

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

KAWASAKI MOTORS MANUFACTURING USA

6600 NW 27th Street
Lincoln, NE 68524
402-476-6600

EPA ID Number: NED068652981

On

May 21-22, 2024

By

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region 7

Enforcement and Compliance Assurance Division

1.0 INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division (ECAD), I conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Kawasaki Motors Manufacturing, located in Lincoln, Nebraska, on May 21-22, 2024. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. During the inspection, I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. This inspection report and attachments present the results of the CEI.

2.0 PARTICIPANTS

Kawasaki Motors Manufacturing:

- Ryan Long, Engineering Assistant Manager (21 years with company)
- Brandon Crom, Plant Engineer (3 years with company)
- Abby Kessler, Environmental Analyst (2 months with company)
- Todd Hoebelheinrich, Assistant Manager Facilities Engineer- Rail Car (19 years with company)

EPA:

- Mark Holcomb, Civil Investigator/Inspector (SEE)
- Edwin Buckner, Environmental Engineer
- Mark Henning, Environmental Specialist - Nebraska Department of Environment and Energy

3.0 INSPECTION PROCEDURES

On May 21, 2024, we arrived unannounced at the facility's main entrance at about 0900 hours. Initially, we conducted a visual reconnaissance of the facility searching for areas of concern observable from the adjacent public roadways and parking lots. I identified no environmental issues or concerns during this preliminary examination. I entered the facility through the main entrance, and contacted Mr. Ryan Long (Engineering Assistant Manager), from the front desk phone. I introduced myself and my colleagues to Mr. Long. Mr. Long escorted us to a conference room. There we met Mr. Brandon Crom (Plant Engineer), Mr. Todd Hoebelheinrich (Assistant Manager Facilities Engineer), and Ms. Abby Kessler (Environmental Analyst) with Kawasaki. Mr. Long stated that he was the primary contact for hazardous waste at this facility. He also told us that the items of personal protective equipment required for our visual inspection at this facility were protective boots, eye protection, hearing protection, and a helmet in some areas.

At the opening conference, I presented my EPA ID and credentials to Mr. Long. I explained that my colleagues, Edwin Buckner (EPA RCRA Inspector/Case Officer), and Mark Henning (Environmental Specialist - Nebraska Department of Environment and Energy), would be assisting me. I next explained the purpose and procedures of the inspection. I then presented Mr. Long with a copy of RCRA Section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented them with a copy of Title 18 U.S. Code, Sections 1001 and 1002. They were made aware of their confidentiality rights, and I informed them that a Confidentiality Notice would be provided at the end of the inspection to make a confidentiality claim if they so desired. Messrs. Long, Crom, Hoebelheinrich, and Ms. Kessler acted as the official facility representatives during the opening conference and visual inspection phase (both days), and during the afternoon exit conference phase on Day 2 of the inspection.

The CEI consisted of a discussion of facility operations, waste generation, and waste management; a visual inspection of active waste generation and management areas; and a review of waste management records and documents. We conducted a visual inspection of the following areas:

- Parts Storage
- Building 1, Wet Paint
- Building 1, Wet Sanding
- Building 1, Outside Welding Line
- Building 9, Assembly Line
- Building 9, Oil Room
- Building 9, Graphics Area
- Building 9, Aerospace
- Building 8, E-Coat
- Building 2, Wheel E-Coat
- Building 1, Maintenance
- Building 1, Maintenance Dock
- Paint Mix Room / Inside 90-Day Flammable Storage Room CAA
- Outside 90-Day Storage CAA
- Rail Car B16
- Rail Car C31

- Rail Car Paint Booth
- Rail Car Crib
- Rail Car E5
- Building 3 Recycling Room

See Attachment #1 for the aerial/map views and facility diagrams. Document photocopies and photographs were collected as inspection documentation (see Attachments #1-13 and Photos 1-61). The photo log is included as Attachment #2. Information collected during the inspection is documented on an Entry/Exit checklist, the hazardous waste compliance checklist, and in a notebook. I reviewed documents including the following: Safety Data Sheets (SDS), manifests, invoices, eManifest report, biennial report, waste stream reports, contingency plan, staff training documents, inspection checklists, and waste profiles. I followed the inspection procedures detailed in the RCRA CEI Standard Operating Procedure 2321.01E unless noted otherwise.

