

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

AT

LAKE CITY ARMY AMMUNITION PLANT

25201 East 78 Highway
Independence, Missouri 64056
(816) 796-5213

RCRA EPA ID Number: MO4213820489

ON

September 24 – 25, 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/Chemical Branch/RCRA Section (ECAD/CB/RCRA) of the U.S. Environmental Protection Agency (EPA) Region 7, I conducted a compliance evaluation inspection (CEI) at the Lake City Army Ammunition Plant (LCAAP) located in Independence, Missouri, on September 24 – 25, 2024. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act, as amended. During the CEI, I collected information and data necessary to determine compliance with the applicable regulatory and statutory requirements. This report and attachments present the results of the inspection. Based on information obtained prior to and during the inspection, I inspected the site as a Permitted Treatment, Storage, and Disposal (TSD) facility, a Large Quantity Generator (LQG) of Hazardous Waste, a Small Quantity Handler of Universal Waste, and a Generator of Used Oil. The facility was last inspected for RCRA compliance by the EPA on September 27 and 28, 2023. The inspection included an EPA focused air compliance inspection for the on-site explosive waste incinerator (EWI) located at the facility by Ms. Charlotte Papp on September 24, 2024. Ms. Papp is an Enforcement Officer/Inspector for R7 EPA (ECAD–Air Branch), and her findings are not included or discussed in this report. Ms. Papp’s inspection findings will be discussed and presented by her in a separate report.

2.0 PARTICIPANTS

Lake City Army Ammunition Plant (LCAAP):

Denise M. Bricker, Director, Safety, Health & Environment, Olin Winchester, LLC
Carmen Brock, Environmental Engineer, Olin Winchester, LLC
Tonya Aggson, Environmental Manager, Olin Winchester, LLC
Dalton Kenig, Environmental Engineer, Olin Winchester, LLC

Kelly Hester, U.S. Army Environmental Coordinator
Brian Batliner, Supervisor, R3 Group, Olin Winchester, LLC
Eric Couch, R3 Group Operator, Olin Winchester, LLC
Bryan Lloyd, R3 Group Operator, Olin Winchester, LLC
Chad Krummel, Supervisor-Maintenance, Olin Winchester, LLC
Jessy Stroud, Maintenance/WWTP, Olin Winchester, LLC
Lieutenant Colonel Brian Jones, Army Commanding Officer*
Adam Hinsdale, Deputy to the Commander*
Jamie Allison, Vice President of Operations, Olin Winchester, LLC*
Mike Stock, Olin Winchester, LLC*
Brian Huckabay, Olin Winchester, LLC* (via phone)

* Present only at the Exit Briefing

Missouri Department of Natural Resources: (MoDNR) – Kansas City Regional Office (KCRO)
Daniel Simmons, Environmental Specialist (September 24, 2024, Only)

U.S. Environmental Protection Agency (EPA):
Trevor Urban, Environmental Scientist (913) 551-7133
Charlotte Papp, Enforcement Officer/Inspector (September 24, 2024 & Exit Briefing via phone)

3.0 INSPECTION PROCEDURES

Ms. Charlotte Papp and I met with Mr. Daniel Simmons, from the MoDNR-KCRO near the facility at 9:00 a.m. We discussed the inspection procedures and format that Ms. Papp and I would follow as well as any facility issues or concerns and regulatory history. I conducted a minimal drive-by inspection of the site along the western boundary due to the facility having controlled access points. Mr. Simmons, Ms. Papp, and I checked in at the security station located at the main entrance of the facility at approximately 9:30 a.m. and I explained the purpose of the inspection and the procedures I would follow. The security personnel stated that I would be required to provide them with my driver's license to obtain access to the facility. I provided the security personnel with the Federal Facilities Access Brochure and EPA's Final Access Policy Memorandum and stated that I was not required to provide any personal identifiable information (PII) to access the facility. However, based on my historical access experience at this facility and other similar United States Army owned and operated facilities, I was not opposed to providing the additional PII. Therefore, I provided the security personnel with my driver's license, and they cleared me to access the facility and provided me with a facility access badge. The security personnel contacted the environmental compliance personnel when we arrived. I also used my contact phone numbers retained from the previous year's inspection and contacted Ms. Denise Bricker and Ms. Kelly Hester, notifying both of my arrival and the purpose of the inspection and the procedures I would follow.

Ms. Denise Bricker arrived at the security station, and Mr. Simmons and Ms. Papp and I followed her to her office located in building 1 and parked in the parking lot located directly southeast of her office. Mr. Simmons, Ms. Papp and I followed Ms. Bricker to a conference room near her office located on the second floor of building 1. Ms. Camron Brock, Tonya

Aggson, and Kelly Hester and Mr. Dalton Kenig joined Ms. Bricker, Mr. Simmons, Ms. Papp and me and I began the entry briefing. I presented my credentials and explained the purpose of the inspection and the procedures I would follow during the inspection to Ms. Bricker, Brock, Aggson and Hester and Mr. Kenig. I then presented a copy of RCRA Section 3007(a), which contains EPA's inspection authority. I explained my need to collect accurate information and presented them with a copy of Title 18 U.S. Code, Sections 1001 and 1002. I then presented Ms. Bricker, Brock, Aggson and Hester and Mr. Kenig with a copy of the *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections* and reviewed LCAAP's confidentiality rights. I informed them I would provide a *Confidentiality Notice* at the end of this inspection. The inspection consisted of a discussion of facility operations, waste generation and waste management practices, a review of waste management records, and a visual inspection of the waste generation and management areas. I also inspected the facility for compliance with their RCRA permit. I prepared and completed a site-specific inspection checklist to document my observations. Ms. Papp performed her entry briefing after me, and informed Ms. Bricker, Brock, Aggson and Hester and Mr. Kenig that she intended to perform a focused air compliance inspection for the on-site EWI located at the facility. Mr. Simmons stated that he was from the MoDNR-KCRO, and that he was there to observe and provide any assistance pertaining to the focused air compliance inspection of the EWI.

