



RCRA Compliance Inspection Report

Parker Hannifin

Enumclaw, WA

WAD988493573

January 18, 2023

Matthew Quarterman
RCRA Inspector
U.S. Environmental Protection Agency
Enforcement & Compliance Assurance Division
Air & Land Enforcement Branch
Land Enforcement Section
Quarterman.Matthew@EPA.gov

Supervisor Signature

Table of Contents

Section A: Basic Facility and Inspection Information

Facility Information

Inspection Information

Section B: General Facility Information

Owner/Operator Information and Site Location

Background and Activities

Section C: Regulatory Information

Regulatory Status

Site Hazardous Waste Information

Section D: Description of Inspection

Purpose of Inspection

Inspection Entry and Opening Conference

Inspection Summary

Closing Conference

Off-Site Records Review and Correspondence

Attachments

A. Picture Log

B. Document Log

Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection. The information provided does not constitute a final decision on compliance with RCRA regulations, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

Section A: Basic Facility and Inspection Information

Facility Information

Handler Name: Parker Hannifin
Handler ID Number: WAD988493573
Site Contact/Title: Charles Clark, Manufacturing Engineer Manager
Site Location Address: 225 Battersby Ave
Enumclaw, WA 98022
Site Mailing Address: 225 Battersby Ave
Enumclaw, WA 98022
Contact Phone Number: (360) 226-3523
Contact Email Address: Charles.Clark@parker.com

Inspection Information

Inspection Type: RCRA Compliance Evaluation Inspection (CEI)
Inspection Date: January 18, 2023
Arrival Time: 09:30 AM
Departure Time: 12:30 PM
Inspection Team: Matthew Quarterman, RCRA Inspector
Kyle Masters, NPDES Inspector

Section B: General Facility Information

Owner/Operator Information

According to the 2022 Dangerous Waste Annual Report (DWAR) received by the Department of Ecology (ECY) on 2/16/2023, the listed landowner and legal owner are Parker Hannifin. The site operator is also listed as Parker Hannifin, and the site contact is listed as Charles Clark, Manufacturing Engineering Manager who also certified the 2022 DWAR on behalf of Parker Hannifin.

Background and Activities

The following information was obtained from Charles Clark, and Joshua Myron, Environmental Health and Safety (EHS) Business Partner, during the opening conference of the inspection unless otherwise noted:

Parker Hannifin (Parker) purchased Helac, the previous facility owner in February 2017. This facility manufactures rotary actuators from raw materials (blocks of metal) which are used in a variety of industrial segments such as mining, agriculture, and construction. Their customer base for these rotary actuators is global. Over the past few years, the processes generating Hazardous Waste have remained constant. Mr. Clark told us he has been in his current role since January 2022. Mr. Myron said he has been in his current role as the EHS Business Partner since June 2022. Mr. Clark told me he filed the 2021 DWAR on behalf of this Parker location. After the inspection I noted the submitted 2021 DWAR was marked as received on February 23, 2022.

According to the King County Department of Assessments, the Parker building is approximately 145,000 square feet and is situated on just over 9 acres. First constructed in 1989, there have been several additions and renovations over the years. Helac first moved to this location in 1997. An expansion of the facility footprint occurred in 2016. Mr. Clark and Mr. Myron told us Parker Hannifin also leases additional adjacent land on which they have created additional employee parking and maintain a retention pond for stormwater.

Section C: Regulatory Information

Regulatory Status

According to RCRAInfo and the 2022 DWAR, Parker Hannifin is a Large Quantity Generator (LQG) of Hazardous Waste and is covered under the North American Industrial Classification System (NAICS) code of 333613, Mechanical Power Transmission Equipment Manufacturing.

During this inspection, provisions of the Resource Conservation and Recovery Act as authorized through the Dangerous Waste Regulations, as well as provisions of a National Pollutant Discharge Elimination System (NPDES) permit were evaluated. This report details only observations made regarding observations and compliance that pertain to the Dangerous Waste Regulations.

