

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

KEYSTONE ELECTRICAL MANUFACTURING INC

2511 Bell Ave
Des Moines, Iowa 50321
906-776-3411

EPA ID Number: IAR000526996

On

February 27, 2024

By

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 (ECAD), I conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Keystone Electrical Manufacturing, located in Des Moines, Iowa, on February 27, 2024. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. During the inspection, I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. This inspection report and attachments present the results of the CEI.

2.0 PARTICIPANTS

Keystone Electrical Manufacturing:

- Christopher Gendron, EHS Director - via video conference call (6 years with company)
- Patrick Oberg, Manufacturing Engineer (2 years with company)
- Jeffery Conroy, Operations Manager (6 months with company)
- Chris List, Director of Quality Assurance - Systems Control (5 years with company)
- Jonathan Eike, Paint Lead (1 year with company)
- Joe Maize, Maintenance (5 months with company)

EPA:

- Mark Holcomb, Civil Investigator/Inspector (SEE)
- Amy Thompson, Inspector/Case Officer
- Koba Butkovich, Inspector/Case Officer

3.0 INSPECTION PROCEDURES

On February 27, 2024, we arrived unannounced at the facility's main entrance at about 0900 hours. Initially, we conducted a visual reconnaissance of the facility searching for areas of concern observable from the adjacent public roadways and parking lots. I identified no environmental issues or concerns during this preliminary examination. I entered the facility through the main entrance and was greeted at the front desk. I introduced myself and asked for the facility environmental health and safety (EHS) manager or hazardous waste contact. I was introduced to Mr. Jeffery Conroy, the Operations Manager. Mr. Conroy escorted us to an office/workroom area along with Mr. Patrick Oberg, the Manufacturing Engineer. Mr. Conroy told us the items of personal protective equipment required for our visual inspection at this facility were protective boots, eye protection, and hearing protection in some areas. Mr. Conroy stated that the primary contact for hazardous waste at this facility was Mr. Christopher Gendron, EHS Director, who was not available onsite that day.

At the opening conference, I presented my EPA ID and credentials to Messrs. Conroy and Oberg. I explained that my colleagues, Ms. Amy Thompson, and Mr. Koba Butkovich, would be assisting me in a training capacity. I next explained the purpose and procedures of the inspection. I then presented Messrs. Conroy and Oberg with a copy of RCRA Section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented them with a copy of Title 18 U.S. Code, Sections 1001 and 1002. They were made aware of their confidentiality rights, and I informed them that a Confidentiality Notice would be provided at the end of the inspection to make a confidentiality claim if they so desired. Messrs. Conroy and Oberg acted as the official facility representatives during the opening conference and visual inspection phases and then they were both replaced by Mr. Chris List, Director of Quality Assurance, and Mr. Gendron (via video conference) during the afternoon exit conference phase of the inspection.

The CEI consisted of a discussion of facility operations, waste generation, and waste management; a visual inspection of active waste generation and management areas; and a review of waste management records and documents. I conducted a visual inspection of the following areas:

- Dock
- Receiving
- Fabrication
- Paint Kitchen
- Paint Booth
- Outside North
- Wiring Area
- Universal Waste Batteries Area
- Occupational Health & Safety Office
- Cold Storage

See Attachment #1 for the aerial/map views and facility diagram. Document photocopies and photographs were collected as inspection documentation (see Attachments #1-12 and Photos 1-22). The photo log is included as Attachment #2. Information collected during the inspection is

documented on an Entry/Exit checklist, the hazardous waste compliance checklist, and in a notebook. I reviewed documents including the following: Safety Data Sheets (SDS), manifests, invoices, and permits (they stated that the emergency plan, job descriptions, and staff training were all in the process of being updated). I followed the inspection procedures detailed in the RCRA CEI Standard Operating Procedure 2321.01E, unless noted otherwise.

