

INSPECTION REPORT

Inspection Entry Date/Time	01/15/2025 09:00 AM (CT)	Announced: No		
Inspection Exit Date/Time	01/15/2025 02:25 PM (CT)	Access: Granted		
Regulatory Program	Resource Conservation and Recovery Act (RCRA)			
Type of Inspection	Compliance Evaluation Inspection (CEI)			
Company Name	Geoquip Power Systems dba Hydraulic Power Systems (HPSI)			
Facility or Site Name	HPSI			
Facility/Site Identifier	MOD985821156			
Facility/Site Physical Address	1203 Ozark Street			
City, State, Zip Code	North Kansas City, MO 64116			
County/Borough	Jackson			
Generator Status	Small Quantity Generator (SQG)			
NAICS	333995			
Type of Operation	Manufacturing of deep foundation equipment			
Geographic Coordinates	39.1303, -94.56479			
Permit Number (If Applicable)	Not Applicable			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Mike Martin	Inspector	EPA REGION 7	martin.mike@epa.gov	(913) 551-7149
Jake Huff	Inspector	Missouri Department of Natural Resources (MoDNR)	jake.huff@dnr.mo.gov	
Lead Inspector:				
Donald Melton	[Signature] DONALD MELTON		Digitally signed by DONALD MELTON Date: 2025.02.24 09:44:20 -06'00'	[Date]
	EPA REGION 7	melton.donald@epa.gov		(913) 551-5021
Supervisor Review:				
		AMBER		Digitally signed by AMBER WHISNANT Date: 2025.03.06 17:42:06 -06'00'
Amber Whisnant	[Signature] WHISNANT			[Date]
	EPA REGION 7	whisnant.amber@epa.gov		

SECTION I – INTRODUCTION

Site Entry and Purpose of the Inspection

Type of inspection: Compliance Evaluation Inspection (CEI)

At the request of the Enforcement Compliance and Assurance Division, I conducted an unannounced RCRA CEI at HPSI, located at 1203 Ozark Street, North Kansas City, Missouri, at 9:00 a.m. (CT) on January 15, 2025. A drive-by of the facility was conducted prior to entering the building. No areas of concern were noted. Mr.

Martin, Mr. Huff and I entered the building's office, and I introduced myself to the Receptionist and requested to see Mr. Russell Kuda who is listed as the site contact. Mr. Kuda introduced himself and I provided my credentials to him and discussed the reason and general procedures of the inspection. I informed Mr. Kuda that this was an EPA Region 7 inspection to determine compliance with the RCRA. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. The inspection report and attachments present the results of the CEI. In addition, information gathered prior or subsequent to the Inspection from a review of USEPA, State, and public records may be included in this report.

The CEI consisted of a discussion of facility operations, waste generation, and waste management; a review of waste management records; and a visual inspection of waste generation and management areas. Document photocopies and photographs were collected as inspection documentation (Appendixes 1 and 2). A total of 9 photographs were collected and a photolog was prepared (Appendix 1). I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.1E), unless noted differently. Any authorized Federal regulatory citations noted in this report are adopted by reference in the authorized Missouri regulations.

HPSI had been last inspected for RCRA compliance on May 30, 2012, by the MoDNR. During the May 2012 MoDNR inspection, the following findings were cited:

1. 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.173(a) - Failure to close a container holding hazardous waste except when adding or removing waste.
2. 10 CSR 25-5.262(2)3.B - Failure to update notification as required.

Finding 1 above was repeated during this inspection and described in Observation DM7-OB-001 below.

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/EPA REGION 7	Donald Melton	(913) 551-5021	melton.donald@epa.gov	Yes	Yes
Inspector/EPA REGION 7	Mike Martin	(913) 551-7149	martin.mike@epa.gov	Yes	Yes
Environmental Specialist /MoDNR	Jake Huff		jake.huff@dnr.mo.gov	Yes	Yes
Operations Manager/HPSI	Russell Kuda	(816) 221-4774	Russell@4hpsi.com	Yes	Yes
Engineer/HPSI	Derrick smith	(816) 221-4774	derrick@4hpsi.com	Yes	Yes

Opening Conference

I explained the purpose and procedures of the inspection and presented Mr. Kuda with a copy of RCRA Section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented him with a copy of Title 18 U.S. Code, Sections 1001 and 1002 regarding false statements and documents. I discussed HPSI's confidentiality rights and informed that a Confidentiality Notice would be provided at the end of the inspection to make a confidentiality claim, if desired. I asked Mr. Kuda to review the Notification Acknowledgement/Verification Report (Appendix 2 - Attachment 1). According to the Notification Acknowledgement/Verification Report, HPSI operates as a SQG of characteristic hazardous waste (D001 and