I reviewed the Notification Acknowledge/Verification Report with Ms. Bricker and Ms. Brock that listed Ms. Tonya Aggson as the facility contact (Attachment 1). Based on this review, I made no changes to the Verification Report. Ms. Bricker stated she was the Director of the Safety Health and Environmental Department at the facility and has worked at LCAAP for approximately twenty-two years. Ms. Brock stated that she was an Environmental Engineer in the Environmental Section at the facility and has worked at LCAAP for approximately twenty years. Ms. Aggson stated that she was also an Environmental Engineer in the Environmental Section at the facility and has worked at LCAAP for approximately twenty-one years. Mr. Kenig stated that he too was an Environmental Engineer in the Environmental Section at the facility and has worked at LCAAP since December of 2022. Ms. Hester stated that she was a civilian employee for the U.S. Army and has been the Environmental Coordinator at LCAAP since March of 2023. Ms. Bricker acted as the official facility representative during the inspection. LCAAP has an on-site EWI. Mr. Bricker stated that she, Ms. Brock, Ms. Aggson and Mr. Kenig manage the day to day environmental and hazardous waste management activities at the facility which included operating the RCRA permitted EWI. Ms. Bricker, Ms. Brock, Ms. Aggson and Mr. Kenig provided facility operational information and they all accompanied Mr. Simmons, Ms. Papp and me during the inspection of the EWI and buildings 97B, 97 Porch and 97. Ms. Hester also accompanied us during the visual inspection of the EWI and buildings 97B, 97 Porch and 97. Ms. Bricker, Ms. Aggson, Ms. Hester and Mr. Kenig remained in the office with Ms. Papp and Mr. Simmons after the visual inspection of the EWI and buildings 97B, 97 Porch and 97, and provided them with requested EWI records for review. Ms. Brock and Messrs. Batliner and Couch accompanied me during the visual inspection of buildings 130E, 130F, 68C, 130A, and 49BB – Cells 1 and 3. Mr. Lloyd joined Ms. Brock and Messrs. Batliner and Couch and accompanied me during the visual inspection of buildings 13F, 13E, 13C, and 13D. Messrs. Stroud and Krummel joined Ms. Brock and Messrs. Batliner and Couch and accompanied me

during the visual inspection of the of buildings 160 and 161.

The CEI was conducted over the portions of two days. On September 24, 2024, the entry briefing, discussion of waste streams, discussion of compliance information, and the facility visual inspection of the buildings noted above occurred. I also requested documents to be reviewed the following day. Ms. Papp stated that she had completed her focused air compliance inspection and did not need to return to the facility the following day. Ms. Papp requested additional EWI records to be e-mailed to her and Ms. Papp and Mr. Simmons did not return to the facility the next day. However, Ms. Papp stated that she would attend and participate in the exit briefing via conference call when I completed my inspection. On September 25, 2025, Mses. Bricker, Brock and Hester and Mr. Kenig accompanied me during the visual inspection of building 3. I completed my visual inspection of building 3 at approximately 11:45 a.m. and then began to review the records and documents requested the previous day. After completing my review of the requested documents and records I relocated to the administration building to a conference room to perform the exit briefing.

I performed an exit briefing in the afternoon of September 25, 2024. I completed my inspection and summarized the findings and recommendations with Mses. Bricker, Brock, Aggson and Hester and Mr. Kenig. Ms. Charlotte Papp also performed an exit briefing pertaining to the focused air inspection of the EWI via the phone. Also in attendance at the exit briefing were Lieutenant Colonel Brian Jones, Mr. Adam Hinsdale, Mr. Jamie Allison, Mr. Mike Stock, Mr. Brian Batliner and Mr. Eric Couch. Mr. Brian Huckabay attended the exit briefing via the phone. I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.1E), unless noted differently. At the conclusion of the inspection, during the exit briefing, I provided Ms. Bricker with a *Confidentiality Notice* and *Receipt for Documents and Samples* which she signed as acknowledgement of receipt (Attachments 2 and 3 respectively). No confidentiality claims were made by LCAAP. No findings were observed at the time of the inspection. Therefore, a Notice of Preliminary Findings (NOPF) was not left with LCAAP. No photographs were taken during the inspection. See Attachment 4 for the site map/plant operations facility diagram.