At the conclusion of the inspection, I summarized my findings and recommendations with Mr. List (in person) and Mr. Gendron (via video conference). I provided Mr. List with a Receipt for Documents (see Attachment #3), a Confidentiality Notice (see Attachment #4), and a Notice of Preliminary Findings (NOPF) (see Attachment #6), which he signed as acknowledgement of receipt. No claim of confidential business information was made by Mr. List. I provided inspection and compliance assistance documents to Mr. Gendron as an electronic PDF via email post-inspection, that included the following:

- *RCRA Section 3007(a) (EPA Handout)*
- *Title 18 U.S. Code, Sections 1001 and 1002 (EPA Handout)*
- *Confidentiality Notice (Top page of the completed carbonless transfer set)*
- *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA In Connection with Inspections (EPA Handout)*
- *Receipt for Documents and Samples (Top page of the completed carbonless transfer set)*
- *NOPF with Instructions for Responding on back of form (top page of the completed carbonless transfer set)*
- *Instructions for Responding to a NOPF (EPA Handout)*
- *U.S. EPA Small Business Resource Information Sheet (EPA Handout)*
- *Solvent-Contaminated Wipes Final Rule Chart (EPA Handout)*
- *Recycling Electronics (Iowa Department of Natural Resources - IDNR Handout)*
- *Lead-Based Paint Activities (IDNR Handout)*
- *Excluded Solvent-Contaminated Wipe Rule (IDNR Handout)*
- *Battery Recycling/Disposal (IDNR Handout)*
- *Management of Fluorescent Lamps for Businesses (IDNR Handout)*
- *Incompatible Chemicals (IDNR Handout)*
- *Universal Wastes Including Aerosol Cans (IDNR Handout)*
- *TCLP Waste Determination Testing (IDNR Handout)*
- *Industry Sector Notebooks (EPA Handout)*
- *Environmental Compliance Assistance Centers (EPA Handout)*
- *e-Manifest Fact Sheet (EPA Handout)*
- *RCRA Online A Quick Reference Guide (EPA Handout)*
- *Requirements for Used Oil Management Standards (EPA Handout)*
- *Emergency Response Program (EPA Handout)*
- *Commercial Motor Vehicle Transportation System Security & Safety*
- *Security Awareness (EPA Handout)*
- *Chemical Facility Anti-Terrorism Standards (Homeland Security Handout)*
- *Iowa Life/Changing Iowa Department of Economic Development – Iowa Environmental Guide for Business*
- *How to Register for RCRAInfo Industry Application for Iowa Facilities*

- *Episodic event processing*

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

Keystone Electrical Manufacturing is a manufacturer of electrical substation controls, relay panels, and turnkey substation control building solutions. Keystone Electrical Manufacturing was recently acquired by Hubbell, in December 2023, a \$3.7B publicly traded company based in Shelton, Connecticut. In July 2021, Keystone Electrical Manufacturing had also been acquired by and/or merged (they called it a sister company) with the company System Controls, located in Iron Mountain, Michigan, that was also acquired by Hubble in December 2023. Keystone Electrical Manufacturing has been in operation for at least 30 years. About twenty years ago they relocated to their current facility from a location a couple of miles away at 122 SW 16th Street, which was their location during their previous CEI on August 6, 1997. The facility constructs about 40 electrical panel units per month. This facility has 130 employees working two shifts Monday - Friday. The facility operates in one 54,000 square foot building. Mr. Conroy stated that the facility had no hazardous waste spills or significant activations of their emergency plan in the last several years. See Attachment #1 for the facility aerial map views and facility diagram.

Mr. Gendron (via conference phone call) stated that due to their recent acquisitions and mergers, the company management had requested an outside consultant to review their environmental, health, and safety (EHS) programs and make recommendations for improvements and standardization across their several companies. He stated that their consultant had just been hired about three weeks prior to our inspection but had already identified many areas for improvement. He stated that they were in the process of developing, updating, and rewriting many processes, protocols, and documents, including their job descriptions, emergency contingency plan, and quick reference guide. On April 25, 2024, I contacted Mr. Gendron by phone with additional questions and to ask about the status of the NOPF response. He stated that the facility had completed a majority of the updates and fixes mentioned in the NOPF and he was in the process of preparing a response to the NOPF. I sent him a copy of the updated NOPF list from this report.

4.2 RCRA Status

Keystone Electrical Manufacturing had been previously inspected for RCRA compliance on August 6, 1997 (with no reported findings). According to RCRAInfo, Keystone Electrical Manufacturing had most recently notified as a small quantity generator on February 3, 2022. I verified the facility address and the site contact information with Mr. Conroy and updated the EPA RCRA Notification Acknowledgement Verification Report (see Attachment #5) to indicate the primary contact's cell phone number. Based on the review of the past three years' uniform hazardous waste manifests, I initially determined that Keystone Electrical Manufacturing routinely generates D001, D035, F003 and F005 hazardous waste at the large quantity generator (LQG) level (an estimate of 3,400 pounds or 1,540 kg per month) and inspected the facility as a LQG (at the time of the inspection). I also inspected the facility as a small quantity handler of

