

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

Emerald Transformer PPM, LLC
2474 North Highway 169
Coffeyville, Kansas 67337
620-251-6380

EPA Identification Number: KSD981506025

On

July 28, 29, and 30, 2021

By

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 7
Enforcement & Compliance Assurance Division

1.0 INTRODUCTION

I performed a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) remote virtual and a visual inspection at Emerald Transformer PPM, LLC (Emerald Transformer), located in Coffeyville, Kansas, on July 28, 29, and 30, 2021. I conducted the inspection under the authority of RCRA Section 3007(a), as amended. During the inspection, I collected the information necessary to determine compliance with the applicable regulatory and statutory requirements. This report and attachments present the results of the inspection. Based on the information obtained during the inspection, I inspected the facility as a permitted treatment, storage, disposal (TSD) facility, Kansas Small Quantity Generator (KSQG) of hazardous waste, generator of universal waste lamps, and used oil generator. Emerald Transformer was last inspected by the Kansas Department of Health and Environment (KDHE) on August 28 and 29, 2018. Five violations were observed or cited as a result of the 2018 inspection. The last EPA inspection was conducted on March 3, 2014. Two violations were observed or cited as a result of the 2014 inspection.

2.0 PARTICIPANTS

Emerald Transformer:

Bonnie Martin, Regional Environmental Manager (Employed by Emerald Transformer Since July 2017)

Sheila Dickson, General Manager (Number of Years Employed by Emerald Transformer Not Documented)

Heather Hill, Chemist (Employed by Emerald Transformer 16 years)

Cindy DeTar, Laboratory Manager (Employed by Emerald Transformer 28 years)
Donnie Foster, Facility Technician (Number of Years Employed by Emerald Transformer
Not Documented)

U.S. Environmental Protection Agency (EPA):
Timothy Evans, Life Scientist, ECAD

3.0 INSPECTION PROCEDURES

On July 28, 2021, at approximately 1:30 p.m., I used Microsoft (MS) Teams to call Emerald Transformer and left a message for Ms. Dickson. At approximately 2:00 p.m., I then used MS Teams again to call and ask to speak with Ms. Martin. I was forwarded to Ms. Martin's phone, introduced myself and explained the purpose of my call. I informed Ms. Martin that I intended to conduct a RCRA inspection at Emerald Transformer on Thursday, July 29, 2021. Ms. Martin and I established a date and time for an on-site inspection starting at 10:00 a.m. on July 29, 2021. Ms. Martin informed me that she was located in Shawnee, Kansas and would not be participating in the on-site inspection. However, Ms. Martin stated that Ms. Dickson would be available at the facility for the inspection. I asked Ms. Martin if she had time to discuss inspection documents that I routinely provide at the time of an inspection opening conference. Ms. Martin stated that she had time to discuss the documents, which I provided to her through e-mail. The following opening conference documents were discussed: pre-inspection COVID-19 related questions, a site info verification report, a waste stream table, 2019 Biennial Report, and a copy of the RCRA Facility Access Information Sheet (March 2013), which describes the EPA's inspection authority. I also explained my need to collect accurate information and provided Ms. Martin with a copy of Title 18 U.S. Code, Sections 1001 and 1002. Ms. Martin stated that she would forward the inspection documents to Ms. Dickson and inform her of my intent to conduct a RCRA inspection.

On July 29, 2021, I arrived at Emerald Transformer at 10:10 a.m. A drive-by inspection was only possible on the west perimeter of the facility. No apparent issues were observed. I then proceeded into the facility and used a facility phone to call Ms. Dickson. Ms. Dickson met me at the visitors area of the facility and viewed my EPA credentials through a window, prior to allowing me into the facility. Ms. Dickson and I used a conference room near the facility offices for the in-briefing. I presented Ms. Dickson with my business card. Ms. Dickson provided me with a company COVID-related questionnaire, which I completed and returned to her. As part of the in-briefing, Ms. Dickson was made aware of Emerald Transformer's confidentiality rights and informed that a Confidentiality Notice would be provided at the end of the inspection to make, or not to make, any claims. Ms. Dickson acted as the facility representative during the on-site inspection activities.

During the inspection, discussions consisted of wastes generated and waste management practices.