4.0 FACILITY DESCRIPTION

4.1 Facility Information and Operations

LCAAP is located at 25201 East 78 Highway in Independence, Missouri. LCAAP is a government owned contract-operated military industrial installation under the jurisdiction of the U.S. Army Industrial Operations Command. Olin Winchester, LLC is the current contract operator of the facility and took over operations on October 1, 2020. However, Alliance Techsystems Operations, LLC (ATO) / Northrop Grumman Corporation (NGC) continues as the contract operator of the 20mm production function in building 65 at the facility. All wastes generated at the facility are managed by Olin Winchester, LLC. LCAAP manufactures small arms ammunition (5.56mm, 7.62mm, 50 caliber, and 20mm), ball rounds, energetic rounds, tracer rounds, and blank rounds. LCAAP is situated on approximately 3,900 acres of property (Attachment 3). LCAAP has approximately 1,600 employees and operates 24-hours per day,

seven days per week, utilizing multiple daily shifts. The munitions operations are currently operating 24-hours per day, five days per week (Monday – Friday), utilizing multiple daily shifts and one dayshift on weekends. The EWI operates 24-hours per day, five days per week (Monday – Friday) shutting down at approximately 16:00 hours on Friday. Ms. Bricker stated that building 4 has been removed and a new building is currently under construction in the same location that will be utilized for additional small arms ammunition production.

On September 27 and 28, 2023, EPA conducted a RCRA CEI at LCAAP and did not cite any findings during the inspection.

4.2 RCRA Status

According to the Notification Acknowledgement/Verification Report (Attachment 1), LCAAP notified as a Permitted Treatment, Storage, and Disposal (TSD) facility and a Large Quantity Generator (LQG) of Hazardous Waste. I asked Mses. Bricker, Brock and Aggson to again review the Verification Report for accuracy and they corrected the spelling for “Winchester”. I also reviewed the facility’s 2023 comprehensive biennial report which indicated the facility generated and shipped well over 2,200 pounds of hazardous waste each month (Attachment 5). I inspected LCAAP as a Permitted TSD facility and a LQG of Hazardous Waste. I also inspected LCAAP as a Small Quantity Handler of Universal Waste and a Generator of Used Oil. LCAAP’s current permit was issued May 25, 2017, and expires on May 25, 2027. Ms. Bricker stated that LCAAP last submitted a Part B Class I permit modification on July 23, 2024, to update the Commanding Officer of the facility to LTC Brian C. Jones (effective July 18, 2024). Ms. Brock provided me with the Part B Class I permit modifications via e-mail (Attachment 6). Ms. Bricker stated that LCAAP continues to follow the MoDNR state option for satellite accumulation rules.

Mses. Bricker and Brock provided me with the generator hazardous waste quarterly summary reports for the processed EWI waste and non-EWI/hazardous waste that was shipped off site since the previous inspection for review. I took a copy of the generator hazardous waste quarterly summary report for the 2nd quarter of 2024, of the processed EWI hazardous waste (Attachment 7). I also took a copy of the generator hazardous waste quarterly summary report for the 2nd quarter of 2024, of the non-EWI/hazardous waste that is stored in building 13D and shipped off-site utilizing hazardous waste manifests (Attachment 8). LCAAP made approximately 18 off-site shipments of hazardous waste in 2023, and approximately 63 off-site shipments of hazardous waste currently in 2024. LCAAP ships hazardous waste every third Wednesday of the month and the hazardous waste shipments are picked up for disposal by Heritage Environmental Services, LLC, located in Kansas City, Missouri. The designated disposal destinations are Heritage Environmental Services, LLC, located in Kansas City, Missouri; Heritage Environmental Services, located in Indianapolis, Indiana; and Heritage Thermal Services, Inc., located in East Liverpool, Ohio. A review of LCAAP’s uniform hazardous waste manifests indicates that their generator status is correct. LCAAP has an on-site Wastewater Treatment Plant (WWTP). The largest hazardous waste stream generated by the facility consists of neutralized explosive WWTP sludge. LCAAP also generates waste solvent; solvent-contaminated rags; scrap metal, rags, and corn cobs; waste propellant powder; and demil flyash generated from the EWI baghouse. LCAAP is permitted to store and incinerate characteristic hazardous waste and to also store various F, K,

and U-listed hazardous wastes as specified in their Part I Hazardous Waste Permit (HW Permit) issued May 25, 2017, by the MoDNR. The facility currently operates numerous less than 90-day hazardous waste accumulation areas (HWAA) and eleven permitted hazardous waste storage areas (HWSA). LCAAP generates spent fluorescent lamps which are handled as Universal Waste. LCAAP is a Generator of Used Oil.

