

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

**Metal Finishing Company, Inc.
1423 South McLean Boulevard
Wichita, Kansas 67213**

EPA ID Number: KSD007241185

On

March 3 – 4, 2022

By

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 7
Enforcement and Compliance Assistance Division (ECAD)

1.0 INTRODUCTION

I performed a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Metal Finishing Company, Inc., (Metal Finishing) located at 1423 South McLean Boulevard, Wichita, Kansas, on March 3 – 4, 2022. I conducted the RCRA inspection under the authority of RCRA Section 3007(a), as amended. During the inspection, I collected the information and data necessary to make preliminary findings regarding compliance with the applicable RCRA regulatory and statutory requirements. This report and attachments present the results of the inspection.

I inspected the facility as a Large Quantity Generator (LQG), Used Oil Generator, and a Small Quantity Universal Waste Handler (SQUWH).

2.0 PARTICIPANTS

Metal Finishing

David Housby, Environmental and Safety Manager

Richard Smith, Vice President Operations (exit conference only)

Environmental Protection Agency Region 7

Kenneth Herstowski, Environmental Engineer, ECAD/Chemical Branch/RCRA Section

3.0 Previous RCRA CEI

Metal Finishing was last inspected for compliance with RCRA on September 12 – 13, 2017, by the Kansas Department of Health and Environment (KDHE). The report identified the following potential findings or violations in the following areas:

Less than 90-day hazardous waste container management
Universal waste lamp management
Satellite Accumulation container management

4.0 INSPECTION PROCEDURES

I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.1D), unless noted differently. The inspection was unannounced. I completed checklists and other inspection related documents and collected photocopies. I collected 21 photographs with a digital camera and prepared a photographic log (attachments 1 and 2). I monitored for volatile organic emissions with a Thermo Fisher Scientific TVA2020 organic vapor analyzer utilizing a flame ionization detector (hereafter referred to as the “EPA FID”). I viewed potential volatile emission points with an optical gas imaging camera (a FLIR model GF320 – hereafter the “EPA Gas Imaging Camera”). I obtained copies of records from the facility as detailed in the sections that follow.

During the inspection, discussions consisted of the facility operations, wastes generated, and waste management practices. I conducted a visual inspection of hazardous waste management areas. I monitored containers during the inspection following 40 Code of Federal Regulations (CFR) Part 60, Appendix A, Method 21 procedures (hereafter referred to as “Method 21”) using the EPA FID.

Twenty-one photographs were taken during the inspection with a digital camera. I prepared a photographic log for the digital camera images. I obtained four aerial photographs of the facility using Google Earth Pro (attachment 3). I obtained a facility map of Metal Finishing during the inspection (attachment 4). I prepared a Notice of Preliminary Findings (NOPF) as a result of my inspection (attachment 5). Documents and records were collected during the inspection and a Receipt for Documents and Samples was prepared (attachment 6). A Confidentiality Notice in which a claim of confidential business information was not asserted by Metal Finishing (attachment 7).

March 3, 2022

At about 08:29 on March 3, 2022, I arrived at Metal Finishing. A drive-by visual observation was completed from McLean Boulevard (east side of the facility). No issues were identified from the drive-by visual inspection. The facility was operational with onsite vehicle traffic and personnel movement. I entered the administrative building and asked for Mr. Housby. Metal Finishing personnel in the administrative office telephoned Mr. Housby who arrived shortly thereafter. I introduced myself and stated that the purpose of my visit was to conduct a hazardous waste compliance evaluation inspection after which we adjourned to Mr. Housby’s office for an entrance conference.

I presented my EPA credentials to Mr. Housby. I provided a copy of RCRA Section 3007 which provides inspection authority. Mr. Housby provided verbal consent to proceed with the inspection. I described the importance of collecting accurate information and I presented Mr. Housby with a copy of Title 18 United States Code, Sections 1001 and 1002, which provides for penalties if false and/or misleading information is provided

to Federal representatives, and for the possession and use of fraudulent documents. Mr. Housby was made aware of Metal Finishing's confidentiality rights and was informed that a Confidentiality Notice would be provided at the end of the inspection to make a confidential business information (CBI) claim. I provided Mr. Housby with EPA Region 7's "Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections" and reviewed the information with him. Mr. Housby acted as the primary facility representative during the inspection activities.

I explained the purpose, scope, and procedures for the RCRA CEI. I provided to Mr. Housby my prepared records request (attachment 8). I reviewed with Mr. Housby the planned monitoring with the EPA FID and EPA Gas Imaging Camera. After the entrance discussions, I conducted a visual inspection of hazardous waste management areas, used oil management and universal waste management. I conducted monitoring of hazardous waste containers using the EPA FID and viewed possible volatile organic chemical emission points with the EPA Gas Imaging Camera. Mr. Housby accompanied me during the visual inspection. Following the visual inspection of the facility I returned to Mr. Housby's office to review facility records. Following my records review, I departed Metal Finishing.

