

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

Energy Manufacturing Co., Inc.

7 Plastic Lane

Monticello, IA 52310

(319) 465-3537

EPA ID Number: IAD984590794

On

February 3, 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 Energy Manufacturing Co., Inc. (EMC) in Monticello, Iowa on February 3, 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

Energy Manufacturing Co Inc.:

Jason Dunbar, Plant Manager

Brian Latusick, Human Resource Manager

EPA Representative, ERG:

Janosh Wolters, Energy Engineer

3.0 INSPECTION PRECEDURES

After arriving unannounced at EMC at approximately 09:35, 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 General Manager, Joe Zarzewski. I explained my reason for being on site is to conduct a RCRA CEI and asked to meet with the facility personnel who manage hazardous waste on site. Mr. Latusick and Mr. Dunbar then greeted me at the facility entrance and led me to a conference room to begin the opening conference at approximately 09:45. I initiated the opening conference with Mr. Dunbar and Mr. Latusick as EMC's representatives. I presented Mr. Dunbar and Mr. Latusick 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. Dunbar and Mr. Latusick with a copy of the *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections* and reviewed EMC's confidentiality rights. I informed Mr. Dunbar and Mr. Latusick 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. Dunbar provided a facility layout which was an AUTOCAD drawing of the entire facility and manufacturing equipment. Although the AUTOCAD drawing was taken off site, it does not clearly show the areas I visited during the visual inspection. For more clarity, a Google Earth image was taken and added to the facility layout for this report (see Attachment 1). Mr. Dunbar and Mr. Latusick explained facility operations and locations of hazardous waste generation and management.

During the visual inspection of the facility, Mr. Dunbar and Mr. Latusick 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 and one CAA. At the time of the inspection, the facility was not managing waste lamps and waste batteries as universal wastes. See section 4.8 of this report for more information. EMC does not utilize any parts washers on site. All parts are washed in small fully contained wash bays and nonhazardous wastewater is generated. I conducted an in-depth visual inspection of the SAAs, the CAA, used oil storage area, and all manufacturing areas.

Four photographs were collected as inspection documentation and are shown in Attachments 2 and 3. 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. At the conclusion of the inspection, I provided Mr. Latusick with a *Confidentiality Notice*, *Receipt for Documents and Samples*, and a *Notice of Preliminary Findings* which he signed as acknowledgement of receipt (see Attachments 5, 6, and 7 respectively). No confidentiality claims were made by EMC.

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

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

EMC began operating in 1978 and currently employs approximately 103 people. The facility operates on a three, eight-hour shift operation with varying start times from Sunday through Friday. The facility has a footprint of approximately 115,000 square feet. EMC operations consist of manufacturing the outside of steel hydraulic cylinders. The major raw materials received on site are steel, pre-manufactured chrome rods, iron, paint, and solvents. The major manufacturing or processing operation that generates waste streams include metal cutting, welding, grinding, machining, metal cleaning, and painting. The following waste streams are produced: waste paint related material, paint booth filters, scrap metal, wastewater, machine coolant, used oil, used oil filters, shop rags, and general trash.

4.2 RCRA Status

According to the *Hazardous Waste Site Info Verification Report for Inspector* (see Attachment 7), EMC notified as a federal Very Small Quantity Generator (VSQG) of hazardous waste and did not list any waste codes. I asked Mr. Latusick to review the *Hazardous Waste Site Info Verification Report for Inspector*, which I provided prior to reviewing records and performing the visual inspection of the waste generation areas. Mr. Latusick requested the facility contact be updated to himself. After reviewing the records and walking through the facility, I determined

that the facility is operating as a federal Small Quantity Generator (SQG) of D001, D035, and F005 hazardous waste, a generator of used oil, and could potentially become a small quantity handler (SQH) of universal waste. Based on my review of facility records, it appears the facility has been operating as a SQG of hazardous waste for the last three years. I asked Mr. Latusick if the facility has submitted an updated *EPA Form 8700-12* to EPA. Mr. Latusick stated the facility did not submit an updated form to EPA. I explained to Mr. Latusick that as a SQG, EMC would be required to re-notify EPA of hazardous waste activity every four years beginning by September 1, 2021 and every four years thereafter. Mr. Latusick stated the facility was not aware of this requirement. Therefore, I left the following finding:

NOPF 2 – Failure to renotify EPA of hazardous waste activity every 4 years by September 1, 2021. [40 CFR 262.18(d)(1)].