5.0 FINDINGS AND OBSERVATIONS

5.1 Permit Conditions

LCAAP's eleven HWSAs are located in buildings 97B, 97 Porch, 130A, 130E, 130F, 13D, 13E, 13F, 68C, 49BB Cell 1, and 49BB Cell 3. Building 13D HWSA is permitted to store only non-explosive hazardous waste. Mses. Bricker and Brock provided me with an inventory summary report for buildings 13C and 13D the following day during records review (Attachment 9). buildings 97B, 97 Porch, 130A, 130E, 130F, 13E, 13F, 68C, 49BB Cell 1, and 49BB Cell 3 are HWSAs permitted to store explosive hazardous waste. Scrap primed cases, propellant contaminated filters, and ballistic scrap metal and projectiles from the firing range are stored in the HWSA in buildings 13E and 13F. Scrap primers and 20 mm projectiles are submerged in water and stored in the HWSAs in building 49BB, Cell 1 and Cell 3. Scrap primed cases, 20 mm projectiles, propellant powder contaminated with debris, 50 caliber projectiles, 5.56 and 7.62 tracer bullets, and scrap ammunition/components are stored in the HWSAs in buildings 97B, 130E, 130F, and 68C. The quantities of hazardous waste allowed for storage in the HWSAs and the maximum explosive limits for each explosive waste storage building are available in the HW Permit. The EWI is designated as building 97. The EWI is designed to demilitarize unserviceable ammunition items, scrap propellant powders, and explosive wastes generated from ammunition manufacturing. Building 97 has two additional HWSAs (97 Porch and 97 Washroom). Building 97 Washroom is not permitted and is considered a less than 90-day HWSA. Mses. Bricker and Brock provided me with a summary sheet for the total number of containers and total net weight/quantity of EWI waste per building the following day during record review. The summary sheet includes the storage permit limits (in gallons) for each building, the storage permit limits (in net pounds) for each building and the total number of containers currently in storage (Attachment 10). Mses. Bricker and Brock also provided me with a container inventory of EWI explosive waste per building (Attachment 11). The inventory includes the accumulation date, container number, waste profile and the content/type of waste for each container in storage.

As stated above Ms. Papp, Mr. Simmons and I began the visual inspection of facility at the EWI that is included in building 97 and the two additional HWSAs (97 Porch and 97 Washroom). We also inspected building 97B that is located next to building 97 and is discussed below. Once we concluded the visual inspection of the EWI, kill-tank area, baghouse and building 97, 97 Porch and 97 Washroom, Ms. Papp and Mr. Simmons returned to the office for file review and were accompanied by Ms. Bricker, Ms. Aggson, Ms. Hester, and Mr. Kenig. I then conducted the visual inspection of the remaining permitted storage and treatment areas. Buildings are listed in the order of inspection. As stated above, Ms. Brock and Messrs. Batliner and Couch accompanied me during the visual inspection of the remaining permitted HWSAs.

Building 97B - Explosive (1.3 & 1.4) Material Storage. There were 130 containers/cans (477.6 pounds of net explosives) of 5.56mm, 7.62mm and 50 caliber tracer bullets and miscellaneous 5.56mm, 7.62mm and 50 caliber bullet and 30 caliber blank waste in storage at the time of the inspection. The cans were closed, labeled as hazardous waste, and the earliest storage accumulation date was 06/27/2024 (Attachments 10 and 11).

Building 97 – The EWI is located in this building. Mses. Bricker and Aggson stated that the permitted metal air emissions are regulated under the maximum achievable control technology subpart EEE standards. Mses. Bricker and Aggson stated that the EWI air emissions are continually monitored for metals each minute and the data is accumulated daily. The EWI currently operating during the visual inspection and Ms. Papp performed a detailed evaluation of the EWI monitoring equipment and confirmed operational compliance with their established parameters from the control room. As stated above, Ms. Papp’s inspection findings are discussed and presented by her in a separate report. We observed employees placing waste onto the feed belts that dropped the wastes into the incinerator from the control room. We also visually inspected the washroom, incinerator, baghouse, incinerated brass collection and kill tank areas of building 97. I observed two 55-gallon satellite accumulation containers (SACs) connected to the baghouse, one 55-gallon SAC connected to the contaminated water system and one 55-gallon SAC for the collection of contaminated de-mill fly-ash. All the observed SACs were closed, labeled as hazardous waste, and had accumulation start dates.

Building 97 Porch - Explosive (1.3 & 1.4) Material Storage. There were 5 containers/cans of dry propellant powder contaminated with debris and reburn powder in storage at the time of the inspection. The containers/cans were closed, labeled as hazardous waste, and the earliest storage accumulation date was 09/16/2024.

Building 130E - Explosive Material Storage. There were 411 containers/cans (41,050.00 pounds of net explosives) of dry propellant powder contaminated with debris (six of the containers were 20mm propellant powder – Mixed Type) in storage at the time of the inspection. The containers/cans were closed, labeled as hazardous waste, and the earliest storage accumulation date was 05/10/2024 (Attachments 10 and 11).

Building 130F - Explosive (1.2, 1.3, and 1.4) Material Storage. There were 105 containers/cans (8,524.40 pounds of net explosives) of dry propellant powder contaminated with debris (two of the containers were 20mm propellant powder – Mixed Type), 50 caliber cartridges mercury scrap and mercury Scrap M8/M20/MK21 ordinance in storage at the time of the inspection. The earliest storage accumulation date was 05/10/2024 (Attachments 10 and 11).

Building 68C - Explosive Material Storage. There were 2 containers/cans (18.00 pounds of net explosives) of non-hazardous bullets and mercury scrap in storage at the time of the inspection. The bullets container was closed, labeled as non-hazardous and dated 9/17/2024 and the mercury waste container was labeled as hazardous waste and dated 6/25/2024 (Attachments 10 and 11).

Building 130A - Explosive Material Storage. There was one container/can (11.10 pounds of net explosives) of 5.56 non-hazardous trace bullets in storage at the time of the inspection. The trace

bullets container was closed, labeled as non-hazardous and dated 6/26/2024 (Attachments 10 and 11). The inventory for building 130A includes three additional carts of bullets that had been removed from the building earlier in the day.

