

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

BG Products, Inc.
740 South Wichita
Wichita, KS 67213
316-249-7461
EPA Identification Number: KSR000011551

On

August 25, 2021

By

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

1.0 INTRODUCTION

I performed a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) remote virtual and a visual inspection at BG Products, Inc. (BG Products), located in Wichita, Kansas, on August 25, 2021. I conducted the inspection under the authority of RCRA Section 3007(a), as amended. During the inspection, I collected the information necessary to determine compliance with the applicable regulatory and statutory requirements. This report and attachments present the results of the inspection. Based on the information obtained during the inspection, I inspected the facility as a State of Kansas and Federal Large Quantity Generator (LQG) of hazardous waste, generator of universal waste lamps and batteries, and used oil generator. BG Products was last visited by the Kansas Department of Health and Environment (KDHE) on February 11, 2019. Five areas of concern were observed or noted as a result of the 2019 compliance assistance visit.

BG Products:

Bill Hoffman, Senior Compliance Manager
Justin Murphy, Environmental Health and Safety Manager
Ken Quinton, Director of Operations
Allen Pulliam, Maintenance Technician
Chris Middendorf, Blending Lead
Brent Radke, Senior Research Chemist

U.S. Environmental Protection Agency (EPA):

Timothy Evans, Life Scientist, ECAD
Doug Bryant, SEE/NOW Inspector, ECAD

3.0 INSPECTION PROCEDURES

On August 20, 2021, at approximately 2:30 p.m., I called BG Products and left a message for Mr. Hoffman. Mr. Hoffman returned my call at approximately 2:45 p.m. I introduced myself and explained the purpose of my call. I then asked Mr. Hoffman if I could call him back and include Mr. Bryant in the phone call. Using MS Teams, Mr. Bryant and I called Messrs. Hoffman and Murphy. I informed Mr. Hoffman that Mr. Bryant and I intended to conduct a RCRA inspection at BG Products on Wednesday, August 25, 2021. Messrs. Hoffman, Murphy, Bryant, and I established a date and time for the visual, on-site inspection as 8:30 a.m. on August 25, 2021. I asked Messrs. Hoffman and Murphy if they had time to discuss inspection documents that I routinely provide at the time of an inspection opening conference. Messrs. Hoffman and Murphy stated that they had time to discuss the documents, which I provided to Mr. Hoffman through e-mail. The following opening conference documents were discussed: pre-inspection COVID-19 related questions, a site info verification report, a blank waste stream table, and a copy of the RCRA Facility Access Information Sheet (March 2013), which provides inspection authority. I also explained my need to collect accurate information and provided Mr. Hoffman with a copy of Title 18 U.S. Code, Sections 1001 and 1002.

On August 25, 2021, Mr. Bryant and I met at BG Products at 8:30 a.m. The facility is located on the east bank of the Arkansas River, and therefore a drive-by inspection was not possible on the west perimeter of the facility. No apparent issues were observed. Mr. Bryant and I were greeted by Mr. Hoffman in front of the facility, then proceeded into the 740 South Wichita Street building. After checking in and receiving visitor passes, Mr. Hoffman escorted Mr. Bryant and me to a conference room, across the street, within the 701 Wichita Street building for the inbriefing. Mr. Bryant and I presented Mr. Hoffman with our business cards and I showed Mr. Hoffman my EPA credentials. Mr. Murphy joined us in the conference room for the in-briefing. As part of the in-briefing, Messrs. Hoffman and Murphy were made aware of BG Products' confidentiality rights and informed that a Confidentiality Notice would be provided at the end of the inspection to make, or not to make, any claims. Messrs. Hoffman and Murphy acted as the facility representatives for the RCRA CEI. Also, as part of the in-briefing, Messrs. Hoffman and Murphy provided me with a facility document entitled "Pandemic Influenza Emergency/COVID-19 Contingency Plan" which stated that masks were required for visitors .

