

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

GEATER MACHINING AND MANUFACTURING

901 12th Street NE
Independence, Iowa 50644
319-334-6026 ext.239

EPA ID Number: IAD000222992

On

April 25, 2023

By

TOEROEK ASSOCIATES, INC.

For

U. S. ENVIRONMENTAL PROTECTION AGENCY

Region 7

Enforcement and Compliance Assurance Division

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, Toeroek Associates, Inc., and its subcontractor CLAENE Group (Toeroek team) conducted a hazardous waste compliance evaluation inspection (CEI) at Geater Machining and Manufacturing (Geater) at 901 12th Street NE in Independence, Iowa. The CEI was conducted under the authority of Section 3007 of Resource Conservation and Recovery Act (RCRA), as amended. The CEI covered hazardous waste generator requirements, used oil management, and universal waste requirements, as applicable. This report and its attachments present the results of the CEI.

PARTICIPANTS

Geater:

Paul Grillo, Quality Assurance Supervisor

Troy Studer, Manufacturing Quality Assurance Supervisor

Toeroek Team:

Clifford Nelles, Inspector, 816-213-5192

INSPECTION PROCEDURES

Prior to the CEI at Geater on April 25, 2023, I conducted a drive-by visual inspection. I did not observe any areas of concern during the drive-by. At approximately 7:30 a.m., I entered the lobby at Geater and informed the receptionist that I was there to conduct a CEI. The receptionist contacted Mr. Grillo, who met me in the lobby. After brief introductions, I explained the purpose and scope of the CEI to Mr. Grillo. Mr. Grillo and I adjourned to a conference room where we were met by Mr. Studer. I then proceeded to conduct an entry briefing with Messrs. Grillo and Studer.

During the entry briefing, I presented my business card and EPA credentials to Messrs. Grillo and Studer. I explained the scope and procedures for the CEI. I explained the facility's right to make confidentiality claims for any or all the information obtained and provided a Notice Regarding Proprietary/Confidential Business Information. I stated that at the conclusion of the CEI, Mr. Grillo would be presented with a Confidentiality Notice (Notice) with which he could make or not make a claim of confidentiality for the facility. I also provided Messrs. Grillo and Studer a copy of U.S. Federal Codes 1001 and 1002, concerning communication of false statements and documents to federal inspectors, and RCRA Section 3007, explaining EPA's inspection authority, both of which they read.

A copy of each of the following documents was left with Mr. Grillo during the inspection:

- RCRA Facility Access Information Sheet
- Mr. Trevor Urban's business card
- RCRA Section 3007
- U.S. Federal Codes 1001 and 1002
- Instructions for Responding to a Notice of Preliminary Findings
- Notice Regarding Proprietary/Confidential Business Information
- E-Manifest Fact Sheet: Generators
- Managing your Hazardous Waste: A Guide for Small Businesses
- U.S. EPA Small Business Resources Information Sheet
- Solvent-Contaminated Wipes Final Rule Summary Chart
- IDNR Excluded Solvent-Contaminated Wipes Rule: Management Practices for Wipes, Rags, and Shop Towels
- Recycling Electronics: A Guide for Businesses
- Lead-Based Paint Activities: Handling and Disposal
- Battery Recycling/Disposal
- Management of Fluorescent Lamps for Businesses
- Incompatible Chemicals
- Universal Wastes – Including Aerosol Cans
- TCLP – Toxicity Characteristic Leaching Procedure
- Part 279 Requirements: Used Oil Management Standards
- EPA Region 7 Emergency Response Program
- Chemical Facility Anti-Terrorism Standards
- Iowa Environmental Guide for Businesses

I reviewed the Notification Acknowledgement/Verification Report (Verification Report) with Mr. Grillo (Attachment 1). Based on this review, I changed the hazardous waste generator status from large quantity generator (LQG) of hazardous waste (generating greater than 1,000 kilograms [kg] of hazardous waste per month) to small quantity generator (SQG) of hazardous waste (generating between 100 and 1,000 kg of hazardous waste per month). I made no other changes to the Verification Report.

I conducted a visual inspection of the facility, accompanied by Messrs. Grillo and Studer. Following the visual inspection, I reviewed facility records including hazardous waste manifests with land disposal restriction (LDR) notifications, safety data sheets (SDS), and training documentation. I prepared and completed a site-specific inspection checklist to document my observations.