Building 49 BB - Cell 3 - Explosive (1.1) Material Storage. There were 57 containers filled with primers covered with water (486.82 pounds) in storage at the time of the inspection. The containers were open as allowed per the HW Permit, labeled as hazardous waste, and the earliest storage accumulation date was 08/21/2024 (Attachments 10 and 11).

Building 49 BB - Cell 1 - Explosive (1.1) Material Storage. There were 43 containers filled with primers covered with water (356.62 pounds) in storage at the time of the inspection. The containers were open as allowed per the HW Permit, labeled as hazardous waste, and the earliest storage accumulation date was 09/10/2024 (Attachments 10 and 11).

*Ms. Brock and Messrs. Batliner, Couch and Lloyd accompanied me during the visual inspection of the buildings listed below.

Building 13E - Salvage/Disposal Material Storage. This building is used for storing 55-gallon containers of scrap metal/primed cases (5.56 and 7.62 calibers) and ballistic sand and projectiles from the firing range to be incinerated in the EWI. The building did not have any containers/cans in storage at the time of the inspection.

Building 13F - Salvage/Disposal Material Storage. This building is used for storing 55-gallon containers of primed cases (5.56 and 7.62 calibers) and ballistic sand and projectiles from the firing range to be incinerated in the EWI. I observed 13 55-gallon containers of ballistic sand/floor sweepings waste and one 55-gallon container of 6.8mm bi-metal/primed cases (468.0 pounds of net sand/primed cases) at the time of the inspection. The 13 55-gallon containers of ballistic sand/floor sweepings waste were closed, labeled as hazardous waste, and all dated with the storage accumulation date of 07/08/2024. The one 55-gallon container of 6.8mm bi-metal/primed cases was closed, labeled as hazardous waste, and dated with a storage accumulation date of 06/27/2024.

Building 13A - Equipment Storage. This building is used to store the line crew truck and maintenance equipment. I did not inspect this building during the visual inspection.

Building 13B - Equipment Storage. This building is shared with WWTP department to store empty containers and WWTP products. I did not inspect this building during the visual inspection.

Building 13C – Non-Hazardous Material Storage. Non-hazardous waste is stored in this building including used oil, oil and grease, oil contaminated material, empty aerosol cans, solvent contaminated rags, water-based paint, PCB ballasts, and universal waste lamps, batteries and mercury containing switches. I observed used oil, oil and grease, oil contaminated materials, universal waste lamps, and universal waste batteries being accumulated in the building at the time of inspection. The universal waste containers were closed, marked as universal waste, and

dated with accumulation start dates of less than one year (the latest 12/11/2023). I observed approximately 3 55-gallon containers of used oil that were all labeled as used oil. See Attachment 9 for inventory at the time of the inspection.

Building 13D - Non-Explosive Material Storage. This HWSA is for hazardous waste destined for off-site disposal. I observed approximately 53 containers of hazardous waste in storage during the inspection. The containers were closed, labeled as hazardous waste and the earliest storage accumulation date was 05/02/2024. I did not observe any issues of concern. See Attachment 9 for inventory at the time of the inspection.

I visually inspected the permitted hazardous waste storage and treatment areas. I did not observe non-compliance with the waste management requirements of the HW Permit. The HW Permit includes standard, general and special permit conditions. Special permit conditions include: Storage in Containers [40 CFR Part 264 Subpart I], Incinerator Requirements [40 CFR Part 264 Subpart O], Post-Closure Care Requirements [10 CSR 25-7.264(2)(G)], Waste Minimization [40 CFR 264.73(b)(9)], Groundwater Protection Standards [40 CFR Part 264 Subpart F], Seismic Evaluation Requirements [10 CSR 25-7.270(2)(B)4], Land Disposal Restriction Requirements [40 CFR Part 268], and Air Emissions Standards for Tanks, Surface Impoundments, and Containers [40 CFR Part 264 Subpart CC].

5.2 Facility Wastes

LCAAP handles the disposal of their various hazardous waste streams via off-site disposal at an authorized TSD, via the on-site EWI or via treatment in the on-site WWTP and discharges to the Little Blue Valley Sewer District.

I inspected several buildings that generate hazardous waste at the facility and spoke with personnel that control and operate those functions in each building on the afternoon of September 24, 2023. Ms. Brock and Messrs. Batliner, and Couch, accompanied me during the visual inspection of the buildings listed below and are listed in the order of inspection. Mr. Chad Krummel, Supervisor-Maintenance & Chief Operator of the WWTP, and Mr. Jessy Stroud, Operator-Maintenance also accompanied me during the visual inspection of the buildings 161 and 160 and provided the operational and waste management activities performed in those buildings.

