## Fw: TPI Iowa LLC - IAR000510156 - RCRA Compliance Evaluation Inspection

Gary Witkovski to: Marlene White 04/30/2012 03:32 PM

----- Forwarded by Gary Witkovski/R7/USEPA/US on 04/30/2012 03:32 PM -----

From: "Lloyd, David" <DLloyd@tpicomposites.com>
To: Gary Witkovski/R7/USEPA/US@EPA
Cc: <nelles_clifford@bah.com>, "Parriott, Mark" <MParriott@tpicomposites.com>, "Bailey, Jim" <JBailey@tpicomposites.com>
Date: 04/30/2012 03:08 PM
Subject: TPI Iowa LLC - IAR000510156 - RCRA Compliance Evaluation Inspection

Mr. Witkovski – I am contacting you in response to a RCRA Compliance Evaluation inspection that occurred at our Newton, IA facility on April 18, 2012. The inspection was conducted by Clifford Nelles of ASE Inc. Mr. Nelles concluded his inspection by providing an explanation of each of his findings, which were documented on a Notice of Preliminary Findings form (of which he provided a copy to TPI).

I confirm that TPI understands all of findings made and presented by Mr. Nelles. I also confirm that TPI is actively taking action on each the findings to ensure any compliance gaps are promptly closed. We are presently focusing our attention to the following hazardous waste requirements to ensure both immediate and long term compliance:

1. Satellite accumulation and storage areas
2. Emergency contingency planning
3. Employee training

We anticipate receiving Mr. Nelles' inspection report in the coming weeks and will formally respond to the report as instructed. In the meantime, please do not hesitate to contact me if you require any additional information.

Thank you,

Dave Lloyd, CSP
Corporate EHS Engineer
TPI Composites, Inc.
Office: 401-247-4096
Mobile: 401-578-8964
Fax: 401-247-2669

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**Fw: TPI Iowa LLC - IAR000510156 - RCRA Compliance Evaluation Inspection**

Gary Witkovski to: Marlene White 05/16/2012 11:08 AM

----- Forwarded by Gary Witkovski/R7/USEPA/US on 05/16/2012 11:08 AM -----

From: "Lloyd, David" <DLloyd@tpicomposites.com>
To: Gary Witkovski/R7/USEPA/US@EPA
Date: 05/16/2012 10:59 AM
Subject: RE: TPI Iowa LLC - IAR000510156 - RCRA Compliance Evaluation Inspection

Thank you.

I am attaching information that addresses NPOF #'s 7-12 listed on Cliff Nelles handwritten NOPF form, dated 4/18/2012. This information consists of TPI's updated Hazardous Waste Emergency Contingency Plan (ECP) and proof of submission to/receipt by local emergency response authorities. I have also included an updated copy of our written Hazardous Waste Management and Disposal Plan which is being used as the basis to address NOPF #'s 1-6 and 13. Work continues on NOPF #'s 1-6 and 13-15 and more detailed information will be forthcoming.

If you have any immediate questions please do not hesitate to contact me.

Thank you, Dave Lloyd

Dave Lloyd, CSP
Corporate EHS Engineer
TPI Composites, Inc.
Office: 401-247-4096
Mobile: 401-578-8964
Fax: 401-247-2669

**From:** Gary Witkovski [mailto:Witkovski.Gary@epamail.epa.gov]
**Sent:** Wednesday, May 16, 2012 10:18 AM
**To:** Lloyd, David
**Subject:** RE: TPI Iowa LLC - IAR000510156 - RCRA Compliance Evaluation Inspection

I request to you respond to the NOPF as soon as possible. That way I can include your response when I finalize the report. If you have any additional questions, please contact men.

"Lloyd, David" ---05/16/2012 09:29:30 AM---Mr. Witkovski - we have begun to complete actions taken in response to the above referenced inspecti

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To: Gary Witkovski/R7/USEPA/US@EPA
Cc: <nelles_clifford@bah.com>
Date: 05/16/2012 09:29 AM
Subject: RE: TPI Iowa LLC - IAR000510156 - RCRA Compliance Evaluation Inspection

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Thank you – Dave Lloyd

**From:** Lloyd, David
**Sent:** Monday, April 30, 2012 3:08 PM
**To:** 'witkovski.gary@epa.gov'
**Cc:** Nelles, Clifford [USA] (ASE) (nelles_clifford@bah.com); Parriott, Mark; Bailey, Jim
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TPI Composites, Inc.
Office: 401-247-4096
Mobile: 401-578-8964
Fax: 401-247-2669

EHS 010 Hazardous Waste Management and Disposal Plan - Copy.docx

EHS-011 Hazardous Waste Contingency Plan - Copy.docxLQG notification and ECP Letter - NFD.pdf

LQG notification and ECP Letter - NPD.pdf

## 1. Overview

In the course of business, TPI Iowa LLC (TPI) generates hazardous wastes. TPI has developed these instructions to meet the requirements of OSHA 40 CFR 260 to 265.

## 2. Hazardous Waste Management

Materials are considered to be Hazardous Waste if they meet any of the following criteria:

I. They are listed by the U.S. Environmental Protection Agency in 40 CFR 261 Subpart D (a listed waste). (Note that some wastes are defined as "acutely hazardous waste" and therefore the quantity which can be temporarily stored on-site is limited. Section 2.2 provides more information).

II. They demonstrate ignitability, corrosively, reactivity, or toxicity as outlined in 40 CFR 261 Subpart C (a characteristic waste).

TPI's predominantly generated hazardous waste types are flammable liquids and flammable solids. A listing of TPI's routinely generated hazardous waste profiles are listed in Appendix A.

## 3. Handling Flammable Hazardous Wastes

Hazardous waste flammable liquids and solids are generated primarily from cleaning tools and equipment that comes in contact with paint and epoxy resin. These wastes are collected at or close to the point of generation in satellite accumulation containers . Employees are responsible for placing hazardous flammable wastes they generate into the proper satellite hazardous waste collection container.

When a satelliteaccumulation drum is full a Warehouse employee is contacted. The warehouse employee is responsible for closing (including labeling and dating) and immediately transferring the full drum to the plant's Hazardous Waste Storage area. The warehouse employee is also responsible for providing a properly prepared, empty satellite accumulation drum.

## 4. Hazardous Waste Storage Area

Hazardous waste is stored in a fire rated chemical storage building which is located outsideofthe northeast corner of the building. The storage building has a maximum storage capacity of 10 drums, is equipped with adequate secondary containment, a portable fire extinguisher, and spill cleanup materials. The building is kept locked and is only accessible by Warehouse employees.

## 5. Time Limits

TPI may keep hazardous wastes on site for no more than 90 days. However, the actual maximum amount of time hazardous waste is stored on site is typical less than 14 days.

**6. Labeling Requirements**

Each container must be labeled with the following information:

I. The words: "Hazardous Waste – Federal Law prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the US Environmental Protection Agency"
II. TPI's EPA Waste Number. **IAR005510156**
III. DOT proper shipping name.
IV. DOT Hazard Label.
V. Our Name and address: **TPI Iowa LLC.**
**2300 N 33rd Avenue**
**Newton, IA 50208**

Preprinted hazardous waste drum labels (containing all of the above information) are provided by hazardous waste disposal contractor for each type of hazardous waste generated by TPI.

