

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

Vic's Auto Body Repair, Inc.
1514 Willow Creek Drive
Iowa City, Iowa 52246
(319) 337-2993

EPA ID Number: IAD054777859

On

October 27, 2021

By

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

1.0 INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division, I conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Vic's Auto Body Repair, Inc. (Vic's) located in Iowa City, Iowa, on October 27, 2021. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. During the CEI, I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. The inspection report and attachments present the results of the CEI.

2.0 PARTICIPANTS

Vic's:

Bill Wagenknecht, Owner, approximately 43 years with the company.
Lance Ganka, Shop Foreman, approximately 38 years with the company.
Scott Wagenknecht, Painter Technician, approximately 23 years with the company.

U.S. Environmental Protection Agency (EPA):

H. D. "Doug" Bryant, CPP, PCI, Civil Investigator, NOWCC/SEE, ECAD/Chemical Branch/RCRA Section (Lead Inspector)
Trevor Urban, Environmental Scientist, ECAD/Chemical Branch/RCRA Section (Credentialed Observer)

3.0 INSPECTION PROCEDURES

Due to the COVID-19 pandemic, I contacted the facility via telephone October 15, 2021, prior to the intended onsite inspection. The purpose of the initial contact was to identify the appropriate facility representative, ensure the representative would be available during the CEI, and to discuss protocols, procedures, and other requirements adopted by the facility to mitigate the spread of COVID-19.

Prior to beginning the inspection, I conducted a visual reconnaissance of Vic's on October 27, 2021, searching for areas of concern observable from the adjacent roadway.

Mr. Urban and I arrived at Vic's at approximately 0915 hours, October 27, 2021. We entered a large open administrative office and waiting area, outfitted with desks and chairs, a couch, several side chairs, and a coffee table. We were greeted by a receptionist working at a desk near the front entry area. I asked to see Mr. Bill Wagenknecht, identified during my telephone call as the Owner and point of contact. Mr. Bill Wagenknecht approached the entry area from his desk located in the rear of the administrative office area, and I explained the purpose and procedures of the inspection. We proceeded to Mr. Bill Wagenknecht's desk that was used throughout the CEI. Mr. Ganka was sitting at a desk located in front of Mr. Bill Wagenknecht's desk. Mr. Bill Wagenknecht asked that Mr. Ganka participate in the inspection. Trevor Urban presented his EPA credentials, and I gave Messrs. Bill Wagenknecht and Ganka our business cards; the Vic's personnel did not have personal business cards to exchange. Messrs. Bill Wagenknecht and Ganka participated throughout all facets of the CEI.

I next presented Messrs. Wagenknecht and Ganka with a copy of RCRA section 3007(a), which provides 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. They were made aware of their confidentiality rights and were informed that a Confidentiality Notice would be provided at the end of the inspection to make or not to make any claims. Mr. Bill Wagenknecht acted as the official facility representative during the inspection.

The inspection consisted of an entry briefing, 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. I downloaded satellite imagery of the exterior of the facility from the public domain (Attachment 1).

Document photocopies and 12 photographs were collected as inspection documentation (Attachments 1-15). Information collected during the CEI was recorded on a checklist and in field notes which are referenced in the report. I followed the inspection procedures discussed in the RCRA Compliance Evaluation Inspection Standard Operating Procedure (No. 2321.1C), unless noted differently.

At the conclusion of the inspection, I conducted an exit briefing, during which I summarized my findings and recommendations with Messrs. Bill Wagenknecht and Ganka. I provided Mr. Wagenknecht a *Confidentiality Notice*, which he signed, indicating no confidentiality claims were made by the facility (see Attachment 2). I provided Mr. Wagenknecht a *Receipt of Documents and Samples*, which he signed acknowledging receipt (Attachment 3).

