



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

FFR 15 2012

Mr. Bill Rider
2040 West River Drive
Davenport, Iowa 63122

Dear Mr. Rider:

On January 31, 2012, an inspection was conducted at Harcros Chemicals, Inc. at 2040 W. River Dr. in Davenport, IA. The authority to conduct an inspection is under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA). A copy of the memo regarding the inspection is enclosed.

Harcros Chemicals, Inc. was determined to be a non-generator of hazardous waste. During this inspection, I reviewed all applicable regulatory requirements under RCRA. I observed no issues or potential violations under RCRA. Therefore, no further action concerning this matter is necessary at this time. However, further EPA review may change or add to my findings. Please note that EPA reserves its enforcement authorities, including assessment of penalties, for violations that occur at any time.

If there are any questions regarding this matter, please contact me at 319-887-2618.

Sincerely,

David N. Whiting, Environmental Engineer
Environmental Field Compliance Branch
Environmental Services Division

✓ cc: Cal Lundberg, Iowa Department of Natural Resources

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

FEB 15 2012

REGION 7
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

MEMORANDUM

SUBJECT: RCRA Compliance Evaluation Inspection at
Harcros Chemicals Incorporated in Davenport, Iowa
No Findings Report – RCRA ID No. IAD022100671

FROM: David N. Whiting, Environmental Engineer
ENSV/EFCB *David N. Whiting*

THRU: *John Houlihan*
John Houlihan, Chief
ENSV/EFCB

TO: Donald Toensing, Chief
AWMD/WEMM

At the request of the Air and Waste Management Division (AWMD), a Resource Conservation and Recovery Act Compliance Evaluation Inspection (CEI) was conducted on January 31, 2012, at Harcros Chemicals, Inc. (Harcros) at 2040 West River Drive in Davenport, IA. The CEI was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. The inspection was a Level B Multi-Media Inspection. A Multi-Media Screening Checklist is attached to this report (attachment 1). Harcros has notified as a conditionally exempt hazardous waste generator. The CEI I conducted verified that Harcros is not currently generating any hazardous waste. Harcros is a small quantity generator of universal waste lamps.

Upon arrival at Harcros, I contacted Craig Bevard, Warehouse Manager, and presented him my credentials. Mr. Bevard contacted Bill Rider, District Manager, to participate in the CEI. I explained to Mr. Bevard and Mr. Rider the purpose of the CEI and the procedure I would follow, and discussed the confidentiality of business information with them. I explained to Mr. Bevard and Mr. Rider my need to collect accurate information and left with them a copy of U.S. Federal Code Sections 1001 & 1002. The inspection consisted of a discussion of facility operations and waste management practices, and a visual examination of the facility. Information collected during the CEI is recorded on data gathering sheets, which are attached to this memo (attachment 7). At the conclusion of the inspection, I had an exit briefing with Mr. Bevard and Mr. Rider. During the exit briefing, Mr. Rider acknowledged receipt by his signature of an Inspection Confidentiality Notice (attachment 2). During the exit briefing, Mr. Bevard acknowledged receipt by his signature of a Receipt for Documents (attachment 3). No claim for confidential treatment of information was made during the CEI.

Harcros is a chemical wholesaler. Harcros has tank and container storage of chemicals. Harcros conducts repackaging of chemicals into smaller containers for some customers. Harcros



also formulates specific concentrations of caustic soda and muriatic acid for some customers. Harcros does generate some wastewater from floor washing in the repackage room. The wastewater is accumulated in a 2,000-gallon tank. Mr. Bevard said that they discharge 500 to 1,000 gallons of wastewater each month to the sanitary sewer. Mr. Bevard said that the wastewater is pH adjusted if needed. Mr. Rider said that they have determined the wastewater is not hazardous waste, based upon materials used and process knowledge. Mr. Rider said that personnel from the Davenport treatment plant have inspected Harcros and determined the discharge does not need a permit from the Davenport treatment plant operators. I verified this with a phone call to the Davenport treatment plant.

Harcros is located on about 2.5 acres of property in an industrial and commercial area of Davenport. Three buildings have about 16,500 square feet of floor space (attachment 4). Nine employees staff operations one shift per day five days per week.

Harcros had an off-site shipment of hazardous waste on 07/21/11 (attachment 5). Mr. Rider said that it was a onetime disposal of a waste chemical. Harcros had notified as a large quantity generator of hazardous waste for the one time disposal. Harcros submitted an updated notification to EPA after the shipment, to amend their generator status to conditionally exempt small quantity generator.

Spent lamps are recycled through Lampmaster (attachment 6). Mr. Bevard said that they ship one box of spent lamps each year for recycling.

Attachments:

1. Region VII Multi Media Inspection Checklist (2 pages)
2. Inspection Confidentiality Notice form (1 page)
3. Receipt for Documents (1 page)
4. Building diagram and aerial image (2 pages)
5. Hazardous waste manifest and LDR (2 pages)
6. Spent lamps document (1 page)
7. Inspection data gathering sheets (8 pages)

REGION VII MULTIMEDIA SCREENING CHECKLIST

Facility Name: Harcros Chemicals Inc Inspector: David M. Whiting
 Facility Ownership: Private Primary Media: RCRA
 Street: 2040 W. River Dr. Inspector Phone Ext.: (319) 887-268
 City: Davenport State: IA Zip: 52808 Date: 1/31/12
 Phone: (563) 322-3511 Facility Contact: Rick Basketh (983) 621-7112 SIC/NAICS Code: 42469
 Number of Employees: 9 Work Hours/Shifts: 7-4:30 M-F Facility Subject to OSHA regulations Yes ☐ No ☐

Main facility activity, major process chemical(s) & description: chemical wholesaler. store & dis. chemicals
repackage some to smaller containers. Formulate spec concentrations of caustic soda
& muriatic acid for some customers by dilution. we back caustic soda & HCl muriatic
 (Check all that apply): painting/coating (water-based ☐, solvent-based ☐) , printing ☐ , reacting ☐ , formulating ☒ , distilling ☐ ,
 water treatment ☐ , refrigeration ☐ , manufacturing ☐ , parts washers/degreasing (water-based ☐ , halogenated-based ☐ ,
 non-halogenated-based ☐ , combustion (boiler, furnaces, oxidizers) ☐ plating (chrome ☐ , other space heating).

