

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

**Springfield Remanufacturing Corp
650 North Broadview Place
Springfield, Missouri 65802
(417) 862-3501**

EPA ID Number: MOD000610634

On

August 20 - 21, 2024

By

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 7
Enforcement and Compliance Assistance Division (ECAD)**

1.0 INTRODUCTION

I performed a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Springfield Remanufacturing Corp (SRC), located at 650 North Broadview Place, Springfield, Missouri 65802, on August 20 – 21, 2024. I conducted the RCRA inspection under the authority of RCRA Section 3007(a), as amended. During the inspection, I collected the information and data necessary to make preliminary findings regarding compliance with the applicable RCRA regulatory and statutory requirements. This report and attachments present the results of the inspection.

I inspected the facility as a Large Quantity Generator (LQG), a Used Oil Generator, and a Small Quantity Universal Waste Handler (SQUWH). SRC was last inspected for RCRA compliance on January 21, 2020, by the Missouri Department of Natural Resources.

2.0 PARTICIPANTS

SRC*

Dustin Davenport, General Manager (1.5 years at position/9 years with company)
Anna Kelley, Environmental Engineer (6 years at position/6 years with company)
Tony Christopher, Hazardous Waste Coordinator (13 years at position/15 years with company)
Jim Cody, EHS Manager (not determined)

- * - Business cards for Ms. Kelley and Messrs. Davenport and Cody are provided in Attachment 1. Mr. Christopher did not provide a business card.

3.0 INSPECTION PROCEDURES

I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.1E), unless noted differently. I completed checklists and other inspection related documents and collected photocopies/electronic copies that are included as attachments to this report. I collected photographs using the digital camera application on an iPad.

During the inspection, discussions consisted of the facility operations, wastes generated, and waste management practices. I conducted a visual inspection of hazardous waste management areas.

I collect various documents and records during the inspection. A Receipt for Documents and Samples was prepared and signed by Ms. Kelley (Attachment 2). I presented a Confidentiality Notice to Ms. Kelley during the exit conference. Ms. Kelley signed the Confidentiality Notice claiming that confidential business information had been provided by SRC during the inspection (Attachment 3). I also provided a Notice of Preliminary Findings (NOPF) to Ms. Kelley which she signed as acknowledgement of receipt (Attachment 4). During the inspection, I took a total of 31 photographs using an iPad digital camera application (Attachment 5).

Prior to the inspection, I found and printed a copy from the internet an aerial photograph showing the facility (Attachment 6). During the inspection, I obtained the facility diagrams from SRC (Attachment 7) that were claimed as Confidential Business Information. These facility diagrams are being handled and managed as CBI. I prepared and completed MoDNR inspection and EPA RCRA Contingency Plan checklists (Attachments 8 and 9).

August 20, 2024

At about 8:30 a.m. on August 20, 2024, I arrived at SRC. A drive-by visual observation was completed from North Broadview Place (west side of the facility) and West Junction Street (north side of the facility). No issues were identified from the drive-by visual inspection. The facility was operational with onsite vehicle traffic and full parking lots. I entered the main entrance on the north side of the facility building and asked for Ms. Anna Kelley. The receptionist indicated that Ms. Kelley was teleworking that day, so I met with Mr. Dustin Davenport, SRC General Manager. I introduced myself and stated that the purpose of my visit was to conduct a hazardous waste compliance evaluation inspection. Mr. Davenport led me to his office and indicated that Ms. Kelley would be available for the inspection. Mr. Davenport telephoned Ms. Kelley and requested her to come into the facility for the inspection. I proceeded with the entry briefing with Mr. Davenport. Ms. Kelley arrived at the SRC facility at approximately 9:30 a.m. and participated in the entrance briefing.

I presented my EPA credentials to Mr. Davenport and Ms. Kelley. I referenced RCRA Section 3007 which provides inspection authority. Ms. Kelley provided verbal consent to

proceed with the inspection. I described the importance of collecting accurate information and I presented copies of Title 18 United States Code, Sections 1001 and 1002 to Ms. Kelley and Mr. Davenport, which describe the penalties if false and/or misleading information is provided to Federal representatives, and for the possession and use of fraudulent documents. Ms. Kelley and Mr. Davenport were made aware of SRC's confidentiality rights and informed that a Confidentiality Notice would be provided at the end of the inspection to make a confidential business information (CBI) claim. I provided Ms. Kelley and Mr. Davenport a copy of EPA Region 7's "Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections" and reviewed the information with them. I confirmed that Ms. Kelley would act as the primary facility representative during this inspection.

I explained the purpose, scope, and procedures for the RCRA CEI to Ms. Kelley and Mr. Davenport. At the end of the entry briefing, Mr. Tony Christopher joined our discussion at approximately 10:15 a.m. At approximately 10:30 a.m. following the entrance discussion, I began a visual inspection of the facility. Ms. Kelley and Messrs. Davenport and Christopher accompanied me during the visual inspection.