At the conclusion of the inspection, I summarized my findings and recommendations with Messrs. Long, Crom, and Hoebelheinrich and Ms. Kessler. I provided Mr. Long with a Receipt for Documents (see Attachment #3), a Confidentiality Notice (see Attachment #4), and a Notice of Preliminary Findings (NOPF) (see Attachment #6), which he signed as acknowledgment of receipt. No claim of confidential business information was made by Mr. Long. I provided inspection and compliance assistance documents to Mr. Long, which included the following:

- *RCRA Section 3007(a) (EPA Handout)*
- *Title 18 U.S. Code, Sections 1001 and 1002 (EPA Handout)*
- *Confidentiality Notice (Top page of the completed carbonless transfer set)*
- *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA In Connection with Inspections (EPA Handout)*
- *Receipt for Documents and Samples (Top page of the completed carbonless transfer set)*
- *NOPF with Instructions for Responding on the back of the form (top page of the completed carbonless transfer set)*
- *Instructions for Responding to a NOPF (EPA Handout)*
- *RCRA Organic Air Emission Standards for TSDFs and Generators" and "Leak Detection and Repair a Best Practices Guide (EPA Handout)*

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

Kawasaki Motors Manufacturing is a large manufacturer with three primary divisions: 1) Consumer Products, which produces recreation utility vehicles such as four-wheel all-terrain vehicles; 2) Rail Car, which manufactures passenger Rail Cars such as those used in the New York Subway and similar systems; and 3) Aerospace, which manufactures doors and parts assemblies used in passenger aircraft manufacturing. The facility was built in 1973 and includes over two million square feet (1.2 million for the Consumer Products Division and 0.8 million for the Rail Car Division) on about 330 acres. The plant has about 2800 employees working three shifts M-F. They produce about 68,000 units of consumer products per year and about 50 Rail Cars per year. The facility previously manufactured Kawasaki Jet Skis, but this line was

recently transferred to another plant. The facility is privately owned by Kawasaki Motors Manufacturing Corporation USA.

4.2 RCRA Status

Kawasaki Motors Manufacturing had been previously inspected by the EPA for RCRA compliance on August 27-28, 2014, and on January 8-10, 2020, by the Nebraska Department of Environment and Energy. According to RCRAInfo, Kawasaki Motors Manufacturing had most recently notified as a large quantity generator on February 15, 2022. I verified the facility address and the site contact information with Mr. Long and updated the EPA RCRA Notification Acknowledgement Verification Report (see Attachment #5) to indicate the primary contact's updated title. Based on the review of the past three years' uniform hazardous waste manifests, I determined that Kawasaki Motors Manufacturing routinely generates D001, D002, D005, D007, D009, D018, D035, D040, F001, F003, and F005 hazardous waste at the large quantity generator (LQG) level and inspected the facility as a LQG. I also inspected the facility as a small quantity handler of universal waste batteries and a generator of used oil.

4.3 Facility Waste Streams and Management

Mr. Long stated that the following waste streams are managed by Kawasaki Motors Manufacturing:

Overview of Waste Generated – Based on a Waste Spreadsheet for 2023, Kawasaki Motors Manufacturing generated about 30 different waste streams consistently, as well as 12 waste streams they described as “on occasion” or “one-time shipments” for the three different divisions. This was a mixture of hazardous and non-hazardous waste. See Attachments #7 and #8 for additional waste profiles and reports. We reviewed all 75 manifests for the previous three-year period and observed that four were missing TSDF signatures (022989292, 022989191, 023912826, 023454228) but those all had the signatures available online. See Attachment #9 for sample manifests from September 11, 2024, and September 20, 2024. The e-Manifest report shows that Kawasaki Motors Manufacturing generates shipments about every two to three months. The total quantity of hazardous waste shipped in 2023 by Tradebe Environmental Services is listed below. Note, that this does not include non-hazardous or non-RCRA hazardous materials.