ENVIRONMENTAL JUSTICE (Note: Forward to EJ if a concern is identified during your inspection)

1. Is the facility located in an apparent low income area (e.g., with many abandoned and dilapidated properties)? No ☒ (stop) Yes ☐
 If yes, is facility less than 1000 feet from nearest routinely occupied property (house, school, etc.)? No ☐ (stop) Yes ☐ Forward to EJ

EMERGENCY PLANNING & COMMUNITY RIGHT TO KNOW ACT (EPCRA) & TOXIC SUBSTANCE CONTROL ACT (TSCA)

1. Did facility file a Tier II report with fire department, Local & State Emergency Planning Committee? Yes ☒ No ☐ Forward to EPCRA
 2. Did facility manufacture, import, or process (formulate, blend, package) >25,000 lbs of a chemical or >100 lbs of a Persistent Bioaccumulative Toxin (lead, mercury, or polycyclic aromatic compounds) at any time over the last 5 years? No ☒ (stop) Yes ☐ Forward to EPCRA
 3. Has the facility: If any box in question 3 is marked - Forward to EPCRA
 a. Stored ≥500 lbs of ammonia ☐ , ≥100 lbs of chlorine ☒ , or ≥10,000 lbs of an industrial chemical ☒ , at any time over the last 2 years? ☐
 b. Stored ≥10,000 lbs of pressurized flammable material (propane, methane, butane, pentane, etc.) at any time over the last 2 years? ☐
 c. Used ≥10,000 lbs of ammonia ☐ , chlorine ☐ , halogenated solvents ☐ , solvent-based paints ☐ , or solvents ☐ , or nitrated compound, over the last calendar year? ☐
 d. Generated ≥ one half pound of metal dusts, fumes, or metal turnings, over the last calendar year? ☐
 4. Does the facility have any oil filled electrical equipment? No ☒ (stop) Yes ☐ Forward to TSCA and ask Has facility tested oil filled equipment to determine PCB content? No ☐ Yes ☐ number containing PCBs greater than 50 ppm _____ and percent of all equipment tested _____. Is equipment leaking (including wet or weeping equipment)? No ☐ Yes ☐ - Get Photo

CLEAN WATER ACT (CWA) - National Pollution Discharge Elimination System (NPDES), Industrial Pretreatment, Storm Water, & Wetlands

1. Does the facility discharge any wastewater to storm sewers, surface water, or the land? No ☒ (stop) Yes ☐
 If yes, are all wastewater discharges permitted? Yes ☐ No ☐ Forward to CWA
 2. Does the facility have process wastewater that are discharged to a city POTW (Publicly Owned Treatment Works)? No ☐ (stop) Yes ☒
 If yes, are the discharges permitted by: State? ☐ , City? ☐ - If yes, Stop here. No ☐ Forward to CWA more needed & w city
 If yes, does the city have a state or EPA approved pretreatment program? Yes ☐ No or Don't Know ☐ Forward to CWA
 3. During rainfall events, can storm water carry pollutants from manufacturing, processing, storage, disposal, shipping and receiving areas, or from construction sites >1 acre, to storm sewers or surface water? No ☐ (stop) Yes ☐
 If yes, does the facility have an NPDES permit for these storm water discharges? Yes ☐ No ☐ Forward to CWA
 4. Did you see any wastewater discharges not identified by the facility? No ☒ (stop) Yes ☐ - Identify location, time, appearance of discharge: _____ (Get Photo) Forward to CWA
 5. Does the facility have any wetland areas (e.g. streams, ponds, or temporarily wet areas)? No ☒ (stop) Yes ☐
 If yes, have any wetland areas been dredged, filled, channeled, dammed, or had gravel removed from them within the last 5 years? No ☐ (stop) Yes ☐ - Identify location and timeframe _____ (Get Photo) FWD to Wetlands

SAFE DRINKING WATER ACT (SDWA) - Underground Injection Control (UIC) & Public Water System (PWS)

1. Does facility discharge any liquids to the subsurface (septic systems, disposal wells, cesspools, etc.)? No ☒ (stop) Yes ☐ Forward to UIC
If yes, do these liquid wastes consist of sanitary wastewater only? Yes ☐ No ☐
2. Does facility provide drinking water to 25 people or more from its own source (private well, pond, etc.)? No ☒ (stop) Yes ☐ Forward to PWS
If yes, does the facility test or monitor its drinking water in order to comply with state regulations? Yes ☐ No ☐

CLEAN AIR ACT (CAA) and CFCs

1. Do you see any dense, non-steam, smoke or dust emissions leaving the facility property? No ☒ Yes ☐ Forward to CAA
Source _____ (Get Photo)
2. Does the facility have any new air pollution emitting equipment that was constructed or installed in the past 5 years? No ☒ (stop) Yes ☐
If yes, is equipment permitted? Yes ☐ No ☐ Forward to CAA Describe: _____
3. Does the facility have any cooling units that contain >50 lbs of refrigerant? No ☒ (stop) Yes ☐ Forward to CFC
If yes, are these units: Self-serviced? ☐ Contract Serviced? ☐ - Service Company: _____
4. Does the facility have a refrigeration process that contains more than 10,000 lbs of ammonia? No ☒ (stop) Yes ☐ Forward to EPCRA/RMP
5. Does the facility service motor vehicle air conditioning systems? No ☒ (stop) Yes ☐ Forward to CFC

