

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

CESSNA AIRCRAFT COMPANY MID-CONTINENT FACILITY

6330 Southwest Blvd
Wichita, KS 67215
(316) 712-3694

EPA ID Number: KSD000809673

On

September 17, 2024

By

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region 7

Enforcement and Compliance Assurance Division

1.0 INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division, I conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Cessna Aircraft Co. Mid-Continent Facility (Cessna Mid-Continent), located in Wichita, Kansas, on September 17, 2024. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. During the CEI, I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. The inspection report and attachments present the results of the CEI.

2.0 PARTICIPANTS

Cessna Mid-Continent:

Kaetlyn Blocker, Environmental Manager, kblocker@txtav.com, 4 years with the company
Mike McCue, Manager, 33 years with the company
Carolina Rayes, Environmental Engineer, 3 months with the company
Leah Shenolde, EHS Engineer, 3 years with the company
Mike Hanner, Maintenance Leader, 12 years with the company
Jimmy Martinez, Senior Maintenance Manager, 2 years with the company

U.S. Environmental Protection Agency (EPA):

Koba Butkovich, Physical Scientist (Lead Inspector)
Edwin G. Buckner, PE, Environmental Engineer

3.0 INSPECTION PROCEDURES

Prior to beginning the CEI at Cessna Mid-Continent on September 17, 2024, I conducted a drive-by visual inspection. I did not observe any areas of concern during the drive-by. Upon my unannounced arrival, I entered building P40 (see Facility Map, Attachment 6, for building locations) on the southern end of the facility, introduced myself and Mr. Buckner to the front desk attendants and requested to meet the facility's site contacts. The on-site employees called the facility representatives who were located at a nearby sister facility. After a period of approximately fifteen minutes, the facility representatives, led by Mr. Mike McCue as well as Ms. Kaetlyn Blocker and Mr. Alastair Stark, met us. We were escorted to a conference room located at building W21, where I proceeded to conduct an entry briefing. During this briefing, Ms. Carolina Rayes and Ms. Leah Shenolde also arrived and introduced themselves.

During the entry briefing, I presented my business card and EPA credentials to the facility representatives. I explained the scope and procedures for the CEI. I explained the facility's right to make confidentiality claims and provided a Notice Regarding Proprietary/Confidential Business Information. I stated that at the conclusion of the CEI, the facility would be presented with a Confidentiality Notice with which they could make or not make a claim of confidentiality for the facility. I also provided a copy of Title 18 U.S. Code, Sections 1001 and 1002, concerning communication of false statements and documents to federal inspectors, and RCRA Section 3007(a), explaining EPA's inspection authority, both of which Mr. McCue read.

Document photocopies and photographs were collected as inspection documentation (attachments 1-9). A total of 25 photographs were collected and a photolog was prepared (attachment 1). I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.1E), unless noted differently. Any authorized Federal regulatory citations noted in this report are adopted by reference in the authorized Kansas regulations.

The CEI consisted of a discussion of facility operations, waste generation, and waste management; a review of waste management records; and a visual inspection of waste generation and management areas. A map of the facility was obtained during the CEI and is included as Attachment 6. An aerial photograph of the facility is included as Attachment 7.

I conducted the visual inspection and the records review accompanied by Mr. Buckner, Ms. Blocker, Mr. Stark, Ms. Rayes, and Ms. Shenolde. Mr. McCue left after the entry briefing for a sister facility, Cessna Aircraft Company Pawnee Facility (KSD007233596), that was being inspected by EPA RCRA on the same day. Mr. McCue returned to attend the exit briefing. During the visual inspection, I observed waste generation and storage areas in and around Buildings W17, W8, W15, W20, W24, P43, and P39. During the records review, I reviewed facility documentation that included weekly inspection logs, the RCRA contingency plan, training records, job titles and descriptions, and the 2023 biennial report.