Site Hazardous Waste Information

According to the 2022 DWAR filed with the ECY on February 16, 2023, Parker Hannifin reported generating 30,974 pounds of dangerous waste coming from seven separate waste streams. The largest waste streams reported included: Painting Debris (F005) and Paint Booth filters (D035 and F005). There are two separate profiles reported for each of these waste streams. During the opening conference Mr. Clark told us Parker operates one satellite accumulation area for aerosol cans, and one central accumulation area. He also told the inspection team the facility generates used oil and universal waste lamps and batteries.

Section D: Description of Inspection

Purpose of Inspection

This was a Resource Conservation and Recovery Act (RCRA) inspection conducted pursuant to the state of Washington's federally authorized RCRA regulations found at WAC 173-303. This inspection was conducted as part of a Core Program requirement for FY 2023.

Inspection Entry and Opening Conference

The inspection was unannounced. At 9:30 AM January 18, 2023, I, Matthew Quarterman, arrived at the front entrance of Parker Hannifin at 225 Battersby Ave. The weather was cool with intermittent rain. Inspector Masters and I entered the building and attempted to contact Joshua Myron, a listed contact in ECY's Water Quality Permitting and Reporting Information System (PARIS). The front room has an electronic kiosk and guest log. The final step at the kiosk asked for a signature consenting to restrictions on information gathered during our inspection. I did not consent and inspector Masters instead called Charles Clark, the listed site contact on the 2021 DWAR. Mr. Clark answered and agreed to meet us shortly at the entrance to the facility. Inspector Masters and I showed our EPA inspector credentials to Charles Clark and Joshua Myron, who accompanied Mr. Clark. We explained our inability to sign in at their kiosk and after some discussion on the inspection process and agreement on the purpose of pictures taken during the inspection, Mr. Clark and Mr. Myron agreed to let us enter the building and conduct our multimedia inspection. As this was the first EPA inspection Mr. Clark or Mr. Myron had participated in, we first discussed inspection scope and process in a small conference room prior to conducting the site inspection.

I asked about wastes generated at the facility. Mr. Clark told us that the processes that generate

hazardous waste have not changed since the last submitted DWAR. He added that most of the hazardous wastes generated at the site are related to painting operations (Painting Debris, Paint Waste Liquid, and Paint Booth Filters). Mr. Clark and Mr. Myron both indicated that the facility was looking into switching to a water-based paint process which they hoped would reduce the amount of hazardous waste the site generates.

I mentioned reviewing copies of the most recent Dangerous Waste Compliance Inspection reports from ECY in 2017 and 2019. Both reports reference the on-site distillation of solvent and the evaporation of an oily water mixture originating from the washing of parts. Mr. Clark told us he wasn't aware that solvent distillation had ever occurred at this site and the evaporation of the oily water mixture ceased as the evaporators kept requiring repairs.

Mr. Clark mentioned that Northern Environmental was their hazardous waste vendor and that waste pickups typically occurred on Thursdays. He also told the inspection team that Northern Environmental manages used oil for the facility, and the facility does not generate any spent antifreeze. We discussed the personal protective equipment (PPE) necessary to conduct our site inspection. Steel toe boots, hearing protection, foam-lined safety glasses, and a bump caps or hard hat were required on the production floor. Inspector Masters and I went to our car to retrieve our hard hats and agreed to meet Mr. Clark and Mr. Myron in the lobby.

As we began to assemble in preparation of the site inspection, Ms. Corinna Brown, Human Resources Manager, and Mr. Matthew Brannon, Business Unit Manager introduced themselves. Prior to starting the facility tour we went back to conference room, presented our inspector credentials, and explained the scope and process related to our multimedia inspection to Ms. Brown and Mr. Brannon. We agreed to conduct a closing conference outlining any areas of concern with Mr. Clark, Mr. Myron, Ms. Brown, and Mr. Brannon once finished with the site inspection.

