



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
RESOURCE CONSERVATION AND RECOVERY ACT**

GENERAL INFORMATION

Facility Name: Hexcel Corporation

RCRA ID: UTR000002527

Facility Location:

6700 West 5400 South,
West Valley City, Utah

Facility Contacts:

Shelley Balback-Tucker, EHS Manager:
Fibers, 801-938-4240
Joseph DiMartino, Environmental Engineer,
385-267-5426

Notification Status:

Large Quantity Generator

Dates of Inspection: August 24, 2022 &
August 25, 2022

Arrival Time: 9:12 a.m. on 8/24/2022

Departure Time: 3:10 p.m. on 8/25/2022

Lead Inspector & Report Author: Annette Maxwell, U.S. EPA RCRA Inspector

Inspection Attendees:

1. Kristin McNeill, U.S. EPA RCRA Inspector
2. Nathan Delhiero, U.S. EPA RCRA Inspector
3. Judy Moran, DWMRC RCRA Inspector
4. Erika Greenwell, DWMRC RCRA Inspector
5. Shelley Balback-Tucker, Fibers EHS Manager, Hexcel Corporation (Hexcel)
6. Joseph DiMartino, Environmental Engineer, Hexcel
7. Brock Powell, Matrix Operations Manager, Hexcel
8. Brandon Reese, Regional EHS Manager, Hexcel
9. Brian Nash, Fibers Plant Manager, Hexcel
10. Jake Loader, Fibers Operations Manager, Hexcel
11. Kevin Randall, Matrix Plant Manager, Hexcel

The following facility personnel participated in portions of the inspection but did not attend the opening or closing conferences:

12. Chris Carlyle
13. Felipe Ramirez
14. Joel Rodriguez
15. Scott Matthews
16. Mac Halley
17. Additional personnel were present for portions of the inspection, but their names were not provided/recorded

Type and Purpose of Inspection: Compliance Evaluation Inspection
Compliance with RCRA Subtitle C

Facility Name: Hexcel Corporation (UTR000002527)

Facility Location: 6700 West 5400 South, West Valley City, Utah

Dates of Inspection: August 24, 2022 & August 25, 2022

Facility Type: Artificial and Synthetic Fibers and Filaments Manufacturing, Plastics Material and Resin Manufacturing

Applicable Regulations: R315-260 to R315-273 of the Utah Administrative Code (UAC) and R315-15 of the UAC

Inspection Type: Announced Inspection
EPA inspection with DWMRC accompanying

Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection. The information provided does not constitute a final decision on compliance with RCRA regulations, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

OPENING CONFERENCE

Upon arrival at the facility, an opening conference was conducted with the above-noted inspection attendees. Kristin McNeill and I presented our federal inspector credentials to the facility personnel and explained the purpose of the inspection. We were not denied access to the facility and were allowed to inspect all areas that we selected for inspection.

The following information was obtained verbally during the inspection from the above-listed facility personnel unless otherwise noted.

DESCRIPTION OF INSPECTION

Regulatory Status

According to RCRAInfo, Hexcel is a large quantity generator (LQG) of hazardous waste. During the inspection, Mr. DiMartino confirmed this generator status.

Facility and Process Description

Hexcel Corporation (Facility) processes are divided into two primary operations: Fibers and Matrix. In the Fibers portion of the facility, extruded monomer precursor consisting largely of carbon are converted to carbon fibers using carbonization, oxidation, and surface treatment (etching to align carbon fibers) followed by sizing and packaging. Some material is then transferred to the Matrix portion of the facility for chemical treatment and impregnation with glass or kevlar and for formation into sheets. Users of finished product include those in the aerospace industry, where examples of usage include fuselages, wings, and engine fan blades.

The facility operations are spread out across 11 major buildings (see Attachment 1 – Site Map). At the time of the inspection, Fibers had 13 production lines in operation. Two additional lines operate at overseas locations: Line 9 operates in Spain and Line 17 operates in France. The Facility is

Facility Name: Hexcel Corporation (UTR000002527)

Facility Location: 6700 West 5400 South, West Valley City, Utah

Dates of Inspection: August 24, 2022 & August 25, 2022

approximately 105 acres in size. Approximately 860 personnel were employed at the Facility at the time of the inspection, including approximately 350 personnel in Matrix and 510 personnel in Fibers. The Facility operates 24 hours per day, 365 days per year, primarily with 12-hour shifts. Hexcel Corporation is both the Facility owner and operator.