Building 161 – Messrs. Krummel and Stroud stated the pyrotechnic wastewater collected from the production areas is accumulated in 55-gallon metal drums prior to treatment. The debris is removed by screens, containerized, and accumulated as hazardous waste prior to treatment. Cloth rags generated in the pyrotechnic production areas are also collected and pre-rinsed in building 161 prior to being laundered. The treated sludge has been determined to be non-hazardous waste. The non-hazardous sludge is collected in a 20-cubic-yard roll-off container and disposed at the Johnson County Landfill, Inc. The treated wastewater discharge to the sewer is permitted by the Little Blue Valley Sewer District. I observed the non-hazardous sludge being accumulated in the 20-cubic-yard roll-off container with a cover/lid on top of the container. Ms. Brock stated that building 161 was going to be shut down temporarily in order to remove and replace the

plumbing/pipes within the building. Ms. Brock stated that the shutdown will not exceed four weeks and that approximately 70 – 75 55-gallon containers of cloth rags/pyrotechnic waste generated during that time will be collected and stored in building 49BB – Cell 3. Building 161 was still in operation during the inspection and I observed a 55-gallon container of hazardous waste Hoffman filters bags (closed, labeled as hazardous waste, and dated 7/11/2024), a 55-gallon container of non-hazardous water contaminated with pyrotechnics and a 15-gallon container of non-hazardous moat scrap.

Building 160 – Mr. Krummel stated the neutralized explosive WWTP is located in this building. This on-site WWTP is designed to treat the neutralized explosive wastewater. The neutralized explosive wastewater treatment plant sludge is stored in 40-cubic-yard roll-off containers. There were two roll-offs inside the building positioned under the north and south WWTP filter presses. The north roll-off was being utilized to accumulate hazardous waste during the inspection and was closed/tarped, labeled as hazardous waste and dated 09/17/2024. Mr. Krummel stated the north roll-off was less than half full and contained K046 and D005 hazardous waste. The south roll-off was empty during the inspection but was closed/tarped, labeled as hazardous waste and dated 09/24/2024. Ms. Brock stated the roll-offs are dated when they are placed into the building and that approximately two roll-off containers of the hazardous waste are generated weekly. Ms. Brock stated they are picked up every Tuesday and with an on-call option when production increases. The neutralized explosive WWTP sludge is sent off site for disposal as K046 and D005 hazardous waste. The designated disposal facility is Heritage Environmental Services, located in Indianapolis, Indiana. The treated wastewater is discharged in accordance with a pretreatment permit to the sewer operated by Little Blue Valley Sewer District.

* Mses. Bricker, Brock, Hester, and Mr. Kenig accompanied me during the visual inspection of the building listed below on morning of September 25, 2024.

Building 3 – 7.62mm and 50 caliber Ammunition Manufacturing. Building 3 has two levels for production. The first and second floors both perform priming and loading activities. The first floor also includes scamp, caseline, inner and outer tip, packaging with solvent waste, and maintenance with universal wastes. The second floor includes pull down wastes, tip ID, and bullet burnish with phosphoric waste. The SACs which I observed in use during the inspection of building 3 were closed, labeled as hazardous waste, and dated. The containers included primed cases, flammable solvent, scrap primers, mercury waste, contaminated rag waste, waste paint and dry propellant powder contaminated with debris. Hazardous waste, used oil, and universal waste is stored in the building 3 maintenance area. I observed a 55-gallon container of used oil labeled as “used oil”. I observed a fiberboard container of spent fluorescent lamps and a pail of batteries. The containers were closed, labeled as universal waste, and dated. I also observed one 55-gallon drum SAC for empty aerosol cans, one 55-gallon drum SAC for broken fluorescent lamps. Both SACs were closed, labeled as hazardous waste, and dated.

Universal Waste Lamps and Batteries - LCAAP utilizes both 4-foot and 8-foot fluorescent lamps. The spent fluorescent lamps are picked up every third Wednesday of the month for recycling by Heritage Environmental Services. All the containers for spent fluorescent lamps which I observed during the inspection were closed, marked as universal waste lamps, and dated.

LCAAP also utilizes batteries throughout the facility and the batteries are collected and managed in the same manner as the lamps. Ms. Brock provided me with the universal waste bills of lading for the shipments of universal waste lamps and batteries for review. I provided the LCAAP representatives with compliance assistance information regarding management of spent fluorescent lamps and batteries.

Used Oil - Used oil is generated from facility vehicles and equipment. The used oil is picked up for recycling by Heritage Environmental Services. The generation rate is approximately 3,500 - 4,000 gallons per week. Approximately 90% of all used oil is generated from treatment of oily wastewater from production in the dissolved air flotation unit located in the WWTP. Ms. Brock provided me with the used oil bills of lading for the used oil shipments for review. All the used oil containers which I observed during the inspection were closed and marked as “used oil”.

Scrap Metal – Scrap metal is recycled by Total Metals located in Granite City, Illinois. The generation rate for scrap metal is variable. Brass and brass shavings are separated and recycled separately from other metals.

General Trash - The general trash is picked up daily by Republic Services, located in Independence, Missouri.

5.3 Other Regulatory Requirements

Emissions: 40 CFR Part 265 Subparts AA, BB, CC - EPA regulations in 40 CFR Part 265, Subparts AA, BB, and CC apply to LQGs. If a LQG manages hazardous waste with an organic concentration greater than 10 parts per million by weight (ppmw), the standards found in Subpart AA apply to hazardous waste air emissions from certain process vents. A process vent used in distillation, fractionation, solvent extraction, thin-film evaporation, air stripping, or steam stripping is regulated by Subpart AA. Ms. Bricker stated that LCAAP is not subject to the Subpart AA regulations because the facility does not have any of the process vents listed above.