Following the visual inspection, SRC and EPA personnel reconvened in Mr. Davenport's office to begin the records review. Ms. Kelley indicated that nearly all the requested information was available electronically. Ms. Kelley provided several emails containing the requested information which I reviewed offsite. I departed the facility at approximately 4:30 p.m.

August 21, 2024

On August 21, 2024, I arrived at SRC at 10:00 a.m. and met with Ms. Kelley and Messrs. Davenport, Christopher, and Cody to complete my records review and conduct the exit conference. I reviewed the purpose and scope of the RCRA CEI. I provided Ms. Kelley the Receipt for Documents and Samples which she signed as acknowledgement of receipt. Ms. Kelley signed the Confidentiality Notice which indicated that SRC wanted to claim the three copies showing the facility diagram as CBI. No other information, documents, or photographs were claimed as CBI. I provided Ms. Kelley copies of the Receipt of Documents and Samples (Attachment 2), Confidentiality Notice (Attachment 3), and Notice of Preliminary Findings (Attachment 4). Following the exit conference, I departed the facility.

4.0 FINDINGS AND OBSERVATIONS

4.1 General Information/Facility Description

SRC remanufactures original equipment including engines, turbochargers, hydraulic pumps, engine components, fuel systems, and cooling systems. Mr. Davenport indicated that SRC overhauls rebuilds items to the manufacturer's specifications.

SRC remanufactures approximately 35 diesel engines daily. The diesel engines range in size from 17 horsepower to semi-truck dimensions. Clients include Navistar, Paccar, General Motors, Bobcat, and Sullair. Mr. Davenport reported that SRC will be providing its services to new clients Kobota and JCB soon.

SRC's process steps for engine remanufacturing include:

- receiving engines for remanufacturing from clients
- disassembling engines
- cleaning/washing engines/parts
- soda blasting and/or zinc blasting (Attachment 5, Photographs 1 and 2)
- inspecting each individual component to determine whether a rebuild is possible and/or to determine whether there are any malfunctioning components
- machining engines
- replacing old engine parts with new parts (some old parts may be reclaimed, reused, and/or salvaged if in acceptable condition)
- reassembling engines (six (6) client-specific lines)
- testing engines (short block engines – no testing, long block engines – oil testing only to ensure no leaks, and complete engine – running engine test to ensure engine is performing within specification) – see Attachment 5, Photographs 4, 5, and 6
- some engines are painted following the remanufacturing process as directed by the client.

SRC also remanufactures approximately 150 turbochargers per day through one turbo assembly line. Attachment 5, Photograph 7 shows a turbocharger being processed on the SRC turbo assembly line.

According to Mr. Davenport, the SRC remanufacturing portion of the facility consists of approximately 245,000 square feet (ft²) and the office consists of approximately 10,000 ft². SRC employs approximately 300 employees at this facility. The facility is operated from 4:00 a.m. to 1:30 a.m. with the remanufacturing process work occurring 7:00 a.m. to 3:30 p.m. and maintenance personnel work occurring during the early morning and evening hours.

4.2 RCRA Status

Prior to the inspection, I downloaded several reports from the EPA's RCRAInfo database. The RCRA Site Verification Report (Attachment 10a) indicated that SRC was a LQG of hazardous waste. I reviewed the site verification report with Ms. Kelley who did not identify any updates. SRC's 2023 Comprehensive Biennial Report (Attachment 10b) indicated that the facility generated 108,014 pounds (approximately 54 tons) of hazardous wastes during 2023 which further documented that the facility was a LQG of hazardous waste.

I determined at the time of my inspection that SRC was not currently storing hazardous waste in its designated hazardous waste container accumulation area. I reviewed the information provided in EPA's e-Manifest system (Attachment 11). During my inspection, I reviewed hazardous waste manifests from the facility for the past three years and the facility's waste disposal logs for 2021, 2022, and 2023 (Attachments 12a, 12b, and 12c).

I determined at the time of the inspection that SRC was generating less than 1,000 kilograms of hazardous waste per month, but several times each year, SRC generates greater than 1,000 kilograms of hazardous waste and operates as a LQG as documented in the EPA's e-Manifest

system (Attachment 11). Based on this information, I reviewed SRC for compliance with LQG requirements during my inspection.