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

Section 3007 Inspections Sheet (EPA Handout)
RCRA Facility Access Information Sheet (EPA Handout)
United States Code 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)
Solvent-Contaminated Wipes Final Rule Chart (EPA Handout)
Lead-Based Paint Activities (IDNR Handout)
Excluded Solvent-Contaminated Wipe Rule (IDNR Handout)
Battery Recycling/Disposal (IDNR Handout)
Universal Wastes Including Aerosol Cans (IDNR Handout)
TCLP Waste Determination Testing (IDNR Handout)
Industry Sector Notebooks (EPA Handout)
Environmental Compliance Assistance Centers (EPA Handout)
e-Manifest Fact Sheet (EPA Handout)
RCRA Online A Quick Reference Guide (EPA Handout)
Emergency Response Program (EPA Handout)
Security Awareness (EPA Handout)
Managing Your Hazardous Waste: A Guide for Small Business (EPA Handout)

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

Vic's occupies approximately two-thirds of a multitenant facility located in a light industrial area on the southwest side of Iowa City, Iowa. The facility performs auto body and collision repair and is operated by 10 personnel, working one shift, 0800-1700 hours, Monday-Friday. Vic's operates two painting booths and performs routine collision repair activities, to include damaged parts removal and replacement, sanding, paint priming and preparation, painting, buffing, and detailing. The leased area occupies approximately 4,200 square feet under roof. The North American Industry Classification System (NAICS) code for this facility is 811121 – Automotive Body, Paint, and Interior Repair and Maintenance.

4.2 RCRA Status

This is the first RCRA compliance inspection of this facility. The facility notified the EPA on May 27, 1994, that it is a Very Small Quantity Generator (VSQG) of D001 and D035 characteristic and F003 and F005 listed hazardous waste (HW). The facility operates a five-gallon solvent reclamation distillation unit on site. The facility converted the majority of conventional painting products to aqueous painting products in 2012. It was determined that the facility was operating as a Very Small Quantity Generator (VSQG) of HW at the time of this inspection (Attachment 4), generating less than three gallons of aqueous waste paint and less than two gallons of HW solvent weekly. The facility does not generate any spent fluorescent lamps, having converted to light emitting diode (LED) lighting fixtures approximately three years ago. The facility manages lead-acid batteries generated from wrecked vehicles in accordance with 40 CFR Part 266, Subpart G. The facility does not generate any used oil.

4.3 Facility Waste Streams and Management

Vic's has contracted Stericycle Specialty Waste Solutions, Inc. (Stericycle), 500 41st Avenue Drive SW, Cedar Rapids, to manage the disposition of HW generated by the facility. The HW is transported by Stericycle (MNS000110924). The designated facility receiving HW for fuel blending is Systec Environmental Corporation (Systec), Fredonia, Kansas (KSD980633259).

The following waste streams are managed by Vic's:

Waste Aqueous Paint: Mr. Ganka explained that Vic's uses a family of color paint products that were developed by Pittsburg Plate Glass (PPG) Industries to be more environmentally friendly. This family of paint products raised the flashpoint of coating products to approximately 200° F and reduces or eliminate the use of heavy metals as paint color pigments. This family of paint products is referred to as Envirobase. Mr. Ganka stated that Vic's uses Envirobase painting products described in Attachment 5. In addition to water, the thinner product used with these products is described in Attachment 6.

Vic's currently manages waste aqueous paint as if it were D001 characteristic and F003 and F005 listed HW. However, a review of product specifications indicates that the waste aqueous paint stream may not be HW; Vic's may choose to conduct a HW determination and reevaluate the manner in which this waste stream is managed in the future. Mr. Ganka stated that Vic's generates less than three gallons of this waste stream weekly. The waste aqueous paint is collected in a five-gallon container located inside the paint kitchen. The contents of this five-gallon container of waste aqueous paint are transported weekly by painters from the paint kitchen to a 55-gallon drum that is located outside the building. The contents of this 55-gallon drum of waste aqueous paint are picked up and manifested off-site by Stericycle as UN1263, Waste Paint, with D001 and D035 characteristic and F003 and F005 listed HW codes.

