ENVIRONMENTAL PROTECTION AGENCY
REGION 1 – NEW ENGLAND
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

November 20, 2023

Cary Atkinson, Plant Manager

Parker Hannifin Corporation.

9 Cutts Road

Kittery, ME 03904

Re: U.S. EPA-Region 1 Inspection Report of Parker Hannifin Corp, September 27, 2023

Dear Mr Atkinson:

In accordance with current policy, I am providing you with a copy of the final inspection report summarizing observations made during the September 27, 2023, inspection of your facility.

This inspection was conducted under the authority of RCRA.

Please contact me at 617-918-1309 or maisano.ryan@epa.gov if you have any questions.

Sincerely,

RYAN MAISANO
Digitally signed by RYAN MAISANO
Date: 2023.11.21 16:25:51 -05'00'

Ryan Maisano, Physical Scientist
Waste and Chemical Compliance Section

cc: Cherrie Plummer, Maine Department of Environmental Protection

Disclaimer: Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

ENVIRONMENTAL PROTECTION AGENCY

REGION 1 – NEW ENGLAND

5 POST OFFICE SQUARE, SUITE 100

BOSTON, MASSACHUSETTS 02109-3912

RCRA Compliance Inspection of:

Parker Hannifin Corp.

9 Cutts Road

Kittery, ME 03904

September 27, 2023
Date of Inspection

November 20, 2023
Date Inspection Report Approved

November 20, 2023
Date Inspection Report Finalized

November 21, 2023
Date Inspection Report Transmitted to Facility

_____
Ryan Maisano, Physical Scientist
Waste and Chemical Compliance Section

MARY ODONNELL Digitally signed by MARY ODONNELL Date: 2023.11.20 16:30:45 -05'00'

_____
Mary Jane O'Donnell, Manager
Waste and Chemical Compliance Section

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RCRA HAZARDOUS WASTE INSPECTION REPORT

I. GENERAL INFORMATION

a. **Facility Name:** Parker Hannifin Corp.

b. **Inspection Date:** September 27, 2023

c. **Inspection Type:** RCRA Compliance Evaluation Inspection (CEI)

d. **EPA Inspectors:** Ryan Maisano, Physical Scientist
Craig Lutz, Environmental Engineer, National Enforcement Investigations Center (NEIC)

e. **EPA ID Number:** MED093624526

f. **NAICS:** 332912-Fuild Power Valve and Hose Fitting Manufacturing

g. **Street Address:** 9 Cutts Road Kittery, ME 03904

h. **Mailing Address:** 9 Cutts Road Kittery, ME 03904

i. **Facility Contacts:** Chad Boelman
Division EHS Manager
Phone: 269-203-6219
Email: chad.boelman@parker.com

Cary Atkinson
Plant Manager
Phone: 207.475.4038
Email: jim.wiedow@nsiindustries.com

j. **Generator Status (per RCRAInfo):** Large Quantity Generator (LQG)

k. **Date first notified as a generator (per RCRAInfo):** 8/13/1980

l. **Date of most recent notification in RCRAInfo:** 2/24/2022

m. **Current Property Owner:** Parker Hannifin Corp., 6035 Parkland Boulevard, Cleveland, OH 44124

n. **Current Operator:** Parker Hannifin Corp., 6035 Parkland Boulevard, Cleveland, OH 44124

a. **Wastes generated (per most recent RCRAInfo notification)**: D002, D006, D008

Report Attachments:

ATTACHMENT 1 – List of documents requested by EPA

ATTACHMENT 2 – Digital photo log of photos taken by EPA inspectors throughout the inspection.

II. FACILITY DESCRIPTION

Parker Hannifin Corp. ("Parker Hannifin" or "Facility") is a large quantity generator that manufactures filters, regulators, and lubricators. Parker Hannifin powder coats parts and assembles products in the Kittery location. The Facility notified initially on 8/13/1980. The waste codes generated, per the most recent biennial report, are D002, D006, and D008. Parker Hannifin Corp owns the property and operates the business. The facility is located within one mile of restaurants, outlet shops, and hiking areas. Kittery School District has a public school with grades four through eight located within two miles of Parker Hannifin. The Kittery location includes offices, a computer numerical control (CNC) machine, powder coating, and assembly.

