

INSPECTION REPORT

Inspection Entry Date/Time	08/18/2023 09:26 AM (PT)	Announced: No	
Inspection Exit Date/Time	08/18/2023 04:31 PM (PT)	Access: Granted	
Regulatory Program	RCRA		
Type of Inspection	Compliance Evaluation Inspection (CEI)		
Company Name	PACCAR, Inc.		
Facility or Site Name	Kenworth Truck Co Renton		
Facility/Site Identifier	WAD988517934		
Facility/Site Physical Address	1601 N 8Th St		
City, State, Zip Code	Renton, WA 98057		
County/Borough	King County		
Generator Status	LQG		
NAICS	336120 – Heavy Duty Truck Manufacturing		
Type of Operation	Heavy Duty Truck Assembly		
Geographic Coordinates	47.491979, -122.196722		
Mailing Address/Secondary Address	Mr. Tom Nelson, Facilities Engineering Manager tom.nelson@paccar.com 1601 N 8Th St. Renton, WA 98057		
City, State, Zip Code	Renton, WA 98057		
Permit Number (If Applicable)	Not Applicable		
Lead Inspector:			
Jon Jones			
	EPA Region 10	Jones.Jon@epa.gov	(907) 227-4316
Supervisor Review:			
Matt Quarterman			
	EPA Region 10	Quarterman.matthew@epa.gov	(206) 553-2146

SECTION I – INTRODUCTION

Site Entry and Purpose of the Inspection

Type of inspection: Compliance Evaluation Inspection (CEI)

EPA Region 10 Lead Inspector, Jon Jones, arrived at the Kenworth Truck Co Renton Facility (the “Site” or “Facility”), located at 1601 N 8Th St, Renton, WA 98057, at 09:26 AM (PT) on 08/18/2023 for an unannounced inspection. EPA Region 10 Lead Inspector presented credentials to and informed Mr. Tom Nelson, Facilities Engineering Manager, that this was an EPA Region 10 inspection to determine compliance with Resource Conservation and Recovery Act (RCRA). The facility was inspected to ensure compliance with Washington’s federally authorized hazardous waste regulations found at Washington Administrative Code (WAC) 173-303.

Specifically, the inspection assessed compliance with WAC 173-303-573 universal waste management standards, WAC 173-303-515 requirements for management of used oil, and WAC 173-303-170 through 230 standards for hazardous waste generators. The inspection was conducted as a core program requirement for fiscal year 2023. This report is based on information supplied by Kenworth Truck Co Renton Facility representatives, observations made by the EPA Region 10 inspector, and records and reports maintained by the facility, but not limited to: direct observations made by the EPA Region 10 Inspector(s), photographs taken by EPA Region 10 inspector(s), physical evidence collected by the EPA Region 10 inspector(s), measurements or samples taken by EPA Region 10 inspector(s), verbal or written statements made by information supplied by the facility representatives during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA Region 10 inspector(s) by the facility representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or subsequent to the Inspection from a review of USEPA, State, and public records may be included in this report.

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/EPA Region 10	Jon Jones	(907) 271-6329	Jones.Jon@epa.gov	Yes	Yes
EPA Region 10	Matt Quarterman			Yes	Yes
Washington Department of Ecology	Susan Dier			Yes	Yes
Facilities Engineering Manager/Kenworth	Tom Nelson	(425) 269-0150	tom.nelson@paccar.com	Yes	Yes

Opening Conference

We met with security at the facility's delivery entrance guard shack upon arrival and explained the purpose of our visit and asked to see Mr. Tom Nelson, Facilities Engineering Manager. While waiting for Mr. Nelson to arrive, we parked our vehicle across from the guard shack. Once Mr. Nelson arrived, we walked to the administrative offices and went into a conference room to begin the opening conference. During the opening conference, Mr. Charles Newberry, Assistant Plant Manager, stopped by the conference room briefly to introduce himself and to see if Mr. Nelson required any assistance.

I presented my credentials to Mr. Nelson and informed him that this was an EPA RCRA inspection. The table above presents all the inspection opening and closing conference participants.

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. We also observed the facility's universal waste and used oil management.

Only those areas in which I observed areas of concern or noted other pertinent issues are discussed in this inspection report.

Facility/Site Information

What type of generator facility verified as?	Verified Large Quantity Generator (LQG) by Tom Nelson
What type of generator facility notified?	LQG
Size of Facility	40 acres
Safety Training Provided to Inspector(s)?	No
Operating Hours	Two shifts. Monday through Friday from 6:30 a.m. to 3:30 p.m. and 3:00 p.m. to 11:30 p.m.
Length of Facility at Location	Since 1993
Number of employees	550

Process Description

Mr. Nelson told us that the facility had multiple satellite accumulation areas (SAA) along the main assembly lines and one central accumulation area (CAA) that was located in Building 2.

We asked about the generation of hazardous waste pharmaceuticals and Mr. Nelson had no information about it. It was unclear about whether they need to notify under Subpart P. Ms. Susan Dier, Ecology, provided some information to Mr. Nelson about the pharmaceutical program run by Ecology.

We asked about any changes that had taken place at the facility since the last inspection in 2019. Mr. Nelson told us about changes for introducing battery vehicles onto the main assembly line and inline paint thinner recycling center. He told us the inline paint thinner system went down earlier in 2023 (June), and they generated an abundance of the paint thinner waste.

Mr. Nelson told us the facility was assembly only and not a manufacturer. He said all of the parts come into the facility and are assembled. Information regarding the following wastes, generated by the facility, was obtained from Mr. Nelson and the facility's Annual Reports:

- Waste aerosol cans – D001, D035
- Waste solvent contaminated debris – F003, F005
- Waste solvent contaminated debris (WA State Only Waste) – Special Waste
- Waste gloves – D004, D005, D006, D007, D008, D010 (Includes leather gloves)
- Waste paint liquid, thinner, and paint solids – D001, D003
- Waste central vac system debris – D006
- Dual waste-infectious/Pharmaceutical waste – P001, P075, P188, P204, U010, U035
- Waste paint related material – D001, F003
- Waste thinner/still bottoms – D001, F003
- Weld booth exhaust filters, bump, and grind filters – D006
- Waste contaminated absorbents – D035, F005
- Universal waste-Lamps (four-foot and eight-foot lamps)
- Used oil and used antifreeze

We were accompanied during the entire inspection by Mr. Nelson and intermittently by Mr. Dennis Johnson, Wastewater and Hazardous Waste Technician.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Assembly Building		Yes
Axle Weld Booth		Yes
Used oil storage		Yes
Cab build line	SAA	Yes
SAA	Southside of the cab build line: Accumulation of waste shop towels	Yes
SAA	Northside of the cab build line: Accumulation of waste solvent contaminated debris managed as a special waste.	No
Cab Trim		Yes
SAA	Accumulation of waste	Yes
Central Vac	SAA for the accumulation of waste central vacuum system debris	Yes
Dock G	Used oil collection area	Yes
Frame Floor	SAA for waste gloves	Yes
SAA	Accumulation of waste gloves , waste aerosols, and waste solvent contaminated debris.	Yes
Main Paint		Yes
Maintenance Shop		No
Prime Paint Booth	SAA for waste gloves and waste shop towels	Yes
North side of chassis prep booth		Yes
SAA	Accumulation of waste liquid paint	Yes
Paint Mix Room		Yes
SAA	Accumulation of waste liquid paint and waste gloves	Yes
Safety & Medical	Dual waste SAA	Yes
SAA	Accumulation of dual waste (red bag and medications/pharmacy)	Yes
Sand and repair booth		Yes
SAA	Accumulation of waste gloves and waste shop towels	Yes
Sleeper build line		Yes
SAA	Accumulation of waste solvent contaminated debris managed as a special waste.	No
SAA	Accumulation of waste central vacuum system debris	Yes
Sleeper Trim		Yes

SAA	Accumulation of waste gloves and waste aerosol cans	Yes
Startup		Yes
CAA	Accumulation of waste gloves	Yes
Tool Room (Eastside)		Yes
CAA	Accumulation of waste gloves	Yes
Touch up booth		Yes
Touch up booth day room	SAA for waste liquid paint and waste shop towels	Yes
Weld Booth		Yes
SAA	Accumulation of waste gloves	No
West Cab Buck		Yes
Windshield Set		Yes
SAA	Accumulation of waste gloves	Yes
Building 2		Yes
CAA		Yes
Spent Lamp Recycling Area	Accumulation of UW lamps	Yes
Waste Processing Area		Yes
WWT Unit		Yes
SAA	Accumulation of waste aerosol cans	Yes

SECTION II – OBSERVATIONS

Building: Assembly Building /Frame Floor			
Observation #: JJ1-OB-001	Date: 08/18/2023	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Tom Nelson		Title: Facilities Engineering Manager	
While on the Frame Floor we saw a black, five-gallon step-can that the facility was using as a satellite accumulation area (SAA) container for the accumulation of waste gloves. At the time of the inspection, the SAA container was not closed. A waste glove had not been completely placed into the container and a portion of the glove was left hanging over the side of the container, preventing the lid from completely closing and making a complete seal with the container. Mr. Nelson placed the waste glove completely inside the container and closed the lid during the inspection.			
Photo(s) 1. IMG-2023081810213021302323070.jpg 2. IMG-2023081810214021402345769.jpg 3. IMG-2023081810221722172154341.jpg 4. IMG-2023081810222822282372063.jpg			

Building: Assembly Building /Frame Floor/SAA			
Observation #: JJ1-OB-002	Date: 08/18/2023	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Tom Nelson		Title: Facilities Engineering Manager	
While we were still on the frame floor, we inspected what Mr. Nelson told us was the SAA. While there, I noticed that there were three, black, 55-gallon SAA containers. There was an SAA container for waste gloves, one for waste aerosols, and another for waste solvent contaminated debris. Mr. Nelson said that waste aerosols and waste solvent contaminated debris were placed in their respective 55-gallon SAA containers when generated. According to Mr. Nelson, when the five-gallon SAA step-cans of waste gloves on the Frame Floor become full, they are emptied into the 55-gal SAA container. I explained to Mr. Nelson that hazardous waste cannot be accumulated in one SAA container and then transferred into another SAA container. I told Mr. Nelson that if the facility was using five-gallon SAA step-cans at or near the point of generation to accumulate waste gloves, then the 55-gallon container of waste gloves, located in their SAA, was an accumulation container, requiring an accumulation start date (ASD) when the first waste glove was placed in the container as well as weekly hazardous waste inspections. At the time of the inspection, the black, 55-gallon container that held waste gloves was not marked with an ASD and the facility had not been conducting weekly hazardous waste inspections of the container. Mr. Nelson contacted Mr. Dennis Johnson, Hazardous Waste Technician, during the inspection and told him that the 55-gallon container they had been utilizing as a SAA container, would now need to be managed as an accumulation container, requiring both an ASD and weekly inspections. Following the inspection, I received an email from Mr. Nelson, on 8/28/23, that included an attached Excel spreadsheet, titled "2023 EPA Areas of Concern," which contained information and photos documenting the corrective action taken by the facility. In that spreadsheet, Mr. Nelson states, "Updating procedure to manage all 55-gallon waste glove drums as CAA with 90 days accumulation limit, also modifying weekly inspection PM to include reference to these drum locations."			
Photo(s)			
1. IMG-2023081810295729572377348.jpg 2. IMG-202308181030083082495969.jpg 3. IMG-2023081810302130212483284.jpg 4. IMG-2023081810302730272547265.jpg			

