

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

AT

LAKE CITY ARMY AMMUNITION PLANT

25201 East 78 Highway
Independence, Missouri 64057
(816) 796-5213

RCRA EPA ID Number: MO4213820489

ON

September 27 – 28, 2023

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region 7

Enforcement and Compliance Assurance Division

1.0 INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division/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 Lake City Army Ammunition Plant (LCAAP) located in Independence, Missouri, on September 27 – 28, 2023. 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 Permitted Treatment, Storage, and Disposal (TSD) facility, 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 the Missouri Department of Natural Resources (MoDNR) on September 28, 2022.

2.0 PARTICIPANTS

Lake City Army Ammunition Plant (LCAAP):

Denise M. Bricker, Director, Safety, Health & Environment, Olin Winchester, LLC
Carmen Brock, Environmental Engineer, Olin Winchester, LLC
Dalton Kenig, Environmental Engineer, Olin Winchester, LLC
Kelly Hester, U.S. Army Environmental Coordinator
Brian Batliner, Supervisor, R3 Group, Olin Winchester, LLC
Eric Couch, R3 Group Operator, Olin Winchester, LLC
Bryan Lloyd, R3 Group Operator, Olin Winchester, LLC
Chad Krummel, Supervisor-Maintenance, Olin Winchester, LLC

Adam Hinsdale, Deputy to the Commander*
Lieutenant Colonel Chris Denton, Army Commanding Officer*
Tonya Aggson, Environmental Manager, Olin Winchester, LLC*
Jamie Allison, Vice President of Operations, Olin Winchester, LLC*
* Present only at the Exit Briefing

U.S. Environmental Protection Agency (EPA):
Trevor Urban, Environmental Scientist (913) 551-7133

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 (11:00 a.m.), I checked in at the security station located at the main entrance of the facility. I presented my credentials and explained both the purpose of the inspection and the procedures I would follow to security personnel, and I asked to speak with the environmental compliance personnel. The security personnel contacted the environmental compliance personnel. The security personnel cleared me to access the facility and provided me with a facility access badge.

Ms. Denise Bricker arrived at the security station and I followed her to her office located in building 1 and parked in the parking lot located directly southeast of her office. I followed Ms. Bricker to a conference room near her office located on the second floor of building 1. Ms. Camron Brock, Kelly Hester and Mr. Dalton Kenig joined Ms. Bricker and me 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. Bricker, Brock and Hester and Mr. Kenig. 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 Ms. Bricker, Brock and Hester and Mr. Kenig with a copy of the *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections* and reviewed LCAAP'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. I also inspected the facility for compliance with their RCRA permit. I prepared and completed a site-specific inspection checklist to document my observations.

I reviewed the Notification Acknowledge/Verification Report with Ms. Bricker and Ms. Brock that listed Ms. Tonya Aggson as the facility contact (Attachment 1). Based on this review, I made no changes to the Verification Report. Ms. Bricker stated she was the Director of the Safety Health and Environmental Department at the facility and has worked at LCAAP for approximately twenty-one years. Ms. Brock stated that she was an Environmental Engineer in the Environmental Section at the facility and has worked at LCAAP for approximately nineteen years. Mr. Kenig stated that he was also an Environmental Engineer in the Environmental Section at the facility and has worked at LCAAP since December of 2022. Ms. Hester stated that

she was a civilian employee for the U.S. Army and has been the Environmental Coordinator at LCAAP since March of 2023. Ms. Bricker acted as the official facility representative during the inspection. LCAAP has an on-site explosive waste incinerator (EWI). Mr. Bricker stated that she, Ms. Brock and Mr. Kenig manage the day to day environmental and hazardous waste management activities at the facility which included operating the RCRA permitted EWI. Ms. Bricker, Ms. Brock, and Mr. Kenig provided facility operational information and they all accompanied me during the entire inspection. Ms. Hester also all accompanied me during the entire inspection. Messrs. Batliner and Couch initially accompanied Ms. Bricker, Brock and Hester and Mr. Kenig and me during the visual inspection of buildings 130E, 130F, 68C, 130A, and 49BB – Cells 1 and 3. Ms. Bricker, Brock and Hester, and Messrs. Kenig and Lloyd accompanied me during the visual inspection of buildings 13F, 13E, 13C, and 13D. Ms. Bricker, Brock and Hester and Mr. Kenig accompanied me during the visual inspection of the EWI and buildings 97B, 97 Porch and 97. Ms. Bricker, Brock and Hester, and Messrs. Kenig and Krummel me during the visual inspection of buildings 160 and 161. Ms. Bricker, Brock and Hester and Mr. Kenig accompanied me during the visual inspection of building 1.

