

RCRA Inspection Report

1) Inspector and Author of Report

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U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303

2) Facility Information

Dunbarton Corporation Rediframe Division
1101 Technology Drive
Dothan, Alabama 36303
Houston County

EPA ID: ALR000012674
NAICS: 332321 - Metal Window and Door
Manufacturing

3) Responsible Official

Deanne Coleman
Human Resources Manager
Dunbarton Corporation Rediframe Division
1101 Technology Drive
Dothan, Alabama 36303
deannec@dunbarton.com

4) Inspection Participants

Deanne Coleman, Dunbarton Corporation Rediframe Div
Jeffrey Cannon, Dunbarton Corporation Rediframe Div
JT Young, Dunbarton Corporation Rediframe Div

Craig Schimmer, ADEM
Novelle Smith, US EPA Region 4 Atlanta
Margaret Zacharias, US EPA Region 4 Atlanta
Paula Whiting, US EPA Region 4 Atlanta

5) Date and Time of Inspection

January 14, 2025, at 9:45 a.m. CST

6) Applicable Regulations¹

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

Alabama Hazardous Waste Management and Minimization Act of 1978, Ala. Code § 22-30-1 et seq., and rules 335-14-1 to 335-14-17 (2016 and 2018) of the Alabama Department of Environmental

¹ As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions will be to the authorized State program. However, for ease of reference, the federal citations will follow in brackets.

Management (ADEM) Administrative Code (ADEM Admin. Code)

Pursuant to ADEM Admin. Code 335-14-1-.02-(1)(a)111. [40 C.F.R. § 260.10], a large quantity generator of hazardous waste (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by KRS 224.46-520(1) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with ADEM Admin. Code r. 335-14-3-.01(6) (b) or (7)(a)) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in ADEM Admin. Code r. 335-14-3-.01(5)(a)7 and 8) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a) [40 C.F.R. § 262.17], a large quantity generator (LQG) may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in ADEM Admin. Code r. 335-14-3-.01(7)(a) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to ADEM Admin. Code r. 335-14-11-.02(1)(a)244. [40 C.F.R. § 273.9], a “Small Quantity Handler of Universal Waste” (SQHUW) is a Universal Waste handler who does not accumulate 5,000 kilograms or more of Universal Waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time.

7) **Purpose of Inspection**

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection (CEI) to determine Dunbarton Corporation Rediframe Division (EPA ID Number: ALR000012674) compliance with the applicable requirements of RCRA and the corresponding ADEM regulations. This was an EPA lead inspection.

8) **Facility Description**

Dunbarton Corporation Rediframe Division (Dunbarton) manufactures three building product lines: Rediframe® Prefinished Door Frames, Slimfold® Closet Systems, and Achiever® Entry Systems. The facility produces Barlites – interior windows, bi-fold steel doors and steel doors. Production is located in Dothan, Alabama, and is supported by a nationwide network of distributors and a satellite facility in Camden, Tennessee. Banded cold steel coils are formed, stamped, painted, washed, painted and oven cured to order.

Dunbarton Corporation Rediframe Division has 125,000 square feet of production that includes offices, fabrication, paint lines, maintenance, tool/die shop and a warehouse. The facility employs 150 employees with 100 employees handling hazardous waste. The facility operates four shifts, 8 hours a day, five days per week.

Dunbarton Corp Rediframe Division's most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated February 27, 2024 characterized the facility as a Large Quantity Generator (LQG) of hazardous waste. Dunbarton Corp Rediframe Division may generate hazardous waste streams D001, F003 and F005, spent aerosol cans, used solvent, used oil, universal lamps and batteries, paint waste and other wastes. This facility was last inspected on March 23, 2023, by ADEM. No violations were identified.

9) Previous Inspection History

ADEM has conducted eight RCRA CEIs at the subject facility between 2006 and 2023 and found 33 violations during those inspections.