I conducted an exit briefing with all previously mentioned facility representatives, as well as Mr. Matt Hanner and Mr. Jimmy Martinez. During the exit briefing, I provided Mr. McCue with a Receipt for Documents and Samples (Attachment 3), a Confidentiality Notice (Attachment 4), and a Notice of Preliminary Findings (NOPF) (Attachment 5), which he signed to acknowledge receipt. No confidential business information claims were made by Mr. McCue.

A copy of each of the following documents was left with the facility during the inspection:

- RCRA Facility Access Information Sheet
- Inspector Business Cards
- RCRA Section 3007
- U.S. Federal Codes 1001 and 1002
- Instructions for Responding to a Notice of Preliminary Findings
- Notice Regarding Proprietary/Confidential Business Information
- U.S. EPA Small Business Resources Information Sheet
- E-Manifest Fact Sheet: Generators
- Managing Your Hazardous Waste: A Guide for Small Businesses

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Description and General Information

Cessna Mid-Continent is an aircraft manufacturer with a focus on assembly and completion from component parts of various passenger and light jet aircraft. Textron Aviation Inc. owns Cessna, which operates the facility.

The facility spans approximately 600 acres and employs approximately 7,500 total employees, including 4,000 manufacturing employees. Processes used at the facility include metal machining, grinding, polishing, tumbling, pressure deformation, shearing, heat treating, electroplating, metal finishing, chemical etching and milling, chemical conversion coating, anodizing, priming, painting, graphite composite lay-up and curing, as well as engineering, testing, and quality assurance procedures to confirm these processes.

Multiple hazardous wastes are generated from these processes and manufacturing operations. These wastes are accumulated in various satellite containers throughout the facility, as well as Kansas-regulated day can containers. The facility also maintains seven less than 90-day central accumulation areas (CAA) that accumulate waste from multiple waste streams from throughout the facility.

Cessna Mid-Continent had been last inspected for RCRA compliance on May 20, 2015, by the Kansas Department of Health and the Environment (KDHE). During the previous KDHE inspection, the following findings were cited:

- Failure to ship three containers of universal waste within one year, as required by 40 C.F.R. 273.15(a).
- Failure to store hazardous waste in a container, as required by 40 C.F.R. 262.34(a)(1)(i).
- Failure to use only one satellite container of the same waste stream for two areas, as required by K.A.R. 28-31-262(c)(6).
- Failure to mark 12 satellite accumulation containers with the words “Hazardous Waste”, as required by K.A.R. 28-31-262(c)(7).

- Failure to close 11 satellite containers except when adding or removing waste, as required by 40 C.F.R. 265.173(a).
- Failure to provide copies or revisions of the contingency plan to local emergency response agencies, as required by 40 C.F.R. 265.53(b).

Of these preliminary findings, failure to store hazardous waste in a container, failure to mark satellite accumulation containers with the words “Hazardous Waste,” and failure to close satellite containers were repeated findings from this inspection.

4.2 RCRA Status

I reviewed the Notification Acknowledgement/Verification Report (Attachment 2) with the listed site contact, Ms. Blocker. No changes were made to the Verification Report. The Verification Report indicated that Cessna Mid-Continent facility, under EPA ID KSD000809673, had notified and was operating as a large quantity generator (LQG) of hazardous waste (generating more than 1,000 kilograms [kg] of hazardous waste per month). During the CEI, I confirmed Cessna Mid-Continent’s large quantity generator status through a review of current operations, interviews, and a review of uniform hazardous waste manifests and the 2023 biennial report.

Based on the 2023 Biennial Report summary (Attachment 8), Cessna Mid-Continent generated over 500,000 pounds of hazardous waste, primarily paint waste and paint-related waste streams, in the calendar year of 2023. Hazardous wastes were consistently generated at a level above 2,200 pounds (1,000 kg) per month. I therefore inspected the facility as a LQG of D001, D002, D006, D007, D035, F003, F005, and F019 hazardous waste. I also inspected the facility as a small quantity handler of universal waste (accumulating less than 5,000 kg of universal waste at any time) and as a used oil generator.