The CEI was conducted over the portions of two days. On September 27, 2023, the entry briefing, discussion of waste streams, discussion of compliance information, and the facility visual inspection of the buildings noted above occurred. I also began reviewing documents and records. On September 28, 2023, I completed my review of the requested documents and records. I performed an exit briefing in the afternoon of September 28, 2023. I completed my inspection and summarized the findings and recommendations with Ms. Bricker, Brock and Hester and Mr. Kenig. Also, in attendance at the exit briefing were Mr. Adam Hinsdale, Lieutenant Colonel Chris Denton, Ms. Tonya Aggson, and Mr. Jamie Allison. I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.1E), unless noted differently. At the conclusion of the inspection, during the exit briefing, I provided Ms. Bricker with a *Confidentiality Notice and Receipt for Documents and Samples* which she signed as acknowledgement of receipt (attachments 2 and 3 respectively). No confidentiality claims were made by LCAAP. No findings were observed at the time of the inspection. Therefore, a Notice of Preliminary Findings (NOPF) was not left with LCAAP. No photographs were taken during the inspection. See attachment 4 for the site map/plant operations facility diagram.

4.0 FACILITY DESCRIPTION

4.1 Facility Information and Operations

LCAAP is located at 25201 East 78 Highway in Independence, Missouri. LCAAP is a government owned contract-operated military industrial installation under the jurisdiction of the U.S. Army Industrial Operations Command. Olin Winchester, LLC is the current contract operator of the facility and took over operations on October 1, 2020. However, Alliance Techsystems Operations, LLC (ATO) / Northrop Grumman Corporation (NGC) continues as the contract operator of the 20mm production function in building 65 at the facility. All wastes generated at the facility are managed by Olin Winchester, LLC. LCAAP manufactures small arms ammunition (5.56mm, 7.62mm, 50 caliber, and 20mm), ball rounds, energetic rounds,

tracer rounds, and blank rounds. LCAAP is situated on approximately 3,900 acres of property (attachment 3). LCAAP has approximately 1,550 employees and operates 24-hours per day, seven days per week, utilizing multiple daily shifts. The munitions operations are currently operating 24-hours per day, five days per week (Monday – Friday), utilizing multiple daily shifts and one dayshift on weekends.

On September 28, 2022, MoDNR conducted a RCRA CEI at LCAAP and did not cite any findings during the inspection. The MoDNR issued the facility a Finding of Compliance letter on December 21, 2022. No further action was required by LCAAP. See attachment 5 for the MoDNR Finding of Compliance letter and a copy of the inspection report.

4.2 RCRA Status

According to the Notification Acknowledgement/Verification Report (Attachment 1), LCAAP notified as a Permitted Treatment, Storage, and Disposal (TSD) facility and a Large Quantity Generator (LQG) of Hazardous Waste. I asked Mses. Bricker and Brock to again review the Verification Report for accuracy and they corrected the spelling for “Winchester”. I inspected LCAAP as a Permitted TSD facility and a LQG of Hazardous Waste. I also inspected LCAAP as a Small Quantity Handler of Universal Waste and a Generator of Used Oil. LCAAP’s current permit was issued May 25, 2017, and expires on May 25, 2027. Ms. Bricker stated that LCAAP last submitted a Part B Class I permit modification on August 28, 2023, to update the Vice President/General Manager of the facility to Mike Stock and to add Mr. Dalton Kenig to the contingency plan as an emergency coordinator. Ms. Brock provided me with the Part B Class I permit modifications as well as administration and contingency plan changes since the previous MoDNR inspection via e-mail (Attachment 6). The Part B Class I permit modifications also included the removal of hazardous waste storage bunker 130D from the permitted hazardous waste storage list. Ms. Bricker stated bunker 130D is now utilized for storage of high explosive production materials. Ms. Bricker stated that LCAAP continues to follow the MoDNR satellite accumulation rules.

Mses. Bricker and Brock provided me with the generator hazardous waste quarterly summary reports for the processed EWI waste and non-EWI/hazardous waste that was shipped off site since the previous inspection for review. I took a copy of the generator hazardous waste quarterly summary report for the 2nd quarter of 2023, of the processed EWI hazardous waste (Attachment 7). I also took a copy of the generator hazardous waste quarterly summary report for the 2nd quarter of 2023, of the non-EWI/hazardous waste that is stored in building 13D and shipped off-site utilizing hazardous waste manifests (Attachment 8). LCAAP made approximately 79 off-site shipments of hazardous waste in 2022, and approximately 60 off-site shipments of hazardous waste currently in 2023. LCAAP ships hazardous waste every third Wednesday of the month and the hazardous waste shipments are picked up for disposal by Heritage Environmental Services, LLC, located in Kansas City, Missouri. The designated disposal destinations are Heritage Environmental Services, LLC, located in Kansas City, Missouri; Heritage Environmental Services, located in Indianapolis, Indiana; and Heritage Thermal Services, Inc., located in East Liverpool, Ohio. A review of LCAAP’s uniform hazardous waste manifests indicates that their generator status is correct. LCAAP has an on-site Wastewater Treatment Plant (WWTP). The

