

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

TRIMARK CORPORATION

500 Bailey Avenue
New Hampton, Iowa 50659
641-394-3188 ext. 1054

EPA ID Number: IAT200010015

On

June 4, 2024

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 Trimark Corporation (Trimark) at 500 Bailey Avenue, New Hampton, 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 results of the CEI.

PARTICIPANTS

Trimark:

Matt Anderson, Environmental, Health and Safety Engineer
Craig Helton, Director of Operations (Exit Briefing only)
Michael O'Donnell, Manufacturing Engineer

Toeroek Team:

Clifford Nelles, Inspector, 816-213-5192

INSPECTION PROCEDURES

Prior to the CEI at Trimark on June 4, 2024, I conducted a drive-by visual inspection. I did not observe any areas of concern during the drive-by. Upon my arrival, I entered the visitor's entrance and explained the purpose of the CEI to the reception attendant. I suggested that Mr. Lynn Hopp may be the correct point of contact, as he was listed as the Site Contact on the Notification Acknowledgement/Verification Report (Verification Report) provided by EPA (Attachment 1). The reception attendant stated that Mr. Hopp was not in the office that day as he was returning from training in China. The attendant contacted Mr. Anderson, who along with Mr. O'Donnell met me in a conference room in the lobby approximately five minutes later. I introduced myself to Messrs. Anderson and O'Donnell, explained the purpose of the CEI, and proceeded to conduct an entry briefing with them.

During the entry briefing, I presented my business card and EPA credentials to Messrs. Anderson and O'Donnell. 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. Anderson 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. Anderson and O'Donnell 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. Anderson during the inspection:

- RCRA Facility Access Information Sheet
- RCRA Section 3007
- U.S. Federal Codes 1001 and 1002
- Notice Regarding Proprietary/Confidential Business Information
- Notice of Responding to a Notice of Preliminary Findings

The following handouts were emailed to Mr. Anderson after the CEI.

- 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 Verification Report with Mr. Anderson (Attachment 1). Based on this review, I made no changes to the Verification Report.

I conducted a visual inspection of the facility, accompanied by Messrs. Anderson and O'Donnell. Following the visual inspection, I reviewed facility records including hazardous waste manifests with land disposal restriction (LDR) notifications, safety data sheets (SDS), contingency plan, inspection records, 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. Anderson, O'Donnell and Helton. During the exit briefing, I provided a Receipt for Documents and Samples, which Mr. Anderson signed, acknowledging receipt (Attachment 2). I provided Mr. Anderson the Notice, which he signed indicating no confidential business information had been provided (Attachment 3). I also provided Mr. Anderson a Notice of Preliminary Findings (NOPF) (Attachment 4), which he signed to acknowledge receipt. A map of the facility obtained during the CEI is included in Attachment 5, and a Google Earth aerial photograph of the facility is included as Attachment 6. The 12 photographs taken during the CEI are in Attachment 7, of which 11 are described in this report.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

TriMark has been operating at its current location since approximately 1971. TriMark currently employs approximately 360 personnel who work one of three 8-hour shifts (7:00 a.m. to 3:00 p.m., 3:00 p.m. to 11:00 p.m., and 11:00 p.m. to 7:00 a.m.) Monday through Friday, with 12-hour shifts (6:00 a.m. to 6:00 p.m. and 6:00 p.m. to 6:00 a.m.) on weekends. The facility consists of a single building with approximately 195,000 square feet under roof (Attachment 5).

TriMark is a manufacturing facility dedicated to the production of door enclosure hardware and systems. TriMark performs steel stamping and machining, zinc die casting, plastic injection molding, zinc plating, chrome plating, assembly, and metal finishing. TriMark has an on-site wastewater treatment plant (WWTP) to treat process wastewater from plating and metal cleaning operations. The major raw materials used are carbon steel, zinc, plastic, copper cyanide, chromium, nickel, and acid. During the CEI, Mr. Anderson described TriMark's manufacturing processes.

