

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

**Meridian Medical Technologies Inc¹ [sic]
2555 Hermelin Drive
Saint Louis, Missouri 63144**

EPA ID Number: MOD071971899

On

April 5, 2022

By

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 7**

Enforcement and Compliance Assistance Division

1.0 INTRODUCTION

I performed a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Meridian Medical Technologies, Inc, (Meridian) located in Saint Louis, Missouri, on April 5, 2022. I conducted the RCRA inspection under the authority of RCRA Section 3007(a), as amended, and the RCRA hazardous waste management permit issued to Meridian. During the inspection, I collected the information and data necessary to determine compliance with the applicable RCRA regulatory and statutory requirements. This report and attachments present the results of the inspection. Meridian was last inspected for compliance with RCRA on May 15 – 16, 2018, by the Missouri Department of Natural Resources (MDNR). The findings of the MDNR CEI included:

- Updating generator information
- Less than 90-day hazardous waste accumulation requirements
- Contingency Plan content and arrangements with responders
- RCRA Training Plan position descriptions

2.0 PARTICIPANTS

Meridian

Lewis Robinson, Site Environmental Health and Safety Lead
Ron Leonard, Senior Environmental Health and Safety Specialist
Matthew Saganski, Environmental Health and Safety Specialist
Dennis R. Johnson, Jr., Project Manager (entrance conference)
Brian Uram, Director – Drug Product Manufacturing (entrance and exit conference)

¹ As entered into RCRAInfo

Missouri Department of Natural Resources
Brandon Backus, Environmental Specialist

Environmental Protection Agency Region 7
Kenneth Herstowski, Environmental Engineer, ECAD/CB/RCRA (Lead Inspector)
Timothy Evans, Life Scientist, ECAD/CB/RCRA

INSPECTION PROCEDURES

Prior to arriving at Meridian, Mr. Evans and I rallied with Mr. Backus at an offsite location. At about 07:59, we arrived at Meridian. A drive-by visual observation was completed from Hermelin Drive with no findings. We proceeded to the Meridian office to ask for Mr. Robinson as the facility contact. Mr. Uram arrived shortly thereafter, and Messrs. Evans and Backus and I introduced ourselves and explained the purpose of the visit was to conduct a RCRA CEI. Messrs. Robinson and Lewis arrived later upon which we adjourned to a conference room. Mr. Saganski joined us in the conference room at which time I proceeded with the entrance conference.

I explained the purpose and procedures of the RCRA CEI to Mr. Robinson. I provided a copy of RCRA Section 3007 which provides inspection authority. I presented Mr. Robinson with a copy of Title 18 United States Code, Sections 1001 and 1002, which provides for penalties if false and/or misleading information is provided to Federal representatives, and for the possession and use of fraudulent documents. Mr. Robinson was made aware of Meridian's confidentiality rights and was informed that a Confidentiality Notice would be provided at the end of the inspection with which to make a confidential business information claim. Mr. Robinson acted as the primary facility representative during the inspection.

I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.1D), unless noted differently. I completed checklists and other inspection related documents and collected photocopies that are included as attachments to this report. I collected six photographs with a digital camera and prepared a photographic log (attachments 1 and 2). Mr. Evans monitored for volatile organic emissions with a Thermo Fisher Scientific TVA2020 organic vapor analyzer utilizing a flame ionization detector (hereafter referred to as the "EPA FID"). Mr. Backus viewed potential volatile emission points with an optical gas imaging camera (a FLIR model GF320 – hereafter the "MDNR Gas Imaging Camera"). I obtained copies of records from the facility as detailed in the sections that follow.

During the inspection, discussions consisted of the facility operations, wastes generated, waste management practices, and an evaluation of RCRA air emissions compliance. I conducted a visual inspection of the one hazardous waste container accumulation area and one used oil and universal waste accumulation area.

I obtained aerial photographs of the facility using Google Earth (attachment 3) and a facility map (attachment 4). A Notice of Preliminary Findings (NOPF) was issued to the facility at the conclusion of the inspection (attachment 5). Documents and records were collected during the inspection and a Receipt for Documents and Samples was prepared and signed by Mr. Robinson (attachment 6). A Confidentiality Notice in which the facility did not claim any records or documents as confidential business information was prepared and signed by Mr. Robinson (attachment 7). A site-specific inspection checklist was prepared and completed.

