

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	03/06/2026	
Media Program:	RCRA	
Regulatory Program(s)	Generator	
Company Name:	Kiwo Inc.	
Facility Name:	Kiwo	
Facility Physical Location:	1929 Marvin Circle	
(city, state, zip code)	Seabrook, TX, 77586	
Mailing address:	Same	
(city, state, zip code)	Same	
County/Parish:	Harris	
Facility Phone Number	(281) 474-9777	
Facility Contact:	Joe Nuding	Title: Plant Manager
	Email: joen@kiwo.com	
FRS Number:	110063203297	
Identification/Permit Number:	TXR000084078	
Media Identifier Number:	TCEQ SWR # 96625	
NAICS:	323113, 325612, 325998	
SIC:	None	
Personnel participating in inspection:		
Bill Mansfield	US EPA Region 6	Inspector
Joe Nuding	Kiwo, Inc.	Plant Manager
EPA Lead Inspector Signature/Date	WILLIAM MANSFIELD Digitally signed by WILLIAM MANSFIELD Date: 2026.04.16 12:43:12 -05'00'	
	Bill Mansfield	Date
Supervisor Signature/Date	DEBRA PANDAK Digitally signed by DEBRA PANDAK Date: 2026.04.16 13:00:27 -05'00'	
	Debra Pandak	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

I, Bill Mansfield, EPA Region 6 inspector arrived at Kiwo at 8:56AM on 03/06/2026 for an announced inspection. I met with Joe Nuding the Plant Manager. I presented my credentials to Joe and informed him that this was an EPA inspection to determine the facility's compliance with the Resource Conservation and Recovery Act (RCRA). The scope of the inspection is a Compliance Evaluation Inspection (CEI) and includes evaluation of the facility's hazardous waste management activities.

FACILITY DESCRIPTION

Kiwo's 1929 Marvin Circle location manufactures chemical products for screen making and specialty adhesives, offering a complete line of screen making products including photo-emulsions, CLEANLINE for environmentally safe screen cleaning, specialty screen printable adhesives, KIWOMAT high precision coating machines and Computer-To-Screen equipment. The facility has approximately 27 employees. The EPA ID TXR000084078 associated with the address of 1929 Marvin Circle was last registered in RCRAinfo in February of 2026 and indicates that Kiwo operates as a Very Small Quantity Generator (VSQG).

Section II - OBSERVATIONS

During the opening conference the plant manager said the photo emulsion products process generates non-hazardous waste and ink cleaner products produced will sometimes generate hazardous waste. The plant manager also said a third party (Slick Response) handles waste characterization and chemists on-site also help to make waste determinations. Slick Response also handles pick up and disposal for the facility per the plant manager.

Production and Storage Warehouse:

Walking in the production and storage warehouse (Appendix 1, Photos 3 and 4) I observed a wash area that is used to wash photo emulsion residue out of equipment from the production line (Appendix 1, Photo 2). Per the plant manager the waste generated is non-hazardous and the sump is emptied and hauled off by Specialized Waste Services (now TAZ). I then observed a second wash area that is used for washing mixing equipment and per the plant manager the drain goes directly to the sewer (Appendix 1, Photos 5).

Diazoe Room:

Inside the warehouse is small room called the Diazoe Room. I observed a drum of expired product (Hardwater Diazoe) (Appendix 1, Photo 6). The plant manager said they cannot use it if it's expired and they would need to get it disposed of.

The Deck:

This was an upstairs area in the warehouse. The Deck is used for storing products used in the production process and includes a small area on one side to store waste, and a separate room with new and spent lamp bulbs. The waste storage area is divided into two sections, the section on the left in Photo 9 of Appendix 1 is labeled as non-hazardous waste storage and the section on the right in Photo 9 of Appendix 1 is labeled as hazardous waste storage. I observed 3 drums labeled hazardous waste in the waste storage area and per the plant manager, the drums held off-spec product that may still be used in their process, and the labels were placed on the drums to keep employees from using them by mistake (Appendix 1, Photos 8, 9, and 11). Please note that Photo 11 of Appendix 1 is a side photo of the 2 drums on the right in Photo 9 of Appendix 1 and was taken to show the hazardous waste labels that could not be seen from the front. In the separate room on the Deck, I observed lamp bulbs and per the plant manager the bulbs on the shelf are new and the bulbs in the white box are spent. The white box of universal waste lamp bulbs was not labeled (Appendix 1, Photo 10).

Section III – AREAS OF CONCERN

I observed the following Areas of Concern (AOCs):

- AOC 1 - Drums labeled hazardous waste on “The Deck”. No regulatory requirement, however a drum that is determined to be off-spec product and still able to be used in the production process, labeled as hazardous waste, is confusing when assessing compliance with hazardous waste management regulations.
- AOC 2 - Box of universal waste lamp bulbs without label. Pursuant to 40 C.F.R. § 273.14(e), Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: “Universal Waste—Lamp(s),” or “Waste Lamp(s),” or “Used Lamp(s)”.
- AOC 3 - Drum of expired hardwater Diazoe in the Diazoe room. Pursuant to 40 C.F.R. § 262.11, A person who generates a solid waste, as defined in [40 CFR 261.2](#), must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations.

