

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

AT

U.S. DEPARTMENT OF ENERGY KANSAS CITY NATIONAL SECURITY CAMPUS (USDOE – KCNSC)

14520 Botts Road
Kansas City, Missouri 64147
(816) 488-3417
EPA ID Number: MOR000545376

ON

August 17 - 19, 2022

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Enforcement and Compliance Assurance Division

1.0 INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division/Chemical Branch/RCRA Section (ECAD/CB/RCRA) of the U.S. Environmental Protection Agency (EPA) Region 7, I conducted a compliance evaluation inspection (CEI) at the U.S. Department of Energy (USDOE), National Nuclear Security Administration (NNSA) - Kansas City National Security Campus (KCNSC) located in Kansas City, Missouri, on August 17 - 19, 2022. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act, as amended. During the CEI, I collected information and data necessary to determine compliance with the applicable regulatory and statutory requirements. This report and attachments present the results of the inspection. Based on information obtained prior to and during the inspection, I inspected the site as a Large Quantity Generator (LQG) of Hazardous Waste, a Small Quantity Handler of Universal Waste, and a Generator of Used Oil. The facility was last inspected for RCRA compliance by Region 7 of the Environmental Protection Agency (EPA) on February 17 – 20, 2015.

2.0 PARTICIPANTS

USDOE, NNSA - KCNSC: (KCNSC)

Sybil Chandler, Environmental Health & Safety (EH&S) Manager - USDOE, NNSA – KCNSC
Kevin Allgeyer, Health, Safety & Environmental (HS&E) Manager - Honeywell
Bridget Langle, HS&E Engineer II - Honeywell

Kelly Grant, Principal Waste Management Engineer – Honeywell
Nicole Opela, HS&E Manager - Honeywell
Vern Wolters, Chief Facility Engineer – CenterPoint Zimmer
Douglas Putthoff, Senior Industrial Hygienist, Quality & Regulatory Systems – MRI Global
Bob Beauchamp, Senior Lead Waste Management Engineer - Honeywell
Tony Brown, Senior Environmental Compliance Engineer – Honeywell
Bill Wright, Senior Environmental Compliance Engineer – Honeywell
Jason Boswell, Senior Environmental Compliance Engineer – Honeywell
Jeremy Holthaus, Technical Manager – Honeywell (exit briefing only)
Tom Moibi, Director of HS&E and Emergency Management – Honeywell (exit briefing only)
Chris Gillihan, Office of Mission Assurance Assistant Manager - USDOE, NNSA – KCNSC
Jessy Innocent, - USDOE, NNSA – KCNSC (via phone - exit briefing only)
Bert Gawthrop, Legal Counsel – Honeywell (via phone - exit briefing only)
Irvin Gray, Legal Counsel – Honeywell (via phone - exit briefing only)
Magan Thurman, Materials Manager – Honeywell (via phone - exit briefing only)
Ray Wilkins, Chief Engineer/Supervisor - U.S. Engineering
Tim Verhulst, Maintenance - U.S. Engineering
Bob Hughes, Project Manager – Jacobs Engineering
Vickey Valdez, Senior Technologist - Honeywell
Linda Yearington, Assembler Special Projects – Honeywell
David Smith, Integrated Supply Chain (ISC) Senior Supervisor – Honeywell
Travis Drennon, ISC Supervisor (Plating) – Honeywell

U.S. Environmental Protection Agency: (EPA)
Trevor L. Urban, Environmental Scientist

3.0 INSPECTION PROCEDURES

Prior to the CEI, I conducted a drive-by inspection of the site. I did not observe any potential areas of concern. Upon arriving unannounced at the facility (10:00 a.m.), I checked in at the security desk located in the visitor lobby of the administration building (building 1) and asked to speak with Ms. Sybil Chandler and with the environmental compliance personnel. I presented my credentials and explained both the purpose of the inspection and the procedures I would follow to security personnel. The security personnel contacted the environmental compliance personnel. Additional security personnel then met with me and required me to provide them with identification to verify who I was, and that I was the actual person in their security clearance system. I provided them with my credentials and government ID badge. They then reviewed my security clearance to make sure it was current and that I had clearance to access the facility prior to providing me with a security clearance identification badge. Mr. Kelly Grant and Ms. Bridget Langle met me at the security desk, and I presented my credentials and explained both the purpose of the inspection, and the procedures I would follow. Mr. Grant and Ms. Langle contacted the appropriate personnel that I would need to speak with to perform the inspection and waited for me to obtain my security clearance identification badge for the inspection. I obtained my security clearance identification badge approximately one hour later and then Mr.