4.3 Previous Inspection and Related Information

As previously mentioned, SRC was last inspected for RCRA compliance on January 21, 2020, by the MoDNR. MoDNR documented the findings during its inspection and notified SRC of the following findings via a February 6, 2020, Unsatisfactory Findings – No Response Required Letter:

1. *Title 10 Code of State Regulations (10 C.S.R.) 25-5.262(1) incorporating Title 40 Code of Federal Regulations (40 C.F.R.) 262.11 – Failure to determine if waste is hazardous pursuant to methods referenced in 40 C.F.R. 262.11.
2. *10 C.S.R. 25-5.262(2)(C)3.C. – Failure to ensure each container is marked with its beginning date of satellite storage.
3. *10 C.S.R. 25-5.262(2)(C)3. incorporating 40 C.F.R. 262.34(c)(1)(ii) – Failure to ensure that satellite containers are marked with either the words “Hazardous Waste” or with other words identifying the contents.
4. 10 C.S.R. 25-5.262(1) incorporating 40 C.F.R. 262.34(d)(4) referencing 40 C.F.R. 265.31 – Failure to maintain and operate the facility to minimize the possibility of a fire, explosion or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water which could threaten human health or the environment.
5. 10 C.S.R. 25-16.273(1) incorporating 40 C.F.R. 273.15(a) – Failure to ensure universal waste is accumulated for less than one year from the date generated or received from another handler.
6. 10 C.S.R. 25-16.273(1) incorporating 40 C.F.R. 273.15(b) – Failure to accumulate universal waste for only one year unless able to demonstrate activity is solely for the purpose of accumulating quantities to facilitate proper recovery, treatment, or disposal.
7. 10 C.S.R. 25-16.273(1) incorporating 40 C.F.R. 273.13(d)(1) – Failure to ensure unbroken lamps are stored in closed, non-leaking containers or packages that are structurally sound and adequate to prevent breakage.
8. *10 C.S.R. 25-16.273(1) incorporating 40 C.F.R. 273.14(e) – Failure to ensure that each lamp or lamp container or package is marked or labeled clearly as “Universal Waste Lamp(s)” or “Waste Lamp(s)” or “Used Lamp(s).”

* - This finding was repeated during the EPA’s August 20-21, 2024, RCRA CEI.

4.4 Waste Streams and Waste Management

This section of the CEI report describes the waste streams generated by the facility, including the facility’s waste determination, generation and management processes, and ultimate disposition. The following discussion of waste streams is based on conversations with facility representatives, the visual inspection, and the previously mentioned Waste Disposal Logs for 2021, 2022, and 2023 (Attachments 12a, 12b, and 12c).

ACS 4000 Main Wash/2100 Main Wash Lily Chem (Engine Wash) – SRC cleans engines using a sodium hydroxide wash. This is SRC’s largest wastestream and it has been determined to be a RCRA characteristic hazardous waste based on corrosivity (UN3266, waste corrosive liquid, basic, inorganic, n.o.s. (sodium hydroxide, water) 8, II, RQ (D002)). Approximately 4,000 gallons (approximately 40,000 pounds) are generated in batches every three to four months at the facility from the engine wash process (Attachment 12c) when SRC employees determine it needs changed out. The facility pumps the spent engine wash process liquid from tanks located beneath the engine wash processing areas to a 4,000-gallon aboveground hazardous waste storage tank located on the east side of the building inside of a secondary containment structure (Attachment 5, Photographs 19 and 20). At the time of the inspection, there was no hazardous waste stored inside this tank. SRC was conducting the required inspections of its aboveground hazardous waste storage tank, and it was labeled with the words, “Hazardous Waste”; however, the photograph (Attachment 5, Photograph 19) that I took was not of sufficient quality to observe the required labeling. The engine wash waste is stored in the aboveground hazardous waste storage tank for only a few days before it is picked up by Basin Transportation (RCRA ID No. OKR000031492) and transported to Envirite of Illinois, Inc. (RCRA ID No. ILD000666206) for disposal.

Cleaning Engines (Sludge Satellite Main Wash) Lily Chem – SRC generates and collects a sludge during the main engine cleaning wash. SRC collects this sludge into a satellite accumulation container in the main wash area (Attachment 5, Photographs 22 and 23). SRC has determined this sludge to be a RCRA characteristic hazardous waste based on its corrosivity (UN3266 waste corrosive liquid, basic, inorganic, n.o.s., (sodium hydroxide, water), 8, II, RQ (D002)). During 2023, SRC generated approximately 426 pounds of this hazardous waste (Attachment 12c). The sludge is transported offsite by Veolia Technical Solutions, Flanders, New Jersey (RCRA ID No. NJD080631369) to Veolia ES Technical Solutions, Menomonee Falls, Wisconsin (RCRA ID No. WID003967148).

Filtering Water for Engine Cleaning Process (ACS 4000) – SRC generates and collects a filtering water (a.k.a., “top oily sludge”) during the main engine cleaning wash which is a mixture of sodium hydroxide and water. The ACS 4000 tank washes the used engine parts prior to the remanufacturing process. SRC collects this filtering water into a satellite accumulation container in the main wash area (Attachment 5, Photographs 22 and 24). SRC has determined the filtering water to be a RCRA characteristic hazardous waste based on its corrosivity (D002). During 2023, SRC generated approximately 426 pounds of this hazardous waste (Attachment 12c).