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At about 07:59, Messrs. Backus and Evans, and I arrived at the Meridian facility and conducted a drive by inspection. No issues were identified from the drive by inspection. We proceeded to the facility parking lot and entered the office entrance. I introduced myself, stated our purpose to conduct a RCRA CEI, and asked to see Mr. Robinson. Mr. Uram arrived shortly after and stated Mr. Robinson would arrive soon from an offsite Meridian facility. Mr. Robinson arrived preceded by Mr. Leonard. We adjourned to a conference room for the opening conference. We introduced ourselves to those assembled (Messrs. Uram, Robinson, Leonard, and Saganski) and stated the purpose of the visit was to conduct a RCRA CEI. Mr. Johnson joined us while the early in the opening conference proceedings. Mr. Evans and I presented our EPA credentials and Mr. Backus presented his identification. I explained the purpose and procedures of the inspection. Mr. Robinson provided verbal consent on behalf of Meridian to conduct the RCRA CEI. Mr. Robinson explained the facility production was currently shut down. Meridian shuts down production about twice each year to conduct aseptic cleaning of the production equipment and support facilities. The ongoing cleaning activities prevented the inspection team from visually inspection production areas. Production was expected to resume the following week.

After the entrance discussions, Messrs. Backus and Evans, and I conducted a visual inspection of the facility. Messrs. Robinson, Leonard and Saganski accompanied us during the visual inspection. The areas reviewed included:

- Sterile Product Manufacturing waste accumulation area.
- Sterile Product Support/Warehouse Building used oil and universal waste accumulation area.

Following the visual inspection, I requested and reviewed records (attachment 8).

After completing the records review, I summarized my findings and recommendations in an exit conference with Messrs. Uram, Robinson, Leonard, and Saganski. I provided Mr. Robinson with a Confidentiality Notice and a Receipt for Documents and Samples which he signed as acknowledgement of receipt. I provided Mr. Robinson with a copy of the Confidentiality Notice (yellow copy of the completed carbonless transfer set) and Receipt of Documents and Samples (yellow copy of the completed carbonless transfer set). I reviewed and discussed my findings detailed in the NOPF. I provided Mr. Robinson the NOPF which he signed as acknowledgement of receipt. I provided a copy of the NOPF with “Instructions for Responding to a Notice of Preliminary Findings (NOPF)” printed on the reverse of the copy to Mr. Robinson (yellow copy of the completed carbonless transfer set). I discussed providing a response to the NOPF. I described my process and timeline for converting field and record review observations into an inspection report. I provided and discussed compliance assistance information.

3.0 FINDINGS AND OBSERVATIONS

3.1 General Information/Facility Description

Meridian is located in Saint Louis, Missouri, in an area zoned for commercial use. Residences are approximately 0.1-mile² west and 0.35-mile east of the facility. The site is approximately 2.85 acres. The site has three buildings accessible from Hermelin Drive on adjoining/contiguous parcels (attachment 3). The buildings have different addresses. The Sterile Product Support/Warehouse has an address of 8030 Litzsinger

² Distances and areas estimated using Google Earth Pro

Road. The SPO (security and office building) has an address of 2550 Hermelin Drive. The Sterile Product Manufacturing Building has an address of 2555 Hermelin Drive.

Meridian has been manufacturing at this location since 1973 and employs approximately 300 persons. The facility operates manufacturing 24 hours a day, seven days a week. Two primary manufacturing work shifts are 06:00 to 16:00 and 18:00 to 04:00. Additional personnel are schedule overlapping shifts to provide 24-hour manufacturing staffing. Administrative and support personnel primarily work 07:00 to 15:30. The facility consists of three contiguous properties with buildings and two non-contiguous properties on Litzinger Road – the SPA building and the Research and Development Building. Meridian leases the land and/or buildings.

Meridian manufactures EpiPen® auto-injectable device that delivers the drug epinephrine. Epinephrine medication is used when someone is experiencing a severe allergic reaction, known as anaphylaxis. The EpiPen is a combination product consisting of the drug and administering device (the auto-injector) regulated in the United States by the United States Food and Drug Administration. Meridian also manufactures the Antidote Treatment Nerve Agent, Auto-Injection device that delivers two drugs with one auto-injector. The device delivers atropine (subcutaneously) and pralidoxime chloride (intramuscularly) to treat nerve agent poisoning by certain chemicals known as anticholinesterase agents.