Hazardous waste generation at the Facility occurs in production areas across the site and is managed in satellite accumulation areas and one 90-day central accumulation area, and includes, but is not limited to, process rags, resins, and solvents. Universal waste generated at the site includes lamps, batteries, and aerosol cans. Used oil is generated during equipment maintenance. Veolia is used for disposal of hazardous waste solvents and Clean Harbors is used for all other hazardous waste disposal. The facility does not perform wastewater treatment and does not have a pre-treatment permit to dispose of wastewater to the sanitary sewer following treatment. Wastewater disposed to the sanitary sewer without treatment is regularly sampled. The wastewater treatment facility receiving discharges to the sewer is the Central Valley Water Reclamation Facility.

Air pollution control devices that accumulate waste include four baghouses on the Fiber side and three baghouses on the Matrix side. Waste baghouse dust is nonhazardous. Bubblers located at Fibers Building 13/14 and Building 2/3 are used to strip xylene from sizing waste prior to discharge to the sanitary sewer.

Facility personnel responsible for signing hazardous waste manifests at the time of the inspection were Chris Carlyle and Shelley Balback-Tucker.

Based upon the facility's 2021 Biennial Report, commonly generated hazardous waste includes, but is not limited to:

- Waste flammable solvents – D001, D035, F002, F003, F005
- Waste γ -butyrolactone (BLO) water – D035, F002, F003, F005
- Process rags and debris – D001, D035, F001, F002, F003, F005
- Waste flammable resin – D001, D035, F003, F005
- Waste n-methyl-2-pyrrolidone (NMP) – D035, F005
- Waste solvated water – F001, F002, F003, F005

Spent methylene chloride is also generated at the facility, but as described below, is shipped for direct reuse, and therefore is not managed as a hazardous waste.

The facility holds a UPDES permit (per the Integrated Compliance Information System database: Permit No. UT0025305 with discharge to the Utah Salt Lake Canal). Mr. DiMartino stated that parameters monitored include pH, BOD, TSS, and TDS.

TOUR INFORMATION

Ms. Balback-Tucker and Mr. DiMartino accompanied us site-wide during the Facility tour, and other personnel accompanied during portions of the tour.

Facility Name: Hexcel Corporation (UTR000002527)

Facility Location: 6700 West 5400 South, West Valley City, Utah

Dates of Inspection: August 24, 2022 & August 25, 2022

All photographs collected during the inspection and referenced below are included in Attachment 2 – Photograph Log.

Areas of the Facility included in the site tour:

- Fibers Building 15/16, both Lines 15 and 16
 - Creel
 - Oxidation
 - Carbonization
 - Surface Treatment
 - Sizing
 - Winding
- Building 13/14 Bubbler Area
- Fibers Lab
- Fibers Lab Shed – satellite accumulation area (SAA)
- Central Accumulation Area
- Matrix Main Lab
- Matrix Lab SAA (outdoors on north side of Matrix Lab)
- Fibers Maintenance
- West Stormwater Pond
- C Mix
 - Vessels
 - Vessel Area SAAs
 - Film Room
 - Pre-Preg Lines
 - Packaging
 - Matrix Maintenance
- Building 2478
 - IPC Lab
 - Kroenert Filmer Area
 - Solution Mix House
 - Part B Crush Room (upper mix house)
 - Hot Room (upper mix house)
 - Mixer Area (upper mix house)
- Building 2422 - Legacy Hot Melt
- East Stormwater Pond

The following narrative includes areas listed above in which conditions of interest or potential deficiencies were noted. The information included below was obtained by my observation or by explanation provided by the accompanying facility personnel unless otherwise noted.

On Fibers Line 15, I observed water on the floor in the oxidation area. This was described by Mr. Loader to be related to activities from a line shutdown. Cooling water is generated in this area because waste fibers are very hot and are dunked into water before placement into the dumpster.

Facility Name: Hexcel Corporation (UTR000002527)

Facility Location: 6700 West 5400 South, West Valley City, Utah

Dates of Inspection: August 24, 2022 & August 25, 2022

In the Line 15 surface treatment area, electrolytic bath filters are changed daily.