March 4, 2022

At about 07:56, I arrived at Metal Finishing and was met by Mr. Housby. We adjourned to a conference room where we were joined by Mr. Smith to conduct an exit conference. I reviewed the purpose and scope of the RCRA CEI. I reviewed the notice "Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections" which Mr. Smith signed without claiming any information, documents, or photographs as CBI. I provided a Receipt for Documents and Samples which Mr. Smith signed. I reviewed my findings from the NOPF which Mr. Smith signed. I provided Mr. Smith copies of the NOPF, Receipt of Documents and Samples and Confidentiality Notice (yellow copies of the completed carbonless transfer sets). I departed the facility following the exit conference.

5.0 FINDINGS AND OBSERVATIONS

5.1 General Information/Facility Description

Metal Finishing is a metal finishing company specializing in conventional plating and surface finishing non-destructive testing, painting, shot peen, and flame spray coatings (see <http://metalfinishingco.com>). The company was founded in 1940 in Wichita, Kansas, to provide surface finishing for the burgeoning aircraft and agricultural industries in the Midwest. The facility at 1423 South McLean Boulevard is comprised of multiple buildings in south central Wichita (attachment 3). The area is used for commercial and light manufacturing businesses. The Arkansas River is east of the facility across McLean Boulevard. Residential neighborhoods are approximately 0.33 miles west of the facility and approximately 0.12 miles east of the facility across the Arkansas River. Eight of the buildings have physical addresses: 1329, 1401 (two buildings use this address), 1423, 1425, 1441, and 1445 South McLean Boulevard, and 1448 South Osage. This report uses the convention of describing buildings based on the street number of the building. The facility is located on approximately 9.75 acres of property (estimated with Google Earth Pro using approximate boundaries identified by Mr. Housby).

5.2 RCRA Status

The Notification Acknowledgement/Verification Report (attachment 9) indicates that Metal Finishing is a large quantity generator. Mr. Housby stated Metal Finishing also generates used oil and universal waste. I reviewed the site verification report with Mr. Housby who did not identify any updates. I determined at the time of my inspection that Metal Finishing was generating greater than 1,000 kilograms of hazardous waste per month

based upon e-manifest data for 2021. Based on this information, I reviewed Metal Finishing for compliance with large quantity generator, used oil and universal waste requirements during my inspection.

5.3 Waste Streams and Management

I reviewed Metal Finishing's hazardous waste generation with Mr. Housby. The hazardous wastes managed in significant quantities are described below. I reviewed the 2019 RCRA Biennial Report for Metal Finishing from the EPA RCRAInfo v6 database. The biennial report is consistent with the waste generation and e-manifest information. The KDHE report of the September 12 – 13, 2017, RCRA CEI provides additional information on waste streams not summarized below.

1. **Wastewater Treatment Sludge:** The waste is generated from the treatment of wastewater from plating and anodizing processes. Metal Finishing has determined EPA Waste Codes D006, D007, F006 and F019 apply to this hazardous waste stream. The waste is accumulated near the point of generation in the wastewater treatment area in one cubic yard supersacks. The full containers are moved to the Centralized Container Accumulation Area. The containers most recently were shipped offsite for storage, bulking, and/or transfer off site (EPA management method for biennial reporting – H141) to Univar Solutions USA, Kansas City, Kansas, KSD057889313. Metal Finishing generated approximately 5,043 pounds per month of this waste stream in 2021 based on eManifest data.

2. **Filters and Masking Materials/PPE:** The Filters waste stream is generated from the replacement of filters used in onsite paint booths. Metal Finishing has determined EPA Waste Code D007 applies to this hazardous waste stream from the use of chromium containing paint. The Masking Materials/PPE waste stream is generated from the use of pressure sensitive tape or paper to mask portions of parts to be painted and personnel protective equipment (PPE) used in painting with chromium containing paint. The Masking Materials/PPE are collected in Satellite Accumulation containers at or near the point of generation. Both waste streams are combined at the Centralized Container Accumulation Area where they are compacted into one cubic yard boxes. I obtained Metal Finishings waste profile for Filters (attachment 10). The containers were shipped offsite for energy recovery (EPA management method for biennial reporting – H050) most recently to Green America Recycling, Hannibal, Missouri, MOD054018288. Metal Finishing generated approximately 5,186 pounds per month of this waste stream in 2021 based on eManifest data.

