REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

Holland Nameplate

1300 Burlington Street
North Kansas City, Missouri 64116
EPA ID Number: MOR000552356

On

June 25, 2024

By

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

1.0 INTRODUCTION

I performed a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Holland Nameplate (Holland), located in North Kansas City, Missouri, on June 25, 2024. 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 Large Quantity Generator (LQG) of hazardous waste. Holland was last inspected for RCRA compliance on January 8, 2020, by the State of Missouri. MDNR issued a Letter of Warning on January 23, 2020, noting 13 violations which required action by the facility.

2.0 PARTICIPANTS

Holland Nameplate (Holland):
Chris Bray, Compliance Manager/Production Manager
Bob McCarthy, President
Shawn Colvin, Estimator/Compliance (in training)

Missouri Department of Natural Resources (MDNR):
Jake Huff

U.S. Environmental Protection Agency (EPA):
Marc Matthews, Environmental Engineer, ECAD (Lead Inspector)
Donald Melton, Physical Scientist, ECAD

3.0 INSPECTION PROCEDURES

MDNR was notified prior to the inspection and the state had Mr. Huff accompany Mr. Melton and me for the inspection.

Prior to meeting the other inspectors, I conducted a drive-by inspection that was only possible on the south and east sides of the facility. No apparent issues were observed.

I met with Mr. Huff and Mr. Melton at a nearby parking lot to have a brief discussion about the inspection and answer any questions. We then drove separately finding available parking around the facility.

On June 25, 2024, Mr. Huff, Mr. Melton and I arrived at the facility at approximately 8:30 a.m. From the street corner in front of the building (Attachment 1, photo 11) we proceeded to the facility entry/lobby area and asked to speak with an environmental manager. Shortly thereafter Mr. Bray greeted us and informed us that they have a regular staff meeting every morning at 8:30 and asked if we could wait for that to conclude. We agreed and he escorted us to a break room. Approximately 8:45 a.m., Mr. Bray returned to the break room and escorted us to the conference room. We provided Mr. Bray, Mr. McCarthy and Mr. Colvin with business cards and presented EPA credentials and state IDs. During the in-briefing, we notified them that this inspection would be covering the Resource Conservations and Recovery Act regulations. I presented Mr. Bray with the RCRA Facility Access Information Sheet, March 2013, which provides inspection authority. I also explained my need to collect accurate information and presented Mr. Bray with a copy of Title 18 U.S. Code, Sections 1001 and 1002. As part of the in-briefing, Mr. Bray was made aware of Holland's 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. I presented Mr. Bray with a copy of the Notification Acknowledgement/Verification Report form and asked if all information appeared to be accurate. Mr. Bray acted as the facility representatives during the on-site inspection activities.

During the inspection, discussions consisted of wastes generated and waste management practices. Documents and photographs were collected as inspection documentation (see Attachments 1, including photos 1-11, through Attachment 14).

I conducted a visual inspection of the following areas which contained RCRA regulated hazardous wastes:

Screening Area	90-day Container
RFID	Accumulation Area
Etching	Shipping and
Coherent	Fabrication

Information collected during the inspection was documented on the MDNR checklist entitled, "Large Quantity Generator Inspection Checklist". The "Universal Waste Attachment – Small Quantity Handler" and "Used Oil Attachment" checklists were not used as no universal waste nor used oil was identified on site during the inspection.

Additional information was documented in a bound field note logbook, on field sheets, and as discussed below.

At the conclusion of the inspection, I summarized the findings and recommendations with Mr. Bray. I provided Mr. Bray with a Confidentiality Notice (Attachment 4) which he signed as acknowledgement of receipt. Mr. Bray made no confidentiality claims. I provided Mr. Bray with a Receipt for Documents and Samples (Attachment 5) and Notice of Preliminary Findings (NOPF) (Attachment 6), which Mr. Bray signed as acknowledgement of receipt.