Waste Primer/Thinner/Sealer: Mr. Ganka stated that Vic's uses several products that are used to prepare parts to accept the aqueous color paints. These products are described as primer, thinner and sealer products, described in Attachments 7-11. All of these products exhibit flash points below 140° F characteristic of D001 HW. These products are routinely mixed in small quantities and very little waste is generated. However, if waste primer/thinner/sealer is generated, the waste is poured through a funnel into a five-gallon container of waste solvent located inside the paint kitchen. The waste liquid collected in this five-gallon container is distilled using the five-gallon solvent reclamation unit described below. Any of this HW stream generated is included in totals discussed below for the mixed waste solvent stream.

After the CEI, I was able to review the specifications of products used by Vic's in greater detail. During my review, I determined that the primer product (Attachment 7) contains barium sulfate and a HW determination of this waste stream should be undertaken to take this constituent into account. Therefore, I have added a notice of preliminary findings (NOPF) to this report that: **Vic's must conduct an adequate HW determination of the waste primer/thinner/sealer waste stream in accordance with the provisions of 40 CFR §262.11 (NOPF #1) (added after the CEI).**

Empty Waste Clearcoat/Hardener Containers: Mr. Ganka stated that Vic's uses clearcoat and standard hardener products, described in Attachments 12 and 13. Both of these products exhibit flash points below 140° F. However, Mr. Scott Wagenknecht stated that virtually no liquid waste clear coat and hardener is generated in the facility because his knowledge of the painting process and how the products are used. He stated that small amounts of the clearcoat and hardener products are mixed in plastic cups and dispensed using the paint gun equipment. When application of the mixture has been completed, the plastic cups are typically RCRA-empty. He stated that any waste clearcoat and hardener left in the plastic cups sets up and hardens in minutes, due to the properties of the clearcoat and hardener products. He added that he understood that the hardened waste clearcoat and hardener is inert and therefore non-RCRA hazardous. He added that the empty waste clearcoat/hardener containers are disposed in the general trash. He stated that Vic's generates fewer than 10 waste clearcoat/hardener plastic cups daily.

I realized after the inspection that I did not adequately address the HW status of this waste stream at the point of generation for containers of waste clearcoat/hardener that were not RCRA-empty. Therefore, I have added the following preliminary finding: **Vic's must conduct an adequate HW determination on the clearcoat/hardener waste stream prior to hardening in accordance with the provisions of 40 CFR §262.11 (NOPF #2) (added after the CEI).**

Mixed Waste Solvent: Mr. Ganka stated that Vic's uses a general-purpose lacquer thinner solvent product described in Attachment 14. This product is used to clean the painting equipment, e.g., paint guns. The mixed waste solvent is managed as D001 characteristic and F003 listed HW.

Mr. Scott Wagenknecht stated that he generates less than two gallons of waste solvent weekly. This mixed waste solvent would exhibit D001 characteristic and the F003 and F005 listed HW properties, as well as characteristics/listings associated with the waste primer/thinner/sealer waste stream described above, as applicable. He stated that the liquid waste solvent mixture is poured through a funnel into a five-gallon container positioned inside a flammables cabinet located inside the paint kitchen. He explained that the mixed waste solvent is distilled weekly using a five-gallon solvent reclamation unit. He stated that distillation is approximately 75% effective, routinely returning between three and one half-four gallons of useable reclaimed solvent for every five gallons or so of waste solvent reclaimed by the unit. Mr. Scott Wagenknecht stated that approximately two inches of dried residue is produced in the bottom of a five-gallon container after 10 batches of solvent reclamation; this would span a period of approximately 10 weeks. He estimated that the residue generated over the approximate 10-week period weighed less than one pound.

Mr. Bill Wagenknecht and I discussed the nature of the HW dried residue still bottoms and the fact that the F005 spent solvent HW listing would carry over to the dried residue. I stated that he needed to perform an adequate HW determination on the dried residue still bottoms and advised him that the state of Iowa does not allow even DeMinimus amounts of HW in the general trash for landfilling. Mr. Bill Wagenknecht stated that he has attended “best practice” painting association seminars and has determined that the waste residue generated by the solvent reclamation unit is dry, inert, and therefore non-RCRA hazardous, by virtue of product and process knowledge. He added that the residue is disposed in the general trash. I provided compliance assistance literature on making adequate HW determinations during my exit briefing. After further reflection, I have determined that: **Vic’s must conduct an adequate HW determination of the mixed waste solvent and still bottoms waste stream in accordance with the provisions of 40 CFR §262.11 (NOPF #3) (added after the CEI).**