Grant and Ms. Langle escorted me to a conference room located inside the facility administration building where we were joined by Ms. Sybil Chandler, Ms. Nicole Opela, Mr. Kevin Allgeyer and Mr. Vern Wolters and I began the entry briefing.

I presented my credentials and explained the purpose of the inspection and the procedures I would follow during the inspection to Ms. Chandler, Ms. Langle, Ms. Opela, Mr. Allgeyer, Mr. Gant, and Mr. Wolters. I then presented a copy of RCRA Section 3007(a), which contains EPA's 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. I then presented them with a copy of the *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections* and reviewed KCNSC's confidentiality rights. I informed them I would provide a Confidentiality Notice at the end of this inspection. The inspection consisted of a discussion of facility operations, waste generation and waste management practices, a review of waste management records, and a visual inspection of the waste generation and management areas. Ms. Chandler stated that she is the EH&S Manager at KCNSC and works for NNSA. Ms. Chandler stated she replaced Mr. Andy Gibler, who retired. Mr. Allgeyer stated he was the HS&E Manager and worked for Honeywell. Ms. Langle and Ms. Opela stated that they both worked for Honeywell in the HS&E department. Mr. Gant stated that he is the Principal Waste Management Engineer for Honeywell and manages hazardous wastes generated at the facility with Mr. Bob Beauchamp. Mr. Wolters stated that he was the Chief Facility Engineer for CenterPoint Zimmer and that he manages the physical building systems (shell and core) operations and maintenance activities at KCNSC.

Ms. Chandler acted as the official facility representative during the inspection and accompanied me during the visual inspect along with multiple Honeywell HS&E, Environmental Compliance and Waste Management personnel. Mr. Bob Beauchamp accompanied me during the entire visual inspection of KCNSC with the exception of building 1. Ms. Langle and Opela, and Messrs. Gant, Brown and Wright also accompanied me during most of the visual inspection. The inspection consisted of a discussion of facility operations, waste generation and waste management practices, a review of waste management records, and a visual inspection of the waste generation and management areas for buildings 2 – 7. Building 1 is utilized for administration offices only and no production waste is generated other than office waste such as universal waste lamps and batteries. Ms. Vickey Valdez and Linda Yearington and Messrs. Vern Wolters, Douglas Putthoff, Ray Wilkins, Tim Verhulst, Bob Hughes, Jason Boswell, David Smith, and Travis Drennon provided operational information when I inspected their respective facility/production areas.

I conducted informal status report-out meetings with the facility representatives that were present at the end of each day on 8/17/2022 and 8/18/2022 and I also made arrival time arrangements and requested records to be reviewed for the next corresponding day.

The CEI was conducted over portions of three days. On August 17-18, 2022, the entry briefing, discussion of waste streams, discussion of compliance information, and the facility visual inspection occurred. I also began reviewing documents and records. On the morning of August

19, 2022, I completed my review of requested documents and records and performed an exit briefing. I completed my inspection and summarized the findings and recommendations with Mr. Chris Gillihan who acted as the facility representative for Ms. Chandler who could not attend the exit briefing. Also present at the exit briefing was Mses. Langle and Opela, and Messrs. Beauchamp, Gant, Holthans, and Moibi. Ms. Thurman, and Messrs. Innocent, Gawthrop, Gray, Allgeyer and Wright attended the exit briefing via the phone. See attachment 3 for the entry/exit briefing and meeting attendance log. I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.01D), unless noted differently.

At the conclusion of the inspection, during the exit briefing, I provided Mr. Gillihan with a Confidentiality Notice and Receipt for Documents and Samples which he signed as acknowledgement of receipt (attachments 1 and 2 respectively). No confidentiality claims were made by KCNSC. No findings were observed at the time of the inspection. Therefore, a Notice of Preliminary Findings (NOPF) was not left with KCNSC. No photographs were taken during the inspection. See attachment 4 for the facility photo/map.

