (based on process knowledge and knowledge of the product)	45, 55-gallon containers per month	55-gallon container in SAA and transferred to CAA.	Clean Earth Specialty Waste Solutions in Blaine, MN (MNS000110924) to Systech Environmental Corporation in Fredonia, KS (KSD980633259) or Petro Chem Processing Group in Detroit, MI (MID044176113)
2	Waste Paint Related Solids	Dried solids such as liner from original packaging of paint and absorbent pads	Nonhazardous (based on process knowledge and knowledge of the product)	100 pounds per year	8-yard dumpster	Republic Services in Davenport, IA
3	Waste Paint Related Solids (cleanup of spilled paint)	Cleanup materials from spilled paint that include paint/solvent-soaked absorbent pads, PPE, and solvent wipes	D001, D035, F003, F005 (based on process knowledge and knowledge of the product)	68 pounds (first time in over one year)	55-gallon container	Clean Earth Specialty Waste Solutions in Blaine, MN (MNS000110924) to Systech Environmental Corporation in Fredonia, KS (KSD980633259) or Petro Chem Processing Group in Detroit, MI (MID044176113)

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
4	Waste Paint Booth Filters	Changeout of paint booth filters (on an as needed basis)	Nonhazardous (analytical results included as Attachment 10)	Unknown (added to general trash)	8-yard dumpster	Republic Services in Davenport, IA
5	Waste Wash Water	Facility maintenance and operations	Nonhazardous (based on process knowledge and knowledge of the product)	Five stage washing process (cleaning parts with power washer before painting)	175,000 gallons per month	Discharged to sanitary sewer to the City of DeWitt's publicly owned treatment works (POTW) (Notification letter included as Attachment 11)
6	Universal Waste (Spent Lamps)	Facility maintenance	Nonhazardous (managed as universal waste)	10 lamps per year	4-ft cardboard container	Shipped to Veolia ES Technical Solutions in Port Washington, WI (WID988566543)
7	Universal Waste (Used Batteries)	Facility maintenance	Nonhazardous (managed as universal waste)	Less than 5-gallon container per year	5-gallon container	Shipped to Veolia ES Technical Solutions in Port Washington, WI (WID988566543)
8	Used Oil	Facility maintenance	Nonhazardous (managed as used oil under 40 CFR 279)	Less than 55 gallons per year	55-gallon containers	Altorfer Inc. in Cedar Rapids (IAD981728942) (Invoice included as Attachment 12)

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
9	Used Aerosol Cans (RCRA Empty)	Facility maintenance	Nonhazardous (based on process knowledge and knowledge of the product)	36 aerosol cans per year	Used until emptied and added to general trash	Republic Services in Davenport, IA
10	General Trash	Facility operations	Nonhazardous (based on process knowledge and knowledge of the product)	Two 8-yard dumpsters picked up twice per week	Two 8-yard dumpsters	Republic Services in Davenport, IA

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4.4 Less-Than-90-Day Hazardous Waste Accumulation Area

Plasti-Paint has one Less-Than-90-Day CAA on site, which is located in the Paint Locker Room as shown on the facility layout (see Attachment 1). I visually inspected the CAA at approximately 09:45. The CAA was located inside the Paint Locker Room that contained the CAA and new paint containers, solvent containers, and refurbished/new empty containers. I observed twelve 55-gallon containers of paint related hazardous waste in the CAA (see Attachment 3, Photo 3). The earliest start accumulation date for containers present in the CAA was March 8, 2021. This is within 90 days from the time of the inspection. The facility only primarily generates one hazardous waste stream and Mr. Parkinson stated that hazardous waste drums are usually up once per week.

The Less-Than-90-Day CAA containers were in good condition, closed, labeled with the indication of the nature of the hazard, and labeled with the words “Hazardous Waste”. I observed adequate aisle space to allow for container inspections and access in the event of a spill. The floor of the Paint Locker Room was sloped towards a non-draining sump that could be pumped out in the event of a spill. I observed a fire extinguisher, spill control equipment, and related safety equipment within the CAA. Operators handling hazardous waste carry radios while on site, which serve as a communication system in case of emergencies. Each facility representative handling hazardous waste has a radio, and the facility operates on a single channel for all communication. Inspection logs for the CAA are provided in Attachment 13. I did not note any issues or findings at the CAA during the inspection.

4.5 Satellite Accumulation Areas

I observed one SAA at Plasti-Paint while on site. The facility had one 55-gallon container accumulating waste paint related material. The painting operations on site generate waste paint throughout each paint cycle. In addition, MEK is used to flush paint lines and generates spent solvent waste. The SAA is located outside the CAA, next to the facility’s paint booths. More information on the facility’s painting operations and waste generated from these operations is provided in Section 4.6 of this report. The hazardous waste accumulation container observed was in good condition, closed, labeled with the indication of the nature of the hazard, and labeled with the words “Hazardous Waste”.