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) and UNDERGROUND STORAGE TANKS (UST)

1. Does the facility generate more than 30-gallons (220 lbs./100kg) of hazardous waste per month or at any one time? No ☒ (stop) Yes ☐
If yes, does facility have an EPA Hazardous Waste Identification Number? Yes ☒ (stop) No ☐ Forward to RCRA
2. Is hazardous waste treated ☐, stored >90-days ☐, burned ☐, land filled ☐, put in surface impoundments ☐ or waste piles ☐?
No ☐ (stop) Yes ☐ If yes, is the facility permitted for above described activity? Yes ☐ No ☐ Forward to RCRA
3. Did you see or does the facility have any large quantities of materials that the facility claims to be non-hazardous waste material (>10 drums, roll-offs, waste piles, etc. - exclude clean office trash, cardboard, & packaging type wastes)? No ☐ (stop) Yes ☐

Material Claimed To Be Non-Hazardous**How does the facility know these wastes are non-hazardous?**

Testing, industry or manuf. info., MSDS, etc. ☐; None available ☐ Forward to RCRA

Testing, industry or manuf. info., MSDS, etc. ☐; None available ☐ Forward to RCRA

Testing, industry or manuf. info., MSDS, etc. ☐; None available ☐ Forward to RCRA

Testing, industry or manuf. info., MSDS, etc. ☐; None available ☐ Forward to RCRA

Testing, industry or manuf. info., MSDS, etc. ☐; None available ☐ Forward to RCRA

4. Did you see any leaking hazardous waste containers, drums, or tanks? No ☒ Yes ☐ Forward to RCRA
Describe: _____ (Get Photo)
5. Did you see any signs of spills or releases (e.g., dead or stressed vegetation, stains, discoloration)? No ☒ Yes ☐ Forward to RCRA
Describe: _____ (Get Photo)
6. Did you see any chemical or waste handling practices that concern you (access to children/public)? No ☒ Yes ☐ Forward to RCRA & EPCRA Describe: _____ (Get Photo)
7. Does the facility have any past or present underground petroleum product or hazardous material tanks? No ☒ Yes ☐ Forward to UST
8. Does the facility have any underground fuel tanks for emergency generators? No ☒ Yes ☐ Forward to UST

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)

1. Does the facility have any aboveground oil tanks (petroleum, synthetic, animal, fish, vegetable), with an aggregate volume >1,320 gallons?
No ☐ (stop) Yes ☐ - Does the facility have a certified SPCC Plan? Yes ☐ No ☐ Forward to SPCC
If yes, are there secondary containment systems for the tanks? Yes ☐ No ☐ Forward to SPCC
If yes, are any tanks leaking where oil could reach waters of the State or U.S.? No ☐ Yes ☐ (Get Photo) Forward to SPCC

ENVIRONMENTAL MANAGEMENT SYSTEMS (EMS)

1. Does your facility have an EMS? No ☒ Yes ☐
2. Is the facility's EMS ISO 14001 certified? No ☐ Yes ☐

*** PLEASE TAKE PHOTOS TO DOCUMENT POTENTIAL PROBLEMS**

Version 08.23.05a

GRAY SHADED AREAS INDICATE ITEMS YOU NEED TO LOOK FOR DURING VISUAL INSPECTION

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CONFIDENTIALITY NOTICE

Facility Name <i>HarCros Chemicals, Inc.</i>	
Facility Address <i>2040 W. River Dr., Davenport IA 52808</i>	
Inspector (print) <i>David N. Whiting</i>	
U.S. EPA, Region VII, 901 N. 5th St., Kansas City, KS 66101	Date <i>1/31/12</i>

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. No statute specifically requires disclosure of the information.
3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print) <i>Bill Rider</i>	Signature/Date <i>[Signature]</i> Jan 31, 12

I have received this Notice and <u>DO</u> want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date

Information for which confidential treatment is requested:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name <i>Harcros Chemicals, Inc.</i>
Facility Address <i>2040 W. River Dr. Davenport IA 52808</i>

Documents Collected? YES ☒ (list below) NO ☐

Samples Collected? YES ☐ (list below) NO ☒ Split Samples: YES ☐ NO ☐

Documents/Samples were: 1) Received no charge ☒ 2) Borrowed ☐ 3) Purchased ☐

Amount Paid: \$ Method: Cash ☐ Voucher ☐ To Be Billed ☐

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

- 1) *Spent lamp render document, 7/14/11*
- 2) *Manifest & LDR, 7/21/11*
- 3) *Plant Diagram, current*

Facility Representative (print) <i>Chris Bevard</i>	Signature/Date <i>Chris Bevard</i> 1/31/12
Inspector (print) <i>David M. Whiting</i>	Signature/Date <i>David M. Whiting</i> 1/31/12
U.S. EPA, Region VII, 901 N. 5th Street, Kansas City, KS 66101	

(rev: 1/20/93)



