

REGION 10 Enforcement Division

INSPECTION REPORT

Inspection Date(s):	08/31/2021 - 08/31/2021	Announced: No	
Time:	Entry: 09:25 AM (PT)	Exit: 04:00 PM (PT)	
Program:	RCRA		
Regulatory Program(s):	Title 40 - ENVIRONMENTAL PROTECTION AGENCY; WASHINGTON STATE REGULATIONS		
Company Name:	CRANE CO		
Facility or Site Name:	ELDEC CORP MARTHA LAKE		
Facility/Site Physical Address:	16700 13TH AVE W		
(City, state, zip code)	LYNNWOOD, WA 98037		
Type of Operation:	Aerospace Electronic Manufacturing		
Size of Facility:	29 acres 212000 sq ft		
Length of Facility at Location:	1967		
Geographic Coordinates:	47.846748, -122.253655		
Mailing address: (Secondary Address)	Mr. Brian Anderson Manager Facilities Engineering & Environmental 16700 13 th Ave W Lynnwood, WA 98037 brian.anderson@craneae.com cc: Ms. Barbara Anderson, Sr EHS Manager barbara.anderson@craneae.com		
(City, state, zip code)	Lynnwood, WA 98037		
County:	Snohomish		
Facility/Site Identifier:	WAD009251042		
Media Number:	N/A		
NAICS:	334418 – Printed Circuit Assembly Manufacturing		
Lead Inspector:			
Katie Bradshaw	KATRINA BRADSHAW	Digitally signed by KATRINA BRADSHAW Date: 2021.11.03 16:36:10 -07'00'	
	REGION 10	bradshaw.katrina@epa.gov	(206) 553-6318
Additional Participants:			
Jon Jones	REGION 10	Jones.Jon@epa.gov	(907) 271-6329
Supervisor Review:			
Jen Sullivan	Jennifer A Sullivan	Digitally signed by Jennifer A Sullivan Date: 2021.11.04 14:25:55 -07'00'	
	REGION 10	Sullivan.Jennifer.A@epa.gov	(206) 553-6978

SECTION I – INTRODUCTION**Purpose of the Inspection/Objective**

Type of inspection: FCI - Focused Compliance Inspection. This was a Resource Conservation and Recovery Act (RCRA) inspection conducted pursuant to Washington's federally authorized RCRA program. The facility was inspected to evaluate compliance with the organic air emissions standards found in 40 CFR Part 265, Subparts AA, BB, and CC, as incorporated by reference into the Washington Administrative Code (WAC) at 173-303-400. The inspection was conducted as part of the EPA National Compliance Initiative for organic emissions from RCRA facilities.

Attendees

Title	Name	Phone	Email	Present in Opening Conf.	Present in Closing Conf.
Lead Inspector	Katie Bradshaw	2065536318	bradshaw.katrina@epa.gov	Yes	Yes
Inspector	Jon Jones	(907) 271-6329	Jones.Jon@epa.gov	Yes	Yes
Sr EHS Manager	Barbara Anderson	(425) 743-8693	barbara.anderson@craneae.com	Yes	Yes
Manager, facilities, engineering & environmental	Brian Anderson	(425) 308-4841	brian.anderson@craneae.com	Yes	Yes

Opening Conference

EPA Lead Inspector Katie Bradshaw and EPA Inspector Jon Jones arrived at the Eldec Corp Martha Lake facility (Eldec or facility) at 09:25 AM (PT) on 08/31/2021 for an inspection. We presented our credentials to Brian Anderson and Barbara Anderson and informed them that this was an EPA RCRA Focused Compliance Inspection. The table above presents all the inspection participants.

During the inspection we looked at the facility's processes, in addition to hazardous waste management practices, generation points, and accumulation areas. We looked for wastes that facility representatives had not yet identified or designated as hazardous.

Only those areas in which we observed areas of concern or noted other pertinent issues are discussed in this inspection report.

We were accompanied for the entirety of the inspection by Brian Anderson and Barbara Anderson.

Facility/Site Description

The Legal Owner is listed in RCRAInfo as Crane Co, at 100 First Stamford Pl, Stamford, CT 06902. The Legal Operator is listed as Eldec Corp, at 16700 13th Ave W, Lynnwood, WA 98037. Additional information can be found on the facility's website at <https://www.craneae.com/>.

Facility Info

What type of generator facility verified as?	Large Quantity Generator (LQG) verified by Brian Anderson
What type of generator facility notified?	LQG
Safety Training Provided to Inspector(s)?	Yes, oxygen deficiency monitors.
Operating Hours	24/7, 1st and 2nd shift, skeleton 3 rd shift.
Weather Conditions	Cloudy, 50s
Number of employees	850

Process Description

Aviation fuel is pumped through meters to test aerospace manufacturing equipment. There is a skid with a pump and heating system, which pressurizes the fuel. Some fuel that is tested undergoes a viscosity change, and then is pumped out to a 500-gallon tank. This fuel is sent a couple times a year to a TSD facility as usable product. The facility does not perform testing or emissions on the tank. The tank is ambient, and has a Nitrogen blanket.