In the Line 15 sizing area, an epoxy bath is used for approximately three weeks before it is discharged to the floor and squeegeed to a floor trench and sump located in a side room, where it is collected and pumped into totes prior to being transported by forklift to bubblers for treatment. See photo 2. I observed liquid accumulated in the grated floor trench, see photos 1 and 2. The facility personnel stated that this “sizing waste” is not hazardous and contains xylene and carbo wax that is diluted with water. Mr. Loader stated that xylene is extracted out via the bubblers and the remaining wastewater is discharged to the sewer. He stated that there are two locations where the bubbling occurs: two bubbler tanks are located near Line 3 that receive sizing waste from the legacy lines and two additional bubbler tanks are located near Line 13 that receive sizing waste from the new lines. Following the inspection on 9/8/2022, Ms. Balback-Tucker provided photographs showing that the Line 15 sizing area side room floor trench/sump had been cleaned out. See Attachment 3 – Facility Correspondence. Additional discussion regarding the bubblers is included below.

An SAA was also set up in the side room at Line 15, but SAA containers were not present at the time of the inspection. Certain hazardous waste typically accumulated in this SAA was being generated and initially managed at the epoxy bath area located outside of the side room SAA, with rags and PPE collected in a small container at the line and brought to this SAA at the end of each run, which may last up to 17 hours. This waste is managed at the SAA as contaminated process rags. This appears to be a potential in-process collection point that is transferred to the SAA. SAAs may be used for accumulation of hazardous waste if they are located at or near the point of generation and are under the control of the operator. Pursuant to R315-262-15(a)(6), hazardous waste must be transferred from an SAA to a central accumulation area (CAA) or transported for disposal to an authorized offsite disposal facility and therefore cannot be transferred from one SAA to another SAA. Guidance issued by the Utah Department of Environmental Quality titled *Satellite Accumulation Area (SAA) Guidance Document*, dated July 2021, document number DSHW-2021-010963, indicates that in-process waste initially managed at collection points that meet the “integral to the process” condition before transfer to an SAA is not considered to be SAA-to-SAA transferred. However, the guidance clarifies that, “[t]o be considered “in-process” the container must be emptied into an SAA or CAA at the end of the work shift by the operator. If the [hazardous waste] container is not emptied at the end of the work shift, it is an SAA and is subject to the SAA requirements.” Because the collection container is used to collect rags and PPE from more than one shift prior to transfer to the SAA located in the side room, this activity is an SAA-to-SAA transfer of hazardous waste. At Line 16 I observed the same arrangement, with two 55-gallon drums present in the sizing area side room SAA, see photo 3. One of the drums was labeled “Waste BLO” and the other drum was labeled “Contaminated Process Rags”. Both drums were also labeled with the words “Hazardous Waste” and pictograms indicating the hazards. Mr. DiMartino stated that every line in Fibers has the same two SAA wastes: Waste BLO and Contaminated Process Rags.

The sizing area contaminated process rag SAAs are included below in the section titled “Inspection Follow-up”.

At the Building 13/14 bubbler area, I observed two 1500-gallon bubblers approximately 5 feet x 21 feet in size, see photo 4. Mr. Carlyle explained that the bubblers run for a minimum of five days, and often

Facility Name: Hexcel Corporation (UTR000002527)

Facility Location: 6700 West 5400 South, West Valley City, Utah

Dates of Inspection: August 24, 2022 & August 25, 2022

longer. He stated that Purex laundry detergent is used to break the surface tension, and air is run through the bath to strip off xylene. Fume hoods over each bath vent to the atmosphere.

Samples are collected every 10th tank and the results are provided to the Central Valley Water POTW. Analyses include VOCs (including acetone and xylene), phosphorus, and pH. A 55-gallon SAA container in this area was labeled “Contaminated Process Rags”, “Hazardous Waste”, and with a pictogram marking an indication of the hazard. Mr. Carlyle stated that solids settle near the valve, and rags used to wipe away the solids are placed in this SAA along with PPE. Regarding pH, Mr. Carlyle said that the pH is usually 6-8, but at times they have to raise the pH a bit to meet the discharge requirements. He also said that about once per year Clean Harbors conducts cleanouts of the tanks, and that this produces non-hazardous sludge. I observed two black metal 55-gallon drums, identified during the inspection to contain the sludge, labeled “Waste Epoxy Resin, Regulated, Non-hazardous Waste”.