Metal parts are stamped, machined, welded, and shaped at TriMark, generating scrap metal. TriMark ships the scrap metal to MDK Inc. (New Hampton, Iowa) or Alter Metal Recycling (Waterloo, Iowa) for recycling. Because it is recycled, the facility considers the scrap metal (carbon steel and zinc) exempt from the definition of solid waste per Title 40 *Code of Federal Regulations* (40 CFR) 261.4(a)(13). It is not discussed further in this report.

During the metal working processes, parts are cooled utilizing an oil- or water-based coolant. Used coolant is processed through an oil/water separator. Used oil from the separation process is collected in a used oil storage tank and collected for recycling. Used oil is managed according to 40 CFR 279. The wastewater from the oil/water separation process is transferred to the WWTP prior to discharge to the City of New Hampton publicly owned treatment works (POTW). The facility's WWTP includes holding tanks that feed a pH adjustment tank for neutralization. The wastewater then flows to a flocculation tank for clay polymer addition, and a clarifier for metal sludge settling. Sludge is pumped from the bottom of the clarifier to a sludge storage tower prior to filter press treatment. Effluent wastewater is routed to a final pH adjustment tank prior to discharge to the City of New Hampton POTW. Because the wastewater is discharged to the sanitary sewer, the facility considers it exempt from the definition of solid waste per 40 CFR 261.4(a)(1)(ii). It is not discussed further in this report. WWTP sludge is considered hazardous waste by the facility. Water-based coolants are also transferred directly to the WWTP prior to discharge to the city POTW.

After fabrication, parts to be plated are cleaned, plated, rinsed, and air dried. Some of the products used in the cleaning and plating processes include sodium cyanide and copper cyanide. The zinc plating process consists of 15 stages. After loading (stage 1), the parts are cleaned in a soak clean and electro clean (stages 2 and 3), followed by rinsing (stages 4 and 5). The parts are then dipped in acid (stage 6), which is followed by two final rinses (stages 7 and 8). The parts are then zinc plated (stage 9), followed by three plating rinses (stages 10, 11, and 12). The parts are then dipped into chromate (stage 13), followed by two final rinses (stages 14 and 15), prior to unloading. All rinse waters from the zinc plating process are treated in the on-site WWTP prior to discharge to the City of New Hampton POTW. Cyanide plating generates various waste paper filters and debris, which the facility considers hazardous waste.

The chrome/copper/nickel plating processes vary depending on the plating the product receives. The processes mirror the zinc plating process (cleaning, acid dip, and plating, with rinsing between each of the steps). All rinse waters from the chrome/copper/nickel plating process are also treated on-site prior to discharge to the New Hampton POTW. This nickel-plating process also generates waste paper filters and debris that are managed as hazardous waste.

Wastes generated during building maintenance include used lamps and spent batteries, both of which are managed as universal waste. In addition to the used oil from the oil-water separator, used oil generated from facility equipment maintenance (such as compressors) is also managed according to 40 CFR 279. The facility considers its general trash to be nonhazardous waste.

Trimark was last inspected by an EPA contractor on February 26, 2020, with the following preliminary findings.

- Failure to inspect a hazardous waste central accumulation area (HWCAA) on a weekly basis, as required by 40 CFR 262.17(a)(1)(v)
- Failure to label a hazardous waste accumulation container (HWAC) with the words "hazardous waste," as required by 40 CFR 262.17(a)(5)(i)(A)
- Failure to label a HWAC with an indication of the nature of the hazard as required by 40 CFR 262.17(a)(5)(i)(B)