4.3 Facility Waste Streams and Management

This section of the CEI report describes waste streams generated by the facility, including the facility’s waste determination and waste codes, generation process and rate, management at the facility, and ultimate disposition. The following table of waste streams, including hazardous waste, universal waste, used oil, and nonhazardous waste, is based on my interview with facility representatives, the visual inspection, and my review of available documentation, including the 2023 biennial report. Cessna Mid-Continent uses product and process knowledge, safety data sheets, and analytical testing, when necessary, to make accurate hazardous waste determinations and identify the applicable hazardous waste codes.

<u>Waste Description or Process</u>	<u>Waste Determination Method</u>	<u>HW Codes</u>	<u>Waste Generated Annually (2023 Biennial Report)</u>	<u>On-site Management</u>	<u>Off-site Management</u>
<u>Alodine Contaminated Debris</u>	Product and Process Knowledge	D007	65.0 lb.	-	OKD065438376 (Clean Harbors

					Lone Mountain), H141
<u>Crushed Lamps</u>	Product and Process Knowledge	D009	7415.0 lb.	Lamps are crushed in the W24 Building by a lamp crusher and managed afterwards as hazardous waste.	MOD981505555 (Heritage Environmental Services), H141
<u>Paint Filters, Rags, Debris</u>	Product and Process Knowledge	D006, D001, D007, F003, F005	412,680.0 lb.	Paint Filters, rags, and debris are generated throughout the facility, primarily in Building W8.	ARD981057870 (Rineco Chemical Industries), H061
<u>Paints/Solvent</u>	Product and Process Knowledge	D001, D007, D035, F003, F005	172,145.0 lb.	Waste paint and solvent is primarily generated in Building W8 and stored at W8 or other 90-day areas.	MOD981505555 / KSD980633259 (Systech Environmental Corporation), H061
<u>Wastewater Treatment Sludge</u>	Product and Process Knowledge	F019	7123.0 lb.	Wastewater treatment sludge is generated and stored in Building W15.	MOD981505555, H141
<u>Pit Cleanout Liquid</u>	Product and Process Knowledge	D006, D007, F002, F005	8630.0 lb.	-	MOD981505555, H061
<u>Alkaline Liquids</u>	Product and Process Knowledge	D002	2625.0 lb.	-	MOD981505555, H061 OKD065438376, H141
<u>Ethylene Glycol</u>	Product and Process Knowledge	D001	2550.0 lb.	-	MOD981505555, H061
<u>Waste Acids</u>	Product and Process Knowledge	D002, D006, D007	1540.0 lb.	-	IND093219012 (Heritage

					Environmental Services), H070
<u>Paint Stripper and Debris</u>	Product and Process Knowledge	D001, D007, D035, F003, F005	75.0 lb.		KYD053348108 (Safety-Kleen Systems), H061
<u>Acid Sludge and Debris</u>	Product and Process Knowledge	D002, D006, D007	155.0 lb.		OKD065438376, H132
<u>Waste Flammable Liquids</u>	Product and Process Knowledge	D001, D035	4261.0 lb.		ARD069748192 (Clean Harbors El Dorado), NCD000648451 (Clean Harbors Reidsville), NED981723513 (Clean Harbors Environmental Services), H040
<u>Waste Aerosols</u>	Product and Process Knowledge	D001	136.0 lb.	Cessna Mid-Continent manages waste aerosol cans as hazardous waste.	ARD069748192, NCD000648451, NED981723513, H141
<u>Waste Acid</u>	Product and Process Knowledge	D001, D007	32.0 lb.	-	NED981723513 (H141), ARD06948192 (H040)
<u>Loosepack Resin</u>	Product and Process Knowledge	D001	2710.0 lb.	-	NED981723513 (H141)
<u>Waste Amines</u>	Product and Process Knowledge	D002	660.0 lb.	-	ARD069748192, NCD000648451, NED981723513 (H040)
<u>Waste Organic Peroxide</u>	Product and Process Knowledge	D001	21.0 lb.	-	ARD069748192, NCD000648451, NED981723513 (H040)
<u>Waste Paint</u>	Product and Process Knowledge	D001	1765.0 lb.	Waste paint is primarily generated and stored in Building W8.	ARD069748192, NED981723513 (H040)