Meridan was founded in 1958 and was eventually acquired by Pfizer, Inc., in 2010. Altaris Capital Partners, LLC, completed acquisition of Meridian in January 2022. Meridian is now organized a limited liability corporation (LLC).

The Meridian facility is an aseptic fill facility that assembles and fills the “basic unit” of the auto-injector. The basic unit consists of a stopper/plunger, a glass vial, and the needle. All components of the basic unit are sourced from offsite suppliers. Meridian sterilizes the basic unit components, mixes the active pharmaceutical ingredient into the required dosage concentration assemblies, and assembles and fills the basic unit with the drug. The basic units are sent to another Meridian facility where it is assembled into the auto-injector.

3.2 RCRA Status

The Notification Acknowledgement/Verification Report (attachment 9) indicates that Meridian is a large quantity generator of hazardous waste and a handler of universal waste. Review of the 2021 preliminary biennial report and 2021 eManifest data confirm that Meridian is a large quantity generator. Mr. Robinson did not identify changes to the information in the Notification Acknowledgement/Verification Report during this inspection.

3.3 Hazardous Waste Streams and Management

Meridian generates hazardous wastes which exhibit one or more hazardous waste characteristics of ignitability, corrosivity, or are listed hazardous wastes. The EPA hazardous waste codes managed by Meridian are shown on the Notification Acknowledgement/Verification Report (attachment 9). The following table summarizes the wastes observed during this CEI.

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WASTE DESCRIPTION	Process	EPA WASTE CODES	ESTIMATED ANNUAL AMOUNT	STORAGE AREA	Off-Site Management
Waste Corrosive Liquids, Epinephrine Hydrochloride, Atropine Sulfate	Waste is generated in the formulation and packaging areas in the manufacturing building consisting of unused drug solution	D002	23,596 pounds (2021)	Waste is transferred from sterile drug vessels in the manufacturing area into carboys which are taken to the less than 90-day hazardous waste accumulation area in Sterile Product Manufacturing building and then transferred into a 55-gallon drum	Veolia ES Technical Solutions 7 Mobile Ave. Sauget, IL 62201 ILD098642424 Incineration - H040
Waste Hydrogen Peroxide and Peroxyacetic Acid mixture	Waste is unused or out of date cleaning solutions generated from the cleaning and sterilization processes performed in the Sterile Product Manufacturing building	D001, D002, D003	1,010 pounds (2021)	Containers of cleaning solution are taken to the less than 90-day hazardous waste accumulation area in Sterile Product Manufacturing building and then transferred into a 55-gallon drum	Veolia ES Technical Solutions 7 Mobile Ave. Sauget, IL 62201 ILD098642424 Incineration - H040
Waste Toxic Solids Epinephrine	Epinephrine packaging and unused epinephrine powder is generated from the formulation of epinephrine drug solution in the manufacturing building.	P042		The epinephrine packaging and unused powder is taken to the less than 90-day hazardous waste accumulation area in Sterile Product Manufacturing building and then transferred into a 30-gallon drums	Veolia ES Technical Solutions 7 Mobile Ave. Sauget, IL 62201 ILD098642424 Incineration - H040
Waste Isopropyl Alcohol	70% isopropyl alcohol in aerosol can dispensers are used for cleaning purposes in the manufacturing building. These cans are punctured.	D001	600 pounds (2021)	Aerosol cans are taken to the less than 90-day hazardous waste accumulation area in Sterile Product Manufacturing building punctured where they are punctured, and the alcohol collected in a 15-gallon drum	Veolia ES Technical Solutions W124 N9451 Boundary Rd Menomonee Falls, WI 53051 WID003967148 Fuel Blending - H061
Used Oil	Used oil is generated from servicing the air compressor units.			Stored in the cage area of the warehouse building.	Not determined during inspection

WASTE DESCRIPTION	Process	EPA WASTE CODES	ESTIMATED ANNUAL AMOUNT	STORAGE AREA	Off-Site Management
Universal Waste - Lamps	Facility maintenance			Stored in the cage area of the warehouse building	Veolia ES Technical Solutions W124 N9451 Boundary Rd Menomonee Falls, WI 53051 WID003967148 Recycling
Universal Waste - Batteries	Lithium-Ion Polymer and Lithium Alloy Batteries generated on-site			Stored in the cage area of the warehouse building	Veolia ES Technical Solutions W124 N9451 Boundary Rd Menomonee Falls, WI 53051 WID003967148 Recycling

I observed no apparent issues or findings related to hazardous waste characterization.

