

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

QUAD/GREENFIELD, LLC

401 N Town Line Road
Greenfield, Iowa 50849
515-446-3505

EPA ID Number: IAD000669960

On

May 12, 2021

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 Quad/Greenfield, LLC (Quad), at 401 N. Town Line Road, Greenfield, Iowa. The CEI was conducted under the authority of Section 3007 of the 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 findings of the CEI.

PARTICIPANTS

Quad:

Renee Schwartz, Manager
Rick Stender, Facilities
Doug Dorrell, Ink Maker

Toeroek Team:

John D. Dixon, Inspector, 703-473-8717

INSPECTION PROCEDURES

Due to the spread of coronavirus disease 2019 (COVID-19) at the time of the CEI, I contacted Quad via telephone a week prior to the scheduled inspection. The purpose of the initial contact was to identify the appropriate facility representatives, ensure the representatives would be available during the CEI, and to discuss protocols, procedures, and any other requirements adopted by the facility to mitigate the spread of COVID-19. I spoke with Ms. Schwartz during this initial contact.

Prior to the CEI at Quad on May 12, 2021, I conducted a drive-by visual inspection of the facility. I did not observe any areas of concern during the drive-by. Upon arrival, I entered the main entrance and signed in at the reception desk. I was greeted in the reception area by Ms. Schwartz. I introduced myself and explained the purpose of the CEI to her. Ms. Schwartz escorted me to a conference room, where we were joined by Messrs. Stender and Dorrell. After brief introductions, I conducted an entry briefing with Ms. Schwartz and Messrs. Stender and Dorrell (Quad team).

During the entry briefing, I presented my business card and EPA credential letter to the Quad team. I explained the scope of the CEI and the data gathering procedures that would be employed (for example, interviews, visual inspection, records review, and digital photography). I then informed the Quad team of the facility's right to make confidentiality claims for any or all of the information obtained. I stated that at the conclusion of the CEI, they would be presented with a Confidentiality Notice (Notice) with which they could make or not make a claim of confidentiality for the facility. I also provided the Quad team 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 the facility during the inspection:

- RCRA Facility Access Information Sheet
- Mr. Trevor Urban's business card
- RCRA Section 3007
- U.S. Federal Codes 1001 and 1002
- 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
- Environmental Compliance Assistance Centers
- Solvent-Contaminated Wipes Final Rule Summary Chart
- IDNR Excluded Solvent-Contaminated Wipes Rule: Management Practices for Wipes, Rags, and Shop Towels
- Battery Recycling/Disposal
- Management of Fluorescent Lamps for Businesses
- Universal Wastes – Including Aerosol Cans
- TCLP – Toxicity Characteristic Leaching Procedure
- RCRA Online: A Quick Reference Guide
- EPA Region 7 Emergency Response Program
- Security Awareness
- Chemical Facility Anti-Terrorism Standards

I reviewed the Hazardous Waste Site Info Verification Report (Verification Report) with the Quad team (Attachment 1). Based on this review and observations during the CEI, I changed the facility's generator status in the Type(s) of Regulated Activity section of the Verification Report from large quantity generator (LQG) of hazardous waste to small quantity generator (SQG) of hazardous waste. I also added small quantity handler (SQH) of universal waste to the Type(s) of Regulated Activity section. I made no other changes to the Verification Report.

I conducted the visual inspection of the facility on May 12, 2021, accompanied by the Quad team. I reviewed available facility records, including manifests with land disposal restriction (LDR) notifications, waste profile records, safety data sheets (SDS), inspection records, emergency procedures documentation, and other documentation related to waste generation and management. Facility information gathered during the CEI is documented on the Data Gathering Worksheets and Checklists (Attachment 2).

Following completion of the CEI, I conducted an exit briefing with the Quad team. During the exit briefing, I provided a Receipt for Documents and Samples, which Ms. Schwartz signed, acknowledging receipt (Attachment 3). I provided Ms. Schwartz the Notice, which she signed indicating no confidential business information had been provided (Attachment 4). I made no preliminary findings during the CEI, so a Notice of Preliminary Findings (NOPF) was not left with the facility at the conclusion of the CEI. However, I explained to the Quad team that findings may be added after EPA review of the inspection report.