D035) and listed hazardous waste (F003 and F005). Mr. Kuda indicated that there were no changes to be made to the Notification Acknowledgement/Verification Report. From my review of their past three years' uniform hazardous waste manifests and monthly hazardous waste generation rates, it appears that HPSI oscillates between a SQG and a conditionally exempt small quantity generator. In 2024, HPSI generated an estimate between 25 to 435 pounds of hazardous waste per month and accumulated greater than 220 pounds of hazardous waste prior to off-site disposal (four of nine 2024 hazardous waste shipments). At the time of the CEI, HPSI had accumulated greater than 220 pounds of hazardous waste (but less than 2,200 pounds of hazardous waste) on-site (Photos 1-3, 6, and 9). Therefore, I inspected HPSI as a SQG. In addition, I determined HPSI to be a used oil generator. See the Process Description Section for discussion of their monthly hazardous waste generation rates.

Facility/Site Information

Number of employees	15
Length of Facility at Location	Since 1980 (approximately 45 years)
Operating Hours	8 am to 5 pm Monday through Friday; weekends only as needed
Safety Training Provided to Inspector(s)?	Not required
Size of Facility	Approximately 20,000 sqft under roof
What type of generator facility notified?	SQG
What type of generator facility verified as?	SQG
Weather Conditions	Sunny, 38°F

Process Description

HPSI builds vibratory hammers which are deep foundation equipment making approximately 20 units per year. The facility will pre-make units or make specific orders to sell to their customers. The prebuilt units can take 3 or 4 months to make. The process at the facility is purchasing precut parts, welding precut parts, conducting stress relief process, then sending the products offsite to have products sand blasted and machined. After sand blasting and machining, the facility will receive their products and do any additional assembly and paint then ship off the vibratory hammers to customers.

Messrs. Martin, Huff and I conducted a visual inspection of the following areas:

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Central Accumulation Area (CAA)	Hazardous waste storage area	Yes
Mixing Booth	Paint mixing area	No
Office	Business offices	Yes
Shop	Manufacturing process	No
Parts Storage Area	Storage of parts and other general storage items	No

Inspection Date(s):

01/15/2025 - 01/15/2025

Facility Waste Streams and Management

Waste Description and Generation Process	Waste Type	Generation Rate	If HW, list all codes	Waste Determination Method	Waste Amount Presently in Storage	Oldest Accumulation Start Date	Waste Disposal Location
Waste Paint Material	HW	12-15 gallons per month	D001, D035, F003, F005	Process knowledge	~18 gallons	NA	Crystal Clean Various locations
Waste Aerosols	HW	~9 pounds per month	D001	Process knowledge	~9 pounds	NA	Crystal Clean Various locations
Used Paint Rags	HW	Varies	D001, D035, F003, F005	Process knowledge	~100 pounds	Not listed	Crystal Clean Various locations
Waste Paint Booth Filters	HW	~100 pounds per month	D035, F003, F005	Process knowledge	~300 pounds	12/27/2024	Crystal Clean Various locations
General Trash	SW	Varies	NA	NA	NA	NA	Ted's Trash Service, Inc. in Independence, Missouri
Used Filters	UO	Varies	NA	NA	NA	NA	Crystal Clean Various locations
Used Oil	UO	~500 gallons per year	NA	NA	325 gallons	NA	Crystal Clean Various locations
Lead-Acid Batteries (managed under 40 CFR 226 Subpart G)	EX	varies	NA	NA	NA	NA	Foley Equipment in Kansas City, Missouri
Waste Types AD = Analytical Data ND = Not Determined UO = Used Oil EX = Exempt SW = Solid Waste HW = Hazardous Waste UW = Universal Waste							

SECTION II – OBSERVATIONS

Building: CAA			
Observation #: DM7-OB-001	Date: 01/15/2025	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Russell Kuda		Title: Operations Manager	
During the visual inspection of the CAA, I observed eight (8) 55-gallon containers that contained degreaser			