I reviewed the management of the SAA at the facility and no issues or findings were noted.

4.6 Painting Operations

At the time of the inspection, the facility was operating four paint booths. Before painting operations are completed, the facility receives premanufactured parts that are cleaned in a five-stage rinse process. The facility completes pressure water rinses and generates waste wash water from the process. The waste wash water is discharged directly to the sanitary sewer system without collection, storage, or treatment prior to discharge. The discharge flows directly to the City of DeWitt’s POTW. Approximately 175,000 gallons per month is discharged to the POTW as shown in the notification report provided in Attachment 11. I asked Mr. Phillips if any additives such as solvent are used in the process. Mr. Phillips stated the facility only uses

pressurized water to clean off any dirt and debris that could have settled on the pre-manufactured parts prior to their arrival to the facility. The pre-manufactured parts are then dried on an assembly line and are transported to paint booths for painting operations. Throughout the painting operation, waste paint is generated. The waste accumulated during painting operations is contained in a 5-gallon container.

I observed painting operations as part of the visual inspection. I asked Mr. Parkinson how the 5-gallon containers are managed when painting operations are not operating. Mr. Parkinson stated that once the paint cycle has ended, the paint operator on duty has been trained to immediately empty the 5-gallon container into the 55-gallon container in the SAA. Additionally, when needed, paint lines are flushed with MEK and the facility accumulates the spent solvent waste in 5-gallon containers. Immediately thereafter, the facility transfers the spent solvent into the 55-gallon SAA container. During the visual inspection, I observed the 5-gallon containers being filled during painting operations. I observed one facility operator empty a 5-gallon container immediately after a paint cycle had ended and painting lines were flushed. The container was immediately brought to the 55-gallon container in the SAA and emptied into the 55-gallon container. The 5-gallon containers were not labeled. The waste generated in the painting operations and the spent solvent flush is all considered waste paint related material. The waste profile for the waste stream is provided in Attachment 9.

I asked Mr. Parkinson how the facility managed paint booth filter waste. Mr. Parkinson stated the paint booth filters are replaced, as needed, and are completely dry when disposed of in the facility's general trash. I asked how the facility determined the waste paint booth filters were nonhazardous. Mr. Parkinson stated RTI Laboratories, Inc. completed a TCLP analysis on the paint booth filters. The analytical report and results are provided in Attachment 10.

I asked Mr. Parkinson if any solvent contaminated rags are generated as part of the facility's painting operation. Mr. Parkinson the facility does not generate solvent contaminated rags. Mr. Parkinson stated the only other waste that is generated due to painting operations, is a minimal amount of waste paint related solids. Mr. Parkinson stated this waste stream is generated primarily from absorbent pads. The pads are placed within the painting operation and are completely dry when added to general trash. Mr. Parkinson estimated less than 100 pounds of waste paint related solids are generated each year.

I asked Mr. Parkinson if the facility had any solid waste paint related material that would be considered hazardous waste. Mr. Parkinson stated the facility only generates solid waste paint related material that is hazardous due to cleanups. I asked Mr. Parkinson to explain what he meant by cleanups. Mr. Parkinson stated that cleanups may occur due to spilled paint. Mr. Parkinson stated the cleanups would be minimal and consist of paint/solvent-soaked absorbent pads, PPE, and solvent wipes that would be generated only because of cleanup operations. Mr. Parkinson stated the facility sent off one drum totaling 68 pounds of waste paint related solids as shown on one of the manifests taken as an example.

4.7 Parts Washer

The facility owns one parts washer located in the paint mixing room as shown on the facility layout (see Attachment 1). I asked Mr. Parkinson how the parts washer was used. Mr. Parkinson stated the parts washer has never been used to clean any parts on site. Mr. Parkinson stated that Plasti-Paint uses the parts washer to clean any 5-gallon containers assisting in the paint mixing process. Mr. Parkinson stated MEK is used as the cleaning solvent in the parts washer. The parts washer waste solvent is then drained into a 5-gallon container at the bottom of the parts washer. Mr. Parkinson stated the parts washer is only used occasionally. The 5-gallon container is disconnected from the parts washer, Plasti-Paint immediately transfers it to the CAA and manages it as hazardous waste paint related material.