HARCROS CHEMICALS INC. DAVENPORT, IA

Typical Evacuation Routes

Not to Scale
1/17/12

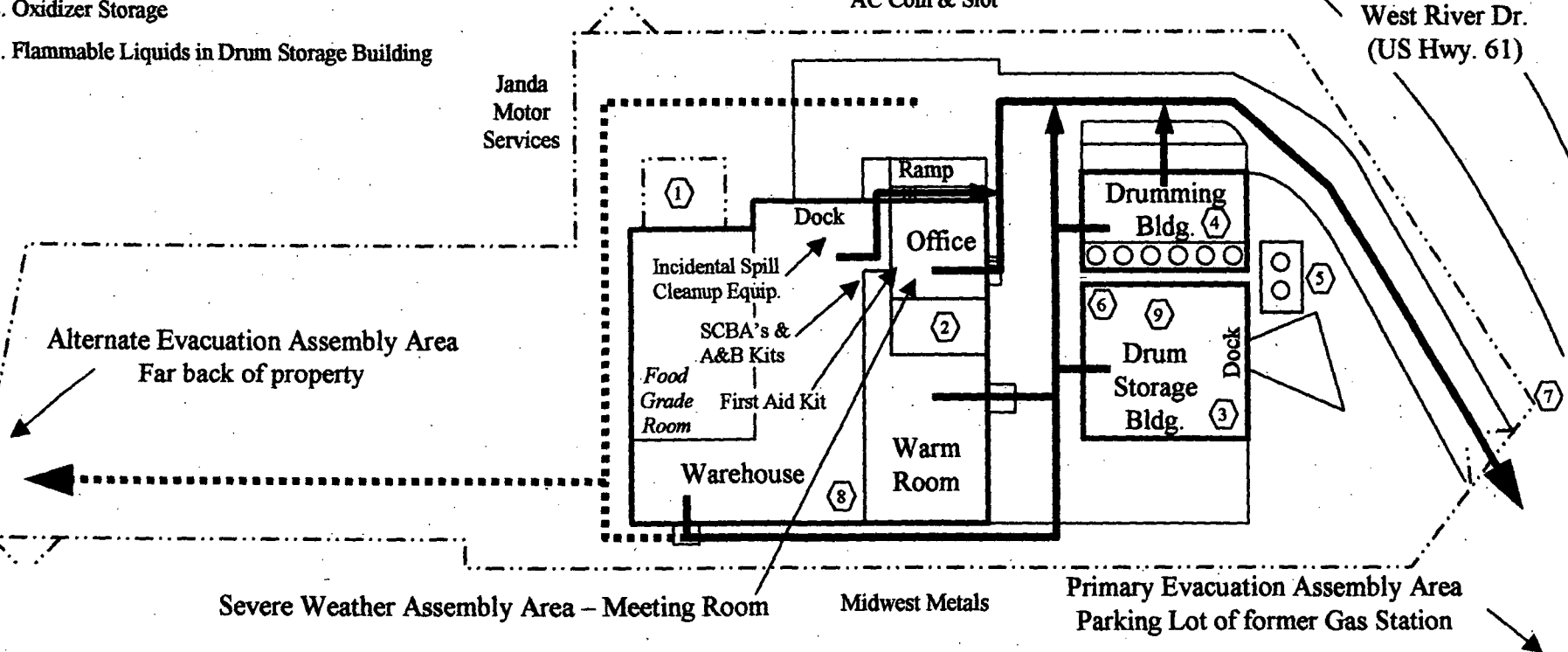
1. Ton Chlorine & Sulfur Dioxide Storage
2. Locker & Boiler Rooms
3. Empty Drum Storage
4. Bulk Tanks inside Drumming Building: Bleach, Caustic Potash, Caustic Soda, and Surfactants
5. Outdoor Bulk Storage: Sulfuric Acid
6. Chlorine & Sulfur Dioxide 150# Cylinder Storage
7. City Fire Hydrants
8. Oxidizer Storage
9. Flammable Liquids in Drum Storage Building

ATTACHMENT 4 Page 1 of 2

Janda Motor Services

AC Coin & Slot

West River Dr.
(US Hwy. 61)



