

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

**Cessna Aircraft Co
One Cessna Drive
Independence, Kansas 667301**

EPA ID Number: KSR000003392

On

August 2, 2022

By

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

1.0 INTRODUCTION

I performed a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Cessna Aircraft Co (Cessna), located at One Cessna Boulevard, Independence, Kansas, on August 2, 2022. I conducted the RCRA inspection under the authority of RCRA Section 3007(a), as amended. The inspection was conducted jointly with the Kansas Department of Health and Environment (KDHE). 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), Used Oil Generator, and a Small Quantity Universal Waste Handler (SQUWH).

2.0 PARTICIPANTS

Cessna

Clinton Crowe, Environmental Health, and Safety Engineer
Christopher Cox, Environmental Health, and Safety Intern

KDHE

John Stover, Compliance and Regulatory Specialist

Environmental Protection Agency Region 7 (EPA)

Kenneth Herstowski, Environmental Engineer, ECAD/Chemical Branch/RCRA Section

3.0 Previous RCRA CEI

Cessna was last inspected for compliance with RCRA on May 16 – 17, 2018, by the EPA. The report identified the following potential findings or violations in the following areas:

- Update Contingency Plan with new emergency coordinators
- Update Contingency Plan to include signals used to initiate facility evacuation

4.0 INSPECTION PROCEDURES

I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.1D), unless noted differently. The inspection was unannounced. I completed checklists and other inspection related documents and collected photocopies. I collected 26 photographs with a digital camera and prepared a photographic log (attachments 1 and 2). I obtained copies of records from the facility as detailed in the sections that follow. I obtained five aerial photographs of the facility using Google Earth Pro (attachment 3). I obtained two facility maps of Cessna during the inspection (attachment 4). I prepared a Notice of Preliminary Findings (NOPF) as a result of my inspection (attachment 5). Documents and records were collected during the inspection and a Receipt for Documents and Samples was prepared (attachment 6). A Confidentiality Notice in which a claim of confidential business information was not asserted by Cessna (attachment 7).

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.

August 2, 2022

At about 09:00 on August 2, 2022, I rallied with Mr. Stover at an offsite location for a pre-inspection meeting. We caravanned to the Cessna facility arriving at approximately 09:19. A drive-by visual observation was completed from Cessna Boulevard (north side of the facility) and Russ Meyer Boulevard (east side of the facility). No issues were identified from the drive-by visual inspection. The facility was operational with onsite vehicle traffic and personnel movement. We parked in a facility parking lot adjacent to the Customer Delivery Building and entered the building through the public entrance. We introduced ourselves to the receptionist in the lobby, described the purpose of our visit was to conduct a CEI and identified Mr. Clinton Crowe as the site contact. The receptionist telephoned to located Mr. Crowe and re-directed us to the security station at the Assembly Building located at the north end of Cessna's facility. Mr. Stover and I returned to our cars and drove to the Assembly Building, parked in the visitor parking area, and entered the building. The security guard contacted Mr. Crowe who arrived shortly thereafter in the security lobby accompanied by Mr. Cox. Mr. Stover and I introduced ourselves and stated that the purpose of the visit was to conduct a hazardous waste compliance evaluation inspection, after which Mr. Crowe led us to a conference room for an entrance conference.

I presented my EPA credentials to Messrs. Cox and Crowe. I provided a copy of RCRA Section 3007 and reviewed the EPA's inspection authority. Mr. Crowe provided verbal consent to proceed with the inspection. I described the importance of collecting accurate information and provided a copy of Title 18 United States Code, Sections 1001 and 1002, which provides for penalties if false and/or misleading information is provided to Federal representatives, and for the possession and use of fraudulent documents. I discussed Cessna's confidentiality rights and described a Confidentiality Notice to be provided at the end of the inspection to make a confidential business information (CBI) claim. I provided a copy of EPA Region 7's "Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with

Inspections.” Messrs. Cox and Crowe acted as the primary facility representatives during the inspection activities.