At the conclusion of the CEI, I conducted an exit briefing with Messrs. Grillo and Studer. During the exit briefing, I provided a Receipt for Documents and Samples, which Mr. Grillo signed, acknowledging receipt (Attachment 2). I provided Mr. Grillo the Notice, which he signed indicating no confidential business information had been provided (Attachment 3). I also provided Mr. Grillo a Notice of Preliminary Findings (NOPF), which he signed to acknowledge receipt (Attachment 4).

Maps of the facility obtained during the CEI are included in Attachment 5, and a Google Earth aerial photograph of the facility is included as Attachment 6. All 11 photographs taken during the CEI are included in Attachment 7.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

Geater manufactures and machines parts for the aerospace, electronics, and high-tech industries in one 110,000-square-foot production and storage facility. Geater began operating at its current location in 1962 and employs 300 production personnel who work one of two 10-hour shifts (4:30 a.m. to 3:30 p.m., and 3:30 p.m. to 1:30 a.m.) Monday through Friday. Geater's primary North American Industrial Classification System (NAICS) code is 332710 (Machine Shops).

Raw materials used at the facility include aluminum, hot- and cold-rolled steel, stainless steel, copper, brass, plastics, paint, epoxy, lacquer, chromate coatings, liquid rust inhibitor, acid and alkaline cleaners, and muriatic acid for pH neutralization. Manufacturing operations include fabrication and surface coating. Metal parts are laser cut or stamped on a computer numeric control (CNC) machine and moved to the Chemical Room where the parts undergo a 12-step surface treatment process. Surface treatment is performed in a series of twelve 270-gallon immersion tanks and includes cleaning, rust inhibitor application, de-oxidation, chromate coating, pH neutralization, and water rinsing. Some of the surface treated parts are then moved to the Paint Booth where they are painted and oven-dried. Finishing operations include hardware installation, welding, assembly, and final packaging.

Wastes generated during manufacturing include waste paint related material (WPRM); paint booth filters, distillation bottoms, neutralized spent acid and alkaline cleaning solutions and rinse

water, and chromate waste. WPRM consists of spent solvent and paint generated at the Paint Booth from flushing paint lines and in the Paint Kitchen during spray gun cleaning. The facility considers WPRM hazardous based on product and process knowledge. WPRM is transferred to an onsite distillation unit for solvent recovery. WPRM that cannot be processed in the distillation unit (for example, WPRM in excess of the volume that the distillation units can process) is considered hazardous waste. WPRM not processed for solvent recovery is collected by Hydrite Chemical and transported to Tradebe Treatment and Recycling (Tradebe) in East Chicago, Indiana, for fuel blending.

Paint booth filters are generated during maintenance of the Paint Booth. The facility considers paint booth filters hazardous based on product and process knowledge. Distillation bottoms remaining after solvent recovery are also considered hazardous based on product and process knowledge. Paint booth filters, distillation bottoms, and other solid paint related wastes (such as wipes and paper paint cups) are combined in hazardous waste accumulation containers (HWAC). The combined hazardous waste solids waste stream is collected by Hydrite Chemical and transported to Tradebe in East Chicago, Indiana, for fuel blending.

Spent bath solutions are generated during changeout of the immersion tank solutions approximately every three to four months. The acid and alkaline cleaning solutions, neutralizer, and rinse waters are pH adjusted (if necessary) individually within each tank prior to changeout. After neutralization, the solutions are discharged to the sanitary sewer system for publicly-owned treatment system (POTW) treatment under a permit from the city. The facility considers the neutralized acid and alkaline cleaning solutions and rinse water to be nonhazardous based on product and process knowledge.

Chromate waste is generated during replacement of the chromate bath solution approximately every two years. The facility considers chromate waste hazardous based on product and process knowledge. The waste is collected by Hydrite Chemical and transported to Evoqua Water Technologies in Roseville, Minnesota, for treatment.

Facility and equipment maintenance generate used oil, waste lamps, and general trash. The facility manages used oil according to provisions of Title 40 *Code of Federal Regulations* (40 CFR) Part 279. Used oil is collected by Hydrite Chemical and transported to Tradebe in East Chicago, Indiana, for recycling. Waste lamps are managed as universal wastes according to provisions of 40 CFR Part 273. Universal waste lamps are shipped to Waste Management for recycling using Waste Management's LampTracker recycling program. General trash is considered nonhazardous and is collected for disposal at the Buchanan County Landfill in Independence, Iowa.