Inspection Summary

Mr. Clark and Mr. Myron, both accompanied the inspection team for the duration of the inspection. Mr. Brannon also joined the inspection team at various times. During the inspection we looked at the facility's processes, in addition to hazardous waste management practices, generation points, and accumulation areas. We looked for wastes that facility representatives had not yet identified or designated as hazardous. Specifically, we inspected the following areas of the Site:

- Painting Operations
- Central Accumulation Area
- Universal Waste Storage
- Electronic Waste Storage
- Exterior Paint Storage
- Exterior Covered Storage Shed

Only those areas in which we observed potential compliance concerns or noted other pertinent issues are discussed in this inspection report.

After donning hearing protection, hard hats, and foam-lined glasses, the inspection team began on the manufacturing floor. As we walked to Painting Operations, I noticed a red step can and inquired as to what the step cans were used for at the facility. Mr. Clark and Mr. Myron explained the step cans are used to collect absorbant pads that are used to line a work surface when working on parts. There were assorted types of chemical products on a nearby work surface. Mr. Myron indicated this was a typical set up for how these pads are used throughout the facility.

In Painting Operations, we were introduced to Mr. Rhett Burris. I asked Mr. Burris to walk me through the processes in the paint area. Mr. Burris explained facility personnel use prepackaged alcohol wipes to wipe metal parts off to remove anything from the rotary actuators that might affect the quality of the

painting process, such as metal fines or grease. Once the wipes are used, he told me they are put into a “satellite” for collection. I asked where this satellite was, and he pointed to an approximately 3-gallon bucket on the ground where used wipes are collected. From there he told me full satellite containers are taken to a 55-gallon drum on the other side of the paint booth where they are collected and shipped off site as hazardous waste. I explained that if the eventual management of the wipes was as a hazardous waste, that there are requirements at the point of generation for how containers of hazardous waste are managed, such as labeling and keeping containers of hazardous waste closed. I asked if I could take a picture of the container and Mr. Burris agreed (picture 1).

The inspection team then walked with Mr. Burris to the back end of the Painting Operations where paint booth filters, managed as hazardous waste, accumulate. I observed a cubic yard container with a lid that was not secure due to the amount of material in the container. I also initially did not observe any labels indicating this was hazardous waste, nor did I see any hazard indicators. We again discussed the container management requirements for containers of hazardous waste. During the discussion, I noticed that the lid, which had a thick covering of dust on it, did have a hazardous waste label along with four DOT Class 9 labels, one on each corner. I asked to take a picture of the container and a close-up of the container with the open lid, which he agreed to (pictures 2 & 3).

Next, Inspector Masters observed a spray can of black paint on a nearby bench. In a nearby municipal solid waste container, I observed tape that appeared to have black paint overspray on the side (pictures 6 & 7). I asked if a waste determination had been made on the tape prior to disposal in the municipal solid waste container. Mr. Clark said he wasn’t sure, and we agreed to discuss the observation more during the closing conference.

We then followed Mr. Burris to the other side of the two paint booths we initially saw when we entered Painting Operations area. I observed three 55-gallon containers, two were labeled as “Toxic” and one was labeled as “Hazardous Waste.” The two containers labeled as toxic both had closed hinged lids. Neither was marked hazardous waste or had an accumulation start date. Mr. Burris explained one of these containers marked toxic is the container where alcohol wipes from the 3-gallon “satellite” bucket we observed earlier are placed. The other 55-gallon container labeled “Toxic” contains plastic bags of dried paint material that comes from inside the paint booths. Mr. Clark mentioned he thought both 55-gallon containers ship off-site under the same waste profile. We discussed satellite accumulation area requirements and I asked to take a picture of both 55-gallon containers which facility representatives allowed (Picture 8). Also in the area was one 55-gallon container labeled as hazardous waste (no picture). The container was closed, and on the top of it was an aerosol puncturing device. I did not observe a hazard indicator on this container. I asked what happened to the empty cans once punctured, and Mr. Clark told me they recycle them as scrap metal.

