

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

Barton Solvents Inc.

204 36th Street
Bettendorf, IA 52722
(563) 355-0203 x1002

EPA ID Number: IAD087125936

On

February 24, 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 Barton Solvents Inc. (Barton) in Bettendorf, Iowa on February 24, 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

Barton Solvents Inc.:

Dan Kruse, Operations Manager

Tyler W. Chase, Branch Manager

Tom Berkheimer, Regulatory Compliance Manager

EPA Representative, ERG:

Janosh Wolters, Energy Engineer

3.0 INSPECTION PRECEDURES

After arriving unannounced at Barton at approximately 08:45, 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. The facility entrance is maintained with a security gate that I pulled up to and rang the call button. I introduced myself and was allowed to enter the main entrance and signed into the facility's visitors log. I was greeted by the operations manager, Dan Kruse. I introduced myself and presented my inspector credentials to Mr. Kruse and 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. Kruse stated himself and the facility's branch manager, Tyler Chase would be present during the opening conference. Mr. Kruse led me to Mr. Chase's office to begin the opening conference at approximately 09:00. Mr. Kruse introduced me to Mr. Chase and stated he would like to attend the opening and closing conference portions of the CEI. I initiated the opening conference with Mr. Kruse and Mr. Chase as Barton's representatives. I presented Mr. Kruse and Mr. Chase 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. Kruse with a copy of the *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections* and reviewed Barton's confidentiality rights. I informed Mr. Kruse that I would provide a *Confidentiality Notice* at the end of this inspection. At the conclusion of the opening conference, Mr. Kruse led us to his office and stated that the facility's corporate Regulatory Compliance Manager, Tom Berkheimer would attend the remainder of the inspection once he arrived on site. Mr. Berkheimer arrived on site at approximately 11:30.

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. Kruse provided a facility layout (see Attachment 1) and explained facility operations and locations of hazardous waste generation and management.

During the visual inspection of the facility, Mr. Kruse 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 three SAAs and one CAA. The facility also handles universal waste lamps and batteries in one area on site as shown on the facility layout. The universal waste storage area was visually inspected. Barton does not use parts washers on site. I conducted an in-depth visual inspection of the SAAs, the CAA, the universal waste storage area, used oil storage area, and all manufacturing areas.

Nine 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. Kruse with a *Confidentiality Notice*, and *Receipt for Documents and Samples*, which he signed as acknowledgement of receipt (see Attachments 5 and 6, respectively). No confidentiality claims were made by Barton.

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

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)

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

Barton began operating in 1948 and currently employs approximately 26 people. The facility operates on a five-day, one shift schedule. Occasionally, certain employees are offered to work overtime on a Saturday if manufacturing demands must be met. The facility has a footprint of approximately 5 acres. Barton operations consist of blending and mixing virgin solvent for desired customer specifications. The primary raw materials used are solvents and paint. The major manufacturing or processing operations that generate waste streams include blending and mixing solvents and painting 55-gallon containers. The following waste streams are produced: solvent line flush, hazardous absorbents, aerosol cans, solvent contaminated wipes, paint booth filters, used oil, used oil filters, universal waste lamps, universal waste batteries, and general trash. In addition, the facility is operating as a transfer facility which manages off-site hazardous waste in transit to a final destination facility.

4.2 RCRA Status

According to the *Hazardous Waste Site Info Verification Report for Inspector* (see Attachment 7), Barton notified as a federal Large Quantity Generator (LQG) of D001, D008, D018, D035, D043, F003, F005, F039, U002, U028, U031, U057, U069, U112, U140, U154, U159, U161, U210, U220, U228, and U239 hazardous wastes. I asked Mr. Kruse 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. Kruse stated the facility has a large list of

waste codes but primarily only generates three types of hazardous waste streams consisting of the same waste codes. These three waste streams (#1, #2, #3) are shown and discussed in the table below. Mr. Kruse stated the facility lists the remaining waste codes out of an abundance of caution or if the facility has within the last few years managed waste streams that contained any of the waste codes. Mr. Kruse stated the information on the form was accurate to the best of his knowledge. After reviewing the records and walking through the facility, I determined that the facility is operating as a federal LQG of D001, D008, D018, D035, D043, F003, F005, F039, U002, U028, U031, U057, U069, U112, U140, U154, U159, U161, U210, U220, U228, and U239 hazardous wastes, a generator of used oil, and a small quantity handler (SQH) of universal waste. Barton generates more 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.