Geater was last inspected by EPA on August 3, 2016. The following findings were noted during the last inspection:

- Failure to mark or label a used oil storage container with the words "used oil"
- Failure to mark or label a hazardous waste satellite accumulation container with the words "hazardous waste"
- Failure to accumulate universal waste lamps in an adequate and closed container

- Failure to demonstrate the length of time of accumulation for a universal waste container
- Failure to mark or label a universal waste lamps container with the words “universal waste lamps” or “waste lamps” or “used lamps”
- Failure to adequately train employees in the management and handling of universal waste

None of the above findings were repeated during this inspection.

2. RCRA Status

The Verification Report (Attachment 1) indicates that Geater is registered with EPA, under EPA ID IAD000222992, as a LQG of hazardous waste. Through review of current operations, interviews, and a review of waste disposal records, I determined that Geater currently generates four primary hazardous waste streams: WPRM, paint booth filters, distillation bottoms, and chromate waste. Based on the 2021 Hazardous Waste Biennial Report (Attachment 8), I estimated the facility generates approximately 204 pounds (93 kg) of WPRM and 400 pounds (181 kg) of hazardous waste solids (paint booth filters and distillation bottoms) per month. The facility also generates approximately 270 gallons of hazardous chromate waste (approximately 2,252 pounds [1,021 kg] at 8.34 pounds per gallon) during tank cleanout every two years. Chromate tank cleanout last occurred in 2022. I provided compliance assistance on planned and unplanned episodic events.

The 2021 Biennial Report includes 20,300 pounds of D002 and D007 waste acidic liquid. According to Mr. Grillo, this waste was generated from cleanout of a chromic acid immersion tank. However, the facility changed the tank solution from chromic acid to nitric and sulfuric acid in 2022. I did not include this waste in my generator status calculation. I also did not include acid and alkaline cleaning solutions and rinse waters in my generator status calculation, as the wastes are neutralized in their tanks prior to discharge and the wastes are not accumulated outside of the tanks.

Based on the 2021 Hazardous Waste Biennial Report and current manifests, I estimated that the facility was generating approximately 604 pounds (274 kg) of hazardous waste per month at the time of the inspection. Therefore, I inspected the facility as a SQG of hazardous waste. I also inspected the facility as a small quantity handler (SQH) of universal waste (accumulating less than 5,000 kg of universal waste onsite at any time) and a used oil generator.

3. Waste Streams

This section of the CEI report describes the waste streams generated by the facility, including the facility’s waste determination and waste codes, generation process and rate, management at the facility, and ultimate disposition. The following discussion of waste streams is based on conversations with facility representatives, the visual inspection, and my review of waste shipping documents. Mr. Grillo accompanied me during the visual inspection.

WPRM is generated from spent solvent and paint generated from flushing lines and cleaning of spray guns. The facility considers WPRM hazardous (D001, D018, F003, F005) based on product and process knowledge. Based on the 2021 Hazardous Waste Biennial Report (Attachment 8), the facility generates approximately 204 pounds per month. WPRM is

transferred to an onsite distillation unit for solvent recovery. WPRM that cannot be processed in the distillation unit is considered hazardous waste. WPRM not processed for solvent recovery is collected by Hydrite Chemical and transported to Tradebe in East Chicago, Indiana, for fuel blending.

Copies of the SDS for Dark Green Epoxy Primer and Hydrite Blend 4440 are included as Attachments 9 and 10. Based on the SDSs, the facility's hazardous waste determination appears to be adequate.

During the CEI, I observed the spray gun cleaning station in the Paint Kitchen (Attachment 7, Photograph 7). I also observed a 55-gallon HWAC of WPRM in the hazardous waste container accumulation area (HWCAA) (Attachment 7, Photographs 2 and 5). The HWAC was structurally sound, closed, labeled with the words "hazardous waste" and an indication of the nature of the hazard, and dated March 9, 2023.