During the inspection, discussions consisted of wastes generated and waste management practices. I conducted a visual inspection of the following areas:

701 S. Wichita Street Building

- Reclaim Sorting Area
- Less than 90-day accumulation area
- Groups 13, 20, and 99 waste stream storage area, adjacent to less than 90-day accumulation
- Satellite Accumulation Areas (SAAs) 1, 2, and 3, referred to as "SAT" on facility diagram, Attachment 5
- Reclaim Room
- Boiler Room
- Deionized Water Area

- Quality Control Laboratory
- Blending/Blend Center
- Mezzanine/Raw Material Storage (Primarily 55-Gallon Drums)
- Receiving
- International Shipments Area
- West Warehouse

Northwest Oil Water Separator

Northeast Oil Water Separator

Outfall on Arkansas River

740 S. Wichita Street Building

- Automotive Lab
- Research and Development Lab
- Lab Storage
- Raw Material Testing
- Proving Ground Test Lab
- Engineering

Boat House/Maintenance (Southwest Shed) 300 W. Indianapolis

East Building (Southeast Shed)

Four Shipping containers Located Immediately South of 701 S. Wichita Street Building

At the conclusion of the inspection, I summarized the findings and recommendations with Messrs. Hoffman, Murphy, and Quinton. I provided Mr. Hoffman with a Confidentiality Notice (Attachment 2) which he signed as acknowledgement of receipt. Mr. Hoffman made no confidentiality claims.

I also provided Mr. Hoffman with a Receipt for Documents and Samples (Attachment 3) and Notice of Preliminary Findings (NOPF) (Attachment 4), which Mr. Hoffman signed as acknowledgement of receipt.

Information collected during the inspection was documented in a bound notebook, on the KDHE Hazardous Waste Generator Requirements checklist (Attachment 1), and as discussed below.

The following inspection documents were provided to BG Products:

Inspection Documents

Confidentiality Notice

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

Receipt of Documents and Samples

Notice of Preliminary Findings

Instructions for Responding to a Notice of Preliminary Findings

I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.1D), unless noted differently. Any federal regulatory citations noted in this report are as adopted by reference in the authorized Kansas regulations.

4.0 FINDINGS AND OBSERVATIONS

4.1 General Information/Facility Description/RCRA Status

BG Products blends chemicals to create specialty automotive lubricants and fuel treatment additives, then packages the products at this facility. According to Mr. Hoffman, products are primarily oil and water-based and are packaged in a variety of sizes, including 20 mL containers up to totes. Mr. Hoffman stated that aerosol products, sold by BG Products, are made, filled, and labeled by an outside company, using BG Products recipes.

The facility consists of four buildings: 740 S. Wichita, (Administration, Auto Testing Laboratory, Research and Development Laboratory); 701 S. Wichita, (Production, Manufacturing, Assembly, Warehouse, and the Tank Farm); and two maintenance sheds south of Building 701. Four shipping containers are also utilized by the facility, immediately south of the 701 S. Wichita building, to store office furniture, equipment, and supplies. Refer to Attachment 5 for a facility site map.

701 S. Wichita Building

The 701 S. Wichita building consists of, but is not limited to, production areas, the kettle room, product storage, boiler room, electrical room, shipping/receiving loading and unloading docks, and offices, located on the first and second floors. Manufactured oil and fuel additives are packaged in this building. The kettle room contains eight large blending kettles with a combined capacity of 20,800 gallons. Raw materials are added to kettles then blended. The product is pumped via piping to twenty overhead storage tanks located on the mezzanine level. Blended raw material is then able to be pumped from the storage tanks, through product lines, to ground level packaging machines. The mezzanine level is also used for storage of 55-gallon containers of raw material. According to Mr. Murphy, approximately 40-50 different raw material products are stored on the mezzanine level. The Quality Control (QC) laboratory was located on the east side of the building mezzanine level.

Tank Farm

The product tank farm is located outside on the northwest corner of the 701 S. Wichita building. There are 37 product storage tanks within secondary containment; 6 tanks are inside a heated structure and the remaining tanks are outside. The tanks have a storage capacity of 12,000 to 32,000 gallons. Located west of the tank farm I observed one yellow polyethylene storage shed containing one 55-gallon drum used to accumulate product oil drippings. According to Messrs. Hoffman and Murphy the oil can be used at the facility. The less than 90-day hazardous waste accumulation area is located in the 701 S. Wichita building. See Attachment 5 for the less than 90-day hazardous waste accumulation area SAT locations. BG Products has 65 employees and operates Monday through Friday 6:00 a.m. to 2:30 p.m.; Environmental Health and Safety staff and other administrative personnel are available 7:00 a.m. to 5:00 p.m.