4.8 Maintenance Area

Plasti-Paint manages universal waste in the maintenance area located in the in the near the northeast corner of the warehouse as shown in the facility layout (see Attachment 1). At the time of the inspection, one four-foot cardboard box containing universal waste lamps was observed (see Attachment 3, Photo 2). The box was labeled as universal waste lamps, closed, and dated with the start accumulation date. The accumulation start date observed on the universal waste container was October 10, 2020. I asked Mr. Schnack where the facility's universal waste batteries were stored. Mr. Schnack stated the facility was not currently accumulating any waste batteries since the last time the waste was picked up. I asked Mr. Schnack when the last time the facility sent out used batteries. Mr. Schnack stated the facility does not generate used batteries often and he could not recall the last time waste batteries were picked up. Additionally, Mr. Schnack stated once the facility generates the next waste battery, Plasti-Paint will accumulate the batteries in a 5-gallon container that would be labeled and dated with an accumulation start date. Throughout the visual inspection, I did not observe any waste batteries. I asked Mr. Schnack if any used oil is generated and stored in the maintenance area. Mr. Schnack stated the facility only generates used oil when forklift maintenance is completed. The facility contracts these services out to an independent company. Mr. Schnack stated once the used oil is generated, the used oil is then taken off site by the same company completing the forklift maintenance. The company conducting the maintenance is Altofer Inc. and an invoice for the last fork-lift maintenance completed is provided in Attachment 12. Additionally, I asked Mr. Schnack if aerosol cans are used on site. Mr. Schnack stated the facility uses a lubricant that is sprayed onto the assembly line gears. Mr., Schnack stated the facility uses the aerosol can until it is completely empty, and it is then added to the general trash.

I did not note any issues or findings concerning used oil, empty aerosol cans, spent parts washer solvent, or universal waste accumulation within the maintenance area.

4.9 Other Regulatory Requirements

Preparedness, Prevention, and Emergency Requirements - Safety and emergency equipment were present and in satisfactory condition in areas throughout the facility, including the CAA (as

noted in Section 4.4 of this report). I asked Mr. Phillips, Mr. Parkinson, and Mr. Schnack for documentation showing the description of arrangement's made with local emergency agencies. The facility could not provide documentation in regard to the description of arrangements made with local emergency agencies.

NOPF 1 – Failure to provide description of arrangements made with local emergency agencies [40 CFR 262.256(a)].

Contingency Planning Requirements - The contingency plan was on file in a binder and was reviewed while on site. The contingency plan is provided in Attachment 14. I observed Mr. Phillips was listed as an alternative emergency coordinator upon reviewing the contingency plan. The contingency plan was dated "October 2016". Mr. Phillips stated in earlier conversations that he has been the plant manager for approximately one year. I asked Mr. Phillips if he worked in another position prior to becoming plant manager. Mr. Phillips stated the facility hired him as the plant manager, approximately one year ago. I asked Mr. Phillips if the facility updated the alternate emergency contact in the contingency plan but did not update the date listed on the contingency plan to reflect a revision of the plan. Mr. Phillips stated the facility must have updated the emergency contact information and did not update the date listed on the contingency plan to reflect that a revision occurred. I explained to Mr. Phillips that per 40 CFR § 262.262(a), the facility was required to prepare a quick reference guide due to the facility amending the contingency plan to include his name as an alternate emergency contact.

NOPF 2 – Failure to prepare a quick reference guide and submit to emergency response agencies [40 CFR 262.262(b)].

I reviewed the entire RCRA contingency plan, and no additional issues or findings were noted.

Personnel Training Requirements – Personnel are to be trained to perform hazardous waste duties, and new employees are to be trained within 6 months of start. The training, at a minimum, must be designed to ensure personnel at Plasti-Paint are able to manage hazardous waste relevant to the positions in which they are employed and respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including:

1. Procedures for using, inspecting, repairing, and replacing facility emergency equipment
2. Communications and alarm systems
3. Response to fires or explosions

Upon reviewing the hazardous waste training employees of Plasti-Paint receive, I determined the training to be sufficient. I asked Mr. Phillips for yearly records dating back to 2018 for completed trainings and attendance sheets for current employees managing hazardous wastes. Mr. Phillips provided training acknowledgement forms for trainings that occurred in 2017 and 2019 (see Attachment 15). Mr. Phillips stated he could not provide the training acknowledgement forms for 2018 or 2020. Mr. Parkinson stated the facility completed the training in 2018 and the form must have been misplaced. Additionally, Mr. Parkinson stated the facility did not complete training in 2020. Mr. Phillips stated the facility was directed by

corporate to adhere to strict COVID-19 safety protocols. Mr. Phillips and Mr. Parkinson stated that once the facility is approved to conduct large trainings again, the annual hazardous waste training would be conducted. Mr. Parkinson stated staff members that currently manage hazardous waste attended the 2019 annual training and are directly supervised by him. At the time of the inspection, the facility did not complete the annual hazardous waste refresher training in 2020.