universal waste lamps and a generator of used oil. *After the inspection completed, I further reviewed the facility's hazardous waste generator notifications, hazardous waste generation rates, and 2023-2024 uniform hazardous waste manifests. During this additional review, it was determined that the facility provided EPA with LQG notification on February 20, 2024 (seven days prior to the 2024 inspection – See attachment 13). From the additional review of the 2023 uniform hazardous waste manifests, it appears that the facility operated as a LQG during the months of February, March, June, July, September, and October. During these 2023 months, the facility did not appear to be following the LQG emergency preparedness/prevention and training requirements. During this additional review, I also determined that the facility appeared to operate as a SQG (220 pounds to 2,200 pounds of hazardous waste per month) during the 2024 calendar months of January, February, and March.*

4.3 Facility Waste Streams and Management

Mr. Conroy stated that the following waste streams are managed by Keystone Electrical Manufacturing:

Waste Paint Booth Air Filters - Keystone Electrical Manufacturing generates waste paint booth air filters in their Paint Booth during the manufacturing painting process. This waste has been determined to be D035, F003, and F005 based on process and product knowledge. Mr. Gendron stated the waste paint booth air filters have been determined to be hazardous due to a reported history of spontaneous combustion. He stated that they transfer the waste paint booth air filters into 55-gallon drums and add water to help protect them. On the uniform hazardous waste manifests, this waste stream is listed as “UN3077 Hazardous Waste Solid (Toluene, Methyl Ethyl Ketone)”. In mid-2023, the uniform hazardous waste manifests indicate the facility changed hazardous waste transporters from Safety Kleen to Heritage Crystal Clean with the previous hazardous waste codes listed for this waste stream as: D005, D006, D007, D008, D035, F003, F005 (see Attachment #7 for uniform hazardous waste manifests). See Attachment #8 for SDS for their most used solvent and paint. Based on the eManifest for the last couple of years, it appears that the facility shipped this waste stream almost monthly, averaging five to ten 55-gallon drums each shipment, or about 1,050 pounds to 4,450 pounds each month. The eManifest indicates the individual drum weights averaging between 350 to 425 pounds for the December and November 2023 shipments. Onsite, the waste paint booth air filters (with water) are stored in 55-gallon drums stored inside the Paint Kitchen, which functions as the central accumulation area (CAA). Heritage Crystal Clean transports the waste stream approximately monthly to Rineco Chemical Industries (Benton, Arkansas) for H061 (fuel blending prior to energy recovery) processing. During the visual inspection, I observed that the facility had one paint booth. The exhaust paint booth air filters were about 12 ft x 10 ft. (see Photo 11). Inside the Paint Kitchen (CAA) (see Photos 6-8), I observed three 55-gallon less than 180-day hazardous waste accumulation drums (hazardous waste storage drums). The drums were full, grounded, and appeared to be in good condition with no obvious damage or leaks. Each drum was labeled with a hazardous waste label, a flammable solid label, and the earliest accumulation start date of February 12, 2024.

Waste Paint and Related Materials - Keystone Electrical Manufacturing generates waste paint and solvents in their Paint Booth during the manufacturing painting process. This waste had been

determined to be D001, D035, F003, and F005. On the uniform hazardous waste manifests, it is listed as “*UNI263 Waste Paint Related Material.*” In mid-2023, the uniform hazardous waste manifests indicate that the facility changed hazardous waste transporters from Safety Kleen to Heritage Crystal Clean with the previous hazardous waste codes listed for this waste stream as: D005, D006, D007, D008, D035, F003, F005 (see Attachment #7 for uniform hazardous waste manifests). See Attachment #8 for SDS for commonly their used solvent and paint. The eManifest shows that this waste stream is transported about every two months, typically one 55-gallon drum weighing between 250 to 500 pounds. On June 10, 2022, the facility shipped six drums at 2,500 pounds. For an average of around 235 pounds per month over the last two years. Heritage Crystal Clean transports the waste approximately monthly to Rineco Chemical Industries (Benton, Arkansas) for H061 (fuel blending prior to energy recovery) processing. During the visual inspection, I observed one 55-gallon hazardous waste storage drum of waste paint inside the Paint Kitchen (CAA) (see Photos 6, 7 & 9). The black steel drum, about 1/5 full, was grounded, and appeared to be in good condition with no obvious damage or leaks. The funnel top was latched. The drum was labeled with a hazardous waste label, a flammable liquid label, and an accumulation start date of January 25, 2024. Photo 10 is an example of the label of a 5-gallon product container of one of the solvents used. Mr. Jonathan Eike (Paint Lead) stated that they use two different versions of butyl acetate based on winter verses summer. The butyl acetate product can shown is their winter solvent. During the visual inspection of the paint booth, I observed an open, unlabeled 5-gallon bucket about 1/3 full of paint located in the far-left corner of the booth (see Photo 9 and 13). Mr. Eike stated that this bucket is used to calibrate the spray gun prior to painting and functions as a satellite accumulation container (SAA). Mr. Eike stated the contents are transferred every 2-3 days into the waste paint drum in the CAA Paint Kitchen. I did not observe any spent rags, wipes, or PPE.