- September 20, 2023, 13,897 pounds
- July 14, 2023, 16,700 pounds
- June 7, 2023, 29,390 pounds
- March 14, 2023, 14,711 pounds
- February 14, 2023, 6,625 pounds

This totalled 81,323 pounds for 2023. The average amount of hazardous waste generated per month was estimated at about 6,777 pounds per month.

The 2021 Comprehensive Biennial Report (the 2023 Biennial Report was completed but had not been released yet) showed the following hazardous Wastes and the total quantity shipped annually for 2021:

Spent Rail Car (RC) Hemipleat Filters - Kawasaki Motors Manufacturing generates spent Rail Car (RC) Filters during the Rail Car manufacturing process. This waste has been determined to be D007 (chromium) based on process and product knowledge. The annual quantity generated is estimated at 450 pounds. Onsite the waste is stored in 55-gallon drums in the CAA. Transport is by Tradebe Transportation to Tradebe Treatment and Recycling LLC (Indiana) for H141 processing (storage, bulking).

Ozzy Juice Filters - Kawasaki Motors Manufacturing generates spent Ozzy Juice Filters during maintenance operations. This waste has been determined to be D040 based on process and product knowledge. The Ozzy Juice itself is an aqueous-based degreasing solution that is pH-neutral, non-irritating, and non-flammable. The annual quantity generated is estimated at about 200 pounds. Onsite the waste is stored in 55-gallon drums in the CAA. Transport is by Tradebe Transportation to Tradebe Treatment and Recycling LLC (Indiana) for H141 processing (storage, bulking).

Used Refrigerant Oil - Kawasaki Motors Manufacturing generates spent Refrigerant Oil during maintenance operations. This waste has been determined to be D001 based on process and product knowledge. The annual quantity generated is estimated at about 180 pounds. Onsite the waste is stored in 55-gallon drums in the CAA. Transport is by Tradebe Transportation to Tradebe Treatment and Recycling LLC (Indiana) for H161 processing (fuel blending).

Used Oil - Kawasaki Motors Manufacturing generates about 800 gallons per year of used oil from the equipment maintenance operations (see Photo 4). This waste had been determined to be non-hazardous based on product and process knowledge and is managed as used oil. During the visual inspection in Building 1, Maintenance Shop area, I observed a steel 500-gallon above-ground storage tank labeled as “Used Oil”, about ½ full, that appeared to be in good condition with no obvious damage or leaks. (see Photo 30). Mr. Long stated that used oil filters are punctured and hot drained, and the oil goes into this tank, and the used filter goes into scrap metal. Crystal Clean processes the used oil and transports it to Crystal Clean (Hoffman Estates, Illinois). See Attachment #10, page 2 for invoice.

RC Plasma Cutter & Finishing Waste - Kawasaki Motors Manufacturing generates spent RC Plasma Cutter & Finishing Waste during Rail Car manufacturing operations (see Photos 54-60). This waste has been determined to be D001, D007, D035, and F005 based on process and product knowledge. The annual quantity generated is estimated at about 1,750 pounds. Onsite the waste is stored in 55-gallon drums in the CAA. Transport is by Tradebe Transportation to Tradebe Treatment and Recycling LLC (Indiana) for H141 processing (storage, bulking). Non-stainless steel has been determined to be non-hazardous and is processed as scrap metal.

Aerosol Can Waste - Kawasaki Motors Manufacturing generates spent Aerosol Can Waste during crushing of spent and partially spent aerosol cans (see Photos 12, 13, 19, 20). This waste has been determined to be D001, D018, D035, F001) based on process and product knowledge.

