REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

Integrated DNA Technologies
2501 Crosspark Road
Coralville, Iowa 52241

EPA ID Number: IAR000525147

On

September 14, 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 Integrated DNA Technologies (IDT) located in Coralville, Iowa, on September 14, 2021. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. During the CEI, I collected the informationand 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

IDT:

Heath Hospodarsky, Chemical Compliance Specialist, approximately 10 years with IDT.

Emily James, Environmental, Health and Safety Manager, approximately four months in current position and four years with IDT.

Eric Bauer, Senior Director, Environmental, Health and Safety, approximately three weeks with IDT.

Chris Wadsinger, Laboratory Technician, unknown years of employment with IDT.

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)

Mark Holcomb, Civil Investigator, NOWCC/SEE, ECAD/Chemical Branch/RCRA Section (Observer)

3.0 INSPECTION PROCEDURES

Due to the COVID-19 pandemic, I contacted the facility via telephone September 3, 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 IDT on September 13, 2021, searching for areas of concern observable from the adjacent roadway. I identified no obviousenvironmental issues or concerns during this preliminary examination.

Our team of inspectors arrived at IDT at approximately 0830 hours, September 14, 2021. We were met at the entrance of Suite D by a Security Officer. We signed a visitor log and were met at the entrance area by Mr. Heath Hospodarsky, identified as the site contact, and Ms. Emily James. Trevor Urban presented his EPA credentials, and I explained the purpose and procedures of the inspection. We proceeded to a conference room that was used throughout the CEI. We were joined by Mr. Eric Bauer. We provided the attendees our business cards; the IDT personnel did not have business cards to exchange. Mr. Bauer participated in the entry and exit briefings and Ms. James and Mr. Hospodarsky participated throughout the CEI.

I next presented Ms. James and Messrs. Bauer and Hospodarsky 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. Ms. James 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 obtained a layout diagram of the facility during the entry briefing (Attachment 1). I annotated this diagram while conducting a visual inspection of all laboratories located inside Suites D and E of the multi-tenant facility located at 2501 Crosspark Road, a HW storage area located inside Suite D; and a HW storage area located outside the facility.

Document photocopies and 1 8 photographs were collected as inspection documentation (Attachments 1-45). Information collected during the CEI is recorded on a checklist (Attachment 45) 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 Ms. James and Messrs. Hospodarsky and Bauer. I provided Ms. James a *Confidentiality Notice,* which she signed, indicating no

confidentiality claims were made by the facility (see Attachment 2). I provided Ms. James a *Receipt of Documents and Samples* and a *Notice of Preliminary Findings* (NOPF), which she signed acknowledging receipt (see Attachments 3 and 4).

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)
Recycling Electronics (IDNR Handout)
Lead-Based Paint Activities (IDNR Handout)
Excluded Solvent-Contaminated Wipe Rule (IDNR Handout)
Battery Recycling/Disposal (IDNR Handout)
Management of Fluorescent Lamps for Businesses (IDNR Handout)
Incompatible Chemicals (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)
Requirements for Used Oil Management Standards (EPA Handout)
Emergency Response Program (EPA Handout)
Security Awareness (EPA Handout)
Chemical Facility Anti-Terrorism Standards (Homeland Security Handout)
Instructions for Responding to a Notice of Preliminary Finding (NOPF) (EPA Handout)
Managing Your Hazardous Waste: A Guide for Small Business (EPA Handout)

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

This facility is one of three facilities operated by IDT in the Coralville, Iowa area. One larger facility, located at 1710 Commercial Park (IAD984567818), manufactures DNA products, and employs more than 700 employees. A second facility is located at 2660 Crosspark Road (IAR000500256) and is involved in enzyme research and development (R&D). This inspected facility is in a multi-tenant building located in a research park setting that is owned by the University of Iowa. IDT occupied this facility in 2019. IDT conducts DNA R&D in multiple laboratories that are operated by approximately 58 personnel, working one shift, Monday-Friday. The leased area occupies approximately 32,000 square feet under roof. The North American Industry Classification System (NAICS) code for this facility is 325199 – All Other Basic Organic Chemical Manufacturing.

