

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

PAINT-LINE INC.
607 W. Grimes St
Fairfield, Iowa 52556
641-469-3432 Installation Phone Number
641-469-3432 Site Contact Phone Number

EPA ID Number: IAR000003541

On

February 9, 2022

By

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Enforcement and Compliance Assurance Division

1.0 INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division (ECAD), I performed a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Paint-Line Inc. in Fairfield, Iowa. The inspection was conducted on February 9, 2022. The CEI was conducted under the authority of RCRA Section 3007(a), as amended. During the inspection, I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. This report and attachments present the results of the CEI. Based on the information obtained during the inspection, I inspected Paint-Line Inc. as a very small quantity generator (VSQG) of known hazardous waste (HW), and a small quantity handler of universal waste (SQHUW) lamps. According to the U.S. Environmental Protection Agency (EPA) RCRAInfo database, the facility had been previously inspected by the EPA on December 1, 1999.

2.0 PARTICIPANTS

Paint-Line Inc.:

Frank Nelson, General Manager (2 years in current position / 27 years total)
Amy Wolcott, Office Manager (2 years in current position / 7 years total)

EPA:

Mark Holcomb, Civil Investigator (NOWCC/SEE) (Lead Inspector)
H.D. "Doug" Bryant, Civil Investigator (NOWCC/SEE) (Training Preceptor)

3.0 INSPECTION PROCEDURES

On February 9, 2022, Doug Bryant and I arrived unannounced at the facility's main entrance at about 0900 hours. Initially I conducted a visual reconnaissance of the building/facility searching for areas of concern observable from the adjacent public roadway and parking lot. Much of the facility grounds backed up next to neighboring businesses and were not readily observable. I identified no environmental issues or concerns during this preliminary examination. At an office inside near the front door, we met Frank Nelson (General Manager). I introduced myself and I asked for John Brokken, who is listed on our Notification Verification Report as the site contact (last updated in 1999). I was informed by Mr. Nelson that Mr. Brokken had retired several years earlier and that he was the new General Manager, and he could help us. Mr. Nelson stated that he had been with Paint-Line Inc. for over 27 years, including two years in his current role as the general manager. Mr. Nelson told us there were currently no specific COVID-19 staff or visitor requirements and the only safety personal protective equipment (PPE) requirements at this facility were safety shoes and protective glasses. He offered us to use an empty upstairs office as our meeting and staging point for the day. Mr. Nelson introduced us to Amy Wolcott as the Office Manager. Ms. Wolcott has been with the company for seven years and two years in the current role. Ms. Wolcott did not attend the opening, exit, or visual part of our inspection, but she did help locate and copy most of the requested documents.

At the opening conference, I again introduced myself and presented my EPA ID. I also introduced my colleague Mr. Doug Bryant. I explained that I was the lead investigator, but I was also in training and that Mr. Bryant was my trainer and our credentialed inspector. Mr. Bryant presented his credentials. I explained the purpose and procedures of the inspection. I presented Mr. Nelson 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. I made him aware of their confidentiality rights and informed him that a Confidentiality Notice would be provided at the end of the inspection to make a confidentiality claim if they so desired.

The RCRA inspection consisted of a discussion of facility operations, waste generation, and waste management; a visual inspection of active waste generation and management areas; and a review of waste management records. During the visual inspection, Mr. Nelson was present throughout the inspection. Mr. Nelson was also present for the opening and exit conferences.

I conducted a visual inspection of the following:

- Universal waste storage (spent lamps) area in the Little Maintenance Room
- Warehouse Room
- Paint Storage Room / Hazardous Waste Central Containment Area (CAA)
- Down Draft Powder Painting Booth
- Dip Line with Cross Draft
- Central Main Office Area
- Loading Dock (Trash & Recycling Dumpsters)

Document Photocopies and Photographs were collected as inspection documentation (see Attachments #1-16 and Photos 1-17). The photo log is included in Attachment #3. Information

collected during the inspection is documented on an Entry/Exit checklist and hazardous waste compliance checklists and notebook. I reviewed documents including the following: Safety Data Sheets (SDS); bill of lading; waste profiles; and manifests.