Paint booth filters are generated during maintenance of the Paint Booth. The facility considers paint booth filters hazardous (D001, D007) based on product and process knowledge. The waste is combined with distillation bottoms and other solid paint related wastes such as wipes and paper paint cups in 55-gallon HWACs. Based on the 2021 Hazardous Waste Biennial Report, the facility generates approximately 400 pounds of combined hazardous waste solids per month. The waste is collected by Hydrite Chemical and transported to Tradebe in East Chicago, Indiana, for fuel blending.

During the CEI, I observed a 55-gallon HWAC of paint booth filters and three 55-gallon HWACs of combined hazardous waste solids in the HWCAA (Attachment 7, Photographs 1, 2, 4, and 5). The HWACs were structurally sound, closed, labeled with the words "hazardous waste" and an indication of the nature of the hazard, and marked with accumulation start dates. The oldest accumulation start date was January 20, 2023.

Distillation bottoms are generated during the distillation of WPRM from paint line flushing and spray gun cleaning. The facility considers distillation bottoms hazardous (D007, D018, F003, F005) based on product and process knowledge. The waste is combined with paint booth filters and other solid paint related wastes such as wipes and paper paint cups in 55-gallon HWACs. Based on the 2021 Hazardous Waste Biennial Report, the facility generates approximately 400 pounds of combined hazardous waste solids per month. The waste is collected by Hydrite Chemical and transported to Tradebe in East Chicago, Indiana, for fuel blending.

During the CEI, I observed the distillation unit in the paint kitchen. The distillation unit has a 15-gallon capacity and is operated one to two times per week. I observed a satellite accumulation container (SAC) for distillation bottoms in the Paint Kitchen (Attachment 7, Photograph 8). The SAC was near the point of generation, under control of the operator, structurally sound, closed, labeled with the words "hazardous waste" and an indication of the nature of the hazard, and empty.

I observed three 55-gallon HWACs of combined hazardous waste solids in the HWCAA (Attachment 7, Photographs 2, 4, and 5). The HWACs were structurally sound, closed, labeled

with the words “hazardous waste” and an indication of the nature of the hazard, and marked with accumulation start dates. The oldest accumulation start date was March 21, 2023.

Used oil is generated during facility and equipment maintenance. Mr. Grillo estimated that Geater generates two to three 275-gallon polyethylene containers (totes) of used oil per month from production equipment maintenance and coolant drained from metal turnings following the machine process. The facility manages used oil according to provisions of 40 CFR Part 279. Used oil is collected by Hydrite Chemical and transported to Tradebe in East Chicago, Indiana, for recycling. A copy of an invoice from a used oil collection on February 14, 2023, is included as Attachment 11.

During the CEI, I observed three 275-gallon totes in the receiving dock (Attachment 7, Photographs 10 and 11). The totes were empty. Mr. Grillo stated that Hydrite had last collected used oil on April 24, 2023. The totes appeared to be in good shape without any apparent damage, but were not labeled. I informed Mr. Grillo that these used oil storage containers would need to be labeled with the words “used oil” when used oil is first accumulated.

Universal waste lamps are generated by maintenance personnel replacing spent lamps. The facility manages all waste lamps as universal waste according to provisions of 40 CFR Part 273. Universal waste lamps are shipped to Waste Management using Waste Management’s LampTracker recycling program. Copies of emails concerning the last shipment of universal waste lamps in April 2023 and receipt of a new universal waste accumulation container are in Attachment 12. No universal waste lamps were in accumulation at the time of the CEI.

Spent acid, alkaline, neutralizer and rinse water are generated during changeout of the immersion tank solutions approximately every three to four months. The acid and alkaline cleaning solutions, neutralizer, and rinse waters are pH adjusted (if necessary) individually within each tank prior to changeout. After neutralization, the solutions are discharged through a floor drain to the sanitary sewer system for POTW treatment under a permit from the city. The facility generates approximately 1,350 gallons of spent acid/alkaline cleaners, Turco Altrex 24 muriatic acid neutralizer, and rinse water every three to four months. The facility considers the neutralized acid and alkaline cleaning solutions, neutralizer, and rinse water to be nonhazardous based on product and process knowledge. A copy of the SDS for Turco Altrex 24 is included in Attachment 13. I did not observe spent acid and alkaline cleaning solutions, neutralizer, or rinse water in accumulation during the CEI.