I explained the purpose, scope, and procedures for the RCRA CEI. I provided my prepared records request (attachment 8). I reviewed the planned monitoring with a Thermo Fisher TVA2020 Toxic Vapor Analyzer (EPA FID) and a FLIR Systems GF-320 Optical Gas Imaging Camera (EPA Gas Imaging Camera). After the entrance discussions, I conducted a visual inspection of the Assembly Building, Flight Building, Sand and Fill Building, Paint Building and Chemical Storage Building (attachment 4). Messrs. Cox and Crowe accompanied Mr. Stover and me during the visual inspection. Following the visual inspection of the facility, we returned to the conference room to review facility records with Mr. Crowe.

Following the records review, I held an exit conference with Mr. Crowe. I reviewed the purpose and scope of the RCRA CEI. I reviewed the notice “Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections” and provided the Confidentiality Notice which Mr. Crowe signed without a confidential business information claim and provided a copy (yellow copy of the completed carbonless transfer sets) to Mr. Crowe. I provided a Receipt for Documents and Samples which Mr. Crowe signed and provided a copy (yellow copy of the completed carbonless transfer sets) to Mr. Crowe. I reviewed my findings from the NOPF which Mr. Crowe signed and provided a copy (yellow copy of the completed carbonless transfer sets) to Mr. Crowe. I departed the facility following the exit conference.

5.0 FINDINGS AND OBSERVATIONS

5.1 General Information/Facility Description

Cessna is located on the east side and adjacent to the City of Independence airport in which is southwest of the main portion of Independence, in central Montgomery County, Kansas. Cessna is located on approximately 216 acres with the seven campus buildings totaling approximately 370,000 square feet¹. Construction of the facility began in 1994 and production of aircraft began in 1996. The facility manufactures single engine propeller and twin-engine turboprop aircraft models. Cessna employs approximately 500 personnel (including embedded contractor personnel) at the facility. Production occurs over two shifts per day, 06:00 to 16:30 and 16:30 to 03:00, Monday through Thursday.

Cessna assembles aircraft from components manufactured at other Cessna facilities and other component suppliers in the Assembly Building. After assembly, the aircraft are moved to the Sand and Fill Building or Booth 5 of the Paint Building (depending on the type of aircraft) where the exterior is hand sanded to prepare the aircraft for painting. The aircraft are painted in the Paint Building in one of four painting booths (Booths 1 – 4). The aircraft interiors are installed in the Paint Building. The aircraft is moved to the Flight Building for final check out and preparation for the test flight. The completed aircraft is moved to the Delivery Building for acceptance by the customer.

The assembly process utilizes hazardous materials such as solvents for cleaning, chrome primer (Alodine) kits, sealers, paint, and paint solvents.

5.2 RCRA Status

The Notification Acknowledgement/Verification Report (attachment 9) indicates that Cessna is a large quantity generator. Mr. Crowe stated Cessna also generates used oil and universal waste. I reviewed the site verification

¹ EPA RCRA CEI report of May 16 – 17, 2018.

report with Mr. Crowe who did not identify any updates. I determined at the time of my inspection that Cessna was generating greater than 1,000 kilograms of hazardous waste per month based upon e-manifest data for 2021. Based on this information, I reviewed Cessna for compliance with large quantity generator, used oil and small quantity handler of universal waste requirements during my inspection.

5.3 Waste Streams and Management

I reviewed Cessna hazardous waste generation with Mr. Crowe. The following major hazardous waste streams have been shipped offsite to treatment, storage, and disposal facilities. Cessna uses process knowledge, safety data sheets and analytical testing to make hazardous waste determinations and identify applicable hazardous waste codes.

Remainder of page intentionally blank

Waste Stream	[pounds] 2021 Biennial Report	Waste Codes	Process	On Site Management	Off Site Management
Flammable Solids (Paint Filters, Rags and Debris, Solvent Wipes, Wastewater Treatment Plant (WWTP) Filter Socks)	94,840	D001 D006 D007 D026 D035	Paint filters, rags, debris (floor sweepings, personal protective equipment (PPE)) are generated in the Paint Mixing Room and Paint Booths. Solvent wipes, debris (floor sweepings, PPE) are generated during aircraft assembly WWTP Filter Socks are generated at the WWTP where wash water from washing down paint booths where the sanding of chrome primer is conducted.	Accumulated in 55-gallon Satellite Accumulation containers in Paint Mixing Room and Paint Booths. Filled containers are moved to the Chemical Storage Building. Initially accumulated in day containers located at aircraft workstations throughout the facility. Day containers are consolidated into 55-gallon Satellite Accumulation containers located at various locations near the point of generation. Filled Satellite Accumulation containers are moved to the Chemical Storage Building. Filter Socks removed from the WWTP are accumulated in a 55-gallon Satellite Accumulation container. Filled containers are moved to the Chemical Storage Building. Satellite Accumulation containers of Flammable Solids are consolidated into a 40 cubic yard roll-off container at the Chemical Storage Building.	Rineco Chemical Industries Benton, AR ARD981057870 H141 – Storage, Bulking, Off-Site Transfer