On February 9, 2022, at the conclusion of the inspection, I held a closing conference. Participants included Mr. Nelson, and Doug Bryant. I provided Mr. Nelson with a Receipt for Documents (see Attachment #4) and a Confidentiality Notice (CBI) (see Attachment #5) which he signed as acknowledgement of receipt. No confidential business information (CBI) claims were made. I summarized my findings and recommendations and provided Mr. Nelson with a Notice of Preliminary Findings (NOPF), which he signed to acknowledge receipt (see Attachment #6). I provided inspection and compliance assistance documents during the inspection, some as paper versions and some in electronic PDF via email, that included the following:

- *RCRA Section 3007(a)*
- *Title 18 U.S. Code, Sections 1001 and 1002*
- *Confidentiality Notice (Top page of the completed carbonless transfer set)*
- *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA In Connection with Inspections Receipt for Documents and Samples*
- *Notice of Preliminary Findings (NOPF) with Instructions for Responding on back of form (top page of the completed carbonless transfer set)*
- *Instructions for Responding to a Notice of Preliminary Finding (NOPF) (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)*
- *Commercial Motor Vehicle Transportation System Security & Safety*
- *Security Awareness (EPA Handout)*
- *Chemical Facility Anti-Terrorism Standards (Homeland Security Handout)*
- *Iowa Life/Changing Iowa Department of Economic Development – Iowa Environmental Guide for Business*

On March 17, 2022, I had a brief phone conversion with Mr. Nelson to clarify a few questions I had. I also asked him to send me a copy of their most recent City wastewater sampling results. I

followed the inspection procedures detailed in the RCRA CEI Standard Operating Procedure (SOP) 2321.1, unless noted otherwise.

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

Mr. Nelson stated that this Paint-Line Inc. facility at this location began operations in 1995. Paint-Line Inc. specializes in industrial powder coating and high-temperature protective coating of fabricated metal (mostly iron and steel) components for other companies. Paint-Line Inc. conducts mostly powder coat painting in a large industrial paint booth and periodically a wet paint dip in a paint dip tank or paint booth. Paint-Line Inc. is part of the Schaus-Vorhies Companies (SVC), which is a group of companies that provides services in the commercial construction and fabrication business sector in southeastern Iowa. Paint-Line Inc. has nine employees working mostly Monday–Thursday day schedules. Paint-Line Inc. has an approximately 60,000 square foot building attached to another SVC sister business. Mr. Nelson stated that a third of their building is rented from SVC and the other two thirds is owned by Paint-Line. See Attachment #1 for the facility aerial view and map location. See Attachment #2 and Photo 17 for a facility diagram and see Photo 16 for an outside view of the facility from the East parking lot. See Photo 13 for an inside view of the main office area. Raw materials used includes powder coating, and occasionally red primer and black enamel paints, and paint thinner solvent.

4.2 Facility RCRA Status

RCRAInfo lists a previous RCRA compliance inspection for Paint-Line Inc., conducted on December 22, 1999. The report only listed one NOPF for failure to make a hazardous waste determination for the spent paint booth filters prior to disposing in the general trash. A follow-up analytical report dated March 24, 2000, from the Hygienic Laboratory at the University of Iowa, indicated the spent paint booth air filters to be non-hazardous with a leachate pH of 5.0 and the Toxic Characteristic Leaching Procedure (TCLP) constituents all well below regulatory levels. A copy of this report is in the EPA file. At the time of this current inspection, the wet-paint booth had not been used much in the last several years. The 1999 inspection report also mentioned waste streams no longer being generated/accumulated such as used oil from forklifts (forklift oil changes are now outsourced, and the used oil is not collected onsite), and still bottoms. Mr. Nelson stated that they did previously have a still for condensing waste paint thinner/solvent, but it was lost during a paint booth fire in 2015 and since their use of wet paint in the last several years had decreased significantly, it was not replaced.