Cloth Shop Rags: Mr. Bill Wagenknecht stated that Vic’s uses cloth shop rags to detail finished painting projects. Mr. Ganka stated that Vic’s uses between 30-40 cloth shop rags weekly. Mr. Bill Wagenknecht stated that the cloth shop rags are used to clean and detail vehicles and are not used in the painting area. The cloth shop rags are used to clean dirt and dust off painted surfaces. He added that the cloth shop rags could be used with commercial polishing and glass cleaning products. He stated that the cloth shop rags have been determined to be non-RCRA hazardous, by virtue of product and process knowledge. The cloth shop rags are picked up and laundered by Aramark located in Waterloo, Iowa.

Waste Paper Disposable Wipes: Mr. Scott Wagenknecht stated that Vic’s uses paper disposable wipes in the paint kitchen and inside painting booths. The paper disposable wipes are routinely used to clean the tips of paint guns. Small amounts of the lacquer thinner solvent product described in Attachment 14 are applied to the paper

disposable wipes when cleaning the tips of the paint guns. The paper disposable wipes are reused as long as the wipe remains viable. The paper disposable wipes dry nearly instantaneously, and the waste paper disposable wipes are discarded in the general trash. I asked if Vic's had conducted a HW determination on the waste paper disposable wipes, to which I received the response from Mr. Scott Wagenknecht that he understood that the dried waste paper disposable wipes were inert and therefore non-RCRA hazardous. He stated that Vic's generated fewer than five waste paper disposable wipes daily. I provided compliance assistance literature regarding the solvent-contaminated wipes rule. Mr. Bill Wagenknecht stated during the exit briefing that Vic's would begin managing the paper disposable wipes in accordance with the conventions described in the compliance assistance literature. After further reflection, I have determined that a HW determination should have been conducted on the waste paper disposable wipes prior to managing them in accordance with the solvent-contaminated wipes rule, therefore: **Vic's must conduct an adequate HW determination on the waste paper disposable wipes in accordance with the provisions of 40 CFR §262.11 (NOPF #4) (added after the CEI).**

Waste Painting Materials: Mr. Bill Wagenknecht stated that Vic's uses a variety of products to prepare parts for painting, e.g., sandpaper, masking tape, paper and plastic sheeting, body filler, and buffing pads. He stated that generation rates of waste painting materials varied, depending upon business cycles. Mr. Scott Wagenknecht added that waste plastic cups are generated in the painting area. The waste plastic cups are used to hold paint products in a pot dispenser connected to an air hose. He stated that the waste plastic cups are RCRA-empty at the point of generation. He added that paper is used to protect the floor and sides of the paint booths during painting operations. Dried paint is collected on the surface of the paper. He stated that the waste painting materials are non-RCRA hazardous, based upon product and process knowledge and are disposed in the general trash.

Waste Paint Booth Filters: Mr. Ganka stated that Vic's generates approximately 60 square feet of waste paint booth filter material (one strip approximately 3 feet by 20 feet) every three weeks, or as required by painting booth Magnetometer readings. He stated that the dry waste paint booth filter material is disposed in the general trash and has been determined to be non-RCRA hazardous, by virtue of product and process knowledge.

General Trash: Mr. Bill Wagenknecht stated that Vic's generates approximately six cubic yards of general trash weekly. The general trash consists of miscellaneous paper waste, food waste, packing materials, cardboard, waste painting materials, etc. Mr. Bill Wagenknecht stated that ABC Disposal Systems (ABC), 3001 Industrial Park Road, Iowa City, Iowa, picks up and transports the waste to the Iowa City Landfill and Recycling Center (ICLRC), 3900 Hebl Ave SW, Iowa City, Iowa. Mr. Bill Wagenknecht stated that the general trash had been determined to be non-RCRA hazardous, by virtue of product and process knowledge.

