REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

DUNCAN AVIATION, INC.
3701 Aviation Road
Lincoln, Nebraska 68524
402-475-2611

EPA Identification Number: NED980971733

On

August 10, 2021

By

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 7
Enforcement & 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 performed a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Duncan Aviation, Inc. (Duncan Aviation), located in Lincoln, Nebraska, on August 10, 2021. I conducted the inspection under the authority of RCRA Section 3007(a), as amended. During the inspection, I collected the information necessary to determine compliance with the applicable regulatory and statutory requirements. This report and attachments present the results of the inspection. Based on the information obtained during the inspection, I inspected the facility as a large quantity generator of hazardous waste, used oil generator, and small quantity handler of universal waste. The State of Nebraska last inspected the facility for RCRA compliance on September 8, 2011. The EPA last inspected on January 17, 2018.

2.0 PARTICIPANTS

Duncan Aviation, Inc.
Kelly Becker, Environmental Supervisor (38 years with company, 23 years in position)
402-479-4254 Kelly.Becker@DuncanAviation.com
Harry Frye, Facility Maintenance Manager (25 years with company, 6 years in position)
402-479-4133 Harry.Frye@DuncanAviation.com

U.S. Environmental Protection Agency (EPA):
Edwin G. Buckner PE, Environmental Engineer, ECAD/CB/RCRA

3.0 INSPECTION PROCEDURES

On August 5, 2021, at approximately 13:35, I called 402-475-2611 and left a message for Kelly Becker, the site contact listed in RCRAInfo. Mr. Becker returned the call at approximately 14:45 the same day. I introduced myself and explained the purpose of the call. I informed Mr. Becker that I intended to commence a RCRA inspection on Tuesday, August 10, 2021. I asked if Duncan Aviation practiced any special protocols in response to the COVID-19 pandemic. Mr. Becker said vaccinated individuals did not have to don masks. Other than that, no specific precautions were in place other than social distancing. Regarding other safety equipment, Duncan Aviation requires closed-toe shoes. I informed Mr. Becker that during the inspection, I would want to examine the facility's RCRA contingency plan, training records, waste generation rates, and inspection records for the central accumulation areas (CAA). I would also like a copy of a facility plan for review. I agreed to conduct the inspection during normal business hours and informed Mr. Becker I would arrive between 08:00 and 09:00.

Upon arrival in Lincoln around 18:00 on August 9th, I drove to the facility and observed it from surrounding city streets. Most operations appeared to occur inside the buildings. I observed a drum storage area but saw nothing of concern during this drive-by screening.

On August 10th, I arrived at the facility at approximately 08:30. I identified myself to the receptionist who called Mr. Becker. Mr. Becker escorted me to Harry Frye's office where I met Mr. Frye for the in-briefing. Since Mr. Frye would be occupied at a different facility that day, I used a table in his office for document review and meetings. I showed Mr. Frye and Mr. Becker my credentials and we exchanged business cards (Attachment 1). I explained Section 3007 of RCRA which provides inspection authority. I also explained my need to collect accurate information and provided Mr. Becker with a copy of Title 18 U.S. Code, Sections 1001 and 1002. As part of the in-briefing, those assembled were made aware of Duncan Aviation's confidentiality rights and informed that a Confidentiality Notice would be provided at the end of the inspection to make, or not to make, any claims. Mr. Becker acted as the facility representative for the CEI. I reviewed with Mr. Becker a copy of the Hazardous Waste Site Info Verification Report for the facility (Attachment 2). Mr. Becker confirmed that the information in that notification was current and correct.

During the inspection, discussions consisted of wastes generated and waste management practices. I conducted a visual inspection of the various processes in the facility that utilized satellite accumulation areas (SAA) and the two central accumulation areas (CAA) used to accumulate hazardous waste for less than 90 days. Information collected during the inspection was documented in my notes and is discussed below.

At approximately 15:30, I concluded the inspection activities for the day and conducted the close-out meeting. Mr. Becker and Mr. Frye participated in the meeting. In that meeting I summarized the findings and recommendations with Mr. Becker and Mr. Frye. I provided Mr. Becker with a *Confidentiality Notice* (Attachment 3) which he signed as acknowledgement of receipt. Mr. Becker made no confidentiality claims. I also provided Mr. Becker with a Receipt for Documents and Samples (Attachment 4).