740 S. Wichita Building

The 740 S. Wichita building consists of, but is not limited to, administrative offices, the Research and Development Laboratory, and the Auto Testing Laboratory, where products are tested in motors and vehicles. At the time of the inspection, vehicle lifts were being installed in the training/teaching area.

Oil/Water Separators

Located outside, north of the 701 S. Wichita building, are two oil/water separators. The northeast separator has a storage capacity of 4,578 gallons. Process wastewater from the blending kettles area flows to the northeast oil/water separator, then drains to the Arkansas River. The northwest separator has a storage capacity of 9,156 gallons. Stormwater from drains located in the tank farm and the tanker transfer area flow to the northwest oil/water separator, then drains to the Arkansas River.

One EPA identification number is used for waste generated in all facility buildings. It should be noted that all portions of the facility meet the definition of contiguous property, which would only require the facility to have one EPA identification number.

RCRA Status

According to the RCRAInfo database, BG Products has notified as a State of Kansas and Federal Large Quantity Generator of hazardous waste. As part of the opening conference documents e-mailed to BG Products, I provided Messrs. Hoffman and Murphy with a Hazardous Waste Site Info Verification Report for Inspector form (Attachment 6). Messrs. Hoffman, Murphy, Bryant, and I reviewed the form during the virtual in briefing on August 20, 2021. Messrs. Hoffman and Murphy made no changes to the form. Based upon the amount and type of hazardous waste generated at BG Products, I inspected the facility as a State of Kansas and Federal Large Quantity Generator of hazardous waste, small quantity handler of universal waste, and used oil generator.

4.2 Changes Since Previous Inspection

The facility completed construction of the 740 S. Wichita building in April or June of 2019, which includes, but is not limited to, the new Automotive Lab, Research and Development Lab, Raw Material Testing, Proving Ground Test Lab, and administrative offices.

Justin Murphy assumed the role of Environmental Health and Safety Manager in June 2020.

Group 13 wastewater used to be directed to the northeast oil water separator. However, the City of Wichita has stopped allowing the Group 13 wastewater to flow to the separator due to elevated levels of molybdenum.

4.3 Waste Streams and Waste Management

Information related to waste streams is listed in the Waste Stream Table (Attachment 7).

4.4 Areas Visually Inspected and Related Preliminary Findings/Issues

4.4.1 Facility-Wide

Waste Determination Not Conducted, 40 CFR 262.11 (NOPF 1) – During the inspection, paper wipes, cloth rags, and absorbent pads were observed in use or accumulated in the following areas:

- The 701 S. Wichita mezzanine level, raw material storage
- The 701 S. Wichita SAT 1 and 2 (SAA container) locations
- The 740 S. Wichita Automotive Lab
- The 740 S. Wichita Research and Development Lab
- The 740 S. Wichita Proving Ground Test Lab
- Boat House/Maintenance Shed

I asked Mr. Murphy if any of the chemicals being stored on the 701 S. Wichita mezzanine level might be present on cloth rags being accumulated in a drum, located in raw material storage. Mr. Murphy stated that cloth rags generated on the mezzanine could contain any spills from the 40-50 different products being stored in the raw material area.

During inspection of the 740 S. Wichita Automotive Lab, I observed a 55-gallon drum used to accumulate red cloth rags (Photo Not Taken) and a 5-gallon black step can labeled “Soiled Absorbent Pads” (Photo 6). I asked Messrs. Hoffman and Murphy what might be on red cloth rags and soiled absorbent pads. Neither Messrs. Hoffman or Murphy knew what was on rags and absorbent pads. Messrs. Hoffman and Murphy could not locate Automotive Lab personnel to answer my question.

During inspection of the 740 S. Wichita Research and Development Lab, I observed Mr. Radke using a red cloth rag to clean inside of a hood. I asked Mr. Radke if he was using anything on the rag to clean inside the hood. Mr. Radke stated that he was using Hexane on the cloth rag. Mr. Bryant also observed Research and Development Lab personnel using paper wipes for cleaning purposes and disposing of the wipes in a trash can (Photo 5). According to lab personnel, Hexane was also being used on the paper wipes for cleaning.

During inspection of the Boat House/Maintenance shed, I observed red cloth rags on a work bench. I asked Mr. Pulliam if he used any solvents on rags. According to Mr. Pulliam, approximately 10-12 cloth rags each month have some residual solvent cleaner on them. Mr. Pulliam did not give the name or type of solvent cleaner used on red cloth rags.