Waste Stream	[pounds] 2021 Biennial Report	Waste Codes	Process	On Site Management	Off Site Management
Mixed Flammable Liquids (Paint, Paint Solvents, Cleaning Solvents, Aerosol Can Puncturing)	78,527	F003 D001 D006 D007 D026 D035	Unused Paint and Paint Solvents are generated in the Paint Mixing Room and Paint Booths. Solvents from pre-packaged solvent wipes used throughout the facility. Various aerosol products used for aircraft assembly.	Accumulated in 55-gallon Satellite Accumulation containers in Paint Mixing Room and Paint Booths. Filled containers are moved to the Chemical Storage Building. Accumulated in 55-gallon Satellite Accumulation containers. Filled containers are moved to the Chemical Storage Building. Cans are accumulated in 55-gallon containers at various locations throughout the facility. Filled containers are moved to the Chemical Storage Building where they are punctured and drained into an accumulation container (55-gallon accumulation container has puncturing device affixed to the container in the Chemical Storage Building).	Heritage Environmental Services Kansas City, MO MOD981505555 H061- Fuel Blending Heritage Thermal Services East Liverpool, OH OHD980613541 H040- Incineration
Floor Drain Sludge	1,611	D007	Sludge removed from paint booth floor drain sumps in Booths 5, 7, and 8, where chromium containing paint is sanded. Sumps are cleaned up to two times per year during facility shutdowns in July and December.	Sludge is placed into 55-gallon containers in the paint booths and moved to the Chemical Storage Building.	Heritage Environmental Services Kansas City, MO MOD981505555 H141- Bulking/Off Site Transfer

Waste Stream	[pounds] 2021 Biennial Report	Waste Codes	Process	On Site Management	Off Site Management
Primer Kits (Alodine Contaminated Debris)	2,206	D002, D007	Unused portions of Alodine primer kits used to touch up defects on aircraft surfaces.	Accumulated in 55-gallon Satellite Accumulation containers. Filled containers are moved to the Chemical Storage Building.	Heritage Environmental Services Kansas City, MO MOD981505555 H141- Bulking/Off Site Transfer
Used Batteries	Not determined	Universal Waste	Discarded batteries from equipment used in aircraft manufacture. Batteries include alkaline, silver oxide, nickel/cadmium, and lithium.	Accumulated in 5-gallon containers at various locations at the facility.	Heritage Environmental Services Kansas City, MO MOD981505555
Lead Acid Batteries	Not determined	Recycled (40 CFR 266, Subpart G)	Discarded lead acid batteries from forklifts and other equipment.	Accumulated at the Chemical Storage Building.	CMC Recycling Independence, MO Recycling
Crushed Lamps	Not determined	Non-hazardous	Fluorescent lamps removed from lighting fixtures.	Bulbs are crushed with equipment affixed to the top of a 55-gallon container at the Chemical Storage Building.	Heritage Environmental Services Kansas City, MO MOD981505555
Universal Waste Lamps	Not determined	Universal Waste	Mercury containing lamps removed from service.	Accumulated in 55-gallon containers at the Chemical Storage Building.	Heritage Environmental Services Kansas City, MO MOD981505555 Recycling

Waste Stream	[pounds] 2021 Biennial Report	Waste Codes	Process	On Site Management	Off Site Management
Used Oil	Not determined	Used Oil	Used oil from aircraft and equipment maintenance.	Accumulated in 55-gallon containers at various facility locations and in two 300-gallon tanks at the Flight Building.	GFL Environmental Kansas City, MO Recycling

I reviewed the 2021 RCRA Biennial Report for Cessna from the EPA RCRAInfo v6 database. The biennial report is consistent with the waste generation and e-manifest information.