- Failure to mark a HWAC in a HWCAA with a start date of accumulation, as required by 40 CFR 262.17(a)(5)(i)(C)
- Failure to review and amend a RCRA contingency plan when changes occur, as required by 40 CFR 262.17(a)(6) referencing 262.263(a) through 263(e)
- Failure to prepare a quick reference guide for the RCRA contingency plan as required by 40 CFR 262.17(a)(6) referencing 262.262(b)
- Failure to provide adequate aisle space in a HWCAA, as required by 40 CFR 262.17(a)(6) referencing 262.255
- Failure to label a satellite accumulation container (SAC) with an indication of the nature of the hazard, as required by 40 CFR 262.15(a)(5)(ii)
- Failure to have a start date to demonstrate the length of time of accumulation for a universal waste accumulation container, as required by 40 CFR 273.15(c)
- Failure to keep a universal waste lamps accumulation container closed, as required by 40 CFR 273.13(d)(1)
- Failure to label a universal waste batteries container with the words “universal waste batteries” or “waste batteries” or “used batteries,” as required by 40 CFR 273.14(a)

Failure to label a universal waste batteries container with the words “universal waste batteries” or “waste batteries” or “used batteries” is the only repeat from the previous inspection. 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.

2. RCRA Status

Trimark is identified as a large quantity generator (LQG) on the Verification Report provided by EPA (Attachment 1), generating more than 1,000 kilograms (kg) or 2,200 pounds of hazardous waste per month. Based on my review of the facility’s manifests generated over the previous three years, the 2023 Biennial Report (Attachment 8), information provided by Mr. Anderson, I concluded that the facility generates approximately 11,479 pounds (5,218 kg) per month of its wastewater treatment sludge alone. Therefore, I concluded Trimark operating as a LQG of hazardous waste and inspected the facility as such. I also inspected the facility as a used oil generator and a SQH of universal waste (accumulating less than 5,000 kg or 11,000 pounds of universal waste at any time).

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. Messrs. Anderson and O’Donnell accompanied me throughout the CEI. All participants were provided a copy of U.S. Federal Codes 1001 and 1002.

Wastewater treatment sludge is generated from the wastewater treatment plant sludge press and occasional plating bath residue from tank cleanouts. The facility considers this waste hazardous (D007, F006, and F008) based on product and process knowledge. Copies of the SDSs for wastewater treatment chemicals (Hydrite 1016, sulfuric acid, and caustic soda liquid) are included as Attachments 9 through 11. Wastewater treatment sludge is accumulated in 1-cubic-yard HWACs (sacks) in the wastewater treatment plant. Based on my review of 2023 Biennial Report (Attachment 8, page 4, Generation and Management [GM] waste 2), TriMark generates approximately 11,479 pounds (5,207 kg) of this waste per month. Wastewater treatment sludge is shipped to Evoqua Water Technologies in Roseville, Minnesota, MND981098478, for stabilization and landfill disposal.

During the CEI, I observed a 1-cubic-yard sack attached to the sludge press (Attachment 7, Photograph 5). The sack was labeled with the words “hazardous waste” and an indication of the nature of the hazard, dated June 3, 2024, and was approximately ½ full. I did not observe any deficiencies related to wastewater treatment sludge during the CEI.

Waste nickel-plating papers and debris is generated from the nickel-plating bath filtering operation. The facility considers this waste hazardous (D007, D008) based on product and process knowledge. Based on my review of 2023 Biennial Report (Attachment 8, page 4, GM waste 3), TriMark generates approximately 62 pounds (28 kg) of this waste per month. The waste is accumulated in 55-gallon SACs near the point of generation. Waste nickel-plating papers and debris are shipped to Evoqua Water Technologies in Roseville, Minnesota, MND981098478, for metal recovery and incineration.

During the CEI, I observed a SAC of waste nickel-plating papers and debris in the nickel-plating bath filtering operation (Attachment 7, Photograph 3). The SAC was structurally sound, near the point of generation, under control of the operator, labeled with the words “hazardous waste” and an indication of the nature of the hazard, closed and held approximately 20 gallons of nickel plating papers and debris. I did not observe any deficiencies related to waste nickel-plating papers and debris during the CEI.