3. **Rags:** The waste is generated from production where rags are used with solvent (primarily methyl ethyl ketone and xylene) for cleaning or to wipe up solvent, masking or paint. Metal Finishing has determined EPA Waste Codes D001, D007, D035, F003 and F005 apply to this hazardous waste stream. I obtained Metal Finishings waste profile for filters (attachment 10). The waste is accumulated near the point of generation in the production areas in containers. The containers are brought to the Centralized Container Accumulation Area where they are compacted into one cubic yard boxes. The containers most recently were shipped offsite for storage, bulking, and/or transfer off site (EPA management method for biennial reporting – H141) to Univar Solutions USA, Kansas City, Kansas, KSD057889313. Metal Finishing generated approximately 4,611 pounds per month of this waste stream in 2021 based on eManifest data.

4. **Spent Methyl Ethyl Ketone (Spent MEK):** The waste is generated from application of masking to parts. Metal Finishing has determined EPA Waste Codes D006, D007, D035 F003 and F005 apply to this hazardous waste stream. The Spent MEK is initially accumulated in Satellite Accumulation containers. The full containers are moved to the distillation unit located at 1425 Building for solvent recovery. The distillation bottoms are shipped off site for energy recovery (EPA management method for biennial reporting – H050) most recently to Green America Recycling, Hannibal, Missouri, MOD054018288. Metal Finishing generated

approximately 1,780 gallons of Spent MEK in 2021 based on distillation unit records. The amount of still bottoms generated from Spent MEK distillation averages about 0.6 gallons per batch.

5. **Aluminum Oxide:** The waste is generated from grit blasting the surfaces of parts. Metal Finishing has determined EPA Waste Code D006 applies to this hazardous waste stream. The waste is initially accumulated in containers near the point of generation. The full containers are moved to the Centralized Container Accumulation Area. The containers most recently were shipped offsite for storage, bulking, and/or transfer off site (EPA management method for biennial reporting – H141) to Univar Solutions USA, Kansas City, Kansas, KSD057889313. Metal Finishing generated approximately 2,188 pounds per month of this waste stream in 2021 based on eManifest data.

6. **Waste Paint:** The waste is generated from excess paint and paint solvent used to paint parts. Metal Finishing has determined EPA Waste Codes D001, D007, D035, F003 and F005 apply to this hazardous waste stream. The waste is accumulated near the point of generation in the production areas in containers. The containers are brought to the Centralized Container Accumulation Area before they are shipped off site. The containers most recently were shipped offsite for energy recovery (EPA management method for biennial reporting – H050) to Green America Recycling, Hannibal, Missouri, MOD054018288. The generation rate of Waste Paint is included with the Rags information above.

5.4 Hazardous Waste Accumulation

Metal Finishing accumulates hazardous waste for less than 90 days in the Bead Blast Room dust collector room in the 1401 Building (also known as the Robbies Hobbies Building), the wastewater treatment system area in the 1423 Building, a Centralized Container Accumulation Area in the 1425 Building, and the methyl ethyl ketone distillation room in the 1425 building. I visually inspected hazardous waste accumulation areas on March 3, 2022. I was accompanied during my visual inspection by Mr. Housby.

See Section 5.7 for the discussion of air emission requirements for containers.

5.4.1 1401 Building (Robbies Hobbies)

Metal Finishing accumulates hazardous waste for less than 90 days in a 55-gallon drum located in an adjacent room to the Bead Blast Room housing a dust collector for the bead blast operations.

Finding Uncited on March 4, 2022, Notice of Preliminary Finding (NOPF) - 40 CFR 265.173(a): Hazardous Waste <90-day accumulation container not fully closed. K.A.R. 28-31-262(a) → 40 CFR 262.34(a)(1)(i)

I emailed this finding to Mr. Housby on March 9, 2022.

The State of Kansas has adopted by reference the EPA's requirements for generators of hazardous waste found at 40 Code of Federal Regulations (CFR) Part 262¹. The requirement at 40 CFR 262.34(a)(1)(i) requires a generator accumulating hazardous waste in containers "... *complies with the applicable requirements of subparts I, AA, BB, and CC of 40 CFR part 265...*" The requirement at 40 CFR 265.173(a) found in 40 CFR

¹ See K.A.R. 28-31-262. Generators of hazardous waste; adoption and modification of federal regulations. In pertinent part, Kansas has adopted the provisions of 40 CFR part 262, including the appendix, as in effect on July 1, 2006.

Part 265, Subpart I, Use and Management of Containers, requires in pertinent part *“A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.”*

I observed one 55-gallon drum containing Aluminum Oxide waste. The drum was an open head style. The container lid was not fully seated and was lacking the locking ring (photograph 7, attachment 1). The drum was in good condition, labeled “Hazardous Waste,” and dated with the accumulation start date.