- **NOPE 1: Failure to label SAA container in Paint Booth with the words “Hazardous Waste” as required in 40 CFR 262.15(a)(5)(i)**
- **NOPE 2: Failure to label SAA container in Paint Booth with the nature of the hazard as required in 40 CFR 262.15(a)(5)(ii)**
- **NOPE 3: Failure to keep SAA container in Paint Booth closed as required in 40 CFR 262.15(a)(4)**

Iron Oxide Dust - Keystone Electrical Manufacturing generates about two 55-gallon drums per month of iron oxide dust from their steel laser cutter used in the manufacturing process. This waste had been determined to be non-hazardous waste based on process and product knowledge. The laser dust is collected from the laser cutter, located in the Fabrication area, by a FARR Dust collector (see Photo 3). About once or twice per month the contents of the collector are transferred into 55-gallon drums that are transferred to the Cold Storage Room for temporary storage before being picked up periodically as scrap metal for recycling by Metal Traders International (Greenwood Village, Colorado).

Scrap Metal - Keystone Electrical Manufacturing generates about 15,000 to 20,000 pounds per month of scrap metal generated from their manufacturing processes. This waste had been determined to be non-hazardous based product and process knowledge. Scrap metal included

steel, iron oxide dust (from laser cutter), aluminum, and wire (inside of a cut open 270-gallon plastic tote). The scrap metal is stored onsite in bins and a 20-cubic yard roll off, which is picked up periodically as scrap metal for recycling by Metal Traders International (Greenwood Village, Colorado). See Photos 15, 16, 18. See Attachment #11 for an invoice.

Used Oil - Keystone Electrical Manufacturing generates about 25 gallons per year of used oil, mostly from the Press Brake annual maintenance (see Photo 4). This waste had been determined to be non-hazardous based product and process knowledge and is managed as used oil. Onsite, the used oil is transferred to a 55-gallon drum in the outside Cold Storage area (see Photo 22). The black 55-gallon steel drum was 1/3 full, labeled with the words “Used Oil,” and appeared to be in good condition with no obvious damage or leaks.

Spent Detergent Pressure Washer Fluid - Keystone Electrical Manufacturing generates an unspecified amount of soapy water discharge from the spray wand cleaner used for clearing new items in their manufacturing process. This waste had been determined to be non-hazardous based product and process knowledge. During the visual inspection, I observed Mr. Joe Maize (Maintenance) working on the unit. Mr. Maize stated that he had just completed a preventive maintenance oil change of about one quart of used oil, which he transferred to the used oil drum in the Cold Storage area. He also stated that the spray washer did not use any kind of solvent to clean with, only Cal Prep 73 Detergent, which is discharged down the drain (see Photo 5). Mr. Conroy stated that the facility has a City wastewater permit for the discharge via the publicly owned treatment works (see Attachment #12 for the wastewater discharge permit).

Aerosol Cans - Keystone Electrical Manufacturing generates a few empty aerosol cans (one to two) per month from maintenance operations. The empty aerosol cans are disposed of in a 55-gallon drum and managed as universal waste. During the visual inspection in the Paint Booth area, I observed the black 55-gallon steel drum for collecting universal waste aerosol cans (see Photo 12). The drum was in good condition with no obvious damage or leaks. The lid was in place and only removed to visualize the contents. It was less than 1/10 full (about ten aerosol cans – all appeared to be empty). The drum was labeled with a “Crystal Clean Used Aerosol Cans Only” label. The universal waste-aerosol cans had been accumulation for six months and are recycled by Crystal Clean.

