

Summary of Multi-Media Inspection of National Beef Leathers, St. Joseph, Mo.

- From April 29 through May 4, 2009, representatives from the U.S. Environmental Protection Agency Region 7 and the Missouri Department of Natural Resources conducted a multi-media inspection of the facilities of National Beef Leathers (formerly Prime Tanning), located at 205 Florence Road in St. Joseph, Mo.
- The purpose of this multi-media inspection was to determine compliance with air, water, and waste regulations.
- The air regulations (federal Clean Air Act) portion of the inspection found only some recordkeeping issues that the company agreed to address. The facility was not cited for any Clean Air Act violations during the inspection.
- The water regulations (federal Clean Water Act) portion of the inspection focused on the plant's pretreatment system. Analysis of pretreatment wastewater samples collected by EPA during this portion of the inspection showed all samples were within permit limits. Samples of the plant's wastewater biosolids were also collected and analyzed. (Hexavalent chromium was not detected in those samples at the recognized method detection limit of 3 milligrams per kilogram.) The facility was not cited for any Clean Water Act violations during the inspection.
- In the waste regulations portion of the inspection, several regulatory violations of the federal Resource Conservation and Recovery Act (RCRA) were documented:
 - National Beef failed to perform hazardous waste determinations on a number of wastes and waste streams at the facility, including about five laboratory waste streams and maintenance wastes that are treated at the facility's wastewater treatment system, and various residues found in about 14 tanks and other containers around the facility. (A hazardous waste determination is a regulatory compliance step that requires analytical testing results or the professional judgment of a regulated facility to determine whether a waste is properly defined as hazardous, in accordance with RCRA.)
 - National Beef failed to properly label and store waste lamps and used batteries.
 - National Beef failed to close a 55-gallon container of used oil.
- None of the deficiencies noted above would appear to have any impact on chromium levels in the wastewater sludge generated by National Beef. Analysis of samples collected by EPA during the inspection at the plant showed levels of hexavalent chromium ranging from non-detectable (for several sludge and process samples) to 42 parts per million (from a sample of tanning solution).
- EPA will require National Beef to conduct the hazardous waste determinations noted above and to provide documentation that other violations have been corrected.

- Depending on the results of the hazardous waste determinations, other violations may be documented.
- EPA will then determine any appropriate actions needed in response to the violations documented and to ensure future compliance. Any enforcement actions taken or penalties assessed would be in accordance with EPA's established Enforcement Response Policies and Civil Penalty Policies.