Building: Assembly Building /Frame Floor			
Observation #: JJ1-OB-003	Date: 08/18/2023	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Tom Nelson		Title: Facilities Engineering Manager	
While we were still on the frame floor, we saw another five-gallon step-can SAA being used for the accumulation of waste gloves. The container was closed and labeled with the words "Hazardous Waste," but there was no hazard/risk indicator on the container. In the facility's "2023 EPA Areas of Concern" corrective action spreadsheet, Mr. Nelson stated, "Risk label was put on." A photo was also included documenting this corrective action.			
Photo(s)			
1. IMG-2023081810362036202706370.jpg 2. IMG-2023081810362636262455438.jpg 3. IMG-2023081810363436342440540.jpg			

Building: Assembly Building /Frame Floor			
Observation #: JJ1-OB-004	Date: 08/18/2023	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Tom Nelson		Title: Facilities Engineering Manager	
While still on frame floor, we saw an emergency eye wash station between assembly lines that was a missing its eye wash bottle. According to facility personnel, they didn't know how long it had been missing. In the facility's "2023 EPA Areas of Concern" corrective action spreadsheet, Mr. Nelson stated, "Resolved during inspection - Fresh bottle of eye wash solution installed at the station." A photo was also included documenting this corrective action.			
Photo(s)			
1. IMG-2023081810405840582590014.jpg			

Building: Assembly Building /North side of chassis prep booth/SAA			
Observation #: JJ1-OB-005	Date: 08/18/2023	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Tom Nelson		Title: Facilities Engineering Manager	
While at the SAA, we saw a 55-gallon SAA container of waste liquid paint that was not closed. At the time of the inspection, the SAA container had an attached funnel with lid that was not closed. Facility personnel closed the lid on the attached funnel of the container during the inspection. In the facility’s “2023 EPA Areas of Concern” corrective action spreadsheet, Mr. Nelson stated, “Resolved during inspection - Paint operator closed funnel and latched closure device.”			
Photo(s)			
1. IMG-2023081810571457142155863.jpg			
2. IMG-2023081810572957291988960.jpg			
3. IMG-2023081810574057402110953.jpg			
4. IMG-2023081810585258522181755.jpg			

Building: Assembly Building /Startup			
Observation #: JJ1-OB-006	Date: 08/18/2023	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Tom Nelson		Title: Facilities Engineering Manager	
While in startup, we saw a five-gallon SAA step-can for waste gloves that was not closed. At the time of the inspection, the step-can lid was bowed and did not make a complete seal with the container when closed. In the facility’s “2023 EPA Areas of Concern” corrective action spreadsheet, Mr. Nelson stated, “Step-can was full, so it wasn’t fully closed. Employees were informed to not overflow and dispose when 3/4 full.”			
Photo(s)			
1. IMG-202308181109589582492376.jpg			
2. IMG-202308181110061062397778.jpg			

Building: Assembly Building /Startup/CAA**Observation #:** JJ1-OB-007**Date:** 08/18/2023**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Tom Nelson**Title:** Facilities Engineering Manager

On the south side of chassis oven, we saw a 55-gallon accumulation container of waste gloves. At the time of the inspection, the container was not marked with an ASD and the facility was not conducting weekly inspections of the container.

In the facility's "2023 EPA Areas of Concern" corrective action spreadsheet, Mr. Nelson stated, "Updating procedure to manage all 55-gallon waste glove drums as CAA with 90 days accumulation limit, also modifying weekly inspection PM to include reference to these drum locations."

Photo(s)

1. [IMG-20230818112202222511799.jpg](#)
2. [IMG-2023081811221222123029101.jpg](#)
3. [IMG-2023081811221822182795700.jpg](#)

Building: Assembly Building /Dock G**Observation #:** JJ1-OB-008**Date:** 08/18/2023**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Tom Nelson**Title:** Facilities Engineering Manager

While on loading Dock G, we saw a 55-gallon container the facility was using to collect used oil. At the time of the inspection, the 55-gallon used oil container was not closed. The container had a drum top funnel that was attached. The drum top funnel had a hinged lid at one time; however, at some point the lid had come off leaving the container open. Facility personnel searched the immediate area, trying to locate the lid, but it was nowhere to be found.

In the facility's "2023 EPA Areas of Concern" corrective action spreadsheet, Mr. Nelson stated, "Funnel was replaced with one that has lid, lid was closed."

Photo(s)

1. [IMG-2023081811284528452868003.jpg](#)
2. [IMG-2023081811285728572364549.jpg](#)

Building: Assembly Building /Cab build line (North side)/SAA**Observation #:** JJ1-OB-009**Date:** 08/18/2023**Contains AOC:** No**Contains CBI:** No**Person Interviewed:** Tom Nelson**Title:** Facilities Engineering Manager

While at the SAA, we saw a yellow, five-gallon SAA step-can being used to accumulate waste solvent debris. At the time of the inspection, the container was not marked with a hazard/risk indicator and was not closed. The lid of the step-can was not making a complete seal with the container. While we were in this area, Mr. Nelson told us that he didn't think the contents of the container was a hazardous waste. He said he thought the waste had been designated as a special waste. Mr. Johnson, Hazardous Waste Technician, was called back again by Mr. Nelson. When Mr. Johnson arrived, he confirmed that the waste solvent debris being accumulated in the yellow, five-gallon step-can was mis-labeled. He told us that the waste was not hazardous and was being managed as a special waste. Mr. Nelson asked Mr. Johnson to re-label the container with a special waste label. Mr. Nelson provided us with a copy of the Safety Data Sheet (SDS) for the product during the inspection closing.

conference. We reviewed the SDS, during the inspection, which indicated that the product was not hazardous. Special waste is a category of Washington state-only dangerous waste.

In the facility's "2023 EPA Areas of Concern" corrective action spreadsheet, Mr. Nelson stated, "Container was mislabeled, it has been relabeled as Special Waste." A photo was also included, showing the corrective action.

Photo(s)

1. [IMG-2023081811391139112452947.jpg](#)
2. [IMG-2023081811392139212443622.jpg](#)
3. [IMG-2023081811395939592518461.jpg](#)

Building: Assembly Building /Cab build line (South side)

Observation #: JJ1-OB-010 **Date:** 08/18/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Tom Nelson **Title:** Facilities Engineering Manager

While in the Cab build line, we saw a five-gallon SAA step-can that held waste shop towels. At the time of the inspection, the container was not closed. The step-can lid was not making a complete seal on the container.

In the facility's "2023 EPA Areas of Concern" corrective action spreadsheet, Mr. Nelson stated, "This step-can was removed from service."

Photo(s)

1. [IMG-2023081811503450342827283.jpg](#)
2. [IMG-2023081811504150412530435.jpg](#)

Building: Assembly Building /Sleeper build line/SAA

Observation #: JJ1-OB-011 **Date:** 08/18/2023 **Contains AOC:** No **Contains CBI:** No

Person Interviewed: Tom Nelson **Title:** Facilities Engineering Manager

While in the Sleeper build line, we saw a five-gallon SAA step-can that contained waste solvent contaminated debris that was not closed. The lid on the step-can had become bowed or twisted and was no longer making a complete seal with the container. The SAA step-can was also not labeled with the words "Hazardous Waste," or marked with a hazard/risk indicator. Mr. Johnson stepped in and confirmed that this waste solvent contaminated debris was also supposed to be managed as a state special waste.

In the facility's "2023 EPA Areas of Concern" corrective action spreadsheet, Mr. Nelson stated, "This step-can wasn't fully closed due to bigger liner was used. Employee has been informed to use smaller liners to make sure the lid is fully closed." A photo was included to show that the facility had labeled the container "Special Waste."

Photo(s)

1. [IMG-202308181159065962517106.jpg](#)
2. [IMG-2023081811591659162383440.jpg](#)
3. [IMG-2023081811592459242481487.jpg](#)

Building: Assembly Building /Sleeper build line/SAA

Observation #: JJ1-OB-012 **Date:** 08/18/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Tom Nelson **Title:** Facilities Engineering Manager

While in the Sleeper build line, we saw a 55-gallon SAA container that held waste central vacuum system debris (CVSD). At the time of the inspection, the container was not marked with a hazard/risk indicator.

In the facility's "2023 EPA Areas of Concern" corrective action spreadsheet, Mr. Nelson stated, "Resolved during inspection. Toxic risk label added to drum." A photo was included to show that the facility had labeled the container with a hazard/risk indicator.

Photo(s)

1. [IMG-202308181203573572916199.jpg](#)
2. [IMG-20230818120404442809167.jpg](#)

Building: Assembly Building /Windshield Set

Observation #: JJ1-OB-013

Date: 08/18/2023

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Tom Nelson

Title: Facilities Engineering Manager

While in the Windshield Set area, we saw a 55-gallon SAA of waste solvent contaminated debris was not closed. The lid was not latched and did not make a complete seal with container. While talking with facility personnel in this area, we were informed that the five-gallon SAA step-cans, in the area, that contained waste solvent contaminated debris were being emptied in the 55-gallon SAA; therefore the 55-gallon container of waste solvent contaminated debris was not an SAA container but was an accumulation container. According to Mr. Nelson and other facility personnel, this was not the same waste solvent contaminated debris that was managed as special waste. Mr. Nelson told us that the waste solvent contaminated debris in the Windshield Set area was a hazardous waste.

At the time of the inspection, the 55-gallon accumulation container of waste solvent contaminated debris was not closed, not marked with an ASD, and was not being inspected weekly.

In the facility's "2023 EPA Areas of Concern" corrective action spreadsheet, Mr. Nelson stated, "Latch was adjusted to be fully closed." A photo was included to show that the facility had made the adjustment and closed the container.

Photo(s)

1. [IMG-202308181224022422627685.jpg](#)
2. [IMG-202308181224092492534715.jpg](#)

Building: Assembly Building /Windshield Set

Observation #: JJ1-OB-014

Date: 08/18/2023

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Tom Nelson

Title: Facilities Engineering Manager

While still in the Windshield Set area, we saw a small brown trash receptacle that was labeled with the words "Hazardous Waste" and being used as a SAA container to accumulate waste solvent contaminated debris. At the time of the inspection, the container was not marked with a hazard/risk indicator and there was no lid for the container, so it was not closed. At the time of the inspection, the contents of the small brown trash receptacle SAA, when full, were being transferred into a 55-gallon SAA container for the same waste.