<u>Alkaline Degreaser</u>	Product and Process Knowledge	D001	250.0 lb.	-	NED981723513 (H040)
<u>Universal Waste Batteries</u>	Universal Waste	Universal Waste	-	Universal waste battery containers are spread throughout the facility and managed under universal waste standards.	O'Reilly Auto Parts Wichita, KS
<u>Treated Waste Water</u>	Nonhazardous	Solid Waste	-	Building W15 operates a wastewater treatment plant that also generates sludge.	City of Wichita Publicly Owned Treatment Works
<u>Universal Waste Lamps</u>	Universal Waste	Universal Waste	-	Lamps not intended for crushing are accumulated in the W24 building adjacent to the lamp crusher in cardboard containers.	-
<u>Used Oil</u>	Used Oil	Used Oil		Used oil is contained throughout the facility, including Buildings W17, W20, and P43.	Safety-Kleen Wichita, KS
<u>General Trash</u>	Nonhazardous	Nonhazardous	-	-	Waste Connections Plumb Thicket

4.3.1 Hazardous Waste Accumulation

At the time of the CEI, Cessna Mid-Continent maintained seven CAAs. These CAAs were located in the following areas: the 90-day Yard outside of Building W20; the Wastewater Treatment Plant (WWTP) in Building W15; the Paint Kitchen in Building W8; the Hazardous Waste Compactor outside of Building W8; the CPD; the P39 Lab Pack Area; and the W7-2 Tank

Line. As part of the CEI, I inspected all of these CAAs except for the W7-2 Tank Line and the CPD.

I inspected the CAA Hazardous Waste Compactor outside of Building W8. Ms. Blocker stated that red flammable solids satellite containers are moved from across the facility and emptied into the hazardous waste compactor (photograph 8). I observed a labeled and dated 40-cubic yard hazardous waste roll-off container connected to the compactor unit (Photograph 10). At the time of inspection, the compactor lid connecting to the roll-off container was open, and D001 ignitable hazardous waste was visible in the opening to the roll-off container. Therefore, the hazardous waste compactor container was not closed, as required by 40 C.F.R. 265.173(a) [NOPF 2].

I inspected the 90-day Yard outside of Building W20, which acted as an outside storage area for various 90-day hazardous waste streams, chemical products, and wastes that were pending a hazardous waste determination. I observed twelve 55-gallon Hazardous Waste Paint containers (photograph 12) that were closed and labeled with the words “Hazardous Waste.” In addition, at the Building W20 CAA, I observed two pallets of various solid waste containers (Photographs 13 and 14) that were closed and undergoing hazardous waste determinations.

Building W8 utilizes multiple paint bays and a paint mix room. I inspected the 90-day CAA adjacent to the paint bays in the building’s paint kitchen. The waste paint accumulation container was closed and labeled at the time of inspection (Photograph 20).

Building W15 operates a WWTP that services multiple work bays for stripping, priming, and painting aircraft. Treated water is discharged to a publicly owned treatment works in the City of Wichita, while toxic (F019) sludge, or filter cake, from the WWTP is dewatered and accumulated at the 90-day CAA in Building W15. I inspected the CAA located at Building W15 and observed an empty 55-gallon drum connected to the WWTP filter press (Photograph 21). At the time of inspection, no hazardous waste sludge was in accumulation at the W15 CAA.

Cessna Mid-Continent maintains two areas for lab packs. One such lab pack area is managed as a 90-day CAA and was located in Building P43, a Parts and Distribution Center. At the P43 CAA, I observed multiple lab pack containers that were closed, dated, and labeled with the words “Hazardous Waste” (Photograph 22). I noted no deficiencies with less than 90-day hazardous waste container management except for the NOPF noted above.