K-Factor Filter Paper – SRC generates the K-Factor filter paper during the process of skimming the previously discussed ACS 4000 wash tank. The top of the washwater runs over the K-Factor filter paper, capturing the oil and allowing the washwater (which contains the cleaning chemical) to flow back into the ACS 4000 tank. As the K-Factor filter paper becomes saturated with caustic washwater and oily waste, it is advanced and the wastepaper is removed to the satellite drum located near the main wash area (Attachment 5, Photographs 25 and 26). The K-Factor filter paper is not combined with any other facility waste streams. SRC has determined that the K-Factor filter paper wastestream is a RCRA characteristic hazardous waste for lead (D008) based on analyses. According to Ms. Kelley, SRC generates approximately 500 pounds

of the K-Factor filter paper waste stream each year (Attachments 12a, 12b, and 12c). This wastestream is transported offsite by Veolia ES Technical Solutions NJD080631369, 1 Eden Lane, Flanders, New Jersey 07836 (RCRA ID No. NJD080631369) to Veolia ES Technical Solutions, W124 N9451 Boundary, Menomonee Falls, Wisconsin 53051 (RCRA ID No. WID003967148).

Aerosol Can Waste Liquids – SRC generates aerosol can waste liquids at the facility. These liquid wastes are generated from aerosol cans that are not completely emptied. The aerosol cans are collected in a satellite accumulation container near the aerosol paint storage area and then taken to the SRC Waste Treatment Area where the cans are punctured and the waste liquids are collected for disposal (Attachment 5, Photographs 13, 16, and 17). SRC has determined the aerosol can waste liquids to be RCRA listed (F003, F005) and RCRA characteristic (D001, D005, D006, D007) hazardous waste. During 2023, SRC generated approximately 30 pounds of this hazardous waste (Attachment 12c). This wastestream is transported offsite by Safety-Kleen Systems Inc. (RCRA ID No. TXR000081205) to Safety-Kleen Systems Inc., Smithfield, Kentucky (RCRA ID No. KYD053348108).

Waste Paint – Waste paint liquids are generated from paint gun cleaning at the end of the shift from the engine painting process at SRC. The waste paints are collected in a satellite accumulation area container located near the engine assembly line (Attachment 5, Photograph 21). SRC has determined that the waste paint wastestream is a RCRA characteristic hazardous waste (D001, D005, D006, D007, D008, and D011). During 2023, SRC generated approximately 304 pounds of this hazardous waste (Attachment 12c). This wastestream is transported offsite by Veolia Technical Solutions (RCRA ID No. NJD080631369) to Veolia ES Technical Solutions, Menomonee Falls, Wisconsin (RCRA ID No. WID003967148).

Used Oil – SRC generates used oil from its engine remanufacturing and testing processes. Many engines that are sent to the plant contain some amount of used oil which is removed and collected during the disassembly process. The used oil is collected in 55-gallon containers and an aboveground storage tank (Attachment 5, Photographs 19 and 31). Used oil is also generated during engine testing in the dyno area. This used oil is pumped to a separator tank. The used oil is separated off the top and sent to the used oil tank. Used oil filters generated during facility processes are crushed and recycled as scrap metal. The used oil removed from the used oil filters is stored in the used oil storage tank. Used oil absorbents (i.e., mats (Attachment 5, Photograph 3), pigs, “kitty litter,” etc.) are also generated at SRC. Closed Loop Recycling LLC, 5555 Manchester Avenue, St. Louis, Missouri 36110 picks up and processes these absorbents. Ms. Kelley indicated that Closed Loop Recycling is an industrial laundering facility and is exempt from needing an EPA ID number as they do not accept hazardous wastes at their facility, nor do they generate hazardous wastes from their processes. According to SRC’s Used Oil Generation Log approximately 38,715 gallons of used oil were generated at the facility between March 2023 and July 2024 (Attachment 13). Based on this amount, SRC was generating approximately 2,275 gallons of used oil liquids each month. The used oil generated at the facility is transported offsite by Safety-Kleen Systems Inc., 1722 Cooper Creek Road, Suite 100, Denton, Texas 76208 (RCRA ID No. TXR000081205) to Safety-Kleen Systems, Inc., 734 Northwest Bypass 66, Springfield, Missouri 65802 (RCRA ID No. MOD000669069). Attachment 8 includes a MoDNR

Used Oil Attachment checklist that was completed during the inspection. I did not observe any used oil violations during the inspection.

Soda and Zinc Blasting Waste

Soda and zinc blasting is performed to thoroughly clean engine parts used in the SRC remanufacturing operations. Based on Toxicity Characteristic Leaching Procedure results performed on the blasting waste (Attachment 24), the blasting waste is nonhazardous, and it is disposed with the general trash (discussed below).

Scrap Metal – Scrap metal is generated during the remanufacturing processes performed at the SRC facility. The amount of scrap metal varies depending on fallout of usable/unusable used engine cores. However, an average of 400,000 pounds of scrap metal is generated per month and placed onto trailers for pick up. Global Recovery Corp, 2401 East Sunshine Street, Springfield, Missouri 65804 picks up the accumulated scrap metal contained on the trailers weekly for recycling.