According to the RCRAInfo Notification Acknowledgement/Verification Report, Paint-Line Inc. last notified as a Very Small Quantity Generator (VSQG) on November 30, 1999. I provided Mr. Nelson with the Notification Acknowledgement/Verification form, which he reviewed and returned with changes for the site contact (see Attachment #7). The RCRAInfo eManifest report indicates they generated D001, D035, and F003 waste codes. The eManifest also shows a large shipment of 14 drums, or 4200 lbs, of “UN1263 Waste Paint Related Materials” on May 13, 2020. Mr. Nelson explained that they had a fire in 2015 that burned

down their Paint Room. Over the next several years they were cleaning up the damaged area and subsequently shipped out all the collected waste from the damaged Paint Room in May 2020. Additionally, during this time frame their production processes changed from some use of “Wet Paint” on the dip line cross draft to mostly using the “Powder Paint Booth” with the down draft. Mr. Nelson stated that they have not had any significant wet spray paint jobs “in years”.

At the time of the inspection, based on the facility's hazardous waste generation rate (less than 220 pounds, or 100 kg, of non-acute hazardous waste generated per month), I determined Paint-Line Inc. to be an VSQG of hazardous waste generator. In addition, I determined Paint-Line Inc. to be a small quantity handler of universal waste-lamps. After further review, when Paint-Line Inc. shipped the 14 drums of waste back on May 13, 2020, it appeared that they may have been over the LQG limit and it is unclear if they should have been subject to LQG requirements at the time. This could possibly require EPA follow-up.

4.3 Facility Waste Streams and Management

The following waste streams are managed by Paint-Line Inc.:

Waste Paint and Paint Related Materials – As noted above, Paint-Line Inc. has been transitioning away from wet painting and more to using the powder coating process. Mr. Nelson estimates that they are currently using only wet paint for about one percent of their jobs vs 99 percent powder coat. See Photo 12 for an example of the wet paint dip line that was shut down during the time of the inspection. Their last shipment of Waste Paint and Related Materials was on May 13, 2020, and Mr. Nelson stated that a majority of that shipment's 14 drums, and 4200 lbs, was mostly cleanup from their Paint Room fire in 2015. See Attachment #8 for the Invoice from Heritage-Crystal Clean for this shipment and see EPA eManifest for the electronic manifest. I estimated Paint-Line Inc. current generation rate for this waste paint stream based on the volumes noted on-site during the visual inspection of the two 55-gallon drums, one paint and one thinner, each 1/3 full, in the CAA Paint Room. Using the average density of the three SDS's for paint and thinner (Attachments #10, #11, and #12), which equals 9.1 lbs/gal, and then estimating a full 55-gal drum of paint or thinner at about 500 lbs. Then the two partially full drums at $500 \text{ lbs} \times 2/3 = 333 \text{ lbs}$. Assuming 21 months since May 2020. Mr. Nelson stated that the remaining amount of 333 lbs generated over the last 21 months would be a good, estimated generation rate. He stated on a monthly basis the generation rate would range from a low of zero per month, but he was not sure what the high end of the range would be but probably not too much above the 16 lbs per month average during this period. As noted earlier, this varies significantly based on if they have any jobs that require wet paint during the month. Paint-Line Inc. classified this waste as UN1263, Waste Paint Related Material, managed as D001 and D035 characteristic and F003 and F005 listed hazardous waste based on process and product knowledge. See Attachments #10, #11, and #12 for SDS's on the different paints and thinner used. The on-site waste paint stream is managed by placing it in two 55-gallon steel drums located in the Paint Room. Once full the drums remain in the Paint Room CAA. Mr. Nelson stated that they typically wait until they have three full drums for a full skid pallet and then call Heritage-Crystal Clean for pickup. During my visual inspection I observed two 55-gallon steel drums in the Paint Room CAA, both appeared to be in good

condition with no leaks and placed on wooden pallets (see Photos 6-9). The black 55-gallon paint steel drum was labeled with both Hazardous Waste and Flammable and was about 1/3 full. The top lid band did not appear to be secured. The other 55-gallon paint thinner steel drum was also about 1/3 full. It was labeled “waste paint thinner” and dated “5/11/2020”. There was no visible Hazardous Waste label, and the nature of hazard “flammable” label appears to be present but is worn off and illegible. The bung cap is open. Note: labeling and secure top is not required for a VSQG. According to the eManifest, the previous waste paint shipment was sent to “Petro Chem Processing Group of Nortru LLC” in Detroit, Michigan, for H061 (Fuel blending prior to energy recovery) and H141 (Storage and Transfer) management.