Meridian is a small quantity handler of universal waste which is discussed in Section 3.7.

Meridian manages used oil which is discussed in Section 3.8.

3.4 Less Than 90-Day Hazardous Waste Accumulation

The less than 90-day hazardous waste accumulation area is located in a room in the Sterile Product Manufacturing Building (attachment 3). The room can be accessed from the loading dock or from internal doorway into the sterile manufacturing area. Messrs. Backus and Evans, and I visually inspected the less than 90-day hazardous waste accumulation area on April 5, 2022, accompanied by Messrs. Robinson, Leonard and Saganski. I observed three containers of hazardous waste – one container of Waste Corrosive Liquids, Epinephrine Hydrochloride, Atropine Sulfate; one container of Waste Hydrogen Peroxide and Peroxyacetic Acid; and one container of Waste Isopropyl Alcohol.

The containers of Waste Corrosive Liquids, Epinephrine Hydrochloride, Atropine Sulfate and Waste Hydrogen Peroxide and Peroxyacetic Acid were closed and in good condition. Both were labeled “Hazardous Waste” and with the appropriate indication of the chemical hazards of the waste (photographs 3 and 4, attachment 1). Waste Corrosive Liquids, Epinephrine Hydrochloride, Atropine Sulfate container had an accumulation start date of February 24, 2022. The container of Waste Hydrogen Peroxide and Peroxyacetic Acid had an accumulation start date of March 11, 2022.

Notice of Preliminary Finding (NOPF) 1 – 40 CFR 262.34(d)(3): Hazardous waste container not labeled “Hazardous Waste.”

The State of Missouri has adopted by reference the EPA’s requirements for generators of hazardous waste found at 40 Code of Federal Regulations (CFR) Part 262³. The regulations at 40 CFR 262.34, Accumulation Time, allow generators to accumulate hazardous waste on site for 90 days or less without a permit as long as the generator complies with certain provisions. The requirement at 40 CFR 262.34(d)(3) states “*While being accumulated on-site, each container and tank is labeled or marked clearly with the words, “Hazardous Waste”.*” I observed the container of Waste Isopropyl Alcohol (Waste IPA) the container was closed with an aerosol can puncturing apparatus affixed to the top of the 15-gallon drum and was dated with an accumulation start date of March 1, 2022. The drum was affixed with a label that read “Non-Hazardous Waste,” described the waste as ignitable and included the EPA waste code D001, Ignitable (photographs 1 and 2, attachment 1). I identified the discrepancy of the container labeling to Mr. Saganski who stated that the waste drum labels are supplied to Meridian by Veolia.⁴ I requested a copy of the waste profile for the Waste IPA which Mr. Saganski later provided (attachment 10). The waste profile included a reference to the Waste IPA flash point of less than 80 degrees Fahrenheit which is below the 140 degrees Fahrenheit flashpoint definition for ignitable hazardous waste.

See Section 3.6 for the discussion of air emission requirements for containers.

³ See 10 CSR 25-5.262, Standards Applicable to Generators of Hazardous Waste, incorporating by reference the requirements in 40 CFR Part 262, July 1, 2013.

⁴ Veolia ES Technical Solutions

3.5 Method 21 Monitoring

Mr. Evans calibrated a Thermo Fisher Scientific TVA-2020 (EPA FID) used for Method 21⁵ monitoring the morning of April 5, 2022, prior to our arrival at the facility (attachment 11). The EPA FID has a flame ionization detector and a photoionization detector to measure organic vapor concentrations. Only the flame ionization detector was calibrated and operated for the Method 21 monitoring, i.e., the photoionization detector was switched off.

3.6 Subpart CC Air Emissions - Containers

The EPA promulgated requirements for the control of air emissions from tanks, surface impoundments, and containers at 40 CFR Part 265, Subpart CC (hereafter “Subpart CC”). The State of Missouri has adopted by reference the EPA’s requirements for owners and operators of hazardous waste treatment, storage, and disposal facilities found at 40 CFR Part 265⁶. Meridian is subject to Subpart CC for containers used to store or accumulate hazardous waste with a volatile organic concentration of 500 parts per million (ppm) or greater. The required air emission controls are specified in 40 CFR Part 265, Subpart CC.