I issued a Notice of Preliminary Findings (NOPF) (Attachment 5) that identified one preliminary finding. Additional areas of concern are identified in this report which may become findings upon further EPA review. Mr. Becker signed the NOPF acknowledging receipt. On August 24, 2021, Mr. Becker sent an email to me and the RCRA Enforcement mailbox responding to the NOPF.

The following inspection documents and compliance assistance handouts were provided to Duncan Aviation:

Inspection Documents
RCRA Compliance Evaluation Inspection
RCRA Facility Access Information Sheet
SWDA § 3007
US Code Annotated §§ 1001 and 1002
Notice Regarding Proprietary/Confidential Business Information
Confidentiality Notice
Receipt of Documents and Samples
Notice of Preliminary Findings

EPA Compliance Assistance Handouts
Industry Sector Notebooks
EPA Compliance Assistance Centers
Security Awareness
RCRA OnLine
Emergency Response Program
Hazardous Waste Generator Rule
Choosing a Responsible Recycler

I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.1D), unless noted differently. Any Federal regulatory citations noted in this report are as adopted by reference in the authorized Nebraska regulations.

4.0 FINDINGS AND OBSERVATIONS

4.1 General Information/Facility Description/RCRA Status

Duncan Aviation is the largest privately owned business jet service provider in the world. With complete maintenance, repair, and overhaul service offerings at three US facilities, regional shops, and mobile technical teams able to provide services worldwide as described on its website at www.duncanaviation.aero. Duncan Aviation has been located at this site on the eastern side of the Lincoln Airport since about 1963. Aircraft painting and maintenance operations occur in several hangers and workshops at the site. They have other noncontiguous facilities at the airport that operate as very small quantity generators. This facility has approximately 391,376 square feet under roof. It is staffed by approximately 1,200 employees who work in three shifts. A map of the facility may be found in Attachment 6.

The RCRA Site Verification Report (Attachment 2) indicates that Duncan Aviation is a large quantity generator of D001, D006, D007, D008, D018, D035, D039, F003, F005 and F019 hazardous waste. I reviewed the site verification report with Mr. Becker who did not identify any updates. Based on hazardous waste generation rates (greater than 2,200 pounds of known hazardous waste per month), I determined Duncan Aviation to be a large quantity generator. In addition, I determined Duncan Aviation to be a used oil generator and a small quantity handler of universal waste.

4.2 Waste Streams and Waste Management

Duncan Aviation maintains several SAAs throughout the facility, mainly in paint booths, paint hangers, and at wastewater treatment units. Duncan Aviation has two CAA, one in the Chemical Storage Building and the Outside Accumulation Area northeast of Paint Hangers 1 and 2 (Building 5600). Duncan Aviation uses its own internal numbering system to identify various waste streams. Using the facility's quick reference guide (Attachment 6) and its waste generation records (Attachment 7), I compiled the following table to corelate the Duncan Aviation waste stream numbers with descriptions of the waste and the waste's point of generation.

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Duncan Aviation Waste Stream Table							
Waste Stream DA Code	**Waste Stream Description**	**Generating Process**	**Notes**	**Waste Codes**	**2019 Total Pounds Disposed**	**2020 Total Pounds Disposed**	**2021 To Date Pounds Disposed**
427	Wastewater treatment sludge	Paint Hanger 1-2	Filter press	D007, F019	5,850	6,750	2,250
428	Wastewater evaporator sludge	Paint Hanger 3-5, Hanger G Structures Dept.	Evaporator	D007, F019	9,775	7,475	2,875
547	Paint Hanger 1 Cleaning Residue	Paint Hanger 1		D006, D007	12,825	8,550	
548	Paint Related Waste (liquids)	Hanger D Upholstery, Interior Completions, Fabrication, Finish Dept., Hanger G Structures, Paint Hanger 1-5,	First rinse of spray guns.	D001, D008, D018, D035, F003, F005	26,400	31,200	15,200
549	Paint Related Waste (liquids)	Throughout	Aerosols	D001, D008, D035, D039	400	800	
550	Hazardous waste solids containing chromium	Paint Hanger 1, Paint Hanger 4,	Stripper waste	D007	45,450	49,950	21,600
553	Waste contaminated solvent towels (solid)	Paint Hangers,		F003, D007	19,200	16,200	6,200
554	Hazardous waste solids containing chromium	Throughout	Masking, etc.	D007, D006	21,250	22,375	16,185
701	Hazardous waste sand blast media	Center Section Accessory Dept,		D006, D007	6,000	6,300	3,600
702	Hazardous waste sand blast media	Center Section Accessory Dept,		D006	600	1,200	900
703	Hazardous waste sand blast media	Center Section Accessory Dept,		D006, D008	300	300	