Mr. Nelson had facility personnel, in the area, remove the container from service and transfer the contents into the 55-gallon accumulation container during the inspection.

In the facility's "2023 EPA Areas of Concern" corrective action spreadsheet, Mr. Nelson stated, "This container was removed from service."

Photo(s)

1. [IMG-2023081812281328132751506.jpg](#)
2. [IMG-2023081812282528252165140.jpg](#)
3. [IMG-2023081812283128312873725.jpg](#)

Building: Assembly Building /Windshield Set/SAA**Observation #:** JJ1-OB-015**Date:** 08/18/2023**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Tom Nelson**Title:** Facilities Engineering Manager

While still in the Windshield Set area, we saw a five-gallon, yellow SAA step-can that was labeled as waste solvent contaminated debris but when it was opened, we saw that it contained waste gloves. At the time of the inspection, the container was not closed. Once again, the lid was either bowed or twisted and would not make a complete seal with the container when closed.

In the facility's "2023 EPA Areas of Concern" corrective action spreadsheet, Mr. Nelson stated, "This container was emptied and removed from service."

Photo(s)

1. [IMG-2023081812333933392594340.jpg](#)
2. [IMG-2023081812334633462510349.jpg](#)
3. [IMG-202308181234043442196221.jpg](#)

Building: Assembly Building /Cab Trim/SAA**Observation #:** JJ1-OB-016**Date:** 08/18/2023**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Tom Nelson**Title:** Facilities Engineering Manager

While in the Cab Trim area of the Assembly Building, we saw a small black plastic trash receptacle with an approximately five-gallon capacity. Personnel in the area were using the trash receptacle as an SAA container. We could see that the container held some sort of used wipes. According to Mr. Nelson, the container held wipes that were contaminated with deodorized mineral spirits. At the time of the inspection, the container was labeled with the words, "Hazardous Waste," but the container was not closed and not marked with a hazard/risk indicator. At the time of the inspection, the contents of this SAA container (when full) were being transferred to another, larger (55-gallon) SAA container.

Mr. Nelson had facility personnel transfer the contents of the container into a nearby 55-gallon accumulation container of waste solvent contaminated debris.

In the facility's "2023 EPA Areas of Concern" corrective action spreadsheet, Mr. Nelson stated, "Resolved during inspection. Can was emptied and removed from service."

Photo(s)

1. [IMG-2023081812383138312219400.jpg](#)
2. [IMG-2023081812383538352262473.jpg](#)
3. [IMG-2023081812383938392236772.jpg](#)

Building: Assembly Building /West Cab Buck**Observation #:** JJ1-OB-017**Date:** 08/18/2023**Contains AOC:** Yes**Contains CBI:** No

Person Interviewed: Tom Nelson	Title: Facilities Engineering Manager
While inspecting the West Cab Buck area we saw that facility personnel working in this area had been placing wooden popsicle sticks contaminated with hazardous waste sealant onto the cab buck. These wooden popsicle sticks contaminated with hazardous waste sealant were found stuck to the frame of the cab buck. We also saw that it looked as though waste sealant had been smeared/wiped onto the frame of the cab buck. At the time of the inspection, the waste was not containerized. In the facility's "2023 EPA Areas of Concern" corrective action spreadsheet, Mr. Nelson stated, "Operators were informed to dispose sealant sticks properly in the Solvent Contaminated Debris container, nearby."	
Photo(s) 1. IMG-2023081812463846382371937.jpg	

Building: Assembly Building /Safety & Medical			
Observation #: JJ1-OB-018	Date: 08/18/2023	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Tom Nelson		Title: Facilities Engineering Manager	
While in the on-site medical clinic, we saw a blue, 10-to-12-gallon, poly container of dual waste in their SAA that was not marked with a hazard/risk indicator. The container ring was not attached and closed; however, the lid was attached and made a complete seal with the top of the container. In the facility's "2023 EPA Areas of Concern" corrective action spreadsheet, Mr. Nelson stated, "Risk label was put on." The spreadsheet also included a photo documenting the corrective action.			
Photo(s) 1. IMG-2023081812533453342228869.jpg 2. IMG-2023081812533953391993759.jpg			

Building: Assembly Building /Tool room (Eastside)/CAA			
Observation #: JJ1-OB-020	Date: 08/18/2023	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Tom Nelson		Title: Facilities Engineering Manager	
As we left the Medical Clinic, we headed back out into the Assembly building. Just as we were leaving, I saw some 55-gallon containers and went to inspect them. We saw a 55-gal container of waste gloves was not closed. Mr. Nelson indicated that the container was a SAA container for waste gloves; however, based on what we were seeing at the facility, in the way of SAA waste management, the container was not an SAA but an accumulation container. At the time of the inspection, the rubber gasket in the lid had come loose and was dangling down by the side of the container and the attached drum closure device was not adjusted properly so that the container would close and make a complete seal with the top of the container. There was also no ASD marked on the container and it was not being inspected weekly. In the facility's "2023 EPA Areas of Concern" corrective action spreadsheet, Mr. Nelson stated, "All drum closure device/latch were adjusted to be fully closed and updating procedure to manage all 55-gallon waste glove drums as CAA with 90 days accumulation limit, also modifying weekly inspection PM to include reference to these drum locations."			

Photo(s)

1. [IMG-202308181305115112705145.jpg](#)
2. [IMG-202308181305185182245098.jpg](#)
3. [IMG-202308181305265262532627.jpg](#)

Building: Assembly Building /Tool Room/SAA**Observation #:** JJ1-OB-021**Date:** 08/18/2023**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Tom Nelson**Title:** Facilities Engineering Manager

While we inspected this area, we saw a 55-gallon accumulation container of waste gloves that was staged next to a five-gallon SAA container of waste gloves. According to Mr. Nelson, the facility was managing the 55-gallon containers as SAA containers and transferring the contents of the five-gallon SAA containers into them. At the time of the inspection, the 55-gallon accumulation container of waste gloves did not have an ASD and was not being inspected weekly.

In the facility's "2023 EPA Areas of Concern" corrective action spreadsheet, Mr. Nelson stated, "Updating procedure to manage all 55-gallon waste glove drums as CAA with 90 days accumulation limit, also modifying weekly inspection PM to include reference to these drum locations."

Photo(s)

1. [IMG-2023081813173317332964846.jpg](#)
2. [IMG-2023081813173917393016644.jpg](#)
3. [IMG-2023081813174517452701646.jpg](#)

Building: Assembly Building /Weld Booth**Observation #:** JJ1-OB-022**Date:** 08/18/2023**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Tom Nelson**Title:** Facilities Engineering Manager

While inspecting this area, we saw a yellow, 10-gallon step-can that held a pair of waste gloves. At the time of the inspection, step-can was labeled with the words "Clean Rags" and not labeled with the words "Hazardous Waste" or marked with a hazard/risk indicator.

Mr. Nelson removed the waste gloves from container during the inspection and placed them into a labeled container for waste gloves.

While still in the area, we also saw what appeared to be a waste aerosol can that was on a cart. Shop personnel verified that the aerosol can was a waste aerosol. The waste aerosol can was removed from the cart and placed inside of a waste aerosol container.

In the facility's "2023 EPA Areas of Concern" corrective action spreadsheet, Mr. Nelson stated, "Resolved during inspection - A single pair of used gloves removed from the step can and placed in appropriate nearby waste container and aerosol waste can was placed in a 55-gallon drum for waste aerosols."

Photo(s)

1. [IMG-2023081813235823582641531.jpg](#)
2. [IMG-202308181324052452736139.jpg](#)
3. [IMG-2023081813241324132128525.jpg](#)
4. [IMG-2023081813282428242591769.jpg](#)
5. [IMG-2023081813283128313081343.jpg](#)
6. [IMG-2023081813284728472670775.jpg](#)

Building: Assembly Building /Axle Weld Booth/Used oil storage**Observation #:** JJ1-OB-023**Date:** 08/18/2023**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Tom Nelson**Title:** Facilities Engineering Manager

While in this area, we saw a 55-gallon used oil container that was not closed. The container had an attached funnel with a lid and the lid was not closed.

We also saw a 55-gallon SAA container labeled with the words "Hazardous Waste" that was connected to dust collector equipment for the collection of waste welding dust. At the time of the inspection, the container was not marked with a hazard/risk indicator.

In the facility's "2023 EPA Areas of Concern" corrective action spreadsheet, Mr. Nelson stated, "lid was closed, and risk label was put on." Photo documentation was also included to show the corrective action taken.

Photo(s)

1. [IMG-2023081813331233122334860.jpg](#)
2. [IMG-2023081813354235422534027.jpg](#)
3. [IMG-2023081813355235522446192.jpg](#)

Building: Assembly Building /Main Paint/Prime paint booth**Observation #:** JJ1-OB-024**Date:** 08/18/2023**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Tom Nelson**Title:** Facilities Engineering Manager

While inspecting this area, we saw a five-gallon waste glove SAA step-can container that was not marked with a hazard/risk indicator.

In the facility's "2023 EPA Areas of Concern" corrective action spreadsheet, Mr. Nelson stated, "Risk label was put on." Photo documentation was also included to show the corrective action taken.

Photo(s)

1. [IMG-2023081813495149512453694.jpg](#)
2. [IMG-2023081813495649562334095.jpg](#)

Building: Assembly Building / Main Paint /Sand-and-Repair booth**Observation #:** JJ1-OB-025**Date:** 08/18/2023**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Tom Nelson**Title:** Facilities Engineering Manager

While inspecting this area, we saw a ~10-gallon SAA step-can container of waste gloves that was not closed and not marked with a hazard/risk indicator.

We also saw a six-gallon SAA step-can container of waste shop towels that was not marked with the words "Hazardous Waste" or a hazard/risk indicator.

In the facility's "2023 EPA Areas of Concern" corrective action spreadsheet, Mr. Nelson stated, "Waste glove can was replaced with functional lid that could be fully closed. The new container was labeled properly." For the Waste Shop Towel container, Mr. Nelson stated, "Proper labels were placed on the container." Photo documentation was also included, showing the corrective action taken.

Photo(s)

1. [IMG-2023081813572157213300931.jpg](#)
2. [IMG-2023081813572757272843162.jpg](#)
3. [IMG-2023081813593459344019847.jpg](#)
4. [IMG-2023081813594259424436592.jpg](#)

Building: Assembly Building /Paint Mix Room/SAA

Observation #: JJ1-OB-026

Date: 08/18/2023

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Tom Nelson

Title: Facilities Engineering Manager

While inspecting this area, we saw a 55-gallon SAA container of waste liquid paint. At the time of the inspection, the container was not closed. The small bung plug was missing and not screwed into the bung.