The area had a spill kit available, fire extinguishers. Employees handling hazardous waste use cellular telephones that can be used to summon assistance.

5.4.2 Wastewater Treatment Plant – Building 1423

Metal Finishing treats wastewater from metal electroplating and anodizing in an onsite wastewater treatment unit located in Building 1423 (attachment 3). The treated wastewater is discharged to the City of Wichita publicly owned treatment works. Metal Finishing has a Wastewater Discharge Permit (#1062) issued date January 3, 2021, by the City of Wichita. Metal Finishing accumulates hazardous waste for less than 90 days in a one cubic yard supersack in the area of the Wastewater Treatment Plant.

I observed one supersack container of Wastewater Treatment Sludge in the area (photograph 11, attachment 1). The container was closed, labeled “Hazardous Waste,” and dated with an accumulation start date.

The area had a spill kit available, fire extinguishers. Employees handling hazardous waste use cellular telephones that can be used to summon assistance.

I observed no apparent issues or findings related to hazardous waste accumulation for less than 90 days at this location.

5.4.3 Distillation Unit – Building 1425

Metal Finishing distills Spent Methyl Ethyl Ketone (Spent MEK) to recover clean solvent for onsite use. The distillation unit is located in room attached to the west end of Building 1425. The distillation unit operates on a batch basis with maximum batch size of approximately 16 gallons. Metal Finishing has sized the containers used to collect Spent MEK at approximately 15 gallons to correspond to the maximum batch size. Containers of Spent MEK are brought to the distillation unit after they are filled at Satellite Accumulation locations.

I observed one container of Spent MEK at the distillation unit. The container was in good condition, closed, labeled “Hazardous Waste,” and dated with the accumulation start date.

The area had a spill kit available, fire extinguishers. Employees handling hazardous waste use cellular telephones that can be used to summon assistance.

I observed no apparent issues or findings related to hazardous waste accumulation for less than 90 days at this location.

5.4.4 Centralized Container Accumulation Area - 1441 Building

Hazardous wastes were formerly accumulated in a Centralized Container Accumulation Area in an extension to the west end of the 1423 Building (attachment 3). Hazardous wastes are now accumulated in the west end of the 1441 Building. I obtained an inventory of the wastes accumulated in the container accumulation area

(attachment 11). Containers of hazardous waste were present and organized on pallet racks on the east and west sides of the room, and in the center area floor of the north end of the room (photographs 18 – 21, attachment 1). The containers were all in good condition, closed, and labeled “hazardous waste.”

The area had a spill kit available, fire extinguishers. Employees handling hazardous waste use cellular telephones that can be used to summon assistance.

I observed no apparent issues or findings related to hazardous waste accumulation for less than 90 days at this location.

5.5 Satellite Accumulation

KDHE requirements for Satellite Accumulation allow, in pertinent part, *“Any generator may accumulate 55 gallons or less, in no more than one container, of each type of hazardous waste and one quart or less, in no more than one container, of each type of acutely hazardous waste listed in § 261.33(e).”* [K.A.R. 28-31-262(c)(6)] Metal Finishing utilizes Satellite Accumulation² of hazardous waste in several areas within the onsite buildings. I visually inspected Satellite Accumulation containers on March 3, 2022. I was accompanied during my visual inspection by Mr. Housby.

5.5.1 1329 Building

Metal Finishing accumulates hazardous waste in one Satellite Accumulation container in the 1329 Building (attachment 3). I observed one Satellite Accumulation container in the Titanium Mask/Etch area. The 20-gallon container was in good condition, closed, labeled “Hazardous Waste.” The hazardous waste stream being accumulated was Rags.

I observed no apparent issues or findings related to Satellite Accumulation at this location.

5.5.2 1401 Building (Robbies Hobbies)

Metal Finishing accumulates hazardous waste in Satellite Accumulation containers in the 1401 Building (Robbies Hobbies) (attachment 3). I observed four Satellite Accumulation containers (photograph 6, attachment 1). The containers were in good condition, closed, labeled “Hazardous Waste.” The four hazardous waste streams being accumulated were Masking Materials/PPE, Aluminum Oxide, Rags, and Plastic Media Blast Dust.

I observed no apparent issues or findings related to Satellite Accumulation at this location.

5.5.3 1401 Building (North Paint Shop)

A second building to the southwest of the building referred to as Robbies Hobbies also has the 1401 street address (attachment 3). This building has been referred to as the North Paint Shop in previous reports. Mr. Housby stated the building is now used for masking operations.

² Satellite accumulation is a term of art for the situation where the generator accumulates hazardous waste in containers at or near any point of hazardous waste generation. The pertinent requirements are found at 40 CFR 262.34(c)(1), et seq. (K.A.R. 28-31-262(a)).