A facility map obtained during the CEI is included in Attachment 5. An aerial photograph of the facility was downloaded after the CEI and is included in Attachment 6. The 26 photographs taken during the CEI are included in Attachment 7. A photograph of the facility façade is included in Attachment 7, Photograph 26.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

Quad is a manufacturer of solvent-based gravure inks for publication printing. Raw materials used in ink manufacturing include solvents (toluene and petroleum naphtha), pigments, and resinate. The facility began operation at its current location in approximately 1980. Quad occupies a footprint of approximately 37,100 square feet under roof, which includes offices, warehouse space, production area, quality control (QC) labs, and support areas such as facility maintenance and mechanical equipment rooms. The facility employs eight personnel who work 6:00 a.m. to 4:00 p.m. Tuesday through Friday.

During the CEI, Ms. Schwartz described the manufacturing processes. She explained that gravure ink is a low-viscosity, fast-drying fluid ink used for high-speed printing of magazines, catalogs, and retail flyers/inserts. Quad manufactures concentrated inks, which are shipped in 6,000-gallon tanker trucks to a sister facility in Lomira, Wisconsin. At the Lomira location, the inks are diluted to standard concentrations and printing is performed. During the facility's busy season (July through November, corresponding to printing of back-to-school and holiday catalogs and flyers/inserts), Quad produces up to one 6,000-gallon tanker truck of concentrated ink per day.

The top floor of the facility houses offices, labs, and other non-production areas. The top floor also includes warehouse storage areas for dry materials such as pigments and resinate. Ink production is performed on the bottom floor of the facility. Dry materials are piped to the bottom floor via gravity flow into dispersion units. Ink production involves blending of pigments, resinate, and solvent in batches. Mechanical filtration of the ink is performed for clarification of the product. Depending on ingredient quality and/or final product specifications, centrifugal filtration may also be performed.

Ink manufacturing generates ink waste, waste ink filters, QC waste, solvent-contaminated wipes, and waste metal cans. Most liquid waste generated in the ink manufacturing process is returned to the production process. Liquid wastes that cannot be returned to production are considered to be ink waste. The facility considers ink waste and waste ink filters to be hazardous waste based on product and process knowledge. These wastes are accumulated in satellite accumulation area (SAA) containers and hazardous waste accumulation containers (HWACs). QC waste includes wipes and debris from the QC labs. The facility considers QC waste to be hazardous based on product and process knowledge, and accumulates the waste in a SAA container.

Solvent-contaminated wipes are generated during ink production, primarily through cleaning of equipment. These wipes are accumulated in dedicated containers and are collected by Cintas (Des Moines, Iowa) for laundering prior to being returned to the facility for reuse. The facility considers solvent-contaminated wipes to be excluded from the definition of solid waste according to Title 40 *Code of Federal Regulations* (40 CFR) 261.4(a)(26).

Retain samples of product inks are kept at the facility for QC purposes. When the retention period ends, the facility returns the retained ink to the production process. Empty metal cans that

previously held retain samples are accumulated for recycling. The facility considers empty metal cans to be scrap metal that is exempt from the definition of solid waste per 40 CFR 261.4(a)(13).

Facility and equipment maintenance generates spent parts washer solvent, waste lamps, waste batteries, waste plastic bags, and general refuse. Spent parts washer solvent is generated approximately once every 3 to 4 years and is considered to be hazardous waste based on product and process knowledge. The facility manages waste lamps and waste batteries as universal wastes according to 40 CFR Part 273. Waste plastic bags that previously held dry products such as pigments and resinate are compacted and baled at the facility. General refuse consists of office and packaging wastes and is compacted onsite. Waste plastic bags and general refuse are considered to be nonhazardous wastes based on product and process knowledge and transported for disposal at the Adair County Sanitary Landfill.

The fork lifts used at the facility are serviced by an outside contractor (Forklifts of Des Moines in Des Moines, Iowa). Used oil generated during servicing is transported to the contractor's facility for accumulation and recycling. An invoice for fork lift servicing, dated February 20, 2020, is in Attachment 8. This invoice included an environmental charge, indicating that the contractor assumed responsibility for the used oil generated during the service event. I did not observe used oil in accumulation at Quad during the CEI and concluded that the facility was not operating as a used oil generator.