Cyanide papers and debris is generated during the copper plating bath filtering operation. The facility considers this waste hazardous (D007, F007) based on product and process knowledge. After the CEI Mr. Anderson emailed me the SDSs for Copper Cyanide, Copperlume CL-4 Adjuster, Copperlume CL-4, and Sodium Cyanide (Attachments 12 through 15). Based on my review of 2023 Biennial Report (Attachment 8, page 4, GM waste 1), TriMark generates approximately 28 pounds (13 kg) of this waste per month. The waste is accumulated in 55-gallon SACs near the point of generation. Cyanide papers and debris are shipped to Evoqua Water Technologies in Roseville, Minnesota, MND981098478, for metal recovery and incineration.

During the CEI, I observed a SAC of cyanide papers and debris in the copper plating bath filtering operation (Attachment 7, Photograph 4). The SAC was structurally sound, near the point of generation, under control of the operator, labeled with the words “hazardous waste” and an indication of the nature of the hazard, closed and held approximately 25 gallons of copper cyanide plating papers and debris. I noted no deficiencies with management of waste cyanide papers and debris during the CEI.

Used oil is generated by cooling and polishing metal, and is separated from the wastewater stream through use of an oil-water separator. Used oil and absorbents are also generated from facility maintenance. The facility manages used oil according to 40 CFR Part 279. Based on my review of shipping documents, TriMark generates approximately 1,000 gallons per year (83 gallons per month). Used oil is collected Safety-Kleen of Des Moines, Iowa, for recycling.

During the CEI, I observed the oil-water separator and used oil storage tank adjacent to the shipping dock (Attachment 7, Photographs 1 and 2). Both the oil-water separator and the used oil storage tank appeared to be structurally sound with no apparent damage or leaks, and were labeled with the words “used oil.” The used oil storage tank held approximately 1,000 gallons of used oil. I noted no deficiencies with management of used oil during the CEI.

Used lamps are generated by maintenance replacing spent lamps throughout the facility. The facility manages used lamps as universal waste according to 40 CFR Part 273. According to Mr. Anderson, the facility generates approximately 15 used lamps per month. Used lamps are collected by Safety-Kleen of Des Moines, Iowa, for recycling.

During the CEI, I observed a universal waste lamps accumulation container in the room adjacent to the tool room (Attachment 7, Photographs 6 and 7). The universal waste accumulation container held approximately 100 used lamps and was structurally sound, closed, labeled with the words “universal waste lamps,” and dated May 15, 2024. I noted no deficiencies in the management of used lamps during the CEI.

Spent batteries are generated by maintenance replacing batteries in equipment throughout the facility. The facility manages spent batteries as universal waste according to 40 CFR Part 273. According to Mr. Anderson, the facility generates approximately 10 spent batteries per month. Spent batteries are collected by Safety-Kleen of Des Moines, Iowa, for recycling.

During the CEI, I observed a 5-gallon universal waste batteries accumulation container for spent nickel-cadmium (Ni-Cd) batteries and a 2-gallon universal waste batteries accumulation container for spent lithium batteries in the room adjacent to the tool room (Attachment 7, Photographs 9 and 10). Both containers were labeled with the words “used batteries” and dated (February 9, 2024, for spent Ni-Cd batteries and January 10, 2024, for spent lithium batteries).

I also observed a 20-gallon universal waste batteries accumulation container in the room adjacent to the tool room (Attachment 7, Photograph 8). The universal waste accumulation container held approximately 15 lead-acid batteries and was dated July 11, 2023. However, the universal waste accumulation container was labeled as lead-acid batteries, and not “universal waste batteries” or “waste batteries” or “used batteries,” as required by 40 CFR 273.14(a) (**NOPI No. 1**). I provided compliance assistance regarding management of universal waste batteries. During the CEI, employees of Trimark labeled the container with the words “used lead acid batteries” (Attachment 7, Photograph 12).