I observed three Satellite Accumulation containers at the west end of the building. An approximately 15-gallon container of Spent MEK was located to the left of an outside doorway (photograph 10, attachment 1). The container was in good condition, closed, and labeled “Hazardous Waste.” I observed no apparent issues or findings related to Satellite Accumulation with this container.

At the west end of the building to the right of an outside doorway, I observed two 55-gallon Satellite Accumulation containers. One container contained Rags (left in photographs 8 and 9, attachment 1). The Rags Satellite Accumulation container was in good condition, closed, and labeled “Hazardous Waste.” I observed no apparent issues or findings related to Satellite Accumulation with this container.

NOPF 1 - 40 CFR 265.173(a): ~Four Satellite Accumulation containers not closed. K.A.R. 28-31-262(a) → 40 CFR 262.34(c)(1)(i)

The State of Kansas has adopted by reference the EPA’s requirements for generators of hazardous waste found at 40 Code of Federal Regulations (CFR) Part 262. The requirement at 40 CFR 262.34(c)(1)(i) allow generators to accumulate up to 55 gallons hazardous waste in containers at or near the point of generation (Satellite Accumulation). In accordance with 40 CFR 262.34(c)(1)(i), Satellite Accumulation must comply, in pertinent part, “...with §§ 265.171, 265.172, and 265.173(a) of this chapter” The requirement at 40 CFR 265.173(a) found in 40 CFR Part 265, Subpart I, Use and Management of Containers, requires “*A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.*”

At the west end of the building to the right of an outside doorway, I observed two 55-gallon Satellite Accumulation containers. One container contained Masking Materials/PPE (right in photographs 8 and 9, attachment 1). The container is of an open head design and the closure on the lid was not locked in place. The Masking Materials Satellite Accumulation container was in good condition and labeled “Hazardous Waste.”

5.5.4 1423 Building

Metal Finishing accumulates hazardous waste in Satellite Accumulation containers in the 1423 Building at several locations (attachment 3).

a) In the Plating Room, I observed one Satellite Accumulation container. The container was in good condition, closed, and labeled “Hazardous Waste.” The hazardous waste streams being accumulated was Rags.

I observed no apparent issues or findings related to Satellite Accumulation at this location.

b) In the Specialty Plating Room, I observed two Satellite Accumulation containers. The containers were in good condition, closed, and labeled “Hazardous Waste.” A 5-gallon container was accumulating Rags and an approximately 15-gallon container was accumulating Spent MEK.

I observed no apparent issues or findings related to Satellite Accumulation at this location.

c) In the Hard Chrome Room, I observed four Satellite Accumulation containers (photograph 2, attachment 1). The containers were in good condition, closed, and labeled “Hazardous Waste.” The four hazardous waste streams being accumulated were Aluminum Oxide, Lead Tape/Lead Anodes, Rags, and Chrome Solids.

I observed no apparent issues or findings related to Satellite Accumulation at this location.

d) In the Mask Prep Room, I observed four Satellite Accumulation containers (photograph 5, attachment 1). A 20-gallon container of Rags, a 10-gallon container of Masking Materials/PPE, a 5-gallon container of Lead Tape, and an approximately 15-gallon container of Spent MEK. The containers were in good condition and labeled "Hazardous Waste." The 20-gallon container of Rags, 10-gallon container of Masking Materials/PPE, and 5-gallon container of Lead Tape were closed.

NOPF 1 - 40 CFR 265.173(a): ~Four Satellite Accumulation containers not closed. K.A.R. 28-31-262(a) → 40 CFR 262.34(c)(1)(i)

I observed an approximately 15-gallon Satellite Accumulation container of Spent MEK. The container had a filling apparatus described as a drum funnel to add hazardous waste to the container. The funnel includes a latching lid to properly close the container. I observed that the funnel lid was unlatched (photographs 3 - 4, attachment 1). The container was in good condition and labeled "Hazardous Waste."

5.5.5 1425 Building

Metal Finishing accumulates hazardous waste in Satellite Accumulation containers in the 1425 Building at several locations (attachment 3).

a) A vapor degreaser is located in the northeast portion of the building. I observed a 5-gallon Satellite Accumulation container of Rags near the wall east of the degreaser. The 5-gallon Rags Satellite Accumulation container was in good condition, closed, and labeled "Hazardous Waste." I observed a 55-gallon container of Rags southeast of the degreaser. The 55-gallon Rags Satellite Accumulation container was in good condition, closed, and labeled "Hazardous Waste."