Because the facility generates hexane-contaminated cloth rags and paper wipes in the 740 S. Wichita building; solvent cleaner-contaminated cloth rags in the Boat House/Maintenance shed; and cloth rags and absorbent pads contaminated with unknown types and amounts of chemicals throughout other parts of the facility, I asked Messrs. Hoffman and Murphy if a hazardous waste determination needed to be made for rags, wipes, and absorbent pads. Messrs. Hoffman and Murphy stated that a hazardous waste determination would need to be made for rags, wipes, and absorbent pads.

According to Mr. Murphy, spent cloth rags generated at the facility are laundered through Cintas in Wichita, Kansas. Paper wipes are disposed in the general trash, which is picked up by Waste Management. General trash is disposed at Plumb Thicket Landfill.

4.4.2 Blending/Blend Center

Hazardous Waste Not Containerized, 40 CFR 262.34(a)(1)(i) (NOPF 2) – During inspection of the 701 Wichita Street building, mezzanine Blend Center, I observed approximately ½ to 1 gallon of a white powder on the floor around, and on top of, Kettle 8 (Photos 10-12). I asked Messrs. Hoffman and Murphy what the white powder was. Messrs. Hoffman, Murphy, and Middendorf confirmed that the material was sodium nitrite that had been spilled while being added to Kettle 8. I asked Mr. Murphy if the sodium nitrite could still be used. Mr. Murphy stated that the sodium nitrite would not be used to make a product and would be considered a waste. During inspection of the less than 90-day accumulation area, I observed a 5-gallon black polyethylene bucket, labeled with the words “Hazardous Waste” and “Sodium Nitrite”. I asked Mr. Murphy if the sodium nitrite being managed as hazardous waste in the less than 90-day accumulation area would be similar to the sodium nitrite observed on the floor around, and on top of, Kettle 8. Mr. Murphy stated that the spilled sodium nitrite would be the same as the sodium nitrite observed in the less than 90-day accumulation area and would be cleaned up and managed as hazardous waste. According to Mr. Middendorf and Mr. Murphy, the sodium nitrite observed on the floor around, and on top of, Kettle 8 had been there approximately 1 month.

During inspection of the 701 S. Wichita Quality Control Laboratory and the 740 S. Wichita Research and Development Laboratory, I observed 5-gallon hazardous waste SAA polyethylene containers attached to sink drains (Photos 2, 3, 7, and 9). The containers were being used to accumulate titration hazardous waste. The sink valves were used to open and close the sink drain when adding titration waste to the SAA containers. However, residual titration waste was observed in the sinks (Photos 1, 4, and 8).

Maintain and Operate Facility to Minimize the Possibility of a Fire, Explosion, or Release of Hazardous Waste – Sodium Nitrite Waste on Floor next to Incompatible Product, 40 CFR 265.31 (NOPF 3) - During inspection of the Blend Center, I observed various products stored in bags and drums adjacent to uncontainerized hazardous waste sodium nitrite powder (Photos 10-12). The products in bags and drums included, but were not limited to, Sebacic Acid, 2-Ethylhexanoic Acid, and Isononoic Acid. According to the safety data sheet (SDS), sodium nitrite is a strong oxidizer and may cause a fire or explosion when in contact with reducing agents, oxidizable substances, and acids (Attachment 8). SDSs for Sebacic Acid, 2-Ethylhexanoic Acid, and Isononoic Acid are included as Attachment 9.

50-pound bags of product sodium nitrite were stored next to 25-kilogram bags of product Sebacic Acid. Product Sebacic Acid, 2-Ethylhexanoic Acid, and Isononoic Acid were within approximately three feet of the spilled sodium nitrite on the floor and approximately five feet from the sodium nitrite on top of Kettle 8.

4.5 Record Review

Weekly Inspections

Mr. Bryant reviewed inspection records dated August 22, 2018, through August 20, 2021. No apparent issues were observed during review of inspection records.

Manifests and Shipping Documents

Prior to arriving at the facility, I had conducted an on-line inspection of electronic manifests using RCRAInfo. I verified manifests were retained for at least three years. All manifests appeared to be complete, signed by the designated facility, and were accompanied by land disposal restriction (LDR) notification forms.

No apparent issues were observed during review of manifests, bill of lading, and LDR notification forms.

2019 Comprehensive Biennial Report

Prior to arriving at the facility, I was able to review the facility 2019 biennial report using RCRAInfo.