4.0 FACILITY DESCRIPTION

4.1 Facility Information and Operations

The KCNSC is located at 14520 Botts Road, about sixteen miles south of the downtown area, and about eight miles south of the old Kansas City Plant at the Bannister Federal Complex located at the intersection of Troost Avenue and 95th Street. The old Kansas City Plant located at the Banister Complex was in the process of being shut down during the 2015 inspection. The KCNSC is a government owned contractor-operated facility. The facility began operation in 2013. The KCNSC facility is operated by Honeywell Federal Manufacturing & Technologies (FM&T). The facility is engaged in the production of non-nuclear components for nuclear weapons. The facility currently operates three shifts per day. The first shift is the main production shift, and the second and third shifts have minimal staff. Security is provided 24 hours per day, 365 days per year. At the site, there are approximately 43 federal NNSA employees, and approximately 6,300 Honeywell employees. The KCNSC consists of approximately 160 acres with seven buildings totaling approximately 1.5 million square feet under roof (see attachment 4 for facility photo/map). Building 1 is used only for administration office space and no production occurs in building 1. Buildings 2 and 3 are utilized primarily for production but also have some office space built into each production area. Building 4 is 25% office space and 75% production area. Building 5 has a building maintenance/facility groundskeeping area and provides heating and cooling for the facility campus. Building 5 also houses a water purification system and the industrial wastewater pretreatment facility (IWPF). Building 6 is an open building with individual pods/structures for storing chemical products. Building 7 is also an open building and is utilized for a recycling area and for storing waste management equipment and supplies such as empty containers.

Honeywell manages the KCNSC facility production and process operations that supports the U.S. Department of Energy's NNSA. The U.S. General Services Administration, acting as the

Federal government's broker, signed a lease agreement with CenterPoint Zimmer, LLC, for the 1.5 million square foot KCNSC in June 2010. Construction of the facility was completed late 2012. The move from the old Bannister Federal Complex began in January 2013 and was finished in July 2014. Mr. Wolters stated CenterPoint Zimmer, LLC, developed the property, built the buildings, and operates the physical building systems (shell and core) at the KCNSC facility.

Mr. Wolters stated CenterPoint Zimmer, LLC, utilizes contractors to perform physical building systems (shell and core) maintenance activities such as US Engineering Company for heating and cooling, RF Fisher for the electrical systems including main lighting, and Diversified Maintenance, Incorporated (DMI) for general housekeeping and janitorial cleaning activities. The outside facility grounds maintenance is also managed by CenterPoint Zimmer, LLC, via contractors. This system of management was also observed during the February 17 – 20, 2015 inspection. Mr. Wolters who works for CenterPoint Zimmer, LLC, informed me that he still considers CenterPoint Zimmer, LLC to be a separate company and operation from the Honeywell operation. Mr., Wolters stated CenterPoint Zimmer, LLC generates no hazardous waste and considers themselves to be a non-generator of hazardous waste, a small quantity handler of universal wastes (lamps and batteries) and a generator of used oil. Mr. Wolters provided me with a portion of the lease agreement and a waste stream survey for universal waste batteries and lamps as well as a bill of lading for universal waste batteries and lamps shipped on 7/26/22 (attachment 5). Mr. Wolters stated Centerpoint Zimmer has a contract with MRI Global and utilizes Mr. Putthoff to perform their specific environmental compliance activities. I informed Mses. Chandler, Langle and Opela and Messrs. Beauchamp, Gant, Boswell, Brown, Wright, Wolters, and Putthoff, that I consider the facility to be one operation at one contiguous location and not two separate facilities for the purpose of the RCRA inspection since the facility was built specifically for the USDOE-NNSA operations and that Honeywell controls all access to KCNSC.