I conducted a visual inspection of the laboratory, maintenance, main processing building, Building A, less than 90-day hazardous waste accumulation area, QA/QC (sellable metal and equipment storage), product tank farm, transformer decommissioning area, rail room, detox removal, sodium room/grinding room, transformer processing donning and doffing area (universal waste battery accumulation container), dirty maintenance (universal waste lamp accumulation area), and a vapor degreaser tank utilizing n-propylbromide.

Information collected during the inspection was documented in a bound notebook, on the KDHE Hazardous Waste Generator Requirements checklist (Attachment 1), and as discussed below.

At the conclusion of the inspection, I summarized the findings and recommendations with Ms. Dickson on July 29, 2021. I provided Ms. Dickson with a Confidentiality Notice (Attachment 2) which she signed as acknowledgement of receipt. Ms. Dickson made no confidentiality claims.

I also provided Ms. Dickson with a Receipt for Documents and Samples (Attachment 3) and Notice of Preliminary Findings (NOPF) (Attachment 4), which Ms. Dickson signed as acknowledgement of receipt. Using MS Teams, I summarized the findings and recommendations with Mses. Dickson and Martin on July 30, 2021.

The following inspection documents were provided to Emerald Transformer:

Inspection Documents

Confidentiality Notice

Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA In Connection with Inspections (provided electronically on August 27, 2021)

Receipt of Documents and Samples

Notice of Preliminary Findings

Instructions for Responding to a Notice of Preliminary Findings

KDHE Compliance Assistance Handouts (provided electronically on July 30, 2021)

Spent Fluorescent Lamps Containing Mercury (HW-1995-G1)

Requirements for Handlers of Universal Waste (HW-2001-G1)

Recycling and Disposal of Aerosol Cans (HW-2002-G2)

Container Management for Hazardous Waste Generators (HW-2005-G1)

I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.1D), unless noted differently. Any federal regulatory citations noted in this report are as adopted by reference in the authorized Kansas regulations.

4.0 FINDINGS AND OBSERVATIONS

4.1 General Information/Facility Description/TSD Permit/RCRA Status

Emerald Transformer operates five Polychlorinated Biphenyls (PCB) Commercial Storage Facilities in DeFuniak Springs, Florida; Twinsburg, Ohio; Tucker, Georgia; Los Angeles, California; and Coffeyville, Kansas. Facility operations consist of decommissioning transformers, which generates waste oil and scrap metal, treating waste oil to create on-specification dielectric oil, and refurbishing transformers. The facility primarily receives transformer oil from municipalities and electric cooperatives. Emerald Transformer provides a mobile service (an approximately 350 mile radius from the facility) to pump oil out of transformers. According to Ms. Dickson, approximately 60 percent of transformer oil processed at the facility contains 0-49 ppm PCBs. Emerald Transformer is staffed by 26 full-time employees and operates Monday - Thursday 6 am to 4:30 pm; Friday 6:00 am to 2:30 pm. The Emerald Transformer facility is located on 66 acres with 406 total acres of property. A facility diagram is included as Attachment 5.

TSD Permit

The Coffeyville facility was previously owned by Clean Harbors and was utilized as a TSD facility for hazardous waste. Although the Coffeyville facility does not currently accept any off-site generator hazardous waste, Emerald Transformer maintains a TSD permit which includes a less than 90-Day hazardous waste accumulation area. The TSD permit is also maintained to address ongoing RCRA corrective action at the facility. The facility permit was renewed on May 16, 2021 by the KDHE. See Section 4.4.4 for information related to inspection of the permitted less than 90-Day hazardous waste accumulation area.

RCRA Status

According to the RCRAInfo database, Emerald Transformer has notified as a State of Kansas and Federal Large Quantity Generator of hazardous waste and hazardous waste transfer facility, hazardous waste treater, and storer. However, based upon the type and amount of hazardous waste generated and accumulated at the time of the inspection, the facility's generator status appears to be a Kansas Small Quantity Generator. As part of the opening conference documents e-mailed to Emerald Transformer, I provided Ms. Martin with a Hazardous Waste Site Info Verification Report for Inspector form (Attachment 6). Ms. Martin and I reviewed the form during the virtual in briefing on July 28, 2021. Ms. Martin made no changes to the form. However, subsequent to the inspection, it was determined that additional waste codes would need to be added to the form. See Section 4.3.4 for additional information related to Emerald Transformer notification requirements. Based upon the amount and type of hazardous waste generated at Emerald Transformer, I inspected the facility as a permitted TSD facility, Kansas Small Quantity Generator, small quantity handler of universal waste, and used oil generator.