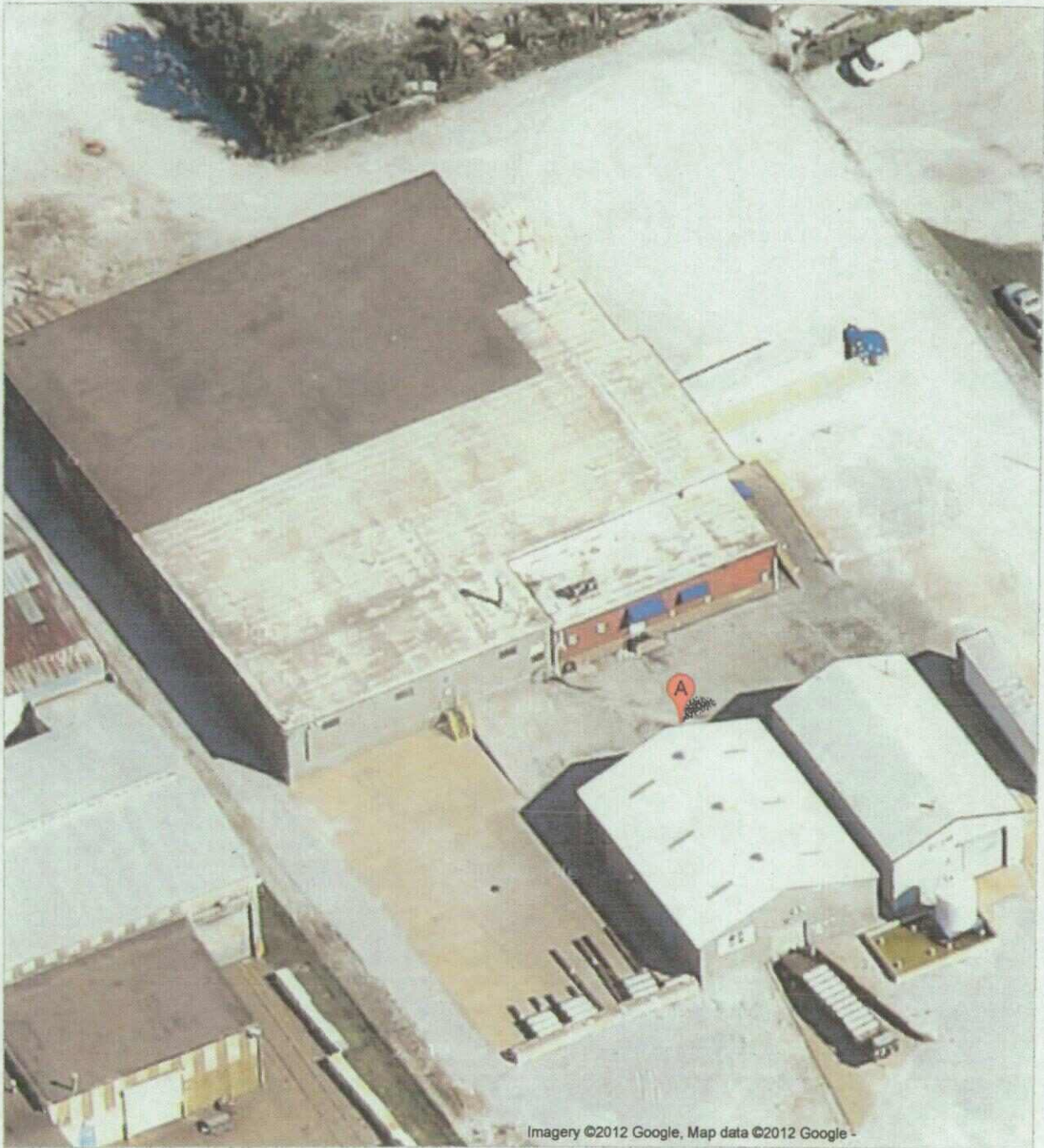
Severe Weather Assembly Area - Meeting Room

Midwest Metals

Primary Evacuation Assembly Area
Parking Lot of former Gas Station

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To see all the details that are visible on the screen, use the "Print" link next to the map.



Imagery ©2012 Google, Map data ©2012 Google

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number IAD 022 100 671	2. Page 1 of 1	3. Emergency Response Phone 800-424-9300	4. Manifest Tracking Number 008251741	
5. Generator's Name and Mailing Address 2040 W. RIVER DR ATTN: CRAIG BEVARD DAVENPORT IA 52802		Generator's Site Address (if different than mailing address) 2040 W. RIVER DR DAVENPORT IA 52802				
6. Transporter 1 Company Name TRIAD TRANSPORT INC.		Generator's Phone (563) 322 3511		U.S. EPA ID Number K50002336891		
7. Transporter 2 Company Name Savannah Transport				U.S. EPA ID Number OKD 081 588 704		
8. Designated Facility Name and Site Address 1923 FREDERICK DETROIT, MI 48211		EQ DETROIT, INC.		U.S. EPA ID Number MID 980 991 566		
Facility's Phone: (313) 347-1300		1375				
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X ¹	UN2055, WASTE STYRENE-MONOMER, STABILIZED, 3, PGIII, D001	34	DM	1870	G	D001 1310
X ²	UN2811, TOXIC SOLID, ORGANIC, N.O.S. (4-TERT-BUTYL CATECHOL), 6, PGIII	5	DF	5	G	NONE
14. Special Handling Instructions and Additional Information 01. G113061DET / STYRENE MONOMER 02. F113042DET / 4-TERT-BUTYL CATECHOL Emergency Contact name and number: Chemtec 800-424-9300						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Officer's Printed/Typed Name Craig Bevard		Signature Craig Bevard		Month Day Year 7/21/11		
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit: Date leaving U.S.				
17. Transporter Acknowledgment of Receipt of Materials		Signature David Fox		Month Day Year 7/21/11		
18. Discrepancy		Signature David Fox		Month Day Year 7/21/11		
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection		OK TO ADD (1) WASTE CODE FOR RES BEVARD - 7/21/11				
18b. Alternate Facility (or Generator)		U.S. EPA ID Number				
Facility's Phone:						
18c. Signature of Alternate Facility (or Generator)		Month Day Year				
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1. H141		2. None		3. None		
20. Designated Facility Owner, or Operator, Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a						
Printed/Typed Name David Fox		Signature David Fox		Month Day Year 7/21/11		



THE ENVIRONMENTAL QUALITY COMPANY

Land Disposal Restriction & Certification Form

EQ Detroit, Inc. (MID980991566)

1923 Frederick
Detroit, MI 48211

July 14, 2011

Generator: HARCROS CHEMICAL (IAD022100671)

2040 W. RIVER DR
DAVENPORT, IA 52802

State Manifest #: 008251741JJK

Manifest Doc. #:

Manifest Line: 1-01 Non-WasteWater

Approval: G113061DET

U.S. EPA Hazardous Waste Code(s):
131U D001

Subcategory: D001 - High TOC

Reference Number(s) of Hazardous Constituents contained in the waste:
How Must the Waste Be Managed?**A THIS RESTRICTED WASTE REQUIRES TREATMENT TO THE APPLICABLE STANDARD**

This waste must be treated to the applicable performance based treatment standard set forth in 40CFR Part 268 Subpart C and Subpart D, 268.40 or RCRA Section 3004(d) prior to land disposal.

1. Craig Beward
Authorized Generator SignatureCraig Beward
Printed Generator Name

hereby certify that all information for the Approval(s) listed above is accurate and complete.