If a LQG has equipment that contains or contacts hazardous waste composed of 10 percent or greater organics by weight, the facility is subject to Subpart BB standards for inspection and monitoring of the equipment. Ms. Bricker stated that LCAAP is not subject to the Subpart BB regulations because it does not have equipment that contains or comes in contact with hazardous waste.

The standards found in Subpart CC apply to LQGs that manage hazardous waste in containers, tanks, and surface impoundments, with volatile organic compounds (VOC) concentration that exceeds 500 ppmw. The Subpart CC standards are applicable at LCAAP because the facility accumulates hazardous waste with VOC concentrations in containers. During the CEI, I determined that LCAAP complies with the Subpart CC requirements for 55-gallon containers by using Container Level 1 controls (containers approximately 26 to 122 gallons that are U.S. Department of Transportation [DOT]-approved). I visually inspected containers of hazardous waste stored in buildings 3, 13D, 13C, 160 and 161 on September 24 and 25, 2024. The containers subject to Level 1 controls were closed and were U.S. Department of Transportation

(DOT) shipping containers. I noted no concerns with management of hazardous waste per the Subpart CC air emissions requirements.

Pre-Transport, Containerization, and Storage - All the accumulation containers that I observed during the inspection were in good condition, closed, marked as hazardous waste, and dated. I observed no signs of spills or releases of any kind in any of the HWAAs. I asked Mses. Bricker and Brock and Mr. Kenig how often the HWSAs are inspected, and Ms. Brock stated the areas are inspected weekly. I reviewed the weekly inspection sheets for buildings 97B, 97 Porch, 130A, 130E, 130F, 13D, 13E, 13F, 68C, 49BB Cell 1, and 49BB Cell 3 for the past twelve months (back to the previous inspection date). The weekly inspections are documented and included all the required information and include the post closure permit required inspections for solid waste management units. LCAAP also documents the weekly inspections of all the hazardous waste accumulation and storage areas. I did not observe any issues of concern.

Satellite Accumulation - I observed numerous SACs in use during the time of the inspection. The SACs that I observed during the inspection were closed, labeled as hazardous waste, and dated. The SACs that I observed had all been in use for less than one year. I observed no signs of spills or releases at any of the SACs.

Preparedness, Prevention and Emergency Procedures - All the areas of the LCAAP which I visually inspected appeared to be operated to minimize the possibility of a hazardous waste release and have the necessary response equipment and communication devices readily available.

Uniform Hazardous Waste Manifests – Ms. Brock stated the LCAAP ships hazardous waste every third Wednesday of each month from building D and one 40-cubic yard of hazardous waste sludge from building 160 every Tuesday. Mr. Brock provided me with 18 manifests for the hazardous waste shipped since the last inspection in September 2023 for review. Ms. Brock also provided me with 63 manifests for the hazardous waste shipped in 2024 for review. I reviewed all the 2023 and 2024 manifests and they appeared to meet the regulatory standards. The facility made approximately 81 off-site shipments of hazardous waste from September 28, 2023 - September 25, 2024. See Attachment 12 for copies of the Hazardous waste manifests, LDRs and summary reports with waste profiles for shipments in September of 2023. No issues or findings were noted. Ms. Brock also provided me with a copy of the generator hazardous waste quarterly summary reports for the 3rd and 4th quarters of 2023, and the 1st and 2nd quarters of 2024, for the non-EWI/hazardous waste that is stored in building 13D for review. See Attachment 8 for the 2nd quarter of 2024 report. I did not observe any issues of concern.

Land Disposal Restrictions - The land disposal restriction notices were on file for all waste codes shipped off site during the past twelve months and appeared to meet the regulatory standards. I did not observe any issues of concern.

Waste Minimization Plan – Ms. Brock provided me with the P3 Plan (Pollution Prevention Plan) dated January 2024, for review. Ms. Brock stated the P3 Plan served as the facility waste minimization plan. I reviewed the P3 Plan and did not observe any issues of concern.

Contingency Plan - The LCAAP contingency plan was reviewed in depth. Mses. Bricker and Brock stated that the contingency plan was reviewed and revised in September of 2023. Ms. Brock provided me with a copy of the contingency plan dated September 2023, after the conclusion of the inspection via e-mail (Attachment 13). Appropriate arrangements and coordination have been made with the local response agencies. An emergency coordinator is always available for response to emergencies. The home addresses and phone numbers of the emergency coordinators were included in the contingency plan (Attachment 13 page 13). The contingency plan includes the description and location of emergency equipment, and an evacuation plan. I reviewed the contingency plan and did not observe any issues of concern.

Quick Reference Guide - The Quick Reference Guide (QRG) was reviewed in depth. Mses. Bricker and Brock stated that the QRG was reviewed and last revised in June of 2023. Ms. Brock provided me with a copy of the Hazardous Waste Contingency Plan – QRG after the conclusion of the inspection via e-mail (Attachment 14). Appropriate arrangements and coordination have been made with the local response agencies. An emergency coordinator is always available for response to emergencies. The home addresses and phone numbers of the emergency coordinators were included in the QRG. The QRG includes the description and location of emergency equipment, and an evacuation plan. I reviewed the QRG and did not observe any issues of concern.