4.2 Changes Since Previous Inspection

Sheila Dickson replaced Rich Bevans, Jr. as Plant Manager in the first quarter of 2020.

The facility completed installation of the transformer painting operation, utilizing water-based paint, in the last quarter of 2018. See Section 4.3.3 for additional information related to the transformer refurbishing operation.

4.3 Waste Streams and Waste Management

Information related to waste streams is listed in the Waste Stream Table (Attachment 7).

4.4 Areas Visually Inspected and Related Violations/Issues

4.4.1 Laboratory

Hazardous Waste Container Not Managed as a Storage Container Within Three Days of No Longer Meeting the Definition of a Satellite Accumulation Container, 40 CFR

262.34(c)(2) (NOPF 1) – During inspection of the laboratory, I observed one 1-gallon hazardous waste satellite accumulation area (SAA) container located in Hood 6 (Photos 1 and 2). I asked Mses. DeTar and Hill where the hazardous waste within the SAA container is disposed when the container is full. Mses. DeTar and Hill stated that the container is emptied, at the end of each week, into a black metal 5-gallon SAA container located in Hood 7 (Photos 3 and 4). The SAA container in Hood 6 is located approximately 34 feet away from Hood 7. The SAA container located in Hood 6 contained approximately 20-30 mL of a D001 and F003 hazardous waste solvent and oil mixture; the SAA container located in Hood 7 contained approximately three gallons of a D001 and F003 hazardous waste solvent and oil mixture.

I also observed one 2-gallon plastic SAA container within a 5-gallon step can located in the PCB prep area (Photos 5 and 6). I asked Mses. DeTar and Hill where the hazardous waste within the SAA container is disposed when the container is full. Mses. DeTar and Hill stated that the container is emptied into a black polyethylene 55-gallon SAA container located in the lab flammable cabinet room (Photos 7 and 8). The 55-gallon SAA container in the lab flammable cabinet room is located approximately 15-20 feet away from the PCB prep area, in another room. The SAA container located in the PCB prep area was approximately ½-full of vials containing hexane from gas chromatography analytical equipment and the 55-gallon SAA drum in the lab flammable cabinet room was approximately ¾-full of 20 mL vials containing a D001 and D002 hazardous waste hexane and sulphuric acid mixture.

4.4.2 Sodium/Grinding Room

Hazardous Waste SAA Container Not Marked with the Words “Hazardous Waste”,

K.A.R. 28-31-262(c)(7) (NOPF 3) – During the inspection, we met Mr. Foster in the sodium/grinding room. I asked Mr. Foster and Ms. Dickson if any hazardous waste was generated in the sodium/grinding room. Mr. Foster showed me a closed 3.5-gallon white poly bucket containing approximately 15 sodium metal dust-contaminated plastic bags (Photos 9 and 10). According to Ms. Dickson, the sodium metal dust-contaminated plastic bags are managed and disposed as a D003 reactive hazardous waste. The container was not marked with the words “Hazardous Waste”.

During the MS Teams meeting with Mses. Dickson and Martin on July 30, 2021, I asked if laboratory analysis had been conducted to determine if the sodium metal dust-contaminated plastic bags were reactive hazardous waste. According to Ms. Martin, the sodium metal dust-contaminated plastic bags are managed as a D003 reactive hazardous waste as a best management practice. However, Ms. Martin indicated that Emerald Transformer may have the bags analyzed to determine if they meet the definition of a D003 reactive hazardous waste.

4.4.3 Building A – Transformer Refurbishing and Painting Area

Waste Determination Not Conducted for Transformer Paint Dust-Contaminated Sanding Discs, Sanding Booth Exhaust Filters, and Transformer Paint Dust-Contaminated Debris, e.g., Personal Protective Equipment and Paint Dust Floor Sweepings 40 CFR 262.11 (NOPF 4 Added After Inspection) – During the inspection, Ms. Dickson stated that Emerald Transformer refurbishes used transformers. According to Ms. Dickson part of the refurbishing process involves sanding old paint off transformers, prior to painting with a water-based paint. I asked Ms. Dickson if any of the transformers being refurbished at Emerald Transformer had been previously painted with paint containing any metals, in particular, RCRA regulated heavy metals such as lead or chromium. Ms. Dickson stated that she did not know what type of paint would be on transformers received and refurbished at Emerald Transformer.