No apparent issues were observed during review of the 2019 comprehensive biennial report.

Contingency Plans – Messrs. Hoffman and Murphy provided me with a copy of the integrated contingency plan, updated August 2021, and the hazardous waste contingency plan, dated June 11, 2021. The following information was noted:

- A list of current designated emergency coordinators can be found in Table 1 of the integrated contingency plan.
- A list of all emergency equipment at the facility, location, description, and capability of the equipment is listed in Appendix H of the integrated contingency plan.
- An evacuation plan, describing signals and evacuation routes can be found in Table 5 of the integrated contingency plan and Appendix A of the hazardous waste contingency plan.
- Wichita Police and Fire will respond to an emergency at the facility

The contingency plans appeared to be complete with no apparent issues.

Personnel Training

No apparent issues were observed during review of training records.

Emergency Equipment Testing and Inspection

During the inspection, I noted ABC-rated fire extinguishers throughout the facility had been inspected by Pye-Barker Fire and Safety, Wichita, Kansas, in November 2020.

An agreement exists between Hogoboom, located in El Dorado, Kansas, and BG Products to provide booms and vacuum trucks in case of spills or releases. Hazmat Response, Great Bend, Kansas is a designated secondary responder for spills or releases at the facility.

Water supply for the facility sprinkler system is tested and serviced by McDaniel Company, Wichita, Kansas.

A land line phone is located in the less than 90-day accumulation area.

No apparent issues were observed during review of emergency equipment testing and inspection records.

5.0 SUMMARY

I inspected BG Products as a Federal and State of Kansas Large Quantity Generator of hazardous waste, small quantity handler of universal waste, and used oil generator.

Hazardous waste requirements reviewed during this inspection are discussed above and are noted on the KDHE Hazardous Waste Generator Requirements checklist included as Attachment 1.

The following preliminary findings/issues were noted as discussed above:

1. Waste Determination Not Conducted, 40 CFR 262.11 (NOPF 1).
2. Hazardous Waste Not Containerized, 40 CFR 262.34(a)(1)(i) (NOPF 2).
3. Maintain and Operate Facility to Minimize the Possibility of a Fire, Explosion, or Release of Hazardous Waste – Sodium Nitrite Waste on Floor next to Incompatible Product, 40 CFR 265.31 (NOPF 3).

Other than the items noted above, no other apparent preliminary findings were observed or cited. However, EPA post-inspection review of this report may change or add to my findings.

Evans, Tim Digitally signed by Evans, Tim
Date: 2021.10.18 09:30:28
-05'00'

Timothy R. Evans
Life Scientist
ECAD/CB/RCRA, EPA Region 7

**AMBER
WHISNANT** Digitally signed by
AMBER WHISNANT
Date: 2021.10.21
17:55:50 -05'00'

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

Attachments

1. KDHE Hazardous Waste Generator Requirements Checklist (17 pages)
2. Confidentiality Notice (1 page)
3. Document of Receipt (1 page)
4. NOPF (2 pages)
5. Facility Map (1 page)
6. Hazardous Waste Site Info Verification Report for Inspector (1 page)
7. Waste Stream Table (6 pages)
8. Sodium Nitrite SDS (10 pages)
9. Sebacic Acid, 2-Ethylhexanoic Acid, and Isononoic Acid SDSs (31 pages)

Photo Log (3 pages)

Photos (6 pages/12 photos)

Notice of Preliminary Findings

Media: RCRA

Facility Name: BG PRODUCTS, INC.
 Facility Address: 740 S. WICHITA
WICHITA, KS 67213
 EPA ID#: KSR 000011551 Date: 8.25.21

This notice is provided to call your attention to the following preliminary findings regarding state and federal regulations. This notice does not constitute a compliance order and may not be a complete listing of all findings resulting from the inspection.