4.3.2 Satellite Accumulation

Cessna Mid-Continent utilizes satellite accumulation of hazardous waste in multiple areas of the facility. Cessna Mid-Continent also utilizes KDHE’s guidance for day accumulation, allowing for accumulation in day accumulation containers that empty to satellite containers at the end of each work shift. I visually inspected satellite accumulation areas (SAAs) and day accumulation containers in Buildings W7 W8, W20, W24, P39 and W2.

Building W7 is an extensive building that operates as an assembly area for completed aircraft and for fuselage, wing, and other aircraft components. At Building W7, I observed multiple distinct SAAs spaced throughout the building, totaling approximately forty observed satellite

containers of flammable solids, corrosives, and aerosol can waste streams (photographs 2, 3, 5, and 7). Most of these satellite accumulation containers were closed and labeled with the words “Hazardous Waste.” However, adjacent to an exit to Building W7, I observed an SAA that included an aerosol can satellite container (Photograph 7). The aerosol can container was labeled with the words “Hazardous Waste” but was overflowing and was not closed, as required by 40 C.F.R. 265.173(a) [NOPF 3].

In addition to standard satellite container management, Cessna Mid-Continent operates certain containers as day can containers under KDHE’s guidance that are emptied to an SAA at the end of each work shift. I inspected approximately 30 day can containers in Building W7 (photograph 1). Of these, I observed one day can container (photograph 6) that was closed but not labeled with the words “Hazardous Waste,” as required by K.A.R. 28-31-262(c)(7) [NOPF 4]. I provided compliance assistance on labeling for the day can container.

In Building W8, I observed three closed and labeled satellite accumulation containers of flammable solids in the paint bays, in addition to closed and labeled day can containers.

At Building W20, I observed an SAA with two closed and labeled satellite accumulation containers for aerosol cans and waste paint.

In Building W24, which acted as the facility’s storage area for universal waste lamps, I observed a lamp crusher (Photograph 15). Ms. Blocker stated that Cessna Mid-Continent crushes some of its waste lamps and manages the crushed lamps as D009 toxic hazardous waste. The 55-gallon crusher drum container was labeled with the words “Hazardous Waste.” However, the lamp entry tube was left unplugged. Therefore, the satellite accumulation container was not closed, as required by 40 C.F.R. 265.173(a) [NOPF 3]. In addition, a buildup of white, fluorescent powder (D009 toxic hazardous waste) had formed on top of the lamp crusher. I determined that the hazardous waste had not been containerized, as required by 40 C.F.R. 262.34(a)(1)(i) [NOPF 1]. I provided compliance assistance on the closing and handling of the lamp crusher container.

In Building P39, I observed an SAA for three lab pack boxes that each contained multiple sealed oxygen cylinders (Photograph 24). Only one of these three containers was labeled with the words “Hazardous Waste.” The handlers of the lab pack area had considered this sufficient labeling for all three containers. However, the facility had failed to label the other two satellite accumulation containers with the words “Hazardous Waste,” as required by K.A.R. 28-31-262(c)(7) [NOPF 4]. I provided compliance assistance on labeling for the oxygen cylinders.

In addition, I observed five closed and labeled satellite accumulation containers at the Building P39 SAA that were opposite to the lab pack containers (Photograph 23).

In Building W2, which operates as an engineering and testing area, I observed five closed satellite accumulation containers. One satellite accumulation container containing approximately 10 aerosol cans (Photograph 25) was not labeled with the words “Hazardous Waste,” as required by K.A.R. 28-31-262(c)(7) [NOPF 4]. I provided compliance assistance on labeling for the aerosol satellite accumulation container.

I noted no other deficiencies relating to satellite container management except for the NOPFs listed above.