CLOSING CONFERENCE

The closing meeting was attended by me, Bill Mansfield (EPA Inspector), and Joe Nuding (Plant Manager). During the closing conference, I reviewed the 3 AOCs noted during the inspection, fielded questions from facility personnel, and provided information about the next steps in the inspection process.

Section IV – FOLLOW UP

EPA is awaiting the following requested information from the facility:

1. SDSs for all chemicals (products).
2. POTW permit from City of Seabrook.
3. Hazardous waste determinations for all waste streams.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 11 photos taken 03/06/2026

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Photo No: 1

Facility/Location:		Kiwo 1929 Marvin Circle						
City:	Seabrook	County:	Harris	State:	TX	Direction:	S	
Filename:	TWC_0875.JPG	Photo Date:		03/06/2026		Time:	10:20:44	
Photographer:	Bill Mansfield			Witness Name:		NA		



Description:	Production and storage warehouse. Facility refers to the building as 1929.		
Latitude:	N/A	Longitude:	N/A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Facility/Location:	Kiwo 1929 Marvin Circle						
City:	Seabrook	County:	Harris	State:	TX	Direction:	E
Filename:	TWC_0876.JPG	Photo Date:	03/06/2026		Time:	10:23:31	
Photographer:	Bill Mansfield			Witness Name:	NA		



Description:	Process vat wash area.		
Latitude:	N/A	Longitude:	N/A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Facility/Location:	Kiwo 1929 Marvin Circle						
City:	Seabrook	County:	Harris	State:	TX	Direction:	
Filename:	TWC_0877.JPG		Photo Date:	03/06/2026		Time:	10:38:09
Photographer:	Bill Mansfield			Witness Name:	NA		



Description:	Production floor.		
Latitude:	N/A	Longitude:	N/A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Facility/Location:	Kiwo 1929 Marvin Circle						
City:	Seabrook	County:	Harris	State:	TX	Direction:	
Filename:	TWC_0878.JPG	Photo Date:	03/06/2026		Time:	10:38:18	
Photographer:	Bill Mansfield			Witness Name:	NA		



Description:	Raw material and finished goods.		
Latitude:	N/A	Longitude:	N/A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Facility/Location:	Kiwo 1929 Marvin Circle						
City:	Seabrook	County:	Harris	State:	TX	Direction:	
Filename:	TWC_0879.JPG	Photo Date:	03/06/2026		Time:	10:42:52	
Photographer:	Bill Mansfield			Witness Name:	NA		



Description:	Wash area goes to sewer.		
Latitude:	N/A	Longitude:	N/A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Facility/Location:	Kiwo 1929 Marvin Circle					
City:	Seabrook	County:	Harris	State:	TX	Direction:
Filename:	TWC_0880.JPG	Photo Date:	03/06/2026	Time:	10:57:30	
Photographer:	Bill Mansfield	Witness Name:	NA			



Description:	Drum of expired Diazoe.		
Latitude:	N/A	Longitude:	N/A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Facility/Location:	Kiwo 1929 Marvin Circle						
City:	Seabrook	County:	Harris	State:	TX	Direction:	
Filename:	TWC_0881.JPG	Photo Date:	03/06/2026		Time:	11:07:11	
Photographer:	Bill Mansfield			Witness Name:	NA		



Description:	Raw material container.		
Latitude:	N/A	Longitude:	N/A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Facility/Location:	Kiwo 1929 Marvin Circle						
City:	Seabrook	County:	Harris	State:	TX	Direction:	
Filename:	TWC_0882.JPG	Photo Date:	03/06/2026		Time:	11:08:47	
Photographer:	Bill Mansfield			Witness Name:	NA		



Description:	Drum of material that could still be used labeled as hazardous waste.		
Latitude:	N/A	Longitude:	N/A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Facility/Location:	Kiwo 1929 Marvin Circle						
City:	Seabrook	County:	Harris	State:	TX	Direction:	
Filename:	TWC_0883.JPG	Photo Date:	03/06/2026		Time:	11:10:42	
Photographer:	Bill Mansfield			Witness Name:	NA		



Description:	Waste storage area.		
Latitude:	N/A	Longitude:	N/A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Facility/Location:	Kiwo 1929 Marvin Circle						
City:	Seabrook	County:	Harris	State:	TX	Direction:	
Filename:	TWC_0884.JPG	Photo Date:	03/06/2026		Time:	11:30:34	
Photographer:	Bill Mansfield			Witness Name:	NA		



Description:	Universal waste not labeled.		
Latitude:	N/A	Longitude:	N/A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Facility/Location:	Kiwo 1929 Marvin Circle						
City:	Seabrook	County:	Harris	State:	TX	Direction:	N
Filename:	TWC_0885.JPG	Photo Date:	03/06/2026		Time:	11:32:20	
Photographer:	Bill Mansfield			Witness Name:		NA	



Description:	Drums of off spec material that could still be used, labeled as hazardous waste.		
Latitude:	N/A	Longitude:	N/A