The annual quantity generated is estimated at about 250 pounds. During the visual inspection in Building 9, Oil Room, the aerosol can puncturing press unit with the can collection drum (about $\frac{3}{4}$ full), and waste paint collection drum (about $\frac{1}{2}$ full) were observed. The labels on the satellite accumulation area (SAA) 55-gallon drum were covered with paint and difficult to read (see Photo 13). The drum was in good condition with no obvious damage or leaks. The lid was closed. There were several SAA containers located throughout the facility for accumulating cans prior to crushing (see Photos 19, 20). These drums are labeled as Hazardous Waste. Onsite the waste from the partially full aerosol cans is stored in the CAA. It is transport is by Tradebe Transportation to Tradebe Treatment and Recycling LLC (Indiana) for H161 processing (fuel blending). The empty crushed cans are treated as scrap metal.

Crushed Fluorescent Lamps - Kawasaki Motors Manufacturing generates Crushed Fluorescent lamp waste during facility maintenance operations from changing out older facility fluorescent lamps to more efficient LEDs. This waste has been determined to be D009 (mercury) based on process and product knowledge. It is not treated as universal waste since the lamps are crushed. The annual quantity generated is estimated at about 2,700 pounds. Onsite the waste is stored in the SAA 55-gallon drum attached to the lamp crusher and then transported to the CAA when full. During the visual inspection, I observed that the lamp crusher tube used to insert the fluorescent lamps was open with no plug or cap. Overnight, before the visual inspection on Day 2, the Engineering Department was able to construct a new plug and close the lamp crusher (preventing venting into the room atmosphere). I took another picture of the repaired Lamp Crusher (see Photos 23 and 43). This NOPF was resolved at the time of the inspection. Transport is by Tradebe Transportation to Tradebe Treatment and Recycling LLC (Indiana) for H141 processing (storage, bulking).

- **NOPF 6: Failure to keep satellite accumulation area (SAA) containers closed as required in 128 10-005.01 Ref 10-004.01A2 [40 CFR 262.15(a)(4)]:**
 - a) **Lamp Crusher located in Maintenance**

Graphics Media Sludge - Kawasaki Motors Manufacturing generates spent Graphics Media Sludge Waste during production operations. This waste has been determined to be F003 and F005 based on process and product knowledge. The annual quantity generated is estimated at about 1,160 pounds. Onsite the waste is stored in 55-gallon SAA and CAA drums. Transport is by Tradebe Transportation to Tradebe Treatment and Recycling LLC (Indiana) for H020 processing (solvent recovery). During the visual inspection in Building 9, Graphics Area Dip Tank #2– I observed a damaged graphic application soaked in a chemical bath solution (xylol – also known as xylene or dimethyl benzene, a solvent) placed inside of an open one-gallon plastic bucket before manually carrying it about ten feet to the nearest SAA container – the process appears to be a SAA to SAA container transfer, and the small 1/10 full bucket container was labeled “hazardous waste”, but not closed (see Photos 14 and 15).

- **NOPF 6: Failure to keep satellite accumulation area (SAA) containers closed as required in 128 10-005.01 Ref 10-004.01A2 [40 CFR 262.15(a)(4)]:**
 - c) **One-gallon bucket in Graphics Dip Tank 2**

Oakite STC Parts Washer Solution - Kawasaki Motors Manufacturing generates spent Oakite STC Parts Washer Solution Waste during maintenance operations. This waste has been determined to be D002 based on process and product knowledge. The annual quantity generated is estimated at about 4,450 pounds. Onsite the waste is stored in 55-gallon drums in the CAA. Transport is by Tradebe Transportation to Tradebe Treatment and Recycling LLC (Indiana) for H141 processing (storage, bulking). During the inspection, the only parts washers I observed were using the “Crystal Clean 142” mineral spirits solution with a flash point of 142 degrees F (per SDS) and maintained by Crystal Clean and is not typically considered hazardous. See Attachments #10 and #11 for the invoice and SDS for the Chrystal Clean solution.