5.4 Hazardous Waste Accumulation

Cessna accumulates hazardous waste for less than 90 days at the Chemical Storage Building (attachment 4). Mr. Stover and I visually inspected hazardous waste accumulation on August 2, 2022. Mr. Stover and I were accompanied during the visual inspection by Messrs. Cox and Crowe. Working in the area was Mr. Roger Fisher. The area includes an enclosed building for chemical storage and covered outdoor areas. Containers of hazardous waste are accumulated for less than 90-days in the outdoor covered areas (page 4, attachment 3).

I observed six containers of Floor Drain Sludge (photograph 11, attachment 1). The containers were closed, in good condition, marked "hazardous waste," and included accumulation start dates. The accumulation start date on all the containers was July 2, 2022.

I observed 21 containers of Mixed Flammable Liquids (photograph 12, attachment 1). The containers were in good condition, marked "hazardous waste," and included accumulation start dates. I noted that the two-inch bungs in the top of 12 of the containers had been loosened where they could be opened without tools. Mr. Fisher described that due to the hot weather conditions he had loosened the bungs to vent pressure from the containers so that they would not deform. I provided compliance assistance regarding properly closing containers when not releasing pressure or when they are unattended. Mr. Fisher re-tightened the container bungs during the visual inspection. The most mature accumulation start date of the containers observed was June 20, 2022.

I observed two containers of Primer Kits (photograph 13, attachment 1). The containers were closed, in good condition, marked "hazardous waste," and included accumulation start dates. The most mature accumulation start date of the containers observed was June 15, 2022.

I observed one 40 cubic yard roll-off compactor receiver container of Flammable Solids. A roll-off compactor receiver container is specially designed to attach to a compactor unit and retain all compacted refuse. The container was in good condition, marked "hazardous waste," and included an accumulation start date of July 5, 2022 (photograph 20, attachment 1). I noted the opening to the compactor had a visible gap (photographs 21 and 22, attachment 1). Mr. Fisher described that he was in the process of emptying the Flammable Solids Satellite Accumulation containers into the compactor when we arrived at the Chemical Storage Building. He pointed out the closure devices that would be used to compress the lid of the compactor to eliminate the visible gap. I observed an empty compactor receive and noted the closure on the front when the compactor is removed (photograph 23, attachment 1).

I observed one container of Mixed Flammable Liquids inside the Chemical Storage Building (photograph 18, attachment 1). The container was being used to collect liquids drained from aerosol cans. The cans are punctured using the attached fixtures in the bung opening in the top of the container. The container was closed, in good condition, marked "hazardous waste," and included an accumulation start date. The accumulation start date observed was July 14, 2022.

I observed portable fire extinguishers, spill kits and a telephone which can be used to summon assistance, and a fire alarm pull station at the Chemical Storage Building. Mr. Fisher has a Cessna issued mobile phone which can also be used to summon assistance.

I observed no apparent issues or findings related to the less than 90-day hazardous waste accumulation at the Chemical Building.

See Section 5.7 for the discussion of air emission requirements for containers.

5.5 Satellite Accumulation

Cessna utilizes Satellite Accumulation² of hazardous waste in the Assembly Building, Flight Building, Sand and Fill Building, and Paint Building. Mr. Stover and I visually inspected Satellite Accumulation in these buildings on August 2, 2022. We were accompanied during the visual inspection by Messrs. Cox and Crowe. In each of the buildings visually inspected, I observed portable fire extinguishers, spill kits, and a fire alarm pull stations. Telephones are also located nearby to summon assistance.

5.5.1 Assembly Building

In the Assembly Building, Cessna utilizes Satellite Accumulation for Flammable Solids, Mixed Flammable Liquids, and Primer Kits. Cessna utilizes day accumulation containers as described in KDHE guidance³. Multiple day accumulation containers are located at each of the workstations in the Assembly Building to facilitate the collection of Flammable Solids during aircraft assembly (photograph 9, attachment 1). The day accumulation containers are emptied at the end of each shift into a Satellite Accumulation container located within line of sight of the workstation.