Waste Fluorescent Lamps - Keystone Electrical Manufacturing generates about ten waste fluorescent lamps per year from relamping activities. The facility is changing over to LED lighting, which they estimate is almost complete. Mr. Conroy stated that they manage the waste lamps as universal waste and box them up in protective boxes that are stored in the Occupational Health & Safety Office for processing. During the visual inspection, I observed one four-foot cardboard fiber box full (about 50) of universal waste-lamps. The box top was open and two of the universal waste-lamps were sticking out about six inches and were unprotected. The box was labeled with “Universal Waste Lamps” and had an accumulation start date of November 7, 2023 (see Photo 21). The universal waste-lamps are periodically sent to Heritage Crystal Kleen for recycling.

- **NOPF 5: Failure to store universal waste-lamps in a closed container as required in 40 CFR 273.13(d)(1)**

Waste Alkaline Batteries - Keystone Electrical Manufacturing generates an unspecified number of waste alkaline batteries during the manufacturing process. During the visual inspection in the Wiring Area, I observed the Universal Waste batteries station, which had two plastic containers. Only the alkaline battery container on the left had about ten AA batteries (see Photo 20) and container labeled lithium batteries on the right was empty. The containers were labeled with the words “Universal Waste Batteries”. The accumulation start date field on the labels indicated: “Satellite Accumulation”. *At the time of the inspection, I did not cite an NOPF for failing to demonstrate the length of time of accumulation, since alkaline batteries are not always considered hazardous waste or universal waste. After talking to Mr. Gendron on April 25, 2024, he confirmed that the facility did intend to consider the alkaline batteries as Universal Waste and they have already added the accumulation start date to the waste battery container’s labels. I have added NOPF 11 for this finding.*

- **NOPF 11: Failure to demonstrate the length of time that the universal waste has been accumulating as required in 40 CFR 273.15(c)**

Cardboard and Wood - Keystone Electrical Manufacturing generates about 7,000 pounds per month of recyclable cardboard and wood. The wood is collected bins and the cardboard is crushed and packed (see Photos 1 and 2). International Paper (Des Moines, Iowa) collects the recyclables monthly for recycling (see Attachment #9 for an invoice). They are also storing about 75 scrap wooden pallets in the wiring area pending recycling (see Photo 17).

General Trash - Keystone Electrical Manufacturing generates about 13 tons per month of non-hazardous general trash from shop, maintenance, and business office operations. General trash is collected in three eight-cubic yard dumpsters in the Outside North Lot (see Photo 14). Mr. Conroy estimates they generate about four eight-cubic yard dumpsters of trash monthly. The general trash is transported twice weekly by Waste Management (Des Moines, Iowa) to Polk County Landfill (see Attachment #10).

4.4 SQG Areas Reviewed

Outside Facility Perimeter - I conducted a limited inspection of the outside perimeter of the facility and observed no hazardous waste storage tanks and containers except as noted above. See the aerial and map views in Attachment #1.

Central Accumulation Areas - The Paint Kitchen functions as the CAA at this facility (see Photos 6-7). The Paint Booth CAA has a fire suppression system, and all steel drums are grounded. I asked Mr. Conroy if weekly inspections are performed on the CAA drums. Mr. Conroy stated that they do perform and log weekly CAA hazardous waste inspections. He showed us a file drawer of completed CAA weekly inspection log documents that are stored inside the Occupational Health & Safety Office. I asked if Keystone Electrical Manufacturing had made and documented arrangements with their local emergency agencies such as fire department / emergency medical services / hospital and/or their Local Emergency Planning Committee (if appropriate). I also asked for copies of these documents. Mr. Gendron (via video and phone conference call) stated that these had all been identified as “gaps” during their

consultant's review and they were currently being developed and/or updated and modified and were not currently available. I was not provided with any current documents to review regarding these topics.

SQG Preparedness and Prevention - At the time of the inspection, the facility did not have emergency contact information posted near the CAA phone.

- **NOPF 4: Failure to post emergency contact information next to a telephone as required in 40 CFR 262.16(b)(9)(ii)**
- **NOPF 6: Failure to make arrangements with local emergency response agencies as required in 40 CFR 262.16(b)(8)(vi)(A)**

SQG Personnel Training – After talking to Mr. Gendron on April 25, 2024, he confirmed that the facility does conduct waste handling and emergency procedures training, relevant to their responsibilities, for all staff with hazardous waste handling responsibilities.