On March 23, 2023, ADEM conducted the most recent RCRA CEI at the subject facility and found no apparent violations of the RCRA's requirements.

10) Findings

On January 14, 2025, EPA inspectors Paula Whiting, Novelle Smith and Margaret Zacharias, accompanied by ADEM inspector Craig Schimmer arrived at Dunbarton Corporation Rediframe Division at approximately 9:45 a.m. CST. The inspectors entered the facility and were escorted to a conference room. Deanne Coleman, Human Resources Manager, immediately received the inspectors. Deanne Coleman and the inspectors were joined by Jeff Cannon, Environmental Health and Safety Manager, and JT Young, Director of Operations, for the opening conference. The inspectors introduced themselves, showed their credentials to Deanne Coleman and explained the purpose of the visit.

The inspectors described the anticipated use of a digital camera during the inspection and provided a request for records. The EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>. The EPA inspector also discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to the EPA. The company did not assert a business confidentiality claim.

Deanne Coleman, Jeff Cannon and JT Young provided an overview of the facility's history and current operations during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before the facility

representative led the inspectors on a tour of the facility operations. Below is a description of the observations made during the inspection.

11) Inspection Observations

11.1 Production Floor

The tour began in the Steel Bay where the coils of cold press steel are stored prior to cutting and forming. The inspectors walked through the manufacturing area and observed the scrap metal being collected for recycling to Enfinger Steel Recycling. An evacuation map was observed on a bulletin board located on the production floor.

The inspectors observed gear oil leaks on the floor around two of the Press Brakes (Pictures 1-2). Absorbent pads used to collect the oil leaks were full and leaking and needed to be replaced.

Pursuant to ADEM Admin. Code r. 335-14-17-.03(4)(d) [40 C.F.R. § 279.22(d)], upon detection of a release of used oil to the environment, the facility must clean up and manage properly the released used oil and other materials.

The used oil drum storage was located in the rear of the building. At the time of the inspection, the inspectors observed the following (Pictures 3-8):

- An oil tank on secondary containment pallet had a black drip catch pan below the nozzle that was full and needed to be cleaned, and not labeled. The secondary containment pallet was also full of used oil and need to be cleaned out.
- The floor surrounding the used oil drum storage area was saturated with oil and covered in absorbent.
- Two 55-gallon oil containers on a dual dispensing and spill containment system. The containment system was filled with used oil and debris and needed to be cleaned out. The containers were closed and labeled.
- Three white 5-gallon containers of used oil. One of the containers was not closed.
- Two black 55-gallon containers of used oil. One of the containers had a funnel that was not closed, and the top of the second container was covered in used oil and needed to be cleaned off.

Pursuant to ADEM Admin. Code r. 335-14-17-.03(4)(a)1. Used oil generators shall not store used oil in units other than used oil tanks, containers, or units subject to regulation under Chapters 335-14-5 and 335-14-6. A container holding used oil must always be closed during storage, except when it is necessary to add or remove used oil.

Pursuant to ADEM Admin. Code r. 335-14-17-.03(4)(c)1. [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

Pursuant to ADEM Admin. Code r. 335-14-17-.03(4)(d) [40 C.F.R. § 279.22(d)], upon detection of a release of used oil to the environment, the facility must clean up and manage properly the released used oil and other materials.

11.2 Paint Area Central Accumulation Area (CAA):

Dunbarton manages a hazardous waste CAA inside the Paint Mixing Room. The Paint Mixing Room contains the paint tank systems used on the products. The area was identified with a sign which read "Hazardous Waste Storage Area." Dunbarton manages ignitable waste in this CAA, and the inspectors did not observe "No Smoking" signs in the Paint Mixing area.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)1.(vi)(II) [40 C.F.R. § 262.17(a)(1)(vi)(B)], which is a condition of the LQG Permit Exemption, a generator is required to prevent accidental ignition or reaction of ignitable or reactive waste. This waste must be separated and protected from sources of ignition or reaction including but not limited to the following: Open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat. While ignitable or reactive waste is being handled, the large quantity generator must confine smoking and open flame to specially designated locations. "No Smoking" signs must be conspicuously placed wherever there is a hazard from ignitable or reactive waste.