720	Fuel Filters	Tank farm	Av gas is haz for Pb	D008		125	
740	Hazardous waste Distilled bottoms (solid)	Solvent Still in Paint Hanger 3-5	MEK	D035, F005	3,200	3,600	2,000
2408	Hazardous waste solids containing flammable materials	Outdated products throughout facility		D001, F003, F005	1,750	1,250	500
	Broken Lamps	Throughout facility	One drum per three years	D009			
	Used Oil			Used Oil			
	Fluorescent Lamps	Throughout facility and aircraft		Universal Waste			
	Lead-Acid Batteries	Throughout facility		Part 266, Subpart G			
	Silver Batteries	Throughout facility		Universal Waste			
	NiCad Batteries	Throughout facility		Universal Waste			
	Lithium Batteries	Throughout facility		Universal Waste			

Mr. Becker stated that Duncan Aviation ships hazardous waste off site every 90 days in an effort to maximize the size of shipments. Review of the waste generation records in Attachment 7 suggest that Duncan Aviation may have exceeded the 90-day limit for accumulating hazardous waste in December 2020. According to these records, the facility generated 2,000 pounds of 554 waste (hazardous waste solids containing chromium) in September 2020. The last time that waste was disposed of was August 12, 2020. This waste was next shipped for disposal on December 16, 2020. If this waste was placed into the CAA between August 12, 2020, and September 17, 2020, it would have accumulated longer than 90 days. Currently available records do not provide the date this waste left SAA and accumulated in CAA. **The potential for violating 40 CFR 262.34(a) exists for this waste or others entering CAA during that time.**

4.3 Areas Visually Inspected

The areas visually inspected during this inspection are discussed below. The following sections of the report describe what I observed while visually inspecting the facility. Mr. Becker escorted me during the tour.

4.3.1 Paint Hanger 3, Building 5580

Paint Hanger 3 is used to paint large aircraft. Duncan Aviation maintains an SAA in this area (Photographs 1-4) that includes a 55-gallon drum of waste paint and solvent (548), a 55-gallon drum of used solvent destined for recycling, and a 55-gallon drum of waste wipes (553). The containers were labeled, closed, and in good condition. I noted an abundance of dried paint spillage on the floor around the satellite containers. The primer used for aircraft contains chromium. If primer were among the paints spilled on the floor, that would constitute illegal disposal of a hazardous waste. I could not determine if primer was spilled in this location.

4.3.2 Distillation Room, Building 5580

In a room between Paint Hanger 3 and Paint Hanger 4, Duncan Aviation operates a still to recover solvent used to clean painting equipment (Photograph 5). When a painter first cleans out a spray gun, the resulting waste is considered hazardous waste (548). When the painter flushes solvent through the paint gun after the first cleaning, he collects the resulting waste for recycling. That collected solvent is processed in this still. I inspected the still room and found several drums there, but all were empty. Two drums were available to collect still bottoms and the others had been emptied.

4.3.3 Paint Hanger 4, Building 5580

Painting was actively occuring in Paint Hanger 4. We opened the door to the hanger and looked in at the SAA. Viewed from a distance, all containers appeared to be labeled, closed, and in good condition.

4.3.4 Paint Hanger 5, Building 5580

Duncan Aviation uses aircraft primer in Paint Hanger 5. Waste primer carries a D007 waste code for chromium. I observed three satellite containers here accumulating waste paint, spent solvent, and chromium contaminated solids such as masking materials. All containers were labeled, closed, and in good condition.