Organic hazardous waste includes liquid waste collected into 55-gallon DOT containers from aqueous cleaning units, saponifiers, and some solvent parts cleaning units. The facility also has a stencil wash system, which is not characterized as hazardous waste. There were also smaller lab pack drums containing organic hazardous waste in the Central Accumulation Area.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Bldg 1	Downstairs primarily sensor manufacturing and clean rooms, power and space, some warranty repair work	No
Magnetics	Solvent cleaning	No

Bldg 2	Upstairs cafeteria, downstairs assembly area, vibe system	No
PTP assembly	Vapor degreasing	No
Bldg 2A	Shipping/receiving	No
Bldg 3	Engineering upstairs, R&D work, downstairs manufacturing	No
AEP	Vapor degreasing	No
APP	Vapor degreasing	No
PCC	Vapor degreasing	No
Spray cleaning area		No
Bldg 3 tank	Varnish, coating gets dunked and baked off, once a year Clean earth pumps it out. 25 gallons.	No
Bldg 4	Fuel flow transmitter test facility. Raise temp of fuel, testing done about 175 degrees up to 250, closed loop system. Uncouple hose, some emissions of Jet A vapor, nitrogen.	Yes
Fuel flow transmitter testing	Flow leakage in a hazardous waste satellite containers. Jet A gets emptied daily into a 55-gallon container, but the satellite container does not have a closure device and is an open container.	Yes
Fuelflow systems 2	This is a difficult to monitor tank that is visually monitored for leaks weekly. There is also a sensor on the platform for liquid leak detection.	Yes
Chemical storage	CAA	No
Tank Farm		No

SECTION II – OBSERVATIONS AND RECORDS REVIEW

Observations

Building: Bldg 4/Fuel flow transmitter testing	Contains CBI: No
Observation #: KB1-OB-003	Date: 08/31/2021
I observed six, approximately 5-gallon satellite receiver containers, labeled "Hazardous Waste," with funnels open to atmosphere. Each flow leakage container receives any overflow or leakage of jet A fuel from the testing hose when disconnected. The satellite receiver containers are emptied daily into a 55-gallon container.	
Photo(s) 1. Observation Image-202108311115091591221993.jpg	

Building: Bldg 4/Fuel flow transmitter testing/Fuelflow systems 2	Contains CBI: No
Observation #: KB1-OB-004	Date: 08/31/2021
Fuel condensation tank. Visual monitored for leaks weekly. Sensor to detect amount. If managed as hazardous waste, this tank requires leak detection and repair processes per Subpart CC requirements. On November 2, 2021 I sent an email to Brian Anderson asking if the fuel condensation tank contains hazardous waste. He replied the same day stating that the tank contains used Jet A fuel, which flows back to the tank farm area and is product, not hazardous waste.	
Photo(s) 1. Observation Image-2021083111221622161412476.jpg	

SECTION III – AREAS OF CONCERN

The presentation of areas of concern does not constitute a formal compliance determination or violation.

Building: Bldg 4	Area: Fuel flow transmitter testing	Sub-area:
KB1-OB-003		
Six flow leakage satellite containers do not have closure devices (open containers).	Citations:	Sections:

Closing Conference

I thanked everyone for their time and cooperation during the inspection and began a review of the areas of concern that I observed during my walk-through inspection of the facility. I answered any questions they had and explained the follow-up process that would take place after the inspection.

I requested the following documents to be sent via email:

- site drawing showing locations of tanks and hazardous waste central accumulation area
- waste profiles with 10% or more organic content
- air permits x 3
- emissions report for degreasers and spray booths

I received all documents on September 9, 2021, which are included in the Documents section attached to this report.

SECTION IV – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS – No sampling was conducted.

SECTION V – LIST OF APPENDICES**Photo Log**

Observation_Image- 202108311115091591221993.jpg	
08/31/2021 11:15 AM (PT)	
Katie Bradshaw	
Bldg 4/Fuel flow transmitter testing	
No CBI	
No PII	
View of flow leakage container satellite jet A gets emptied daily into 55gallon drum. Does not have closure (open container).	
Observation_Image- 2021083111221622161412476.jpg	
08/31/2021 11:22 AM (PT)	
Katie Bradshaw	
Fuel flow transmitter testing/Fuelflow systems 2	
No CBI	
No PII	
Fuel condensation tank. Visual monitored for leaks weekly. Sensor to detect amount.	

Document Log

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Records Review	ML-SITE-M Model (1).pdf	No	No	Katie Bradshaw	09/09/2021
Records Review	093282.pdf	No	No	Katie Bradshaw	09/09/2021
Records Review	534676.pdf	No	No	Katie Bradshaw	09/09/2021
Records Review	824864.pdf	No	No	Katie Bradshaw	09/09/2021
Records Review	937186.pdf	No	No	Katie Bradshaw	09/09/2021
Other - SDS	556822-01.pdf NOVEC 72DA.pdf	No	No	Katie Bradshaw	09/09/2021
Other Media Program Permits	ELDEC NOC 10953.pdf	No	No	Katie Bradshaw	09/09/2021
Other Media Program Permits	NOC 10837.pdf	No	No	Katie Bradshaw	09/09/2021
Other Media Program Permits	NOC 120040 Forward Cleaner, signed copy from .pdf	No	No	Katie Bradshaw	09/09/2021
Other - Air Emissions Summary Vapor Degreaser	May 2021 Vapor Degreaser Emissions Summary-Wit.pdf	No	No	Katie Bradshaw	09/09/2021
Communications	ELDEC Corporation, Requested information 1.pdf	No	No	Katie Bradshaw	09/09/2021
Inspection Reports	Field_Notes_WAD009251042v1.0.pdf	No	No	Katie Bradshaw	09/09/2021