I observed seven Flammable Solids Satellite Accumulation containers in the Assembly Building. Photographs were taken depicting typical condition of the containers and labeling (photographs 1, 7, and 8, attachment 1). The observed Flammable Solids containers were closed, labeled “hazardous waste,” and in good condition.

I observed two Mixed Flammable Liquids Satellite Accumulation containers in the Assembly Building. A photograph was taken depicting typical condition of the containers and labeling (photograph 3, attachment 1). The observed Mixed Flammable Liquids containers were closed, labeled “hazardous waste,” and in good condition.

I observed two Aerosol Cans Satellite Accumulation containers in the Flight Building. A photograph was taken depicting typical condition of the containers and labeling (photograph 5, attachment 1). The observed Aerosol Cans containers were closed, labeled “hazardous waste,” and in good condition.

I observed no apparent issues or findings related to Satellite Accumulation of hazardous waste at the Assembly Building.

5.5.2 Flight Building

I observed two Flammable Solids Satellite Accumulation containers in the Flight Building. A photograph was taken depicting typical condition of the containers and labeling (photograph 24, attachment 1). The observed Flammable Solids containers were closed, labeled “hazardous waste,” and in good condition.

² Satellite accumulation is a term of art for the situation where the generator accumulates hazardous waste in containers at or near any point of hazardous waste generation. The pertinent requirements are found at 40 CFR 262.34(c)(1), et seq. (K.A.R. 28-31-262).

³ KDHE describes in Technical Guidance Document HW-2005-G1 the use of a Day Accumulation Container. The guidance provides conditions under which the Day Accumulation Container must be managed.

I observed one Aerosol Cans Satellite Accumulation container in the Flight Building (photograph 24, attachment 1). The observed Aerosol Cans container was closed, labeled “hazardous waste,” and in good condition.

I observed no apparent issues or findings related to Satellite Accumulation of hazardous waste at the Flight Building.

5.5.3 Sand and Fill Building

I observed four Flammable Solids Satellite Accumulation containers in each of the two paint booths at the Sand and Fill Building. The observed Flammable Solids containers were closed, labeled “hazardous waste,” and in good condition.

I observed one Mixed Flammable Liquids Satellite Accumulation container in each of the two paint booths at the Sand and Fill Building. The observed Mixed Flammable Liquids containers were closed, labeled “hazardous waste,” and in good condition.

I observed no apparent issues or findings related to Satellite Accumulation of hazardous waste at the Sand and Fill Building.

5.5.4 Paint Building

I observed Flammable Solids Satellite Accumulation containers in each of the seven paint booths at the Paint Building. The observed Flammable Solids containers were closed, labeled “hazardous waste,” and in good condition.

I observed Flammable Solids Satellite Accumulation containers in the Paint Mixing Room at the Paint Building (photograph 26, attachment 1). The observed Flammable Solids container was closed, labeled “hazardous waste,” and in good condition.

I observed one Mixed Flammable Liquids Satellite Accumulation container in each of the seven paint booths at the Paint Building. The observed Mixed Flammable Liquids containers were closed, labeled “hazardous waste,” and in good condition.

I observed one Mixed Flammable Liquids Satellite Accumulation container in the Paint Mixing Room at the Paint Building (photograph 26, attachment 1). The observed Mixed Flammable Liquids container was closed, labeled “hazardous waste,” and in good condition.

I observed one Flammable Solids Satellite Accumulation container in the Wastewater Treatment Plant at the Paint Building. The observed Flammable Solids container was closed, labeled “hazardous waste,” and in good condition.

I observed no apparent issues or findings related to Satellite Accumulation of hazardous waste at the Paint Building.

5.6 Subpart BB Leak Detection and Repair

The EPA promulgated requirements for the control of air emissions from equipment leaks at 40 CFR Part 264/265, Subpart BB (hereafter “Subpart BB”). The State of Kansas has adopted by reference the EPA’s requirements for generators of hazardous waste found at 40 CFR Part 262. I did not observe equipment which might be subject to Subpart BB during my visual inspection on August 2, 2022.