4.3.5 Wastewater Evaporation, Building 5580

Wash waters from the processes in Building 5580 contain chromium. This includes chromium from the chemical conversion coating of aluminum. Photograph 6 shows the equipment in the evaporator room. The square device in the back provides the first stage of evaporation. The plastic tanks on the right feed that evaporator. Not in the photograph, south of the plastic tanks, is a stainless-steel tank that receives the sludge from the first evaporator. That sludge is then placed in the round evaporator in front of the square evaporator. Sludge (428) removed from that evaporator is managed as a hazardous waste with codes D007 and F019.

4.3.6 Central Accumulation Area, Chemical Building 5597

Duncan Aviation maintains one of two CAAs in the Chemical Building. Besides hazardous wastes, raw materials are also stored in this building. Inside the building, in the Northeast corner, I observed two Gaylord boxes of filters taken from Paint Hangers (Photograph 7). These filters are hazardous for chromium. The boxes were closed, labeled, dated, and in good condition. Adequate aisle space was provided around the boxes.

Extending from the center of the north wall, were two rows of hazardous waste containers (Photograph 8). There was one row of fifteen 55-gallon drums of (550) hazardous waste solids containing chromium. To the west of that was a row of ten 55-gallon drums of (553) hazardous waste contaminated wipes containing chromium. The drums were closed, labeled, dated, and in good condition. Adequate aisle space was provided around the rows of drums. Photograph 9 shows the SAA in the northwest corner of the chemical building. To the right was a black 55-gallon drum which contained broken fluorescent lamps. Duncan Aviation manages broken lamps as hazardous waste. The black 55-gallon drum in the middle contained (553) hazardous waste contaminated wipes. It was sitting under a compactor used to compress the contents of the drum. The black 55-gallon drum on the left held various containers of outdated chemicals from throughout the facility. Mr. Becker said the Federal Aviation Administration (FAA) is stringent about not using materials that reach their expiration dates, so Duncan Aviation actively disposes of outdated materials and accumulates them in this drum. To the left of these three drums, under a shelf, was a Gaylord box containing waste paint room filters. This box is an SAA for the various paint booths and hangers generating waste filters contaminated with chromium. These SAA containers were closed, labeled, and in good condition. **Although this SAA is not at or near the various points of generation, it is central to facility operations and under the control of the environmental department.**

I observed, in the southeast corner of the Chemical Building, accumulated universal wastes (Photograph 14). To the south of the doorway, I saw 15 boxes of lead-acid batteries managed under Part 266 Subpart G. There were also 26 boxes of NiCad batteries, three boxes of eight-foot fluorescent lamps, seven boxes of four-foot fluorescent lamps, and one box of three-foot fluorescent lamps. All these boxes were properly closed, labeled, and dated. The universal waste lamps came from both facility structures and aircraft. On the doorstep I observed four, 5-gallon (36 pound) buckets of NiCad and lithium batteries and one 1-gallon bucket of silver batteries, properly labeled and dated, ready for transport off site. There were five 5-gallon and one 1-gallon buckets sitting on a cart. These buckets were receiving waste batteries and were properly labeled, closed, and dated.

4.3.7 Paint Hanger 2, Building 5600

The SAA is in Paint Hanger 2 is in the northeast corner and is comprised of four 55-gallon drums and one 30-gallon drum. As seen in Photograph 10, the drums contained aerosol cans, chromium waste paint filters (554), waste wipes (553), waste solvent for recycling, waste paint and solvent (548). The containers were closed, labeled, and in good condition.

4.3.8 Paint Hanger 1, Building 5600

The SAA in Paint Hanger 1 had the same waste containers as the SAA in Paint Hanger 2 with the addition of a 55-gallon drum containing stripper waste (550). The containers were closed, labeled, and in good condition.

4.3.9 Wastewater Treatment, Building 5600

Wastewater in this area (Photograph 11) is treated using flocculation and filter presses. The sludge (427) from this process is D007 and F019 hazardous waste. There was one 55-gallon drum of the sludge in this area managed as an SAA. The container was labeled, closed, and in good condition.