The following inspection documents were provided to 3P:

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

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

4.0 FINDINGS AND OBSERVATIONS

4.1 General Information/Facility Description and RCRA Status

Holland Nameplate operates a manufacturing facility in a 40,000 square foot building. The facility has been operating at this site since June of 2014. The facility employs 53 people, with about 5 people handling hazardous waste, working 6:00 am to 4:30 pm Monday through Thursday, and 8 pm to 6:30am Monday through Thursday. The property is bordered by Rainen Business Interiors to the north, Lutjen Inc. to the east, Judy's Bakery Cafe to the south, and Everlasting Threads to the west.

Holland Nameplate is owned by Holland 1916 Inc., which operates one other facility, Holland Interface Solutions. Holland Nameplate was previously located at 1340 Burlington Street, North Kansas City, Missouri 64116 and registered as Holland 1916 Inc.

At this facility, aluminum and stainless-steel nameplates are manufactured based on customer designs. The process involves the following basic steps: produce film for the design, attach the film to a screen, expose the screen to produce the design, rinse the screen, set up screen press, screen print, chemical etching, paint, bake, clean off, shear parts to strips, cut, form, and ship.

During this process, waste is produced from the chemical etching and clean off steps. During chemical etching, ferric chlorate, hydrochloric acid, water, and sodium chlorate are used in the process with excess removed and placed in 55-gallon plastic barrels. These barrels are maintained and labeled as ferric chloride product.

During the clean off step, the product is soaked in AS5314 for several minutes. When the solution becomes dirty, the AS5314 is switched out with clean solution. Wipes are used to clean off the metal nameplates and become contaminated. The wipes are kept in satellite empty daily kick cans and then transferred to a 55-gallon metal drum. The dirty AS5314 is kept in 55 gallon metal drums and is also kept with contaminated sure-dri and paint chips.

For additional information related to waste streams generated at the facility see the Waste Streams and Waste management section and Attachment 8 - Holland Nameplate Waste Stream Table.

Holland Nameplate is appropriately registered as a Large Quantity Generator.

4.2 RCRA Status

According to the RCRAInfo database, Holland has notified as an LQG of D001, D002, D007 & D018 characteristic hazardous waste and F003 & F005 listed hazardous waste, last notifying on February 22, 2023. See Attachment 7, 2023 Biennial Report.

Mr. Bray and I went over the Biennial Report form and he noted that no changes needed to be made to the form. Based upon the amount and type of hazardous waste generated at Holland, I inspected the facility as an LQG of hazardous waste, small quantity handler of universal waste, and used oil generator.

4.3 Previous Inspection and Related Findings

Holland was last inspected for RCRA compliance on January 8, 2019, by the State of Missouri. The 2020 MDNR Letter of Warning cited the following violations:

1. A1. Failure to register as a hazardous waste generator or maintain a current hazardous waste generator registration as a SQG/LQG, in violation of Section 260.380.1(1) RSMo and 10 CSR 25.5.262(2)(A).

2. A2. Failure to determine if waste is hazardous, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.11.

3. A6. Failure to file an updated generator registration form when information has changed, in violation of 10 CSR 25-5.262(2)(A)3.B.

4. B6. Failure to keep a storage container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks or surface impoundments separated from the other materials or protected from them by means of a dike, berm, wall or other device, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.177(c).

5. B8. Failure to conduct weekly inspections where containers are stored, looking for leaking containers and for deterioration of containers cause by corrosion or other factors, in

violation of 10 CSR 25-5.262(2)(C)2.C(I)&(II) incorporating 40 CFR 262.34(d) referencing 40 CFR 265.174.

6. B11. Failure to clearly mark and have visible for inspection on each container, the date of accumulation, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(2).

7. C.a.1. Failure to keep satellite container holding hazardous waste closed during storage, except when it is necessary to add or remove waste, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.173(a).

8. C.a.6. Failure to mark satellite accumulation containers of hazardous waste with either the words "Hazardous Waste" or with other words identifying the contents, in violation of 10 CSR 25-5.262(2)(C)3 incorporating 40 CFR 262.34(c)(1)(ii).

9. G6. Failure to maintain a personnel training plan that gives the job title for each position at the facility related to hazardous waste management and the job title and name of the employee filling each position, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(1).

10. G7. Failure to maintain a personnel training plan that gives the job description for each position at the facility related to hazardous waste management, including the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(2).