4.2 RCRA Status

This is the first RCRA compliance inspection of this facility. The facility notified the EPA on December 13, 2019, that it is a Small Quantity Generator (SQG) of D001 and D002 characteristic and F002, F003, F004, and F005 listed HW. However, it was determined that the facility was operating as a Very Small Quantity Generator (VSQG) of HW at the time of this inspection and the facility status was updated (Attachment 5). The facility generates spent fluorescent lamps that are taken to and managed as universal waste (UW) at the larger IDT facility located at 1710 Commercial Park. The facility does not generate any used oil. The facility manages solvent-contaminated wipes as HW.

4.3 Facility Waste Streams and Management

IDT has contracted Univar Solutions ((Univar), 6000 Parkwood Place, Dublin, Ohio to manage the disposition of HW generated by the facility. The designated facilities receiving HW are Tradebe Treatment and Recycling (Tradebe) (IND000646943), 4343 Kennedy Avenue, East Chicago, Indiana and AES Asset Corporation, DBA Clean Earth (Clean Earth) (KYD985073196), 1689 Shar-Cal Road, Calvert City, Kentucky.

The following waste streams are managed by IDT:

Solvent Mixture: Shipping Description UN1992, Waste Flammable Liquid, generated by chemical synthesis (Attachment 6). IDT manages this waste stream as D001 and D038 characteristic and F002, F003, and F005 listed HW, based upon product and process knowledge. Mr. Hospodarsky stated that IDT generates between 80-100 pounds of this waste stream monthly. This waste stream is manifested off-site by Univar and transported to Tradebe or Clean Earth for fuel blending. The primary constituents of this mixture include methanol (Attachment 7); acetone (Attachment 8); heptane (Attachment 9); hexanes GR ACS (Attachment 10); ethanol SDA1, anhydrous (Attachment 11); acetonitrile (Attachment 12); dichloromethane (Attachment 13); toluene (Attachment 14); methylimidazole (Attachment 15); pyridine (Attachment 16); ethyl acetate (Attachment 17); and acetic acid (Attachment 18).

Water Trace Solvents: Shipping Description non-DOT Regulated Material, generated by the removal of water from bulk acetonitrile solvent tank system (Attachment 19). IDT manages this waste stream as non-regulated aqueous waste, based upon product and process knowledge. Mr. Hospodarsky stated that IDT generates approximately two 55-gallon containers of this waste stream monthly. This waste stream is manifested off-site by Univar and transported to Tradebe or Clean Earth for disposal. The primary constituents of this mixture include acetonitrile (Attachment 12); triethylamine (Attachment 20); hexafluoroisopropanol (Attachment 21; acetic acid (Attachment 18); ammonium chloride (Attachment 22); ethylenediaminetetraacetic acid (Attachment 23); methanol (Attachment 7); sodium chloride (Attachment 24); and TRIS hydrochloride (Attachment 25).

RNA Extraction By-Product and Debris: Shipping Description UN2924 Waste Flammable Liquid, Corrosive, generated by RNA extraction from mammalian cells

(Attachment 26). IDT manages this waste stream as D001 characteristic HW, based upon product and process knowledge. Mr. Hospodarsky stated that IDT generates less than 10 pounds of this waste stream monthly. This waste stream is manifested off-site by Univar and transported to Tradebe or Clean Earth for fuel blending. The primary constituents of this waste stream include ethanol SDA1, anhydrous (Attachment 11); isopropanol (Attachment 27); and reagent cartridge, virus mini (Attachment 28).