**7. Weekly Inspections**

The Warehouse staff is responsible for inspecting the hazardous waste storage area every week. An inspection form has been set up and is located on a clipboard inside the hazardous waste storage building.

The inspection will include:

I. Inspector's initials
II. Time/date of inspection
III. Number of drums in storage
IV. Ensure drums are properly closed
V. Ensure no signs of leakage
VI. Confirm area is dry
VII. Note if there is evidence of spill and action taken to clean it up
VIII. Confirm proper labeling on drums, including an accumulation start date. Ensure labels are no further apart than 3 inches and are always visible for inspection.

Any issues should be addressed immediately and noted or reported to the EHS Coordinator. All completed forms are maintained by the Warehouse Supervisor.

**8. Shipping Hazardous Waste**

Hazardous waste may not be stored on site for a period of more than 90 days (beginning when the waste is placed in the hazardous waste storage area). The following are instructions on how to make arrangements to ship our hazardous waste. (Note: Only an employee trained to ship hazardous materials may do so):

I. Contact the Purchasing Department to schedule a pickup.
   a. If you have an unusual, one-time waste, contact the hazardous waste disposal contractor to obtain pre-approval prior to pick-up.
II. When the truck arrives, stand by and observe as all drums are loaded.
III. The driver will have new labels with him which he will place over our labels. These labels have more detailed information than ours about shipping names and UN numbers. They will also have a reference to the manifest number on each label, check that this is correct.
IV. Check the USEPA ID number and make sure that is correct – TPI's USEPA ID number is **IAR005510156**

V. Once the shipment is loaded, you will need to go over the paperwork with the driver. He will have two or three different forms – hazardous waste manifest, non-hazardous waste manifest and/or land ban restriction forms.

VI. Review the forms to ensure the information is correct before you sign.

VII. Once the paperwork is complete, ask the driver to placard the truck. This is the generator's (TPI's) responsibility under the law. Most of what we ship is flammable, so he should turn the placards on all four sides of his truck to the red number 3 flammable sign before he drives off. Watch him until he has left our property.

VIII. Forward the signed copies of all the paperwork to the EHS Coordinator

a. Maintain the paperwork in the Hazardous Waste Manifest file.

b. The disposal facility will mail a signed copy of the manifest back to TPI within 45 days. This manifest shall be filed in the Hazardous Waste Manifest file by the EHS Coordinator.

**9. Record Keeping**

Hazardous waste records will be kept indefinitely.

**10. Reporting**

Annual hazardous waste data is required to be submitted to EPA Region 7 on a biennial basis for odd numbered years.

**11. Training**

An annual review will be conducted for all employees involved in handling or overseeing the disposal of hazardous wastes.

**12. Hazardous Waste Minimization**

TPI continues to explore methods and make efforts to reduce the volume and toxicity of hazardous waste generated to the degree which has been determined to be economically practicable. We have also selected the most practicable methods of treatment, storage, or disposal currently available to us which minimize the present and future threat to human health and the environment.

**Appendix A**
**Currently Approved Hazardous Waste Profiles**

| Waste Description | EPA Waste Code(s) | Hazard Class |
|---|---|---|
| Acetone | F003, D001 | Flammable Liquid |
| Paint related materials | D001, D035, F003, F005 | Flammable Liquid |
| Solvent contaminated rags | D001, F003 | Flammable Solid |
| Epoxy Hardener | D002 | Corrosive |
| Misc. Flammable Liquids | D001 | Flammable Liquids |

***Revision History***

| Prepared By | Rev | Date | Reason for Change |
|---|---|---|---|
| Craig Althof | A | 5/10/2012 | Initial issue of document |

## 1. Overview

Large Quantity Generators of hazardous waste are required to prepare a formal written plan outlining specific steps that company personnel will take in response to spills, fires, and explosions or any unplanned release involving hazardous wastes which could threaten health or the environment. This document outlines TPI Iowa LLC Inc.'s (TPI) hazardous waste contingency plan.

## 2. Hazardous Waste

TPI presently generates over 6 different types of hazardous waste, 3 of which constitute more than 90% of TPI's total hazardous waste. These hazardous wastes are:

1. Waste paint related materials (flammable liquids)
2. Waste acetone (flammable liquids)
3. Waste solvent contaminated solid materials (e.g., acetone rags – flammable solids)

Hazardous waste is accumulated in satellite hazardous waste accumulation containers (55 gallon steel drums) stationed throughout the plant. Containers accumulating hazardous wastes that are characterized as flammable liquid (e.g., paint related materials and acetone) are individually stored in flammable liquid storage cabinets. Hazardous waste (full accumulation containers) is stored in a fire rated chemical storage building that is located outside of the northeast corner of the building. This building has a storage capacity of 10 drums, has a secondary containment in excess of 75 gallons, and is equipped with a portable fire extinguisher and spill containment materials. Hazardous waste storage is limited to 90 days, but is typically stored for a maximum of 14 days due to the availability of weekly hazardous waste pick-ups. The hazardous waste storage building is kept locked and is only accessible by authorized employees.

## 3. Emergency Coordinators

The emergency coordinators listed below are authorized to act as on-scene coordinators and to commit the necessary resources during an emergency. Actions taken by the emergency coordinator may include stopping processes and operations, collecting and containing waste, as well as removing or isolating containers. There shall always be at least one coordinator (primary or alternate) either on the company premises or on-call.

Emergency coordinators must be familiar with all aspects of the contingency plan, all operations and activities at the company, the locations and characteristics of wastes handled and stored, the location of all environmental records, and the physical layout of the company.

Emergency coordinators must be prepared to act quickly to protect employees while taking reasonable measures to ensure that fires, explosions, and/or releases do not occur, recur, or spread to other areas in the building. These measures shall include stopping processes and operations, collecting and containing released waste and removing or isolating containers.

The Emergency Coordinators at TPI Iowa LLC are:

| Primary Coordinator | Address | Home Phone | Mobile Phone |
|---|---|---|---|
| Jim Bailey | [redacted] | [redacted] | [redacted] |

Ex. 6 PII

| Alternate Coordinator | Address | Home Phone | Mobile Phone |
|---|---|---|---|
| Rich Myers | [redacted] | [redacted] | [redacted] |

Ex. 6 PII

***To report a serious emergency requiring local police, fire, or medical support,* Dial 8 and then 911**

A dispatcher will answer your call. Describe the nature of the emergency and the location in the facility (front, back, right side, or left side of the building). When the emergency crew arrive, someone should meet them outside the building and direct them where needed.

**4. Emergency Procedures**

During an emergency involving hazardous wastes, the Emergency Coordinator will perform the necessary actions to insure a timely and appropriate response. The emergency coordinator shall choose the order and applicability of the following actions based upon the situation and the hazardous materials involved.