Citation

Description of Finding

- | | |
|----------------------------------|--|
| 1. <u>40 CFR 262.11</u> | <u>WASTE DETERMINATION NOT CONDUCTED FOR THE FOLLOWING:</u>
<u>• SOLVENT-CONTAMINATED PAPER WIPES</u>
<u>• " " " RED RAGS</u>
<u>• " " " ABSORBENT PADS</u> |
| 2. <u>40 CFR 262.34(a)(1)(i)</u> | <u>HAZARDOUS WASTE NOT CONTAINERIZED</u>
<u>SODIUM NITRITE AND TITRATION WASTE</u> |
| 3. <u>40 CFR 265.31</u> | <u>FACILITY NOT MAINTAINED TO MINIMIZE</u>
<u>FIRE, EXPLOSION, OR ANY UNPLANNED RELEASE</u>
<u>OF HW OR HW CONSTITUENT</u> |

As a continuation of the inspection performed at your facility, you are asked to submit a written response within 14 calendar days of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U.S. Environmental Protection Agency
 Region 7, Enforcement & Compliance Assurance Division (ECAD)
 11201 Renner Boulevard, Lenexa, KS 66219
 ATTN: TIMOTHY R. EVANS

If you have any questions about this Notice or wish to discuss your response, you may call me at (913) 551-7663, or EDWIN BUCKNER (Compliance Officer) at (913) 551-7621.

This Notice prepared by Timothy R. Evans Date: 8.25.21

The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: Bill Hoffmann

Signature: [Signature]

Title: Sr. Compliance Manager

Date: 8-25-21

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

Note: The instructions below are being provided to assist you if you choose to submit a written response to the preliminary findings identified in the EPA's NOPF. This is an opportunity for you to provide to the EPA any and all information that you believe is relevant to these preliminary findings and your efforts to return to compliance with the regulatory requirements. The EPA will consider information submitted by you in determining our enforcement response to the preliminary findings identified at your facility, but please be advised that any information you submit may be used in a subsequent enforcement action.

1. Identify the person(s) responding to the NOPF authorized to make statements for the facility, including the person's name, title, and telephone numbers, if different from the facility's telephone number. For each numbered preliminary finding, identify all persons consulted in the preparation of the answer.
2. Your answers should address and reference each numbered preliminary finding separately.
3. Each of your answers should identify all documents consulted, examined, or referred to in the preparation of the response, or that contain information responsive to the preliminary finding. Please provide legible copies of all such documents. For each document provided, indicate on the document (or in some similar manner) the number of the preliminary finding to which it responds.
4. Describe all actions taken by you to correct the preliminary findings identified in the NOPF and/or a schedule for completing the necessary corrective actions for each numbered preliminary finding. If the preliminary finding has been corrected, please provide the date the preliminary finding was corrected.
5. Your responses should include documentation, photographs, drawings, etc. of corrected preliminary findings where applicable (for example, photographs of properly labeled containers). The information submitted should indicate the number of the preliminary finding to which it corresponds.
6. If information responsive to a preliminary finding is not in your possession, identify the person(s) from whom the information may be obtained.
7. If different or new procedures are put in place to prevent the same or similar preliminary findings, provide a description of those procedures.
8. If you want to make a confidentiality claim pursuant to 40 C.F.R. Part 2, Subpart B covering part or all of the information submitted, identify the material with words such as "trade secret," "proprietary," or "company confidential." Refer to the Confidentiality Notice provided to you at the time of the inspection.
9. If you choose to respond, and plan to submit your response after 14 calendar days, please discuss your plans with the compliance officer noted on the NOPF.

RCRA Inspected Facilities:

If your facility was cited for hazardous waste determination preliminary findings, provide the following information for each waste stream and/or each waste unit listed:

- a. specify the waste name;
- b. indicate whether the waste is hazardous, non-hazardous, used oil, universal waste, or exempt from regulation (if you claim the waste is exempt from regulation, include the regulatory reference that you believe is applicable to the exemption for the waste);
- c. state whether process knowledge or analytical testing was used to make the determination (attach all supporting documentation, i.e., the specific documents (e.g., Safety Data Sheets) used as process knowledge);
- d. if the waste is a hazardous waste, list all applicable RCRA waste code(s) and the hazardous properties (Ignitable, Reactive, Corrosive, Toxic);
- e. if the waste is a hazardous waste, used oil, or universal waste,
 - i. indicate the quantity or monthly generation rate of this waste at your facility;
 - ii. indicate the length of time the waste has been generated at your facility, and how long the waste has been stored at your facility;
 - iii. state how you plan to handle or manage the waste at your facility;
 - iv. if applicable, describe your facility's plans for disposing the waste (attach all supporting documentation, e.g., any shipping documents or arrangements made for shipping documents); and,
- f. if the waste is non-hazardous or if you believe it is exempt from regulation, provide information on how it will be disposed, recycled, or used, and where these activities will occur.