4.2 RCRA Status

KCNSC last notified on August 14, 2020, as an LQG of characteristic and listed hazardous wastes (see attachment 6). Mr. Beauchamp provided me with a copy of the hazardous & non-hazardous manifest shipment summary from October of 2019 – August of 2022. The summary lists all the wastes generated and shipped off-site for the past three years of operation (see attachment 7). A review of their current generation rates indicates that KCNSC has been and is currently an LQG (greater than 1000 kg/month) of RCRA hazardous waste. Mr. Bob Beauchamp stated he is the Lead Waste Management Engineer for Honeywell and manages hazardous wastes generated at the facility. Mr. Beauchamp stated the facility continues to maintain a complete list of waste profiles for the facility, which lists all hazardous and non-hazardous waste streams generated at the facility and their respective waste codes and disposition. This list was included in the February 2015 CEI documents. Based on the past and current generation rates of known hazardous waste, I determined KCNSC to be an LQG of characteristic and listed hazardous wastes, as well as a small quantity handler of universal waste, and a generator of used oil, at the time of the inspection.

4.3 Facility Wastes

KCNSC generates a large variety of hazardous and non-hazardous wastes and ships hazardous waste on a weekly and sometimes daily basis. The information below pertains to wastes observed during the inspection and does not include all the wastes generated at the facility. The information below was also obtained from hazardous waste shipment records and statements made during the inspection. The following buildings and areas/departments were visually inspected: building 1 – basement only, building 2 – all areas with the exception of the sigma 15 and PM100 clean room departments, building 3 – all areas, building 4 – shipping and receiving area, AEF department and machining department, building 5 – all areas, building 6 – all areas, and building 7 – all areas.

Laboratory Waste - Laboratory waste is generated throughout the facility. Mr. Beauchamp explained that in the past, at the old facility, most laboratory waste was sent to the industrial wastewater pretreatment facility (IWPF) for treatment and then discharged to the Kansas City, Missouri, sanitary sewer via a permit. However, Mr. Beauchamp stated that the KCNSC IWPF can no longer process these types of wastes and can only accept rinse water and minimal amounts of process wastewater with no heavy metals and only rinse water with a pH in the range between 3 and 11. Mr. Beauchamp stated that the laboratory waste is now accumulated in satellite accumulation containers near their points of generation as identified on their waste profile. Mr. Beauchamp stated that the facility operates utilizing the State of Missouri's satellite accumulation container standards. The satellite accumulation containers are tracked by the waste management department to ensure that no satellite accumulation container exceeds the one-year time limit. The satellite accumulation containers varied in size, from 10-ml vials to 55-gallon containers. The satellite accumulation containers are labeled using a waste acceptance certification (WAC) label, are identified as to their contents, and dated with an accumulation start date. Once full, the laboratory department contacts the waste management department and requests a new container. The waste management department sends out a Chemical Material Handler to inspect the container of waste for RCRA compliance and to transport the hazardous waste container to the waste management department weigh-in area. Once the container is weighed and logged into the tracking system, the waste is transferred to the area identified on its WAC (i.e., hazardous waste repack area, the rinse room, the precious metals room, or a less than 90-day hazardous waste accumulation area which consists of a hazardous waste room with containment and a solid waste room). During the visual inspection, I observed waste being accumulated in the laboratories located in buildings 2 & 3. Ms. Vickey Valdez, Senior Technologist for laboratories located in building 2 escorted me as well as Mses. Chandler and Langle and Messrs. Beauchamp, Gant, Boswell, and Brown during this portion of the visual inspection. I observed several containers accumulating hazardous waste throughout the laboratories and the containers were in good condition, closed, labeled as hazardous waste, and dated with accumulation start dates. No apparent areas of RCRA non-compliance were noted.

Surface Coating Waste – Surface coating waste (plating waste) is managed similarly to the laboratory waste. KCNSC has several surface coating operations throughout the facility. Wastes