Still Bottoms - Kawasaki Motors Manufacturing generates spent Still Bottoms Waste during the distillation of spent waste solvent in the still (see Photos 39-41). This waste has been determined to be D001, D035, F003, and F005) based on process and product knowledge. The annual quantity generated is estimated at about 20,700 pounds. During the visual inspection in the Paint Mix Room/ Inside 90-Day CAA I observed the still used to distill solvent for reuse. The still bottoms were collected in the black drum (on the left in Photo 39 and in Photo 40). The drum was labeled with hazardous waste labels. Onsite the waste is stored in the CAA. Transport is by Tradebe Transportation to Tradebe Treatment and Recycling LLC (Indiana) for H161 processing (fuel blending). See the CAA section below for additional discussion regarding the still operation.

Finishing Wiping Down Tissues - Kawasaki Motors Manufacturing generates spent Finishing Wiping Down Tissues Waste during the manufacturing process. This waste has been determined to be D001, D035, and F005) based on process and product knowledge. The annual quantity generated is estimated at about 915 pounds. Onsite the waste is stored in the CAA. Transport is by Tradebe Transportation to Tradebe Treatment and Recycling LLC (Indiana) for H020 processing (solvent recovery).

Waste Solvent - Kawasaki Motors Manufacturing generates spent Waste Solvent during the manufacturing process. This waste has been determined to be D001, D035, F003, and F005 based on process and product knowledge. The annual quantity generated is estimated at about 32,500 pounds. Onsite the waste is stored in the CAA (see Photos 46-53). Transport is by Tradebe Transportation to Tradebe Treatment and Recycling LLC (Indiana) for H061 processing (fuel blending).

Paint Mix Room Waste - Kawasaki Motors Manufacturing generates spent Paint Mix Room Waste during the manufacturing process. This waste has been determined to be D001 based on process and product knowledge. The annual quantity generated is estimated at about 18,500 pounds. Onsite the waste is stored in the CAA (see Photos 32-42). Transport is by Tradebe Transportation to Tradebe Treatment and Recycling LLC (Indiana) for H020 processing (solvent recovery). During the visual inspection, we observed three open buckets (also called day cans) of spent paint and solvent inside the paint booth in the Color Clear Line in Building 1 Wet Paint area (see Photos 3-7).

- **NOPF 6: Failure to keep satellite accumulation area (SAA) containers closed as required in 128 10-005.01 Ref 10-004.01A2 [40 CFR 262.15(a)(4)]:**
a) **Three buckets in the Color Clear Line Building 1**

Nitric Acid Waste - Kawasaki Motors Manufacturing generates spent Nitric Acid Waste during the manufacturing process. This waste has been determined to be D002 based on process and product knowledge. The annual quantity generated is estimated at about 400 pounds. Onsite the waste is stored in the CAA. Transport is by Tradebe Transportation to Tradebe Treatment and Recycling LLC (Indiana) for H141 processing (storage bulking).

Blackline Paint Overspray - Kawasaki Motors Manufacturing generates spent Blackline Paint Overspray Waste during the manufacturing/painting process. This waste has been determined to be D001, D005, and F003 based on process and product knowledge. The annual quantity generated is estimated at about 1,250 pounds. Onsite the waste is stored in the CAA. Transport is by Tradebe Transportation to Tradebe Treatment and Recycling LLC (Indiana) for H141 processing (storage bulking).

Aerospace Booth Filters - Kawasaki Motors Manufacturing generates spent Aerospace Booth Filters Waste during the Aerospace Division manufacturing/painting process. This waste has been determined to be D001, D005, and F003 based on process and product knowledge. The annual quantity generated is estimated at about 350 pounds. Onsite the waste is stored in the CAA. Transport is by Tradebe Transportation to Tradebe Treatment and Recycling LLC (Indiana) for H141 processing (storage bulking).