Barton was previously inspected by EPA on July 29, 2014. The inspection did not lead to a NOPI. I also did not observe any issues or findings at the time of the inspection.

4.3 Facility Waste Streams and Management

A Waste Stream and Waste Handling Table for Barton 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	Solvent Line Flush (Waste Profile included in Attachment 8)	Flushing lines that were used to mix virgin solvents, flushing painting lines	D001, D018, D035, U002, U220, U031, U159, U057, U210, U228, U112, U140, U154, U161, U239, F003, F005 (based on process knowledge and knowledge of the product)	19,410 pounds per year	55-gallon containers in SAAs before transferred to CAA	Barton Solvents Inc. in Bettendorf, IA (IAD087125936) to WRR environmental Services in Eau Claire, WI (WID990829475) for fuel blending
2	Hazardous Absorbents (Waste Profile included in Attachment 9)	Cleanup operations of floor dry and solvent dry pads	D001, U002, U220, U031, U159, U057, U210, U228, U112, U140, U154, U161, U239, F003 (based on process knowledge and knowledge of the product)	275,000 pounds per year	55-gallon containers CAA	Barton Solvents Inc. in Bettendorf, IA (IAD087125936) to WRR environmental Services in Eau Claire, WI (WID990829475) for fuel blending
3	Aerosol Cans (Waste Profile included in Attachment 10)	Disposing of used paint touch up aerosol cans	D001 (based on process knowledge and knowledge of the product)	25 pounds per year	5-gallon container in CAA	Barton Solvents Inc. in Bettendorf, IA (IAD087125936) to WRR environmental Services in Eau Claire, WI (WID990829475) for incineration
4	Solvent Contaminated Wipes	Wiping off operator hands, drums, paint guns	Excluded per 40 CFR 261.4(a)(26) - (based on process knowledge and knowledge of the product)	One 5-gallon container per week of rags	5-gallon containers	Cintas Uniform Services in Davenport, IA for laundering (Invoice included in Attachment 11)

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
5	Paint Booth Filters (Waste Profile/Analytical Data included in Attachment 12)	Painting operations	Nonhazardous (based on process knowledge, knowledge of the product, and analytical testing)	One 55-gallon every three months	55-gallon containers	Barton Solvents Inc. in Bettendorf, IA (IAD087125936) to WRR environmental Services in Eau Claire, WI (WID990829475) for fuel blending
6	Oily Rags	Wiping off oils and greases from maintenance tools	Nonhazardous (based on process knowledge and knowledge of the product)	One 5-gallon container picked up every month	5-gallon container	Cintas Uniform Services in Davenport, IA for laundering (Invoice included in Attachment 11)
7	Used Oil	Forklift maintenance and air compressors maintenance	Exempted (managed as used oil per 40 CFR 279)	Forklifts serviced once per quarter and air compressors serviced twice per year	Taken off site at the time of servicing	Altorfer in Cedar Rapids, IA (IAD984619098) for forklifts and A-L-L Equipment in Moline, IL for air compressors recycling (Invoice included in Attachment's 13 and 14)
8	Used Oil Filters	Forklift maintenance and air compressors maintenance	Exempted (managed as used oil per 40 CFR 279)	Forklifts serviced once per quarter and air compressors serviced twice per year	Taken off site at the time of servicing	Altorfer in Cedar Rapids, IA (IAD984619098) for forklifts and A-L-L Equipment in Moline, IL for air compressors recycling (Invoices included in Attachment's 13 and 14)

#	WASTE STREAM	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
9	Universal Waste Lamps	Facility maintenance	Exempted (managed as universal waste per 40 CFR 273)	One 4-foot container and one 8-foot container per year	4-foot containers and 8-foot containers	A-TEC Recycling Inc. in Des Moines, IA (IA0000109827) for recycling (Invoice included in Attachment 15)
10	Universal Waste Batteries	Facility maintenance	Exempted (managed as universal waste per 40 CFR 273)	One 5-gallon container per year	5-gallon container	A-TEC Recycling Inc. in Des Moines, IA (IA0000109827) for recycling (Invoice included in Attachment 15)
11	General Trash	Facility operations	Nonhazardous (based on process knowledge and knowledge of the product)	One 6-yard container picked up weekly	6-yard container	Republic Services in Davenport, IA to Scott County Landfill in Davenport, IA for landfill