We also saw a six-gallon SAA step-can container of waste gloves that was not closed. The lid was not functioning properly and was not making a complete seal with the container.

Prior to leaving the area, we saw another six-gallon SAA step-can container of waste shop towels that was not closed. The lid was not functioning properly and was not making a complete seal with the container.

In the facility's "2023 EPA Areas of Concern" corrective action spreadsheet, Mr. Nelson stated, "The small bung was put back in position and closed. Informed employee and department manager to make sure all hazardous waste containers have to be fully closed."

"Step-can for the waste gloves was replaced"

"This step-can for waste shop towels was removed from service. There is a 55-gallon drum nearby for this Wastestream."

Photo(s)

1. [IMG-202308181410051052677016.jpg](#)
2. [IMG-2023081814101010102481850.jpg](#)
3. [IMG-2023081814114311432854408.jpg](#)
4. [IMG-2023081814115311532132169.jpg](#)
5. [IMG-202308181412021222594775.jpg](#)
6. [IMG-2023081814133913392409509.jpg](#)
7. [IMG-2023081814135513552285549.jpg](#)

Building: Assembly Building /Central Vac**Observation #:** JJ1-OB-027**Date:** 08/18/2023**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Tom Nelson**Title:** Facilities Engineering Manager

While in this area, just outside the building, we saw a 55-gallon SAA container for waste particulate that was connected to a cyclone separator. At the time of the inspection, the waste container was labeled with the words "Hazardous Waste," and a Class 9 DOT label, but was not marked with a hazard/risk indicator that was specific to the hazard/risk.

In the facility's "2023 EPA Areas of Concern" corrective action spreadsheet, Mr. Nelson stated, "Risk label was put on." Photo documentation was also included showing the corrective action.

Photo(s)

1. [IMG-202308181423002303511107.jpg](#)
2. [IMG-2023081814231023104042312.jpg](#)
3. [IMG-2023081814231723172754167.jpg](#)

Building: Assembly Building /Touch up booth/Touch up booth day room**Observation #:** JJ1-OB-028**Date:** 08/18/2023**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Tom Nelson**Title:** Facilities Engineering Manager

While in this area, we saw a 55-gallon SAA container of waste liquid paint that was not closed. The container had an attached funnel with a lid that was not closed, and the small bung opening was also not closed. The small bung plug had been cross threaded and wasn't screwed back in properly preventing the plug from making a complete seal. Mr. Nelson removed the plug and re-screwed the small bung plug back into the container, and closed and latched the funnel lid, closing the container during the inspection.

In the facility's "2023 EPA Areas of Concern" corrective action spreadsheet, Mr. Nelson stated, "Resolved during inspection - Bung replaced and funnel closure device latched."

Photo(s)

1. [IMG-2023081814323632362448237.jpg](#)
2. [IMG-2023081814324232422534772.jpg](#)
3. [IMG-2023081814325132512227627.jpg](#)
4. [IMG-2023081814325832582527901.jpg](#)
5. [IMG-2023081814334133412485648.jpg](#)

Building: Building 2/WWT Unit/SAA**Observation #:** JJ1-OB-029**Date:** 08/18/2023**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Tom Nelson**Title:** Facilities Engineering Manager

While walking through the facility's wastewater treatment (WWT) unit, we saw a 15-gal container labeled "Empty Aerosol Cans." The container appeared to be a Satellite accumulation container. There was a hole in the lid of the container, allowing waste aerosol cans to be placed into the container without having to remove the lid. Mr. Nelson made the comment that he wasn't sure where the container came from. We opened the container to see what was inside and saw that it held one waste aerosol can. At the time of the inspection, the 15-gallon SAA container contained one waste aerosol can and was not closed, not labeled with the words

“Hazardous Waste,” and not marked with a hazard/risk indicator. Mr. Nelson removed the waste aerosol can and placed it into another 55-gallon SAA container for that waste and removed the 15-gallon container from service during the inspection.

In the facility’s “2023 EPA Areas of Concern” corrective action spreadsheet, Mr. Nelson stated, “Resolved during inspection - Drum removed from service, single aerosol can was moved to 55-gallon satellite drum.”

Photo(s)

1. [IMG-2023081814394139412551366.jpg](#)
2. [IMG-2023081814394639462496240.jpg](#)
3. [IMG-2023081814395039502482439.jpg](#)

Building: Building 2/Waste Processing Area

Observation #: JJ1-OB-030 **Date:** 08/18/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Tom Nelson **Title:** Facilities Engineering Manager

Mr. Johnson and a co-worker were processing waste when we arrived. While in the facility’s waste processing area, we saw a pallet containing four, 55-gallon hazardous waste containers that was straddling the waste containment drain. The pallet was positioned in such a way that two of the four containers were within the containment area and the other two hazardous waste containers were outside the containment area between the drain and a roll up door. Mr. Nelson had Mr. Johnson move the pallet of hazardous waste back into the containment area during the inspection.

In the facility’s “2023 EPA Areas of Concern” corrective action spreadsheet, Mr. Nelson stated, “Resolved during inspection - The pallet of four drums was moved so that all four were inside the containment area.”

Photo(s)

1. [IMG-2023081814513551352274149.jpg](#)
2. [IMG-2023081814515751572488144.jpg](#)
3. [IMG-202308181452075272223924.jpg](#)

Building: Building 2/Spent Lamp Recycling Area

Observation #: JJ1-OB-031 **Date:** 08/18/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Tom Nelson **Title:** Facilities Engineering Manager

From the waste processing area, we went over to the facility’s spent lamp recycling area. While in the area, we saw a cardboard box that the facility was using to accumulate eight-foot, waste/spent fluorescent lamps. The facility manages waste/spent lamps as universal waste. While inspecting the container, we saw that the container was labeled with the words “Universal Waste – Lamps” and marked with the date 7/5/22. At the time of the inspection, the box of eight-foot waste fluorescent lamps had been in accumulation for greater than one year. According to the date on the container, as of the date of the inspection (8/18/23), the waste lamps have been in accumulation at the facility for 409 days.

In the facility’s “2023 EPA Areas of Concern” corrective action spreadsheet, Mr. Nelson stated, “The out-of-date box of used fluorescent lamps was shipped offsite on 8/22/2023 to EcoLights Fluorescent Lamp Recycling under their BOL#47905.”

Photo(s)

1. [IMG-202308181500450452628432.jpg](#)
2. [IMG-202308181500530532803378.jpg](#)

Building: Building 2/CAA**Observation #:** JJ1-OB-032**Date:** 08/18/2023**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Tom Nelson**Title:** Facilities Engineering Manager

While inspecting the facility's central accumulation area (CAA), we saw three 275-gal totes that, according to the labels held water contaminated with solvent. All three totes were labeled with the words "Hazardous Waste," but none of the three totes were marked with hazard/risk indicators. Mr. Johnson labeled all three totes with a "Toxic" hazard/risk indicator label during the inspection.

In the facility's "2023 EPA Areas of Concern" corrective action spreadsheet, Mr. Nelson stated, "Resolved during inspection - A Toxic risk label was added to each of the totes."

Photo(s)

1. [IMG-202308181508268262344621.jpg](#)
2. [IMG-202308181508338332206011.jpg](#)
3. [IMG-202308181508448442149612.jpg](#)
4. [IMG-2023081815125312532390853.jpg](#)
5. [IMG-202308181513001302513043.jpg](#)

SECTION III – RECORDS REVIEW**Record:** Inspections**AOC:** Yes**Ref #:** JJ1-RR-001**Reviewed By:** Jon Jones**Reviewed Date:** 08/18/2023

While inspecting the facility's weekly hazardous waste inspections, I saw there were two weeks in January 2021 that inspections were not conducted and two weeks in 2022 (June/July and December) that no weekly inspections were conducted. At the time of the inspection, no weekly hazardous waste inspections were conducted by the facility for the following weeks:

- January 3-9, 2021
- January 17-23, 2021
- June 26-July 2, 2022
- December 25-31, 2022

A copy of Work Order: PM481937 was obtained during the inspection for the weekly inspection that was to have taken place during the week of December 25-31, 2022. The work order was shown to have been dispatched to Mr. Dennis Johnson requiring an inspection for that week; however, in the comments section of the work order it states that, "PM not required this week plant not running. Aaron Sandoe 12/31/22." A copy of this work order is listed in the Section VII Appendix 2: Document Log.

Record: Contingency Plan/Quick Reference Guide**AOC:** Yes**Ref #:** JJ1-RR-002**Reviewed By:** Jon Jones**Reviewed Date:** 08/18/2023

We inspected the facility's Contingency Plan and found that the Emergency Coordinator information was not up to date, as the current Assistant Plant Manager (Mr. Newberry) was not listed in the plan. A copy of the Contingency Plan was included in the documents that Mr. Nelson sent to me following the inspection and is listed in the Section VII Appendix 2: Document Log.

We also asked Mr. Nelson for a copy of the facility's Quick Reference Guide to the plan. Mr. Nelson told us that they did not have a Quick Reference Guide.

After the inspection, Mr. Nelson sent me an email on 8/23/23 in which he provided the following information about both the Contingency Plan and Quick Reference Guide: "Contingency/Emergency Response Plan revisions – A Contingency plan Quick Reference guide was developed and is submitted for your review. And as discussed during the inspection, there have been a couple management changes since the last revision of our plan. Our environmental engineer is updating our plan, and once completed a revised copy (along with the new Quick Reference guide) will be submitted to Renton Regional Fire Authority as well as King County LEPC."