Personnel Training - I reviewed the personnel training plan and records in depth and the records revealed that the employees had received the appropriate training in the required time frame. The training plan includes several tables that have current employee rosters with job titles and job descriptions for the required RCRA training. Ms. Bricker stated that she had updated the training program after the previous RCRA inspection and that all employees receive “waste container transfer” training. Ms. Brock provided me with a copy of job titles and descriptions and a training plan matrix for employees who perform hazardous waste operations during the inspection for review (Attachment 15). Ms. Brock also provided me with copies of the 2022 and 2023 hazardous waste training attendance sheets for RCRA Annual, 8-hour Hazwoper and DOT Waste regulatory training for review (Attachment 16). Original Hazwoper Training certificates for Environmental Engineer, Dalton Kenig, and 8-hour Hazwoper refresher certificate for R3 Group employee, Julia Beal was also provided by Ms. Brock for review (Attachment 16). I reviewed the training plan, matrix and training records and did not observe any issues of concern.

5.4 Additional RCRA Issues

RCRA Post Closure Permit Requirements – LCAAP has been managing several impoundments and trenches as part of their RCRA permit for the past 30 years. LCAAP and MoDNR entered into an agreement to extend the post-closure care of the impoundments and trenches and defer the post-closure care activities to the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) Program. MoDNR in letter dated December 28, 2020, approved Lake City’s Class 2 Permit Modification to extend Post-Closure Care for the closed Oil and Grease Trenches, the East IWTP Closed Surface Impoundments, the Closed Explosive Wastewater Lagoons, the Explosive Wastewater Impoundments and Area 8

Landfill. The post-closure care, groundwater monitoring, groundwater protection standards and corrective action for releases of hazardous waste or hazardous constituents from hazardous waste management units subject to post-closure care at Lake City are deferred to CERCLA.

The previous inspection revealed that the Part B Class I permit modifications included the removal of hazardous waste storage bunker 130D from the permitted hazardous waste storage list. Ms. Brock stated bunker 130D is now utilized for storage of high explosive production materials. Mr. Brock stated that post-closure care of bunker 130D would be performed once the bunker was no longer used for storage of explosive materials.

No additional specific information was requested from the facility during the exit briefing. I provided Ms. Bricker with the following compliance assistance guidance during the exit briefing: Security Awareness (EPA pamphlet), Commercial Motor Vehicle Transportation Security Planning (EPA information sheet), Publications for Small Businesses (EPA booklet), and U.S. EPA Small Business Resources (EPA Fact Sheet). See Attachment 17 for the entry/exit briefing checklist and exit briefing attendance sheet. I reviewed all other applicable RCRA and TSD facility requirements and no other apparent violations were noted.

6.0 SUMMARY

I inspected LCAAP as a permitted TSD facility, an LQG of hazardous waste, a small quantity handler of universal waste, and a generator of used oil. LCAAP's current permit was issued on May 25, 2017, and expires on May 25, 2027. Ms. Bricker stated that she, Ms. Brock, and Mr. Kenig manage the day to day environmental and hazardous waste management activities at the facility which include the operation of the permitted EWI. I visually inspected the permitted hazardous waste storage and treatment areas. LCAAP appears to be in compliance with all the standard, general and special permit conditions in the HW Permit. LCAAP and MoDNR entered into an agreement to extend the post-closure care of the impoundments and trenches and defer the post-closure care activities to the CERCLA program. I reviewed all applicable Missouri LQG requirements, and I did not observe any other environmental concerns or areas of RCRA non-compliance during my inspection. Therefore, a NOPF was not left with LCAAP during the inspection. However, further EPA review may change or add to my findings.

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Trevor L. Urban
Environmental Scientist
ECAD/CB/RCRA
Date:

AMBER WHISNANT

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

Attachments:

1. Notification Acknowledgement/Verification Report (1 page)
2. Confidentiality Notice (1 page)
3. Receipt for Documents and Samples (1 page)
4. Facility Diagram/Site Map (1 page)
5. 2023 Comprehensive Biennial Report Dated 09/30/2024 (23 pages)
6. RCRA Part B Permit Modifications Dated 8/16/24 and 7/23/24 (4 pages)
7. 2023 2nd Quarter Generator Summary Reports for EWI Waste (6 pages)
8. 2023 2nd Quarter Generator Summary Reports for Non-EWI/Off-Site RCRA Shipments (18 pages)
9. Permitted Storage Inventory and Profiles of Non-Explosive Waste in Buildings 13D and 13C (8 pages)
10. Permitted Storage Inventory Summary of EWI Explosive Waste Per Building (1 page)
11. Permitted Storage Container Inventory of EWI Explosive Waste Per Building (25 pages)
12. Hazardous Waste Shipping Manifest and LDRs for Buildings D and 160/WWTP (38 pages)
13. Contingency Plan Dated September 2023 (22 pages)
14. Quick Reference Guide (24 pages)
15. Job Titles and Descriptions with Training Plan Matrix for R3 Operators and Waste Management Personnel (3 pages)
16. R3 Operators, Wastewater Operators and Environmental Personnel 2022 & 2023 RCRA Training Records and Certificates for Dalton Kenig and Julia Beal (8 pages)
17. Entry/Exit Briefing Checklist with Entry and Exit Briefing Attendance Rosters (3 pages)