Once a painter in one of the paint booths was finished, Mr. Burris led me inside where I saw three approximately 3-gallon containers with what appeared to be dried paint in them. He explained that as the painters work, a mixture of solvent and spent paint is generated. The painters leave the buckets of the mixture in the paint booth to evaporate prior to putting them in one of the 55-gallon containers observed outside the paint booth. I asked to take pictures of the three containers and Mr. Burris agreed (Pictures 9, 10, and 11). We discussed how the description of this activity sounds like potential treatment of a hazardous waste and agreed to discuss more during the closing conference.

Outside of the paint booth, Mr. Burris pointed to another “satellite” container that is used to collect used alcohol wipes. Like the container observed on the other side of the paint booths, Mr. Burris told me the contents of this container are emptied into one of the two black 55-gallon containers labeled as “Toxic.” Once full, the 55-containers are moved to the central accumulation for eventual off-site disposal as hazardous waste. I explained that if these wipes were being managed as hazardous waste, they should be managed as hazardous waste from the point of generation which means the 3-

gallon container likely should be labeled as hazardous waste, a hazard indicator, and should remain closed unless actively in use. Mr. Burris agreed to let me take a picture of this container (picture 12).

The inspectors and site representatives, then made our way to the central accumulation area. We observed three 55-gallon containers situated on spill pallets. Mr. Clark explained that one of these containers held used oil, one held oily absorbents, and one contained thick greases and other oil-based lubricant. All three containers were closed. I observed an accumulation of a dark oily substance in the secondary containment. I asked Mr. Clark about the accumulation of dark liquid in the secondary containment. He told me he thought it was used oil due to the container of used oil on the spill pallet. I asked him if he knew how long the oil had been in the pallet and he said he wasn't sure. I asked to take a picture of the used oil in the spill pallet and Mr. Clark agreed (picture 13). We also discussed the 55-gallon drum that contained thick greases and other oils. I asked if Mr. Clark knew how the contents of the container were managed. He said he wasn't sure; he knew it wasn't hazardous waste and thought it might be used oil but would need to check. We agreed to look at a profile after the site inspection. I mentioned that if it was managed as used oil, that the container would need a used oil label which was not on the container at the time of inspection.

The inspection team then moved to the central accumulation area. We observed 13 55-gallon drums in this area with the following labels:

- 3 "Haz Waste Paint Line"
- 1 "Absorb Non Haz"
- 2 "Absorbents Non Haz"
- 1 "Sludge Non-Haz"
- 1 "Haz Paint Waste"
- 1 "Haz Waste Paint Line"
- 1 "Non-Haz Absorbents"
- 1 "Non-Haz Absorb"
- 1 "Paint Line Haz Waste"
- 1 "Haz Paint Line"

All containers with an indication of "haz" or "hazardous" each had a hazardous waste label attached to the lid, along with an accumulation start date. The range of accumulation start dates observed on the containers of hazardous waste was from 12/13/2022 to 1/7/2023. I asked to take overview pictures of this area, and Mr. Clark agreed (pictures 14 and 15). We discussed how all the observed containers of hazardous waste had hazardous waste labels and accumulation start dates and were closed. Missing from each of the containers were hazard indicators. Also in this area, I observed two white bags that Mr. Clark told me was non-hazardous abrasive blast media which are disposed of through the municipal solid waste.

I asked if there were any containers of paint booth filters in the central accumulation area. Mr. Clark led me to two cubic yard containers. Both containers were closed and had accumulation start dates on the top. I did not observe hazardous waste or hazard indicators on either container. I asked to take a picture of these cubic yard containers and Mr. Clark agreed (picture 16). Behind the 55-gallon containers, I observed several filters actively draining a dark oily liquid into a grate with a tray. The tray was labeled as "used oil."

We discussed what would happen in the event of a spill in the central accumulation area. As none of the containers of hazardous waste were on secondary containment, we asked if there was a natural slope on the floor in this area to prevent any potential spill of hazardous waste from leaving the building. Mr. Clark wasn't sure but thought there was a slight slope to the floor, which appeared to slope away from the nearest exit approximately 30 feet from these containers.