SECTION IV – AREA OF CONCERN

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

Building: Assembly Building	Area: Frame Floor	Sub-area:
JJ1-OB-001		
Five-gallon SAA step-can container for waste gloves that was not closed. Mr. Nelson closed the SAA step-can waste glove container during the inspection.	Regulation:	Sections:
Building: Assembly Building	Area: Frame Floor	Sub-area: SAA
JJ1-OB-002		
Facility is transferring waste from five-gallon SAA waste glove and waste solvent contaminated debris step-cans, accumulating waste throughout the facility, into 55-gallon SAA containers, that should be managed as accumulation containers, located in specific areas adjacent to each process. The 55-gallon containers were not marked with accumulation start dates and were not being inspected weekly.	Regulation:	Sections:
Building: Assembly Building	Area: Frame Floor	Sub-area:
JJ1-OB-003		
Five-gallon SAA step-can container for waste gloves that was not marked with a hazard/risk indicator.	Regulation:	Sections:

Building: Assembly Building	Area: Frame Floor	Sub-area:
JJ1-OB-004		
Emergency eye wash station was missing the bottle of eye wash.	Regulation:	Sections:
Building: Assembly Building	Area: North side of chassis prep booth	Sub-area: SAA
JJ1-OB-005		
55-gallon SAA container of waste liquid paint was not closed. Facility personnel closed the container during the inspection.	Regulation:	Sections:
Building: Assembly Building	Area: Startup	Sub-area:
JJ1-OB-006		
Five-gallon SAA for waste gloves was not closed. The step-can lid was bowed and did not make a complete seal with the container.	Regulation:	Sections:
Building: Assembly Building	Area: Startup	Sub-area: CAA
JJ1-OB-007		
55-gallon accumulation container of waste gloves, on the south side of chassis oven, was being mismanaged as a SAA container and was not marked with an accumulation start date.	Regulation:	Sections:
Building: Assembly Building	Area: Dock G	Sub-area:
JJ1-OB-008		
55-gallon used oil container was not closed.	Regulation:	Sections:
Building: Assembly Building	Area: Cab build line	Sub-area:
JJ1-OB-010		
Five-gallon SAA step-can container, that held waste shop towels, was not closed. The step can lid was not making a complete seal with the top of the container.	Regulation:	Sections:
Building: Assembly Building	Area: Sleeper build line	Sub-area: SAA

JJ1-OB-012

55-gallon SAA container of waste central vacuum system debris (CVSD) was not marked with a hazard/risk indicator.

Regulation:**Sections:****Building:** Assembly Building**Area:** Windshield Set**Sub-area:****JJ1-OB-013**

55-gallon accumulation container of waste solvent contaminated debris was being mismanaged as a SAA container. The container was not closed. Lid was not latched and did not make a complete seal with container. The container was also not marked with an ASD and was not being inspected weekly.

Regulation:**Sections:****Building:** Assembly Building**Area:** Windshield Set**Sub-area:****JJ1-OB-014**

Small brown trash receptacle that was labeled with the words "Hazardous Waste" and being used as a SAA container to accumulate waste solvent contaminated debris was not closed and not marked with a hazard/risk indicator.

Regulation:**Sections:****Building:** Assembly Building**Area:** Windshield Set**Sub-area:** SAA**JJ1-OB-015**

Five-gallon SAA step-can container of waste gloves, that was labeled as containing waste solvent contaminated debris, was not closed.

Regulation:**Sections:****Building:** Assembly Building**Area:** Cab Trim**Sub-area:** SAA**JJ1-OB-016**

Small black plastic trash receptacle (five-gallon) SAA container of waste solvent contaminated debris was not closed and not marked with a hazard/risk indicator.

Regulation:**Sections:****Building:** Assembly Building**Area:** West Cab Buck**Sub-area:**

JJ1-OB-017		
Waste solvent debris not containerized.	Citations:	Sections:
Building: Assembly Building	Area: Safety & Medical	Sub-area:
JJ1-OB-018		
SAA container of dual waste not marked with a hazard/risk indicator.	Regulation:	Sections:
Building: Assembly Building	Area: Sleeper Trim	Sub-area: SAA
JJ1-OB-020		
55-gallon SAA container of waste gloves was not closed.	Regulation:	Sections:
Building: Assembly Building	Area: Tool Room	Sub-area: SAA
JJ1-OB-021		
55-gallon accumulation container of waste gloves does not have an ASD and is not being inspected weekly.	Regulation:	Sections:
Building: Assembly Building	Area: Weld Booth	Sub-area:
JJ1-OB-022		
10-gallon yellow step-can held a pair of waste gloves and was not labeled with the words "Hazardous Waste" or marked with a hazard/risk indicator. Waste aerosol can was observed on cart and shop personnel verified that it was a waste aerosol. Waste aerosol was not labeled with the words "Hazardous Waste" or marked with a hazard/risk indicator and ASD. The waste aerosol was placed in a waste aerosol SAA container during the inspection.	Regulation:	Sections:
Building: Assembly Building	Area: Axle Weld Booth	Sub-area: Used oil storage
JJ1-OB-023		

55-gallon used oil container was not closed. The container had an attached funnel with a lid and the lid was not closed.	Regulation:	Sections:
55-gal SAA of waste welding dust not marked with a hazard/risk indicator.		
Building: Assembly Building	Area: Main Paint	Sub-area: Prime paint booth
JJ1-OB-024		
Five-gallon waste glove SAA step-can container was not marked with a hazard/risk indicator.	Regulation:	Sections:
Building: Assembly Building	Area: Main Paint	Sub-area: Sand-and-Repair booth
JJ1-OB-025		
Five-gallon SAA step-can container of waste gloves is not closed and is not marked with a hazard/risk indicator.	Regulation:	Sections:
Six-gallon SAA step-can container of waste shop towels is not marked with the words "Hazardous Waste" or a hazard/risk indicator.		
Building: Assembly Building	Area: Paint Mix Room	Sub-area: SAA
JJ1-OB-026		
55-gallon SAA container of waste liquid paint is not closed. Small bung plug was missing, and bung hole was open and not closed.	Regulation:	Sections:
Six-gallon SAA step-can container of waste gloves was not closed. Lid did not make a complete seal.		
Six-gallon SAA step-can container of waste shop towels was not closed. Lid did not make complete seal.		
Building: Assembly Building	Area: Central Vac	Sub-area: Outside, adjacent to building
JJ1-OB-027		

55-gallon SAA container has no hazard/risk indicator.	Regulation:	Sections:
Building: Assembly Building	Area: Touch up booth	Sub-area: Touch up booth day room
JJ1-OB-028		
55-gallon SAA container of waste liquid paint was not closed. The funnel on the container was not closed and the small bung was also not closed.	Regulation:	Sections:
Building: Building 2	Area: WWT Unit	Sub-area: SAA
JJ1-OB-029		
15-gallon SAA container labeled "Empty Aerosol Cans" was not closed, not labeled with the words "Hazardous Waste", and not marked with a hazard/risk indicator.	Regulation:	Sections:
Building: Building 2	Area: Waste Processing Area	Sub-area:
JJ1-OB-030		
A pallet with four, 55-gallon hazardous waste accumulation containers was straddling the containment drain and two of the four waste containers were situated between the drain and a roll up door and not actually within the area of containment.	Regulation:	Sections:
Building: Building 2	Area: Spent Lamp Recycling Area	Sub-area:
JJ1-OB-031		
A box of eight-foot waste fluorescent lamps, being managed as universal waste, had been in accumulation for greater than one year. The container was dated 7/5/22 and had been in accumulation for 409 days.	Regulation:	Sections:
Building: Building 2	Area: CAA	Sub-area:
JJ1-OB-032		
Three, 275-gallon waste totes of water contaminated with solvent,	Regulation:	Sections:

were not marked with hazard/risk indicators.		
--	--	--

Record: Inspections		
JJ1-RR-001		
No weekly hazardous waste inspections were conducted by the facility for the following weeks: - January 3-9, 2021 - January 17-23, 2021 - June 26-July 2, 2022 - December 25-31, 2022	Regulation:	Sections:

Record: Contingency Plan/Quick Reference Guide		
JJ1-RR-002		
Emergency Coordinator information was not up to date, as the current Assistant Plant Manager (Mr. Newberry) was not listed in the plan. Facility did not have a Contingency Plan-Quick Reference Guide. A guide was submitted for review with the facility's response to the areas of concern that were identified during the inspection.	Regulation:	Sections:

SECTION V – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

At the conclusion of the inspection, we conducted a closing conference that was attended by those listed in the Attendees table, in Section I of this report. We thanked Mr. Nelson for his time and cooperation during the inspection and began a review of the areas of concern (listed in Section III – Areas of Concern) that we observed during the inspection of the facility. We then explained the follow-up process that would take place once I finished the report. We explained he would receive a copy of the report as would a case officer. We told him the case officer would review the report to determine if any of my areas of concern documented violations.

SECTION VI – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS - No sampling was conducted.

SECTION VII – LIST OF APPENDICES

1. Photo Log

2. Document Log

APPENDIX 1: PHOTO LOG



[Title]			IMG-2023081810213021302323070.jpg
08/18/2023 10:21 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Frame Floor			47.49397089, -122.19872867
View of five-gallon SAA step-can with waste glove seen here preventing the lid from closing and making a complete seal with the container.			



[Title]			IMG-2023081810214021402345769.jpg
08/18/2023 10:21 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Frame Floor			47.49398525, -122.1986693
A close-up view of the same five-gallon SAA container, showing that the waste glove is preventing the lid from closing completely.			



[Title]			IMG-2023081810221722172154341.jpg
08/18/2023 10:22 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Frame Floor			47.49398241, -122.19867392
View (Blurry) of the five-gallon SAA step-can after being closed during the inspection.			



[Title]			IMG-2023081810222822282372063.jpg
08/18/2023 10:22 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Frame Floor			47.494106, -122.19852637
Another view of the five-gallon SAA step-can after being closed during the inspection.			



[Title]			IMG-2023081810295729572377348.jpg
08/18/2023 10:29 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Frame Floor			47.49393545, -122.19795838
View of an SAA with three 55-gallon SAA containers for waste aerosols, waste contaminated solvent debris, and waste gloves seen on the left. The containers for waste gloves and waste contaminated solvent debris were being mismanaged as SAA containers and should have been managed as accumulation containers.			



[Title]			IMG-202308181030083082495969.jpg
08/18/2023 10:30 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Frame Floor			47.49414745, -122.19791781
Close-up view of the 55-gallon accumulation container of waste gloves, in the SAA, seen here with no ASD. This container was being mismanaged as an SAA container.			



[Title]			IMG-2023081810302130212483284.jpg
08/18/2023 10:30 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Frame Floor			47.49397914, -122.19802105
Close-up view of the 55-gallon SAA container holding waste aerosols.			



[Title]			IMG-2023081810302730272547265.jpg
08/18/2023 10:30 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Frame Floor			47.49402687, -122.19807496
Close-up view of the 55-gallon accumulation container of waste solvent contaminated debris, in the SAA, seen here with no ASD. This container was being mismanaged as an SAA container.			



[Title]			IMG-2023081810362036202706370.jpg
08/18/2023 10:36 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Frame Floor			47.49382253, -122.19832412
View of black, five-gallon SAA step-can being used to accumulate waste gloves. The container is seen here with a bowed lid that will not close and no hazard/risk indicator.			



[Title]			IMG-2023081810362636262455438.jpg
08/18/2023 10:36 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Frame Floor			47.49382403, -122.19832286
Close-up view of the SAA step-can, showing the bowed lid and lack of hazard/risk indicator.			