Aerospace Waste Solvent & Paint - Kawasaki Motors Manufacturing generates spent Aerospace Waste Solvent & Paint during the Aerospace Division manufacturing/painting process. This waste has been determined to be D001 and D007 based on process and product knowledge. The annual quantity generated is estimated at about 350 pounds. Onsite the waste is stored in the CAA. Transport is by Tradebe Transportation to Tradebe Treatment and Recycling LLC (Indiana) for H141 processing (storage bulking).

Universal Waste - Kawasaki Motors Manufacturing generates universal waste during the maintenance process. During the visual inspection in Building 1, Maintenance Dock Area, I observed a Universal Wastes shelf unit of miscellaneous universal wastes including defective or spent batteries (alkaline and lithium rechargeables), lead acid batteries, defective LED lamps (the LED lamps are not required to be in a closed container), and defective electronic parts. All are labeled with the words “Universal Waste” and dated. The ballasts are treated as hazardous waste (see next section). See Photos 24-28.

PCB Ballasts - Kawasaki Motors Manufacturing generates waste fluorescent light ballasts during the maintenance process. They have determined these to be hazardous for the PCB's content. During the visual inspection, I observed a PCB waste SAA drum located in Building 1, Maintenance Dock Area, near the Universal Waste station. The drum was labeled with the words “Hazardous Waste” and “PCB’s” (see Photo 29). The 55-gallon drum was ½ full and is treated as hazardous waste (PCBs). It was labeled and closed. The drum appears to have been accumulating waste since July 27, 2021. Mr. Long stated that they do not treat this waste stream

as universal waste and that it is accumulating very slowly, and he estimated that it takes several years to fill one drum. Since it is a SAA container of hazardous waste it is not typically date-limited until full. Mr. Long stated that there have been no shipments or manifests of this waste in several years.

General Trash and Recyclable Cardboard - Kawasaki Motors Manufacturing generates about 1,211 tons per year of non-hazardous general trash and cardboard from shop, maintenance, and business office operations. General trash and cardboard are collected in the trash and cardboard compactors located in Building 3/ Recycling Room (see Photo 61). The general trash and cardboard are transported by Industrial Services (Lincoln, NE) to Lincoln County Landfill.

4.4 Other Areas Reviewed

Outside Facility Perimeter - I conducted a limited inspection of the outside perimeter of the facility and observed no hazardous waste storage tanks and containers except as noted above. See the aerial and map views in Attachment #1.

Central Accumulation Areas (CAA) – During the visual inspection, we identified two areas designated as CAAs. The Inside 90-Day Flammable Storage Room CAA and the Outside 90-Day Storage CAA. The Inside 90-Day Flammable Storage Room was co-located with the Paint Mix Room and contained nine 55-gallon drums, that were all full, all labeled with hazardous waste labels, and the nature of the hazard noted. There were also four pallets of shrink-wrapped 2-gallon cans of flammable liquids (each container appears to be individually labeled). All the drums and containers had accumulation start dates within 90 days. There was a No Smoking sign posted on the wall (see Photos 32-42 and 45).

I observed a one-gallon plastic jug labeled “D002” setting on top of a 55-gallon full black steel drum labeled as flammable and signage that listed its contents as: “*Barsol [solvent] / oil-soaked rags and Hex-chrome rags*”). This appeared to be two incompatible wastes stored close to each other without being separated or protected from each other (see Photos 32 and 35). A finding [NOPF 2] was issued for this. The small incompatible container on top of the 55-gallon drum was removed and relocated within the CAA by Mr. Long, resolving this NOPF at the time of the inspection.