In March 2016, Booz Allen Hamilton, an EPA contractor, conducted a CEI for EPA at Quad. Following the CEI, the inspector made a preliminary finding that the facility failed to provide means of summoning emergency assistance at a hazardous waste container accumulation area. This preliminary finding was not repeated during this inspection.

2. RCRA Status

Quad was identified as a large quantity generator (LQG) of hazardous waste, generating more than 1,000 kilograms (kg) of hazardous waste per calendar month on the Verification Report provided by EPA (Attachment 1). During the CEI, I reviewed hazardous waste manifest records from calendar year 2018 to present. The facility ships hazardous waste approximately quarterly. Based on manifest records, I concluded that the facility operated as a LQG of hazardous waste in 2018 and 2019. The facility also appeared to operate as a LQG during the first quarter of 2020, as the March 2, 2020, manifest included 7,331 pounds (3,325 kg) of hazardous waste generated over a 2.5-month period. However, manifests for the last four quarterly shipments indicated a hazardous waste generation rate of 2,383 to 4,193 pounds (1,081 to 1,902 kg) per quarter.

Ms. Schwartz confirmed that the month-to-month hazardous waste generation rate has been relatively consistent over the past year, and that the facility's hazardous waste generation rate was likely below the LQG threshold during that timeframe. She stated that Quad still considers itself to be a LQG of hazardous waste and manages waste per the LQG requirements. I explained that I would inspect the facility as a SQG or LQG based on the current generation rate at the time of the CEI. Based on the manifest records and observations during the visual inspection, I determined the facility has been operating as a SQG of hazardous waste since approximately March 2020, and I inspected the facility as such. I also inspected the facility as a SQH of universal waste (accumulation of less than 5,000 kg of universal waste at any time).

A copy of the facility's Hazardous Waste Generation and Shipping Summary document for calendar year 2020 is in Attachment 9. Copies of manifests and LDR notifications for hazardous waste shipments from March 2, 2020, through March 2, 2021 are in Attachment 10.

3. Waste Streams

This section of the CEI report describes 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 my interviews with the Quad team, the visual inspection, and my review of available documentation.

The visual inspection included the QC labs, warehouse area, ink production area, maintenance area, mechanical equipment room, and the storage building. I observed two SAAs during the visual inspection and did not observe accumulation of more than 55 gallons of hazardous waste in any SAA. I also observed the facility's hazardous waste container accumulation area (HWCAA) in the pump room.

Photographs were taken in all areas except the ink production area. The facility considers the ink production area to be a potentially-explosive atmosphere and prohibits camera use in the area. I noted no concerns within the ink production area where photographs could not be taken.

Ink waste consists of ink waste (ink, solvent, pigment, and/or resinate mixture) generated during ink production or equipment/vessel cleaning. The facility considers ink waste to be hazardous waste (D001) based on product and process knowledge. A copy of the waste profile for ink waste is in Attachment 11. Based on manifest records from the past year, the facility generates 2,383 to 3,876 pounds (1,081 to 1,758 kg) of ink waste per quarter. Ink waste is accumulated in 55-gallon SAA containers in the production area, and full containers are transferred to the Pump Room HWCAA. The waste is collected by Clean Harbors Environmental Services (Clean Harbors) and is transported to Clean Harbors in Kimball, Nebraska, for incineration. The waste was last collected on March 2, 2021 (Attachment 10, Page 16).

During the CEI, I observed a 55-gallon SAA container of ink waste in the production area near a centrifugal filter. Photographs were not taken due to the facility's restriction on photographs in the production area. The SAA container was at the point of generation, under control of the operator, structurally sound, closed, and labeled with the words "hazardous waste" and an indication of the nature of the hazard. I also observed five 55-gallon HWACs of ink waste in the Pump Room HWCAA (Attachment 7, Photograph 6). The HWACs were structurally sound, closed, labeled with the words "hazardous waste" and marked with accumulation start dates (Attachment 7, Photographs 7 and 8). The earliest accumulation start date was March 31, 2021.