I. Identify and assess the situation with respect to source, health, area affected, and environmental impact.

II. Activate the appropriate level of alarm to notify all affected company personnel and contractors.

III. Evacuate the area or building as outlined in the emergency evacuation plan if necessary.

IV. Determine action to be taken and resources required. This may include containment and/or absorption.

V. Oversee the cleanup throughout its entirety

In the event of a spill of hazardous waste which presents risk of injury to health or environment or during an emergency where the facility must implement its contingency plan, the emergency coordinator must also notify the TPI Corporate EHS Engineer who will assume responsibility for making any subsequently necessary notifications (including reports) to the appropriate regulatory authorities The Corporate EHS Engineer will need the following information:

I. Date, time, and type of incident

II. Material and quantity involved

III. Extent of injuries, if any

IV. Assessment of actual or potential hazards to human health or the environment, if applicable

V. Estimated quantity and disposition of recovered material that resulted from the incident

*Note: Keep in mind that absorbent materials like speedy dry and rags (even with minor contamination) must be considered as hazardous waste and must be handled in accordance with our normal hazardous waste handling procedures.*

**5. Emergency Equipment:**

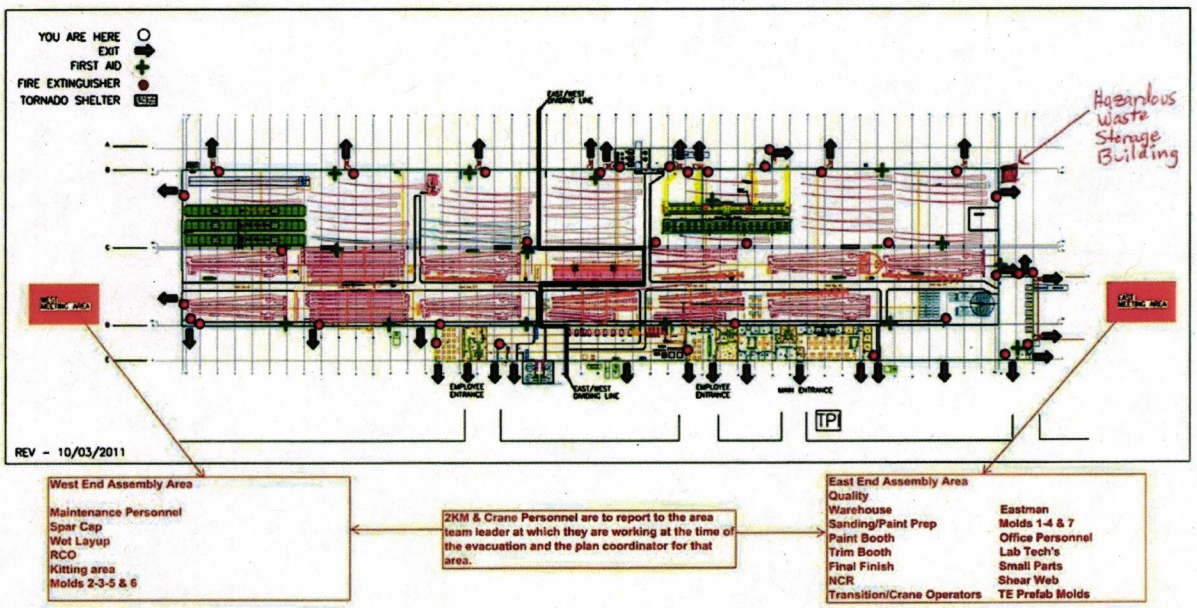
The following equipment must always be on site and in operating condition:

I. Alarm System
II. Phone System
III. Mobile telephones
IV. Fire Extinguishers-ABC type fire extinguishers are located throughout the plant
V. Sprinkler Systems-located throughout the building
VI. Spill Control Kits-Located in close proximity to satellite accumulation stations these kits are made up of speedy dry, a shovel and a bucket
VII. Personnel Protection Equipment-This includes respirators, dust masks, gloves and tyvek suits
VIII. Exit Signs with emergency backup power.

**6.Evacuation Routes:**

In the event an emergency arises involving hazardous materials which requires the evacuation of the building, the alarm will sound. All employees, contractors and visitors must exit the building through the nearest exit as outlined in the Emergency Action Plan (EHS 003). Once outside the building, all employees should group at their designated evacuation assembly area and wait for further instruction.

# Emergency Evacuation




## 8. Arrangements

The Newton Fire Department acts as our primary emergency response team as well as the Newton Police Department. Each department will be provided with a current copy of this plan.

### *Revision History*

| Prepared By | Rev | Date | Reason for Change |
|---|---|---|---|
| Craig Althof | A | 5/10/2012 | Initial issue |

May 11, 2012

Newton Fire Department
410 S 2nd Ave W.
Newton, IA 50208

Re: Large Quantity Hazardous Waste Generation Activity.

To whom it may concern:

Please be advised that TPI Iowa LLC is a large quantity generator (greater than 1,000 kg/month) of hazardous waste, which is accumulated up to 90 days before being collected by an authorized transporter. Hazardous wastes predominantly consist of spent acetone and spent paint related materials. Both of these wastes are considered flammable liquids.

TPI's hazardous wastes are collected and stored in 55 gallon steel drums. Full drums are kept in our hazardous waste storage building, which is situated outside of the northeast corner of our building location at 2300 N 33rd Avenue area. The maximum capacity of our hazardous waste storage building is 10 drums.

Material Safety Data Sheets for the original materials are enclosed. Fire and health risks from the used material are expected to be similar to that of the original material. Additionally, a copy of our Hazardous Waste Emergency Contingency Plan (ECP) is enclosed for your reference.

If you have any questions regarding this information, or TPI's operations, please do not hesitate to contact me at 641-831-4795

Sincerely,

Jim Bailey
EHS Coordinator

Cc: Mark Parriott
Newton Police Department

Enclosures: Acetone and Barsol A4212 MSDS, TPI Hazardous Waste Emergency Contingency Plan

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Newton Fire Dept.
410 S. 2nd Ave W.
Newton, IA
50208

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature
X Shirley Morton
☐ Agent
☐ Addressee

B. Received by (Printed Name)
Shirley Morton

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service) 7011 2970 0003 0503 6185

PS Form 3811, Febr... 02595-02-M-1540

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| Return Receipt Fee (Endorsement Required) | $2.95 |
| Restricted Delivery Fee (Endorsement Required) | |
| Total Postage & Fees | $ $0.00 |

NEWTON, IA 50208-9998 MAY 21 2012

0708

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Sent To
Newton Fire Dept.
Street, Apt. No., or PO Box No.
City, State, ZIP+4

05/11/2012

PS Form 3800, August 2006 See Reverse for Instructions

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NEWTON IA 50208

| | |
|---|---|
| Postage | $ |
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| Return Receipt Fee (Endorsement Required) | $2.95 |
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MAY 21 2012
0708
Postmark Here

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AWMD / WEMM
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Cc: "Parriott, Mark" <MParriott@tpicomposites.com>, "Bailey, Jim" <JBailey@tpicomposites.com>
Date: 05/17/2012 04:44 PM
Subject: TPI Iowa LLC - IAR000510156 - RCRA Compliance Evaluation Inspection

Mr. Witkovski – I apologize for the peace-meal fashion of this response, but not knowing when you will be finalizing your report I think it best to update you with information as soon as it becomes available.

This message contains information to address NOPF #'s 14 and 15, as well as an update on actions being taken to address NOPF #'s 1-6 and 13.

NOPF #14--Failure to perform an adequate hazardous waste determination for paint related waste [40 CFR 262.11]. Specifically, this issue involved the waste codes on the manifests and LDRs for our waste paint related materials.

