REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

Bunge Corporation
19560 Bunge Avenue
Council Bluffs, IA 51502
(712) 366-8446

EPA ID Number: IAR000005959

On

June 7, 2022

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 Bunge Corporation (Bunge) in Council Bluffs, Iowa on June 7, 2022. 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

Bunge Corporation:
Joe Score, Compliance Manager
Becky Coleman, EHS Coordinator
James Burris, Environmental Specialist, Corporate in St. Louis

EPA Representative, ERG:
Joseph Watson, Senior Chemical Engineer

3.0 INSPECTION PRECEDURES

After arriving unannounced at Bunge at approximately 08:35, I performed a drive-by visual inspection of the facility and took a photograph before beginning the inspection and did not note any areas of concern. I then entered the main entrance and I introduced myself to the front desk attendant. I explained my reason for being on site is to conduct a RCRA CEI and asked to meet with the facility personnel who manages hazardous waste on site. Mr. Score then greeted me in the lobby and led me to the training room to begin the opening conference at approximately 09:00. I initiated the opening conference with Mr. Score, Mr. Burris, and Ms. Coleman as Bunge representatives. I presented Mr. Score and Ms. Coleman 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 them with a copy of Title 18 U.S. Code, Sections 1001 and 1002. I then presented Mr. Score with a copy of the *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections* and reviewed Bunge's confidentiality rights. I informed Mr. Score 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. Score explained facility operations and locations of hazardous waste generation and management. During the discussion, Bunge's confidential business information policy was discussed. Bunge's policy states that all photographs and documents requested during an inspection must be approved by their legal department before they can be provided to the inspector to take off site. All documents requested on June 7, 2022 were emailed to corporate for review. I completed the Receipt for Documents and Samples and the Confidentiality Notice (Notice) prior to exiting the facility on June 7, 2022 but did not leave the facility with any documents. On June 8, 2022, I received an email from Joe Score providing electronic documents of the files I requested the previous day. The email stated that Bunge will claim the plot plan/site map and the aerial photo indicating waste/recycling collection points as confidential business information since Bunge had concerns about potentially identifying waste generation points and waste collection points on a map in a public document. The Receipt for Documents and Samples and the Notice was signed by Mr. Score on June 8, 2022. A separate email was sent containing photographs. I did not download the plot plan/site map and the aerial photo indicating waste/recycling collection points from the email to eliminate managing any portions of this report as confidential business information. Therefore, an aerial photograph was taken from Google Maps to generically show the facility in relation to its surroundings (see Attachment 1).

As stated above, at the conclusion of the inspection, on June 7, 2022, I provided Mr. Score with a *Confidentiality Notice,* and *Receipt for Documents and Samples* which Mr. Score signed as acknowledgement of receipt and provided in the email on June 8, 2022 (see Attachments 5 and 6, respectively). Mr. Score identified the plot plan/site map and the aerial photo indicating waste/recycling collection points as confidential business information on the Notice. On August 4, 2022, I contacted Mr. Score to confirm that there are no facility process areas or waste

management sites physically identified on the generic map downloaded from Google Maps. I also told him that I did include physical descriptions in the report where waste is generated and managed in the facility but these descriptions are not related to physical locations on the map. I asked Mr. Score if the generic Google map would be acceptable to resolving any previous confidential business information Notice claims by Bunge. Mr. Score stated that this was acceptable to him since there were no process areas or waste management sites physically identified on the generic site map.

During the visual inspection of the facility, Mr. Score 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 two SAAs, one CAA, and one universal waste accumulation area for batteries. The facility was not handling universal waste at the time of the inspection. Bunge uses six nonhazardous parts washers in the maintenance area and throughout the facility. I conducted an in-depth visual inspection of the SAAs, the CAA, the universal waste accumulation area, used oil storage area, and all manufacturing areas.

Eight photographs were collected as inspection documentation and are shown in Attachments 2 and 3. I took the initial photograph at the entrance of the facility. Due to the use of solvents on site, only intrinsically safe equipment is allowed to be used in the plant area. As a result, Mr. Score took the remaining photographs using an intrinsically safe device. 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.