Process Parts Cleaning Wastewater Stream – The Paint-Line Inc. generates a variable amount of waste cleaning water used to clean parts prior to powder coating or painting. Mr. Nelson stated this varies significantly. Some parts can just be wiped off prior to processing, but some require spray washing with an alkaline phosphate solution and/or acidic solution, followed by drying. Both solutions are significantly diluted with water prior to use. Mr. Nelson was not sure what the typical solution water to product ratio mixture was, but he stated it was only a small part phosphate or acid cleaner and a larger part water. He added that the parts are then rinsed with significant amounts of additional water. Most of the wash solution is reused and the amount that becomes waste is minimal and very diluted and is washed down the drain. Mr. Nelson estimated that a typical waste amount may be about 100-150 gallons per job, of which most is water. The two products they use for parts washing prior to processing includes Americo Phos Clean 200FL (mostly Phosphoric Acid) and Spray CleanNE 2103 (mostly Potassium Hydroxide). See Attachments #13 and #14 for their SDS’s. The SDS’s indicates the non-diluted solutions have an “as is” pH of 1.90 and 13.99 respectively. The Phos Clean product is transported in blue 55-gal poly drums. During my visual inspection I did not observe any wash/rinsing operations. I did observe several empty blue poly containers stacked in the warehouse for return shipment (see Photos 4 & 5). Paint-Line Inc. waste determination is that the diluted wash/rinse run-off is non-hazardous. This is based on analytical testing by the City of Fairfield Wastewater testing. Mr. Nelson stated that the city tests the washing/rinse wastestream quarterly and the results are “always well within the required limits”, and they subsequently have approval from the City of Fairfield to use the Publicly Owned Treatment Works (POTW) for this waste discharge. At the time of the previous EPA inspection in 1999, a copy of the City’s test results was placed in the EPA file. I also requested a more recent copy from Mr. Nelson after the inspection. Note: a few days after my inspection, on February 15, 2022, the City of Fairfield Wastewater Department came by for their quarterly sampling of the wastewater. Mr. Nelson emailed these to me, and I have attached the analytical report from Eurofins Analytical Testing America out of Cedar Falls, Iowa as Attachment #15 and a one-page Fairfield Wastewater Treatment Plant Lab Results as Attachment #16.

Waste Powder Coating – The powder coating paint used in the powder coating process is very fine and appears to be similar in consistency to baking flour. Mr. Nelson stated that the powder coating is marketed as eco-friendly compared to wet paint. The powder coat is typically more durable and safer to use than wet paint. He stated that they have transitioned to greater than 99 percent powder coating vs. less than one percent wet painting jobs in the last few years. Paint-Line’s waste determination is that it is non-hazardous based on process and product knowledge. I

did not ask for a SDS for the powder coat paint. Mr. Nelson estimated that they generate less than ¼ gallon per day of waste powder coating. See Photo 10 and 11 to visualize the powder paint line and industrial oven used along with the down draft air filters. The on-site management includes sweeping up the powder paint, often with the floor sweep product mentioned below, and placed in the general trash. General trash is processed weekly by Waste Management.

Air Filters (Powder Coat Booth) – The powder coat booth air filters (see Photo 11) are changed out every six months. They are sent to a company in Quincy, IL, called Clean Air Filters where they are cleaned, retested to make sure they still meet specs, and are then returned for reuse. See Attachment #9 for a Bill of Landing from Clean Air Filters and a summary of their testing report from December 2021. Paint-Line's Inc. waste determination on these filters is that they are non-hazardous. This determination is based on that the filters only contain powder coat debris from the powder coating process, and they had already determined the powder coat powder to be non-hazardous based on process and product knowledge. It should be noted that during their 1999 EPA inspection they received an NOPF and request to make a waste determination on the powder air filter by testing it. Paint-Line responded with *"Since the canisters are cleaned and reused, we do not consider them waste and to test one would require destroying a functional filtration unit..."*