Also in this area was universal waste storage. During the opening conference, Mr. Clark indicated they generate lamps and batteries, both which they manage as universal waste. I observed the following containers in this area holding lamps and batteries managed as universal waste:

One container with 16 lamps, 9 silver-tip, and 7 green-tip inside. The container was labeled as universal waste lamps and was not closed (picture 17).

One container of lead acid batteries. It was thought that these were managed under an exclusion for lead acid batteries, and not as universal waste (picture 17).

One container with approximately 65 lamps inside, at least three of which were silver-tip and the remaining green-tip. The container was labeled as universal waste lamps and was not closed (picture 18).

One container labeled as "universal waste used sodium light bulb out side lamps." The accumulation start date was listed as "12-01-2020." A number of silver-tip lamps were sticking out from the top of the container that was not closed (pictures 19 and 20).

One small cardboard box labeled as used batteries. The box appeared to be all alkaline batteries and was not closed (picture 19).

Another plastic container of what looked to be alkaline batteries. The container was labeled "used batteries" and was closed (picture 19).

Additionally, on the countertop I observed a number of different batteries including, alkaline, lithium, and lead-acid (picture 19).

I also saw florescent lamp ballasts on the counter (picture 19 and 21). Mr. Clark and I discussed management options, and I agreed to follow-up after the inspection. Mr. Clark thought that since the building was built in 1989, It wasn't likely the ballasts would contain PCB's. Prior to leaving this area, we discussed the requirements for universal waste management of lamps and batteries.

On our way out to walking the exterior of building and inspecting the paint product lockers and National Pollution Discharge Elimination System (NPDES) permit provisions, Mr. Clark took me to the second floor where a cubic yard tote of electronic waste was accumulation. He said once full, they take it to a nearby electronics recycler. We concluded the interior facility tour at approximately 11:00 a.m.

Exterior Paint Storage

During the exterior site inspection, In the parking lot, we observed two sheds that facility representatives told us contained paint product. One of the sheds was opened and inside appeared to be containers of paint products.

Also in this area were several larger metal containers of various sizes that Mr. Clark explained contained scrap metal of different types that are sent for recycling. I also observed a couple of trailers that Mr. Clark said store raw metal product that rotary actuators manufactured here are machined from.

Exterior Covered Storage Shed

While walking the perimeter of the building with the inspection team evaluating NPDES permit requirements, I observed a covered three-sided shed that, according to previous ECY Dangerous Waste Compliance inspection reports, was where solvent distillation occurred. In 2019, on-site solvent distillation had ceased, but the distillation apparatus and a 55-gallon satellite accumulation area

remained here. The partially dried bags of leftover paint from the paint booths were accumulated in this satellite accumulation area. Today during the inspection, we only saw one 55-gallon drum that Mr. Clark said was product abrasive blast media for a process they no longer perform, and which Parker was looking to sell. The balance of the time walking the exterior was spent evaluating NPDES permit provisions, which concluded at approximately 12:00 p.m.

Closing Conference

Mr. Clark, Mr. Myron, and Mr. Brannon, who joined the inspection team for the exterior site inspection, contacted Ms. Brown to let her know we were ready to hold a closing conference.

A few times during the inspection I communicated to facility staff I would identify facility records to be sent for review off-site after the inspection. However, I requested to see documentation of weekly Central Accumulation Area inspections on-site. In my preparation for this inspection, I noted documentation of weekly central accumulation area inspections were not available during the last Dangerous Waste Compliance Inspection conducted by ECY on August 7, 2019. Mr. Clark said they did not have records of weekly central accumulation areas inspections. I then briefly went over the other types of records they could expect to see requested by e-mail after this inspection.

The inspection team then summarized the inspection findings. With regards to Washington's RCRA-authorized Dangerous Waste Regulations, I identified the following areas of concern encountered during the inspection:

In the painting operations area and the central accumulation area, I observed the requirements for hazardous waste container management not being met.

In the painting operations area, we saw several examples where containers of hazardous waste appeared to be managed as satellite accumulation areas that didn't meet satellite accumulation area requirements.