General Trash – SRC generates general trash (i.e., office waste, plastic, etc.) which is transported offsite bi-weekly by Green For Life (GFL) Environmental, Springfield Hauling, 26777 Central Park Boulevard, Suite 255, Southfield, Michigan 48076. Wooden pallets are crushed daily and disposed as needed by GFL Environmental. Cardboard generated at the site is picked up as needed by GFL Environmental for recycling.

4.5 Visual Site Inspection

Ms. Kelley and Messrs. Davenport and Christopher accompanied me during my visual inspection of the SRC facility that was conducted during the first day of my inspection visit (August 20, 2024). I observed the processing areas discussed above in Section 4.1 of this report as well as the following areas during my visual inspection:

- parts and equipment storage areas
- wastewater mop bucket stations – I observed one of two wastewater mop bucket stations used to dump wastewater that is pumped to the Waste Treatment Area for processing through the filter press (Attachment 5, Photograph 27). The wastewater mop bucket station was observed near the engine wash area.
- waste treatment area (see Section 4.6)
- hazardous waste container accumulation area (see Section 4.7)
- satellite accumulation areas (see Section 4.8)
- Universal Waste storage areas (see Section 4.9)

4.6 Waste Treatment Area

I visually inspected the Waste Treatment Area during the inspection. The Waste Treatment Area was in the northeastern portion of the SRC facility's building.

I observed SRC's filter press and two (2), 1-cubic yard cardboard containers of filter press (a.k.a., "filter cake") waste (Attachment 5, Photographs 8, 9, and 10) inside of the Waste Treatment Area. SRC provided the results of the Toxicity Characteristic Leaching Procedure analytical testing of the SRC filter cake waste which documents that this wastestream is nonhazardous (Attachment 14). I observed no apparent issues or findings related to this wastestream.

I observed several 275-gallon wastewater intermediate bulk containers (i.e., "IBCs" or "totes") located inside of the Waste Treatment Area (Attachment 5, Photographs 10 and 11). The IBCs were labeled with the words, "Hazardous Wastes" and were properly dated. I observed no apparent issues or findings related to this wastestream.

I observed seven (7) five-gallon containers of Three Bond Silicon Type Liquid Gasket (Attachment 5, Photograph 18) inside of a secondary containment structure in the Waste Treatment Area. I asked Mr. Christopher the status of these containers. Mr. Christopher indicated that the contents of these containers were outdated and that SRC considered the container contents to be wastes. He said that SRC would open the containers to allow their contents to harden before disposing the seven containers into the general trash. I reviewed the label and the Safety Data Sheets for the Three Bond Silicon Type Liquid Gasket (Attachment 15) and determined that the listed product flashpoint was 25° Celsius. Therefore, the Three Bond Silicon Type Liquid Gasket waste would be a RCRA characteristic waste for ignitability (D001) since the flashpoint was less than 60° Celsius, based on the label and SDS. I determined that SRC had failed to conduct a hazardous waste determination on the seven (7) containers of Three Bond waste that were stored in the Waste Management Area of the facility (**NOPF 1: 10 C.S.R. 25-5.262(1) incorporating 40 C.F.R. 262.11 – Failure to conduct a hazardous waste determination**). These containers were in good condition, closed, and labeled with the nature of the hazard, but not labeled as "Hazardous Waste" and not dated at the time of the CEI.

4.7 Hazardous Waste Container Storage

I observed SRC's designated hazardous waste container storage area located inside of the Chemical Storage Building near the northeast corner of the property. At the time of the inspection, SRC was not storing any hazardous waste inside of this hazardous waste container storage area (Attachment 5, Photograph 15). Based on my observations, there were no apparent issues or findings related to SRC's designated hazardous waste storage area.

4.8 Satellite Accumulation in Containers

During the SRC inspection, I observed satellite accumulation areas for paint wastes, engine wash sludge, engine wash top oily sludge, K-Factor filter paper, aerosol cans, and the aerosol can puncture device. Ms. Kelley indicated that SRC follows MoDNR Option 2 (see 10 CSR 25-5.262(2)(C)3) for its satellite accumulation areas. Mr. Davenport explained that during one of the previous hazardous waste inspections, the MoDNR inspector indicated that the facility could have only one satellite accumulation container for each wastestream within the entire SRC facility. I explained that a generator facility may have multiple satellite accumulation areas for the same wastestream at a facility if the specific requirements for each satellite accumulation

area/container were met. I provided compliance assistance information regarding these requirements to Ms. Kelley.

I observed that the satellite accumulation area containers for paint wastes, engine wash sludge, engine waste top oily sludge, and K-Factor filter paper were compliant with RCRA requirements (Attachment 5, Photographs 21 through 26).