General trash consists of nonhazardous production wastes, packaging wastes, and general office-type refuse. General trash is considered nonhazardous and is accumulated in roll-off

containers outside the facility. General trash is collected for disposal by Hawkeye Waste for landfilling. I did not observe any deficiencies related to general trash. During the CEI, I observed accumulation of general trash and noted no deficiencies.

4. Required Response Equipment and Hazard Management

Per 40 CFR 262.15(a)(8) and 262.17(a)(6), a LQG 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

Trimark maintains two HWCAAs—one in Cold Storage the other in the WWTP at the sludge press (Attachment 5). At the time of the CEI, the HWCAA in Cold Storage was empty. I asked Mr. Anderson when the last shipment of hazardous waste occurred. He stated that the last shipment occurred on June 3, 2024, the day before the CEI.

At the WWTP sludge press, I observed a 1-cubic-yard sack of wastewater treatment sludge (Attachment 7, Photograph 5). The sack was labeled with the words “hazardous waste” and an indication of the nature of the hazard, attached to the press, dated June 3, 2024, and was approximately ½ full.

According to Mr. Anderson, the HWCAA is inspected weekly, and a log is updated for each inspection. I reviewed the three years of inspection logs and verified that the inspections were conducted on a weekly basis. I did not observe any gaps of longer than one week in the inspection logs. A copy of the inspection log for May 20, 2024, through June 3, 2024, is included as Attachment 16. I asked Mr. Anderson how someone would summon emergency assistance in the HWCAA. He stated that all of the workers who handle hazardous waste carry two-way radios.

6. Manifests and Biennial Report

Trimark generated uniform hazardous waste manifests for 33 hazardous waste shipments from the three-year period of June 04, 2021, to June 04, 2024. During the CEI, I reviewed all of the manifests and LDR notifications from this three year period. Copies of the manifests for shipments dated February 09, 2024, April 29, 2024 and June 03, 2024, are included as Attachment 17 as examples. In reviewing the manifests, I noted that the generator’s initial copy of the manifest for the shipment on June 03, 2024 (Attachment 17, page 3) was not signed or dated by the generator, as required by 40 CFR 262.23(a) (**NOPF No. 2**). I asked Mr. Anderson if he knew how this happened. He stated that he did not know how it happened.

NOPF No. 2 was not initially left with the facility at the time of the CEI, but was added on June 17, 2024. Mr. Anderson and Mr. Hopp were notified by email on June 17, 2024.

The facility submitted its 2023 Hazardous Waste Biennial Report on February 07, 2024 (Attachment 8).

7. Preparedness and Prevention Plan

LQG facilities are required by 40 CFR 262.17(a) to meet the emergency preparedness, prevention, and procedures requirements including documented arrangements with response agencies. According to Mr. Anderson, Trimark is the subject of a regular inspection by the New Hampton 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.

The facility's contingency plan was last updated April 29, 2024. I reviewed the contingency plan against the content requirements of 40 CFR 262.261. I noted the contingency plan included a description of actions needed to respond to fires, explosions, and spills, a description of arrangements with the local emergency agencies, a list of emergency response equipment (including capabilities and location), and a complete evacuation plan with a description of the signals used, as required by 40 CFR 262.17(a)(6) referencing 262.261(a, c, e, and f). The contingency plan included telephone numbers of the primary emergency coordinator, Mr. Lynn Hopp (Vice President), and the alternate emergency coordinator, Mr. Anderson, as required by 40 CFR 262.17(a)(6) referencing 262.261(d). A copy of the contingency plan contact information is included as Attachment 18.

The contingency plan also included a quick reference guide, as required by 40 CFR 262.17(a)(6) referencing 262.262(b). I noted no deficiencies with the facility's emergency preparedness, prevention, and procedures during the CEI, including content of the contingency plan and quick reference guide.