Company Name:

Harcros Chemicals

Date:

July 24, 2011**YOUR BUSINESS. OUR SOLUTIONS. A PRODUCTIVE PARTNERSHIP®**

Mail or fax to: EQ Detroit, Inc., 1923 Frederick, Detroit, MI 48211, Phone: 1-800-592-5489 Fax: 1-800-592-5329

Lampmaster Receipt

*** PLEASE PRINT RECEIPT OUT AND RETAIN IT FOR FUTURE REFERENCE ***

Order Number: 101405
Customer ID: 2531
Email: cbevard@harcros.com
Date of purchase: 7/14/2011 11:43:10 AM
Coupon Entered: None
Locale Setting: None
Payment Method: PURCHASEORDER
PO Number: 06540A

Account	Billing Address
Name:	CraigBevard
Company:	Harcros Chemicals
Address:	2040 West River Drive
City:	Davenport
State/Province:	IA
Zip:	52802
Country:	United States
Phone:	563-322-3511

Shipping Address
CraigBevard
Harcros Chemicals
2040 West River Drive
Davenport
IA
52802
United States
563-322-3511

Product	Quantity	Sub Total:
4ft Lampmaster Recycling Kit SKU: B4LM	1	\$74.95

Subtotal:	\$74.95
Shipping (FREE SHIPPING):	\$0.00
Tax:	\$0.00
Total:	\$74.95

Thank you for your purchase.

Lampmaster
<https://www.lampmaster.com/>

Appendix 1-1

DATA GATHERING WORKSHEET AND CHECKLIST INSTRUCTIONS AND KEY

1. Complete all items on the applicable data gathering worksheet and checklist in a neat and legible fashion.
2. All responses will be based on the inspector's knowledge and best judgement and information obtained from facility the representative(s) at the time of the inspection.
3. A (✓) mark should be used to mark the all boxes (□) and will indicate the choice made or the action completed.
4. The Records Review Worksheet and Checklists and the Visual Review Worksheet and Checklists each have a key below the tables. Use this key when filling out these forms.
 - a. Items which are shaded gray on the worksheets and checklists are considered high priority items during inspections and should always be completed.
 - b. On the top of the worksheets and checklists are a group of boxes which represent the generator status of the facility and whether or not the facility is subject to interim status or permit requirements. The appropriate box should be checked.
5. The inspector should pay special attention to the questions contained in this box and make sure that they are able to answer them as relates to inspection documentation.

DOCUMENTATION: *HOW* are the facts known? *WHO* said what? *WHEN* did it happen? *HOW* long did it happen? and *WHAT PROOF WAS OBTAINED?*

6. Each of the forms has a space at the bottom to indicate the Attachment number and page when the form is included in the report. The attachment number and page should be used when referencing information contained on the form in the inspection report.

Appendix 1-2

PRE-INSPECTION ITEMS TO CHECK

General Equipment:	- hardhat - safety glasses - camera - calculator - GPS unit - post-its - coveralls - film - pH paper	- rubber boots - tape measure - notebook - compass - tape recorder - safety gloves - safety boots - ice chest - batteries	- safety shoes - back-up camera - flashlight - binoculars - pens/markers - winter gloves - ear plugs - coat - respirator
--------------------	--	---	--

Special Equipment?: _____

Paperwork:	- NOV, CBI & Rec. for Doc. forms - Reference Information - Data Collection Worksheets	- Notification forms - Regulations (Federal/State)	- Multi-Media form - Facility Files
Items Needed:	- Load Camera - Change Phone Message - Change Phone Message	- Credentials - Car Book/Keys/Credit Card - Sign-out On Board Considerations?	- Daily Planner - Business Cards - Special Health or Safety

Notes: _____

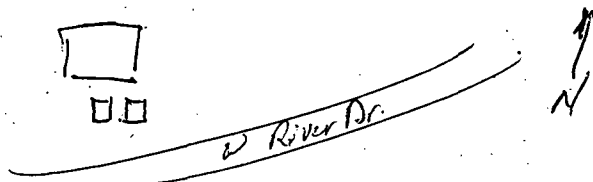
Appendix 1-3

Facility: Harcross Chemicals Date: 1/31/12 Arrival time: 9:30

DRIVE-BY

1. Drive-by conducted from public right-of-way? ☒ Yes ☐ No

2. Determine the direction "North" with respect to the facility and provide a brief sketch of the layout and orientation (as can be viewed from the public right-of-way):



3. Obvious concerns visible from public right-of-way (photos)? ☐ Yes ☒ No

- Containers
- Unloading Areas
- Unusual Staining
- Safety Concerns

- Tanks
- Security Devices
- Unusual Odors
- Other Concerns

- Processing Equipment
- Open Drums
- Obvious Discharges

- Loading Areas
- Stressed Vegetation
- Improper Disposal

Appendix 1-4**SITE ENTRY AND INBRIEFING**

1. ☒ Used main entrance ☒ Entered during normal operating hours ☐ Excessive delays (>15 minutes - denial of access?) - ☒ No

2. Facility Representative(s): Craig Bevard Title: Warehouse Mgr.
Bill Rider Title: Dist. Mgr.
Terry Shoemaker Title: Warehouse worker

3. Does representative have intimate knowledge of all waste management practices? ☒ Yes ☐ No

How long in position? 2 1/2 yr

4. Introduction:

- ☒ Presented credentials
- ☒ Explained responsibility to provide accurate information and provided copies of Section 1001 and 1002 U.S.C. to facility
- ☒ Verified presence at correct facility (checked address/I.D. #)
- ☒ Explained authority to conduct inspection (Section 3007 of RCRA)
- ☒ Explained the purpose, scope, and order of the inspection
- ☒ Completed Multimedia screening checklist
- ☒ Explained documentation process - worksheets, checklists, photos, notes, statements, etc
- ☒ Provided SBRFA
- ☒ Obtained GPS reading
- ☒ Explained facility's right to claim CBI

5. Was full access granted? ☒ Yes ☐ By facility representative or Other (name): _____

☐ No - Access denied. Name of person denying access: _____

Time of denial: _____

Reason for denial, or limitations placed on access: _____

Appendix 1-5

FACILITY BACKGROUND WORKSHEET

1. Site History:

Date facility began operating: _____ Number of employees: 9
 Number of shifts/hour worked: 1 shift Number of days worked per week: 5 d/w
 Size (sq. ft., how divided): ~2.5 acres (industrial area) ~16,500 ft² 3 bldgs.