11. G8. Failure to maintain a personnel training plan that gives a written description of type and amount of introductory and continuing training that will be given to each position, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(3).

12. H6. Failure to list names, addresses and phone numbers (home and office) of emergency coordinator(s) in the contingency plan and keep the list up to date, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 30 CFR 265.52(d).

13. H7. Failure to include a list of emergency equipment at the facility including description, location, and capabilities in the contingency plan and keep the list up to date, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(e).

Items identified above with yellow highlight were repeated during the 2024 EPA inspection.

4.4 Waste Streams and Waste Management

Information related to waste streams is listed in the Waste Stream Table (Attachment 8).

4.5 Areas Visually Inspected and Related Preliminary Findings

4.5.1 Screening Area

Photo 1 depicts a 5-gallon pale containing hazardous waste was not labeled and was open at the time of inspection. The pale is used to catch drippings from the 55-gallon drum of Barsol A-1005. Miscellaneous debris was in the 5-gallon container in addition to dripping from the Barsol A-1005. The Barsol A-1005 normally would be collected and added to the product, however since other debris was in the pale, the contents of the pale were treated as a hazardous waste and placed in the proper satellite accumulation containers prior to the conclusion of the inspection.

NOPF 1 - Failure to keep satellite container holding hazardous waste closed during storage, except when it is necessary to add or remove waste, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.173(a).

NOPF 2 - Failure to mark satellite accumulation containers of hazardous waste with either the words "Hazardous Waste" or with other words identifying the contents, in violation of 10 CSR 25-5.262(2)(C)3 incorporating 40 CFR 262.34(c)(1)(ii).

4.5.2 Etching Area

Photos 2 and 3 depict two satellite containers with funnels. One was marked as "Satellite Accumulation Printing Inks" the second was not marked. Before the completion of the inspection, facility staff added a label to identify the content. See photo 8.

NOPF 2 - Failure to mark satellite accumulation containers of hazardous waste with either the words "Hazardous Waste" or with other words identifying the contents, in violation of 10 CSR 25-5.262(2)(C)3 incorporating 40 CFR 262.34(c)(1)(ii).

It was also mentioned that the full drums were in the que to be moved to the container accumulation area and will be moved prior to 3-days of becoming full.

4.5.3 Near the Coherent Area

Photo 4 depicts two satellite containers of Ferric Chloride. Neither were marked. Before the completion of the inspection, facility staff added labels to identify the contents. See photo 10.

NOPF 2 - Failure to mark satellite accumulation containers of hazardous waste with either the words "Hazardous Waste" or with other words identifying the contents, in violation of 10 CSR 25-5.262(2)(C)3 incorporating 40 CFR 262.34(c)(1)(ii).

It was also mentioned that the full drums were in the que to be moved to the container accumulation area and will be moved prior to 3-days of becoming full.

4.5.4 When we arrived at the 90-Container Accumulation Area I observed 1 55-gallon poly drum and 13 55-gallon steel drums. See photos 5, 6 and 7. All but two of the 55-gallon steel drums were dated with the start date of accumulation. The dates were printed on the tops of the drums in black ink. None of the 14 containers in the CAA were marked with a Hazardous Waste label.

NOPF 3 - Failure to clearly mark and have visible for inspection on each container, the date of accumulation, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(2).

NOPF 4 - Failure to clearly label or mark "Hazardous Waste" on each container, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3).

Upon seeing the drums without labels, I mentioned that the hazardous waste drums must not only be dated but labeled. Mr. Bray stated that their consultant informed them that the drums did not need to be labeled. I informed him that he was misinformed and began to document the area. Br. Bray continued the discussion with Mr. Melton and Mr. Huff. Prior to the completion of the inspection, facility staff added labels to date and to identify the contents as hazardous waste. See photo 9.

4.6 Records Review and Related Preliminary Findings

4.6.1 Contingency Plan

During the inspection, I requested a copy of the contingency. Mr. Bray presented me with a copy of the "Hazardous Waste Contingency Plan" which included the Professional Environmental Compliance Service agreement and an OSHA Emergency Action Plan Program and Training Materials, Attachment 9. I reviewed the documents using the Holland Nameplate Contingency Plan Review Check Sheet, Attachment 10. The following findings were discovered.