4.3.3 Universal Waste

Cessna Mid-Continent operates as a small quantity handler of universal waste, with generation of universal waste batteries and universal waste lamps. Cessna Mid-Continent does crush universal waste lamps, but the facility manages crushed lamp waste as a D009 toxic hazardous waste separate from universal waste management.

In Building W24, I observed a cylindrical container of 8-foot universal waste lamps adjacent to the lamp crusher (Photograph 16). Ms. Blocker stated that these lamps were ultimately intended for crushing, but the container was still handled as a universal waste lamp container at the time of inspection. The lamp container was closed but not labeled with the words “Universal Waste – Lamps” or equivalent phrasing, as required 40 C.F.R. 273.14(e) [NOPF 6]. The lamp container was not dated or otherwise tracked to demonstrate accumulation time, as required by 40 C.F.R. 273.15(c) [NOPF 7].

I inspected additional universal waste lamp containers adjacent to the lamp crusher. These lamps were intended for disposal as universal waste without crushing. I observed an open universal waste lamp container containing approximately five 2-foot lamps (Photograph 17), an open universal waste lamp container containing approximately six 8-foot lamps (photograph 18), and an open universal waste lamp container containing approximately seven 4-foot lamps (Photograph 19). These three universal waste lamp containers were not closed, as required by 40 C.F.R. 273.13(d)(1) [NOPF 5]. In addition, the universal waste lamp containers were not labeled with the words “Universal Waste – Lamps” equivalent phrasing, as required 40 C.F.R. 273.14(e) [NOPF 6]. Also, the universal waste lamp containers were not or dated or otherwise tracked to demonstrate accumulation time, as required by 40 C.F.R. 273.15(c) [NOPF 7].

I observed two additional 2-foot lamp containers adjacent to the lamp crusher (photograph 17). Both containers were closed. The topmost universal waste lamp container had a label of “Universal Waste – Bulbs.” The 2-foot lamp container underneath the first container was unlabeled and had no visible date. I determined that these universal waste lamp containers were not labeled with the words “Universal Waste – Lamps” or other equivalent phrasing as required 40 C.F.R. 273.14(e) [NOPF 6]. Also, the universal waste lamp containers were not dated or otherwise tracked to demonstrate accumulation time, as required by 40 C.F.R. 273.15(c) [NOPF 7].

I observed eight additional 8-foot lamp containers adjacent to the W24 lamp crusher (Photographs 17 and 19). I observed that these containers were closed and that three of the eight 8-foot lamp containers were not labeled with the words “Universal Waste – Lamps” or equivalent phrasing, as required 40 C.F.R. 273.14(e) [NOPF 6]. I also observed that, while four of the eight containers had an accumulation start date of less than one year, the other four 8-foot lamp containers had no accumulation start date or were not otherwise tracked for accumulation time, as required by 40 C.F.R. 273.15(c) [NOPF 7]. I provided compliance assistance on the labeling and handling of universal waste lamps.

I observed no deficiencies relating to universal waste batteries.

4.3.4 Subpart CC Container Air Emissions

The EPA promulgated requirements for the control of air emissions from tanks, surface impoundments, and containers at 40 C.F.R. 265, Subpart CC. The State of Kansas has adopted by reference EPA requirements for generators of hazardous waste found at 40 C.F.R. Part 262. Cessna Mid-Continent is thus subject to Subpart CC requirements for containers accumulating hazardous waste with an average volatile organic concentration above 500 parts per million by weight.

Cessna Mid-Continent utilizes Level 1 controls for their containers of hazardous waste. I observed no deficiencies related to Subpart CC.

4.3.5 Required Response Equipment and Hazard Management

A large quantity generator must operate to minimize possibility of a fire, explosion, or spill, and must maintain emergency response equipment. During the CEI, I observed spill kits and fire extinguishers located throughout the facility and in proximity to hazardous waste accumulation areas. I also observed emergency preparedness information displays throughout the facility, such as in Buildings W17 and W20 (Photographs 4 and 11). The facility maintains emergency landline phones and a central phone line intended to contact local emergency response authorities. I noted no deficiencies related to required response equipment or hazard management.