The CAA is equipped with an internal communications or alarm system capable of providing immediate emergency instruction to facility personnel; it is equipped with a device capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams; it is equipped with portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment; and it is equipped with water to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray system.

The inspectors toured the Paint Area and observed a 55-gallon container of universal waste aerosol cans in Filter Receiving (Pictures 10-11). The container was closed, labeled, and dated March 23, 2024.

Next door, in the Paint Mixing Room, was the less than 90-day CAA. One black 55-gallon container of Waste Paint Related Material labeled D001, F003, F005, with the flammable liquid hazard indicator, and dated January 8, 2025 (Pictures 13-14). Next to the CAA was a solvent recovery area that had not been used for several years. The inspectors observed containers of lubricant oil, and two solvent recovery stills that needed repair (Pictures 12, 13, 14, 15). Mr. Young stated that the parts for stills were being ordered.

Outside the Paint Mixing Room was a white 55-gallon container of paint waste. The container was not closed and held paint debris and empty paint containers with dried paint residue (Pictures 16-17). The inspectors asked Mr. Young, Mr. James Williams, Paint Booth Technician, and Mr. Troy Hahn, Maintenance Manager and were told that the dried paint residue was from the air-dry paint that was non-hazardous. The inspectors also observed a solvent rinse pot used to clean paint guns (Picture 18). The solvent was still in use, and Mr. Hahn explained that the dirty solvent is added to the CAA container for disposal.

Outside the Paint Area was the paint filter storage. The inspectors observed fourteen wooden

pallets of used paint filters and paint debris for disposal (Pictures 19-20). Mr. Young explained that the spent paint filters from the air-dry paint process were non-hazardous and had been analyzed.

Next to the pallets were two trash roll-offs for solid waste. The inspectors observed paint debris from the pallets in one of the roll-offs (Pictures 21-22). No hazardous waste was observed in this area.

The inspectors walked the paint line and observed two 5-gallon used oil containers on a secondary containment pallet. One of the containers was empty and the other container was not closed or labeled (Picture 23).

Pursuant to ADEM Admin. Code r. 335-14-17-.03(4)(a)1. Used oil generators shall not store used oil in units other than used oil tanks, containers, or units subject to regulation under Chapters 335-14-5 and 335-14-6. A container holding used oil must always be closed during storage, except when it is necessary to add or remove used oil.

Pursuant to ADEM Admin. Code r. 335-14-17-.03(4)(c)1. [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

Dunbarton manages a satellite accumulation area (SAA) in the Ransburg #1 paint line area. The paint line generates hazardous waste paint related material. The inspectors observed two black 55-gallon containers in this SAA. Only one container had hazardous waste inside, and the container was located by the Ransburg #1 paint line. The container was equipped with a flat lid with a ring, which was not closed and had a paint gun inside (Pictures 24-27). The drum was marked and labeled D001, F003, F005 hazardous waste paint related material, and identified with a flammable hazard. Mr. Young explained that the container held solvent flush, from dumping 5-gallon containers into the 55-gallon container. The solvent flush was being used to clean the paint gun between paint changeovers. However, no one was actively working in the area, and the container was open at the time of the inspection.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)4 [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

Across from the solvent flush SAA was a blue 55-gallon container. The container was equipped with a flat lid with a ring and a red funnel attached to the bung hole and was closed (Pictures 28-29). The drum was marked and labeled D001, F003, F005 hazardous waste paint related material, and identified with a flammable hazard.