NOPF 5 - Contingency plan failed to describes arrangements with local police departments, fire departments, hospitals, contractors and state and local emergency response teams to coordinate emergency services pursuant to 265.37 – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(c).

NOPF 6 - Contingency plan did not included a complete list of emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems [internal and external] and decontamination equipment) and where this equipment is required. The plan includes a general location and a physical description of each item on the list but does not include a brief outline of its capabilities – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(e).

After the inspection, Holland submitted an updated copy of their Emergency Action Plan Program 2024, Attachment 14.

4.6.2. Training

Review of the training program indicated the training program was adequate.

4.6.3. Uniform Hazardous Waste Manifests and Land Disposal Restriction (LDR) Notification Forms

Prior to arriving at the facility, I had conducted an inspection of electronic manifests from 12/29/2023 through present, using RCRAInfo. See Attachment 11 – E-Manifest Review. During the inspection, I reviewed the LDR notification forms associated with hazardous waste generated at, and shipped from, the facility and double checked the most recent manifests.

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

4.6.4. Weekly Inspections

I reviewed a random sampling of weekly inspection reports including 07/13/2023, 09/14/2023, 11/09/2023, 01/12/2024, 03/15/2024, 05/09/2024, and 06/20/2024. See Attachment 13, Weekly Inspections.

No apparent issues were observed during review of these comprehensive biennial reports.

4.6.5. 2015-2021 Comprehensive Biennial Report

Prior to arriving at the facility, I was able to review the facility's 2015 through the 2021 biennial reports using RCRAInfo. Attachment 12 – Biennial Report Review. As noted above the 2023 report was received from the facility since the electronically submitted form was not yet available for review. No apparent issues were observed during review of these comprehensive biennial reports.

5.0 SUMMARY

I inspected Holland Nameplate as an LQG of hazardous waste and small quantity handler of universal waste. The following preliminary findings were noted as discussed above:

NOPF 1 - Failure to keep one (1) satellite container holding hazardous waste closed during storage, except when it is necessary to add or remove waste, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.173(a).

NOPF 2 - Failure to mark four (4) satellite accumulation containers of hazardous waste with either the words "Hazardous Waste" or with other words identifying the contents, in violation of 10 and CSR 25-5.262(2)(C)3 incorporating 40 CFR 262.34(c)(1)(ii).

NOPF 3 - Failure to clearly mark or to have visible for inspection on two containers, the date of accumulation, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(2).

NOPF 4 - Failure to clearly label or mark "Hazardous Waste" on 14 containers, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3).

NOPF 5 - Contingency plan failed to describe arrangements with local police departments, fire departments, hospitals, contractors and state and local emergency response teams to coordinate emergency services pursuant to 265.37 – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(c).

NOPF 6 - Contingency plan did not included a complete list of emergency equipment at the facility and where this equipment is required. The plan also includes a general location, a physical description of each item on the list but does not include a brief outline of its capabilities – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(e).14.

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Amber Whisnant
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ATTACHMENTS

1. Holland Nameplate Digital Image Log (13 pages/11 photos)
2. Aerial Photo (1 page)
3. Holland Nameplate Facility Diagram (1 page)
4. EPA Confidentiality Notice (1 page)
5. EPA Receipt for Documents and Samples (1 page)
6. EPA Notice of Preliminary Findings (1 pages
7. Holland Nameplate 2023 Biennial Report (3 pages)
8. Holland Nameplate Waste Stream Table (1 page)
9. Hazardous Waste Contingency Plan (31 pages)
10. Holland Nameplate Contingency Plan Review Check Sheet (1 page)
11. E-manifest Review (1 file folder w/ 8 pdf files, 7 manifests and one summary)
12. Biennial Report Review (1 file folder w/ 6 pdf files, 5 reports and one summary)
13. Weekly Inspections (1 file folder w/ 2 pdf files)
14. Emergency Action Plan Program 2024 (36 pages)