I observed a steel, beige-colored 55-gallon container outside of the aerosol paint storage area that was labeled as “Empty Aerosol Cans Collection Point” and used to collect aerosol cans to be punctured. SRC believed that this 55-gallon container was a satellite accumulation area container (Attachment 5, Photographs 13 and 14). I picked up several of the aerosol cans within this 55-gallon container and determined that the cans did not meet the “RCRA empty” requirement. I observed that these aerosol cans contained liquids that were highly volatile with low flashpoints. I requested and reviewed copies of several Safety Data Sheets for the aerosol paint cans that I observed inside of this container (Attachments 16 and 17). My SDS reviews confirmed that these aerosol cans contained a RCRA characteristic hazardous waste liquids that would be ignitable (D001). Therefore, this container of hazardous waste was not labeled or marked with the words, “Hazardous Waste” (**NOPF 4: 10 C.S.R. 25-5.262(2)(C)3. incorporating 40 C.F.R. 262.34(c)(1)(ii) – Failure to mark a satellite accumulation area container with the words, “Hazardous Waste”**), it did not provide the start date of accumulation (**NOPF 3: 10 C.S.R. 25-5.262(2)(C)3.C. – Failure to mark a satellite accumulation area container with the beginning date of satellite storage**), and it was not properly closed (**NOPF 5: 10 C.S.R. 25-5.262(1) incorporating 40 C.F.R. 262.34(c)(1)(i) referencing 40 C.F.R. 265.173(a) – Failure to close a satellite accumulation area container during storage except when adding or removing waste**). Based on the MoDNR Large Quantity Generator checklist (Attachment 8), I also determined that this container was not labeled in accordance with the United States Department of Transportation requirements and included this finding in the NOPF (**NOPF 2: 10 C.S.R. 25-5.262(2)(C)1.A. & B. – Failure to label satellite accumulation area containers per the United States Department of Transportation which identify the hazards**). However, following the inspection, I consulted Brandon Backus, Environmental Program Supervisor for the MoDNR’s Compliance and Enforcement Section of the Waste Management Program, concerning this citation (Attachment 25). Mr. Backus indicated that the citation was “not applicable in Missouri at this time” and that the MoDNR was currently in the process of updating their inspection checklists. Based on the information provided by Mr. Backus, NOPF 2 has been rescinded.

I observed the SRC aerosol can puncturing device/container satellite accumulation area inside of the Waste Treatment Area (Attachment 5, Photographs 16 and 17). This container was in good condition, closed, labeled with the words, “Hazardous Waste,” and dated 2/16/2024, but provided no United States Department of Transportation labeling (**NOPF 2: 10 C.S.R. 25-5.262(2)(C)1.A. & B. – Failure to label satellite accumulation area containers per the United States Department of Transportation which identify the hazards**). As previously noted, NOPF 2 has been rescinded.

4.9 Universal Wastes

I observed two (2) five-gallon containers of Universal Waste – Batteries outside of the aerosol paint storage area (Attachment 5, Photograph 12). These containers were closed, labeled, and dated (1-15-2024). Based on my observations, there were no apparent issues or findings related to SRC's Universal Waste – Batteries.

Upstairs within SRC's maintenance shop, I observed a used lamp storage container (Attachment 5, Photographs 28 and 29). The used lamp container was closed and dated "5/28-24" but not labeled correctly (labeled as "Used Light Bulbs") at the time of the inspection (**NOPF 9: 10 C.S.R. 25-16.273(1) incorporating 40 C.F.R. 273.14(e) – Failure to label a universal waste storage container with one of the following phrases: "Universal Waste – Lamp(s)," "Waste Lamp(s)," or "Used Lamp(s)".** Following the discovery of the improperly labeled box, Mr. Christopher correctly labeled the box labeling with the words, "Used Lamps" (Attachment 5, Photograph 30).

During my records review, I reviewed the facility's universal waste invoices (Attachment 20). Based on my review, there were no apparent issues or findings related to the universal waste invoices which documented the shipment of these wastes.

4.10 Inspections

Ms. Kelley provided electronic copies of SRC's Chemical and Waste Storage Inspection Sheets and the Hazardous Waste Storage Inspection Checklists for the 2021, 2022, 2023, and 2024 calendar years (Attachments 18a, 18b, 18c, 18d, 19a, 19b, 19c, and 19d). I reviewed the provided inspection documents. I observed no apparent issues or findings related to my review of these inspection records.