According to Ms. Dickson, Emerald Transformer generates approximately eight pounds of sanding pads and transformer paint dust-contaminated debris every month and approximately 126 pounds of sanding booth exhaust filters every one and half years.

According to Ms. Dickson, paint dust-contaminated sanding discs, sanding booth exhaust filters, and transformer paint dust-contaminated debris is shipped by rail to, and disposed in, the Clean Harbors landfill located in Aragonite, Utah. Waste shipped to the Aragonite, Utah Clean Harbors facility has been determined to be non-hazardous, TSCA regulated waste. See “PCB-Contaminated Waste” on the waste stream table, Attachment 7.

An e-mail was sent to the facility on August 27, 2021, informing the facility of the additional citation (Attachment 8).

4.4.4 Permitted Less Than 90-Day Accumulation Area

During inspection of the permitted less than 90-day accumulation area, I observed two, 55-gallon blue polyethylene drums. The drums were full, closed, and labelled “Non-Regulated”. According to Ms. Dickson, the drums contained water-based paint waste from the transformer refurbishing area/painting area. I did not observe any hazardous waste in storage, including either facility or outside generator waste.

The secondary containment and epoxy coating appeared to be free of cracks and gaps in the permitted less than 90-day accumulation area.

4.4.5 Record Review

Weekly Inspections Not Conducted for Containers in Less Than 90-Day Storage (NOPF 2)

– According to, 40 CFR 265.174, the owner or operator must, at least weekly, look for signs of deterioration and leaks in containers in storage, and document the inspections. During review of records, I noted that documentation for weekly inspections was missing for April 3, 2019 through December 10, 2019. It should be noted that at the time of the inspection, Emerald Transformer was operating as a Kansas Small Quantity Generator. However, the facility had shipped greater than 24,000 pounds of PCB-contaminated sodium hydroxide hazardous waste in August of 2019 and the same, recontainerized waste again in February of 2020 (See “Records Requirements Related to Being a Large Quantity Generator in 2019 and 2020”, below. Although inspection documentation would not be required when Emerald Transformer was operating as a Kansas Small Quantity Generator, the facility would need to document inspections when generating and storing greater than 220 pounds of hazardous waste each month. I asked Ms. Dickson if inspections had been conducted for hazardous waste generated between April 3, 2019 through December 10, 2019. Ms. Dickson stated that she did not know if the inspections had been conducted. Subsequent to the inspection, during a phone conversation on July 30, 2021, Ms. Dickson stated that Emerald Transformer had located inspection documentation in the facility office.

Notification of Regulated Waste Activity Not Updated, K.A.R. 28-31-4 (NOPF 5 Added After Inspection) – Subsequent to the inspection, it was determined that the facility generates hazardous waste with associated waste codes D001, D003, and F003. These waste codes are reflected on the 2019 Biennial Report submitted to the State of Kansas and manifests reviewed prior to the inspection. However, waste codes D001, D003, and F003 do not appear on the facility Hazardous Waste Site Information Verification Report for Inspector (HWSIVRI) form (Attachment 6). During the in briefing, Ms. Martin stated that the waste codes appearing on the HWSIVRI form are waste codes associated with hazardous waste allowed to be received and stored at the facility in accordance with the current facility permit.

An e-mail was sent to the facility on August 27, 2021, informing the facility of the additional NOPFs (Attachment 8). A link to the KDHE Notification of Regulated Waste Activity form, 8700-12, was provided to the facility as part of the August 27, 2021 e-mail.

Manifests and Shipping Documents

Prior to arriving at the facility, I had conducted an on-line inspection of electronic manifests using RCRAInfo. I verified manifests were retained for at least three years. All manifests appeared to be complete, signed by the designated facility, and were accompanied by land disposal restriction (LDR) notification forms.

Although the facility is a permitted TSD, and is legally able to accept hazardous waste from other generators, I did not see any manifests showing off-site generated hazardous waste being accepted by Emerald Transformer.

No apparent issues were observed during review of manifests, bill of lading, and LDR notification forms.