product (two containers), used paint rags (one container), waste paint material (one container), waste paint booth filters (three containers), and one container of used oil filters mixed with fuel and hydraulic filters. The full container of used paint rags and the three full containers of waste paint booth filters were determined to be less than 180-day hazardous waste accumulation containers (hazardous waste storage containers). The container of waste paint related material was determined to be a hazardous waste satellite accumulation container. The four 55-gallon hazardous waste storage containers had drop off dates listed on them that were less than 180 days. However, Mr. Kuda stated these were the dates when the empty containers are dropped off by Crystal Clean and the dates did not reflect the correct hazardous waste accumulation start date. Mr. Kuda said he did not know the exact date of accumulation of one of four hazardous waste storage containers. Three (3) 55-gallon hazardous waste storage containers of waste paint booth filters (F003, F005, and D035) (Photo 3), had a drop off date of 9-26-2024. Mr. Kuda stated the accumulation start date was approximately December 27, 2024. Prior to the completion of the CEI, facility personnel labeled the three hazardous waste storage containers of waste paint booth filters with the December 27, 2024, accumulation start date (Photo 6). The 55-gallon hazardous waste storage container of used paint rags had a drop off date 8-13-24 (Photos 1-2) and was open (container lid was not secured). **Notice of Preliminary Finding - NOPF 3: 10 CSR 25-5.262.2(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(2) - Failure to mark the accumulation start date on hazardous waste storage containers. NOPF 1: 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.173(a) - Failure to keep a hazardous waste storage container closed during storage except when adding or removing waste.**

The 55-gallon hazardous waste satellite accumulation container of waste paint material (D001, D035, F003 and F005) (fourth container in photo 3) had a dropped off date of 12-16-2024. Mr. Kuda stated the hazardous waste satellite accumulation container is not full and is still being used to accumulate waste paint related material. The hazardous waste satellite accumulation container was in good condition, closed, and labeled with the words "Hazardous Waste."

I observed one 55-gallon container of used oil filters mixed with fuel filters along with hydraulic filters and one 330-gallon tote of used oil both not labeled with the words "Used Oil" (Photos 4-5). **NOPF 8: 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(c)(1) - Failure to label containers storing used oil with the words "Used Oil."** Prior to the completion of the CEI, facility personnel labeled the used oil storage containers with the words "Used Oil" (Photos 7-8).

During the visual inspection, I did not observe the emergency coordinator's name and phone number, the locations of emergency equipment, or the number of the telephone number of the fire department posted next to a telephone. **NOPFs 4a-c: 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)(A), (B), and (C) - Failure to post emergency preparedness information next to a telephone.** I asked Mr. Kuda about the procedures facility personnel take should an emergency occur. Mr. Kuda stated that employees have their personal phones to contact emergency services and all other emergency personnel. Mr. Kuda stated that there is an internal PA system used to communicate to the entire facility should an emergency occur. I asked Mr. Kuda who was the Emergency Coordinator. He stated that he was the Emergency Coordinator. Compliance assistance was given, and Mr. Kuda said that the emergency contacts and information would be posted next to a telephone closet to the CAA.

I asked Mr. Kuda if he conducts any inspections on hazardous waste storage containers in the CAA. Mr. Kuda stated that he conducted inspections about 2 or 3 times per month. I informed Mr. Kuda that HPSI must conduct weekly hazardous waste inspections. **NOPF 2: 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d) referencing 40 CFR 265.174 - Failure to conduct weekly hazardous waste inspections.**

Photo(s)

1. [IMG-20250115101120112090914.jpg](#)
2. [IMG-20250115101229122980797.jpg](#)
3. [IMG-20250115101419141994456.jpg](#)
4. [IMG-202501151023502350100539.jpg](#)
5. [IMG-20250115102457245793092.jpg](#)

Building: Paint Mixing Room

Observation #: DM7-OB-002 **Date:** 01/15/2025 **Contains AOC:** No **Contains CBI:** No

Person Interviewed: Narin (last name not obtained) **Title:** Painter

Mr. Kuda escorted us to the Paint Mixing Room, and we were able to speak to Mr. Narin about the product of epoxy, paints, and hardeners in the room. There were no mixing cups or any waste paint materials being generated at the time of inspection and noted no areas of concern.

Building: CAA

Observation #: DM7-OB-003 **Date:** 01/15/2025 **Contains AOC:** No **Contains CBI:** No

Person Interviewed: Russell Kuda **Title:** Operations Manager

Prior to the exit briefing, Mr. Kuda and Mr. Smith both stated that new accumulation start date labels had been added to three 55-gallon hazardous waste storage containers of waste paint booth filters (Photo 6). He also stated that Used Oil labels were placed on the two used oil storage containers (Photos 7-8).

Photo(s)

1. [IMG-202501151251165116104797.jpg](#)
2. [IMG-20250115125139513999566.jpg](#)
3. [IMG-202501151251555155109843.jpg](#)

Building: CAA

Observation #: DM7-OB-004 **Date:** 01/15/2025 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Russell Kuda **Title:** Operation Manager

The full 55-gallon hazardous waste storage container of used paint rags was verified closed (Photo 9). Note that the container did not have an accurate accumulation start date (NOPF 3) and had a drop off date 8-13-24. Mr. Kuda stated that the container of used paint rags was ready to be shipped off.