We have determined the root cause of this matter to be the use of an incorrect hazardous waste profile. TPI has two hazardous waste profiles assigned to our painting process. The first profile is for waste paint and the second is for a mixture of (the same) paint and a paint clean-up solvents. We primarily generate the second profile (which carries additional EPA waste codes). We are presently not generating either of these waste profiles and both are actively being re-profiled to assure that they are technically accurate before any further manifesting. Additionally, all of TPI's other hazardous waste profiles are being reviewed and updated for accuracy. A copy of our current profile list is attached as evidence of our two paint waste profiles.

NOPF #15: Failure to have used oil removed by a transporter that has obtained an EPA ID Number [40 CFR 279.24]. This issue involved the offering of used oil generated on site for off-site transportation and recycling.

After internal review, it has been determined that the contractor who provides on-site preventive maintenance service of our forklifts takes the used oil (motor) collected from the forklifts back to their shop for recycling – as part of their service. Effective immediately, all such used oil shall be kept and accumulated on-site by TPI, and sent for off-site disposal/recycling using an appropriately licensed used oil transportation/recycling contractor(s).

NOPF #'s 1-6: Our principal tactic for complying with the named regulatory references will begin with the creation of a single, designated hazardous waste storage area. Concurrently, we are auditing our satellite accumulation activities and making necessary process and equipment changes to ensure compliance with all applicable satellite accumulation requirements (and to ensure that satellite accumulation does not become hazardous waste storage).

NOPF #13: Historically, hazardous waste training has included TPI EHS, Warehouse, and Shipping and Receiving employees. As we are addressing NOPF #'s 1-6, we are expanding our hazardous waste training program to include all TPI employees who will be assigned with, or are expected to have hazardous waste responsibilities. To the extent possible, however, our goal is to minimize the number of employees who will have hazardous waste responsibilities.

Work will continue on the NOPFS and I will provide my next update as aforementioned actions are completed. Otherwise, if you have any immediate questions please do not hesitate to contact me.

Thank you, Dave Lloyd

Dave Lloyd, CSP
Corporate EHS Engineer
TPI Composites, Inc.
Office: 401-247-4096
Mobile: 401-578-8964
Fax: 401-247-2669

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**Sent:** Monday, April 30, 2012 3:08 PM
**To:** 'witkovski.gary@epa.gov'
**Cc:** Nelles, Clifford [USA] (ASE) (nelles_clifford@bah.com); Parriott, Mark; Bailey, Jim
**Subject:** TPI Iowa LLC - IAR000510156 - RCRA Compliance Evaluation Inspection

Mr. Witkovski – I am contacting you in response to a RCRA Compliance Evaluation inspection that occurred at our Newton, IA facility on April 18, 2012. The inspection was conducted by Clifford Nelles of ASE Inc. Mr. Nelles concluded his inspection by providing an explanation of each of his findings, which were documented on a Notice of Preliminary Findings form (of which he provided a copy to TPI).

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1. Satellite accumulation and storage areas
2. Emergency contingency planning
3. Employee training

We anticipate receiving Mr. Nelles' inspection report in the coming weeks and will formally respond to the report as instructed. In the meantime, please do not hesitate to contact me if you require any additional information.

Thank you,

Dave Lloyd, CSP
Corporate EHS Engineer
TPI Composites, Inc.
Office: 401-247-4096
Mobile: 401-578-8964
Fax: 401-247-2669

3990_001.pdf

# Customer Data Sheet

COMPANY **203169**

Company TPI
2300 N 33rd Ave E/ PO Box 847
Newton IA 50208

EPA_ID IAR000510156

Contact

Contact Phone
Contact Fax

EMERGENCY PHONE

CHEMTREC 2009

Pricesheet

| PROFILE | PROCESS | COMMON NAME | WASTE CODE | DOTDESC |
|---|---|---|---|---|
| 2009020145 | 1RA511 | ACETONE | F003 D001 U002 | Waste Acetone, 3, UN1090, PGII RQ-F003, D001 |
| 2009030121 | 7WD102 | WASTE RAGS W/ACETONE | F003 D001 | Waste Solids containing flammable liquid, n.o.s. (Acetone), 4.1, UN3175, PGII RQ-D001, F003 |
| 2009060214 | 1RA507 | NMP | NREG | Non-RCRA hazardous waste liquid (N-Methyl-2-Pyrrolidone) |
| 2009060215 | 1CA221 | DIBASIC ESTER | NREG | Non-RCRA hazardous waste liquid (Dibasic Ester) |
| 2009060263 | 1RA517 | PAINT CLEANUP/ACETONE | F005 F003 D001 D035 | Waste Paint related material, 3, UN1263, PGII RQ-F005, F003, D001 |
| 2009110001 | 5WA008 | ACETONE CLEANUP W/PADS | F003 D001 | Waste Solids containing flammable liquid, n.o.s. (Acetone), 4.1, UN3175, PGII RQ-F003, D001 |
| 2009110111 | 5WD242 | EPIKURE CURINE HARDENEI | NREG | Amines, solid, corrosive, n.o.s. (Alkylethermine, Isophoronediamine), 8, UN3259, PGII |
| 2009120087 | 1ON249 | USED HYDRAULIC OIL | NREG | Non-RCRA hazardous waste liquid (Oil) |
| 2009120088 | EWA259 | EPIKOT RESIN MGS RIMR 13 | NREG | Non-RCRA hazardous waste liquid (Resin) |
| 2010020001 | 5WA120 | 3M DRY LAYUP ADHESIVE (P. | D001 | Waste Adhesives, 3 , UN1133, PGII RQ-D001 |
| 2010030025 | 1RA582 | IPA 99% | D001 | Waste Isopropanol, 3 , UN1219 PG,II RQ-D001 |
| 2010030070 | 1RA507 | THERMACLEAN #1 | | |
| 2010030071 | 1RA507 | THERMACLEAN #2 | F003 D001 | Waste Flammable liquids, n.o.s. (Acetone, Methanol), 3 , UN1993, PGII RQ-F003, D001 |
| 2010030072 | 1RA507 | THERMACLEAN #3 | NREG | Non-RCRA hazardous waste liquid (Dibasic Esters) |
| 2011110003 | EWD259 | ALEXIT 491-21 & ALEXIT 491- | NREG | Non-RCRA hazardous waste solid (Paint Coating) |
| 2011110004 | 1FB221 | PAINT | D001 | Waste Paint related material, 3 , UN1263, PGII RQ-D001 |
| 2011110005 | 5WD242 | AIRSTONE XHEX9018 | NREG | Amines, solid, corrosive, n.o.s. (Poly(oxypropylene) Diamine), 8, UN3259, PGIII |
| 2011110006 | RWD250 | CHEMLEASE 1367/41-90EZ RI | D001 | Waste Solids containing flammable liquid, n.o.s. (Polyester Resin), 4.1, UN3175, PGII RQ-D001 |
| 2011110007 | RWD250 | POLYTITE TLP 33234-24 RESI | D001 | Waste Solids containing flammable liquid, n.o.s. (Polyester Resin), 4.1, UN3175, PGII RQ-D001 |