Air Filters (Wet Paint Booth) – Mr. Nelson stated that the spent paint booth air filters used in the wet paint booth are replaced yearly. The filters are six feet tall by 25 feet long. Mr. Nelson stated that a significant difference since their last inspection in 1999 is that the wet paint booth is used much less often now. He estimated they may have only one to two wet paint jobs per year. He also stated that they frequently use these filters to recirculate factory air, so the majority of the contaminants in the filters are probably dirt and dust. Paint-Line Inc. waste determination of these air filters is that they are non-hazardous. This is based on analytical testing of the air filters after the previous inspection back in March 2000. As mentioned above, a follow-up analytical report, dated 3/24/2000 from the Hygienic Laboratory at the University of Iowa, indicated the spent air filters to be non-hazardous with a leachate pH of 5.0 and Toxic Characteristic Leaching Procedure (TCLP) all well below regulatory levels. A copy of this report is in the EPA file. On-site processing of this waste stream is placing the filters in the general trash, that is then collected by Trash Management.

Empty Aerosol Paint Cans – Mr. Nelson stated that aerosol paint cans are used very infrequently. Typical use is to spray over the small notch on the painted/coated item that is blocked by the hook used to hang object during the coating or painting process. Paint-Line Inc. estimates their generation rate of empty aerosol cans to be only one 16-oz can per month. The cans are not punctured. Mr. Nelson stated that they determined this waste stream to be non-hazardous since the cans are empty and treat it as general waste and dispose of in the trash. During the visual inspection I did not observe any waste aerosol cans.

Spent Universal Waste Lamps – Paint-Line Inc. generates a small number of spent Universal Waste lamps during their switch over to LED lamps, which they recently completed. During the visual inspection, I observed several spent florescent lamps stored in the Little Maintenance Room. I observed a total of two cardboard boxes of spent lamps – both boxes were open, no labels, and no accumulation start dates. There appeared to be four eight-foot lamps inside one

box with two loose lamps outside of the box. The top of the box was open. The other box had two four-foot lamps inside this open, and unlabeled box (see Photos 1, 2, and 3). Mr. Nelson stated that their normal process is to take the spent lamps next door to their sister company, SVM, where they are then sent out for recycling. Mr. Nelson stated that he was not aware of any universal waste-lamp training for staff and did not have any method of dating or logging dates for tracking accumulation time, but he was sure that they lamps had only been in storage for about two months.

- **Demonstrate the length of time universal waste lamps has been accumulating as required in 40 CFR 273.15(c), NOPE 2**
- **Train employees responsible for managing of universal waste lamps in proper handling as required in 40 CFR 273.16, NOPE 3**
- **Keep universal waste lamps in a closed and structurally sound container as required in 40 CFR 273.13(d)(1), NOPE 4**
- **Label individual waste lamps as “universal waste-lamps”, or “waste lamps”, or “used lamps” as required in 40 CFR 273.14(e), NOPE 5**

Floor Sweep Absorbant – The floor sweep product is saw dust with wax used to sweep the floors and keep the dust down. Mr Nelson stated that Paint-Line generates about 30-gallons every two to three months. Their hazardous waste determination is that it is non-hazardous based on product and process knowledge. On-site management is it goes into the trash cans. When full it is transferred to the general trash dumpsters outside.

Shop Disposable Cloth Rags – Mr. Nelson stated that they use disposable cloth (former repurposed t-shirts) to wipe off the spray paint gun with xylene and occasionally wipe off parts. As mentioned above, wet spray paint jobs are very rare, and they may go for months without a wet paint job and zero use of the rags. For a month that they may have a wet paint job request, they could use up to 10 rags that month. Mr. Nelson stated that they use the small “cup” style paint guns and use solvent to wipe down/clean the gun after use. They make sure the rags are only lightly soiled with solvent and paint. They make sure the rags are not soaked and contain no free liquid. Mr. Nelson stated that the rags, when generated, are collected daily and disposed of in the general trash. Their waste determination is that they are non-hazardous based on process and product knowledge. At the time of the inspection, I did not see any rags in use or discarded, and I did not ask any more questions about rags.