Waste ink filters consists of spent filter cartridges used for ink filtration during production. The facility considers waste ink filters to be hazardous waste (D001, F005) based on product and process knowledge. A copy of the waste profile for waste ink filters is in Attachment 12. Based on manifest records from the past year, the facility generates 300 to 500 pounds (136 to 227 kg) of waste ink filters every 6 months. Waste ink filters are accumulated in 55-gallon SAA containers in the production area, and full containers are transferred to the Pump Room

HWCAA. The waste is collected by Clean Harbors and is transported to Clean Harbors in Kimball, Nebraska, for incineration. The waste was last collected on December 3, 2020 (Attachment 10, Page 12). I did not observe waste ink filters in accumulation during the CEI.

QC waste consists of gravure ink wipes and debris generated during QC testing of raw materials and finished product. The facility considers QC waste to be hazardous waste (F005) based on product and process knowledge. A copy of the waste profile for QC waste is in Attachment 13. Based on manifest records from the past year, the facility generates approximately 50 pounds (23 kg) of QC waste every 6 months. QC waste is accumulated in a 55-gallon SAA container in the QC labs, and full containers are transferred to the Pump Room HWCAA. The waste is collected by Clean Harbors Clean Harbors and is transported to Clean Harbors in Kimball, Nebraska, for incineration. The waste was last collected on June 3, 2020 (Attachment 10, Page 4).

During the CEI, I observed a SAA container of QC waste in the QC labs (Attachment 7, Photograph 1). The SAA container was near the point of generation, under control of the operator, structurally sound, and closed. The SAA container was labeled with the words “hazardous waste” and an indication of the nature of the hazard (Attachment 7, Photographs 2 through 5).

Spent parts washer solvent is generated during servicing of the facility’s parts washer unit. The facility considers spent parts washer solvent to be hazardous waste (D039) based on product and process knowledge. Ms. Schwartz stated that the parts washer unit is rarely used, and the solvent (Safety-Kleen Premium Solvent) is changed out every 3 to 4 years. Based on manifest records, the facility generates approximately 7 gallons of spent parts washer solvent every 3 to 4 years. The waste is transported offsite by the Safety-Kleen service technician during the parts washer servicing event, and is transported to Safety-Kleen in Des Moines, Iowa, for bulking and offsite transfer. The waste was last generated on September 14, 2017 (Attachment 14). During the CEI, I observed the facility’s parts washer unit and noted no deficiencies (Attachment 7, Photograph 14).

Solvent-contaminated wipes are generated throughout the facility from cleaning ink and/or solvent from equipment, vessels, containers, or personnel. The facility considers solvent-contaminated wipes to be excluded from the definition of solid waste according to 40 CFR 261.4(a)(26). The wipes are accumulated in two 5-gallon containers in the production area and one 5-gallon container in the maintenance area. Every Thursday, solvent-contaminated wipes are collected from the production area and consolidated in the maintenance area. Solvent-contaminated wipes are collected by Cintas in Des Moines, Iowa, for laundering and reuse. Based on invoice records, Quad maintains a rolling inventory of 100 cloth wipes every week (Attachment 15).

During the CEI, I observed the two solvent-contaminated wipes accumulation containers in the production area. Photographs were not taken due to the facility’s restriction on photographs in the production area. However, I observed the containers were structurally sound, closed, and labeled with the words “excluded solvent-contaminated wipes.” The wipes within the containers appeared to be dry, and no free liquids were noted. I also observed the solvent-contaminated

wipes accumulation container in the Maintenance area during the CEI. This container was structurally sound, closed, labeled with the words “excluded solvent-contaminated wipes” and was empty (Attachment 7, Photographs 15 and 16).

During the records review, I noted that the facility tracks accumulation times and collection dates for solvent-contaminated wipes, and keeps all documentation required to maintain the solid waste exclusion. I noted no deficiencies regarding management of excluded solvent-contaminated wipes during the CEI.