4.11 Contingency Plan

During my records review, I requested a copy of the current SRC Emergency Action and Contingency Plan (Attachment 21) which was provided by Ms. Kelley electronically. The plan included required items such as emergency contacts, evacuation routes (for the older portion of the building), and list and locations of emergency equipment (for the older portion of the building). The plan described the actions to take in response to a fire, explosion, or release of hazardous waste. The SRC RCRA Contingency Plan failed to provide the equipment locations for the SRC's "new building" (**NOPF 7: 10 C.S.R. 25-5.262(1) incorporating 40 C.F.R. 262.34(a)(4) referencing 40 C.F.R. 265.52(e) – Failure to provide equipment locations shown in the Contingency Plan diagram of the "new building"**) and failed to provide the evacuation routes and alternate routes for the "new building" (**NOPF 8: 10 C.S.R. 25-5.262(1) incorporating 40 C.F.R. 262.34(a)(4) referencing 40 C.F.R. 265.52(f) – Failure to provide evacuation routes and alternate routes for the "new building" in the Contingency Plan**). I asked Ms. Kelley whether the SRC Emergency Action and Contingency Plan had been submitted to all local police departments, fire departments, hospitals, and state and local emergency response teams called to provide emergency services. Ms. Kelley said that SRC had not provided the SRC Emergency Action and Contingency Plan to these organizations as required (**NOPF 6:**

10 C.S.R. 25-5.262(1) incorporating 40 C.F.R. 262.34(a)(4) referencing 40 C.F.R. 265.53(b) – Failure to submit the Contingency Plan to all local police departments, fire departments, hospitals, and state and local emergency response teams called to provide emergency services).

4.12 Job Descriptions/Training Requirements

During my records review, I requested and received copies of the SRC's job descriptions along with names of employees filling the jobs (Attachment 22). I observed no apparent issues or findings related to review of the facility job descriptions with the names of the employees filling the jobs.

Ms. Kelley also provided electronic copies of the training records for SRC employees for the past five (5) years (Attachment 23). The records did not provide documentation for RCRA training conducted during 2019 and 2020; however, the training records appeared complete for the 2021, 2022, 2023, and 2024 calendar years. Therefore, I observed no other apparent issues or findings related to review of the facility's training records.

4.13 Manifests

During the inspection, I reviewed copies of hazardous waste manifests for the past three years. I observed no apparent issues or findings related to my review of the hazardous waste manifests.

5.0 COMPLIANCE ASSISTANCE

I provided the following compliance assistance materials to Ms. Kelley during the RCRA CEI:

United States Code 1001/1002 Annotated (EPA Handout)
EPA Section 3007 Inspections Sheet (EPA Handout)
EPA Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections (EPA Handout)
EPA Responding to a NOPF (EPA Handout)

As requested, I sent Ms. Kelley electronic copies of the following compliance assistance materials via email on August 21, 2024:

EPA Chemical Facility Anti-Terrorism Standards (Homeland Security Handout)
EPA e-Manifest Fact Sheet – Generators (EPA Handout)
EPA Environmental Compliance Assistance Centers (EPA Handout)
EPA Industry Sector Notebooks (EPA Handout)
EPA Instructions for Responding to a NOPF (EPA Handout)
EPA Managing Used Oil Advice (EPA Handout)
EPA Managing Your Hazardous Waste (EPA Handout)
EPA Method for Determining the Compatibility of Hazardous Waste (EPA Handout)
EPA R7 Emergency Response Program (EPA Handout)
EPA RCRA Compliance Evaluation Inspection (CEI) (EPA Handout)

EPA RCRA Facility Access Information Sheet (EPA Handout)
EPA RCRA Online: A Quick Reference Guide (EPA Handout)
EPA Security Awareness (EPA Handout)
EPA Small Business Resources Information Sheet (EPA Handout)
EPA Contingency Plan Checklist
MoDNR Inspection Checklists (from the MoDNR website)
MoDNR Aerosol Cans – PUB1084
MoDNR Antifreeze Waste Management Guide – PUB0114
MoDNR Environmental Regulations for Paint Removal – PUB0118
MoDNR Handbook for SQGs – PUB2174
MoDNR Hazardous Waste Generator Status Guidance – PUB2224
MoDNR Hazardous Waste Generator Registration, Reporting and Waste Fees – PUB2254
MoDNR Hazardous Waste Satellite Accumulation – PUB2215
MoDNR Managing Conditionally Exempt Small Quantity Generators of Hazardous Waste – PUB0128
MoDNR Managing Gasoline Dispenser Fuel Filters and Wastes – PUB2364
MoDNR Missouri Commercial Hazardous Waste Facilities – PUB0968
MoDNR Recycling of Used Cathode Ray Tubes – PUB2580
MoDNR Universal Waste Rule in Missouri – PUB2058
MoDNR Used Oil Collection Centers and Aggregation – PUB0136
MoDNR Used Oil Contaminated Waste – PUB0153
MoDNR Used Oil Generators and Burners – PUB0134
MoDNR Used Oil Processors, Re-Refiners and Marketers – PUB0154
MoDNR Used Oil Transporter – PUB0132

6.0 SUMMARY

I conducted an inspection of SRC as a RCRA large quantity generator of hazardous waste, a used oil generator, and a small quantity handler of universal waste. Hazardous waste requirements reviewed during this inspection are discussed above and are documented on bound field notes.