8. Personnel Training Requirements

Personnel training is required by LQG regulations specified in 40 CFR 262.17(a)(7) to ensure that employees are thoroughly familiar with proper waste handling procedures relevant to their responsibilities. During the CEI, I asked Mr. Anderson 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. He also stated that annual refresher training is conducted. I asked Mr. Anderson who conducts the training. He stated that he conducts all training in person. I reviewed the training records for the last three years for Messrs. Hopp, Anderson and Ms. Jessica Usher (Wastewater Treatment Operator) and noted no deficiencies. Copies of the 2021, 2022 and 2023 training records for Ms. Usher are included in Attachment 19 as examples.

I reviewed the written job descriptions for Messrs. Anderson, Hopp and O'Donnell and noted that they appeared to meet requirements of 40 CFR 262.17(a)(7)(iv). A copy of the Contingency Plan section detailing job descriptions for hazardous waste management positions is included as Attachment 20.

9. Air Emissions: 40 CFR Part 265 Subparts AA, BB, CC

EPA regulations in 40 CFR Part 265, Subparts AA, BB, and CC apply to LQGs. If a LQG manages hazardous waste with an organic concentration greater than 10 parts per million by weight (ppmw), the standards specified in Subpart AA apply to hazardous waste air emissions from certain process vents. A process vent used in distillation, fractionation, solvent extraction, thin-film evaporation, air stripping, or steam stripping is regulated by Subpart AA. Trimark is not subject to the Subpart AA regulations because the facility does not have any of the process vents listed above.

If a LQG has equipment that contains or contacts hazardous waste composed of 10 percent or greater organics by weight, the facility is subject to Subpart BB standards for inspection and monitoring of the equipment. Trimark is not subject to the Subpart BB regulations because it does not have equipment that contains or comes in contact with hazardous waste.

The standards found in Subpart CC apply to LQGs that manage hazardous waste in containers with organic compounds (VOC) concentration that exceeds 500 ppmw. The Subpart CC standards are applicable because the facility accumulates hazardous waste that contains VOCs in 55-gallon HWACs. During the CEI, I determined that Trimark meets the Subpart CC requirements for containers by using Container Level 1 controls (HWACs smaller than 122 gallons that are Department of Transportation [DOT]-approved). I noted no concerns with management of hazardous waste per the Subpart CC air emissions requirements.

10. Summary of Preliminary Findings

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

- Failure to label a universal waste batteries container as “Universal Waste Batteries” or “Waste Batteries” or “Used Batteries” as required by 40 CFR 273.14(a) (**NOPF No. 1**).
- Failure to sign and date a uniform hazardous waste manifest as required by 40 CFR 262.23(a) (**NOPF No. 2**)

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

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A. Nelles
Date: 2024.07.25
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Clifford A. Nelles, Inspector
CLAENE Group

AMBER WHISNANT

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Date: _____

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

Attachments:

1. Notification/Acknowledgement Verification Report (2 pages)
2. Receipt for Documents and Samples (1 page)
3. Confidentiality Notice (1 page)
4. Notice of Preliminary Findings (1 page)
5. Site Map (1 page)
6. Google Earth Aerial Photograph (1 page)
7. Photographic Documentation (Photolog and 12 Photographs) (8 pages)
8. Copy of 2023 Biennial Report (8 pages)
9. Copy of SDS for Hydrite 1016 (7 pages)
10. Copy of SDS for Sulfuric Acid 66 DEG (7 pages)
11. Copy of Caustic Soda Liquid 50% Membrane Cell (7 pages)
12. Copy of SDS for Copper Cyanide (8 pages)
13. Copy of SDS for Copperlume CL-4 Adjuster (11 pages)
14. Copy of SDS for Copperlume CL-4 (14 pages)
15. Copy of SDS for Sodium Cyanide (7 pages)
16. Copy of Inspection Log Dated May 20 to June 03, 2024 (1 page)
17. Copies of Uniform Hazardous Waste Manifests dated February 09, April 29, and June 03, 2024 (3 pages)
18. Copy of Contingency Plan Contact List (1 page)
19. Copies of Training Records for Jessica Usher (3 pages)
20. Copy of Job Descriptions for Hazardous Waste Management Positions (3 pages)