Warning for potential excess of 55 gallons: Although Dunbarton may manage more than one container in the same SAA, please note that the SAA Permit Exemption limits the total volume of waste accumulated in this area at any given time to be no more than 55 gallons. Pursuant to

ADEM Admin. Code r. 335-14-3-.01(5)(a)6 [40 C.F.R. § 262.15(a)(6)], a generator who accumulates hazardous waste in excess of 55 gallons must, with respect to that amount of excess waste, comply with ADEM Admin. Code r. 335-14-3-.01(7)(a) [40 C.F.R. § 262.17(a)] or remove the excess waste from the SAA within three consecutive calendar days.

Dunbarton manages a SAA in the paint line filter wall primer area. This area of the paint line generates hazardous waste paint related material from air dry painting. The inspectors observed one black 55-gallon container in this SAA. The container was equipped with a ringed flat lid with a funnel in the bung hole, which was closed (Pictures 30-32). The drum was marked and labeled D001, F003, F005 hazardous waste paint related material, and identified with a flammable hazard indicator. The inspectors also observed the paint filters in use and were told the filters absorbed the overspray and were changed daily.

11.3 Maintenance

The inspectors toured the maintenance area and observed a parts washer using a non-hazardous detergent, aerosol cans in the flammable cabinets and on the maintenance carts, some without spray nozzles but still in use. Mr. Young checked the loft area for universal waste lamps and batteries. No universal waste was being generated at that time. No hazardous waste was observed in the area.

12) Records Review

Contingency Plan and Quick Reference Guide (QRG):

The actions that facility personnel should take in response to an emergency are described in the facility's Dunbarton Corporation Emergency Action Plan which was last updated on July 29, 2024. The Hazardous Waste Contingency Plan and Quick Reference Guide was last updated March 8, 2024.

The plans describe actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

The plans describe arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or the Local Emergency Planning Committee.

The plans list the names and emergency telephone numbers for persons identified as emergency coordinators. The primary emergency coordinator is listed, and the other individuals are listed in the order in which they will assume responsibility as alternates.

The plans do not include a list of all emergency equipment at the facility. The list should include fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. The plans do not include the location and a physical description of each item on the list, and a brief outline of its capabilities.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)6 [40 C.F.R. § 262.17(a)(6)], which

incorporates ADEM Admin. Code r 335-14-3-.14(9)(e) [40 CFR 262.261(e)], and is a condition of the LQG permit exemption, the plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

The plans include an evacuation plan for personnel. These plans describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes. However, the evacuation map that was observed on the production floor was not included in the contingency plan.

A copy of the Hazardous Waste Contingency Plan (and its quick reference guide) has not been submitted to the police department, fire department, hospital, State and local emergency response teams and the Local Emergency Planning Committee.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)6 [40 C.F.R. § 262.17(a)(6)], which incorporates ADEM Admin. Code r. 334-14-3-.14(7) [40 C.F.R. § 262.256], and is a condition of the LQG Permit Exemption, a generator must: (a) attempt to make arrangements with the local authorities identified, as appropriate for the type of waste handled at the Facility and the potential need for the services of these authorities, and (b) maintain records documenting the arrangements made.

The quick reference guide includes the types/names of hazardous waste in layman's terms and the associated hazard associated with each hazardous waste present at any one time; the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; and the identification of on-site notification systems; and the name of the emergency coordinator(s) and emergency telephone number(s).

The quick reference guide does not include the estimated maximum amount of each hazardous waste that may be present at any one time; a map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; a street map of the facility in relation to surrounding businesses, schools and residential areas; and the locations of water supply.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates ADEM Admin. Code r. 334-14-3-.14(10)(b)(2),(4)-(6) [40 C.F.R. § 262.262(b)(2),(4)-(6)] and is a condition of the LQG Permit Exemption, a large quantity generator that first becomes subject to these provisions after May 30, 2017 or a large quantity generator that is otherwise amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders identified at paragraph (a) of this section or, as appropriate, the Local Emergency Planning Committee. The quick reference guide must include the following elements:

(2) The estimated maximum amount of each hazardous waste that may be present at any one

time;