Property owner and facility operator the same? ☒ Yes ☐ No

2. Major products or services provided: chemicals wholesales. repackaging some chemicals into smaller containers. formulate specific concentrations of caustic soda & muriatic acid in repack room for some customers

3. Major raw materials used: various chemicals stored

4. Major manufacturing or processing operations which generate waste streams: (provide brief description)

Operation/Process

Waste Stream(s)

Warehouse	Floor sweep
packaging (repackaging)	
3 5 gal 330 gal totes some 15 gal 5,000 gal tanker to caustic (50% liquid)	
repack room floor wash	500 - 1,000 gal / mo. (acc. in 2000 ord tank no discharge permit needed verified w/ call to POTW & CRI)
lift trucks - repair by lift it contractor 40-gal w/ cont.	
spend temps recycled - 1 box / year (empty full)	Lampmaster prep shipping boxes & recycle
general trash hauler Millenium Waste	

5. Complete a Generator Waste Stream Worksheet and/or Off-Site Waste Stream Worksheet for the waste streams noted above and then finish this form.

6. Verified/compared above information with facility Notification Form: ☒ Yes ☐ No

notified as LQG 4 1/2 shipment in July '11; after amended notification to CESQGS.

7. **GENERATOR STATUS:** (based on records review)

☒ Non-generator

☐ CE (0-100kg/mo or 1 kg/mo acute waste and accumulate <1000 kg or 1kg acute waste or 100 kg of acute spill residue)

☐ SQG (100-1000kg/mo and accumulate <6000kg)

☐ LQG (>1000kg/mo)

Is facility's status solidly within above category?
(If not carefully verify status and document)

☒ Yes ☐ No

not currently generating any hazardous waste.

8. **TSD STATUS:**

☐ Treatment

☐ Storage

☐ Disposal

Note: Types of units, number of units, capacities, processes, etc:

1/12

9. Resolved questions from Pre-Inspection Worksheet?

☐ Yes

☐ No

☒ No Questions

10. Resolved compliance officer's questions from Pre-Inspection Worksheet?

☒ Yes

☐ No

☐ No Questions

11. Requested site map or diagram to identify all observations?

☒ Yes

☐ None Available

J. USED OIL – RCRA INSPECTION CHECKLIST

1. What Used Oil activities does the facility engage in? has lift trucks. Craig Berard said maintenance on lift trucks done by contractor who takes the used oil for recycling as part of service
- a. Type of used oil generated? _____
- b. Amount of used oil generated? not determined

40 CFR 279.12 Prohibition Questions

1. Is used oil being managed only in a surface impoundment or waste pile subject to regulation under 40 CFR Parts 264 or 265?
☐ Yes ☐ No ☐ Not Applicable (NA)
2. Is used oil being used as a dust suppressant? ☐ Yes ☐ No
3. Is off-specification oil fuel burned for energy recovery in only industrial furnaces, industrial boilers, utility boilers, used oil-fired space heaters, or hazardous waste incinerators identified in 40 CFR Part 279.12 (c)(1-3)? ☐ Yes ☐ No

Subpart C – Standards for Used Oil Generators

(Check here ☐ if this section is NA)

Instructions: Fill out this section if the facility generates used oil or if facility activities first caused the used oil to become subject to regulation (see definition and applicability of used oil generator in 40 CFR 279.20). Used oil generators are subject to all applicable Spill Prevention, Control and Countermeasures (SPCC) requirements (40 CFR Part 112) and underground storage tank standards (40 CFR Part 280) in addition to the requirements of Subpart C.

Regulation and Standard		Violations
279.21 Hazardous Waste Mixing		
1. Is the generator mixing hazardous waste with used oil?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
If yes, is the generator of a used oil containing greater than 1,000 parts per million (ppm) total halogens managing the used oil as a hazardous waste unless the used oil presumption is rebutted?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
2. Are analytical data available?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
279.22 Used Oil Storage		
1. Does the generator only store used oil in tanks, containers, or units subject to regulation under 40 CFR Parts 264 or 265?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
2. Are containers and aboveground tanks used by a generator to store used oil in good condition, with no visible leaks?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
3. Are containers, aboveground tanks, and fill pipes used for underground tanks labeled or marked "Used Oil"?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
4. Upon detection of a release of used oil, has the generator		
a. Stopped the release?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
b. Contained the release?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
c. Cleaned up and managed the used oil and other materials?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
279.23 Used Oil Storage		
1. Is the generator burning used oil in used oil fired space heaters only when		
a. The heater burns only used oil that the owner or operator generates or used oil received from household do-it-yourself generators?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
b. The heater is designed to have a maximum capacity of not more than 0.5 million British Thermal Units per hour?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
c. The combustion gasses from the heater are vented to ambient air?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	

K. Universal Waste (UW)

1. Universal Waste Generated

Waste: Fluorescent & HID Lamps Batteries Hg-containing equip. and/or thermostats Pesticides

Qty. Generate/year: box ~ 40 lamps _____ _____ _____

Qty. Presently in storage: 200 _____ _____ _____

Accumulation Time: 6 mo. _____ _____ _____

Present Disposal Method: UW recycling _____ _____ _____

2. Person(s) responsible for universal waste management: _____

3. Does the universal waste handler accumulate (collectively) 5,000 kilograms or more at any time (40 CFR 273.9)? If YES, a large quantity handler (LQH), go on and also refer to checklist in Appendix 2-2. If NO, a small quantity handler (SQH), go on.