2x Hybridization Buffer: Shipping Description UN2810, Toxic, liquids, organic, n.o.s. (Tetramethylammonium chloride), generated as part of next generation sequencing (NGS) to determine the order of nucleotides in target regions of DNA or RNA (Attachment 29). IDT manages this waste as non-RCRA hazardous waste, based upon product and process knowledge. Mr. Hospodarsky stated that IDT generates approximately one 55-gallon container of this waste every two to three months. This waste stream is manifested off-site by Univar and transported to Tradebe or Clean Earth for disposal. The primary constituents of this waste stream include plastic (disposable filter apparatus, weigh boats, gloves, and bottles); hybridization buffer (Attachment 30); glass bottles (empty tetramethylammonium chloride containers; tetramethylammonium chloride (Attachment 31); paper goods; and water.

Lab Cleanup: Shipping Description Non-DOT Regulated Material, generated during general lab cleanup, debris, sweepings, and personal protective equipment (PPE) (Attachment 32). According to Mr. Hospodarsky, IDT manages this waste as non-RCRA hazardous waste, based upon product and process knowledge. Mr. Hospodarsky stated that IDT generates approximately one 55-gallon container of this waste every two to three months. This waste stream is manifested off-site by Univar and transported to Tradebe or Clean Earth for disposal. The hazardous waste profile identifies the primary constituents of this waste stream as acrylamide paste (Attachment 33); debris, dirt, plastic, and paper; absorbents and spill pigs; and PPE.

My review of the acrylamide safety data sheet (SDS) (Attachment 33) during the preparation of this report revealed that IDT's waste stream profile for lab cleanup did not consider that acrylamide is a U007 listed HW. I reviewed all IDT HW shipping manifests and did not identify any shipments containing acrylamide or any shipments containing U007 listed HW. I reached out to IDT via email requesting clarification of the characterization of this waste stream. Ms. James responded in email that IDT has not shipped any waste using this profile and IDT does not currently use acrylamide for lab clean up (Attachment 34).

Silica Powder: Shipping Description Non-DOT Regulated Material, that is outdated or unused (Attachment 35). IDT manages this waste as non-RCRA hazardous waste, based upon product and process knowledge. Mr. Hospodarsky stated that IDT generates approximately one 55-gallon container of this waste every two to three months. This waste stream is manifested off-site by Univar and transported to Tradebe or Clean Earth for disposal. The primary constituents of this waste stream are quartz, manganese oxide, and amine salts.

Rags with Absorbed Solvents: Shipping Description UN3175 Waste Solids Containing Flammable Liquids (acetonitrile, ethyl acetate) (Attachment 36). IDT manages

this waste stream as D001 characteristic and F003 listed HW, based upon product and process knowledge. Mr. Hospodarsky stated that IDT generates less than 50 pounds of this waste stream monthly. This waste stream is manifested off-site by Univar and transported to Tradebe or Clean Earth for fuel blending. The primary constituents of this mixture include rags and wipes; acetonitrile (Attachment 12); dichloroethane (Attachment 13); pyridine (Attachment 16); ethyl acetate (Attachment 17); and molecular sieves (Attachment 37).

Glass Bottles: Shipping Description Non-DOT Regulated Material, that consists of RCRA-empty glass bottles (Attachment 38). IDT manages this waste as non-RCRA hazardous waste, based upon product and process knowledge. Mr. Hospodarsky stated that IDT generates approximately one 55-gallon container of this waste every two to three months. This waste stream is manifested off-site by Univar and transported to Tradebe or Clean Earth for disposal. The primary constituents of this waste stream are empty glass bottles previously containing solvents.

Fluorescent Lamps: Shipping Description Non-DOT Regulated Material, that consists of spent fluorescent lamps (Attachment 39). IDT manages this waste as UW. Mr. Hospodarsky stated that IDT generates approximately one spent four-foot fluorescent lamp every two months. Maintenance personnel assigned to the IDT facility located at 1710 Commercial Park (IAD984567818) remove the spent lamps and transport them to their facility where they are managed as UW.

Waste Alkaline Batteries: Mr. Hospodarsky stated that IDT purchases one EasyPak™ Battery Recycling Container from Terra Cycle Regulated Waste annually. The container is used to collect spent dry alkaline batteries in a large plastic bucket capable of holding 55 pounds of dry alkaline batteries. Postage is pre-paid, and the container of batteries is shipped off-site annually for recycling. Mr. Hospodarsky stated that the waste alkaline batteries are managed as UW.

General Trash: Ms. James stated that IDT generates approximately six cubic yards of general trash weekly. The general trash consists of miscellaneous paper waste, food waste, packing materials, etc. Ms. James stated that the landlord has contracted with ABC Disposal Systems (ABC), 3001 Industrial Park Road, Iowa City, Iowa to transport the waste to the Iowa City Landfill and Recycling Center (ICLRC), 3900 Hebl Ave SW, Iowa City, Iowa. Ms. James stated that the general trash had been determined to be non-RCRA hazardous, by virtue of product and process knowledge.

Waste Cardboard: Mr. Hospodarsky stated that IDT generates between three-six cubic yards of non-RCRA hazardous waste cardboard weekly. The waste cardboard is collected in a roll-off container designated for cardboard recycling. The waste cardboard is picked up by ABC and transported off-site to the ICLRC for recycling. Ms. James stated that the waste cardboard has been determined to be non-RCRA hazardous by virtue of product and process knowledge.

Miscellaneous Recycling: Mr. Hospodarsky explained that IDT collects light plastic and aluminum cans for recycling. The recycled materials are collected in containers throughout the facility. The recycled materials are transported to the recycling roll-off

container located outside the facility, where they are picked up by ABC and transported off-site to the ICLRC for recycling. Mr. Hospodarsky stated that the light plastic and aluminum cans has been determined to be non-RCRA hazardous by virtue of product and process knowledge.

Waste Nitrile Gloves and Single-Use Apparel: Mr. Hospodarsky explained that waste nitrile gloves and single-use apparel that are not contaminated by laboratory wastes and are thus non-RCRA hazardous, are collected in containers for a special recycling program. The RightCycle Program administered by Kimberly-Clark Professional is a large-scale recycling program for non-hazardous lab, cleanroom, and industrial waste. Used nitrile gloves and single-use apparel are sent to recyclers and turned into pellets that are used to create consumer products and durable goods such as flowerpots, lawn furniture, benches, and bicycle racks. Ms. James stated that IDT has generated approximately 14,000 pounds of used nitrile gloves and single-use apparel since joining this initiative approximately four years ago.

Waste White Office Paper: Mr. Hospodarsky stated that IDT uses the services of Shred-It Document Shredding to recycle white business paper. He did not know the rate of generation of waste white office paper, but estimated that one cardboard container, approximately three feet squared, was generated by IDT every three months. He added that the waste white office paper has been determined to be non-RCRA hazardous by virtue of product and process knowledge.

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 and field notes were used to document observations made during the visual inspection. A Photo Log was created describing photos taken during the inspection (Attachment 40). The facility layout diagram (Attachment 1) was annotated to identify the location of photos taken during the visual inspection. Photos taken during the CEI are documented in Attachment 41.

IDT collects waste nitrile gloves and single-use apparel for recycling as previously discussed. I observed one container of waste nitrile gloves shown in Photo 1, Attachment 41, and Attachment 1.