EMC generates more than 100 kilograms, but less than 1,000 kilograms of hazardous waste monthly based on a review of facility records, a visual inspection of process and waste management areas, and interviewing personnel.

EMC has not been previously inspected for RCRA compliance.

4.3 Facility Waste Streams and Management

A Waste Stream and Waste Handling Table for EMC is presented below. The table describes waste streams generated, generation process and 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	Waste Paint Related Material (Waste Profile included in Attachment 9)	Painting operations	D001, D035, F005 (based on process knowledge and knowledge of the product)	Two 55-gallon containers per month	55-gallon containers in SAAs before being transferred to the CAA	Hydrite Chemical in Waterloo, IA (IAT200010593) to Coal City Cob Company Inc. in Waxahachie, Texas (TXR000079839) to WRR Environmental Services in Eau Claire, WI (WID990829475) for fuel blending
2	Paint Booth Filters	Painting operations	Nonhazardous (based on process knowledge and knowledge of the product)	Changed out approximately every six to eight weeks	40-yard container	Waste Management in Cedar Rapids, IA to Jones County Landfill in Jones County, IA for landfill
3	Scrap Metal	Facility operations	Nonhazardous (based on process knowledge and knowledge of the product)	All scrap metal containers picked up approximately every one to two weeks	Two 10-yard, two 20-yard, and one 40-yard container	Alter Metal Recycling in Cedar Rapids, IA for recycling
4	Cleaning Wastewater/ Machine Coolant	Spent machine coolant	Nonhazardous (based on process knowledge and knowledge of the product)	1,300 gallons per month	225-gallon containers	Covanta Environmental Solutions in Cedar Rapids, IA (IAR000510438) for treatment

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
9	Used Oil	Quality control testing on hydraulic cylinders and facility maintenance	Exempted (managed as used oil per 40 CFR 279)	225 gallons every other month	225-gallon container	Covanta Environmental Solutions in Cedar Rapids, IA (IAR000510438) for treatment
10	Used Oil Filters	Punctured and hot drained oil filters	Excluded/hot a solid waste (based on process knowledge and management practices)	One 55-gallon container per year	Added to general trash 40-yard container	Waste Management in Cedar Rapids, IA to Jones County Landfill in Jones County, IA for landfill
12	Waste Lamps	Facility maintenance	Nonhazardous (based on process knowledge and knowledge of the product)	Unknown - not tracked but Mr. Dunbar estimated less than 4-foot container per year	Added to general trash 40-yard container	Waste Management in Cedar Rapids, IA to Jones County Landfill in Jones County, IA for landfill
	NOPF 1 – Failure to make an adequate waste determination. [40 CFR 262.14(a)(2)→262.11(a)]. For more information on why this finding was left with the facility, see Section 4.8 of this report.					
13	Waste Batteries	Facility maintenance	Nonhazardous (based on process knowledge and knowledge of the product)	Unknown - not tracked but Mr. Dunbar estimated less than one 5-gallon container per year	Added to general trash 40-yard container	Waste Management in Cedar Rapids, IA to Jones County Landfill in Jones County, IA for landfill
	NOPF 1 – Failure to make an adequate waste determination. [40 CFR 262.14(a)(2)→262.11(a)]. For more information on why this finding was left with the facility, see Section 4.8 of this report.					

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
14	Shop Rags	Wiping excess MEK off painted products	Determined to be nonhazardous by the facility based on process knowledge and knowledge of the product.	Unknown – not tracked and added to general trash waste stream	General trash cans and added to 40-yard container	Waste Management in Cedar Rapids, IA to Jones County Landfill in Jones County, IA for landfill
	NOPF 1 – Failure to make an adequate waste determination. [40 CFR 262.14(a)(2)→262.11(a)]. See Section 4.6 for additional information leading to the issuance of the NOPF.					
15	General Trash	Facility operations	Nonhazardous (based on process knowledge and knowledge of the product)	40-yard container	40-yard container	Waste Management in Cedar Rapids, IA to Jones County Landfill in Jones County, IA for landfill

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

EMC has one Less-Than-180-Day CAA on site as labeled on the facility layout (see Attachment 1). I visually inspected the CAA during the visual inspection. I observed one 55-gallon container of hazardous waste (see Attachment 3, Photo 2). The 55-gallon container was full of waste paint related material hazardous waste. The accumulation date on the container in a CAA was December 23, 2021. December 23, 2021 is within 180 days from the time of the inspection.