- **NOPF 2: Failure to segregate incompatible hazardous waste in Indoor CAA as required in 128 10-004.01A5 [40 CFR 262.17(a)(1)(vii)(C)]**

In the Paint Mix Room/ Inside 90-Day CAA, I observed an explosive-proof landline phone with emergency info nearby (see Photo 38). I also observed a large solvent still in a room attached to the Paint Mix Room/ Inside 90-Day CAA. Mr. Long stated that the still was used to distill solvent for reuse and the still bottoms were collected in the black 55-gallon drum. labeled with hazardous waste labels. The still bottoms drum was about 1/3 full, labeled, and closed. At the base of the solvent still I observed what appears to be about one to two inches of dried solvent in the containment basin at the base of the still. The containment wall was only about ten inches high, and it was questionable if it could contain the full contents of the still if there were to be a loss of containment in the still tank (see Photos 39-41). Mr. Long stated that he was not very

familiar with Part 265 Subpart AA, BB, CC, and J requirements related to the still tank and that they do not do daily inspections of the still tank.

- **NOPF 3: Failure to operate hazardous waste equipment associated with the solvent still in compliance with 128 10-01Ab Ref 22-010 [40 CFR Part 265 Subpart BB]**
- **NOPF 4: Failure to operate hazardous waste equipment associated with the solvent still in compliance with 128 10-004.0B6 Ref 22-010 [40 CFR Part 265 Subpart J]**
- **NOPF 5: Failure to operate hazardous waste equipment associated with the solvent still in compliance with 128 10-004.0B6 Ref 22-021 [40 CFR Part 265 Subpart CC]**
- **NOPF 7: Failure to maintain and operate solvent still and associated tank to minimize the release of hazardous waste or fire or explosion as required in 128 17-002 [40 CFR 40 CFR 265.31]:**
 - b) Solvent still and tank**

In the Outside 90-Day Storage CAA, I observed about 75 drums and one 270-gallon tote of hazardous waste. All drums were full, labeled with hazardous waste labels, the nature of the hazard, and accumulation start dates. There appeared to be adequate aisle space for inspections. I observed nine 55-gallon steel drums, that were labeled to contain methyl ethyl ketone (MEK), that were bulging, kinked, and some cases rusted lids (see Photos 46-53).

- **NOPF 1: Failure to use hazardous waste containers in good condition, observed nine steel 55-gallon drums of hazardous waste (MEK) in the Outdoor CAA that were bulging, as required in 128 Ch 10 004.01A1 [40 CFR 262.17(a)(1)(iv)(A)]**

I also reviewed several dozen CAA Weekly Inspection forms (see Attachment #12 for a completed sample form). The weekly inspections of both CAAs appears to be complete.

Preparedness and Prevention – The facility has numerous fire extinguishers, spill kits, and eye wash stations. The Paint Booths have fire suppression systems. Mr. Long stated that all facility areas are under sprinkler systems. Mr. Long provided a copy of the facility's Contingency Plan. The plan appeared to be comprehensive and was last updated on July 24, 2023, but it appeared to be missing a required section on personnel emergency evacuation routes (see Attachment #13). I asked Mr. Long if Kawasaki Motors Manufacturing had shared the contingency plan and made and documented arrangements with their local emergency providers (fire department, emergency medical services, hospital, and police). He stated that they had sent a copy of the contingency plan to their local fire department and that the fire department generally visits this facility and does a walk-through annually. Mr. Long provided an email that he stated documented the Contingency Plan was sent to the fire department. The email had a date of May 25, 2022, over a year prior to the latest contingency plan revision, and the email only had a first name and no indication of what agency the recipient worked for (see Attachment 13 page 9).

- **NOPF 8: Failure to include personnel evacuation routes in RCRA Contingency Plan as required in 128 18-004.04 [40 CFR 262.261 Subpart M]**

- **NOPF 9: Failure to document submission of copies of Contingency Plan to emergency authorities as required in 128 18-004.04 [40 CFR 262.256(a)(1)]**

During our visual inspection in Building 8, E-Coat Area, I observed a steel 55-gallon drum, 9/10 full of Aerosol cans, labeled as hazardous waste and flammable, that was located within six inches of a large 480-volt electrical panel (see Photo 20). This appeared to be a potential safety hazard.