Records Requirements Related to Being a Large Quantity Generator in 2019 and 2020

In 2019, approximately 24,000 pounds of sodium hydroxide (NaOH) solution, destined for Metalworking Lubricants Company (MLC) in Indianapolis, Indiana, was inadvertently added to a tanker trailer which previously contained PCB-contaminated oil. The NaOH solution was not able to be sent to MLC and was consequently managed as a D002 hazardous waste. Emerald Transformer shipped the PCB-contaminated NaOH solution to the Clean Harbors facility in Aragonite, Utah for disposal. However, the Utah Clean Harbors facility was not able to treat or dispose of the PCB-contaminated NaOH solution. The PCB-contaminated NaOH solution was then shipped back to Emerald Transformer, re-containerized into 55-gallon drums, and shipped to the Clean Harbors LaPorte, Texas facility for disposal in February 2020. Therefore, the facility was a Large Quantity Generator in part of 2019 and 2020.

2019 Comprehensive Biennial Report

Prior to arriving at the facility, I was able to review the facility 2019 biennial report using RCRAInfo.

No apparent issues were observed during review of the 2019 comprehensive biennial report.

Contingency Plan – Ms. Dickson provided me with a copy of the contingency plan. Emerald Transformer also maintains an electronic form of the contingency plan which included updated information for facility emergency coordinators.

The contingency plan appeared to be complete with no apparent issues.

Inspection Records

Over the last three years, Emerald Transformer was required to conduct monthly inspections as part of Kansas Small Quantity Generator requirements. Around August of 2019 and February of 2020, Emerald Transformer generated, and had in storage, greater than 2,200 pounds of D002 hazardous waste PCB-contaminated sodium hydroxide. During the inspection, facility personnel were not able to locate weekly inspection records for the PCB-contaminated sodium hydroxide. See NOPF 2 for additional information.

Personnel Training

During the inspection, Ms. Dickson provided me with training attendance sheets which listed names and signatures of Emerald Transformer employees. Training was conducted on February 28, 2019; February 21, 2020; May 27, 2020 (new employee, initial training); and February 19, 2021. Topics covered included RCRA, Spill Prevention, Control, and Countermeasure, use of the contingency plan, and the Stormwater Pollution Prevention Plan. Cindy DeTar, Laboratory Manager, acted as the instructor for all personnel training.

No apparent issues were observed during review of training records.

Emergency Equipment Testing and Inspection

During the inspection, I noted fire extinguishers throughout the facility had been inspected by Firex, Inc., Bartlesville, Oklahoma, in May of 2021.

During inspection of the detox removal area, I observed a “D” rated fire extinguisher for use with combustible metals.

No apparent issues were observed during review of emergency equipment testing and inspection records.

4.5 Additional RCRA Related Information

Sodium Hydroxide (NaOH) Solution

Emerald Transformer generates NaOH solution as a byproduct of treating PCB-contaminated dielectric oil removed from transformers. According to Ms. Dickson, the NaOH solution is used, as is, as a neutralizing agent by Metalworking Lubricants Company (MLC). In an e-mail dated August 12, 2021, I asked Ms. Dickson for additional information related to how MLC manages and utilizes NaOH solution at the their facility (Attachment 9). MLC provided information regarding hazardous secondary material recycling (Attachment 10). The additional information was requested from Emerald Transformer to ensure that the NaOH solution would be considered an excluded waste according to RCRA regulations. See the August 28, 2018 RCRA CEI for additional information related to MLC and their agreement with Emerald Transformer regarding use of NaOH solution (Attachment 11).

5.0 SUMMARY

I inspected Emerald Transformer as a permitted TSD facility, Kansas Small Quantity Generator of hazardous waste, small quantity handler of universal waste, and used oil generator.

Hazardous waste requirements reviewed during this inspection are discussed above and are noted on the KDHE Hazardous Waste Generator Requirements checklist included as Attachment 1.

The following preliminary findings/issues were noted as discussed above:

1. Hazardous Waste Container Not Managed as a Storage Container Within Three Days of No Longer Meeting the Definition of a Satellite Accumulation Container, 40 CFR 262.34(c)(2) (NOPF 1).
2. Weekly Inspections Not Conducted for Containers in Less Than 90-Day Storage (NOPF 2).
3. Hazardous Waste SAA Container Not Marked with the Words “Hazardous Waste”, K.A.R. 28-31-262(c)(7) (NOPF 3).
4. Waste Determination Not Conducted for Transformer Paint Dust-Contaminated Sanding Discs, Sanding Booth Exhaust Filters, and Transformer Paint Dust-Contaminated Debris e.g., Personal Protective Equipment and Paint Dust Floor Sweepings 40 CFR 262.11 (NOPF Added After Inspection).
5. Notification of Regulated Waste Activity Not Updated, K.A.R. 28-31-4 (NOPF Added After Inspection).