We discussed the paint overspray from a spray can of paint on the masking tape found in the municipal solid waste container.

Also in the painting operations area, we were told of the practice of allowing containers of dirty solvent and paint in paint booths to evaporate prior to the eventual management of the dried paint as hazardous waste.

We discussed the accumulation of used oil in the secondary containment for the 55-gallon container of used oil and used oil labeling requirements should they apply to the 55-gallon oily grease container.

We talked about the containers of universal waste lamps and batteries observed during the inspection. None appeared to fully meet the universal waste container management requirements.

I reiterated I would look into the management of non-PCB containing ballasts and communicate what I find. I explained the process of drafting an inspection report and what follow-up from an inspection report could look like. I confirmed that Mr. Clark and Mr. Myron were points of contact for inspection follow-up and told them they could expect an e-mail outlining the requested records sometime tomorrow, January 19, 2023.

Inspector Masters then detailed observed areas of concern as they related to NPDES permit provisions and follow-up before we thanked Ms. Brown, Mr. Brannon, Mr. Clark, and Mr. Myron for their time and departed the facility at approximately 12:30 p.m.

Off-site Records Review and Correspondence

After the inspection, I reviewed hazardous waste manifests in RCRAInfo attributed to WAD988493573 between 08/08/2019 and 01/18/2023. 116 manifests are listed as attributed to the RCRA number assigned to Parker Hannifin. Of those 116 manifests, 7 are listed in RCRAInfo as “corrected.” Those manifest numbers are:

- 019896238JJK
- 019896234JJK
- 019896205JJK
- 018725682JJK
- 018725679JJK
- 018725675JJK
- 018725674JJK

I did not observe any manifests with times in transit that required submission of manifest exception reports per the instructions found at WAC 173-303-220(2).

After the inspection, I also reviewed the submitted DWAR's to ECY for 2021 and 2022. The following areas of concern were identified:

2021 DWAR

Manifest 019896426JJK is reported as documenting transport of 291 pounds of hazardous waste Painting Debris with a F005 waste code. Upon review, this manifest lists a different generator and documents shipment of 1500 pounds of Hazardous Waste with D006 and D007 waste codes.

Manifest 018725600JJK is reported as documenting transport of 681 pounds of hazardous waste Painting Debris with a F005 waste code. Upon review, this manifest documents 91 pounds of aerosol cans with D001 and D039 waste codes.

Manifest 018725631JJK is reported as documenting transport of 263 pounds of hazardous waste Painting Debris with a F005 waste code. Upon review, this manifest documents 90 pounds of aerosol cans with D001 and D039 waste codes.

Manifest 018725631JJK is reported as documenting transport of 458 pounds of hazardous waste Paint Waste Liquid with D001, F003, D035, and F005 waste codes. Upon review, this manifest documents 90 pounds of aerosol cans with D001 and D039 waste codes.

Manifest 019896426JJK is reported as documenting transport of 100 pounds of hazardous waste Weld-Anti-Spatter Aerosol Cans with D039 and D001 waste codes. Upon review, this manifest lists a different generator and documents shipment of 1500 pounds of Hazardous Waste with D006 and D007 waste codes.

Manifest 018725644JJK is reported as documenting transport of 102 pounds of hazardous waste Weld-Anti-Spatter Aerosol Cans with D039 and D001 waste codes. Upon review, this manifest documents 751 pounds of hazardous waste paint booth filters with D035 and F005 waste codes and 748 pounds of hazardous waste painting debris with F005 waste codes.

Manifest 019896426JJK is reported as documenting transport of 549 pounds of hazardous waste Paint Booth Filters with D035 and F005 waste codes. Upon review, this manifest lists a

different generator and documents shipment of 1500 pounds of Hazardous Waste with D006 and D007 waste codes.

Manifest 018725600JJK is reported as documenting transport of 585 pounds of hazardous waste Paint Booth Filters with D035 and F005 waste codes. Upon review, this manifest documents 91 pounds of aerosol cans with D001 and D039 waste codes.