# Customer Data Sheet

| PROFILE | PROCESS | COMMON_NAME | WASTE_CODE | DOTDESC |
|---|---|---|---|---|
| 2011110008 | EWD259 | ALEXIT 495-22/ALEXIT 495-21 | NREG | Non-RCRA hazardous waste solid (Diphenylmethane 4-4-Diisocyanate, Isomeres, Homologues) |
| 2011110161 | RWD250 | 47725/SPABOND 349 /RESIN | NREG | Environmentally hazardous substances, solid, n.o.s (Bisphenol-A-(epichlorhyrin) epoxy resin), 9, UN3077, PGIII |
| 2011110163 | EWA259 | 47242/ I 3850013 POLYISOCY, | NREG | Non DOT/EPA Regulated Waste Liquid (Aliphatic Poluisocyanate) |
| 2011110164 | EWA359 | 47241/I 37200023220 SILICA | NREG | Non DOT/EPA Regulated Liquids (Solvent-Free Polyurethane Coating) |
| 2012010064 | 5WA118 | AIRSTONE 780E RESIN | NREG | Environmentally hazardous substances, liquid, n.o.s. (Epoxy Resin), 9, UN3082, PGIII |
| 2012030308 | 1HE804 | WASTE WATER | NREG | Non-RCRA hazardous waste liquid (Waste Water) |

**TPI Iowa LLC - IAR000510156 - RCRA Compliance Evaluation Inspection**

Lloyd, David to: Deborah Bredehoft 06/19/2012 09:22 AM

Cc: Gary Witkovski, "Parriott, Mark", "Bailey, Jim"

5 attachments

3990_001.pdf EHS 010 Hazardous Waste Management and Disposal Plan - Copy.docx

EHS-011 Hazardous Waste Contingency Plan - Copy.docxLQG notification and ECP Letter - NFD.pdf

LQG notification and ECP Letter - NPD.pdf

Ms. Bredehoft – I am contacting you to confirm receipt of the inspection report that was issued to TPI in association with the above referenced CEI. I also wanted to take this opportunity to share previous correspondences that I have made to Mr. Gary Witkovski that detail actions undertaken by TPI to address Notices of Preliminary Findings (NOPFs) that were brought to our attention at the close of the CEI. We continue to make progress on all NOPFs and expect to have them all completely closed within 30 days.

If you have any immediate questions please do not hesitate to contact me.

Thank you – Dave Lloyd

Dave Lloyd, CSP
Corporate EHS Engineer
TPI Composites, Inc.
Office: 401-247-4096
Mobile: 401-578-8964
Fax: 401-247-2669

----- Message from "Lloyd, David" <DLloyd@tpicomposites.com> on Thu, 17 May 2012 17:44:50 -0400 -----

To: "Gary Witkovski" <Witkovski.Gary@epamail.epa.gov>

cc: "Parriott, Mark" <MParriott@tpicomposites.com>, "Bailey, Jim" <JBailey@tpicomposites.com>

Subject: TPI Iowa LLC - IAR000510156 - RCRA Compliance Evaluation Inspection

Mr. Witkovski - I apologize for the peace-meal fashion of this response, but not knowing when you will be finalizing your report I think it best to update you with information as soon as it becomes available.

This message contains information to address NOPF #'s 14 and 15, as well as an update on actions being taken to address NOPF #'s 1-6 and 13.

NOPF #14--Failure to perform an adequate hazardous waste determination for paint related waste [40 CFR 262.11]. Specifically, this issue involved the waste codes on the manifests and LDRs for our waste paint related materials.

We have determined the root cause of this matter to be the use of an incorrect hazardous waste profile. TPI has two hazardous waste profiles assigned to our painting process. The first profile is for waste paint and the second is for a mixture of (the same) paint and a paint clean-up solvents. We primarily generate the second profile (which carries additional EPA waste codes). We are presently not generating either of these waste profiles and both are actively being re-profiled to assure that they are technically accurate before any further manifesting. Additionally, all of TPI's other hazardous waste profiles are being reviewed and updated for accuracy. A copy of our current profile list is attached as evidence of our two paint waste profiles.

NOPF #15: Failure to have used oil removed by a transporter that has obtained an EPA ID Number [40 CFR 279.24]. This issue involved the offering of used oil generated on site for off-site transportation and recycling.

After internal review, it has been determined that the contractor who provides on-site preventive maintenance service of our forklifts takes the used oil (motor) collected from the forklifts back to their shop for recycling - as part of their service. Effective immediately, all such used oil shall be kept and accumulated on-site by TPI, and sent for off-site disposal/recycling using an appropriately licensed used oil transportation/recycling contractor(s).

NOPF #'s 1-6: Our principal tactic for complying with the named regulatory references will begin with the creation of a single, designated hazardous waste storage area. Concurrently, we are auditing our satellite accumulation activities and making necessary process and equipment changes to ensure compliance with all applicable satellite accumulation requirements (and to ensure that satellite accumulation does not become hazardous waste storage).

NOPF #13: Historically, hazardous waste training has included TPI EHS, Warehouse, and Shipping and Receiving employees. As we are addressing NOPF #'s 1-6, we are expanding our hazardous waste training program to include all TPI employees who will be assigned with, or are expected to have hazardous waste responsibilities. To the extent possible, however, our goal is to minimize the number of employees who will have hazardous waste responsibilities.

Work will continue on the NOPFS and I will provide my next update as aforementioned actions are completed. Otherwise, if you have any immediate questions please do not hesitate to contact me.

Thank you, Dave Lloyd

Dave Lloyd, CSP
Corporate EHS Engineer
TPI Composites, Inc.
Office: 401-247-4096
Mobile: 401-578-8964
Fax: 401-247-2669

From: Lloyd, David
Sent: Wednesday, May 16, 2012 10:59 AM
To: 'Gary Witkovski'
Subject: RE: TPI Iowa LLC - IAR000510156 - RCRA Compliance Evaluation Inspection

Thank you.

I am attaching information that addresses NPOF #'s 7-12 listed on Cliff Nelles handwritten NOPF form, dated 4/18/2012. This information consists of TPI's updated Hazardous Waste Emergency Contingency

Plan (ECP) and proof of submission to/receipt by local emergency response authorities. I have also included an updated copy of our written Hazardous Waste Management and Disposal Plan which is being used as the basis to address NOPF #'s 1-6 and 13. Work continues on NOPF #'s 1-6 and 13-15 and more detailed information will be forthcoming.

If you have any immediate questions please do not hesitate to contact me.

Thank you, Dave Lloyd

Dave Lloyd, CSP
Corporate EHS Engineer
TPI Composites, Inc.
Office: 401-247-4096
Mobile: 401-578-8964
Fax: 401-247-2669

From: Gary Witkovski [mailto:Witkovski.Gary@epamail.epa.gov]
Sent: Wednesday, May 16, 2012 10:18 AM
To: Lloyd, David
Subject: RE: TPI Iowa LLC - IAR000510156 - RCRA Compliance Evaluation Inspection

I request to you respond to the NOPF as soon as possible. That way I can include your response when I finalize the report. If you have any additional questions, please contact men.