Waste metal cans are generated during recycling of ink retain samples. Samples of ink product are retained the facility for QC purposes. When the retention period ends, the retain sample is recycled back through the production process. Empty metal cans that previously held retain samples are accumulated in a 1-cubic-yard fiberboard container in the storage building. The facility manages waste metal cans as scrap metal that is exempt from the definition of solid waste per 40 CFR 261.4(a)(13). Based on manifest records, the facility generates approximately 216 pounds of waste metal cans per year. Waste metal cans are collected by Clean Harbors and transported to Clean Harbors in Kimball, Nebraska, for recycling. The waste was last collected on December 18, 2019. During the CEI, I observed waste metal cans in accumulation and noted no deficiencies (Attachment 7, Photographs 24 and 25).

Waste lamps are generated during facility maintenance, and include fluorescent, compact fluorescent, and high-intensity discharge (HID) lamps. The facility manages all waste lamps as universal waste according to 40 CFR Part 273. Waste lamps are accumulated in universal waste accumulation containers in the Mechanical Equipment Room. Based on invoice records, the facility generates approximately 148 waste lamps per year. Waste lamps are collected by A-TEC Recycling in Pleasant Hill, Iowa, for recycling. The waste was last collected on July 31, 2020 (Attachment 16).

During the CEI, I observed two fiberboard containers holding universal waste lamps in the Mechanical Equipment Room (Attachment 7, Photograph 21). One container held two waste fluorescent lamps, and the other held three waste HID lamps. Both universal waste accumulation containers were structurally sound and closed. The containers were labeled with the words “universal waste – lamps” and were marked with accumulation start dates (October 5, 2020, and January 1, 2021) (Attachment 7, Photographs 17 through 20).

Waste batteries are generated during equipment maintenance, and include lead-acid, lithium, and alkaline batteries. The facility manages all waste batteries as universal waste according to 40 CFR Part 273. Waste batteries are accumulated in universal waste accumulation containers in the Mechanical Equipment Room. Based on invoice records, the facility generates approximately 1,020 pounds of waste batteries per year. Waste batteries are collected by A-TEC Recycling in Pleasant Hill, Iowa, for recycling. The waste was last collected on July 31, 2020 (Attachment 16).

During the CEI, I observed two containers holding universal waste batteries in the Mechanical Equipment Room (Attachment 7, Photograph 22). One container held approximately 5 pounds of waste alkaline batteries, and the other held one waste lithium battery. Both universal waste

accumulation containers were structurally sound, labeled with the words “universal waste – batteries,” and marked with accumulation start dates (September 15, 2020, and April 8, 2021) (Attachment 7, Photograph 23).

Waste bags consist of plastic packaging for dry products used in the ink manufacturing process, such as pigments and resinate. The facility determined waste bags are nonhazardous waste based on product and process knowledge. Waste bags are placed into an onsite compactor and baled. The waste is collected by Clayton Auto Salvage in Greenfield, Iowa, and transported to the Adair County Sanitary Landfill for recycling. During the CEI, I observed the compactor/baler for waste bags and noted no deficiencies.

General refuse consist of office- and packaging-type refuse generated at the facility. The facility determined general refuse is nonhazardous waste based on product and process knowledge. General refuse is accumulated in several containers throughout the facility and transferred to an onsite compactor. The waste is collected by Clayton Auto Salvage in Greenfield, Iowa, and transported to the Adair County Sanitary Landfill for disposal. During the CEI, I observed accumulation containers and the compactor for general refuse and noted no deficiencies.

4. HWCAA

Quad maintains one HWCAA in the Pump Room. The Pump Room was designed for flammable liquid storage, and is bermed with a blind sump for spill containment (Attachment 7, Photograph 10). At the time of the CEI, the HWCAA held five HWACs of ink waste. I observed adequate aisle space between the HWACs for inspection and emergency response. I asked Ms. Schwartz if the HWCAA is inspected. She stated that weekly inspections of the SAAs and HWCAA are performed, and the inspections are documented. During the CEI, I reviewed weekly inspection records from calendar year 2018 to present and noted no missed inspection weeks.

5. Required Response Equipment and Hazard Management

Per 40 CFR 262.15(a)(7) and 262.16(b)(8), a SQG must operate to minimize possibility of a fire, explosion, or spill, and must maintain emergency response equipment. During inspection of the HWCAA, I observed brooms, shovels, fire extinguishers, fire blanket, eye wash station, and a spill kit with absorbent materials in or near the HWCAA (Attachment 7, Photographs 9, 11, and 12). I noted similar emergency response equipment near the SAAs in the production area. I also observed working telephones near the SAAs and HWCAA for summoning emergency assistance if needed (Attachment 7, Photograph 13). I noted no deficiencies related to emergency response equipment.