The following inspection documents and compliance assistance handouts were left with Bunge:

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 (Facility copy)
Receipt of Documents and Samples (Facility copy)
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 Wipes Final Rule Summary Chart

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

Bunge began operating in 1999 and currently employs approximately 125 people. The facility operates 24/7 operating a 12-hour shift schedule. The facility has a footprint of approximately 260,000 square feet. The facility representatives did not know the area of the site property and were unable to provide an estimate. Bunge's operations consist of processing soybeans into soy meal, soy oil, and livestock dietary feed. The primary raw materials used are soybeans, diatomaceous earth, and solvents. The major manufacturing or processing operations that generate waste streams include a quality control (QC) lab, maintenance activities, and soybean processing. The following waste streams are produced: QC lab waste, spent diatomaceous earth 'spent bleaching earth', nonhazardous rags/personal protective equipment (PPE), aerosol cans, nonhazardous parts washer solutions, scrap metal, used oil, used oil filters, nonhazardous waste lamps, universal waste batteries, sump sludge, and general trash.

4.2 RCRA Status

According to the *Hazardous Waste Site Info Verification Report for Inspector* (see Attachment 7), Bunge notified as a federal Small Quantity Generator (SQG) of D001, D002, D007, and F003 hazardous wastes. I asked Mr. Score 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. Mr. Score provided site contact and owner information. After reviewing the records and walking through the facility, it appears that the facility is operating as a federal SQG of D001, D002, D007, and F003 hazardous wastes, a generator of used oil, and a small quantity handler (SQH) of universal waste. Bunge generates approximately 700 pounds of hazardous waste monthly based on a review of facility records, a visual inspection of process and waste management areas, and interviewing personnel. Bunge was never previously inspected for RCRA compliance.

4.3 Facility Waste Streams and Management

A Waste Stream and Waste Handling Table for Bunge 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	Laboratory Waste QA Testing of Soybean Seeds and Oils (Waste Profile included in Attachment 8)	Laboratory Waste	D001 and F003 (Based on process knowledge	Four 55-gallon containers every three months	Initially collected in 1-gallon containers in the laboratory and transferred into 55-gallon containers in the CAA	Hydrite Chemical (IAT200010593) in Waterloo, IA to Hydrite Chemical Co. (WID000808824) in Cottage Grove, WI for reclamation
2	Spent Bleaching Earth (Nonhazardous Industrial Solid (Waste Profile included in Attachment 9)	Soybean oil refining	Nonhazardous (based on process knowledge and knowledge of the product)	1,950 tons per year	40-yard container	Darling Ingredients Muscatine, IA for recycling (Sample Nonhazardous Waste Manifest - Attachment 10)
3	Lab Solids/Oily Rags / PPE	Miscellaneous lab solids, PPE, absorbent pads, used paint buckets/cups	Nonhazardous (based on process knowledge and knowledge of the product)	Unknown - not tracked	General trash 20-yard container	Waste Connections in Ceresco, NE to Loess Hills Regional Sanitary Landfill in Mitchell Malvern, IA (IAD000678185) for landfill
4	Grease/Used oil Absorbent (Waste Profile included in Attachment 11)	Clean up from spills absorbent material	Nonhazardous (based on process knowledge and knowledge of the product)	Four 55-gallon containers per year	55-gallon container	Clean Harbors Deer Trail LLC in Deer Trail, CO (COD991300484) for disposal or fuel blending

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
5	Aerosol Cans	Use aerosol can until empty and dispose of in scrap metal recycling.	Use can until RCRA empty and replacing aerosol cans containing hazardous materials with aerosol cans containing nonhazardous materials, (SDS included in Attachment 12).	Unknown - not tracked	General trash 20-yard container	Heimes Corporation/ESI of Omaha, NE (NER00008128) collects and transports to the Loess Hills Regional Sanitary Landfill in Mitchell Malvern, IA (IAD000678185) for landfill
6	Sump Skimming and Sludge	Plant shutdown and cleanout	Nonhazardous (based on process knowledge and knowledge of the product)	Approximately 2,000 gallons per event	10,000-gallon frac tanks	Heimes Corporation/ESI of Omaha, NE (NER00008128) collects and transports to the Loess Hills Regional Sanitary Landfill in Mitchell Malvern, IA (IAD000678185) for landfill (Special Waste Manifest Disposal Ticket – Attachment 13).
7	Nonhazardous Parts Washer Solvent (SDS included in Attachment 14)	Cleaning oil and greases off small maintenance tools and parts	Nonhazardous (based on process knowledge and knowledge of the product)	300 gallons serviced every three months	In parts washer	Safety Kleen in Omaha NE (NED981495724) for recycling (Invoice - Attachment 15)