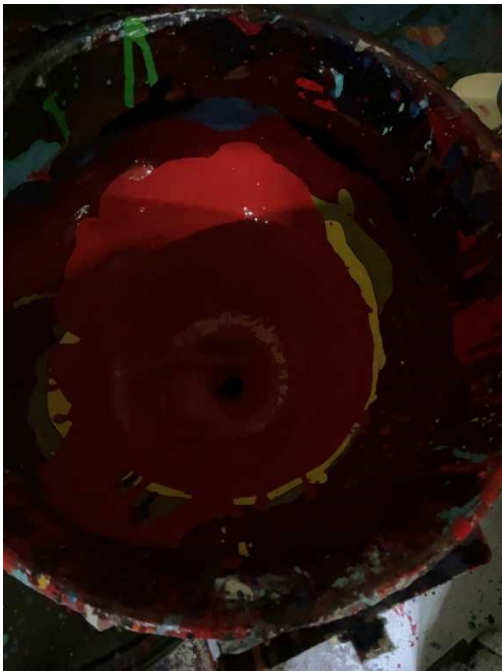
[Title]			IMG-2023081810363436342440540.jpg
08/18/2023 10:36 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Frame Floor			47.49386515, -122.19842792
Another close-up view of the backside of the SAA step-can, showing the bowed lid and lack of hazard/risk indicator.			



[Title]			IMG-2023081810405840582590014.jpg
08/18/2023 10:40 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Frame Floor			47.493898, -122.198422
View of emergency eye wash station, seen here missing the bottle of eye wash.			



[Title]			IMG-2023081810571457142155863.jpg
08/18/2023 10:57 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /North side of chassis prep booth			47.49387369, -122.1974344
View of 55-gallon SAA container of waste liquid paint that has the funnel lid open, showing that the container was not closed.			



[Title]			IMG-2023081810572957291988960.jpg
08/18/2023 10:57 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /North side of chassis prep booth			47.49393298, -122.19771863
Another view of the same 55-gallon SAA container of waste liquid paint, looking down into the funnel, showing that the container was not closed.			



[Title]			IMG-2023081810574057402110953.jpg
08/18/2023 10:57 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /North side of chassis prep booth			47.49387241, -122.19765971
Close-up view of the labeling on the 55-gallon SAA container of waste liquid paint that was not closed.			



[Title]			IMG-2023081810585258522181755.jpg
08/18/2023 10:58 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /North side of chassis prep booth			47.49388333, -122.19759042
View of 55-gallon SAA container of waste liquid paint after facility personnel closed the container.			



[Title]			IMG-202308181109589582492376.jpg
08/18/2023 11:09 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Startup			47.49390712, -122.19748788
View of five-gallon SAA for waste gloves that was not closed because the lid was bowed and did not make a complete seal with the container.			



[Title]			IMG-202308181110061062397778.jpg
08/18/2023 11:10 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Startup			47.49388667, -122.19748428
Close-up view of five-gallon SAA for waste gloves was not closed.			



[Title]			IMG-20230818112202222511799.jpg
08/18/2023 11:22 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Startup			47.49376849, -122.19728786
View of 55-gallon accumulation container of waste gloves, on the south side of chassis oven, that was being mismanaged as a SAA container and was not marked with an accumulation start date or being inspected weekly.			



[Title]			IMG-2023081811221222123029101.jpg
08/18/2023 11:22 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Startup			47.49376849, -122.19728786
Close-up view of 55-gallon accumulation container of waste gloves, on the south side of chassis oven, showing it is not marked with an accumulation start date.			



[Title]			IMG-2023081811221822182795700.jpg
08/18/2023 11:22 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Startup			47.49381501, -122.19712988
Another close-up view of the labeling on 55-gallon accumulation container of waste gloves, on the south side of chassis oven.			



[Title]			IMG-2023081811284528452868003.jpg
08/18/2023 11:28 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Dock G			47.49424424, -122.19690131
View of 55-gallon used oil collection container that is seen here as not being closed.			



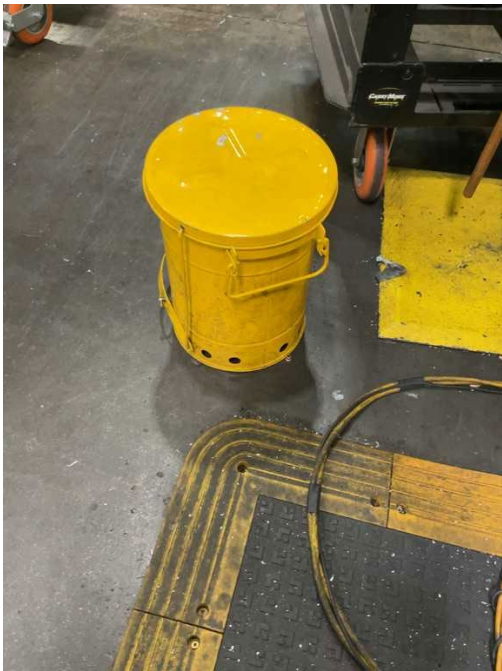
[Title]			IMG-2023081811285728572364549.jpg
08/18/2023 11:28 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Dock G			47.49429399, -122.19700125
Close-up view into the attached funnel, showing that it is not closed.			



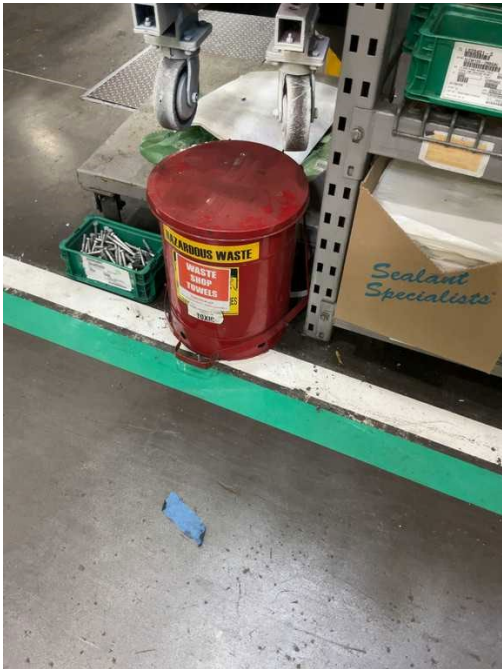
[Title]			IMG-2023081811391139112452947.jpg
08/18/2023 11:39 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building / Cab Build Line (Northside)			47.4934216, -122.19662924
View of a five-gallon step-can containing a WA State only waste, designated as "Special Waste," that was mislabeled as "Hazardous Waste."			



[Title]			IMG-2023081811392139212443622.jpg
08/18/2023 11:39 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building / Cab Build Line (Northside)			47.49343049, -122.19663871
Close-up view of a five-gallon step-can containing a WA State only waste, designated as “Special Waste,” that was mislabeled as “Hazardous Waste.”			



[Title]			IMG-2023081811395939592518461.jpg
08/18/2023 11:39 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building / Cab Build Line (Northside)			47.49342877, -122.19663309
View of the back of the five-gallon step-can containing a WA State only waste, designated as “Special Waste,” that was mislabeled as “Hazardous Waste.”			



[Title]			IMG-2023081811503450342827283.jpg
08/18/2023 11:50 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Cab build line (South side)			47.49336574, -122.19684273
View of five-gallon SAA step-can container, holding waste shop towels, that is not closed.			



[Title]			IMG-2023081811504150412530435.jpg
08/18/2023 11:50 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Cab build line (South side)			47.49334855, -122.19684759
Close-up view of five-gallon SAA step-can container, holding waste shop towels, that is not closed.			



[Title]			IMG-202308181159065962517106.jpg
08/18/2023 11:59 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Sleeper Build line			47.49308628, -122.19729577
View of another five-gallon step-can that contains WA State only waste that is being managed as “Special Waste.”			



[Title]			IMG-2023081811591659162383440.jpg
08/18/2023 11:59 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Sleeper Build line			47.49300435, -122.19727029
Close-up view of a five-gallon step-can containing a WA State only waste that is being managed as “Special Waste.”			



[Title]			IMG-2023081811592459242481487.jpg
08/18/2023 11:59 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Sleeper Build line			47.49312912, -122.19714992
Close-up view of WA State only waste that is being managed as “Special Waste.”			



[Title]			IMG-202308181203573572916199.jpg
08/18/2023 12:03 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Sleeper build line			47.49355584, -122.1969309
View of 55-gallon SAA container of waste central vacuum system debris (CVSD), seen here not marked with a hazard/risk indicator.			



[Title]			IMG-20230818120404442809167.jpg
08/18/2023 12:04 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Sleeper build line			47.49346004, -122.19686374
Close-up view of 55-gallon SAA container of waste central vacuum system debris (CVSD), seen here not marked with a hazard/risk indicator.			



[Title]			IMG-202308181224022422627685.jpg
08/18/2023 12:24 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Windshield Set			47.49396592, -122.1970485
View of 55-gallon SAA container of waste solvent contaminated debris that is not closed.			



[Title]			IMG-202308181224092492534715.jpg
08/18/2023 12:24 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Windshield Set			47.49397288, -122.19715168
Close-up view of 55-gallon SAA container of waste solvent contaminated debris showing that the lid is not fully closed.			



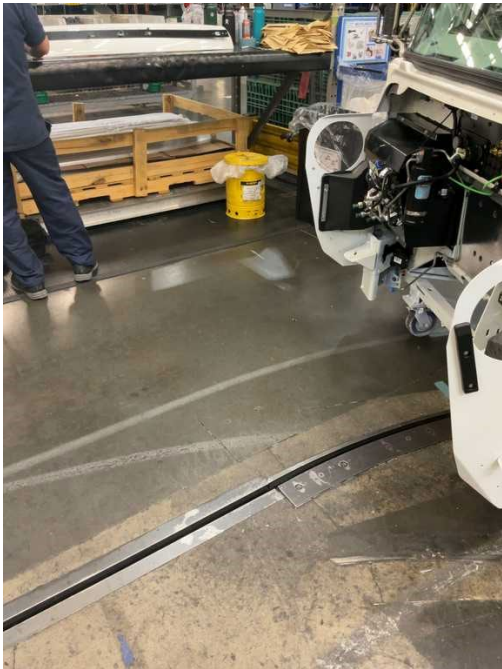
[Title]			IMG-2023081812281328132751506.jpg
08/18/2023 12:28 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Windshield Set			47.49372671, -122.19698448
View of small black plastic trash receptacle, seen here being used as a SAA container for waste solvent contaminated debris with no hazard/risk label and not closed.			



[Title]			IMG-2023081812282528252165140.jpg
08/18/2023 12:28 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Windshield Set			47.49370678, -122.1970133
Another view of small black plastic trash receptacle, seen here being used as a SAA container for waste solvent contaminated debris with no hazard/risk label and not closed.			



[Title]			IMG-2023081812283128312873725.jpg
08/18/2023 12:28 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Windshield Set			47.49367604, -122.19724237
Another view of small black plastic trash receptacle, seen here being used as a SAA container for waste solvent contaminated debris with no hazard/risk label and not closed.			