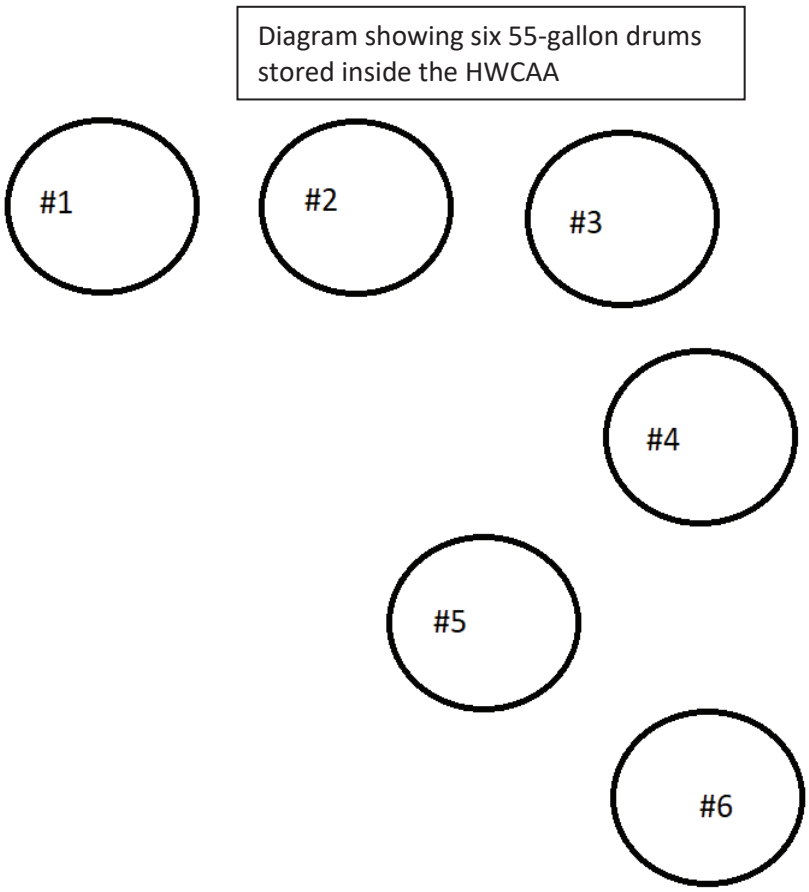
I observed several general trash and recyclable containers in the MOLE Lab 111, as shown in Photo 2, Attachment 41, and Attachment 1.

I observed a waste container of non-regulated waste stored inside a laboratory hood located inside the WAV Lab, E153, as shown in Photo 3, Attachment 41, and Attachment 1.

I observed a five-gallon step can filled with rags with absorbed solvents located in the WAV Lab, E153. IDT manages the solvent-contaminated wipes and absorbents as D001 characteristic and F003 listed HW. The container was closed, labeled to identify the nature of the waste, and labeled “HAZARDOUS WASTE” as shown in Photos 4 and 5, Attachment 41, and Attachment 1.

I observed a small bottle located inside a cabinet in the WAV Lab, E153. The bottle was dated "8/4/21" and marked with several labels as shown in Photo 6, Attachment 41, and Attachment 1. A "sticky note" was affixed to the bottle, with the instructions "Please Take to Lyn Lewis 2501" as shown in Photo 6. According to Chris Wadsinger, the bottle is mislabeled and contains product that is currently used in the WAV Lab. The bottle was originally transported from IDT's sister facility located at 1710 Commercial Park, after the contents of the bottle were rejected for use at that facility. The bottle had been labeled and earmarked for disposition as Scrap for a Lab Pack that was being collected at the 1710 Commercial Park facility. The contents of the bottle were repurposed and received by the WAV Lab on "8/21/21" and have been consistently used as a product for processes conducted within the WAV Lab since then.

The facility has one hazardous waste central accumulation area (HWCAA) located inside the facility as shown on Attachment 1. I observed six 55-gallon containers stored inside the HWCAA as described below:



Container #1 was a full 55-gallon drum of rags with absorbed solvents, managed as D001 characteristic and F003 listed HW. The container was dated "7/10/21" and the cinch ring designed to close the container was not tight. The container was labeled HAZARDOUS WASTE and displayed a pictogram describing the nature of the waste (Photo 7, Attachment 41, and Attachment 1).

Container #2 was a full 55-gallon drum filled with non-regulated glass bottles, dated "8/15/21" with a loose rim cinch ring (Photo 8, Attachment 41, and Attachment 1).