Other than the items noted above, no other apparent preliminary findings were observed or cited. However, EPA post-inspection review of this report may change or add to my findings.

Evans, Tim Digitally signed by Evans, Tim
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Timothy R. Evans
Life Scientist
ECAD/CB/RCRA, EPA Region 7

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

Attachments

1. KDHE Hazardous Waste Generator Requirements Checklist (15 pages)
2. Confidentiality Notice (1 page)
3. Document of Receipt (1 page)
4. NOPF (2 pages)
5. Partial Facility Diagram (1 page)
6. Hazardous Waste Site Info Verification Report for Inspector (2 pages)
7. Waste Stream Table (9 pages)
8. August 27, 2021 E-mail to Facility - Additional NOPFs (2 pages)
9. August 12, 2021 Email to Facility – Request for Additional Information Related to Use of Sodium Hydroxide by MWL (2 pages)
10. Information from MLC (2 pages)
11. August 28, 2018 RCRA CEI (89 pages)

Photo Log (2 pages)
Photos (5 pages/10 photos)

Notice of Preliminary FindingsMedia: RCRA

Facility Name: EMERALD TRANSFORMER PPM, LLC
Facility Address: 2474 N. HWY 169
COFFEYVILLE, KS 67337
EPA ID#: KSD 981506025 Date: 7.29.21

This notice is provided to call your attention to the following preliminary findings regarding state and federal regulations. This notice does not constitute a compliance order and may not be a complete listing of all findings resulting from the inspection.

Citation**Description of Finding**

<u>40 CFR 262.34(c)(2)</u>	<u>SAA CONTAINERS NOT MANAGED AS</u>
	<u>STORAGE CONTAINERS WITHIN THREE</u>
	<u>DAYS OF NO LONGER MEETING DEFINITION</u>
	<u>OF SAA CONTAINERS - LAB HW</u>
	<u>SOLVENT OIL MIX AND HEXANE AND</u>
	<u>SULPHURIC ACID SAA CONTAINERS</u>
<u>40 CFR 273.11(a)</u>	<u>UNLEAD ACID BATTERIES T.E. 7.29.21</u>
<u>40 CFR 273.16 T.E. 7.29.21</u>	
<u>40 CFR 265.174</u>	<u>WEEKLY INSPECTIONS FOR CONTAINERS</u>
	<u>IN LESS THAN 90 DAY STORAGE NOT CONDU</u>

As a continuation of the inspection performed at your facility, you are asked to submit a written response within 14 calendar days of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U.S. Environmental Protection Agency
Region 7, Enforcement & Compliance Assurance Division (ECAD)
11201 Renner Boulevard, Lenexa, KS 66219
ATTN: TIMOTHY R. EVANS

If you have any questions about this Notice or wish to discuss your response, you may call me at
(913) 551-7663, or EDWIN BUCKNER (Compliance Officer)
at (913) 551-7621

This Notice prepared by Timothy R. Evans Date: 7.29.21

The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: SHEILA DICKSON
Signature: Sheila Dickson
Title: GENERAL MANAGER
Date: 7-29-21

Notice of Preliminary Findings (Continued)

Media: RCRA

Facility Name: EMERALD TRANSFORMER PPM, LLC

Facility Address: 2474 N. HWY 169

COFFEYVILLE, KS 67337

EPA ID#: KSD981506025

Date: 7.29.21

Citation

Description of Finding

~~40 K.A.R.~~ T.E. 7.29.21

K.A.R. 28-31-262(C)(7)

SAA CONTAINER NOT MARKED
WITH WORDS "HAZARDOUS WASTE" -
3.5-GAL. BUCKET CONTAINING
SODIUM INGOT RESIDUE - CONTAM
INATED PLASTIC BAGS

Initials of Recipient: SDD

Date: 7-29-21

Initials of Preparer: TRE

Date: 7.29.21

Page 2 of 2