I observed no apparent issues or findings related to Satellite Accumulation at this location.

b) In an area described as the Shipping Area, I observed three 55-gallon Satellite Accumulation Containers containing Rags/Masking near different points of generation and one 55-gallon Satellite Accumulation Container of Waste Paint. The Waste Paint container was in good condition, closed, and labeled "Hazardous Waste." I observed no apparent issues or findings related to the Waste Paint Satellite Accumulation container.

NOPF 1 - 40 CFR 265.173(a): ~Four Satellite Accumulation containers not closed. K.A.R. 28-31-262(a) → 40 CFR 262.34(c)(1)(i)

I observed two of the Satellite Accumulation Containers of Rags/Masking Materials/PPE in good condition, closed, and labeled "Hazardous Waste." I observed a third Satellite Accumulation Containers of Rags/Masking that was open (photographs 12 and 13, attachment 1). The container is of an open head design and the closure on the lid was approximately two inches open. This Rags/Masking Materials/PPE container was in good condition and labeled "Hazardous Waste."

c) In an area described as the Paint Shop, I observed several Satellite Accumulation containers.

I observed one approximately 15-gallon Spent MEK container and one 55-gallon Paint Waste container along the south wall of the Paint Shop (photograph 14, attachment 1). Both containers were in good condition, closed, and labeled "Hazardous Waste." I observed no apparent issues or findings related to the Satellite Accumulation containers at this location.

I observed one approximately 15-gallon Spent MEK container, one 55-gallon Masking container, one 20-gallon Rags container, and one 5-gallon Masking Materials/PPE container along the north wall of the Paint Shop. The containers were in good condition, closed, and labeled "Hazardous Waste." I observed no apparent issues or findings related to the Satellite Accumulation containers at this location.

I observed one approximately 15-gallon Spent MEK container, one 55-gallon Paint Waste container, one 20-gallon Masking container, and one 5-gallon Rags container northwest portion of the Paint Shop (photograph 15, attachment 1). The containers were in good condition, closed, and labeled "Hazardous Waste." I observed no apparent issues or findings related to the Satellite Accumulation containers at this location.

I observed one approximately 15-gallon Spent MEK container, one 55-gallon Waste Paint container, one 55-gallon Rags container, and one 20-gallon Paint Cups container in the paint mixing area of the Paint Shop. The containers were in good condition, closed, and labeled "Hazardous Waste." I observed no apparent issues or findings related to the Satellite Accumulation containers at this location.

I observed one approximately 15-gallon Spent MEK container, one 55-gallon Paint Waste container, one 20-gallon Masking container, and one 5-gallon Rags container southwest portion of the Paint Shop. The containers were in good condition, closed, and labeled "Hazardous Waste." I observed no apparent issues or findings related to the Satellite Accumulation containers at this location.

d) In the distillation unit room attached to the west end of Building 1425, I observed one 55-gallon drum of Spent MEK still bottoms. The container was in good condition, closed, and labeled "Hazardous Waste." I observed no apparent issues or findings related to the Satellite Accumulation containers at this location.

5.5.6 1441 Building

Metal Finishing accumulates hazardous waste in Satellite Accumulation containers in the 1425 Building at several locations (attachment 3).

a) Inside the area described as the Buffing Room, I observed one 5-gallon Satellite Accumulation container of Rags. The container was in good condition, closed, and labeled "Hazardous Waste." I observed no apparent issues or findings related to the Satellite Accumulation containers at this location.

b) Outside the area described as the Buffing Room, I observed one 5-gallon Satellite Accumulation container of Rags. The container was in good condition, closed, and labeled "Hazardous Waste." I observed no apparent issues or findings related to the Satellite Accumulation containers at this location.

c) In the area described as the Maintenance Area, I observed one 20-gallon Satellite Accumulation container of Rags. The container was in good condition, closed, and labeled "Hazardous Waste." I observed no apparent issues or findings related to the Satellite Accumulation containers at this location.

c) In the area described as the Masking for Flame Spray, Satellite Accumulation containers are located at or near three separate points of generation.

I observed one 5-gallon Satellite Accumulation container of Rags. The container was in good condition, closed, and labeled "Hazardous Waste." I observed no apparent issues or findings related to this Satellite Accumulation containers.

I observed one 55-gallon Satellite Accumulation container of Rags. The container was in good condition, closed, and labeled “Hazardous Waste.” I observed no apparent issues or findings related to this Satellite Accumulation containers.

I observed one 5-gallon Satellite Accumulation container of Spent MEK. The container was in good condition, closed, and labeled “Hazardous Waste.” I observed no apparent issues or findings related to this Satellite Accumulation containers.