Photo(s)

1. [IMG-20250115125705575109723.jpg](#)

SECTION III – RECORDS REVIEW

Record: Manifests		
Ref #: DM7-RR-002	Reviewed By: Donald Melton	Reviewed Date: 01/15/2025
I reviewed the uniform hazardous waste manifests utilizing e-manifest within RCRAInfo for the last 3 years, as well as manifests HPSI kept onsite. I noted no areas of concern with the manifests.		
Record: Documentation of arrangements with response agencies		AOC: Yes
Ref #: DM7-RR-003	Reviewed By: Donald Melton	Reviewed Date: 01/15/2025
I asked Mr. Kuda if the facility has made or attempted to make arrangements with emergency services or response agencies. Mr. Kuda stated they have not. Mr. Kuda stated that the Fire Marshall conducts a walkthrough of the facility twice a year, however he said they he was not aware of any arrangements made with local emergency services, emergency response teams/contractors/equipment supplies or hospitals. Compliance assistance was given by Mr. Huff and me. NOPF 5: 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.37(a)(1) - Failure to make arrangements with police, fire department and emergency response teams to familiarize them with the layout of facility, properties of waste handled, associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility and possible evacuation routes. NOPF 6: 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.37(a)(3) - Failure to attempt to make agreements with state emergency response teams, emergency response contractors and equipment suppliers. NOPF 7: 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.37(a)(4) - Failure to attempt to make arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and types of injuries and illnesses that could result from fires, explosions or releases at the facility.		
Record: Personnel Training		AOC: No
Ref #: DM7-RR-004	Reviewed By: Donald Melton	Reviewed Date: 01/27/2025
Mr. Kuda stated that hazardous waste management training had been provided to employees that manage hazardous waste. I noted no concerns		

SECTION IV – AREA OF CONCERN

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

Building: CAA
DM7-OB-001
NOPF 1: 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.173(a) - Failure to keep a hazardous waste storage container closed during storage except when adding or removing waste. One 55-gallon hazardous waste storage container of used paint rags not closed (Photos 1-2). Corrected (closed) at the time of inspection (Photo 9).

Building: CAA**DM7-OB-001**

NOPF 2: 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d) referencing 40 CFR 265.174 - Failure to conduct weekly hazardous waste inspections.

Building: CAA**DM7-OB-001**

NOPF 3: 10 CSR 25-5.262.2(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(2) - Failure to mark the accumulation start date on hazardous waste storage containers. One 55-gallon hazardous waste storage container of used paint rags (Photos 1-2 and 9) and three 55-gallon hazardous waste storage containers of waste paint related material (Photo 3). These three containers were corrected (accurate accumulation start date) at the time of inspection (Photo 6).

Building: CAA**DM7-OB-001**

NOPFs 4a-c: 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)(A), (B), and (C) - Failure to post emergency preparedness information next to a telephone.

- a. The emergency coordinator's name and phone number - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)(A)
- b. The locations of fire extinguishers and spill control material, and if present, fire alarm - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)(B)
- c. The telephone number of fire department - 10 CSR 25- 5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)(C)

Building: Office Area**DM7-RR-003**

NOPF 5: 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.37(a)(1) - Failure to make arrangements with police, fire department and emergency response teams to familiarize them with the layout of facility, properties of waste handled, associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility and possible evacuation routes.

Building: Office Area**DM7-RR-003**

NOPF 6: 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.37(a)(3) - Failure to attempt to make agreements with state emergency response teams, emergency response contractors and

equipment supplier.

Building: Office Area

DM7-RR-003

NOPF 7: 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.37(a)(4) - Failure to attempt to make arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and types of injuries and illnesses that could result from fires, explosions or releases at the facility.

Building: CAA

DM7-OB-001

NOPF 8: 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(c)(1) - Failure to label containers storing used oil with the words "Used Oil." One 55-gallon container of used oil filters mixed with fuel filters along with hydraulic filters and one 330-gallon tote of used oil (Photos 4-5). Corrected at the time of the inspection (Photos 7-8).

SECTION V – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

I summarized the findings and recommendations with Mr. Kuda. I provided Mr. Kuda with a Confidentiality Notice which he signed as acknowledgement of receipt (Appendix 2 - Attachment 5). Mr. Kuda made no confidentiality claims. I also provided Mr. Kuda with a Receipt for Documents and Samples and NOPF, which Mr. Kuda signed as acknowledgement of receipt (Appendix 2 - Attachments 6 and 7). The following compliance assistance documents were provided to the facility at the conclusion of the CEI:

COMPLIANCE ASSISTANCE DOCUMENTS

Missouri Hazardous Waste Satellite Accumulation - PUB2215

Small business resources info

e-manifest fact sheet

MO hazardous waste generator status guidance pub2224

Follow Up

No follow-up at the time of the CEI.