Chromate waste is generated during replacement of the chromate bath solution approximately every two years. The facility generates approximately 270 gallons of chromate waste each replacement event, which last occurred in 2022. Smaller volumes of the waste (estimated at less than 10 gallons per month) are generated through spill cleanup or disposal of unwanted materials. The facility considers chromate waste hazardous (D002, D007) based on product and process knowledge. Copies of the SDSs for Alodine T 5900, Alodine 1500, Alodine 1600, Iridite NCP Start, and Isoprep 184 are included as Attachments 14 through 18. Based on the SDSs, the facility’s hazardous waste determination appears to be adequate. The waste is collected by Hydrite Chemical and transported to Evoqua Water Technologies in Roseville, Minnesota, for neutralization and treatment.

During the CEI, I observed one 55-gallon HWAC and one 20-gallon HWAC of chromate waste in the HWCAA (Attachment 7, Photographs 3 and 6). The HWACs were structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and marked with accumulation start dates. The oldest accumulation start date was January 25, 2023.

General trash consists of office-type refuse, such as waste packaging materials and food containers. The facility has determined that general trash is nonhazardous based on product and process knowledge. General trash is accumulated in several containers throughout the facility and transferred to a 4-cubic-yard roll-off container or compactor. General trash is collected by Waste Management and transported to the Buchanan County Landfill in Independence, Iowa. During the CEI, I observed accumulation of general trash and noted no deficiencies.

4. Required Response Equipment and Hazard Management

Per 40 CFR 262.16(a)(8) and 262.16(a)(6), a SQG must operate to minimize the possibility of a fire, explosion, or spill, and must maintain emergency response equipment. During the visual inspection, I observed spill response equipment comprised of mats, absorbent materials, shovels, and brooms, as well as the presence and availability of fire extinguishers. I determined that the spill and fire response equipment was adequate for the hazardous wastes generated and accumulated at the facility.

5. Container Accumulation Areas

Geater maintains one HWCAA at the receiving dock. During the CEI, I observed one 55-gallon HWAC of paint booth filters, one 55-gallon HWAC of WPRM, three 55-gallon HWACs of hazardous waste solids, and two HWACs (one 55-gallon and one 20-gallon) of chromate waste in the HWCAA (Attachment 7, Photographs 1 through 6). Six of the HWACs were on the upper shelf of a stock rack. The HWACs on the upper shelf were not turned so the accumulation start dates were visible for inspection, and adequate aisle space between and around the HWACs was not maintained. I determined the facility failed to mark HWACs with accumulation start dates that are clearly visible for inspection, as required by 40 CFR 262.16(b)(6)(i)(C) (**NOPF No. 6**). The facility also failed to maintain adequate aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment, as required by 40 CFR 262.16(b)(8)(v) (**NOPF No. 5**).

After facility personnel removed the HWACs from the stock rack, I observed that the HWACs were structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and marked with accumulation start dates. The oldest accumulation start date January 20, 2023.

I asked Mr. Grillo if the HWCAA is inspected. He stated that the HWCAA was inspected approximately every three months. I determined the facility failed to inspect a HWCAA on a weekly basis, as required by 40 CFR 262.16(b)(2)(iv) (**NOPF No. 1**). I did not observe a telephone near the HWCAA or any other means for summoning emergency assistance. I asked Mr. Grillo if the hazardous waste workers carried two-way radios or company supplied cell

phones. He stated that two-way radios or company supplied cell phones are not provided to employees who handle the waste. I determined the facility failed to provide a device capable of summoning emergency assistance at the HWCAA, as required by 40 CFR 262.16(b)(8)(ii)(B) (**NOPF No. 4**). During the CEI, I provided compliance assistance regarding management of hazardous waste in a HWCAA.

6. Manifests and Biennial Report

Geater generated manifests for 22 hazardous waste shipments from April 25, 2020, to April 25, 2023. During the CEI, I reviewed all of the manifests and LDR notifications for the last three years. Copies of the manifests for shipments occurring in the last 12 months are included in Attachment 19. The facility submitted its 2021 Biennial Report on February 15, 2022 (Attachment 8). I noted no deficiencies during my review of manifests, LDR notifications, and the Biennial Report.