(4) A map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes;

(5) A street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers;

(6) The locations of water supply (e.g., fire hydrant and its flow rate);

Please note that ADEM Admin. Code r. 334-14-3-.14(10)(b) [40 C.F.R. § 262.262(b)] requires an LQG that is amending its contingency plan to submit a quick reference guide of the contingency plan to the local emergency responders. The required contents of the contingency plan are specified in ADEM Admin. Code r. 334-14-3-.14(9) [40 C.F.R. § 262.261], and the required contents of the quick reference guide are specified in ADEM Admin. Code r. 334-14-3-.14(10)(b) [40 C.F.R. § 262.262(b)].

Training Records

The inspectors reviewed facility job descriptions and employee names that were provided for Paint Technician and Team Leader-Paint. Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position.

Dunbarton provided a written description of the type and amount of both introductory and continuing training to be given to each person filling the positions listed above. The inspectors reviewed records of employee hazardous waste training completed in 2022 and 2024. However, annual Hazardous Material Awareness and Operations training was not available for three employees with the job title Paint Technician in 2022 and 2023. Mrs. Coleman explained that these employees do not handle hazardous waste and thus did not need the annual training. The inspectors suggested differentiating the Paint Technician job that handles hazardous waste from the position that does not.

Waste Manifest and Land Disposal Restriction (LDR) Records

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent since January 2022. Hazardous waste manifest records show that D001, F003, F005 hazardous waste Spent Solvent, Mixture Paint and Solvent are routinely shipped to Clean Earth of Alabama, Inc. (EPA ID ALD981020894), and Allworth, Inc. (EPA ID ALD094474793) and the most recent shipment was made in 2024. Used oil and oily rags were shipped to VLS Armor (EPA ID TND981920119) and Oil Recovery, Inc. (GAR000054460).

The facility's records did not include a signed return copy of hazardous waste manifest number 020043237FLE for a shipment of D001, F003, F005 hazardous waste Spent Solvent, Mixture Paint and Solvent to Clean Earth of Alabama, Inc. (EPA ID ALD981020894) on November 7, 2024. No records were provided to show that Dunbarton contacted the transporter or the owner or operator of the designated facility to determine the status of this waste, and Dunbarton did not submit exception reports for these missing manifests.

Pursuant to ADEM Admin. Code r. 335-14-3-.04(3)(a)(1)-(2) [40 C.F.R. § 262.42(a)(1)-(2)], (1) a large quantity generator who does not receive a copy of the manifest with the signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste. (2) A large quantity generator must submit an Exception Report to the EPA Regional Administrator for the Region in which the generator is located if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 60 days of the date the waste was accepted by the initial transporter. The Exception Report must include:

- (i) A legible copy of the manifest for which the generator does not have confirmation of delivery;
- (ii) A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts.

Weekly Inspection Records

The inspectors reviewed Dunbarton's available records of inspections of the hazardous waste central accumulation area since January 2022. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The records include the date and time of the inspection and the name, signature and initials of the employee conducting the inspection. Employees do routinely record inspection observations and subsequent follow-up actions on the inspection log.

Waste Determination Records

The inspectors reviewed Dunbarton's waste profile for Paint Filter – Used (Pictures 33-37). The sample was collected on August 16, 2023, and the Toxicity characteristic leaching procedure (TCLP) results provided on August 29, 2023, by Poly/LRS, Inc. were non-detect.

Biennial Report

The biennial reports for 2021 and 2023 were provided for review. No issues were noted.

Waste Minimization Plan

The inspectors requested the waste minimization plan and Mrs. Coleman and Mr. Young explained that due to ADEM's requirement the facility was not required and had not developed a plan. The inspectors recommended documenting the current and upcoming practices (i.e., recycling solvent once the still is repaired, the collecting of the metal cut outs to be recycled, laundering of the oily rags, etc.) and be included in a plan.