2022 DWAR

Manifest 018725731JJK is reported as documenting transport of 589 pounds of hazardous waste paint booth filters with F005 and D035 waste codes. Upon review, this manifest documents the shipment of 589 pounds of painting debris with a F005 waste code and 1117 pounds of hazardous waste Paint Booth Filters with a D035 and F005 waste codes.

Manifest 018725725JJK is reported as documenting transport of 679 pounds of hazardous waste painting debris with a F005 waste code. Upon review, this manifest documents the shipment of 339 pounds of painting debris with a F005 waste code and 697 pounds of hazardous waste Paint Booth Filters with D035 and F005 waste codes.

On January 19, 2023, I sent Mr. Clark and Mr. Myron a records request for items related to regulatory requirements of an LQG. I requested the following records be sent to me by the close of business on January 24, 2023. This e-mail is included as document 1 in the Document Log.

- a. Training Plan as described in WAC 173-303-200(9)
- b. Contingency Plan as described in WAC 173-303-201
- c. Manifest Exception Reports, if applicable as described in WAC 173-303-220(2)
- d. General Facility Inspections as described in WAC 173-303-200(10)(a)-(c)

I also asked for an estimation for the last time weekly central accumulation area inspections were last conducted, any updates on masking tape with paint overspray in the municipal solid waste, and a current waste profile for the two 55-gallon containers managed as satellites outside the paint booth. During the inspection, Mr. Clark said he thought they shipped off-site under the same waste profile.

On January 24, 2023, I received an e-mail from Mr. Myron. In it, he wrote, "we are working on putting together the document package for you and will have send it over as soon as we can. Please let me know if you have any questions."

On February 24, 2023, I sent an e-mail to Mr. Clark and Mr. Myron requesting additional documents to review. This e-mail is included as document 2 in the Document Log. They included:

Most recent shipping paper (manifest, bill of lading) showing the last time universal waste lamps and batteries were shipped off-site, or some other demonstration universal waste accumulation time limits are met per WAC 173-303-573(11).

A profile or waste characterization for the 55-gallon container on the spill pallet in the Central Accumulation Area for the grease. It was unclear during the inspection if this was managed as used oil or in some other way.

Training records as they pertain to hazardous/dangerous/universal waste management for the following individuals: Charles Clark, Joshua Myron, Rhett Burris, Ace Sanders, Micheal Burgess, and William Pettyjohn.

Most recent Uniform Hazardous Waste Manifest documenting shipment of hazardous waste from your site from off-site management. During the inspection I observed seven 55-gallon containers of hazardous waste along with two cubic yard containers in the central accumulation area.

I requested these documents, along with the previously requested records by COB March 1, 2023. On March 1, 2023, I received an e-mail from Mr. Clark with the following attachments:

EPA RCRA Response.docx

Attachment 1 – Environmental Training.pdf

Attachment 2 – SPCC Contingency Plan.pdf

Attachment 3 – General Facility Inspections.pdf

Attachment 4 – Universal Waste Manifest.pdf

Attachment 5 – Uniform Hazardous Waste Manifest.pdf

The e-mail from Mr. Clark is included as document 3 in the Document Log.

ATTACHMENT A

Parker Hannifin Picture Log

All pictures were taken by Matt Quarterman during the inspection on January 18, 2023, using an Olympus Tough TG-6 digital camera. All pictures are listed below. None of the pictures have been manipulated in any way.

Picture 1 – P1180001 – Container referred to as a “satellite” during the inspection. Used alcohol wipes are taken to a 55-gallon satellite container the inspection team was told was managed as hazardous waste.

Picture 2 – P1180002 – Cubic yard container of used paint booth filters managed as hazardous waste.

Picture 3 – P1180003 – Close up of the lid on the cubic yard container seen in the previous picture, P1180002.

Picture 4 – P1180004 – Label on Aerosol can of paint.

Picture 5 – P1180005 – View of the municipal trash receptacle next to the can of spray paint. Tape with black paint overspray is in receptacle.