III. INSPECTION IN-BRIEF

EPA inspectors arrived at the Facility at 9 Cutts Road, Kittery ME on the morning of Wednesday, September 27, 2023. The EPA inspection team ("inspection team") consisted of Ryan Maisano and Craig Lutz. The inspection team arrived at the main entrance of the building and was eventually met by Cary Atkinson, the plant manager. The inspection team presented their EPA credentials to Mr. Atkinson and informed him they were there to perform an unannounced RCRA compliance evaluation inspection. The inspection team was led by Mr. Atkinson to a conference room off the main lobby area to start the in-brief. At this time, Stephen LeClair joined the in-brief. Business cards were given out at this time. The following personnel were present at the in-brief:

EPA:	Ryan Maisano, Physical Scientist
	Craig Lutz, Environmental Engineer
Facility:	Cary Atkinson, Plant Manager
	Stephen LeClair, Maintenance Manager

EPA inspectors started the briefing by providing an overview of the inspection. The team listed records that would be requested, areas of interest, photos, and explained CBI. The team informed Mr. Atkinson that he should notify the team if any photo taken during the walkthrough contained CBI. The team explained the scope of the inspection to Mr. Atkinson. The team then requested information on the business, processes, and generation of hazardous waste.

The following information about the business and operations was relayed from Mr. Atkinson during the opening conference:

Parker Hannifin Corp. owns the property and company. Parker Hannifin also operates the business. The Parker Hannifin, Kittery, ME site employs around 60 people. The employees operate in two shifts: 6:00am to 3:00pm and 3:00pm to 11:00pm. The business operates Monday through Friday and some Saturdays. The facility is around 110,000 square feet and has been in operation for over 50 years.

Parker Hannifin in Kittery manufactures filters, regulators, and lubricators. The facility does the assembly and powder coating of the materials. There is a CNC machine that has been the main source of generation of hazardous waste historically. The wash tank is emptied into totes about every week and a half. These totes have been managed as hazardous waste in the past because of the lead content. The wash water totes are picked up by Clean Harbors by vacuuming the totes into a truck. Mr. Atkinson explained the facility plans on changing the

generator status because they switched to a low-lead brass material. They plan on managing the waste as non-hazardous according to Mr. Atkinson. The notification to Maine was sent by email from Mr. Chad Boelman, Division EHS Manager, on October 23, 2023. The notification updated their generated status as "N-Not a Generator."

Simple Life Recycling takes the machine oil and scrap metal chips to recycle. The machine oil used is Q-Cut 245C, which is a chlorine-free, semi-syntenic cutting fluid. Simple Life Recycling is at the facility every day. They adjust the pH, collect the metal chips/shavings, and fill the machines with oil. The metal chips are collected automatically in a 55-gallon drum during the day.

The facility does not have used oil or aerosol can waste. Universal waste consists of light bulbs.

PPE for the facility tour was discussed and it was determined to include safety glasses and steel toed boots.

The facility includes only one main building. The areas of the main buildings are:

- Assembly
- CNC
- Parts Storage
- Powder Coating
- R&D
- Waste Area

The inspection team completed in-brief discussion and then conducted the walk-through portion of the inspection.

IV. FACILITY TOUR

This section consists of observations by EPA Inspectors during the physical tour of the Facility. Please see Attachment 1 for a digital photo log of photos taken throughout the inspection.

The tour of the Facility took place on September 27, 2023. The following personnel were present for all or part of the tour:

EPA:	Ryan Maisano, Physical Scientist Craig Lutz, Environmental Engineer
Facility:	Cary Atkinson, Plant Manager

Main Building- Assembly

The assembly area is split into 31 different cells. Assembly of the regulators, filters, and lubricants are done in the area. All the 31 cells do the same function. Different product lines can be produced here. No waste is generated here.

Main Building-CNC Machine

CNC machine and wash/rinse tanks located near the assembly area. The wash/rinse lines include three tanks around 100 gallons each (See Attachment 1 photo 1). A solution of 10% Metalnox M6093 is added to the first tank. Metalnox M6093 is a citric acid-based cleaner. The wash/rinse line finishes with a dryer. The tanks were empty at the time of the inspection.

The CNC cutting fluid is handled by the contractor Simply Life Recycling. The contractor checks the pH daily and makes sure the machine is filled with oil. Simple Life Recycling collects the used cutting fluid for recycling. The cutting fluid is water based. Metal chips/shaving is also taken by Simple Life Recycling as scrap metal for recycling.

There was one tote in the area that was not labeled as hazardous waste but was labeled as the cutting fluid for recycling (See Attachment 1 photo 2). The tote is located in secondary containment. A black 55-gallon drum was located in the area which was open at the time of the inspection. It is used for scrap metal chips/shavings. The drum was in use and was about ¼ full at the time of the inspection (See Attachment 1 photo 3).

Main Building-Parts Storage

The parts storage area is located off the main assembly and CNC area and only includes parts storage. There is no waste generated in this area.

Main Building-R&D

The R&D area was not in use at the time of the inspection. An old shot blast machine was located in that area. According to Mr. Atkinson, the machine has not been used in a number of years. The machine has not been disposed of because of cost. The production of any parts that required the shot blast machine have been transferred to the Parker Hannifin Ohio facility. This R&D area is mainly used for storage. No waste is generated in the area.