5.7 Subpart CC Container Air Emissions

The EPA promulgated requirements for the control of air emissions from tanks, surface impoundments, and containers at 40 CFR Part 265, Subpart CC (hereafter “Subpart CC”). The State of Kansas has adopted by reference the EPA’s requirements for generators of hazardous waste found at 40 CFR Part 262. Cessna is subject to Subpart CC for containers accumulating hazardous waste (large quantity hazardous waste generator requirements) with an average volatile organic concentration at the point of generation greater than 500 parts per million by weight. The requirements of Subpart CC vary depending on the size of the container and the concentrations and vapor pressures of organic constituents. Mr. Stover and I visually inspected containers at the Chemical Storage Building on August 2, 2022, accompanied by Messrs. Cox and Crowe.

I observed a 40 cubic yard roll-off compactor receiver container to consolidate the contents of the Flammable Solids Satellite Accumulation containers. Cessna has determined the Flammable Solids are not in light material service therefore Subpart CC Level 1 controls are appropriate for the container. I obtained the waste profile for the Flammable Solids (attachment 10). As discussed above in 5.4, I observed a visible gap on the sides of the cover to the compactor. Level 1 controls require the container to be covered with no visible cracks or gaps in the cover except when adding or removing hazardous waste. Mr. Fisher stated that he had been compacting Flammable Solids when we arrived at the Chemical Building.

I observed Floor Drain Sludge, Mixed Flammable Liquids and Primer Kits being accumulated in 55-gallon United States Department of Transportation (USDOT) containers. Subpart CC Level 1 controls are appropriate for 55-gallon containers irrespective of the material service. As discussed above in 5.4, I observed the bungs in 12 of the Mixed Flammable Liquids containers were loose. Level 1 controls require the container to be closed except when adding or removing waste. Level 1 controls also allow for the container to be opened and closed to release pressure. Mr. Fisher stated that he had loosened the bungs to allow the containers to release pressure before we arrived at the Chemical Building. While Mr. Stover and I were conducting the visual inspection at the Chemical Building, Mr. Fisher re-tightened the bungs on the Mixed Flammable Liquids containers.

I observed no apparent issues or findings related to Subpart CC at the Chemical Storage Building.

5.8 Inspections

Cessna conducts weekly inspections of the less than 90-day hazardous waste accumulation area at the Chemical Building. The inspections are documented in a log. I reviewed the inspection logs for the period of January 2019 through the week of my CEI. I obtained a copy of the most recent inspection log (attachment 11).

Cessna reviews the Satellite Accumulation in each of the buildings monthly. I obtained a copy of the most recent inspection log (attachment 11).

I observed no apparent issues or findings related to review of the inspection records provided.

5.9 Contingency Plan

I asked to review the current RCRA Contingency Plan. I was provided a copy of the Contingency Plan dated August 2021 (attachment 12).

I observed no apparent issues or findings related to my review of the contingency plan provided.

5.10 Training Requirements

I reviewed personnel training with Mr. Crowe. Mr. Crowe described the training required for Cessna employees consists of initial training consisting of instruction and on the job training within six months for new hires and annual in person training modules. I reviewed the annual RCRA refresher training slide decks for 2019, 2020, and 2021. Mr. Crowe stated that the 2022 training is scheduled for later this year in the fall. I obtained a copy of the 2021 training slide deck and attendance roster (attachment 13).

Notice of Preliminary Finding (NOPF) 2 - K.A.R. 28-31-262(a) → 40 Code of Federal Regulations (CFR) 262.34(a)(4) → 265.16(d)(4): Training records for 2019

The State of Kansas has adopted by reference the EPA's requirements for generators of hazardous waste found at 40 Code of Federal Regulations (CFR) Part 262⁴. The requirements for large quantity hazardous waste generators accumulating hazardous waste for less than 90 days are found at 40 CFR 262.34(a). The requirement at 40 CFR 262.34(a)(4) requires large quantity generators to provide personnel training in the safe handling and management of hazardous waste found in 40 CFR 265.16. In pertinent part, 40 CFR 265.16(d)(4) requires *"Records that document that the training or job experience required under paragraphs (a), (b), and (c) of this section has been given to, and completed by, facility personnel."*

I reviewed the training records included with the 2019, 2020, and 2021, annual RCRA refresher training slide decks. The 2020 and 2021 slide decks included sign in sheets for the persons attending the training. I did not find a sign in sheet for 2019. I identified the missing sign in sheet to Mr. Crowe who subsequently consulted with personnel in the Wichita corporate offices regarding the missing record. After this consultation, Mr. Crowe stated that the 2019 training records were missing and described a recent audit of training records identified the record was missing and a subsequent records search failed to find the record.