Duncan Aviation also managed a 55-gallon drum SAA in this area to puncture and collect the contents of aerosol cans. The facility manages all aerosol cans as reactive hazardous waste and collects aerosol cans in various SAA throughout the facility. It brings the collected cans here to puncture and collect the contents which are managed under the company hazardous waste code 549. The Federal waste codes D001, D008, D035, and D039 apply to this collected material. The empty steel cans are collected in a separate container for recycling. **This SAA is not at or near the point of generation for the aerosol cans and receives waste from other SAA.**

4.3.10 Outside CAA, North of Building 5600

Photograph 12 shows the various 55-gallon hazardous waste containers in this area. Farthest in the photograph is a white drum containing a spill kit. Farthest away (east) in the containment area was one drum of wastewater treatment sludge from the filter press (427). Next to that was one drum of wastewater evaporator sludge (428). Progressing closer to the camera was three

drums of hazardous media blast (701). Next was ten drums of waste solvent (548). In the second row was two drums of still bottoms (740). All drums were closed, labeled, in good condition, and dated since May 10, 2021, 90 days prior to the inspection. The second containment area immediately north of the area holding hazardous waste had numerous empty drums on their sides, three drums of used oil and seven drums of dirty jet fuel. These drums were in good condition and labeled as such. The jet fuel has a flash point above 60ºC similar to diesel fuel. This central accumulation area had a hand-held fire extinguisher and a spill kit. Personnel working in the area had access to radios and cell phones. There was no readily available fire-fighting water in this area. **NOPF #1: 40 CFR 265.32(d), Failure to have at outside central accumulation area, water at adequate volume and pressure to supply water hose streams, or etc.**

4.3.11 Hanger E

Duncan Aviation maintains an SAA in Hanger E to accept waste from a small paint booth (Photograph 13). Two 5-gallon step cans accept hazardous waste wipes (553) and hazardous waste masking materials (554). A 55-gallon drum accepts hazardous paint waste (548). The containers were labeled, closed, and in good condition.

4.3.12 Hanger D, Upholstery

Duncan Aviation maintains an SAA in the Upholstery Department to accept waste from a small paint booth. There were containers for aerosol cans (549), hazardous waste wipes (553) and hazardous paint waste (548). The containers were labeled, closed, and in good condition.

4.3.13 Hanger D, Interior Completions

Duncan Aviation maintains an SAA in the Interior Completions Department to accept waste from a small paint booth. There were containers for hazardous waste masking materials (554), hazardous paint waste (548), and hazardous waste wipes (553). The containers were labeled, closed, and in good condition.

4.3.14 Hanger D, South

Duncan Aviation maintains an SAA in the South Hanger to accumulate hazardous wastes. There were containers for aerosol cans (549) and hazardous waste wipes (553). The containers were labeled, closed, and in good condition.

4.3.15 Hanger D, North

Duncan Aviation maintains an SAA in the North Hanger to accumulate hazardous wastes. There were containers for aerosol cans (549) and hazardous waste wipes (553). The containers were labeled, closed, and in good condition.

4.3.16 Hanger D, Fabrication Shop

Duncan Aviation maintains an SAA in the Fabrication Shop to accumulate waste from a small paint booth. There were containers for hazardous waste masking materials (554), hazardous paint waste (548), and hazardous waste wipes (553). The containers were labeled, closed, and in good condition.

4.3.17 Hanger D, Finish Shop

Duncan Aviation maintains an SAA in the Finish Shop to accumulate hazardous paint waste (548). The container was labeled, closed, and in good condition.

4.3.18 Hanger G, Structures

Duncan Aviation maintains an SAA in the Structures Department to accumulate hazardous wastes. There were containers for hazardous waste masking materials (554), hazardous paint waste (548), and aerosol cans (549). This area also had a 55-gallon poly-drum containing Etch and Alodine hazardous wastewater. When full, the drum is taken to the wastewater treatment unit in Building 5600 (Hangers 1 and 2). The facility generates three to four of these drums each week. The containers were labeled, closed, and in good condition.

4.4 Document Review

After touring the facility and breaking for lunch, I sat in Mr. Frye's office and reviewed various records relevant to RCRA compliance.

4.4.1 Accumulation Area Inspections

Mr. Becker provided copies of the weekly hazardous waste inspection checklists from January 1, 2018, to the present. These records appeared complete. The inspection format changed on January 25, 2018, to include more descriptions of the accumulation areas instead of check marks. Some reports properly identified issues and the corrective actions taken to rectify the issues. Inspections were typically performed by Mr. Becker.