5.6 Subpart BB Leak Detection and Repair

NOPF 2 - 40 CFR 265.1064(g)(6): Equipment in contact with hazardous waste for <300 hours not identified. K.A.R. 28-31-262(a) → 40 CFR 262.34(a)(1)(i)

The EPA promulgated requirements for the control of air emissions from equipment leaks at 40 CFR Part 264/265, Subpart BB (hereafter “Subpart BB”). The State of Kansas has adopted by reference the EPA’s requirements for generators of hazardous waste found at 40 CFR Part 262³. The requirement at 40 CFR 262.34(a)(1)(i) requires generators accumulating hazardous waste in containers to comply with in pertinent part “... and the generator complies with the applicable requirements of subparts I, AA, BB, and CC of 40 CFR part 265...” Subpart BB, 40 CFR 265.1050, *et seq.*, includes requirements for monitoring equipment for leaks and repair of detected leaks. 40 CFR 265.1064(g)(6), in pertinent part, requires “*Identification, either by list or location (area or group) of equipment that contains or contacts hazardous waste with an organic concentration of at least 10 percent by weight for less than 300 hours per calendar year.*”

I visually inspected the distillation unit located in room attached to the west end of Building 1425 on March 3, 2022. I was accompanied by Mr. Housby. I observed a pump, a valve, connectors and an open-ended line used to transfer Spent MEK from containers into the distillation unit (photographs 16 and 17, attachment 1). Mr. Housby described the operation of the waste transfer into the distillation unit takes a few minutes for each distillation batch. When the transfer of the waste is complete, a small amount of clean solvent is pumped through the transfer line to clean the line to prevent plugging of the line. I requested records of equipment in contact with hazardous waste for less than 300 hours per year in the opening conference (attachment 8). Mr. Housby did not provide the requested records. I obtained records of distillation unit usage for January 1, 2019, through March 3, 2022 (attachment 12).

I monitored the equipment attached to the distillation unit with the EPA FID in accordance with Method 21 - Volatile Organic Compound Leaks⁴ during my visual inspection. I did not observe volatile organic compound (VOC) leaks above the defined leak definitions in Subpart BB.

5.7 Subpart CC Container Air Emissions

The EPA promulgated requirements for the control of air emissions from tanks, surface impoundments, and containers at 40 CFR Part 265, Subpart CC (hereafter “Subpart CC”). The State of Kansas has adopted by reference the EPA’s requirements for generators of hazardous waste found at 40 CFR Part 262.

³ See K.A.R. 28-31-262. Generators of hazardous waste; adoption and modification of federal regulations. In pertinent part, Kansas has adopted the provisions of 40 CFR part 262, including the appendix, as in effect on July 1, 2006.

⁴ 40 CFR Appendix A-7 to Part 60 - Test Methods 19 through 25E

Metal Finishing is subject to Subpart CC for containers accumulating hazardous waste (large quantity hazardous waste generator requirements) with an average volatile organic concentration (VOC) at the point of generation greater than 500 parts per million by weight. The requirements of Subpart CC vary depending on the size of the container and the concentrations and vapor pressures of organic constituents.

I visually inspected and monitored containers in light material service accessible from the ground in the Centralized Container Accumulation Area in the west end of the 1441 Building for compliance with Subpart CC on March 3, 2022. My monitoring followed Method 21 procedures using the EPA FID.

I observed no apparent issues or findings related to VOC emissions from containers in light material service in the centralized accumulation area.

5.8 Method 21 Monitoring

I calibrated the EPA FID used for Method 21 monitoring prior to my arrival at the facility on March 3, 2022 (attachment 13). The EPA FID. Only the flame ionization detector was calibrated and operated for the Method 21 monitoring, i.e., the photoionization detector was switched off.

5.9 Inspections

Metal Finishing conducts weekly inspections of the less than 90-day hazardous waste accumulation areas. The inspections are documented with log sheets. I reviewed the inspection logs for the period of January 2019 through February 2022. I obtained copies of the inspection logs for that period (attachment 14).

I observed no apparent issues or findings related to review of the inspection records.

5.10 Contingency Plan

I asked to review the current RCRA Contingency Plan. Mr. Housby emailed a contingency plan dated October 14, 2009 (attachment 15). I obtained a copy of the current emergency contacts (attachment 16). The plan included required items such as emergency contacts, and list and locations of emergency equipment. The plan described the actions to take in response to a fire, explosion, or release of hazardous waste. A summary of the plan was provided to local police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services.

I observed no apparent issues or findings related to my review of the contingency plan.

5.11 Training Requirements

I reviewed personnel training with Mr. Housby. Mr. Housby described the training required for Metal Finishing employees consists of modules, including health and safety, transportation, hazardous materials handling, and RCRA requirements. The training in 2019, 2020, and 2021 was conducted in person by Mounce and Associates. Training in 2022 is conducted using online training modules. New hires complete all the required training and on the job training within six months of managing hazardous waste. Refresher training is provided annually.