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4.4 Less-Than-90-Day Hazardous Waste Accumulation Area

Barton has one Less-Than-90-Day CAA on site, which is located in the Warehouse A building as labeled on the facility layout (see Attachment 1). The CAA is along the southern wall of the building. I visually inspected the CAA and observed a total of four 55-gallon containers and one 5-gallon container of hazardous waste. I observed three 55-gallon containers that held spent solvent flush, one 55-gallon container that held hazardous absorbents, and one 5-gallon container of aerosol cans (see Attachment 3, Photo 8). The facility managed all these containers as hazardous waste. All hazardous waste containers were 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”. The earliest accumulation start date observed was “12/7/2021 on a 55-gallon container of solvent flush. December 7, 2021 is within 90 days from the time of the inspection. In addition, the area is used to store waste that is received from Barton’s customers.

Barton is a transporter of hazardous waste and only stores containers on site for 10 days or less. Mr. Kruse explained the facility picks up waste from facilities bi-weekly. During the facility’s pick-up week, waste is picked up from facilities beginning on Monday. Waste is picked up Monday through the following Monday (7 calendar days). Waste is transported off site to WRR Environmental Services in Eau Claire, WI on the following Tuesday, 8 days after the first pick up occurred. This ensures that waste is always shipped off site within 10 days and gives Barton a couple days to plan if inclement weather disrupts the regular shipping schedule. At the time of the inspection, the facility was not storing any off-site waste containers, Mr. Kruse explained I visited during a shipment week. Therefore, all off site waste containers were shipped from Barton to WRR Environmental Services on Tuesday, two 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. Mr. Kruse stated that if the facility were to have a spill, the floor inside the building would act as the secondary containment until the spill could be cleaned up. In addition, any incompatible wastes are stored on opposite sides of the building and are stored on secondary containment pallets. I observed spill control equipment, and related safety equipment within close proximity of the CAA. Operators handling hazardous waste are trained to use their two-way radio system in case of emergencies. I asked Mr. Kruse if the facility inspected the CAA. Mr. Kruse stated the facility inspected the CAA at least weekly and had weekly inspection logs.

During records review, Mr. Kruse provided inspection logs for the CAA. I reviewed the logs and determined the facility was adequately performing weekly inspections of the CAA. An example of a CAA log is provided in Attachment 16.

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

4.5 Satellite Accumulation Areas

I observed three 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	Mixing Area	Solvent Flush	30 gallons	55 gallons drum
2	Dock Area	Solvent Flush	10 gallons	55 gallons drum
3	Outside Loading Area	Solvent Flush	25 gallons	55 gallons drum

During the visual inspection, I observed three SAAs. All three SAA were accumulating the same type of waste. Mr. Kruse explained that the facility mixes and blends virgin solvent together to create a desired solvent mixture or blend per customer specifications which is further explained in Section 4.6 of this report.

During the visual inspection, I visually inspected all containers in all SAAs. The hazardous waste accumulation containers observed in the facility SAAs 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 the SAAs, and no additional issues or findings were noted.

4.6 Product Solvent Mixing and Blending

The facility follows spec sheets in order to put the correct amount of material in containers ranging from 55 gallons to 375 gallons. The process occurs in the mixing area and dock area (see Attachment 3, Photo 6). The tank farm outside of the building has dedicated lines coming out of each respective tank, carrying their respective material (see Attachment 3, Photo 5). For example, a tank storing virgin methyl ethyl ketone (MEK) has a hard piped line to the mixing and dock area to allow MEK to be added to mixture or blend of solvent. A flexible hose is connected to the hard piped line and then placed inside the container that is being filled. The operator places a container on a scale and puts the desired amount of MEK inside the container. The operator would then add any other material, i.e. acetone, toluene, xylene, etc. to the container to create the desired solvent mixture. Paint flush is generated when the operator needs to change from the MEK hard piped line to another solvent line. For example, the flexible hosing would be removed from the MEK hard piped line and attached to the acetone line. The flexible hose would then be placed in the 55-gallon SAA container and acetone would be flushed through the line to remove any residual MEK. Next, the flexible hosing line that has just been flushed would be placed back into the product container and the desired amount of acetone would be added. Mr. Kruse stated this management practice allows Barton to ensure the proper amount of desired material is placed in the product container. This same type of process is completed in the dock area. The only difference between the two operations is that the dock area is used to fill tanker trailers and the mixing area is used to fill product containers smaller than 375 gallons. Lastly, solvent flush is generated at the outside loading area.