4.4.2 Manifests

I reviewed copies of hazardous waste manifests, used oil bills of lading, and universal waste bills of lading maintained by Duncan Aviation. I compared these manifests with the manifest report downloaded from RCRAInfo. Manifests appeared to be complete from 2018 through the present.

4.4.3 Contingency Plan

I reviewed Duncan Aviation's contingency plan. The plan was complete and up to date except it did not clearly show evacuation routes from the various buildings, although rally areas where occupants are to assemble were clearly shown and evacuation team leaders were listed (Attachment 8). Mr. Becker had information demonstrating arrangements had been made with emergency authorities (Attachment 9), but that documentation was not in the contingency plan. In an effort to prepare for the generator improvements rule that NDEE will soon be adopting, Duncan Aviation developed a quick reference guide (Attachment 6). The QRG was well conceived although it did not completely list all hazardous wastes generated on site or their points of generation. Duncan Aviation continues to develop this QRG in anticipation of the new regulations. **The facility contingency plan was mostly complete except for detailed evacuation routes and documentation of arrangements with emergency authorities.**

4.4.4 Training Records

I reviewed training records associated with hazardous waste management at Duncan Aviation (Attachment 10). Mr. Becker provided a copy of 2020 training records for himself, Radomir Brajic, and Bernard Schriner. He provided a copy of class registration for Mason Swarts who was a new hire. I also observed that Mr. Becker had training records for the past three years for each hazardous waste employee. A copy of Radomir Brajic's record is included as an example. Mr. Becker provided copies of position descriptions for four jobs including his own (Attachment 11). The training records and position descriptions appeared to be in order.

5.0 SUMMARY

I determined Duncan Aviation to be a large quantity generator of hazardous waste, a used oil generator, and a small quantity handler of universal waste lamps and batteries based upon the amount and type of waste generated at the time of my inspection. Hazardous waste requirements reviewed during this inspection are discussed above.

I issued a NOPF during the closeout meeting at the end of the inspection. The NOPF identified the following preliminary finding:

NOPF #1: 40 CFR 265.32(d), Failure to have at outside central accumulation area, water at adequate volume and pressure to supply water hose streams, or etc.

The EPA will be reviewing my findings further after the inspection and may change or add to these findings.

Edwin G. Buckner

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Edwin G. Buckner PE
Environmental Engineer
ECAD/CB/RCRA, EPA Region 7

CANDACE BEDNAR

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

Attachments

1. Business Cards (1 page)
2. Inspector Site Info Verification Report (1 page)
3. Confidentiality Notice (1 page)
4. Receipt for Documents and Samples (1 page)
5. Notice of Preliminary Findings (1 pages)
6. Quick Reference Guide with Facility Map (9 pages)
7. Waste Stream Tables (3 pages)
8. Select Portions of the Contingency Plan (4 pages)
9. Attendance List of Meeting with Emergency Authorities (2 pages)
10. Training Records (13 pages)
11. Position Descriptions (7 pages)

Photo Log (2 pages)
Photographs (14 pages/14 photos)

Notice of Preliminary Findings
Media: RCRA

Facility Name: Duncan Aviation, Inc.
Facility Address: 3701 Aviation Road
Lincoln, Nebraska 68524
EPA ID#: NED 980971733 **Date:** 8-10-21

This notice is provided to call your attention to the following preliminary findings regarding state and federal regulations. This notice does not constitute a compliance order and may not be a complete listing of all findings resulting from the inspection.

Citation	Description of Finding
40 CFR 265.32(d)	Failure to have, at outside central accumulation area, water at adequate volume and pressure to supply water hose streams, or etc.

As a continuation of the inspection performed at your facility, you are asked to submit a written response within 14 calendar days of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U.S. Environmental Protection Agency
Region 7, Enforcement & Compliance Assurance Division (ECAD)
11201 Renner Boulevard, Lenexa, KS 66219
ATTN: RCRA Section

If you have any questions about this Notice or wish to discuss your response, you may call me at 913-551-7621, or Mike Martin (Compliance Officer) at 913-551-7149.

This Notice prepared by Edwin G. Buckner Date: 8-10-21
Buckner.edwin@epa.gov

The undersigned person herby acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: Kelly Becker
Signature: Kelly Becker
Title: Environmental Supervisor
Date: 8-10-2021

(Rev: 2/25/2020) White Original/ EPA •Yellow/ Facility