5.11 Manifests

I reviewed hazardous waste manifests information available in EPA's E-Manifest system from June 30, 2018, to present. I reviewed approximately 22 manifests for January 1, 2022, to the date of my CEI while on site.

I observed no apparent issues or findings related to my review of the provided hazardous waste manifests.

5.12 Universal Waste

Cessna is a small quantity handler of universal waste lamps and batteries. Universal waste lamps are accumulated in the Lab Supply Building within the area of the Waste Pad (page 2, attachment 3).

5.12.1 Universal Waste Lamps

⁴ See K.A.R. 28-31-262. Generators of hazardous waste; adoption and modification of federal regulations. In pertinent part, Kansas has adopted the provisions of 40 CFR part 262, including the appendix, as in effect on July 1, 2006.

NOPF 1 - K.A.R. 28-31-273(a) → 40 CFR 273.14(e): Container of HID Lamps not labeled “Universal Waste – Lamp(s)”

The State of Kansas has adopted by reference the EPA’s requirements for the management of Universal Wastes found at 40 CFR Part 273⁵. The requirements for Universal Waste labeling/marketing are found at 40 CFR 273.14. In pertinent part, 40 CFR 273.14(e) requires “*Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: “Universal Waste - Lamp(s),” or “Waste Lamp(s),” or “Used Lamp(s).”*”

Mr. Stover and I visually inspected the universal waste lamp accumulation in the Chemical Storage Building on August 2, 2022, accompanied by Messrs. Cox and Crowe. I observed a full 55-gallon container of universal waste (photograph 13, attachment 1). The container label identified the contents as HID Lamps. The label included a USDOT shipping name of “Non-DOT/Non-RCRA Regulated, (Universal Waste – Mercury Lamps)” and an accumulation start date of September 9, 2021. The label contained the words “Universal Waste” but did not have the required statement of “Universal Waste - Lamp(s),” or “Waste Lamp(s),” or “Used Lamp(s)” (photograph 14, attachment 1). I identified the missing label language to Mr. Crowe. Mr. Fisher then added “Lamps” to the label with a marker (photograph 15, attachment 1).

5.12.2 Universal Waste Batteries

Mr. Stover and I visually inspected the Universal Waste Batteries accumulation in the Assembly and Flight Buildings on August 2, 2022, accompanied by Messrs. Cox and Crowe. I observed Universal Waste Batteries being accumulated in 5-gallon plastic pails. In the Assembly Building I observed alkaline batteries accumulated at several location. Mr. Crowe described the alkaline batteries as consumer style batteries such as AA, C, D, sized batteries. Photograph were taken depicting typical condition of the containers and labeling (photographs 2 and 10, attachment 1).

In the Flight Building, I observed a 5-gallon plastic pail of Universal Waste Batteries (alkaline batteries). I observed to Mr. Crowe that the accumulation start date on the container was August 9, 2021. I provided compliance assistance regarding the one-year accumulation time limit for universal waste accumulation.

The observed Universal Waste Batteries containers were all closed, labeled “Used Batteries,” and included an accumulation start date on each container.

I observed no apparent issues or findings related to my review of the Universal Waste Batteries accumulated in the Assembly and Flight Buildings.

5.13 Recycled Lead-Acid Batteries

Mr. Stover and I visually inspected the lead-acid battery accumulation in the Chemical Storage Building on August 2, 2022, accompanied by Messrs. Cox and Crowe. Cessna accumulates lead acid batteries removed from forklifts and other equipment. Cessna has determined that the lead-acid batteries would be a hazardous waste

⁵ See K.A.R. 28-31-273 - Universal waste; adoption and modification of federal regulations. Kansas has adopted the provisions of 40 CFR part 273 as in effect on July 1, 2006.

but are managing them pursuant to the requirements in 40 CFR Part 266, Subpart G – Spent Lead-Acid Batteries Being Reclaimed⁶.