Barton receives full tanker trailers of virgin material to fill product tanks. The tanker trailer is connected via flexible hosing directly to hard piped connection to the respective product tank being filled. If the MEK product tank is being filled and the next tanker trailer is going to unload virgin acetone into the acetone product tank, the flexible line is first flushed with acetone into a 55-gallon container to ensure any residual MEK is not pumped into the acetone product tank. In addition, Mr. Kruse stated during spent flush solvent operations, depending on the material being flushed, the facility can flush lines and place the flush material in a product container that eventually is sold as Barton's solvent mixture "Barsol A-2360". I observed these product containers next to each SAA container.

Mr. Kruse explained the facility generates hazardous absorbents due to mixing and blending operations. The facility uses floor dry and solvent dry pads during mixing and blending operations which are then managed as a hazardous waste. This waste profile for this waste stream is provided in Attachment 9.

Mr. Kruse stated that waste profiles for the facility's spent solvent flush and hazardous waste absorbents include so many waste codes out of an abundance of caution. In addition, Mr. Kruse stated the facility may be mixing and blending so many different types of solutions that a large amount of waste codes could apply to these waste streams. Based on the facility's operations, using generator and process knowledge, this explanation for the use of all the waste codes on each waste stream appeared adequate.

4.7 Paint Booth

During the visual inspection, I observed one small paint booth (see Attachment 3, Photo 7). Mr. Kruse explained the facility uses the paint booth to paint product 55-gallon containers. The paint booth is large enough to paint one 55-gallon container at a time. Mr. Kruse explained a manual paint gun is used to paint the 55-gallon containers. Mr. Kruse stated the facility paint containers green and black. When the facility needs to switch the color paint to be sprayed through the paint gun, Barsol solvent mixture is used to flush the paint line. Mr. Kruse stated the facility could use Barsol A-2360 and the SDS for this mixture is provided in Attachment 17. The paint gun is attached directly to a 55-gallon container of the product solvent mixture being used to flush the line and the residual spent flush solvent is collected in a 5-gallon container. The 5-gallon container is then brought immediately to the CAA and added to a 55-gallon container of spent flush solvent. At the time of the inspection, the facility was not actively operating the paint booth and I did not observe any spent flush solvent being accumulated in the area.

Painting operations generate paint booth filter waste. Mr. Kruse explained the facility generates one 55-gallon container of paint booth filters every three months. Mr. Kruse stated the paint booth filters have been analytically tested and are shipped off site as a nonhazardous waste. The paint booth filters waste profile and corresponding analytical report are provided in Attachment 12.

I did not note any issues or concerns with the management and operation of the paint booth on site.

4.8 Solvent Contaminated Wipes

Mr. Kruse stated the facility generated solvent contaminated wipes on site. The facility purchases rags from Cintas in Davenport, IA and has an agreement for rags to be laundered weekly. Mr. Kruse explained that the facility uses two 5-gallon containers to accumulate solvent contaminated wipes (see Attachment 3, Photo 4). One 5-gallon container was observed next to the paint booth and one 5-gallon container was observed next to the mixing area. Mr. Kruse stated the rags are used in the paint booth area to wipe off the tip of the paint gun and the outside of the paint gun if needed. The 5-gallon container in the mixing area is to wipe off the top of mixed product containers. I observed no free liquids in the 5-gallon container. Mr. Kruse explained Cintas picks up one 5-gallon container per week on average. I thoroughly reviewed the requirements set forth in 40 CFR 261.4(a)(26) and documented the facility's compliance in the *EPA Inspection Checklist* (see Attachment 4). In addition, Mr. Kruse stated the facility generates oily rags that are also laundered through Cintas. Oily rags are generated from wiping off oils and greases from maintenance tools. One 5-gallon container is used to accumulate oily rags and is picked up once per month.