"Lloyd, David" ---05/16/2012 09:29:30 AM---Mr. Witkovski - we have begun to complete actions taken in response to the above referenced inspecti

From: "Lloyd, David" <DLloyd@tpicomposites.com>
To: Gary Witkovski/R7/USEPA/US@EPA
Cc: <nelles_clifford@bah.com>
Date: 05/16/2012 09:29 AM
Subject: RE: TPI Iowa LLC - IAR000510156 - RCRA Compliance Evaluation Inspection

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Thank you - Dave Lloyd

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Cc: Nelles, Clifford [USA] (ASE) (nelles_clifford@bah.com); Parriott, Mark; Bailey, Jim
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----- Message from "Lloyd, David" <DLloyd@tpicomposites.com> on Wed, 16 May 2012 11:58:48 -0400 -----

To: "Gary Witkovski" <Witkovski.Gary@epamail.epa.gov>
Subject RE: TPI Iowa LLC - IAR000510156 - RCRA Compliance Evaluation
: Inspection

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# Customer Data Sheet

COMPANY **203169**

Company TPI
2300 N 33rd Ave E/ PO Box 847
Newton IA 50208

EPA_ID IAR000510156

Contact

Contact Phone
Contact Fax

EMERGENCY PHONE

CHEMTREC 2009

Pricesheet

| PROFILE | PROCESS | COMMON NAME | WASTE CODE | DOTDESC |
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| 2009120087 | 1ON249 | USED HYDRAULIC OIL | NREG | Non-RCRA hazardous waste liquid (Oil) |
| 2009120088 | EWA259 | EPIKOT RESIN MGS RIMR 13 | NREG | Non-RCRA hazardous waste liquid (Resin) |
| 2010020001 | 5WA120 | 3M DRY LAYUP ADHESIVE (P. | D001 | Waste Adhesives, 3 , UN1133, PGII RQ-D001 |
| 2010030025 | 1RA582 | IPA 99% | D001 | Waste Isopropanol, 3 , UN1219 PG,II RQ-D001 |
| 2010030070 | 1RA507 | THERMACLEAN #1 | | |
| 2010030071 | 1RA507 | THERMACLEAN #2 | F003 D001 | Waste Flammable liquids, n.o.s. (Acetone, Methanol), 3 , UN1993, PGII RQ-F003, D001 |
| 2010030072 | 1RA507 | THERMACLEAN #3 | NREG | Non-RCRA hazardous waste liquid (Dibasic Esters) |
| 2011110003 | EWD259 | ALEXIT 491-21 & ALEXIT 491- | NREG | Non-RCRA hazardous waste solid (Paint Coating) |
| 2011110004 | 1FB221 | PAINT | D001 | Waste Paint related material, 3 , UN1263, PGII RQ-D001 |
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| 2011110006 | RWD250 | CHEMLEASE 1367/41-90EZ RI | D001 | Waste Solids containing flammable liquid, n.o.s. (Polyester Resin), 4.1, UN3175, PGII RQ-D001 |
| 2011110007 | RWD250 | POLYTITE TLP 33234-24 RESI | D001 | Waste Solids containing flammable liquid, n.o.s. (Polyester Resin), 4.1, UN3175, PGII RQ-D001 |

# Customer Data Sheet

| PROFILE | PROCESS | COMMON_NAME | WASTE_CODE | DOTDESC |
|---|---|---|---|---|
| 2011110008 | EWD259 | ALEXIT 495-22/ALEXIT 495-21 | NREG | Non-RCRA hazardous waste solid (Diphenylmethane 4-4-Diisocyanate, Isomeres, Homologues) |
| 2011110161 | RWD250 | 47725/SPABOND 349 /RESIN | NREG | Environmentally hazardous substances, solid, n.o.s (Bisphenol-A-(epichlorhyrin) epoxy resin), 9, UN3077, PGIII |
| 2011110163 | EWA259 | 47242/ I 3850013 POLYISOCY, | NREG | Non DOT/EPA Regulated Waste Liquid (Aliphatic Poluisocyanate) |
| 2011110164 | EWA359 | 47241/I 37200023220 SILICA | NREG | Non DOT/EPA Regulated Liquids (Solvent-Free Polyurethane Coating) |
| 2012010064 | 5WA118 | AIRSTONE 780E RESIN | NREG | Environmentally hazardous substances, liquid, n.o.s. (Epoxy Resin), 9, UN3082, PGIII |
| 2012030308 | 1HE804 | WASTE WATER | NREG | Non-RCRA hazardous waste liquid (Waste Water) |

**1. Overview**

In the course of business, TPI Iowa LLC (TPI) generates hazardous wastes. TPI has developed these instructions to meet the requirements of OSHA 40 CFR 260 to 265.

**2. Hazardous Waste Management**

Materials are considered to be Hazardous Waste if they meet any of the following criteria:

I. They are listed by the U.S. Environmental Protection Agency in 40 CFR 261 Subpart D (a listed waste). (Note that some wastes are defined as "acutely hazardous waste" and therefore the quantity which can be temporarily stored on-site is limited. Section 2.2 provides more information).

II. They demonstrate ignitability, corrosively, reactivity, or toxicity as outlined in 40 CFR 261 Subpart C (a characteristic waste).

TPI's predominantly generated hazardous waste types are flammable liquids and flammable solids. A listing of TPI's routinely generated hazardous waste profiles are listed in Appendix A.

**3. Handling Flammable Hazardous Wastes**

Hazardous waste flammable liquids and solids are generated primarily from cleaning tools and equipment that comes in contact with paint and epoxy resin. These wastes are collected at or close to the point of generation in satellite accumulation containers . Employees are responsible for placing hazardous flammable wastes they generate into the proper satellite hazardous waste collection container.

When a satelliteaccumulation drum is full a Warehouse employee is contacted. The warehouse employee is responsible for closing (including labeling and dating) and immediately transferring the full drum to the plant's Hazardous Waste Storage area. The warehouse employee is also responsible for providing a properly prepared, empty satellite accumulation drum.

**4. Hazardous Waste Storage Area**

Hazardous waste is stored in a fire rated chemical storage building which is located outsideofthe northeast corner of the building. The storage building has a maximum storage capacity of 10 drums, is equipped with adequate secondary containment, a portable fire extinguisher, and spill cleanup materials. The building is kept locked and is only accessible by Warehouse employees.

**5. Time Limits**

TPI may keep hazardous wastes on site for no more than 90 days. However, the actual maximum amount of time hazardous waste is stored on site is typical less than 14 days.

**6. Labeling Requirements**

Each container must be labeled with the following information:

I. The words: "Hazardous Waste – Federal Law prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the US Environmental Protection Agency"
II. TPI's EPA Waste Number. **IAR005510156**
III. DOT proper shipping name.
IV. DOT Hazard Label.
V. Our Name and address: **TPI Iowa LLC.**
**2300 N 33rd Avenue**
**Newton, IA 50208**

Preprinted hazardous waste drum labels (containing all of the above information) are provided by hazardous waste disposal contractor for each type of hazardous waste generated by TPI.

**7. Weekly Inspections**

The Warehouse staff is responsible for inspecting the hazardous waste storage area every week. An inspection form has been set up and is located on a clipboard inside the hazardous waste storage building.

The inspection will include:

I. Inspector's initials
II. Time/date of inspection
III. Number of drums in storage
IV. Ensure drums are properly closed
V. Ensure no signs of leakage
VI. Confirm area is dry
VII. Note if there is evidence of spill and action taken to clean it up
VIII. Confirm proper labeling on drums, including an accumulation start date. Ensure labels are no further apart than 3 inches and are always visible for inspection.

Any issues should be addressed immediately and noted or reported to the EHS Coordinator. All completed forms are maintained by the Warehouse Supervisor.

**8. Shipping Hazardous Waste**

Hazardous waste may not be stored on site for a period of more than 90 days (beginning when the waste is placed in the hazardous waste storage area). The following are instructions on how to make arrangements to ship our hazardous waste. (Note: Only an employee trained to ship hazardous materials may do so):

I. Contact the Purchasing Department to schedule a pickup.
   a. If you have an unusual, one-time waste, contact the hazardous waste disposal contractor to obtain pre-approval prior to pick-up.
II. When the truck arrives, stand by and observe as all drums are loaded.
III. The driver will have new labels with him which he will place over our labels. These labels have more detailed information than ours about shipping names and UN numbers. They will also have a reference to the manifest number on each label, check that this is correct.
IV. Check the USEPA ID number and make sure that is correct – TPI's USEPA ID number is **IAR005510156**

V. Once the shipment is loaded, you will need to go over the paperwork with the driver. He will have two or three different forms – hazardous waste manifest, non-hazardous waste manifest and/or land ban restriction forms.

VI. Review the forms to ensure the information is correct before you sign.

VII. Once the paperwork is complete, ask the driver to placard the truck. This is the generator's (TPI's) responsibility under the law. Most of what we ship is flammable, so he should turn the placards on all four sides of his truck to the red number 3 flammable sign before he drives off. Watch him until he has left our property.

VIII. Forward the signed copies of all the paperwork to the EHS Coordinator

a. Maintain the paperwork in the Hazardous Waste Manifest file.

b. The disposal facility will mail a signed copy of the manifest back to TPI within 45 days. This manifest shall be filed in the Hazardous Waste Manifest file by the EHS Coordinator.

**9. Record Keeping**

Hazardous waste records will be kept indefinitely.

**10. Reporting**

Annual hazardous waste data is required to be submitted to EPA Region 7 on a biennial basis for odd numbered years.

**11. Training**

An annual review will be conducted for all employees involved in handling or overseeing the disposal of hazardous wastes.

**12. Hazardous Waste Minimization**

TPI continues to explore methods and make efforts to reduce the volume and toxicity of hazardous waste generated to the degree which has been determined to be economically practicable. We have also selected the most practicable methods of treatment, storage, or disposal currently available to us which minimize the present and future threat to human health and the environment.

**Appendix A**
**Currently Approved Hazardous Waste Profiles**

| Waste Description | EPA Waste Code(s) | Hazard Class |
|---|---|---|
| Acetone | F003, D001 | Flammable Liquid |
| Paint related materials | D001, D035, F003, F005 | Flammable Liquid |
| Solvent contaminated rags | D001, F003 | Flammable Solid |
| Epoxy Hardener | D002 | Corrosive |
| Misc. Flammable Liquids | D001 | Flammable Liquids |

## *Revision History*

| Prepared By | Rev | Date | Reason for Change |
|---|---|---|---|
| Craig Althof | A | 5/10/2012 | Initial issue of document |

## 1. Overview

Large Quantity Generators of hazardous waste are required to prepare a formal written plan outlining specific steps that company personnel will take in response to spills, fires, and explosions or any unplanned release involving hazardous wastes which could threaten health or the environment. This document outlines TPI Iowa LLC Inc.'s (TPI) hazardous waste contingency plan.

## 2. Hazardous Waste

TPI presently generates over 6 different types of hazardous waste, 3 of which constitute more than 90% of TPI's total hazardous waste. These hazardous wastes are:

1. Waste paint related materials (flammable liquids)
2. Waste acetone (flammable liquids)
3. Waste solvent contaminated solid materials (e.g., acetone rags – flammable solids)

Hazardous waste is accumulated in satellite hazardous waste accumulation containers (55 gallon steel drums) stationed throughout the plant. Containers accumulating hazardous wastes that are characterized as flammable liquid (e.g., paint related materials and acetone) are individually stored in flammable liquid storage cabinets. Hazardous waste (full accumulation containers) is stored in a fire rated chemical storage building that is located outside of the northeast corner of the building. This building has a storage capacity of 10 drums, has a secondary containment in excess of 75 gallons, and is equipped with a portable fire extinguisher and spill containment materials. Hazardous waste storage is limited to 90 days, but is typically stored for a maximum of 14 days due to the availability of weekly hazardous waste pick-ups. The hazardous waste storage building is kept locked and is only accessible by authorized employees.

## 3. Emergency Coordinators

The emergency coordinators listed below are authorized to act as on-scene coordinators and to commit the necessary resources during an emergency. Actions taken by the emergency coordinator may include stopping processes and operations, collecting and containing waste, as well as removing or isolating containers. There shall always be at least one coordinator (primary or alternate) either on the company premises or on-call.

Emergency coordinators must be familiar with all aspects of the contingency plan, all operations and activities at the company, the locations and characteristics of wastes handled and stored, the location of all environmental records, and the physical layout of the company.

Emergency coordinators must be prepared to act quickly to protect employees while taking reasonable measures to ensure that fires, explosions, and/or releases do not occur, recur, or spread to other areas in the building. These measures shall include stopping processes and operations, collecting and containing released waste and removing or isolating containers.

The Emergency Coordinators at TPI Iowa LLC are:

| Primary Coordinator | Address | Home Phone | Mobile Phone |
|---|---|---|---|
| Jim Bailey | [redacted] | [redacted] | [redacted] Ex. 6 PII |

| Alternate Coordinator | Address | Home Phone | Mobile Phone |
|---|---|---|---|
| Rich Myers | [redacted] | [redacted] | [redacted] Ex. 6 PII |

***To report a serious emergency requiring local police, fire, or medical support,*** **Dial 8 and then 911**

A dispatcher will answer your call. Describe the nature of the emergency and the location in the facility (front, back, right side, or left side of the building). When the emergency crew arrive, someone should meet them outside the building and direct them where needed.

**4. Emergency Procedures**

During an emergency involving hazardous wastes, the Emergency Coordinator will perform the necessary actions to insure a timely and appropriate response. The emergency coordinator shall choose the order and applicability of the following actions based upon the situation and the hazardous materials involved.