[Title]			IMG-2023081812333933392594340.jpg
08/18/2023 12:33 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Windshield Set			47.49375263, -122.19719639
View of yellow, SAA step-can for waste solvent contaminated debris, but containing waste gloves and not closed.			



[Title]			IMG-2023081812334633462510349.jpg
08/18/2023 12:33 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Windshield Set			47.49373967, -122.19704485
Close-up view of yellow, SAA step-can for waste solvent contaminated debris, but containing waste gloves, and not closed.			



[Title]			IMG-202308181234043442196221.jpg
08/18/2023 12:34 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Windshield Set			47.4937509, -122.19718728
View of waste gloves in yellow, SAA step-can for waste solvent contaminated debris.			



[Title]			IMG-2023081812383138312219400.jpg
08/18/2023 12:38 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Cab Trim			47.49371023, -122.19707584
View of Plastic open-top (no lid) garbage can, being used as SAA container for waste solvent contaminated debris, seen here not closed and not marked with a hazard/risk indicator.			



[Title]			IMG-2023081812383538352262473.jpg
08/18/2023 12:38 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Cab Trim			47.49370013, -122.19708069
View of waste solvent contaminated debris in plastic open-top (no lid) garbage can, being used as SAA container, seen here not closed and not marked with a hazard/risk indicator.			



[Title]			IMG-2023081812383938392236772.jpg
08/18/2023 12:38 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Cab Trim			47.49369997, -122.19708074
Another view of Plastic open-top (no lid) garbage can, being used as SAA container for waste solvent contaminated debris, seen here not closed and not marked with a hazard/risk indicator.			



[Title]			IMG-2023081812463846382371937.jpg
08/18/2023 12:46 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /West Cab Buck			47.49380772, -122.19746634
View of wooden popsicle sticks contaminated with hazardous waste sealant found stuck to the frame of the cab buck.			



[Title]			IMG-2023081812533453342228869.jpg
08/18/2023 12:53 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Safety & Medical			47.49378359, -122.1975641
View of the SAA container for dual waste, in the medical clinic, seen here with no hazard/risk indicator.			



[Title]			IMG-2023081812533953391993759.jpg
08/18/2023 12:53 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Safety & Medical			47.49378611, -122.19743335
Close-up view of the SAA container for dual waste, in the medical clinic, seen here with no hazard/risk indicator.			



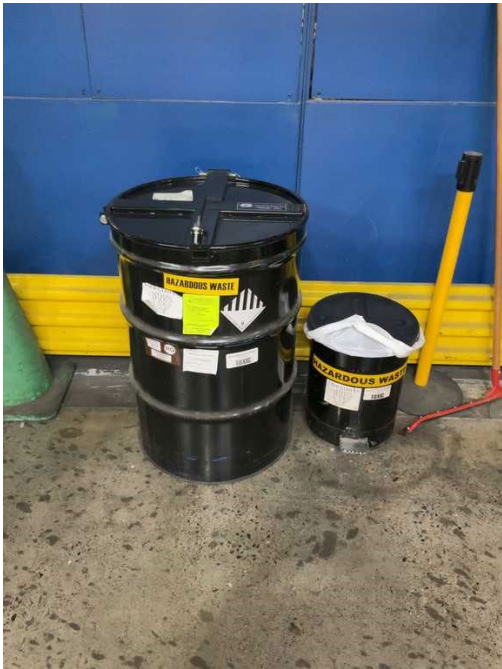
[Title]			IMG-202308181305115112705145.jpg
08/18/2023 01:05 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Tool room (Eastside)			47.49377014, -122.19849141
View of 55-gallon waste glove accumulation container, seen here without an ASD and not closed.			



[Title]			IMG-202308181305185182245098.jpg
08/18/2023 01:05 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building / Tool room (Eastside)			47.49379167, -122.1984577
Another view of 55-gallon waste glove accumulation container, seen here without an ASD and not closed.			



[Title]			IMG-202308181305265262532627.jpg
08/18/2023 01:05 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building / Tool room (Eastside)			47.49376684, -122.19849518
Another view of 55-gallon waste glove accumulation container, seen here without an ASD and not closed.			



[Title]			IMG-2023081813173317332964846.jpg
08/18/2023 01:17 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Tool Room			47.49418825, -122.19897877
View of 55-gallon waste glove accumulation container that is not marked with an ASD and not being inspected weekly.			



[Title]			IMG-2023081813173917393016644.jpg
08/18/2023 01:17 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Tool Room			47.49418825, -122.19897877
Close-up view of 55-gallon waste glove accumulation container that is not marked with an ASD and not being inspected weekly.			



[Title]			IMG-2023081813174517452701646.jpg
08/18/2023 01:17 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Tool Room			47.49382764, -122.19864638
Another close-up view of 55-gallon waste glove accumulation container that is not marked with an ASD and not being inspected weekly.			



[Title]			IMG-2023081813235823582641531.jpg
08/18/2023 01:23 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Weld Booth			47.49366328, -122.19882836
View of yellow five-gallon step-can that contains a pair of waste gloves.			



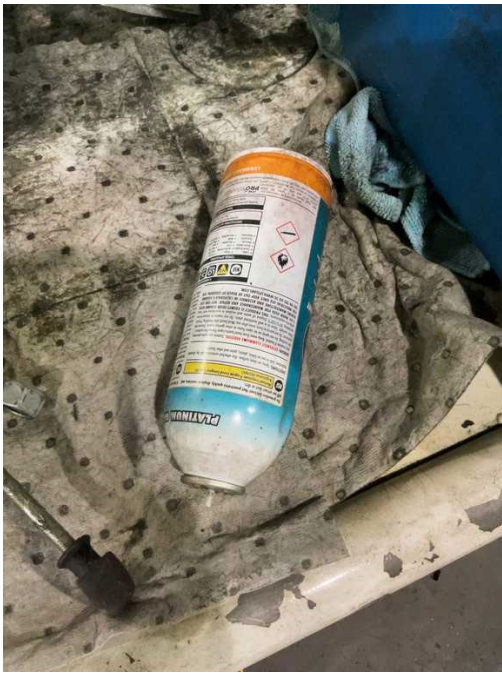
[Title]			IMG-202308181324052452736139.jpg
08/18/2023 01:24 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Weld Booth			47.49366953, -122.19881467
Close-up view of yellow five-gallon step-can that contains a pair of waste gloves and is seen here labeled as "Clean Rags.".			



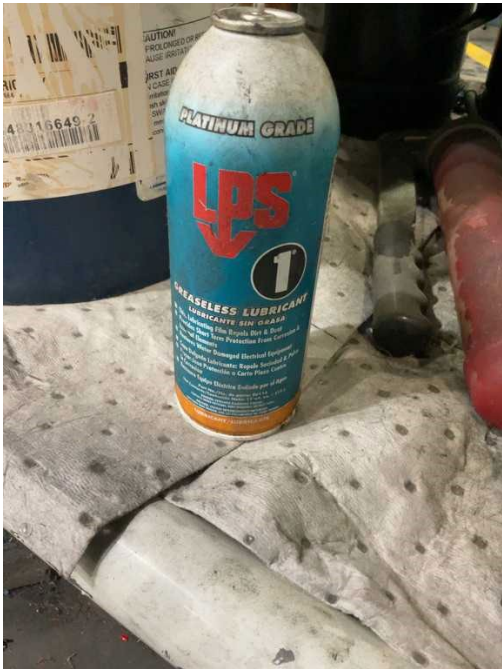
[Title]			IMG-2023081813241324132128525.jpg
08/18/2023 01:24 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Weld Booth			47.4939619, -122.19901196
View of waste gloves in yellow five-gallon step-can.			



[Title]			IMG-2023081813282428242591769.jpg
08/18/2023 01:28 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Weld Booth			47.49358555, -122.1992133
View of waste aerosol can.			



[Title]			IMG-2023081813283128313081343.jpg
08/18/2023 01:28 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Weld Booth			47.49360207, -122.19914674
Close-up view of waste aerosol can.			



[Title]			IMG-2023081813284728472670775.jpg
08/18/2023 01:28 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Weld Booth			47.49368949, -122.19905429
Another close-up view of waste aerosol can.			



[Title]			IMG-2023081813331233122334860.jpg
08/18/2023 01:33 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Axle Weld Booth			47.49396358, -122.19964672
View of used oil collection container, seen here not closed.			



[Title]			IMG-2023081813354235422534027.jpg
08/18/2023 01:35 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Axle Weld Booth			47.49334177, -122.19961085
View of 55-gallon container labeled “Hazardous Waste” for collection of particulates from dust collector equipment, seen here with no hazard/risk indicator.			



[Title]			IMG-2023081813355235522446192.jpg
08/18/2023 01:35 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Axle Weld Booth			47.49332374, -122.19970607
Another view of 55-gallon container labeled “Hazardous Waste” for collection of particulates from dust collector equipment, seen here with no hazard/risk indicator.			



[Title]			IMG-2023081813495149512453694.jpg
08/18/2023 01:49 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Main Paint/Prime paint booth			47.49343575, -122.19799904
View of SAA step-can (Black) for waste gloves, seen here without a hazard/risk indicator.			



[Title]			IMG-2023081813495649562334095.jpg
08/18/2023 01:49 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Main Paint/Prime paint booth			47.49348813, -122.1976607
Close-up view of SAA step-can (Black) for waste gloves, seen here without a hazard/risk indicator.			



[Title]			IMG-2023081813572157213300931.jpg
08/18/2023 01:57 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Main Paint/Sand-n-Repair paint booth			47.49355578, -122.19820296
View of SAA step-can (Black) for waste gloves, seen here without a hazard/risk indicator.			



[Title]			IMG-2023081813572757272843162.jpg
08/18/2023 01:57 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Main Paint/Sand-n-Repair paint booth			47.4936294, -122.19808289
Close-up view of SAA step-can (Black) for waste gloves, seen here without a hazard/risk indicator.			



[Title]			IMG-2023081813593459344019847.jpg
08/18/2023 01:59 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Main Paint/Sand-n-Repair paint booth			47.49347848, -122.19834016
View of SAA step-can (Red) for waste shop towels, seen here without “Hazardous Waste” and hazard/risk indicator labels.			