I did not observe any issues or concerns with the management and generation of rags on site.

4.9 Universal Waste Accumulation Area

Barton manages universal waste directly outside of the office area as labeled on the facility layout (see Attachment 1). I observed one 4-foot container of universal waste lamps and one 5-gallon container of universal waste batteries (see Attachment 3, Photo 2-3). Both containers were labeled either "Universal Waste Lamps" or "Universal Waste Batteries". The earliest accumulation start observed was "1/3/2022" on the 4-foot container of universal waste lamps. An invoice is included in Attachment 15 as an example of how Barton ships universal wastes off site.

I reviewed the management of all universal waste storage areas throughout the facility and no issues or findings were noted.

4.10 Used Oil

At the time of the inspection, I did not observe any used oil being accumulating. Mr. Kruse explained that forklifts and air compressors on site are serviced by third party companies and the used oil is transported off site at the time of servicing. Invoices for these services are provided in Attachment 13 and 14.

I did not note any issues or findings regarding used oil during the visual inspection.

4.11 Other Regulatory Requirements

Preparedness, Prevention, and Emergency Requirements - Safety and emergency equipment were present and in satisfactory condition in areas throughout the facility, including the hazardous waste CAA and SAAs (as noted in Section 4.4 and 4.5 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.

Personnel Training Requirements – Personnel are to be trained to perform hazardous waste duties, and new employees are to be trained within 6 months of start. The training, at a minimum, must be designed to ensure personnel at Barton are able to manage hazardous waste relevant to the positions in which they are employed and respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including:

1. Procedures for using, inspecting, repairing, and replacing facility emergency equipment
2. Communications and alarm systems
3. Response to fires or explosions

Upon reviewing the hazardous waste training employees of Barton receive, I determined the training to be sufficient. Mr. Kruse stated annual refresher trainings are tracked via attendance sheets. Mr. Kruse showed me the attendance sheets doing records review. I reviewed all employees who manage hazardous waste and emergency coordinators to ensure all personnel receive an annual hazardous waste refresher training. I determined all emergency coordinators and employees who require annual refresher training were up to date on their trainings. The most recent training attendance sheet is provided in Attachment 19 as an example.

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

Manifest and Land Disposal Restriction (LDR) Requirements – Barton maintained records of manifests on site at the time of inspection dating back to 2008. Barton generated approximately 36 manifests over the last three years. I reviewed all 36 hazardous waste manifests. A manifest and corresponding LDR form are provided in Attachment 20 as an example.

As a transporter, Barton receives waste picked up from facilities as described in Section 4.4 of this report. For waste transported by Barton, I observed approximately 90 manifests per quarter that were used to ship customer waste to WRR Environmental Services in Eau Claire, WI. Mr. Kruse stated the waste being picked up from customers is waste paint related materials. Some customers could vary with different waste codes attached to their waste stream, but Mr. Kruse stated it is all primarily generated from painting operations. A couple manifests from off site waste streams were taken as an example and are provided in Attachment 21. 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.

**Janosh
Wolters**

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Janosh Wolters
Energy Engineer
Date: April 12, 2022

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

Attachments:

1. Facility Layout (1 page)
2. Barton Solvents Inc. Photolog (1 page)
3. Barton Solvents Inc. Photos (9 photos/10 pages)
4. EPA Inspection Checklist (31 pages)
5. Confidentiality Notice (1 page)
6. Receipt for Documents and Samples (1 page)
7. Hazardous Waste Site Info Verification Report for Inspector (2 pages)
8. Solvent Flush Waste Profile (1 page)
9. Hazardous Absorbents Waste Profile (1 page)
10. Aerosol Can Waste Profile (1 page)
11. Laundered Rags Invoice (1 page)
12. Paint Booth Filters Waste Profile & Analytical Data (15 pages)
13. Forklift Invoice (1 page)
14. Air Compressor Invoice (1 page)
15. Universal Waste Invoice (1 page)
16. CAA Log (1 page)
17. Barsol SDS (12 pages)
18. Contingency Plan (98 pages)
19. Training Attendance Sheet (1 page)
20. Generator Manifest (2 pages)
21. Offsite Waste Manifests (4 pages)