General Trash – General trash is generated by routine operations. Mr. Nelson estimates they generate about one six-cubic-yard dumpster per week (see Photo 15). Their waste determination is that this is non-hazardous. Their general trash is collected weekly by Waste Management and transported to the local landfill.

Recyclable Paper/Cardboard – General recycling paper and cardboard is generated by routine operations. Product shipped to them for coating is often containerized in cardboard. Mr. Nelson estimates they generate about one six-cubic-yards dumpster per week (see Photo 15). Their waste

determination is that this is non-hazardous. Their general recyclable dumpster is collected weekly by Waste Management and transported to their facility for recycling.

Wooden Pallets – Most of the product sent to Paint-Line for coating, is transported on wooden pallets. They accumulate the wooden pallets in their storage area and outside near the loading dock (see Photo 14). Once they collect about four to five stacks of pallets, they ship them back to the foundry “just down the street” for reuse.

4.4 Other Regulatory Requirements

Outside Facility Perimeter - I did a limited inspection of the outside perimeter of the facility and observed no hazardous waste storage tanks, containers, or other stored waste. The Paint-Line building is attached to a sister business on the west side of the facility and there are numerous tanks on the north side that Mr. Nelson told me were owned by other businesses. There was a dirt parking area on the east side. I did not observe any security fencing. See the aerial photo in Attachment #1.

Central Accumulation Area (CAA) – The Paint Room functions as the CAA and is located on the south side of the facility. See Attachment #2 for a facility diagram. The Paint Room was equipped with an overhead automated fire suppression system (see Photo 9) and explosion proof lights. I did not ask about weekly inspections since this is not required for VSQG. See Photos: 6, 7, 8, and 9. I reviewed the management of the CAA and no other findings were noted.

Preparedness and Prevention – Paint-Line has numerous fire extinguishers throughout the facility including an automated overhead fire suppression system in the Paint Room (CAA). I did not ask additional questions about a contingency plan, or weekly CAA inspections since this is not required for a VSQG.

Personnel Training – I did not ask specifically about staff hazardous waste training and training documentation since this is not required for a VSQG.

5.0 SUMMARY OF FINDINGS

NOPF 1: *Do not accumulate universal waste lamps for longer than one year as required in 40 CFR 273.15(a) – **Rescinded** post inspection after clarification*

NOPF 2: **Demonstrate the length of time universal waste lamps has been accumulating as required in 40 CFR 273.15(c)**

NOPF 3: **Train employees responsible for managing of universal waste lamps in proper handling as required in 40 CFR 273.16**

NOPF 4: **Keep universal waste lamps in a closed and structurally sound container as required in 40 CFR 273.13(d)(1)**

NOPF 5: Label individual waste lamps as “universal waste-lamps”, or “waste lamps”, or “used lamps” as required in 40 CFR 273.14(e)

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.

MARK HOLCOMB
(Affiliate)

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Date: 2022.03.28 13:29:26
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Mark Holcomb
Civil Investigator
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Amber Whisnant
RCRA Section Chief, ECAD/CB

Attachments:

1. Facility Aerial Photo (1 page)
2. Facility Diagram (1 page)
3. Photo log (9 pages/17 photos)
4. Receipt for Documents (1 page)
5. Confidentiality Notice CBI (1 page)
6. Notice of Preliminary Findings NOPF (1 page)
7. EPA RCRA Notification Acknowledgement/Verification Report (1 page)
8. Invoice Paint Shipment 5.13.2020 (1 page)
9. Bill of Lading- Air Filter Test Results (1 page)
10. SDS- Americoat Primer Red (16 pages)
11. SDS- Black Dip Enamel (13 page)
12. SDS- Xylene (12 pages)
13. SDS- Spray Clean NE 2103 (10 pages)
14. SDS- Americo Phos Clean (7 pages)
15. Wastewater TestAmerica Analytical 2.15.22 (8 pages)
16. City of Fairfield Wastewater Sample Report 2.15.22 (1 page)