The Less-Than-180-Day CAA container observed in the CAA was closed, in good condition, labeled with the indication of the nature of the hazard, labeled with an accumulation start date, and labeled with the words “Hazardous Waste”.

Within the CAA, I observed adequate aisle space to allow for container inspections and access in the event of a spill. At the time of the inspection, waste paint related material was the only hazardous waste I observed in the CAA. I observed a fire extinguisher, spill control equipment, and related safety equipment near each CAA. Operators handling hazardous waste, placing SAA containers into the CAA, or managing hazardous waste at EMC, are trained to use their two-way radio system in case of emergencies. I asked Mr. Latusick if the facility inspected the CAA. Mr. Latusick stated the facility has employees in the area daily, but EMC does not formally inspect the area weekly. Mr. Latusick stated the facility assumes an employee would notice any issues that would arise because employees are in the area daily. I explained to Mr. Latusick that as a SQG, the facility would need to inspect the CAA ensuring all requirements are met per 40 CFR 262.16(b)(2)(iv). The facility did not appear to conduct weekly inspections of the CAA. Therefore, I left the following finding:

NOPF 3 – Failure to inspect CAA weekly. [40 CFR 262.16(b)(2)(iv).]

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

4.5 Satellite Accumulation Areas

I observed two SAAs 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	Primer Paint Booth	Waste Paint Related Material	15 gallons	55-gallon drum
2	Topcoat Paint Booth	Waste Paint Related Material	10 gallons	55-gallon drum

During the visual inspection, I observed two SAAs on site. The facility’s largest hazardous waste stream is waste paint related material. SAA #1 and SAA #2 each use a 55-gallon container to accumulate hazardous waste paint related material (see Attachment 3, Photo 3).

The SAA containers were in good condition, closed, labeled with the indication of the nature of the hazard, and labeled with the words “Hazardous Waste”.

I reviewed the management of both SAAs, and no issues or findings were noted.

4.6 Painting Operations

During the visual inspection, the facility had two small paint booths (see Attachment 3, Photo 4). One paint booth was used for primer and the second was used for topcoat. The facility generated waste paint related material that is managed in 55-gallon SAAs as discussed in Section 4.5 of this report. The waste profile for this waste is provided in Attachment 9. I observed two aerosol cans of paint in the painting booth area. I asked Mr. Latusick if any aerosol cans are generated on site. Mr. Latusick stated aerosol cans are used for touch up painting operations. Mr. Latusick explained cans are used until RCRA empty and then added to general trash containers. Mr. Latusick explained if a can breaks, the can would be managed as a hazardous waste. I asked if any rags are generated in the painting operation. Mr. Latusick explained paint operators use rags with a small amount of solvent to wipe off imperfections on hydraulic cylinders as needed prior to painting occurs. Mr. Latusick stated the rags do not contain free liquids when added to general trash containers. I asked Mr. Latusick what type of solvent the facility uses for this operation. Mr. Latusick stated the facility uses MEK. During records review, I reviewed the SDS for MEK which is provided in Attachment 10. Mr. Latusick explained the facility believed the rags to be a nonhazardous waste and were managing them as such. I explained to Mr. Latusick based on the type of solvent the facility uses for this operation, the rags would be considered a hazardous waste and therefore, would need to be managed as a hazardous waste. Mr. Latusick stated he understood and at the time the waste determination was made, he was unaware they would be considered a hazardous waste. I explained to Mr. Latusick that if the facility were to follow all requirements set forth in 40 CFR 261.4(a)(26), the facility could manage this waste under this exclusion. At the time of the inspection, the facility appeared to be managing a D001, D035, F005 hazardous waste as a nonhazardous waste. Therefore, I left the following finding:

NOPF 1 – Failure to make an adequate waste determination. [40 CFR 262.14(a)(2)→262.11(a)].

The facility generates paint booth filters from painting operations. Mr. Latusick explained that paint booth filters are completely dry and do not contain any free liquids at the time of disposal. Mr. Latusick stated the facility puts waste paint booth filters in the facility’s general trash. Mr. Latusick stated the facility used process knowledge to determine the waste was nonhazardous. I asked Mr. Latusick if the facility conducted any analytical testing on the paint booth filters to substantiate the facility’s claim that the waste is nonhazardous. Mr. Latusick stated only process knowledge was used to make this determination. However, solvents are not sprayed into the filters and only paint is captured in the filters.