I observed two containers of lead-acid batteries in the Chemical Storage Building (photograph 16, attachment 1). The batteries were in good condition and no leaking electrolyte was observed.

I observed six forklift batteries on a pallet in the Chemical Storage Building (photograph 17, attachment 1). The batteries were in good condition and no leaking electrolyte was observed.

I observed no apparent issues or findings related to my review of the lead-acid batteries accumulated in the Assembly and Flight Buildings.

5.14 Used Oil

Cessna is a generator of used oil. Used oil is generated from the assembly of aircraft and servicing of equipment in the Assembly Building and the servicing of aircraft in the Flight Building. Mr. Stover and I visually inspected a used oil management on August 2, 2022, accompanied by Messrs. Cox and Crowe.

I observed used oil being accumulated in two approximately 300-gallon tanks inside a containment dike on the east side of the Flight Building (photograph 25, attachment 1). The tanks were in good condition and labeled “Used Oil.”

I observed used oil being accumulated in a 55-gallon container in the aircraft assembly area (photograph 6, attachment 1) and a 55-gallon container in the maintenance area in the Assembly building. The containers were in good condition and labeled “Used Oil.”

I observed no apparent issues or findings related to the management of used oil at the Assembly and Flight Buildings.

6.0 COMPLIANCE ASSISTANCE

I provided and reviewed with Mr. Assaf the following compliance assistance materials:

Section 3007 Inspections Sheet (EPA Handout)

RCRA Facility Access Information Sheet (EPA Handout)

United States Code 1001/1002 Annotated (EPA Handout)

Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections (EPA Handout)

Recycling and Disposal of Aerosol Cans, Technical Guidance Document HW-2002-G2 (KDHE Handout)

Requirements for Handlers of Universal Waste Technical Guidance Document HW-2001-G1 (KDHE Handout)

Solvent-Contaminated Wipes Technical Guidance Document HW-1995-G (KDHE Handout)

Bureau of Waste Management Policy 2013-P2 related to Solvent-Contaminated Wipes (KDHE Handout)

Spent Fluorescent Lamps Containing Mercury Technical Guidance Document HW-1995-G1 (KDHE Handout)

Characteristic and Listed Hazardous Wastes Technical Guidance Document HW-2011-G2 (KDHE Handout)

⁶ See K.A.R. 28-31-266 - K.A.R. 28-31-266 – Specific hazardous wastes and specific types of hazardous waste management facilities; adoption and modification of federal regulations. as in effect on July 1, 2006.

7.0 SUMMARY

I conducted an inspection of Cessna as a large quantity generator of hazardous waste, small quantity handler of universal waste, and used oil generator. The following preliminary findings are noted as discussed above:

NOPF 1 - K.A.R. 28-31-273(a) → 40 CFR 273.14(e): Container of HID Lamps not labeled “Universal Waste – Lamp(s)”

NOPF 2 – K.A.R. 28-31-262(a) → 40 Code of Federal Regulations (CFR) 262.34(a)(4) → 265.16(d)(4): Training records for 2019

Other than the items noted above, no other preliminary findings were noted. However, the EPA may review my findings further after the inspection, which may change or add to my findings.

Remainder of page intentionally blank

Herstowski, Ken Digitally signed by Herstowski, Ken
Date: 2022.08.17 15:15:31 -05'00'

Kenneth Herstowski
Environmental Engineer
RCRA Section, Chemical Branch
Enforcement and Compliance Assurance Division

Date

AMBER WHISNANT Digitally signed by AMBER WHISNANT
Date: 2022.10.24 13:10:43 -05'00'

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

Date

Attachments

1. Inspection [26] Photographs (27 pages)
2. Photographic Log (2 pages)
3. Aerial Photograph (5 pages)
4. Facility Map (2 pages)
5. Notice of Preliminary Findings (1 page)
6. Receipt for Documents (1 page)
7. Confidentiality Notice (1 page)
8. Records Request (2 pages)
9. Notification Acknowledgement/Verification Report (1 page)
10. Flammable Solids Waste Profile (13 pages)
11. Inspection Logs (2 pages)
12. Contingency Plan (27 pages)
13. RCRA Training (30 pages)