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
8	Used Oil	Maintenance of facility machinery and equipment	Nonhazardous/Excluded (managed as used oil per 40 CFR 279)	1,200 gallons per year	350-gallon and 275-gallon containers	Product Recovery and Recycling of Fort Calhoun, NE (NER000502732) (Invoice - Attachment 16) for recycling
9	Used Oil Filters	Facility maintenance	Nonhazardous (based on process knowledge and knowledge of the product)	½ 55-gallon drum per year	Hot drained and punctured and then added to general trash 20-yard container	Waste Connections in Ceresco, NE to Loess Hills Regional Sanitary Landfill in Mitchell Malvern, IA (IAD000678185) for landfill
10	Scrap Metal	Facility operations	Excluded (based on management and process knowledge) recycled as scrap metal	500,000 pounds per year	Various sizes ranging up to 5-yard containers	Alter Metal Recycling - Council Bluffs, Council Bluffs, IA (IAD056841117) for recycling (Invoice - Attachment 17)
11	Waste Fluorescent Lamps	Facility maintenance	Nonhazardous	Use green-tip fluorescent lamps disposed of in trash. Has not shipped lamps off site in over one year	General trash 20-yard container	Waste Connections in Omaha, NE to Loess Hills Regional Sanitary Landfill in Mitchell Malvern, IA (IAD000678185) for landfill

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
12	Waste Grain Products	Railcar cleanout, residuals	Nonhazardous (based on process knowledge and knowledge of the product)	Unknown - not tracked	40-yard container	Johnson Coopering of Council Bluffs, IA, primarily composted
13	Paper/Corrugated Cardboard	Facility Operations	Nonhazardous (based on process knowledge and knowledge of the product)	Six tons per year (Waste Tracking Spreadsheet 2021 – Attachment 18)	General trash 20-yard container	Waste Connections in Omaha, NE to First Star Fiber in Omaha, NE for recycling or reprocessing
14	Universal Waste Batteries	Facility maintenance	Nonhazardous/Excluded (managed as universal waste)	Three 5-gallon containers per year	5-gallon container	Veolia ES Technical Solutions, LLC in Port Washington, WI (WID988566543) for recycling (Invoice - Attachment 19)
15	Laboratory Waste Chemicals	D001, D002, and D007 (Based on process knowledge	Periodic cleanout of expired lab chemicals	Less than 10 gallons per year	LabPak	Hydrite Chemical (IAT200010593) in Waterloo, IA to Clean Harbors Environmental Services, Inc. (NED981723513) in Kimball, NE for disposal or incineration.
16	General Trash	Facility operations	Nonhazardous (based on process knowledge and knowledge of the product)	Approximately 1,300 Short Tons per Year	General trash 20-yard container	Waste Connections in Omaha, NE to Loess Hills Regional Sanitary Landfill in Mitchell Malvern, IA (IAD000678185) for landfill

4.4 Less-Than-180-Day Hazardous Waste Accumulation Area

Bunge has one less than 180-day CAA on site, which is located in a room connected to the QC Lab. The exterior of the door had signage identifying the area as a CAA. I asked Mr. Score why there was not a no smoking sign on the door. Mr. Score stated smoking is not allowed in the facility due to the extensive use of solvents on site. Therefore, it would not be possible for any smoking to occur near or at the CAA. He also stated that is why he had to use an intrinsically safe device to take photographs. I told Mr. Score of the requirement of posting a no smoking sign. I did not leave a finding for this issue but further EPA review may add a finding for this issue. Inside the CAA, I observed hazardous lab waste being accumulated (see Attachment 3, Photos 3-4). There was a total of three 55-gallon containers of lab waste being accumulated in the CAA. The three 55-gallon containers were closed, in good condition, were labeled as "Hazardous Waste", labeled with an indication of the nature of the hazard, and had accumulation start dates. During the visual inspection, I observed all labels facing a direction that could be visible to personnel conducting CAA inspections. The oldest accumulation start date observed was March 17, 2022, which was observed on a 55-gallon container of hazardous lab waste. March 17, 2022 is within 180 days prior to the date of the inspection.