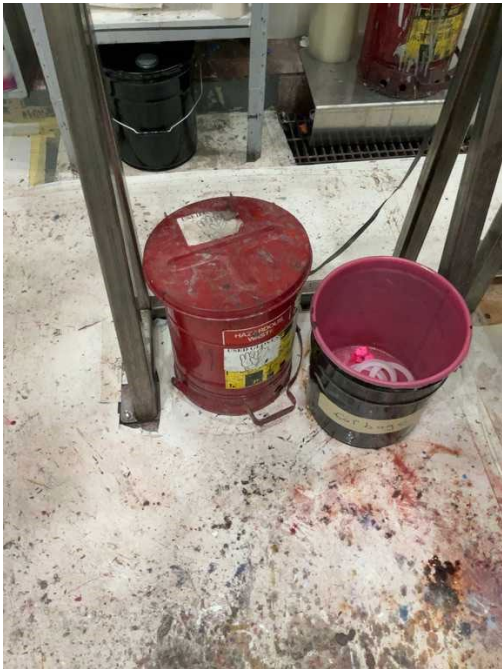
[Title]			IMG-2023081813594259424436592.jpg
08/18/2023 01:59 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Main Paint/Sand-n-Repair paint booth			47.49364622, -122.19844514
Another view of SAA step-can (Red) for waste shop towels, seen here without “Hazardous Waste” and hazard/risk indicator labels.			



[Title]			IMG-202308181410051052677016.jpg
08/18/2023 02:10 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Paint Mix Room			47.49332842, -122.19734009
View of 55-gallon SAA container for waste liquid paint, seen here not closed with small bung wide open.			



[Title]			IMG-2023081814101010102481850.jpg
08/18/2023 02:10 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Paint Mix Room			47.49350067, -122.19718444
Close-up view of 55-gallon SAA container for waste liquid paint, seen here not closed with small bung wide open.			



[Title]			IMG-2023081814114311432854408.jpg
08/18/2023 02:11 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Paint Mix Room			47.49352527, -122.19736735
View of SAA step-can (Red), for waste gloves, that is not closed.			



[Title]			IMG-2023081814115311532132169.jpg
08/18/2023 02:11 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Paint Mix Room			47.49336089, -122.19740665
Another view of SAA step-can (Red), for waste gloves, that is not closed.			



[Title]			IMG-202308181412021222594775.jpg
08/18/2023 02:12 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Paint Mix Room			47.49336465, -122.1974059
Another view of SAA step-can (Red), for waste gloves, that is not closed.			



[Title]			IMG-2023081814133913392409509.jpg
08/18/2023 02:13 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Paint Mix Room			47.49342673, -122.19730581
View of SAA step-can (Red), for waste solvent contaminated debris (shop towels), that is not closed.			



[Title]			IMG-2023081814135513552285549.jpg
08/18/2023 02:13 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Paint Mix Room			47.49342916, -122.19727232
Close-up view of SAA step-can (Red), for waste solvent contaminated debris (shop towels), that is not closed.			



[Title]			IMG-202308181423002303511107.jpg
08/18/2023 02:23 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Central Vac			47.49309835, -122.19725428
View of 55-gallon SAA container for waste particulate under cyclone separator, seen here missing a hazard/risk indicator.			



[Title]			IMG-2023081814231023104042312.jpg
08/18/2023 02:23 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Central Vac			47.49313176, -122.19725714
Another view of 55-gallon SAA container for waste particulate under cyclone separator, seen here missing a hazard/risk indicator.			



[Title]			IMG-2023081814231723172754167.jpg
08/18/2023 02:23 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Central Vac			47.49306667, -122.1972189
Close-up view of 55-gallon SAA container for waste particulate under cyclone separator, seen here missing a hazard/risk indicator.			



[Title]			IMG-2023081814323632362448237.jpg
08/18/2023 02:32 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Touch up booth			47.49307824, -122.19721178
View of 55-gallon SAA container for waste liquid paint, seen here not closed (both small bung and funnel open).			



[Title]			IMG-2023081814324232422534772.jpg
08/18/2023 02:32 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Touch up booth			47.49307702, -122.19719963
Close-up view of 55-gallon SAA container for waste liquid paint, seen here with funnel not closed.			



[Title]			IMG-2023081814325132512227627.jpg
08/18/2023 02:32 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Touch up booth			47.49307702, -122.19719946
Another close-up view of 55-gallon SAA container for waste liquid paint, seen here with small bung not closed, due to bung plug being mis threaded.			



[Title]			IMG-2023081814325832582527901.jpg
08/18/2023 02:32 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Touch up booth			47.49307702, -122.19719946
Close-up view of labeling on 55-gallon SAA container for waste liquid paint.			



[Title]			IMG-2023081814334133412485648.jpg
08/18/2023 02:33 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Assembly Building /Touch up booth			47.49307174, -122.1971946
Close-up view of 55-gallon SAA container for waste liquid paint, seen here after being closed.			



[Title]			IMG-2023081814394139412551366.jpg
08/18/2023 02:39 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Building 2/WWT Unit (main aisle)			47.49262367, -122.19840204
View of 20-gallon SAA container for waste aerosol cans, seen here not labeled with the words “Hazardous Waste,” a hazard/risk indicator, and not closed due to hole in lid.			



[Title]			IMG-2023081814394639462496240.jpg
08/18/2023 02:39 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Building 2/WWT Unit			47.49260086, -122.1985358
Close-up view of 20-gallon SAA container for waste aerosol cans, seen here not closed due to hole in lid.			



[Title]			IMG-2023081814395039502482439.jpg
08/18/2023 02:39 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Building 2/WWT Unit			47.49248614, -122.19722754
Close-up view of waste aerosol can in 20-gallon SAA container.			



[Title]			IMG-2023081814513551352274149.jpg
08/18/2023 02:51 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Building 2/Waste Processing Area			47.49262212, -122.19866125
View of pallet with four hazardous waste containers seen here with two of the four containers outside of the containment area.			



[Title]			IMG-2023081814515751572488144.jpg
08/18/2023 02:51 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Building 2/Waste Processing Area			47.49262285, -122.19861021
Another view of pallet with four hazardous waste containers seen here with two of the four containers outside of the containment area.			



[Title]			IMG-202308181452075272223924.jpg
08/18/2023 02:52 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Building 2/Waste Processing Area			47.49243217, -122.19868874
Another view of pallet with four hazardous waste containers seen here with two of the four containers outside of the containment area.			



[Title]			IMG-202308181500450452628432.jpg
08/18/2023 03:00 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Building 2/Spent Lamp Recycling Area			47.49263011, -122.1987808
View of the eight-foot box of universal waste fluorescent lamps that has been in accumulation for greater than 1 year.			



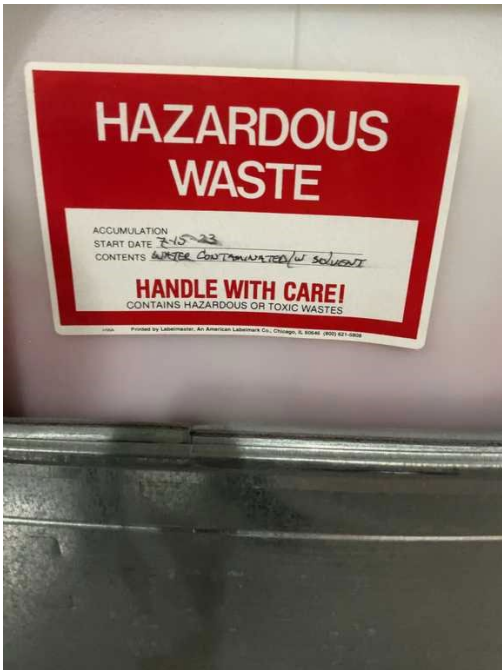
[Title]			IMG-202308181500530532803378.jpg
08/18/2023 03:00 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Building 2/Spent Lamp Recycling Area			47.49270503, -122.19904947
Close-up view of the label on the eight-foot box of waste lamps with a date of 7/5/22, showing that the waste lamps have been in accumulation for greater than a year.			



[Title]			IMG-202308181508268262344621.jpg
08/18/2023 03:08 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Building 2/Waste Processing Area			47.49261666, -122.19915676
View of two of the three 275-gallon waste totes seen here with no hazard/risk indicators.			



[Title]			IMG-202308181508338332206011.jpg
08/18/2023 03:08 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Building 2/Waste Processing Area			47.49261754, -122.19913568
View of third 275-gallon waste tote, seen here with no hazard/risk indicator.			



[Title]			IMG-202308181508448442149612.jpg
08/18/2023 03:08 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Building 2/Waste Processing Area			47.49261883, -122.19908557
Close-up view of the labeling on 275-gallon waste tote.			



[Title]			IMG-2023081815125312532390853.jpg
08/18/2023 03:12 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Building 2/Waste Processing Area			47.49261833, -122.19907013
View of two of the three 275-gallon waste totes seen here after being labeled with the hazard/risk indicator.			



[Title]			IMG-202308181513001302513043.jpg
08/18/2023 03:13 PM (PT)	No CBI	No PII	Photographer: Jon Jones
Building 2/Waste Processing Area			47.49261823, -122.19918488
View of the third 275-gallon waste tote seen here after being labeled with the hazard/risk indicator.			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Contingency Plan	Hazardous Waste Contingency Plan Quick Reference Guide.pdf	No	No	Jon Jones	12/11/2023
Contingency Plan	Kenworth Renton Emergency Response Plan.pdf	No	No	Jon Jones	12/11/2023
Other - Leather glove purchasing information	Kenworth Truck Renton - Glove Purchases 2020-2023.pdf	No	No	Jon Jones	12/11/2023
Weekly Inspections	2020 Sept-Oct-Nov- Dec Weekly Inspection PM.pdf	No	No	Jon Jones	12/11/2023
Weekly Inspections	20221231 Weekly Haz Waste Inspection.pdf	No	No	Jon Jones	12/11/2023
Weekly Inspections	Completed_PM0002 SEPT DEC 2020.xlsx	No	No	Jon Jones	12/11/2023
Weekly Inspections	Completed_PM0002_2021.xlsx	No	No	Jon Jones	12/11/2023
Other - Drum Tracking	Clean Earth Drum Tracking.pdf	No	No	Jon Jones	12/11/2023
Other - Drum Tracking	Clean Harbors Drum Tracking.pdf	No	No	Jon Jones	12/11/2023
Other - Areas of concern addressed by facility	2023 EPA Inspection Areas of Concern.xlsx	No	No	Jon Jones	12/11/2023
Weekly Inspections	2021 Weekly Inspection PM.pdf	No	No	Jon Jones	12/11/2023
Weekly Inspections	2021 Weekly Inspection PM2.pdf	No	No	Jon Jones	12/11/2023
Weekly Inspections	2021 Weekly Inspection PM3.pdf	No	No	Jon Jones	12/11/2023
Weekly Inspections	2021 Weekly Inspection PM4.pdf	No	No	Jon Jones	12/11/2023
Communications	FW Kenworth Truck Renton - 8182023 EPA Inspection Follow-up.msg	No	No	Jon Jones	12/11/2023
Maps/Drawings	Bulk Oil Storage Container Location Map	No	No	Jon Jones	8/18/23
Maps/Drawings	Drum Location Map	No	No	Jon Jones	8/18/23