13 Closing Conference

The inspectors conducted the exit meeting around 3:00 PM with Mrs. Coleman, Mr. Young and Mr. Cannon. During this meeting, the inspectors stated their preliminary conclusions of the inspection. Dunbarton agreed to provide any corrections via email.

On March 5, 2025, via email Mrs. Coleman provided the following with attachments:

- Emergency Action Plan, Hazardous Communication and Quick Reference Guide – Updated with current contact information, evacuation routes, and confirmation from local

authorities they have received our plans. We have also conducted training for all Dunbarton employees on our Emergency Action Plan and evacuation station leaders to ensure all understand their roles and responsibilities in the event of evacuation.

- HAZWOPPER Training is scheduled for Wednesday, March 12 for: All ERT members, 3 – Paint room employees, 1 – Paint Manager, 1 – Maintenance employee and 1 – Maintenance Manager. This training is offsite and facilitated by a 3rd party – Posey Environmental. Certificates can be forwarded to you once we receive them.
- Attached is the November 2024 shipment manifest that wasn't in the file. Our consultant had it. She was working on reports to be submitted.
- The 5-gallon bucket of hydraulic oil that wasn't labeled has been removed.
- Used Oil Area:
 - The 55-gallon drum has been removed and discarded.
 - The oil catch pen now has a label designating it as used oil.

14) List of Attachments

Attachment A – Photo Log: Dunbarton Corporation Rediframe Division

14) Signed

PAULA WHITING

Paula A. Whiting
Environmental Engineer

 Digitally signed by PAULA WHITING
Date: 2025.03.13 11:39:45 -04'00'

16) Concurrence

ARACELI CHAVEZ

Araceli Chavez
Chief
RCRA Enforcement Section

 Digitally signed by ARACELI CHAVEZ
Date: 2025.03.13 12:08:03 -04'00'