Third-rinse BLO is collected in totes and stored in the bubbler area prior to discharge to the sewer without bubbling; the two preceding rinses are drummed as hazardous waste.

Following the inspection, on 9/8/2022, Ms. Balback-Tucker provided a waste profile for the BLO water that indicates that hazardous waste codes D035, F002, F003 and F005 are applied to this waste stream, consistent with the facility’s 2021 Biennial Report.

At the Fibers Lab, Joel Rodriguez stated that methylene chloride waste is collected in a hood and transferred to a small tank in the outside Fibers Lab Shed before being shipped to Benco in Tennessee for reuse. See photo 5. During the records review portion of the inspection, documentation regarding this use was reviewed. No concerns regarding this documentation were identified at the time of the inspection.

Also at the Fibers Lab, I observed two silver trash cans used for collection of PPE including gloves, coats and plastic sheeting that was contaminated with F002 methylene chloride waste. Mr. Rodriguez stated that these containers are emptied into an SAA located in the outside Fibers Lab Shed located adjacent to the lab at the end of each shift. Based upon the explanation above regarding Utah DEQ guidance on the use of in-process containers “integral to the process” transferred to a SAA no later than the end of each shift, this appears to be an allowable practice and not a SAA-to-SAA transfer that would violate R315-262-15(a)(6). In the SAA area in the outside Fibers Lab Shed, I observed a black 55-gallon drum labeled “Contaminated Process Rags”, “Hazardous Waste”, and a pictogram indicating the hazard. The methylene chloride collection container was a separate black 55-gallon drum with piping attached to the top with the words “Used MeCl” (referring to methylene chloride) written on the lid. I also observed a 5-gallon bucket stored in this area, and Mr. Rodriguez stated that it is used for sizing concentrate generated in the lab during testing. Mr. DiMartino stated that this waste is transferred to the bubbler for treatment.

At the Central Accumulation Area (CAA), I observed that the structure was roofed, walled on three sides, and partially gated on the 4th side. Wastes in the CAA included:

- 81 drums of flammable liquid hazardous waste from Building 2478;
- three drums of n-methyl-2-pyrrolidone (NMP) hazardous waste;
- nine small boxes of hazardous waste flammable liquids pending analysis;

Facility Name: Hexcel Corporation (UTR000002527)

Facility Location: 6700 West 5400 South, West Valley City, Utah

Dates of Inspection: August 24, 2022 & August 25, 2022

- six drums of hazardous waste γ -butyrolactone BLO water from second rinses;
- one drum of hazardous waste flammable resin; and
- three drums of mixed solvent hazardous waste.

I observed that all of these containers were labeled with the words “Hazardous Waste”, an indication of the hazards, and an accumulation start date.

Also in the CAA, 17 drums of hazardous waste solids containing MEK and acetone were marked with the words “Hazardous Waste” and with the accumulation start date, but instead of an indication of the hazards specific to the waste, these containers were marked with DOT Class 9; although this marking is appropriate for transport of hazardous waste for applicable DOT requirements, it does not provide information specific to the waste that would indicate the hazards as required by UAC R315-262-17(a)(5)(i)(B).

Two used oil drums in the CAA were properly labeled. A tote was labeled, “This waste is not regulated as hazardous waste under 40 CFR Part 261”, and Mr. Carlyle stated that the tote contained waste from an old septic tank. Two drums contained non-hazardous epoxy resin. 19 drums contained used methylene chloride. Two totes containing BLO rinse water from the bubbler were labeled “non-hazardous”. A red roll-off container located near the CAA held crushed drums awaiting recycling.

In a SAA located in the CAA area were: one drum of universal waste aerosol cans; one drum of contaminated process rags hazardous waste; and one drum of crushed mercury-containing lamps. I observed that these SAA containers were closed, labeled with the words “Hazardous Waste” and an indication of the hazards or were labeled in accordance with the universal waste labeling requirements. One drum of hazardous waste paint located in the SAA was not marked with the words “Hazardous Waste” as required by R315-262-15(a)(5)(i), but I observed Mr. Carlyle mark the container with the words “Hazardous Waste”.

Mr. Carlyle stated that accumulation start dates are marked on hazardous waste containers upon their delivery to the CAA.