Container #3 was a full 55-gallon drum of RNA extraction waste, managed as D001 characteristic HW. The container was dated "6/30/21" and the rim cinch ring was loose. The container was labeled HAZARDOUS WASTE and displayed a pictogram describing the nature of the waste (Photo 9, Attachment 41, and Attachment 1).

Container #4 was a partially filled (less than ½-full) 55-gallon drum containing non-regulated silica waste, dated "9/9/21" with a loose rim cinch ring (Photo 10, Attachment 41, and Attachment 1).

Container #5 was a partially filled 55-gallon drum containing non-regulated aqueous waste with trace solvents, dated "9/9/21" with a closed funnel (Photo 11, Attachment 41, and Attachment 1).

Container #6 was a partially filled (approximately 1/3-full) of waste solvent mix, managed as D001 characteristic HW. The container was dated "7/15/21" and the bung was closed. A loose funnel was located on top of the container. The container was labeled HAZARDOUS WASTE and displayed pictograms describing the nature of the waste (Photo 12, Attachment 41, and Attachment 1).

Mr. Hospodarsky took immediate action and tightened all the loose rim cinch rings described above during the inspection.

Containers identified as satellite accumulation area (SAA) containers of solvent HW are located inside the SMC R&D laboratories in D141 and D109. The laboratories are connected, as shown in Attachment 1. During my visual inspection of the facility, I entered the D141 laboratory from Corridor D-1E. As I entered the laboratory, I immediately smelled a strong, pungent odor that resembled the smell of solvent, based upon my personal sensory experience. I proceeded further into the laboratory, where I observed a small container labeled HAZARDOUS WASTE with a plastic "snap lid" funnel attached (Photo 13, Attachment 41, and Attachment 1). When I first observed the container, the plastic lid on top of the funnel was NOT snapped shut. I observed another closed container of HW stored inside a laboratory hood in the D141 laboratory (Photo 14, Attachment 41, and Attachment 1). I observed another small container on the floor of the D109 laboratory labeled HAZARDOUS WASTE. This container was similarly outfitted with a plastic "snap lid" funnel (Photo 15, Attachment 41, and Attachment 1). When I first observed this container, the plastic lid on top of the funnel was NOT snapped shut. I also observed closed labeled containers of HW stored inside a laboratory hood in the D109 laboratory (Photo 16, Attachment 41, and Attachment 1). Mr. Hospodarsky took immediate action and closed the funnel lids described above during the inspection. Based upon my observations, I informed Ms. James and Mr. Hospodarsky that I made the following preliminary finding of regulatory noncompliance:

NOPF#1: Treatment via evaporation of solvent waste in two containers that were not properly closed in accordance with the provisions of 40 CFR §270.19(c).

I proceeded outside and observed a storage shed used to store empty 55-gallon drums and waste containers staged for pick-up by Univar (Photo 18, Attachment 41, and Attachment 1). I did not observe any containers of HW stored inside the shed. I observed four empty 55-gallon drums and four full 55-gallon drums containing non-regulated waste awaiting pick-up (Photo 17, Attachment 41, and Attachment 1).

4.5 Documentation

Electronic manifests were reviewed prior to and during the CEI (Attachment 42). Uniform Hazardous Waste Manifests (UHWM) documenting shipments of HW off-site that were not included in the electronic manifest report were reviewed during the inspection and are attached (Attachments 43 and 44). No discrepancies were observed.

5.0 SUMMARY

NOPF #1 – 40 CFR §270.1(c): Treatment via evaporation of solvent waste (HW) in two containers that were not properly closed.