Assessing Requirements Common to Universal Waste SQH & LQH (40 CFR 273 Subpart B & C, respectively):

#	✓/x	REGULATORY REQUIREMENTS*	COMMENTS
1.	✓	Disposal of UW is not occurring-273.11(a)/273.31(a)	
2.	✓	Diluting or treating universal waste is not occurring, except for responding to releases per 273.17 or by managing specific wastes per 273.13 (waste management)-273.11(b)/273.31(b)	
3.	N/A	Has the LQH notified of UW management?-273.32 (a)(1) (not required for SQH)	
4.	✓	Has UW been shipped to another UW handler, a designated facility, or a foreign destination?-273.18(a)/273.38(a) If not, see Appendix 2-2 for off-site shipments	
a.		Does LQH have documentation tracking shipments?-273.39 (not required for SQH-273.19)	
5.		UW package, container, tank, vessel or transport vehicle is marked or labeled-273.14/273.34-as follows:	
a.		"Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)"-273.14(a)/273.34(a)	
b.		For recalled universal waste pesticides; "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)," and the label that was on or accompanied the product as sold or distributed, or if the label is not available or not feasible to use, the appropriate DOT label as identified in 49 CFR 172-273.14(b)/273.34(b)	
c.		For unused pesticide products as described in 40 CFR 273.3(a)(2): (1) the label that was on the product when purchased, if still legible; (2) if using that label is not feasible, the appropriate label required under DOT regulation 49 CFR Part 172; (3) if using either of the previously described labels is not feasible, another label prescribed or designated by the waste pesticide collection program administered or recognized by a state; and (4) the words "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)"-273.14(c)/273.34(c)	
d.		"Universal Waste-Mercury Containing Equipment," or "Waste Mercury-Containing Equipment," or "Used Mercury-Containing Equipment"-273.14(d)(1)/273.34(d)(1) Thermostats may be labeled: "Universal Waste-Mercury Thermostat(s)," or "Waste Mercury Thermostat(s)," or "Used Mercury Thermostat(s)"-273.14(d)(2)/273.34(d)(2)	
e.	✓	"Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)"-273.14(e)/273.34(e)	box is dated, marked, closed

6.	<p>Accumulation Time Limits – 273.15/273.35</p> <p>A UW handler may accumulate universal waste no longer than a year from the date of generation or receipt from another handler, unless the requirements of paragraph 273.15(b) are met, as follows:</p>	<p>C. Bevard said the trucks annual shipping on his pc & ships off a box empty full or not each year.</p> <p>Use hamper prepaid recycling containers.</p>
a.	<p>Storage over one year is solely for the purpose of accumulation of such quantities as necessary to facilitate proper recovery, treatment, or disposal and the handler provides proof of this – 273.15(b)/273.35(b)</p> <p>For further requirements of UW retention time documentation, see Appendix 2-2.</p>	
7.	<p>Employee Training – 273.16/273.36</p> <p>The UW handler must inform all employees who handle or have responsibility for managing universal waste of the proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility.</p>	
8.	<p>Response to Releases – 273.17/273.37 – Did you observe any releases or did any releases occur? – if yes, see Appendix 2-2.</p>	
9.	<p>Handlers of universal waste that self-transport universal waste off-site become a universal waste transporter for those self-transportation activities and must comply with the transporter requirements of subpart D of this part while transporting the universal waste – 273.18(b)/273.38(b) – and see Appendix 2-2.</p>	

Appendix 1-10

EXIT BRIEFING

1. Reviewed all data collected and documented all concerns or violations? ☒ Yes ☐ No
- Location of the violation, type and amount of waste involved, time frame, frequency, specific dates & when first started occurring.
 - Illegal units-unit location (diagram/picture), dimensions, conditions, construction material, gradient of the base (for spills), other information.
 - Illegal disposal-how, when (each occurrence), where sent or disposed of, how shipped, who shipped, when shipped/disposed of, quantity.

- ☒ Identified/verified violations from previous inspection were corrected (if applicable)
- ☒ Addressed all unresolved inspection related issues
 - ☒ Summarized findings and observations for the facility representatives

NOV issued? ☐ Yes ☒ No ☐ Violations clearly identified and explained, including: circumstances, location, and applicable regulations

- ☐ Explained the importance of a timely (14 day) and adequate response
- ☒ Explained that findings and observations are based on your current knowledge of RCRA and that the final findings may differ
- ☒ Explained that compliance officer will make final compliance decisions and that all compliance questions should be directed toward them
- ☒ Explained that recommendations provided are for informational purposes only and DO NOT require specific actions by the facility
- ☒ Provided facility with CBI form
- ☒ Prepared Document Receipt form

3. Specific information requested from facility? ☐ Yes ☒ No

4. Facility appears to have awareness of RCRA regulations? ☒ Yes ☐ No

5. Facility has its own environmental staff? ☒ Yes ☐ No

6. Facility has copy of applicable regulations? ☒ Yes ☐ No

7. Attitude and demeanor of facility representative(s), ☒ OK ☐ Not OK

8. Notes/Observations: