



Walter Wright, Jr.
wwright@mwlaw.com
(501) 688.8839

Hazardous Waste Enforcement: U.S. Environmental Protection Agency and Richmond, Missouri Epoxy Manufacturing Facility Enter into Consent Agreement

10/18/2024

The United States Environmental Protection Agency (“EPA”) and Arnette Polymers, LLC (“Arnette”) entered into an August 19th Consent Agreement and Final Order (“CAFO”) addressing alleged violations of the Missouri hazardous waste regulations. See Docket No. RCRA-07-2024-0079.

The CAFO provides that Arnette owns and operates a facility in Richmond, Missouri that manufactures epoxy and polyurethane intermediate products.

A predecessor of Arnette is stated to have notified the Missouri Department of Natural Resources pursuant to Section 3010 of the Resource Conservation and Recovery Act (“RCRA”) as a Large Quantity Generator (“LQG”) of hazardous waste. Further, the facility is stated to have obtained a RCRA ID number.

EPA inspectors are stated to have conducted a RCRA Compliance Evaluation Inspection (“Inspection”) on June 28-29, 2023, of the hazardous waste management practices at the Arnette facility.

Arnette is stated to have received a Notice of Preliminary Findings on June 29, 2023, related to the Inspection. This included identification of measures taken during the Inspection.

Arnette responded to this document by identifying additional corrective actions completed and plans for completing the remainder.

The Inspection is alleged to have identified the following violations:

- Failure to conduct hazardous waste determinations.
- Operating as a treatment, storage, or disposal facility without a RCRA Permit or RCRA Interim Status.
- Failure to minimize releases of hazardous waste.
- Failure to close Satellite Accumulation Containers.
- Failure to properly label Satellite Accumulation Containers.
- Failure to date Satellite Accumulation Containers.
- Failure to comply with Used Oil Regulations.

Arnette neither admits nor denies the CAFO’s factual allegations.

A civil penalty of \$24,318.00 is assessed.

A copy of the CAFO can be downloaded [here](#).