Main Building-Waste Area

The waste area of the main building included all waste generated in the building; it is located near the R&D area. The waste includes storage of various oils and lubes for the machines. The waste area includes "warning hazardous waste" signage, sprinkler system, spill kits, fire extinguisher, and evacuation map/plan. (See Attachment 1 photos 4-5). The area was surrounded by a small berm. An empty plastic tank was being stored in the area. Mr. Atkinson mentioned that Clean Harbors/Safety Kleen picks up waste about every six weeks.

The waste stored in the area at the time inspection included.

- Eight-250- gallon totes labeled as non-hazardous powder coast wash.
- One-55--gallon drum labeled as non-hazardous non-DOT, non-RCRA regulated off spec used oil, 85-95%; Dated: 9/20/2023
- One-55-gallon drum labeled as hazardous powder coat, Acetone 0.056 ppm, Barium 0.110, Chrome, 0.05 ppm, Citric Acid 5-10 ppm Gluconic acid 1-15 ppm, Lead 0.993ppm, Water

Main Building-Powder Coating

Once an order is received from the customer, it is brought to the powder coating area. The parts are placed on a frame by hand and then the frame rotates through a spraying machine. A scratch test is done on a random part daily with a small amount of MEK. The scratch test is the check the coatings adhesion. Bad adhesion would peel off, if it scratches, the coating had good adhesion. MEK is applied by a cotton swab. The swab is disposed of in the regular trash. An approximately one-gallon container of MEK product is located in the area. According to Mr. Atkinson, it is a very old container and has been there for years due to the small amount of MEK that is used. The powder coat belt is washed with the same Metalnox that is used in the CNC machine. Mr. Atkinson stated they combine this Metalnox waste with the CNC wash/rinse waste.

V. RECORDS REVIEW

The inspection team reviewed all documents on-site following the walk-through portion of the inspection.

Manifests/LDRs

The inspection team reviewed hazardous waste manifests and land disposal restriction notifications from shipments made by Parker Hannifin during 2021, 2022, and 2023. Bill of ladings was reviewed for the same time period for universal waste and used oil. No issues noted on the manifests or LDRs.

Biennial Reports

Biennial reports from 2021-2023 were reviewed along with various confirmation emails and letters from the state. No issues noted on the biennial reports.

Inspection Logs

The inspection team reviewed inspection logs for 2021-2023. The HWAA is done weekly with no weeks missed during the time period reviewed.

Training/Job Descriptions

The inspection team reviewed Parker Hannifin's training certificates and training logs. The last hazardous waste training done at the facility was done on 10/05/2018. A hazardous waste internal training was done on 11/20/2022. Training certificates go to the human resources department to be filed. HR personnel were not on site at the time of the inspection to retrieve the certifications. Current training documents were requested by the inspection team before leaving the facility. According to Mr. Atkinson, J.J. Keller, a contractor performed training in 2022.

Contingency Plan

The inspection team reviewed the Parker Hannifin contingency plan. The contingency plan was updated by the facility in 2023. The contact information was updated when Mr. Atkinson became plant manager and emergency contact in October 2022. Mr. Atkinson originally provided an older contingency plan which listed Todd Leland was the plant manager and emergency contact.

SDS/Hazardous Waste Determinations/Waste Profiles

The inspection team reviewed SDSs, hazardous waste determinations, shipment documents, and waste profiles for the following items:

- Non-hazardous CNC Washwater Shipment
- CNC Washwater Waste Profile
- Q-Cut 245C Machine Oil SDS

No issues noted on the SDS or waste profiles.

VI. INSPECTION OUTBRIEF

An out-brief conference was conducted on date, prior to leaving the facility. The following personnel were present for the closing conference:

EPA:	Ryan Maisano, Physical Scientist Craig Lutz, Environmental Engineer
Facility:	Cary Atkinson, Plant Manager

The EPA inspection team relayed the following areas of concern that arose from observations throughout the inspection.

Areas of Concern:

1. No "No Smoking" sign near waste accumulation area.
2. The inspection team was not provided RCRA training proof since 2018. Mr. Atkinson mentioned it was completed, but nothing was provided to the inspection team by the facility at the time of the inspection.

CNC wash water waste management. It is currently being managed as non-hazardous. Analytical data provided shows that lead levels may still indicate hazardous waste. Mr Atkinson called David McIntyre from Safety Kleen during the closing conference and Mr. McIntyre suggested the CNC wash water is being managed as exempt used oil.
After discussing the above areas of concern, the inspection team reviewed the broad spectrum of all possible post-inspection follow-ups, including both informal and formal notices.

Following this discussion, the inspection team left the premises, concluding the on-site portion of the inspection.

Attachment 1

Photo Log