Attachment 1 – Photo Log

37 Photos taken on: **January 14, 2025**

Photos taken by: **Paula A Whiting**

Photos taken with: **Olympus Tough**

EPA Property Tag: **SC7374**



Picture 1 – Press brake machine oil release



Picture 4 – Used Oil Drum Storage unmarked secondary containment



Picture 2 – Press brake machine oil release



Picture 5 – Used Oil Drum Storage secondary containment



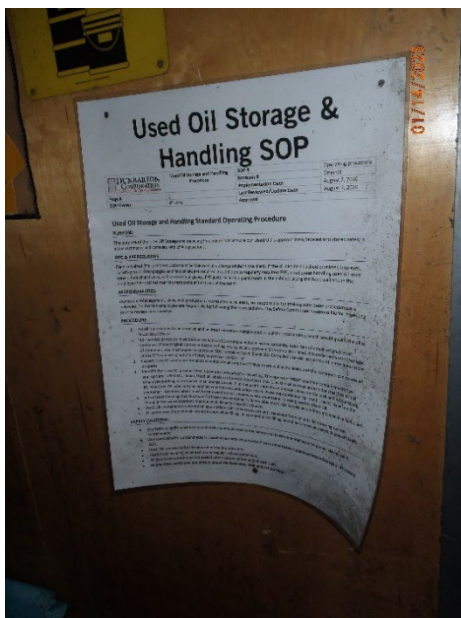
Picture 3 – Used Oil Drum Storage



Picture 6 – Used Oil Drum Storage open container



Picture 7 – Used Oil Drum Storage oil release and open lid



Picture 8 – Used Oil Drum Storage



Picture 10 – Filter Receiving universal waste aerosol cans



Picture 11 – Paint Area solvent recovery still pending repair



Picture 9 – Filter Receiving universal waste aerosol cans



Picture 12 – Paint Area CAA



Picture 13 – Paint Area CAA container label



Picture 16 – Paint Area air dry paint waste container



Picture 14 – Paint Area solvent recovery still pending repair



Picture 17 – Paint Area paint gun solvent rinse pot



Picture 15 – Paint Area air dry paint waste container



Picture 18 – Outside Used Paint Filter Storage



Picture 21 – Outside Used Paint Filter Storage – trash roll-off



Picture 19 – Outside Used Paint Filter Storage - debris



Picture 22 – Paint Area used oil container not closed or labeled



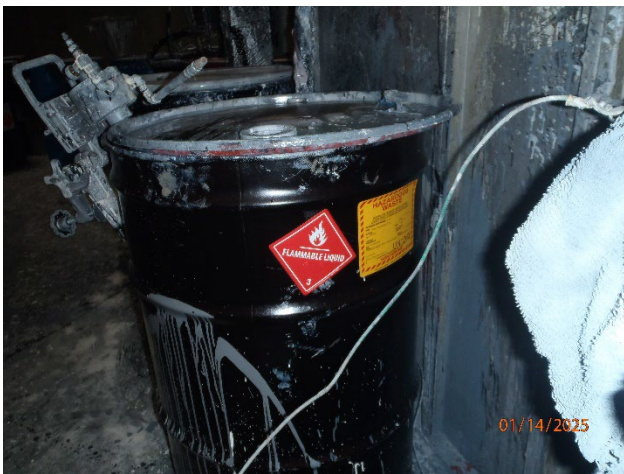
Picture 20 – Outside Used Paint Filter Storage – trash rolloff with discarded paint filter



Picture 23 –Paint Area SAA containers



Picture 24 – Paint Area SAA container open



Picture 25 – Paint Area SAA container open



Picture 26 – Paint Area SAA container



Picture 27 – Paint Area SAA container



Picture 28 – Paint Area SAA container label



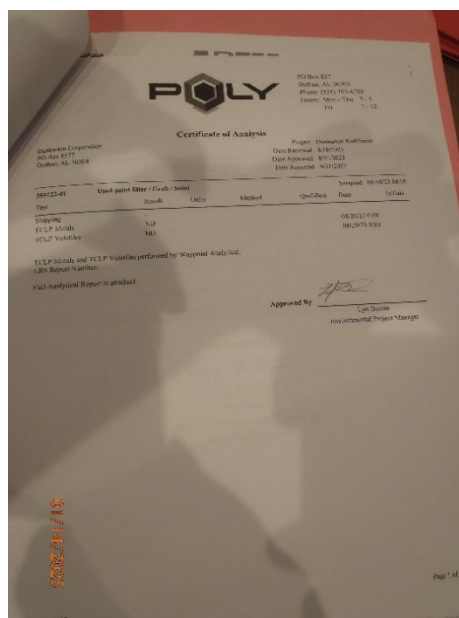
Picture 29 – Paint Area Filter Wall SAA



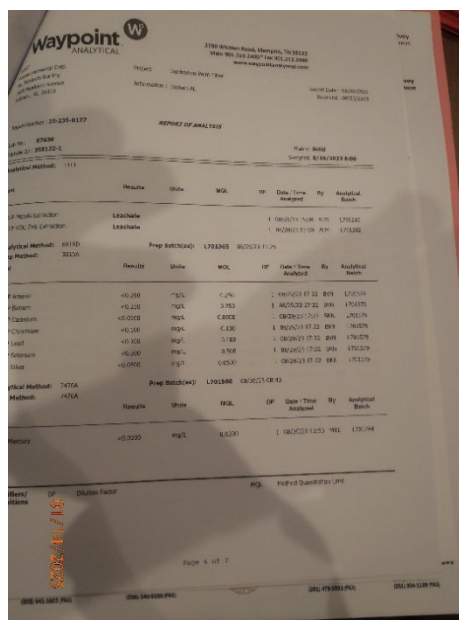
Picture 30 – Paint Area Filter Wall SAA label



Picture 31 – Paint Area Filter Wall SAA



Picture 32 – Paint Filter Waste Profile



Picture 33 – Paint Filter Waste Profile