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

HURLEY BRYANT (Affiliate) Digitally signed by HURLEY BRYANT (Affiliate)
Date: 2021.10.26 21:26:40 -05'00'

Date: 10/26/2021

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

AMBER WHISNANT Digitally signed by AMBER WHISNANT
Date: 2021.10.27 12:14:42 -05'00'

Date: _____

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

Attachments

1) Facility Layout Diagram (1 page)
2) Confidentiality Notice (1 page)
3) Receipt of Document and Samples (2 pages)
4) Notice of Preliminary Findings (NOPF) (1 page)
5) Hazardous Waste Site Info Verification Report for Inspector (2 pages)
6) Solvent Mixture Profile, ChemCare® (7 pages)
7) Safety Data Sheet (SDS), Methanol (12 pages)
8) SDS, Acetone (8 pages)
9) SDS, Heptane (11 pages)
10) SDS, Hexanes GR ACS (12 pages)
11) Material Safety Data Sheet (MSDS), Ethanol SDA1, Anhydrous (11 pages)
12) SDS, Acetonitrile (9 pages)
13) MSDS, Dichloromethane (8 pages)
14) SDS, Toluene (8 pages)
15) MSDS, Methylimidazole (4 pages)
16) SDS, Pyridine (9 pages)
17) SDS, Ethyl Acetate (10 pages)
18) SDS, Acetic Acid (9 pages)
19) Water Trace Solvents Profile, ChemCare® (7 pages)
20) SDS, Triethylamine (10 pages)
21) SDS, Hexafluoroisopropanol (7 pages)
22) SDS, Ammonium Chloride (8 pages)
23) SDS, Ethylenediaminetetraacetic Acid (9 pages)
24) SDS, Sodium Chloride (6 pages)
25) MSDS, TRIS Hydrochloride (6 pages)
26) RNA Extraction By-Product & Debris Profile, ChemCare® (7 pages)
27) SDS, Isopropanol (8 pages)
28) SDS, Reagent Cartridge, Virus Mini (14 pages)
29) 2X Hybridization Buffer Profile, ChemCare® (7 pages)

30) SDS, xGen® 2X Hybridization Buffer (9 pages)
31) SDS, Tetramethylammonium Chloride (8 pages)
32) Lab Cleanup Profile, ChemCare® (7 pages)
33) MSDS, Acrylamide (7 pages)
34) Email from Doug Bryant sent to IDT at 9:30 AM, 10/5/2020 and response from Emily James received at 2:21PM, 10/7/2021, Subject: Waste Stream Profile-Lab Cleanup (1 page)
35) Silica Powder Profile, ChemCare® (7 pages)
36) Rags with Absorbed Solvents Profile, ChemCare® (7 pages)
37) SDS, Molecular Sieves (7 pages)
38) Glass Bottles Profile, ChemCare® (7 pages)
39) Fluorescent Lamps Profile, ChemCare® (7 pages)
40) Photo Log (2 pages)
41) Visual Inspection Photos (18 pages)
42) Manifest Inspectors Report, dated August 30, 2021 (5 pages)
43) Uniform Hazardous Waste Manifest (UHWM) #023221002 JJK, dated 8/16/21 (2 pages)
44) UHWM #023221088 JJK, dated 9/1/21 (2 pages)
45) Checklist (9 pages)

Notice of Preliminary Findings

(For Contractor Use Only)

Facility Name: Integrated DNA Technologies

Facility Address: 2501 Crosspark Road
Coralville, IA 52241

EPA ID#: IAR000525147 **Date:** 9/14/2021

Notice: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for the EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to the EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and will make determinations as to what violations may have occurred at your facility.

Citation	**Description of Finding**
40 CFR 270.1 (c)	Treatment via evaporation of solvent waste in containers that were not properly closed

If you have any questions about this Notice or wish to discuss your response, you may call me at (913) 551-7120, or Kevin Snowden (Compliance Officer) at (913) 551-7022

This Notice prepared by J.D. "Doug" Bryant, CPP, PCT Date: 9/14/2021

The undersigned person hereby acknowledges receipt of this Notice and has read the same.

Printed Name: Emily James Date: 09.14.2021

Signature: Emily James

Title: Environmental Health + Safety Manager

(Rev: 2/25/2020) White Original/ EPA • Yellow/ Facility