I observed adequate aisle space to allow for container inspections and access in the event of a spill. The containers were located upon spill containment pallets. I observed spill control equipment, and related safety equipment in close proximity to the CAA. Operators handling hazardous waste are trained to use their two-way radio system in case of emergencies. Bunge has posted the required emergency response information next to the phone located in close proximity to the CAA. In addition, safety and emergency equipment were present and in satisfactory condition near the CAA as required per 40 CFR 262.16(b)(9)(ii). Mr. Score explained this area is restricted and only staff actively managing hazardous waste who have been adequately trained and complete annual refresher training have access to the CAA. I asked Mr. Score if the facility inspected the CAA. Mr. Score stated the facility inspected the CAA at least weekly and had weekly inspection logs.

During records review, Mr. Zach Polson, Quality Manager, provided inspection logs for the CAA. I reviewed the logs, and it appeared the facility was adequately performing weekly inspections of the CAA. An example of a CAA log is provided in Attachment 20.

I did not note any issues or findings at the CAA during the inspection.

4.5 Satellite Accumulation Areas

I observed two satellite areas during the visual inspection. The table below shows the SAA name or location, waste type, volume of waste observed, and container type.

SAA #	SAA Name or Location	Waste Type	Volume of Waste	Container Type
1	QC Lab	Laboratory Waste	0.25 gallons	1-gallon container
2	QC Lab	Laboratory Waste	0.1 gallons	1-gallon container

During the visual inspection, I observed two SAAs in the QC Lab accumulating hazardous laboratory waste from the testing of soybean oil and seeds. A detailed discussion of the laboratory is included in Section 4.7 of this report. The hazardous waste accumulation containers observed in the SAAs were in good condition, closed, labeled with the indication of the nature of the hazard, and labeled with the words "Hazardous Waste" (see Attachment 3, Photo 5).
I reviewed the management of the SAAs, and no issues or findings were noted.

4.6 Soybean Processing Operations

During the visual inspection, I observed soybean processing operations with descriptions provided by Mr. Score. Truckloads of soybeans arrive onsite via railcar and truck. Probing stations on site check the shipments for the quality of the beans and foreign debris in the shipment. Shipments are accepted or rejected based on quality standards. The shipments are unloaded and sent to a dryer to crack the hulls. Waste grain products are collected by Johnson Coopering primarily for composting.

Soybeans are then sent to a tempering bin. The soybeans are then sent to a prep building where the hulls are removed. The hulls are then collected and pelletized and sold for its high fiber content. The soybeans are further processed before being sent to the extraction plant for recovering the oil with a solvent extract process. This process generates flakes which are sold as a high protein meal and a crude soybean oil which is sent to the refinery for further processing. Bunge has a Title V permit for the facility including the soybean processing operations (see Attachment 21). The crude soybean oil sent to the refinery undergoes further processing with heat and an aqueous solution before centrifuging out the oil. Bunge reuses the aqueous solution. The oil undergoes further processing through a diatomaceous earth/sand filter to remove minerals such as iron, manganese, and calcium. Bunge ships the spent bleaching earth (diatomaceous earth/sand) to Darling Ingredients Muscatine, IA for additional oil recovery and recycling (see Attachment 3, Photo 6). As of April 2022, the facility has started to accumulate a nickel catalyst used in the process for recycling but has not had a shipment sent out for recycling as of the date of the inspection. The soybean oil is further processed generating the final oil product and a soy distillate used in animal feed. Periodically, the sumps in the processing are cleaned out by Heimes Corporation/ESI and the nonhazardous sludge is disposed of in the Loess Hills Regional Sanitary Landfill.

I did not observe or note any issues or findings with soybean processing operations.

4.7 Quality Control Laboratory

Bunge operates a QC Lab which generates most of the hazardous waste at the facility. The most common hazardous waste generates are D001 and F003 hazardous wastes. These wastes are generated from using acetone in various analytical testing procedures. The waste profile for this waste stream is provided in Attachment 8. The QC lab primarily conducts quality assurance testing of soybean oil and seeds. Typical analyses include percent peroxide values, percent fatty acid, and percent soaps. Bunge operates two SAAs, each with a one-gallon container to accumulate spent hazardous waste. The two SAA containers are then transferred into a 55-gallon container in the CAA at the end of each day. The lab periodically generates small quantities of LabPak wastes when disposing of expired or unused chemicals. The last shipment of LabPak waste also included D002 and D007 hazardous waste codes for reagents used.
I did not observe or note any issues or findings with QC Lab operations

4.8 Parts Washers

At the time of the inspection, the facility was operating six 55-gallon parts washers located throughout the facility. Mr. Score explained the parts washer is used by maintenance staff to clean greases and oils off of small tools. Mr. Score stated the facility parts washer solution is a nonhazardous parts washer solution and the parts washers are serviced once every three months by Safety Kleen. The parts washers holds approximately 50 gallons of solvent solution (see Attachment 3, Photo 8). The SDS for the parts washer is provided in Attachment 14. An invoice for how servicing is documented is provided in Attachment 15. I did not note any issues or findings with any of the parts washers.