I. Identify and assess the situation with respect to source, health, area affected, and environmental impact.

II. Activate the appropriate level of alarm to notify all affected company personnel and contractors.

III. Evacuate the area or building as outlined in the emergency evacuation plan if necessary.

IV. Determine action to be taken and resources required. This may include containment and/or absorption.

V. Oversee the cleanup throughout its entirety

In the event of a spill of hazardous waste which presents risk of injury to health or environment or during an emergency where the facility must implement its contingency plan, the emergency coordinator must also notify the TPI Corporate EHS Engineer who will assume responsibility for making any subsequently necessary notifications (including reports) to the appropriate regulatory authorities The Corporate EHS Engineer will need the following information:

I. Date, time, and type of incident

II. Material and quantity involved

III. Extent of injuries, if any

IV. Assessment of actual or potential hazards to human health or the environment, if applicable

V. Estimated quantity and disposition of recovered material that resulted from the incident

*Note: Keep in mind that absorbent materials like speedy dry and rags (even with minor contamination) must be considered as hazardous waste and must be handled in accordance with our normal hazardous waste handling procedures.*

**5. Emergency Equipment:**

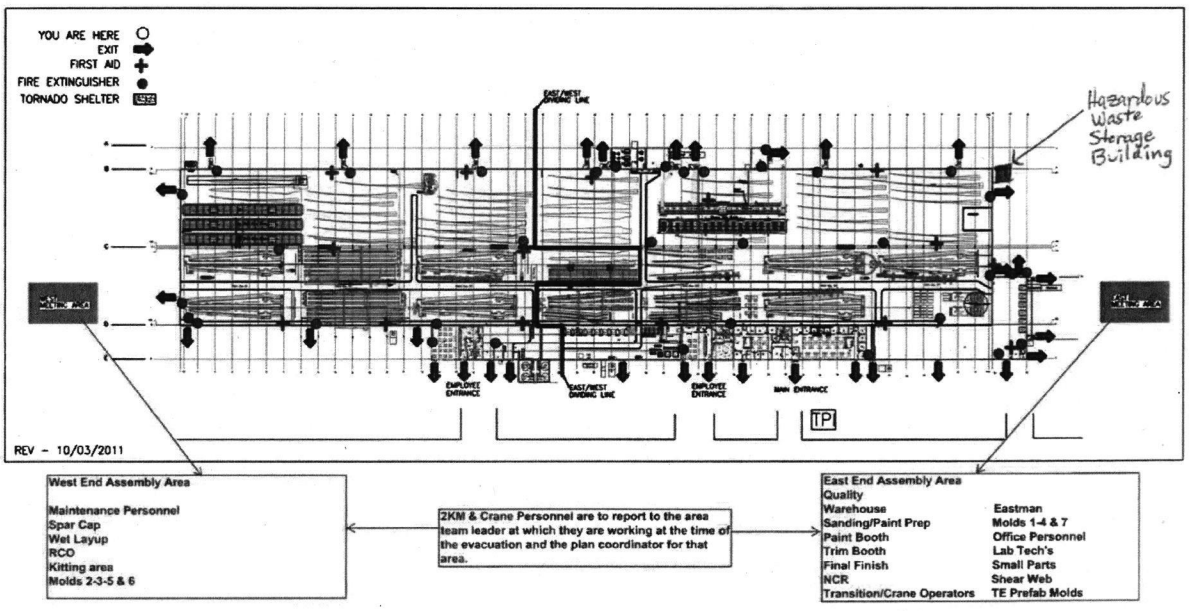
The following equipment must always be on site and in operating condition:

I. Alarm System
II. Phone System
III. Mobile telephones
IV. Fire Extinguishers-ABC type fire extinguishers are located throughout the plant
V. Sprinkler Systems-located throughout the building
VI. Spill Control Kits-Located in close proximity to satellite accumulation stations these kits are made up of speedy dry, a shovel and a bucket
VII. Personnel Protection Equipment-This includes respirators, dust masks, gloves and tyvek suits
VIII. Exit Signs with emergency backup power.

**6.Evacuation Routes:**

In the event an emergency arises involving hazardous materials which requires the evacuation of the building, the alarm will sound. All employees, contractors and visitors must exit the building through the nearest exit as outlined in the Emergency Action Plan (EHS 003). Once outside the building, all employees should group at their designated evacuation assembly area and wait for further instruction.

# Emergency Evacuation




**West End Assembly Area**

Maintenance Personnel
Spar Cap
Wet Layup
RCO
Kitting area
Molds 2-3-5 & 6

2KM & Crane Personnel are to report to the area team leader at which they are working at the time of the evacuation and the plan coordinator for that area.

**East End Assembly Area**

Quality
Warehouse
Sanding/Paint Prep
Paint Booth
Trim Booth
Final Finish
NCR
Transition/Crane Operators

Eastman
Molds 1-4 & 7
Office Personnel
Lab Tech's
Small Parts
Shear Web
TE Prefab Molds

## 8. Arrangements

The Newton Fire Department acts as our primary emergency response team as well as the Newton Police Department. Each department will be provided with a current copy of this plan.

### *Revision History*

| Prepared By | Rev | Date | Reason for Change |
|---|---|---|---|
| Craig Althof | A | 5/10/2012 | Initial issue |

DELIVERING
COMPOSITE
SOLUTIONS

May 11, 2012

Newton Fire Department
410 S 2nd Ave W.
Newton, IA 50208

Re: Large Quantity Hazardous Waste Generation Activity.

To whom it may concern:

Please be advised that TPI Iowa LLC is a large quantity generator (greater than 1,000 kg/month) of hazardous waste, which is accumulated up to 90 days before being collected by an authorized transporter. Hazardous wastes predominantly consist of spent acetone and spent paint related materials. Both of these wastes are considered flammable liquids.

TPI's hazardous wastes are collected and stored in 55 gallon steel drums. Full drums are kept in our hazardous waste storage building, which is situated outside of the northeast corner of our building location at 2300 N 33rd Avenue area. The maximum capacity of our hazardous waste storage building is 10 drums.

Material Safety Data Sheets for the original materials are enclosed. Fire and health risks from the used material are expected to be similar to that of the original material. Additionally, a copy of our Hazardous Waste Emergency Contingency Plan (ECP) is enclosed for your reference.

If you have any questions regarding this information, or TPI's operations, please do not hesitate to contact me at 641-831-4795

Sincerely,

Jim Bailey
EHS Coordinator

Cc: Mark Parriott
Newton Police Department

Enclosures: Acetone and Barsol A4212 MSDS, TPI Hazardous Waste Emergency Contingency Plan

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Newton Fire Dept.
410 S. 2nd Ave W.
Newton, IA
50208

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature
X Shirley Morton
☐ Agent
☐ Addressee

B. Received by (Printed Name)
Shirley Morton

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7011 2970 0003 0503 6185

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Street, Apt. No.; or PO Box No.

City, State, ZIP+4

PS Form 3800, August 2006 See Reverse for Instructions

DELIVERING
COMPOSITE
SOLUTIONS

May 11, 2012

Newton Police Department
101 W 4th St S.
Newton, IA 50208

Re: Large Quantity Hazardous Waste Generation Activity.

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Sincerely,

Jim Bailey
EHS Coordinator

Cc: Mark Parriott
Newton Fire Department

Enclosures: Acetone and Barsol A4212 MSDS, TPI Hazardous Waste Emergency Contingency Plan

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Newton Police Dept.
101 W. 4th St S,
Newton, IA 50208

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature
X Robin Smith
☐ Agent
☐ Addressee

B. Received by (Printed Name) Robin Smith
C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☒ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7011 2970 0003 0503 6178

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| Return Receipt Fee (Endorsement Required) | MAY 21 2012 | |
| Restricted Delivery Fee (Endorsement Required) | $0.00 | |
| Total Postage & Fees | $ $7.90 | 05/11/2012 |

NEWTON, IA 50208-9998

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Street, Apt. No.; or PO Box No.
City, State, ZIP+4

PS Form 3800, August 2006 See Reverse for Instructions