Picture 6 – P1180006 – Close up of contents in the municipal trash receptacle observed in the previous picture, P1180005.

Picture 7 – P1180007 – Two 55-gallon containers each managed as hazardous waste satellite accumulation areas. One contains the used alcohol wipes observed in pictures P1180001 and P1180011, and the other contains the dried-out containers of paint observed in pictures P1180008, P1180009, and P1180010.

Picture 8 – P1180008 – One approximately 5-gallon container of paint in the painting booth. Once fully dry, facility representatives told us these containers are placed in one of the 55-gallon drums seen in picture P1180007.

Picture 9 – P1180009 – Two approximately 5-gallon container of paint in the painting booth. Once fully dry, facility representatives told us these containers are placed in one of the 55-gallon drums seen in picture P1180007.

Picture 10 – P1180010 – Duplicate of the previous picture, P1180009.

Picture 11 – P1180011 – Container of alcohol wipes referred to as a “satellite” by facility personnel during the inspection. Container is emptied into one of the 55-gallon containers in picture P1180007 and managed off site as hazardous waste.

Picture 12 – P1180012 – Secondary containment with liquid identified as used oil in it.

Picture 13 – P1180013 – Overview of part of the Hazardous Waste Central Accumulation Area. Two 55-gallon containers labeled as hazardous waste. The hazardous waste container on the left has an accumulation start date of 12/13/2022 and the hazardous waste container on the right has an accumulation start date of 12/15/2022. Also seen are four 55-gallon containers of non-hazardous absorbant.

Picture 14 – P1180014 – Another overview of the Hazardous Waste Central Accumulation Area. Five 55-gallon containers labeled as Hazardous Waste each with accumulation start dates. Also seen are three 55-gallon containers of non-hazardous absorbant.

Picture 15 – P1180015 – Two cubic yard containers of paint booth filters managed as hazardous waste. Both containers had accumulation start dates.

Picture 16 – P1180016 – Container of lamps managed as universal waste. Container was labeled as universal waste lamps and was open at the time of inspection.

Picture 17 – P1180017 – Container of lamps managed as universal waste. Container was labeled as universal waste lamps and was open at the time of inspection.

Picture 18 – P1180018 – Overview picture of assorted batteries and containers of lamps managed as universal waste. The container with the purple universal waste label has an accumulation start date written as 12/01/2020.

Picture 19 – P1180019 – Close-up picture of the purple universal waste label seen in the previous picture, P1190018. The contents are listed as, “used sodium light bulb out side lamps.”

Picture 20 – P1180020 – Overview picture of florescent lamp ballasts.



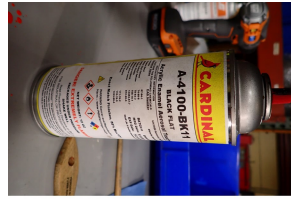
P1180001.JPG



P1180002.JPG



P1180003.JPG



P1180004.JPG



P1180005.JPG



P1180006.JPG



P1180007.JPG



P1180008.JPG



P1180009.JPG



P1180010.JPG



P1180011.JPG



P1180012.JPG



P1180013.JPG



P1180014.JPG



P1180015.JPG



P1180016.JPG



P1180017.JPG



P1180018.JPG



P1180019.JPG



P1180020.JPG

ATTACHMENT B

Parker Hannifin Document Log

The following documents are referenced in the inspection report:

1. January 29, 2023 electronic mail records request to Mr. Clark and Mr. Myron for items related to regulatory requirements of an LQG.
2. February 24, 2023 electronic mail records request to Mr. Clark and Mr. Myron for additional documents to review.
3. March 1, 2023 electronic mail from Mr. Clark in response to the two records requests.

The following attachments were included:

EPA RCRA Response.docx

Attachment 1 – Environmental Training.pdf

Attachment 2 – SPCC Contingency Plan.pdf

Attachment 3 – General Facility Inspections.pdf

Attachment 4 – Universal Waste Manifest.pdf

Attachment 5 – Uniform Hazardous Waste Manifest.pdf