generated in the surface coating operations are collected in containers and only rinse water with no heavy metals and with a pH in the range between 3 and 11, are hard piped to the IWPf for treatment/disposal. During the visual inspection, I observed several surface coating operations and the method of collection/management of hazardous wastes generated in the areas. The waste streams most often generated in the area are corrosives and heavy metal bearing wastes. The corrosives (both acids and caustics) and heavy metal bearing wastes are all collected in containers. Mr. Beauchamp stated only rinse water is allowed to go the IWPf via the hard pipe system and that there is a sump located outside the area that is continuously monitored to ensure no process wastewater exceeding the pH parameters reach the IWPf. Mr. Beauchamp also stated there are sealed sumps located in the areas below the surface coating tanks to contain any spills from the surface coating operation in the event of a spill. During the visual inspection, I also observed solder on the floor in and around the hot air solder level (HASL) machine. I spoke with Mr. Travis Drennon, ISC Supervisor, and he stated the machine was in the process of being cleaned by maintenance and that they were supposed to clean the up the spilled solder from the floor and place it into the recycling container located next to the HASL machine. Mr. Drennon stated that the spilled solder consisted of lead, silver, and gold and that it was managed as a recyclable metal. I informed Mr. Drennon that the spilled solder generated from the maintenance of the HASL machine must be managed immediately and not left on the floor. Mr. Drennon stated that he contacted the maintenance department, and it was scheduled to be completed that day. Mr. Drennon then instructed his employees to clean up the spilled solder when I was present and placed it into the satellite accumulation container for recycling. I observed no other apparent concerns or areas of RCRA non-compliance in the surface coating areas.

Oily Rag/Solvent Contaminated Wipes Waste – Mr. Puttoff from MRI Global was present on the August 17, 2022, and also accompanied me during the visual inspection of the physical building systems (shell and core) maintenance areas for KCNSC to include buildings 2 and 5, and the basement of building 1. As stated above, building 5 has a building maintenance/facility groundskeeping area and provides heating and cooling for KCNSC. I observed a 30-gallon container labeled as oily rags. The 30-gallon container was closed and had no other markings. The maintenance area in building 5, is operated by US Engineering personnel. Mr. Wilkins is the Chief Engineer for US Engineering and stated that he had been working at the facility since it opened in 2013. Mr. Wilkins stated the rags are used throughout the facility to clean up oil drips and spills while performing maintenance activities. I asked Mr. Wilkins if any cleaning solvents are used at the facility, and he said “Yes”. I then asked Mr. Wilkins how the solvent contaminated rags are managed at the facility, and he stated that the rags would be added to the 30-gallon container and managed with the oily rags. I asked Mr. Wilkins if the oily rags or solvent contaminated rags are hazardous, and he said “No”. Mr. Wilkins stated the oily rags would have oil on them and the solvent contaminated rags were mostly dry and not considered hazardous. Mr. Wilkins removed the lid from the 30-gallon container, and I observed less than five oily rags at the bottom of the container and no free liquids. Mr. Wilkins stated that solvent contaminated rags are rarely generated from maintenance activities. I informed Messrs. Wilkins, Puttoff, Beauchamp, Gant, Wright, and Brown, and Ms. Chandler and Langle that solvent contaminated wipes generated at the facility may be a hazardous waste depending on the types of solvents involved with maintenance activities and must be thoroughly evaluated when generated.

Mr. Puttoff stated that the solvents currently used when maintenance is performed at the facility should not be ignitable and that he would double check to make sure that none are toxic or possibly listed solvents when used. I provided them with compliance assistance and suggested that the solvent contaminated wipes be managed as “Excluded Solvent Contaminated Wipes” to ensure the physical building systems (shell and core) maintenance activities do not generate hazardous waste that would need to be managed along with the KCNSC LQG waste. I observed no other apparent concerns or areas of RCRA non-compliance.

IWPF Waste - IWPF sludge waste is generated from the treatment of rinse waters generated from various operations throughout the facility. The IWPF is located in building 5 and is managed by Jacobs Engineering. Ms. Opela provided me with a copy of the IWPF wastewater discharge permit dated 1/13/2018 – 1/12/2023 (attachment 8). Ms. Opela stated that the permit is currently being renewed. Mr. Bob Hughes is the Project Manager and stated that any waste generated in the IWPF (i.e., spent filters and filter press solids) are managed in the same manner as all other wastes throughout the facility, utilizing the waste profiles and WACs. Mr. Beauchamp stated that in the past, the filter press solids were disposed as a F006 hazardous waste. However, Mr. Beauchamp stated that the filter press solids are currently being recycled for copper and silver content and are an exempted waste. There were no filters or filter press solids being accumulated in the IWPF area at the time of the inspection and I did not observe any apparent areas of RCRA non-compliance were noted.