4.5 LQG Areas Reviewed

LQG Preparedness and Prevention – *After the inspection was completed, I further reviewed the facility's hazardous waste generator status. From the additional review of the 2023 uniform hazardous waste manifests, it appears that the facility operated as a LQG during the months of February, March, June, July, September, and October. During these 2023 months, the facility did not appear to be following the LQG emergency preparedness/prevention and training requirements. The facility has numerous fire extinguishers, spill kits, and eye wash stations. The Paint Booth has a fire suppression system. I asked if Keystone Electrical Manufacturing had developed a contingency plan, had made and documented arrangements with their local emergency providers (fire department / emergency medical services / hospital), and if they had developed a quick reference guide. I also asked for copies of these documents. Mr. Gendron (via video and phone conference call) stated that these had all been identified as "gaps" during their consultant's review and they were currently being developed and/or updated and modified and were not currently available. I was not provided with any current documents to review regarding these topics. At the time of the inspection, I inadvertently cited LQG emergency preparedness/prevention requirements (NOPF 9-10 were rescinded). Additional EPA review is needed to determine if the facility failed to follow LQG emergency preparedness/prevention requirements (arrangements with local emergency response agencies, contingency plan, and quick reference guide) in the 2023 months.*

LQG Personnel Training - I asked for more details on their training, both initial and annual, for all staff with hazardous and universal waste handling responsibilities, as well as documentation of the training provided and course completion documentation and certifications for the staff. I also asked if they could provide job descriptions that indicate which staff and job codes have hazardous waste handling responsibilities and that indicate the requirement for both initial and annual hazardous waste handling training. Mr. Gendron (via video and phone conference call) stated that these had all been identified as "gaps" during their consultant's review and they were currently being developed and/or updated and modified and were not currently available. I was

not provided with any current documents to review regarding these topics. *At the time of the inspection, I inadvertently cited LQG training requirements (NOPFs 7-8 were rescinded). Additional EPA review is needed to determine if the facility failed to follow LQG training requirements (job titles and name of employees filling hazardous waste positions, written job descriptions for each hazardous waste position, written description of the initial and annual hazardous waste training, and records the document hazardous waste training or job experience) in the 2023 months.*

5.0 SUMMARY OF FINDINGS

- **NOPF 1: Failure to label SAA containers in Paint Booth with the words “Hazardous Waste” as required in 40 CFR 262.15(a)(5)(i)**
- **NOPF 2: Failure to label SAA containers in Paint Booth with the nature of the hazard as required in 40 CFR 262.15(a)(5)(ii)**
- **NOPF 3: Failure to keep SAA containers in Paint Booth closed as required in 40 CFR 262.15(a)(4)**
- **NOPF 4: Failure to post emergency contact information next to a telephone as required in 40 CFR 262.16(b)(9)(ii)**
- **NOPF 5: Failure to store universal waste lamps in a closed container as required in 40 CFR 273.13(d)(1)**
- **NOPF 6: Failure to make arrangements with local emergency response agencies as required in 40 CFR 262.16(b)(8)(vi)(A)**
- **NOPF 7: [RESCINDED]**
- **NOPF 8: [RESCINDED]**
- **NOPF 9: [RESCINDED]**
- **NOPF 10: [RESCINDED]**
- **NOPF 11: Failure to demonstrate the length of time that the universal waste has been accumulating as required in 40 CFR 273.15(c)**

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.

MARK HOLCOMB
(Affiliate)

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Date: 2024.04.25
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Mark Holcomb
Civil Investigator, SEE

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Amber Whisnant
RCRA Section Chief, ECAD/Chemical Branch

Attachments:

- 1) Facility Aerial Map Views (5 pages)
- 2) Photo Log (22 photos and 25 pages)
- 3) Receipt for Documents (1 page)
- 4) Confidentiality Notice (1 page)
- 5) EPA RCRA Notification Acknowledgement/Verification Report (1 page)
- 6) NOPF (2 pages)
- 7) Uniform Hazardous Waste Manifests (5 pages)
- 8) SDS – Butyl Acetate D100 & Gray Polyester Paint (23 pages)
- 9) Invoice – Recycling Paper & Cardboard (1 page)
- 10) Invoice – General Trash (1 page)
- 11) Invoice – Metal & Wire Recycling (1 page)
- 12) Waste Water Permit (9 pages)
- 13) 2024 EPA RCRA Notification Acknowledgement/Verification Report (1 page)