In the Matrix Main Lab area, a SAA is located outdoors on the north side of the building in a secured, fenced area accessible only by laboratory and environmental staff. A flammable cabinet in this area contained dozens of small containers of hazardous waste and I observed that the individual containers were not labeled with the words “Hazardous Waste” or an indication of the hazards as required by R315-262-15(a)(5). See photo 6. Next to the flammables cabinet, I observed three drums: one drum of mixed solvent that was labeled with the words “Hazardous Waste” but was not marked with an indication of the hazard as required by R315-262-15(a)(5)(ii); one drum of used oil, properly labeled; and one drum of contaminated process rags, properly labeled.

At the Fibers Maintenance building, I observed one drum of used oil that was marked with the words “Waste Oil” and I observed as the container was relabeled with the words “Used Oil” as specified in R315-15-2.3(c)(1).

In the C-Mix building, I observed an SAA containing hazardous waste BLO used for cleaning. The waste is piped from two vessels at the end of batches or campaigns. Operators in this area are

Facility Name: Hexcel Corporation (UTR000002527)

Facility Location: 6700 West 5400 South, West Valley City, Utah

Dates of Inspection: August 24, 2022 & August 25, 2022

responsible for transferring full 55-gallon drum SAA containers to the CAA; drums are considered full and ready for transfer when four inches of headspace is left in the container.

In the Matrix Maintenance area, aerosol can waste is collected and occasionally transported to the CAA. In Utah, hazardous waste aerosol cans can be managed as universal waste in accordance with UAC R315-273. However, at the time of the inspection I did not observe a collection container for aerosol can waste. Following the inspection, two photographs provided by Ms. Balback-Tucker on 9/8/2022 show a labeled box for universal waste aerosol cans located in the Matrix Maintenance area. The label includes the words “Universal Waste” and “Aerosol Cans” and appears to comply with the labeling requirements of UAC R315-273-14(g). Unlike other universal wastes, containers of aerosol can universal waste are not required to be closed, as long as the container meets the requirements of UAC R315-273-13(f)(1), unless the cans show evidence of leakage, in which case the cans must be packaged in a separate closed container or overpacked with absorbents, or immediately punctured and drained in accordance with the requirements of UAC R315-273-13(f)(4).

Building 2478 houses vertical towers used to run resin-dipped fibers through heated zones. A 55-gallon drum (see photo 7) labeled “Waste Water” was not labeled as hazardous waste, and at my request Mr. DiMartino stated that he would check on its status. Following the inspection, hazardous waste determination documentation was provided by Ms. Balback-Tucker on 9/8/2022 that showed by analytical testing that no constituents were present above the toxicity characteristic regulatory limits of R315-261-24.

Solvents used in the tower area include NMP, MEK, and/or acetone, based on the resin formulation. Approximately one drum of solvent waste is generated when cleaning. Recirculated solvent is pumped between the pan, bean pot, and totes located in rooms on each side of the tower area. 55-gallon drum SAA containers are also located in each of these two side rooms. In one of the side rooms, I observed that no waste was currently being added or removed from a 55-gallon SAA drum but it was not closed as is required by UAC R315-262-15(a)(4), and I then observed as Mr. Powell closed it.

In the IPC Lab, I observed a container for waste flammable solvent in a fume hood, which is emptied into the solvent drum in the side rooms at the end of each shift. Based upon the transfer into a SAA at the end of each shift, this appears to meet the “integral to the process” condition described above and so does not appear to be an SAA-to-SAA transfer that would constitute a violation of R315-262-15(a)(6).

In the Solution Mix House, I observed a floor trench, which facility personnel stated does not drain out, and contained nonhazardous mop water.

Outdoors near the northwest corner of the C-Mix building, I observed a baghouse dust collection setup using a 55-gallon drum. Mr. Powell stated that the baghouse dust is nonhazardous. During the record review portion of the inspection, baghouse dust hazardous waste determinations for both Fibers and Matrix were reviewed; no concerns regarding this documentation were identified at the time of the inspection.

Facility Name: Hexcel Corporation (UTR000002527)

Facility Location: 6700 West 5400 South, West Valley City, Utah

Dates of Inspection: August 24, 2022 & August 25, 2022

Before ending the site tour, we returned to the Matrix Main Lab SAA. I observed that the flammable cabinet was now empty and that an indication of the hazard in the form of a flammable pictogram had been added to the mixed solvent waste 55-gallon drum.