7. Preparedness and Prevention Plan

SQG facilities are required by 40 CFR 262.16(b)(9) to meet the emergency preparedness, prevention, and procedures requirements including documented arrangements with response agencies. According to Mr. Grillo, Geater is the subject of a regular inspection by the Independence Fire Department hazardous materials team. He explained the fire department is shown the layout of the facility, the location of the hazardous waste HWCAA, and other facility features during inspections.

During the CEI, I reviewed the facility's Preparedness and Prevention Plan. I noted that no emergency coordinator was mentioned. I asked Mr. Grillo if an emergency coordinator had been designated. He stated that no emergency coordinator had been designated. The facility failed to designate an emergency coordinator, as required by 40 CFR 262.16(b)(9)(i) (**NOPF No. 2**). In addition, the facility failed to post the emergency coordinators name and phone number, fire department's phone number, and locations of fire extinguishers and spill control equipment near a phone, as required by 40 CFR 262.16(b)(9)(ii) (**NOPF No. 3**).

8. Personnel Training Requirements

Personnel training is required by SQG regulations specified in 40 CFR 262.16(b)(9)(iii) to ensure that employees are thoroughly familiar with proper waste handling procedures relevant to their responsibilities. During the CEI, I asked Mr. Grillo if hazardous waste training is provided to employees. He stated that hazardous waste management training is provided to all employees who handle hazardous waste within six months of hiring or being assigned to a job that handles hazardous waste. Copies of the Certificates of Training for Messrs. Grillo and Studer are included in Attachment 20.

9. Summary of Preliminary Findings

In summary, as part of the CEI, I made the following preliminary findings:

- (1) Failure to inspect a HWCAA on a weekly basis as required by 40 CFR 262.16(b)(2)(iv) (**NOPF No. 1**).
- (2) Failure to appoint an emergency coordinator as required by 40 CFR 262.16(b)(9)(i) (**NOPF No. 2**).
- (3) Failure to post the emergency coordinators name, phone number, fire department's phone number, and locations of fire extinguishers and spill control equipment near a phone as required by 40 CFR 262.16(b)(9)(ii) (**NOPF No. 3**)
- (4) Failure to provide a device capable of summoning emergency assistance as required by 40 CFR 262.16(b)(8)(ii)(B) (**NOPF No. 4**).
- (5) Failure to provide adequate aisle space as required by 40 CFR 262.16(b)(8)(v) (**NOPF No. 5**).
- (6) Failure to mark HWACs with accumulation start dates that are visible for inspection, as required by 40 CFR 262.16(b)(6)(i)(C) (**NOPF No. 6**)

Other than items specifically noted in the narrative, I observed no additional issues. However, further review by EPA may change or add to my findings.

Clifford A.
Nelles

Digitally signed by Clifford
A. Nelles
Date: 2023.06.19
10:11:27 -05'00'

Date: _____

Clifford A. Nelles, Inspector
CLAENE Group

AMBER WHISNANT

Digitally signed by
AMBER WHISNANT
Date: 2023.06.23
20:51:05 -05'00'

Date: _____

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

Attachments:

1. Notification/Acknowledgement Verification Report (1 page)
2. Receipt for Documents and Samples (1 page)
3. Confidentiality Notice (1 page)
4. Notice of Preliminary Findings (1 page)
5. Site Maps (2 pages)
6. Google Earth Aerial Photograph (1 page)
7. Photographic Documentation (Photolog and 11 Photographs) (8 pages)
8. Copy of 2021 Biennial Report (5 pages)
9. Copy of SDS for Dark Green Epoxy Primer (12 pages)
10. Copy of SDS for Hydrite Blend 4440 (9 pages)
11. Copy of Used Oil Invoice from Tradebe Treatment (1 page)
12. Copy of Emails Regarding April 2023 Universal Waste Shipment and Receipt of New Container (2 pages)
13. Copy of SDS for Turco Altrex 24 (5 pages)
14. Copy of SDS for Alodine T 5900 (6 pages)
15. Copy of SDS for Alodine 1500 (6 pages)
16. Copy of SDS for Alodine 1600 (6 pages)
17. Copy of SDS for Iridite NCP Start (11 pages)
18. Copy of SDS for Isoprep 184 (12 pages)
19. Copies of Manifests from May 31, 2022 through February 14, 2023 (6 pages)
20. Copies of Training Certificates for Paul Grillo and Troy Studer (2 pages)