Messrs. Backus and Evans, and I visually inspected the Less Than 90-Day Hazardous Waste Accumulation on April 5, 2022, accompanied by Messrs. Robinson, Leonard and Saganski. I observed three hazardous waste accumulation containers. Of the three, the Waste IPA container was known to contain waste with greater than 500 ppm. The Waste IPA is from the puncturing and draining of aerosol cans of 70 percent (700,000 parts per million) IPA which exceeds the volatile organic applicability level of 500 ppm. The volume of the observed container was less than 0.1 cubic meters. Containers of less than 0.1 cubic meters are not subject to the specific management requirements of Subpart CC (see 40 CFR 265.1080(b)(2)).

Mr. Evans monitored the Waste IPA container using Method 21 procedures and did not observe volatile organic emissions from the container.

I observed no apparent issues or findings related to Subpart CC for the observed Waste IPA container.

3.7 Universal Waste

Meridian is a small quantity handler of universal waste. Messrs. Backus and Evans, and I visually inspected the universal wastes accumulated in the Waste Cage on the first floor of the Sterile Product Support/Warehouse Building on April 5, 2022 (attachment 3). We were accompanied by Messrs. Robinson, Leonard and Saganski.

3.7.1 Universal Waste - Lamps

I observed two containers of universal waste lamps. One container held four-foot fluorescent lamps and the other container held eight-foot fluorescent lamps (photograph 6, attachment 1). The universal waste containers were in good condition, closed and labeled with the universal waste contents. Both containers were dated with an accumulation start date of September 15, 2021.

⁵ Method 21 – Determination of Volatile Organic Compound Leaks is found at 40 CFR Part 60, Appendix A.

⁶ See 10 CSR 25-7.265(1), Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities, which incorporates by reference 40 CFR Part 265, Subpart CC – Air Emission Standards for Containers. Missouri has adopted the provisions of 40 CFR Part 265, as in effect on July 1, 2013.

I observed no apparent issues or findings related to the management of universal waste lamps.

3.7.2 Universal Waste – Batteries

I observed two five-gallon containers of universal waste batteries (photograph 5, attachment 1). The universal waste containers were in good condition, closed and labeled with the universal waste contents. Both containers were dated with an accumulation start date of March 3, 2022.

I observed no apparent issues or findings related to the management of universal waste batteries.

3.8 Used Oil

Meridian is a generator of used oil from servicing of plant manufacturing equipment. Messrs. Backus and Evans, and I visually inspected the used oil accumulated in the Waste Cage on the first floor of the Sterile Product Support/Warehouse Building on April 5, 2022. We were accompanied by Messrs. Robinson, Leonard and Saganski. I observed one 55-gallon drum of used oil filled less than five gallons (photograph 5, attachment 1). The container was in good condition, labeled “Used Oil,” and included an accumulation start date of August 25, 2021.

I observed no apparent issues or findings related to the management of used oil.

3.9 Inspections

NOPF 2 – 40 CFR 265.174: No weekly inspection (WK3) February 2020

The provision at 40 CFR 262.34(a)(1)(i) for less than 90-day accumulation in containers references compliance with the requirements of 40 CFR Part 265, Subpart I, (265.170, *et seq.*). The requirement at 40 CFR 265.174 states “*At least weekly, the owner or operator must inspect areas where containers are stored...*”, Messrs. Backus and Evans, and I reviewed inspection logs for the Less Than 90-day Hazardous Waste Accumulation in the Sterile Product Manufacturing Building for 2019, 2020, 2021 and 2022. The inspection log for the month of February 2020 was missing the inspection entries for “Week 3” (attachment 12).

3.10 Contingency Plan

NOPF 3 – 40 CFR 265.52(d): Contingency Plan not up to date – emergency coordinator out of date.