I observed no apparent issues or findings related to my review of personnel training.

5.12 Manifests

I reviewed hazardous waste manifests information available in EPA's E-Manifest system from June 30, 2018, to present.

I observed no apparent issues or findings related to my review of hazardous waste manifests.

5.13 Universal Waste

Metal Finishing is a small quantity handler of universal waste lamps. Universal waste lamps are accumulated in Centralized Container Accumulation Area (attachment 3).

I visually inspected the universal waste lamp area on March 3, 2022. I observed three boxes of four-foot universal waste lamps. The box was labeled "Universal Waste - Lamp(s), was closed and labeled with the accumulation start date of February 28, 2022.

I observed no apparent issues or findings related to my review of universal waste.

5.14 Used Oil

Metal Finishing is a generator of used oil. Used oil is generated from the servicing equipment. I visually inspected containers of used oil on March 23, 2022. I was accompanied by Mr. Housby.

In the Centralized Container Accumulation Area, I observed two 55-gallon containers of used oil on the west side of the area. The containers were in good condition and labeled "Used Oil."

In the compressor room of the 1425 Building, I observed one 55-gallon container of used oil. The container was in good condition and labeled "Used Oil."

I observed no apparent issues or findings related to the management of used oil.

6.0 COMPLIANCE ASSISTANCE

I provided and reviewed with Mr. Housby the following compliance assistance materials:

Section 3007 Inspections Sheet (EPA Handout)

RCRA Facility Access Information Sheet (EPA Handout)

United States Code 1001/1002 Annotated (EPA Handout)

Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections (EPA Handout)

U.S. EPA Small Business Resource Information Sheet (EPA Handout)

Tampering Pollutes Our Air (EPA Handout)

Clean Air Act Vehicle Aftermarket Defeat Devices and Tampering (EPA Handout)

EPA Enforcement Alert National Compliance Initiative Focus on RCRA Air Emissions June 2020 (EPA Handout)

COMPLIANCE ADVISORY Reduction of Hazardous Waste Air Emissions April 2018 (EPA Handout)

Leak Detection and Repair: A Best Practices Guide (EPA Handout)

Pretreatment Program Factsheet on Hazardous Waste Reporting Requirements for Industrial Users (under 40 CFR 403.12(p) & (k)) November 2016 (EPA Handout)

7.0 SUMMARY

I conducted an inspection of Metal Finishing as a large quantity generator of hazardous waste, small quantity handler of universal waste, and used oil generator. The following preliminary findings are noted as discussed above:

NOPF 1 - 40 CFR 265.173(a): ~Four Satellite Accumulation containers not closed. K.A.R. 28-31-262(a) → 40 CFR 262.34(c)(1)(i)

NOPF 2 - 40 CFR 265.1064(g)(6): Equipment in contact with hazardous waste for <300 hours not identified. K.A.R. 28-31-262(a) → 40 CFR 262.34(a)(1)(i)

Finding Uncited on March 4, 2022, NOPF - 40 CFR 265.173(a): Hazardous Waste <90-day accumulation container not fully closed. K.A.R. 28-31-262(a) → 40 CFR 262.34(a)(1)(i)

Other than the items noted above, no other preliminary findings were noted. However, the EPA may review my findings further after the inspection, which may change or add to my findings.

**KENNETH
HERSTOWSKI**
Kenneth Herstowski
Environmental Engineer

Digitally signed by KENNETH
HERSTOWSKI
Date: 2022.04.19 07:23:51 -05'00' Date: _____

AMBER WHISNANT
Amber Whisnant
Chief, RCRA Section, Chemical Branch
Enforcement and Compliance Assistance Division

Digitally signed by AMBER
WHISNANT
Date: 2022.04.29 20:21:03 -05'00' Date: _____

Attachments

1. Inspection [21] Photographs (22 pages)
2. Photographic Log (2 pages)
3. Metal Finishing Aerial Photograph (4 pages)
4. Metal Finishing Facility Map (7 pages)
5. Notice of Preliminary Findings (2 pages)
6. Receipt for Documents (1 page)
7. Confidentiality Notice (1 page)
8. Records Request (2 pages)
9. Notification Acknowledgement/Verification Report (1 page)
10. Waste Profiles (14 pages)
11. Hazardous Waste Inventory (2 pages)
12. Metal Finishing Leak Distillation Unit Usage (21 pages)
13. EPA FID Calibration and Precision Information (1 page)
14. Inspection Logs (64 pages)
15. Contingency Plan (15 pages)
16. Emergency Contacts (1 page)