Waste Floor Dry Absorbent: Mr. Bill Wagenknecht explained that fluids, e.g., oil and anti-freeze, sometimes leak from damaged vehicles that are towed to the facility for repair. He stated that Vic's uses kitty litter to absorb spilled fluids and any spills are cleaned up from the parking lot immediately. He added that the waste floor dry absorbent material is disposed in the general trash. He stated that generation rates were episodic and were difficult to quantify. However, he stated that the waste floor dry absorbent was non-RCRA hazardous, by virtue of product and process knowledge.

Used Tires: Mr. Bill Wagenknecht stated that used tires are occasionally generated from wrecked and damaged vehicles. The used tires are recycled by Liberty Tire Recycling, LLC, 1914 E. Euclid Avenue, Suite A, Des Moines, Iowa.

Waste Lead-Acid Batteries: Mr. Bill Wagenknecht stated that waste lead-acid batteries are occasionally generated from wrecked and damaged vehicles. The waste lead-acid battery cores are exchanged for new lead-acid batteries by Interstate All Battery Center, 1709 2nd Street, Coralville, Iowa, in accordance with the provisions of 40 CFR Part 266, Subpart G.

Scrap Metal: Mr. Bill Wagenknecht stated that Kyle Wagner from Amana, Iowa, periodically picks up scrap metal and transports it to Alter Metal and Recycling-Cedar Rapids, Cedar Rapids, Iowa, for recycling. He added that scrap metal generation rates vary, according to business cycles.

4.4 Visual Inspection of Facility Waste Stream Management

A visual inspection of the facility was conducted to observe waste stream management practices and document regulatory compliance. Photographs, checklists, and field notes were used to document observations made during the visual inspection. A Photo Log was created, and photos taken during the inspection appear in Attachment 15.

I observed a flammables cabinet located inside the paint kitchen (Photo 1). Two funnels were affixed to the top of the cabinet (Photo 2) The funnels were connected to two pipes that extended from the funnels, through the top of the flammables cabinet, to the inside of the flammables cabinet, into two five-gallon containers as shown in Photo 3. The top five-gallon container was used to collect non-RCRA hazardous aqueous paint waste; the bottom five-gallon container was used to collect HW waste solvent and any generated waste primer. The five-gallon containers were open: the aqueous paint container appeared to be less than one-third-full; the waste solvent container had approximately four inches of liquid waste solvent in the bottom of the container. Mr. Scott Wagenknecht stated the five-gallon container of waste aqueous paint was transported weekly from the paint kitchen to a 55-gallon drum located outside the facility and the container of liquid waste solvent was transported weekly to a solvent reclamation unit located outside the paint kitchen.

I observed that the closed flammables cabinet reduced solvent volatilization, but the

cabinet was not airtight. Mr. Urban and I recommended that the five-gallon container used to collect the waste solvent through the funnel and pipe be changed to a used product container with a smaller opening spout. We also recommended that the pipe leading from the funnel into the container be removed at the end of the shift and the container be closed with the product cap originally provided with the container. Vic's personnel immediately implemented these recommendations as shown: Photo 10 shows a new five-gallon container located inside the flammables cabinet. The pipe entering the spout opening of the container was connected to the funnel on top of the cabinet. Although the spout opening and pipe entering the container was not air-tight, it was an improvement over the previous condition. Photo 11 shows the pipe disconnected from the funnel and removed from the spout of the container; the container was capped. Photo 12 is a close-up photo of the container as it would appear a being closed after each shift. Mr. Bill Wagenknecht stated that this practice would be implemented during future facility operations.

I observed plastic paint cups on the top of the flammables cabinet (Photo 4) that contained small amounts of waste clearcoat and hardener. The contents of the plastic paint cups were not in a liquid state. Mr. Scott Wagenknecht stated that the contents of the cups hardened within minutes due to the properties of the clearcoat and hardener. This process did not occur as the result of evaporation. Once hardened, the plastic cups and contents would be disposed in the general trash at the end of the day.