NOPF 3 – Failure to provide an annual review of initial hazardous wastes training [40 CFR 262.17(a)(7)(iii)].

I reviewed the personnel training requirements, and no additional issues or findings were noted.

Manifest and Land Disposal Restriction (LDR) Requirements – Plasti-Paint maintained records of manifests on site at the time of inspection dating back three years. Mr. Wieber reviewed the manifests and did not observe any concerns. Due to the facility generating primarily one hazardous waste stream, every manifest reviewed consisted of mainly one waste stream documented. Besides a onetime shipment in over a year of hazardous waste solids, all manifests consisted of one hazardous waste stream. Two manifests and an LDR form are included in Attachment 16 as examples.

I reviewed all other manifest and LDR requirements and no issues or findings were noted.

5.0 SUMMARY OF FINDINGS

NOPF 1 – Failure to provide description of arrangements made with local emergency agencies [40 CFR 262.256(a)].

The facility representatives present during the inspection could not provide documentation regarding the description of arrangements made with local emergency agencies.

NOPF 2 – Failure to prepare a quick reference guide and submit to emergency response agencies [40 CFR 262.262(b)].

The facility revised the contingency plan within the last year in order to add Mr. Phillips as an alternate emergency coordinator. At that time, the facility did not prepare a quick reference guide.

NOPF 3 – Failure to provide an annual review of initial hazardous wastes training [40 CFR 262.17(a)(7)(iii)].

At the time of the inspection, Mr. Phillips stated he could not provide training acknowledgement forms for 2018 or 2020. Mr. Parkinson stated the facility completed the annual refresher training in 2018 and the form must have been misplaced. Additionally, Mr. Phillips and Mr. Parkinson stated the facility had not yet completed the 2020 annual refresher training due to concerns gathering in large groups because of the COVID-19 pandemic.

I observed no additional issues or findings during this inspection. However, further EPA review may add findings.

JANOSH WOLTERS
(Affiliate)
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WOLTERS (Affiliate)
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Janosh Wolters
Energy Engineer
Date: May 20, 2021

**AMBER
WHISNANT**
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Date: 2021.06.01 12:28:24
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Amber Whisnant
Section Chief
ECAD/CB/RCRA, EPA Region 7
Date: _____

Attachments

- 1) Attachment 1 – Facility Layout (1 page)
- 2) Attachment 2 – Plasti-Paint Photolog (1 page)
- 3) Attachment 3 – Plasti-Paint Photos (3 Photos, 4 pages)
- 4) Attachment 4 – EPA Inspection Checklist (26 pages)
- 5) Attachment 5 – Confidentiality Notice (1 page)
- 6) Attachment 6 – Receipt for Documents and Samples (1 page)
- 7) Attachment 7 – Notice of Preliminary Findings (1 page)
- 8) Attachment 8 – Hazardous Waste Site Info Verification Report for Inspector (1 page)
- 9) Attachment 9 - Waste Paint Related Material Waste Profile (1 page)
- 10) Attachment 10 - Analytical Data for Waste Paint Booth Filters (31 pages)
- 11) Attachment 11 - Wastewater Notification Letter (4 pages)
- 12) Attachment 12 - Forklift Invoice Used Oil (3 pages)
- 13) Attachment 13 - CAA Weekly Inspections (3 pages)
- 14) Attachment 14 - Contingency Plan (12 pages)
- 15) Attachment 15 - Training Records (2 pages)
- 16) Attachment 16 - Manifests (3 pages)

NOTICE OF PRELIMINARY FINDINGS

FACILITY NAME: Plasti-Part Inc.
ADDRESS: 316 Industrial St. De Witt, IA 52742
EPA ID NUMBER: IAR000008300 DATE: 03/24/2021

NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and making the determinations as to what violations may have occurred at your facility.

1. Failure to include description of arrangements with local emergency agencies, as appropriate. 40CFR 262.17(a)(6) → 262.26(a)
2. Failure to prepare a quick reference guide after revising contingency plan after May 30, 2017. 40CFR 262.17(a)(6) → 262.26(a)
3. Failure to refresh hazardous waste training annually. 40CFR 262.17(a)(7)(ii)
4. _____
5. _____
6. _____
7. _____

If you have any questions regarding these findings please contact

The undersigned person hereby acknowledges receipt of a copy of this document and has read the same.

PRINTED NAME: Rod A. Phillips TITLE: Plant Manager
SIGNATURE: Rod A. Phillips

This document was prepared by Janosh Walters