The provision at 40 CFR 262.34(a)(4) for less than 90-day accumulation in containers references compliance with the requirements of 40 CFR Part 265, Subpart D (265.50, *et seq.*). The requirement at 40 CFR 265.52(d) states “*The plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see § 265.55), and this list must be kept up to date.*” Messrs. Backus and Evans, and I reviewed contingency plan dated September 14, 2018 (attachment 13). I asked if Danielle Ragsdale was still the primary emergency coordinator and if Brittany Black was still the alternate emergency coordinator. Mr. Robinson stated that Danielle Ragsdale was no longer employed at Meridian. I asked when her Meridian tenure ended. Mr. Saganski of November 2020 when Ragsdale left Meridian.

3.11 Training Requirements

I asked Mr. Saganski who receives RCRA training. Mr. Saganski referred me to the contingency plan which lists positions such as first responders for spills, material handlers, operations personnel, laboratory personnel

and RCRA compliance personnel. The initial and refresher training is delivered in person in a group setting by Mr. Saganski although refresher training is sometimes delivered as online modules.

Mr. Evans reviewed personnel training records selecting individuals that had conducted weekly less than 90-day accumulation area inspections in the Sterile Product Manufacturing container accumulation area. The individuals identified were M. Saganski, B. Black, C. Wisdom and S. Katam. Mr. Evans observed the four employees identified received RCRA training including, but not limited to, container management, manifesting hazardous waste, and universal waste management. Training dates noted were:

M. Saganski – May 2019, April 2020, January and December 2021

B. Black - May 2019, June 2020, June 2021

C. Wisdom - January and February 2021, February 2022

S. Katam - September 2019, April 2020

I obtained a copy of the Meridian RCRA training outline (attachment 14).

Mr. Evans observed no apparent issues or findings related to my review of personnel training.

3.12 Manifests

I reviewed the manifest information in the E-Manifest system from June 15, 2021, through April 5, 2022.

I observed no apparent issues or findings related to my review of Meridian's hazardous waste manifests.

4.0 COMPLIANCE ASSISTANCE

I provided Meridian with the following compliance assistance information:

Section 3007 Inspections Sheet (EPA Handout)

RCRA Facility Access Information Sheet (EPA Handout)

United States Code 1001/1002 Annotated (EPA Handout)

Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections (EPA Handout)

U.S. EPA Small Business Resource Information Sheet (EPA Handout)

Tampering Pollutes Our Air (EPA Handout)

Clean Air Act Vehicle Aftermarket Defeat Devices and Tampering (EPA Handout)

EPA Enforcement Alert National Compliance Initiative Focus on RCRA Air Emissions June 2020 (EPA Handout)

COMPLIANCE ADVISORY Reduction of Hazardous Waste Air Emissions April 2018 (EPA Handout)

Leak Detection and Repair: A Best Practices Guide (EPA Handout)

5.0 SUMMARY

I conducted an inspection of Meridian as a large quantity generator of hazardous waste, small quantity handler of universal waste, and used oil generator. The following preliminary findings are noted as discussed above:

NOPF 1 – 40 CFR 262.34(d)(3): Hazardous waste container not labeled “Hazardous Waste.”

NOPF 2 – 40 CFR 265.174: No weekly inspection (WK3) February 2020

NOPF 3 – 40 CFR 265.52(d): Contingency Plan not up to date – emergency coordinator out of date.

Other than the items noted above, no other preliminary findings were noted. However, the EPA may review my findings further after the inspection, which may change or add to my findings.

**KENNETH
HERSTOWSKI**

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HERSTOWSKI
Date: 2022.04.12 10:28:33 -05'00'

Kenneth Herstowski
Environmental Engineer

Date

AMBER WHISNANT

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Date: 2022.05.06 15:10:56 -05'00'

Amber Whisnant
Chief, RCRA Section, Chemical Branch
Enforcement and Compliance Assistance Division

Date

Attachments

1. Inspection [6] Photographs (7 pages)
2. Photograph Log (1 page)
3. Meridian Aerial Photographs (3 pages)
4. Meridian Facility Map (2 pages)
5. Notice of Preliminary Findings (2 pages)
6. Receipt for Documents (1 page)
7. Confidentiality Notice (1 page)
8. Records Request (2 pages)
9. Notification Acknowledgement/Verification Report (1 page)
10. Waste IPA Profile (2 pages)
11. EPA FID Calibration (1 page)
12. Inspection Logs (2 pages)
13. Contingency Plan (65 pages)
14. Training Outline (58 pages)