6. Manifests

The facility ships hazardous waste on an approximately quarterly schedule. During the CEI, I reviewed 12 manifests generated by the facility over the last 3 years (two from 2018, five from 2019, four from 2020, and one from 2021). Manifests included LDR notifications. I did not identify any deficiencies related to manifest preparation or retention. Copies of the manifests and LDR notifications from March 2, 2020, through March 2, 2021 (five shipments) are in Attachment 10.

7. Preparedness and Prevention

Per 40 CFR 262.16(b)(9)(i), a SQG must have identified an emergency coordinator (EC) familiar with facility operations. Quad maintains a RCRA Contingency Plan that identifies Ms. Schwartz as the primary EC. She confirmed that the primary and secondary ECs listed in the Contingency Plan were accurate, as the plan was last updated in April 2021. Ms. Schwartz explained that Quad maintains the Contingency Plan since the facility has been a LQG of hazardous waste, and the hazardous waste generation rate could increase to LQG in the future.

I reviewed the Contingency Plan for LQG-required content during the CEI, and noted that the plan did not include a complete evacuation plan. I also noted that the facility had not prepared and submitted a Quick Reference Guide when the Contingency Plan was updated. These are not requirements for SQG facilities. However, I provided compliance assistance to Ms. Schwartz regarding content of the Contingency Plan and Quick Reference Guide so that these deficiencies could be addressed if or when Quad resumes operation as a LQG.

Per 40 CFR 262.16(b)(9)(ii), a SQG must post by the telephone the name of and contact information for the EC; the phone number of the fire department; and locations of fire extinguishers and spill response equipment. This information is included in the Contingency Plan, which is posted near a telephone in the office area.

8. Personnel Training Requirements

Per 40 CFR 262.16(b)(9)(iii), a SQG must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal facility operations and emergencies. Ms. Schwartz explained that all personnel receive annual waste handling training. Personnel who manage hazardous waste and personnel named as ECs receive additional hazardous waste management training annually. During the CEI, I reviewed content of the annual waste handling training provided to all employees, and noted that the training addresses waste identification, management, and emergency response procedures. Training records are maintained in a database. A copy of the database record showing waste training received in 2020 and 2021 is in Attachment 17. I noted no deficiencies with the types and frequencies of personnel training during the CEI.

9. Summary of Preliminary Findings

In summary, as part of the CEI, I made no preliminary findings. However, further review by EPA may change or add to my findings.

John D. Dixon

Digitally signed by John D. Dixon
DN: cn=John D. Dixon, gn=John D. Dixon, c=US, United States
Reason:
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Date: 2021.06.15 11:56:05.00

Date: _____

John D. Dixon
Inspector, CLAENE Group

AMBER WHISNANT

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Amber Whisnant
Section Chief, ECAD/CB/RCRA

Attachments:

1. Hazardous Waste Site Info Verification Report (1 Page)
2. Data Gathering Worksheets and Checklists (23 Pages)
3. Receipt for Documents and Samples (1 Page)
4. Confidentiality Notice (1 Page)
5. Facility Map (1 page)
6. Aerial Image of the Facility (1 Page)
7. Photographic Documentation (Photolog and 26 Images) (16 Pages)
8. Fork Lift Service Invoice, dated February 25, 2020 (1 Page)
9. Hazardous Waste Generation and Shipping Summary for 2020 (2 Pages)
10. Manifests and LDR Notifications (18 Pages)
11. Profile for Ink Waste (4 Pages)
12. Profile for Waste Ink Filters (3 Pages)
13. Profile for QC Waste (3 Pages)
14. Manifest for Spent Parts Washer Solvent (2 Pages)
15. Cintas Invoice, dated May 4, 2021 (1 Page)
16. A-TEC Invoice for Universal Waste, dated July 31, 2020 (1 Page)
17. Training Record for 2020 and 2021 (2 Pages)