I observed a paint gun parts washer, shown in Photo 5. Mr. Scott Wagenknecht stated that the paint gun parts washer was not used to clean paint guns. It had been provided by a paint vendor as a business promotional item. Instead of using the paint gun parts washer, paint guns were cleaned using disposable paper wipes and small quantities of the professional lacquer thinner product (Attachment 14) shown in Photo 6. The waste disposable paper wipes were disposed in a general trash container located inside the paint kitchen as discussed above.

I observed an empty five-gallon step can located outside the paint kitchen. I discussed the potential use for this step can to manage solvent-contaminated disposable wipes. Compliance assistance literature was provided on this subject during the exit briefing.

I observed a five-gallon solvent reclamation unit (Photo 7) located outside the paint kitchen. I observed a five-gallon container inside the solvent reclamation unit. The five-gallon container had approximately two inches of solid residue from in the bottom of the container (Photo 8). Once again, I discussed the nature of the solid residue with Messrs. Wagenknecht and Ganka. I reiterated that the solid residue carried the F005 HW listing and even De Minimis amounts of HW were not allowed in Iowa landfills.

I observed two closed, unlabeled 55-gallon drums stored outside the facility. One 55-gallon drum was full, and the other 55-gallon drum was approximately one-third-full of waste aqueous paint (Photo 9). Mr. Ganka stated that Stericycle picked up the 55-gallon drums and manifested them off-site as discussed above.

4.5 Documentation

Two uniform hazardous waste manifests (UHWM) were reviewed. UHWM #0122466683FLE identified one shipment of 1,015 pounds of DOT UN1263, Waste Paint, waste codes D001, and D035 characteristic and F003 and F005 listed HW, that was picked up and manifested off-site on 6/11/2020. UHWM #010480472FLE was prepared for HW picked up on 8/24/2017 and was illegible, apart from “2 Drums” and “Waste Codes D001, F003, F005, and D035”.

5.0 SUMMARY

I provided compliance assistance literature regarding solvent-contaminated wipes that appeared to be of potential benefit to the facility. After further discussing the rule, Mr. Bill Wagenknecht stated that Vic’s would manage the waste paper disposable wipes as solvent-contaminated wipes in the future. He added that the empty five-gallon step can observed outside the paint kitchen would be moved from outside the kitchen to inside the paint kitchen and would be managed to meet the conditions of the solvent-contaminated wipes rule.

We summarized the compliance assistance activities implemented during the inspection to improve management of the five-gallon container of waste solvent that was located inside the flammable’s cabinet inside the paint kitchen.

The following NOPF were added after the CEI:

NOPF #1-4: 40 CFR §262.11: Conduct an adequate HW determination of:

- **the waste primer/thinner/sealer waste stream;**
- **the clearcoat/hardener waste stream;**
- **the mixed waste solvent and still bottoms waste stream; and**
- **the waste paper disposable wipes used with lacquer thinner and disposed in the general trash.**

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

HURLEY BRYANT
(Affiliate)

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Date: 11/23/2021

H. D. "Doug" Bryant, CPP, PCI
Civil Investigator, NOWCC/SEE

AMBER WHISNANT

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Date: _____

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

Attachments:

- 1) Facility Satellite Photo (1 page)
- 2) Confidentiality Notice (1 page)
- 3) Receipt of Document and Samples (1 page)
- 4) Hazardous Waste Site Info Verification Report for Inspector (1 page)
- 5) Safety Data Sheet (SDS), Envirobase HP (17 pages)
- 6) SDS, T494 Envirobase Thinner (12 pages)
- 7) SDS, Corrosion Resistant Primer-Gray (18 pages)
- 8) SDS, Corrosion Resistant Primer Catalyst (16 pages)
- 9) SDS, Mid-Temp Reducer (15 pages)
- 10) SDS, A-Chromatic Sealer-White (10 pages)
- 11) SDS, Standard Undercoat Hardener (16 pages)
- 12) SDS, EN-V Performance Clearcoat (14 pages)
- 13) SDS, Standard Hardener (16 pages)
- 14) SDS, Primer Grade Thinner, AV-5700-55G (17 pages)
- 15) Photo Log (2 pages) and Visual Inspection Photos (12 pages)