4.9 Universal Waste Accumulation Area

Bunge manages universal waste next to the maintenance area. At the time of the inspection, I did not observe any universal waste currently being managed or accumulated on site. At the time of the inspection, the facility was not accumulating universal waste batteries on site. A receipt of a recent shipment of universal waste batteries for recycling is shown in Attachment 19. Mr. Score stated that the facility uses green-tip universal waste lamps in facility areas that have not converted over to light emitting diode (LED) lights. During the visual inspection, I only observed green-tipped fluorescent lights being used. The green-tip fluorescent lamps are disposed of in the general trash. I reviewed the management of all universal waste storage areas throughout the facility and no issues or findings were noted.

4.10 Used Oil

I visually observed the used oil storage areas on site. Used Oil is generated from facility maintenance of equipment. The oil storage area contained two 350-gallon and one 275-gallon

totes that store used oil (see Attachment 4, Photo 7). The totes were closed, in good condition, and labeled as "Used Oil". An invoice is provided for off-site shipments as an example in Attachment 16.

I did not note any issues or findings at the used oil storage area.

4.11 Other Regulatory Requirements

I reviewed the preparedness, prevention, and emergency requirements and no issues or findings were noted.

Preparedness, Prevention, and Emergency Requirements - Safety and emergency equipment were present and in satisfactory condition in areas throughout the facility, including in close proximity to the CAA (as noted in Section 4.4 of this report). Appropriate arrangements and coordination were made with necessary State and local emergency agencies.

I reviewed the preparedness, prevention, and emergency requirements and no issues or findings were noted. Based on the visual inspection and discussions with employees, it appeared the employees are familiar with waste handling and emergency procedures. The employees appeared to be aware of RCRA regulations and were knowledgeable of waste management and handling. Mr. Gregory explained as a best management practice, the facility refreshes hazardous waste training annually.

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

Manifest and Land Disposal Restriction (LDR) Requirements – Bunge maintained records of manifests on site at the time of inspection dating back three years. A total of 13 hazardous waste manifests were generated in the last three years and 13 of these manifests were reviewed on site. Examples of hazardous waste manifests are provided in Attachment 22. The example manifests in Attachment 22 was printed from EPA's RCRAInfo while on site since I was unable to take any documents off site without going through Bunge's internal confidential business information review process first. All manifests reviewed were signed by the required parties and returned in the required timeframe. I reviewed all other manifest and LDR requirements and no issues or findings were noted.

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

Joseph Watson

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Date: 2022.08.04 16:25:58 -04'00'

Joseph Watson
Senior Chemical Engineer
Date: August 4, 2022

AMBER WHISNANT

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Date: 2022.08.05 17:44:54 -05'00'

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

Attachments:

1. Aerial Photograph (1 page)
2. Bunge Corporation Photolog (1 page)
3. Bunge Corporation Photos (8 photos/9 pages)
4. EPA Inspection Checklist (25 pages)
5. Confidentiality Notice (1 page)
6. Receipt for Documents and Samples (1 page)
7. Hazardous Waste Site Info Verification Report for Inspector (1 page)
8. QA Testing Lab Waste Profile (4 pages)
9. Spent Bleaching Earth Waste Profiles (2 pages)
10. Spent Bleaching Earth Nonhazardous Waste Manifest (1 page)
11. Grease Used Oil Absorbent Waste Profile (3 pages)
12. Knocker Loose SDS (11 pages)
13. Sump Sludge Special Waste Manifest Disposal Ticket (1 page)
14. Parts Washer SDS (13 pages)
15. Parts Washer Invoice (2 pages)
16. Used Oil Invoice (1 page)
17. Scrap Metal Recycling Invoice (1 page)
18. Waste Tracking Spreadsheet (1 page)
19. Universal Waste Battery Recycling Receipt (1 page)
20. CAA Log (2 pages)
21. Title V Permit (100 pages)
22. Hazardous Waste Manifest (2 pages)