Additional information:

During a previous inspection performed by DWMRC on 10/15/2020, hazardous waste NMP was being managed as a hazardous secondary material (see DWMRC Inspection Report, Document No. DSHW-2020-017546). At the time of this August 2022 inspection, however, Mr. DiMartino stated that waste NMP is no longer managed as a hazardous secondary material and is instead sent for disposal. An example manifest for this hazardous waste is 017380908FLE shipped on 6/29/2022 to Clean Harbors in Hebron, Ohio, OHD980587364, with waste management method H020, solvents recovery (distillation, extraction, etc).

Record Review:

CAA Inspection Records: Inspection logs were reviewed, and no concerns were identified.

Hazardous Waste Manifests: Manifests for the date range January 1, 2022 through the date of the inspection were reviewed. Two manifests (017380908FLE and 016994176FLE) were identified as having shipped with greater than 45 days without a copy of the manifest with the handwritten signature of the owner or operator of the designated facility being received. Per UAC R315-262-42, LQGs must submit an Exception Report for such shipments. On August 30, 2022, Mr. DiMartino submitted an Exception Report to DWMRC for manifest 017380908FLE. Following the inspection, I reviewed the RCRAInfo e-Manifest database: 016994176FLE was shipped by Hexcel on 1/7/2022 and signed by the designated facility on 3/23/2022 (see Attachment 4 – Manifest 016994176FLE); 017380908FLE was shipped on 6/29/2022 and signed by the designated facility on 9/6/2022.

Contingency Plan: The facility's contingency plans viewed onsite for Fibers and Matrix were both missing quick reference guides, which is required by UAC R315-262-262(b). In addition, the listed emergency coordinators had recently changed but had not yet been updated. On 9/8/2022, Ms. Balback-Tucker provided a copy of the Emergency Response Plan Quick Reference Guide (QRG) and copies of certified mail receipts for Jordan Valley Medical Center, West Valley City Police Department, West Valley City Fire Department, and Intermountain Medical Center. The contents of the QRG included the types/names of hazardous waste; the associated hazard; the estimated maximum amount that may be present at any one time; any special treatment that may be required by medical or hospital staff; identification of on-site notification systems; the name of the emergency coordinators and 7/24-hour emergency telephone numbers; proof of submission (certified mail receipts) to local emergency responders; and a description of water supplies with flow rates. However, the QRG narrative references a map that was not included in the submission. In addition to the hydrant map which would satisfy the UAC R315-262-262(b)(6) requirement for including the locations of water supplies, the QRG did not include a map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes as required by UAC R315-262-262(b)(4), or a street map of the facility in relation to surrounding businesses, schools and residential areas to assist first responders in understanding how best to get to the facility and also evacuate citizens and workers as required by UAC R315-262-262(b)(5).

Facility Name: Hexcel Corporation (UTR000002527)

Facility Location: 6700 West 5400 South, West Valley City, Utah

Dates of Inspection: August 24, 2022 & August 25, 2022

Training Records: Training records were reviewed for Joseph DeMartino, Chris Carlyle, Jared Carling, and Felipe Ramirez, as well as training records for operators responsible for transporting hazardous waste from Matrix to the CAA. No concerns were identified for this documentation at the time of the inspection.

Additional Documentation Reviewed: A letter from West Valley City Fire Department dated 6/1/2021 and signed by the Fire Marshal that granted a setback variance from the required 50' from the facility property line for the CAA. This documentation appears to meet the requirements of UAC R315-262(a)(1)(vi)(A).

CLOSING CONFERENCE

During the closing conference, I discussed documentation that had been reviewed, initial findings, requested additional documentation, and stated that additional findings might arise during the report writing process. The findings discussed in the conference included concerns noted and resolved related to hazardous waste containers missing either the words "Hazardous Waste" or an indication of the hazards, and a used oil container missing the marking "Used Oil". Additional documentation requested included waste profiles, photos of corrections made with descriptions of those corrections, an explanation of the process for labeling of containers in the Matrix Lab SAA flammable cabinet, an updated QRG indicating the current emergency coordinators and phone numbers, a sample photo of process rags drum labels marked with the indication of the hazards, an exception report for manifest 017380908FLE, and hazardous waste determination information for the waste water drum in the tower area.