I reviewed the management of the paint booths, and no additional issues or findings were noted.

4.7 Wastewater and Coolant Waste

During the visual inspection, Mr. Dunbar explained that manufactured parts are cleaned in fully contained wash machines approximately two feet wide by six feet high. Hydraulic cylinders are placed within these machines and rinsed with a water-based cleaning solution. Eventually the solution needs to be changed when it can no longer properly clean the part. Spent solution is accumulated in 225-gallon containers. Mr. Dunbar explained that all spent cleaning solution is shipped off site with Covanta Environmental Solutions (Covanta) in Cedar Rapids, IA. The SDS for the cleaning solution is provided in Attachment 11. Mr. Dunbar stated the facility used process knowledge and knowledge of the constituents shown in the SDS to make an adequate waste determination.

In addition, Mr. Dunbar stated machine coolant that is drained during maintenance is also added to the same 225-gallon containers. The coolant is a nonhazardous coolant. The SDS for the coolant is provided in Attachment 12. Mr. Dunbar stated the manufactured parts being cleaned should not contain chrome that would then be introduced in the coolant waste stream. Mr. Dunbar stated the facility believes that at one point in time, Covanta took analytical samples for this waste stream. Mr. Dunbar was unable to provide any analytical testing results at the time of the inspection. Based on the records available during the inspection, it appeared this waste stream was nonhazardous. Upon further EPA review, additional information on this waste stream may be requested. Mr. Dunbar explained when Covanta transports the wastewater/coolant off site, it is manifested on a nonhazardous waste manifest. An example of this manifest is provided in Attachment 13.

I asked Mr. Dunbar if the facility discharges any wastewater via sanitary sewer. Mr. Dunbar stated within the last month, the facility has begun working with the City of Monticello Publicly Owned Treatment Works (POTW) facility to renew their discharge permit. Mr. Dunbar stated the POTW recently lost record of the facility's discharge permit and Mr. Dunbar stated he could not locate it at the time of the inspection. Mr. Dunbar stated within the last month, EPA and IDNR have been working with the POTW to resolve some water contamination from a truck stop near the facility. Mr. Dunbar stated the only wastewater that is discharged via sanitary sewer currently is a 100 percent rinse water sprayed onto manufactured parts after they are removed from the cleaning machines. At the time of the inspection, I was unable to obtain any additional information. Upon further EPA review, EPA may request additional information regarding the facility's wastewater discharge agreement with the POTW.

I reviewed the management of the facility's wastewater from the manufacturing processes and no issues or findings were noted.

4.8 Waste Lamps and Batteries

During the visual inspection, I asked Mr. Dunbar and Mr. Latusick if the facility generated waste batteries and lamps. Mr. Dunbar stated the facility has converted to approximately 75 percent

LED lights and the only batteries that would be generated would be from smaller power tools. I asked Mr. Dunbar how these wastes are managed. Mr. Dunbar stated the facility throws waste lamps and waste batteries in the general trash. I asked Mr. Dunbar how many waste batteries and lamps the facility generates per year. Mr. Dunbar stated the facility does not track the amount, but he would estimate less than 180 bulbs of waste lamps and less than one filled 5-gallon container of waste batteries per year. Mr. Dunbar explained that the facility is currently in discussions with their corporate staff to manage waste lamps and batteries as universal waste. In addition, I explained if the facility is going to manage these wastes as universal wastes, the facility needs to review the requirements in 40 CFR 273 to ensure complete compliance. Mr. Dunbar stated the facility would implement management practices to ensure these wastes are managed and disposed of as universal wastes in accordance with 40 CFR 273 moving forward. Based on Mr. Dunbar's response, it appeared the facility did not make a waste determination for the waste batteries or waste lamps. Therefore, the following finding was left with the facility:

NOPF 1 – Failure to make an adequate waste determination. [40 CFR 262.14(a)(2)→262.11(a)].

4.9 Used Oil

I visually observed the facility's used oil storage area located in the southern portion of the facility as labeled on the facility layout (see Attachment 1). I observed one 225-gallon of used oil container. The used oil container held approximately 180-gallons of used oil. Mr. Dunbar stated used oil is generated primarily from quality checks on manufactured hydraulic cylinders. The container was closed, labeled "Used Oil", and in good condition. Covanta hauls all used oil off site for recycling.