Spent Fluorescent Lamps – KCNSC collects spent fluorescent lamps and manages them as universal wastes. During the visual inspection, I observed spent lamps being collected in building 2, in the maintenance area for KCNSC. The containers were closed, labeled as universal waste lamps, and dated. Mr. Beauchamp stated when the containers are full, they will be taken to the waste management department located at the north end of building 2 and shipped off-site as universal waste. I also observed spent fluorescent lamps being collected in building 2, in the electrical contractor area Q, room #2Q.001. The electrical contractor area is operated by RF Fisher personnel. Mr. Puttoff stated that CenterPoint Zimmer, LLC was in charge of the area. I observed one four-foot box with spent lamps being collected. The 4-foot boxed the spent fluorescent lamps was closed, labeled as universal waste lamps, and dated 8/9/22. I also observed a 12-inch square box of metal halide bulbs being accumulate as well as a 2.5-gallon bucket of batteries. The containers were both closed, labeled as universal waste lamps/batteries, and dated 5/13/22 and 7/12/22 respectively. I also observed universal waste lamps and batteries being accumulated in the basement building 1. Mr. Verhulst who works for U.S. Engineering and performs CenterPoint Zimmer maintenance activities manages the universal waste lamps and batteries. The containers were closed, labeled as universal waste lamps/batteries, and dated. I observed no apparent issues or violations. Mr. Wolters provided me with most current spent fluorescent lamp shipping bill of lading from Heritage Environment for CenterPoint Zimmer dated 7/26/22 (attachment 5).

4.4 Other Regulatory Requirements

Manifests - Mr. Beauchamp provided me with a copy of the hazardous & non-hazardous

manifest shipment summary (220 total) from October of 2019 – August of 2022. The summary lists all the wastes generated and shipped off-site for the past three years of operation (see attachment 7). I reviewed a total of 203 hazardous waste shipping manifests, and I observed no apparent violations. I took copies of the manifests for the last four most recent shipments of hazardous waste as examples of wastes being shipped. See attachment 9 for manifest #023874099 JJK and LDR, and #023874100 JJK, dated 08/18/2022, #023874094 JJK, dated 07/21/2022, #023874096 JJK, dated 07/28/2022, #023874098 JJK, dated 08/11/2022.

Less-Than 90-Day Accumulation Areas – As stated above, the waste management department sends out Chemical Material Handlers to inspect the containers of waste for RCRA compliance and to transport the hazardous waste containers to the waste management department weigh-in area. Once the container is weighed and logged into the tracking system by a Waste Management Engineer, the waste is transferred to the area identified on its WAC (i.e., hazardous waste repack area, the rinse room, the precious metals room, or a less-than 90-day hazardous waste accumulation area which consists of a hazardous waste room with containment and a solid waste room). Mr. Beauchamp stated he and Mr. Gant, and their colleagues can pull daily and weekly printouts that identify all wastes being stored on site including satellite accumulation containers which are approaching their one-year limit. The tracking system ensures that no hazardous waste in the accumulation areas exceeds the less-than 90-day accumulation limit as well as the annual satellite accumulation limit. Mr. Beauchamp provided me with a printout for all waste currently being stored in the less-than 90-day hazardous waste accumulation area (see attachment 10). I observed all the waste management less-than 90-day hazardous waste accumulation areas and noted no apparent violations. I also observed building 6 where chemical products are stored as well as building 7 where recycling activities occur and empty containers are stored, and no apparent areas of RCRA non-compliance were noted.

I asked Mr. Beauchamp if the hazardous waste accumulation areas were inspected, and he stated that the hazardous waste accumulation areas were inspected at least weekly. Mr. Beauchamp provided me with the inspection records for the hazardous waste accumulation areas which included the emergency spill equipment inspections from October 2019 through August of 2015. I reviewed the weekly accumulation areas inspection records and they appeared to be in compliance. See attachment 11 for the most current hazardous waste accumulation areas weekly inspection log dated 08/15/2022.