Post-Inspection Documentation Received

Following the inspection, on 8/29/2022 I requested by email as a follow-up to the closing conference:

- Waste profiles for
 - Waste BLO
 - Contaminated Process Rags waste
- Unedited photographs collected at the request of inspectors during the inspection.
- Photographs collected following the related portions of the site tour to document actions taken, along with a description of those actions taken.
- An explanation of the process to be used for labeling of containers held in the flammables cabinet in the Matrix Lab SAA so that those containers are compliant with UAC R315-262-15(a)(5).
- A copy of the updated contingency plan quick reference guide showing updated emergency coordinators and phone numbers; once the guide is shared with local emergency responders (i.e., police departments, fire departments, hospitals and State and local emergency response teams that may be called upon to provide emergency services), please provide documentation that the guide has been submitted (ref: UAC R315-262-262(b)).
- A photograph of a sample label for the contaminated process rags after they are prepared for shipping; we do not request a change to the use of hazard class 9 if that is what the facility has deemed appropriate for DOT labeling, but request that an additional, specific indication of the hazards of the contents be added.

Facility Name: Hexcel Corporation (UTR000002527)

Facility Location: 6700 West 5400 South, West Valley City, Utah

Dates of Inspection: August 24, 2022 & August 25, 2022

- For hazardous waste manifest 017380908FLE, please provide a copy signed by the designated facility; if a designated facility-signed copy is not available, or if the designated facility signature is more than 45 days after the shipped date, please submit an exception report to the Utah Department of Environmental Quality and copy or forward to me by email.
- Regarding the 55 gallon drum labeled “Waste Water” in building 2478, please provide documentation of a hazardous waste determination.
- For waste aerosol cans collected in the Matrix Maintenance Shop, please provide a copy of a Universal Waste label or description of marking for containers (e.g. boxes) to be used to collect and transport waste aerosol cans to central accumulation; such labels or markings must meet the requirements of UAC R315-273-14(g). [note: this item was not discussed during the closing conference]

On 8/31/2022, Mr. DiMartino provided by email to DWMRC with copy to EPA a manifest exception report for hazardous waste manifest 017380908FLE. On 9/8/2022, Ms. Balback-Tucker provided the following documentation by electronic file transfer using EPA’s GoAnywhere FTP service (Attachment 3 – Facility Correspondence):

- Clean Harbors Waste Material Profile Sheet for Blo Water
- Clean Harbors Waste Material Profile Sheet for Process Rags and Debris
- Photographs with narrative of work undertaken following the inspection [marked Confidential and Proprietary] regarding the:
 - Main Matrix Lab Satellite Accumulation Area,
 - Fibers Lab Mechanical Testing Area, and
 - Fibers Line 15 Sizing Room.
- A narrative description and photographs of changes made for labeling of containers in the Matrix Main Lab SAA flammables cabinet [marked Confidential and Proprietary]
- The Emergency Response Plan Quick Reference Guide, effective date August 29, 2022
- Photographs of Contaminated Process Rags labels including indication of the hazard placards [marked Confidential and Proprietary]
- A letter addressed to DWMRC providing notice that a signed copy of a manifest was not received within 45 days.
- Hazardous waste determination documentation for a drum of wastewater in Building 2478.
- Photographs of aerosol can universal waste labels

INSPECTION FOLLOW-UP

Follow-up is needed to address the following:

1. Transfer of hazardous waste between SAAs.
2. Use of DOT Class 9 markings to meet UAC R315-262-17(a)(5)(i)(B).
3. Contingency Plan QRG content shared with local emergency responders.

Details regarding requested follow-up will be included in correspondence to the facility, as appropriate.

Facility Name: Hexcel Corporation (UTR000002527)
Facility Location: 6700 West 5400 South, West Valley City, Utah
Dates of Inspection: August 24, 2022 & August 25, 2022

SIGNATURES

ANNETTE MAXWELL Digitally signed by ANNETTE MAXWELL
Date: 2023.03.14 14:30:54 -06'00'

Annette Maxwell, Lead RCRA Inspector

Pearson, Janice Digitally signed by Pearson, Janice
Date: 2023.03.15 14:27:44 -06'00'

Janice A. Pearson, Manager
RCRA & OPA Enforcement Branch
Enforcement and Compliance Assurance Division

ATTACHMENT LIST

Attachment 1 – Site Map
Attachment 2 – Photograph Log [contains confidential/proprietary business information]
Attachment 3 – Facility Correspondence [contains confidential/proprietary business information]
Attachment 4 – Manifest 016994176FLE