The following preliminary findings/issues were noted as discussed above:

1. 10 C.S.R. 25-5.262(1) incorporating 40 C.F.R. 262.11 – Failure to conduct a hazardous waste determination on seven (7) containers of ThreeBond waste that were stored in the Waste Management Area of the facility.
2. *10 C.S.R. 25-5.262(2)(C)1.A. & B. – Failure to label satellite accumulation area containers (aerosol can satellite accumulation area container and aerosol can puncturing satellite accumulation area container) per the United States Department of Transportation which identify the hazards.
3. 10 C.S.R. 25-5.262(2)(C)3.C. – Failure to mark the aerosol can satellite accumulation area container with the beginning date of satellite storage.
4. 10 C.S.R. 25-5.262(2)(C)3. Incorporation 40 C.F.R. 262.34(c)(1)(ii) – Failure to mark the aerosol can satellite accumulation area container with the words, “Hazardous Waste.”
5. 10 C.S.R. 25-5.262(1) incorporating 40 C.F.R. 262.34(c)(1)(i) referencing 40 C.F.R. 265.173(a) – Failure to close a satellite accumulation area container during storage

except when adding or removing waste (aerosol can satellite accumulation area container).

6. 10 C.S.R. 25-5.262(1) incorporating 40 C.F.R. 262.34(a)(4) referencing 40 C.F.R. 265.53(b) – Failure to submit the Contingency Plan to all local police departments, fire departments, hospitals, and state and local emergency response teams called to provide emergency services.
7. 10 C.S.R. 25-5.262(1) incorporating 40 C.F.R. 262.34(a)(4) referencing 40 C.F.R. 265.52(e) – Failure to provide equipment locations shown in the Contingency Plan diagram of the “new building.”
8. 10 C.S.R. 25-5.262(1) incorporating 40 C.F.R. 262.34(a)(4) referencing 40 C.F.R. 265.52(f) – Failure to provide evacuation routes and alternate routes for the “new building” in the Contingency Plan.
9. 10 C.S.R. 25-16.273(1) incorporating 40 C.F.R. 273.14(e) – Failure to label a universal waste storage container with one of the following phrases: “Universal Waste – Lamp(s),” “Waste Lamp(s),” or “Used Lamp(s).”

* - Upon further review, this finding has been rescinded.

Other than the items noted above, no other apparent preliminary findings were observed or cited. However, EPA post-inspection review of this report may change or add to my findings.

KEVIN
SNOWDEN

Digitally signed by KEVIN
SNOWDEN
Date: 2024.12.13
09:49:56 -06'00'

Date: _____

Kevin D. Snowden
Environmental Scientist

AMBER WHISNANT

Digitally signed by
AMBER WHISNANT
Date: 2025.02.04
22:21:35 -06'00'

Date: _____

Amber Whisnant
Chief, RCRA Section, Chemical Branch
Enforcement and Compliance Assistance Division

Attachments

1. SRC Business Cards (2 pages)
2. Receipt for Documents and Samples (1 page)
3. Confidentiality Notice (1 page)
4. Notice of Preliminary Findings (2 pages)
5. Digital Image Log (34 pages)
6. SRC Aerial Photograph (1 page)
7. SRC Facility Diagrams (3 pages) – *claimed as Confidential Business Information*
8. MoDNR Checklists for SRC Inspection (18 pages)
9. Contingency Plan Checklist (1 page)
10. RCRAInfo Database Reports (Attachment 10a – Notification Acknowledgement/Verification Report (1 page) and 2023 Comprehensive Biennial Report (6 pages))

11. Manifest Inspectors Report for SRC (10 pages)
12. Excel Spreadsheet showing SRC Waste Disposal Logs (Attachment 12a – 2021 (1 page); Attachment 12b – 2022 (1 page); and Attachment 12c – 2023 (1 page))
13. Used Oil Generation Log for March 2023 through July 2024 (1 page)
14. Filter Cake 2019 PDC Lab Results (5 pages)
15. Safety Data Sheet for Three Bond (4 pages)
16. Safety Data Sheet for Rust-oleum Corporation IC +SSPR 6PK GLOSS SMOKE GRAY (6 pages)
17. Safety Data Sheet for RUST TOUGH® Rust Preventive Enamel (aerosol) (18 pages)
18. SRC Chemical and Waste Storage Inspection Sheets (Attachment 18a – 2021 (108 pages); Attachment 18b – 2022 (262 pages); Attachment 18c – 2023 (252 pages); and Attachment 18d – 2024 (168 pages))
19. SRC Hazardous Waste Storage Area Inspection Checklists (Attachment 19a – 2021 (52 pages), Attachment 19b – 2022 (52 pages), Attachment 19c – 2023 (51 pages), and Attachment 19d – 2024 (32 pages))
20. Universal Waste Invoices (9 pages)
21. Emergency Action and Contingency Plan (56 pages)
22. SRC Employee Names, Positions, and Job Descriptions (13 pages)
23. SRC Training Records (38 pages)
24. 2023 TCLP Analytical Report (16 pages)
25. December 12, 2024, Email from Brandon Backus, MoDNR, regarding inaccurate citation (2 pages)