Training – Mr. Beauchamp stated full satellite accumulation containers are either picked up by the waste haulers, chemical material handlers, or waste management engineers, or if located in highly sensitive areas, the full satellite accumulation containers are taken to a less sensitive area and directly handed off to a waste hauler or chemical material handler by personnel who work in the sensitive areas. The personnel in the sensitive areas have been included in the training plan and have been trained to perform hazardous waste duties. They are identified as support staff or Waste Operators in the training plan and are required to take initial training and continual hazardous waste operations training annually. I spoke with Ms. Linda Yearington and Mr. David Smith, located in building 4 where sensitive areas are located and confirmed that the above-mentioned procedures were being followed and the employees were trained.

Mr. Beauchamp provided me with a copy of KCNSC's RCRA training program overview with written job descriptions for the waste management technical staff, waste operators, waste haulers, and waste handlers. The waste haulers include Waste Operators mentioned above in the report as well as other support staff (see attachment 12). Mr. Beauchamp also provided me with the RCRA training program overview matrix with roles and responsibilities for waste management technical staff (see attachments 13). Mr. Beauchamp stated a program called the electronic Learning Management System (eLMS) was developed to track all employees, identified by their supervisors, required to take any hazardous waste management operations/procedure training. Mr. Beauchamp stated once the employees have been identified, they are given the initial training and added to the eLMS system. The eLMS system then prompts them annually to take hazardous waste operations/procedure training that they have been identified to take. The required training is based on their job duties and may include emergency spill response training and contingency plan training. Mr. Beauchamp provided me with the training records I requested for the KCNSC employees I identified during the inspection performing hazardous waste operations. The requested employee records include Messrs. Bob Beauchamp, Kelly Gant, Tony Brown, Bill Wright and Jason Boswell, and Mses. Linda Yearington, Sybil Chandler, Bridget Langle, and Nicole Opela. Mr. Beauchamp also provided me a complete copy of the eLMS training records/matrix for him as an example of the training program and records available for each employee at KCNSC (see attachment 14). I reviewed the training records and no apparent areas of RCRA non-compliance were noted.

I asked Mr. Beauchamp if he had any training records for the CenterPoint Zimmer, LLC contract employees. Mr. Beauchamp stated that he did not have any training records for any CenterPoint Zimmer, LLC contract employees. However, Mr. Beauchamp stated that the training plan for KCNSC has been updated to include any contractors on-site and require the contractor to have proper training if performing any hazardous waste operations. Mr. Puttoff stated that he also ensures that any CenterPoint Zimmer, LLC staff or contract employees are properly trained in their hazardous waste duties or requires them to contact the KCNSC personnel to perform the duties. Mr. Beauchamp stated that he is not aware of hazardous waste management duties currently being performed at KCNSC by CenterPoint Zimmer that would require their personnel to part of the KCNSC training program. Mr. Beauchamp also stated that he works closely with CenterPoint Zimmer, LLC and MRI Global to ensure only properly identified and trained employees perform hazardous waste operations. Mr. Wolters stated that MRI Global maintains their training program. Mr. Puttoff stated that he would provide any training records for CenterPoint Zimmer, LLC staff or contract employees upon request. I did not identify and CenterPoint Zimmer, LLC staff or contract employees performing any hazardous waste operations during the inspection, and no apparent areas of RCRA non-compliance were noted.

Emergency Management Plan - Ms. Chandler provided me with a copy of the KCNSC Emergency Management Plan dated September of 2021 (attachment 15). The emergency management plan includes both CenterPoint Zimmer, LLC management and KCNSC management working together to respond to natural disasters, fire, security and medical emergencies, and management activation for large spills or cleanup emergencies. I review the

plan and no apparent areas of RCRA non-compliance were noted.

Spill Control Plan and Contingency Plan - Mr. Beauchamp provided me a copy of KCNSC's spill control plan, dated October 2021, and their contingency plan, dated December 1, 2020 (see attachments 16 & 17). A review of the spill control plan identified Mr. Bob Beauchamp as the primary spill coordinator and Messrs. Kelly Gant, Bill Wright, and Tony Brown as the alternate spill coordinators. I asked Mr. Beauchamp if the home addresses and phone numbers were current, and he said yes. No apparent areas of RCRA non-compliance were noted.