- **NOPF 7: Failure to maintain and operate SAA container to minimize the release of hazardous waste or fire or explosion as required in 128 17-002 [40 CFR 40 CFR 265.31]:**
 - a) **SAA steel drum of aerosol cans near a 480-volt electrical panel**

LQG Personnel Training – Mr. Crom provided a detailed presentation of their staff training, both initial and annual, for all staff with hazardous and universal waste handling responsibilities, as well as documentation of the training provided and computerized course completion documentation and certifications for the staff. They also provided job descriptions that indicate which staff and job codes have hazardous waste handling responsibilities and that indicate the requirement for both initial and annual hazardous waste handling training.

5.0 SUMMARY OF FINDINGS

- **NOPF 1: Failure to use hazardous waste containers in good condition, observed nine steel 55-gallon drums of hazardous waste (MEK) in the Outdoor CAA that were bulging, as required in 128 Ch 10 004.01A1 [40 CFR 262.17(a)(1)(iv)(A)]**
- **NOPF 2: Failure to segregate incompatible hazardous waste in Indoor CAA as required in 128 10-004.01A5 [40 CFR 262.17(a)(1)(vii)(C)]**
- **NOPF 3: Failure to operate hazardous waste equipment associated with the solvent still in compliance with 128 10-01Ab Ref 22-010 [40 CFR Part 265 Subpart BB]**
- **NOPF 4: Failure to operate hazardous waste equipment associated with the solvent still in compliance with 128 10-004.0B6 Ref 22-010 [40 CFR Part 265 Subpart J]**
- **NOPF 5: Failure to operate hazardous waste equipment associated with the solvent still in compliance with 128 10-004.0B6 Ref 22-021 [40 CFR Part 265 Subpart CC]**
- **NOPF 6: Failure to keep satellite accumulation area (SAA) containers closed as required in 128 10-005.01 Ref 10-004.01A2 [40 CFR 262.15(a)(4)]:**
 - a. **Lamp Crusher in Maintenance**
 - b. **Three buckets in Color Clear Line Building 1**
 - c. **One-gallon bucket in Graphics Dip Tank 2**

- **NOPF 7: Failure to maintain and operate solvent still and associated tank to minimize the release of hazardous waste or fire or explosion as required in 128 17-002 [40 CFR 40 CFR 265.31]:**
 - a) SAA steel drum of aerosol cans near a 480-volt electrical panel
 - b) Solvent still and tank
- **NOPF 8: Failure to include personnel evacuation routes in RCRA Contingency Plan as required in 128 18-004.04 [40 CFR 262.261 Subpart M]**
- **NOPF 9: Failure to document submission of copies of Contingency Plan to emergency authorities as required in 128 18-004.04 [40 CFR 262.256(a)(1)]**

Other than the items specifically noted in this narrative, I observed no additional issues or potential findings. However, further EPA review may change or add to my findings.

MARK HOLCOMB
(Affiliate)

Digitally signed by MARK
HOLCOMB (Affiliate)
Date: 2024.07.10
10:35:50 -05'00'

Mark Holcomb
Civil Investigator, SEE

AMBER WHISNANT

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AMBER WHISNANT
Date: 2024.07.31
13:57:36 -05'00'

Amber Whisnant
RCRA Section Chief, ECAD/Chemical Branch

Attachments:

- 1) Facility Aerial Map Views and Diagrams (5 pages)
- 2) Photo Log (61 photos and 66 pages)
- 3) Receipt for Documents (1 page)
- 4) Confidentiality Notice (1 page)
- 5) EPA RCRA Notification Acknowledgement/Verification Report (1 page)
- 6) NOPF (2 pages)
- 7) Waste Profiles and LDR (7 pages)
- 8) 2023 Nebraska Tier II Report (6 pages)
- 9) Uniform Hazardous Waste Manifests 9.11.2023 and 9.20,2023 (6 pages)
- 10) Invoice – Parts Cleaning Solvent (3 page)
- 11) SDS Parts Washer Solvent (22 pages)
- 12) Sample CAA Weekly Inspection Checklist (2 pages)
- 13) Contingency Plan and Email (10 pages)