4.4. Records Review

Uniform Hazardous Waste Manifests and Biennial Report

Cessna Mid-Continent generated multiple uniform hazardous waste manifests throughout its operations. Ms. Blocker provided Cessna Mid-Continent's records for uniform hazardous waste manifests and associated LDR notifications. I reviewed six uniform hazardous waste manifests and noted no issues. The facility submitted a hazardous waste biennial report for the calendar year of 2023 and provided a copy of their Biennial Report Summary upon request [Attachment 8]. I noted no deficiencies with uniform hazardous waste manifests or the biennial report during the CEI.

Personnel Training

I reviewed personnel training records with Ms. Blocker for the years 2022, 2023, and 2024. Cessna Mid-Continent conducts initial training for new hires and additional trainings annually, with various hazardous waste management and handling topics covered on a quarterly (three month) basis. I also reviewed written job descriptions, provided by Ms. Blocker, for hazardous waste operators and handlers. I observed no issues or findings related to personnel training or job descriptions.

Inspections

Cessna Mid-Continent conducts weekly inspections of its seven CAAs located throughout the facility. I examined the log of these weekly inspections throughout the years 2022, 2023, and 2024 and observed no deficiencies.

Contingency Plan

As a LQG, Cessna Mid-Continent must maintain a RCRA Contingency Plan. I asked to review the facility's current contingency plan and was provided with a copy, dated April 2024, of the most recent revision of the RCRA contingency plan (Attachment 9). Cessna Mid-Continent has provided this contingency plan to local emergency response agencies located in Wichita. I observed no deficiencies related to the RCRA contingency plan.

Cessna Mid-Continent also maintains a quick reference guide of its RCRA contingency plan that I reviewed at the time of inspection. However, under Kansas RCRA regulations, a quick reference guide is not required for an LQG.

5.0 Summary of Preliminary Findings

In summary, as part of the CEI, I made the following preliminary findings:

- (1) Failure to containerize hazardous waste fluorescent powder on a lamp crusher, as required by 40 C.F.R. 262.34(a)(1)(i).
- (2) Failure to close a hazardous waste compactor central accumulation container, as required by 40 C.F.R. 265.173(a).
- (3) Failure to close the following satellite accumulation containers, as required by 40 C.F.R. 265.173(a):
 - a. Aerosol cans in Building W7; and
 - b. Lamp crusher in Building W24.
- (4) Failure to label the following satellite accumulation containers with the words "Hazardous Waste," as required by K.A.R. 28-31-262(c)(7).
 - a. Day can container in Building W7;
 - b. O₂ lab pack cylinders in Building P39; and
 - c. Aerosol can container in Building W2.
- (5) Failure to keep universal waste lamp containers closed, as required by 40 C.F.R. 273.13(d)(1).
- (6) Failure to label universal waste lamp containers with the words "Universal Waste – Lamps" or equivalent phrasing, as required by 40 C.F.R. 273.14(e).
- (7) Failure to demonstrate accumulation time for universal waste lamp containers, as required by 40 C.F.R. 273.15(c).

Other than items specifically noted in the narrative, I observed no additional issues. However, further review by EPA may change or add to my findings.

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Koba Butkovich
Inspector
ECAD/CB/RCRA, EPA Region 7

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Amber Whisnant
Section Chief
ECAD/CB/RCRA, EPA Region 7

Attachments

1. Photolog, 25 Photos (28 Pages)
2. Notification Acknowledgement/Verification Report (1 Page)
3. Receipt for Documents and Samples (1 Page)
4. Confidentiality Notice (1 Page)
5. Notice of Preliminary Findings (3 Pages)
6. Facility Map (1 Page)
7. Aerial Photo (1 Page)
8. Biennial Report Summary (8 Pages)
9. RCRA Contingency Plan (31 Pages)