4.5 Other RCRA Issues

No additional specific information was requested from the facility during the exit briefing. I provided Mr. Gillihan with the following compliance assistance guidance during the exit briefing: Security Awareness (EPA pamphlet), Commercial Motor Vehicle Transportation Security Planning (EPA information sheet), Publications for Small Businesses (EPA booklet), and U.S. EPA Small Business Resources (EPA Fact Sheet). See attachment 18 for the entry/exit briefing checklist. I reviewed all other applicable RCRA requirements, and no apparent areas of RCRA non-compliance were noted. See attachment 19 for the completed MDNR hazardous waste compliance LQG inspection checklist, universal waste, and used oil generator checklists.

5.0 SUMMARY

I inspected KCNSC on August 17-19, 2022, as an LQG of hazardous waste, a small quantity handler of universal waste, and a generator of used oil. I reviewed pertinent waste management records and visually inspected the waste generation and management areas. These areas include building 1 – basement only, building 2 – all areas with the exception of the sigma 15 and PM100 clean room departments, building 3 – all areas, building 4 – shipping and receiving area, AEF department and machining department, building 5 – all areas, building 6 – all areas, and building 7 – all areas. the permitted hazardous waste storage and treatment areas.

Mr. Wolters who works for CenterPoint Zimmer, LLC, who utilizes contractors to perform physical building systems (shell and core) maintenance activities, informed me that he still considers CenterPoint Zimmer, LLC to be a separate company and operation from the Honeywell operation. Mr. Wolters stated CenterPoint Zimmer, LLC generates no hazardous waste and considers themselves to be a non-generator of hazardous waste, a small quantity handler of universal wastes, and a generator of used oil. I informed Mr. Wolters and the KCNSC staff that I considered the facility to be one operation at one contiguous location and not two separate facilities for the purpose of the RCRA inspection since the facility was built specifically for the USDOE-NNSA operations and that Honeywell controls all access to KCNSC.

I reviewed all applicable Missouri LQG requirements, and I did not observe any environmental concerns or areas of RCRA non-compliance during my inspection. Therefore, a NOPF was not left with KCNSC during the inspection. However, further EPA review may change or add to my findings.

**TREVOR
URBAN**

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TREVOR URBAN
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Trevor L. Urban
Environmental Scientist
ECAD/CB/RCRA
Date:

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Amber Whisnant
Section Chief
ECAD/CB/RCRA, EPA Region 7
Date:

Attachments

1. Confidentiality Notice (1 page)
2. Receipt for Documents and Samples (1 page)
3. Facility Satellite Photo/Map (1 page)
4. Meeting Attendance Log (2 pages)
5. Centerpoint Zimmer Lease Agreement & Universal Waste Shipping Documents (4 pages)
6. Waste Notification dated 08/14/2020 (7 pages)
7. Hazardous & Non-Hazardous Manifest Shipment Summary 10/2019 – 08/2022 (7 pages)
8. IWPW Wastewater Discharge Permit Dated 1/13/2018 – 1/12/2023 (4 pages)
9. Hazardous Waste Manifests #023874099 JJK and LDR, and #023874100 JJK, dated 08/18/2022, #023874094 JJK, dated 07/21/2022, #023874096 JJK, dated 07/28/2022, #023874098 JJK, dated 08/11/2022, (11 pages)
10. Waste Inventory for Waste Management Accumulation Area & Building 7 (14 pages)
11. Hazardous Waste Storage Area Weekly Inspection Log/Summary for 08/15/22 (3 pages)
12. RCRA Training Program Overview w/ Written Job Descriptions for Waste Management Technical Staff, Waste Operator, Waste Hauler, and Waste Handler (7 pages)
13. RCRA Training Program Overview w/ Role and Responsibilities for Waste Management Technical Staff (3 pages)
14. Annual eLMS Training Records/Matrix for Bob Beauchamp (35pages)
15. KCNSC Emergency Management Plan Dated September 2021 (38 pages)
16. Facility Spill Control Plan Dated October 2021 (51 pages)
17. Contingency Plan Dated December 1, 2020 (19 pages)
18. Entry/Exit Briefing Checklist (1 page)
19. MDNR Hazardous Waste LQG, Used Oil & Universal Waste Checklists (17 pages)