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

4.10 Other Regulatory Requirements

Preparedness, Prevention, and Emergency Requirements - Safety and emergency equipment were present and in satisfactory condition in areas throughout the facility, including along the southern wall directly next 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, I determined the employees are familiar with waste handling and emergency procedures. The employees appeared to be aware of RCRA regulations but could be more knowledgeable with universal waste regulations. EPA may add additional findings regarding the facility's management of waste lamps and batteries.

Manifest and Land Disposal Restriction (LDR) Requirements – EMC maintained records of manifests on site at the time of inspection dating back three years. I reviewed the 21 manifests from the last three years. Examples of manifests and LDR forms are provided in Attachment 14.

I reviewed all other manifest and LDR requirements and no issues or findings were noted.

5.0 SUMMARY OF FINDINGS

NOPF 1 – Failure to make an adequate waste determination. [40 CFR 262.14(a)(2)→262.11(a)].

The facility was not managing waste lamps and waste batteries as universal wastes at the time of the inspection. Mr. Dunbar stated the facility did not determine the wastes to be a hazardous waste and that EMC did not manage the waste lamps or batteries as a universal waste.

In addition, during painting operations, MEK contaminated rags are generated at the facility. Mr. Latusick stated the rags do not contain free liquids when added to general trash containers. At the time of the inspection, the facility appeared to be managing a D001, D035, F005 hazardous waste as a nonhazardous waste.

NOPF 2 – Failure to renotify EPA of hazardous waste activity every 4 years by September 1, 2021. [40 CFR 262.18(d)(1)].

EMC did not re-notify EPA of hazardous waste activity every four years beginning by September 1, 2021 and every four years thereafter. Based on my review of records during the inspection, the facility appeared to be operating as a SQG for last three years.

NOPF 3 – Failure to inspect CAA weekly. [40 CFR 262.16(b)(2)(iv).]

During the visual inspection, I asked Mr. Latusick if the facility inspected the CAA. Mr. Latusick stated the facility has employees in the area daily, but EMC does not formally inspect the area weekly.

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

Janosh
Wolters

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Janosh Wolters
Date: 2022.03.28
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Janosh Wolters
Energy Engineer
Date: March 28, 2022

AMBER
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Date: 2022.03.31 19:51:55
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Amber Whisnant
Section Chief
ECAD/CB/RCRA, EPA Region 7
Date: _____

Attachments:

1. Facility Layout (2 pages)
2. Energy Manufacturing Co Inc. Photolog (1 page)
3. Energy Manufacturing Co Inc. Photos (4 photos/5 pages)
4. EPA Inspection Checklist (24 pages)
5. Confidentiality Notice (1 page)
6. Receipt for Documents and Samples (1 page)
7. Notice of Preliminary Findings (1 page)
8. Hazardous Waste Site Info Verification Report for Inspector (1 page)
9. Waste Paint Related Material Waste Profile (2 pages)
10. MEK SDS (13 pages)
11. Wash Solution SDS (3 pages)
12. Coolant SDS (4 pages)
13. Covanta Manifest (1 page)
14. Manifest (1 page)

Notice of Preliminary Findings

(For Contractor Use Only)

Facility Name: Energy Manufacturing Co Inc.
Facility Address: 7 Plastic Lane Monticello, IA 52310

EPA ID#: IAD984590794 Date: 02/03/2022

Notice: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for the EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to the EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and will make determinations as to what violations may have occurred at your facility.

Citation

Description of Finding

- | | |
|------------------------------------|---|
| 1. 40 CFR 262.14(a)(2) → 262.11(a) | 1. Failure to make an adequate waste determination. |
| 2. 40 CFR 262.18(d)(1) | 2. Failure to reassess notify EPA of hazardous activity by September 1, 2021 and every 4 years thereafter. |
| 3. 40 CFR 262.16(b)(2)(iv) | 3. Failure to inspect CAA at least once per week. |
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If you have any questions about this Notice or wish to discuss your response, you may call me at 484-678-8675, or Trevor Urban (Compliance Officer) at 913-551-7133.

This Notice prepared by Janosh Walters Date: 02/03/2022

The undersigned person hereby acknowledges receipt of this Notice and has read the same.

Printed Name: Brian Latusick Date: 02-03-2022
Signature: [Signature]
Title: Human Resources Manager