largest hazardous waste stream generated by the facility consists of neutralized explosive WWTP sludge. LCAAP also generates waste solvent; solvent-contaminated rags; scrap metal, rags, and corncobs; waste propellant powder; and demil fly ash generated from the EWI baghouse. LCAAP is permitted to store and incinerate characteristic hazardous waste and to also store various F, K, and U-listed hazardous wastes as specified in their Part I Hazardous Waste Permit (HW Permit) issued May 25, 2017, by the MoDNR. The facility currently operates numerous less than 90-day hazardous waste accumulation areas (HWAA) and eleven permitted hazardous waste storage areas (HWSA). LCAAP generates spent fluorescent lamps which are handled as Universal Waste. LCAAP is a Generator of Used Oil.

5.0 FINDINGS AND OBSERVATIONS

5.1 Permit Conditions

LCAAP's eleven HWSAs are located in buildings 97B, 97 Porch, 130A, 130E, 130F, 13D, 13E, 13F, 68C, 49BB Cell 1, and 49BB Cell 3. Building 13D HWSA is permitted to store only non-explosive hazardous waste. Ms. Bricker and Brock provided me with an inventory summary report for buildings 13C and 13D the following day during records review (Attachment 9). Buildings 97B, 97 Porch, 130A, 130E, 130F, 13E, 13F, 68C, 49BB Cell 1, and 49BB Cell 3 are HWSAs permitted to store explosive hazardous waste. Scrap primed cases, propellant contaminated filters, and ballistic scrap metal and projectiles from the firing range are stored in the HWSA in buildings 13E and 13F. Scrap primers and 20 mm projectiles are submerged in water and stored in the HWSAs in building 49BB, Cell 1 and Cell 3. Scrap primed cases, 20 mm projectiles, propellant powder contaminated with debris, 50 caliber projectiles, 5.56 and 7.62 tracer bullets, and scrap ammunition/components are stored in the HWSAs in buildings 97B, 130E, 130F, and 68C. The quantities of hazardous waste allowed for storage in the HWSAs and the maximum explosive limits for each explosive waste storage building are available in the HW Permit. The EWI is designated as building 97. The EWI is designed to demilitarize unserviceable ammunition items, scrap propellant powders, and explosive wastes generated from ammunition manufacturing. Building 97 has two additional HWSAs (97 Porch and 97 Washroom). Building 97 Washroom is not permitted and is considered a less than 90-day HWSA. Ms. Bricker and Brock provided me with a summary sheet for the total number of containers and total net weight/quantity of EWI waste per building the following day during record review. The summary sheet includes the storage permit limits (in gallons) for each building, the storage permit limits (in net pounds) for each building and the total number of containers currently in storage (Attachment 10). Ms. Bricker and Brock also provided me with a container inventory of EWI explosive waste per building (Attachment 11). The inventory includes the accumulation date, container number, waste profile and the content/type of waste for each container in storage.

I conducted a visual inspection of the following permitted storage and treatment areas. Buildings are listed in the order of inspection. Ms. Bricker, Brock and Hester and Messrs. Kenig, Batliner and Couch accompanied me during the visual inspection of the buildings/bunkers.

Building 130E - Explosive Material Storage. There were 47 containers/cans (4,700.00 pounds of net explosives) of dry propellant powder contaminated with debris (two of the containers were

20mm propellant powder – Mixed Type) in storage at the time of the inspection. The containers/cans were closed, labeled as hazardous waste, and the earliest storage accumulation date was 08/18/2023 (Attachments 10 and 11).

Building 130F - Explosive (1.2, 1.3, and 1.4) Material Storage. This HWSA was storing 5.56mm/M856, M8 and M20 ordinance that was going to be used for QA/QC for the EWI. Mr. Bricker stated she did not consider the 5.56mm/M856, M8 and M20 ordinance to be a hazardous waste but it was still included on the hazardous waste totals for the EWI summary report. There were 403 containers/cans (1,336.23 pounds of net explosives) of 5.56mm/M856, M8 and M20 ordinance in storage at the time of the inspection. The earliest storage accumulation date was 07/23/2018 (Attachments 10 and 11).

Building 68C - Explosive Material Storage. There were 102 containers/cans (9,259.26 pounds of net explosives) of dry propellant powder contaminated with debris in storage at the time of the inspection. There was also mercury waste that will be disposed in the EWI. The containers/cans were closed, labeled as hazardous waste, and the earliest storage accumulation date was 04/20/2023 (Attachments 10 and 11).

Building 130A - Explosive Material Storage. There were 21 containers/cans (173.30 pounds of net explosives) of 50 caliber cartridges and 20MM projectiles in storage at the time of the inspection. The containers/cans were closed, labeled as hazardous waste, and the earliest storage accumulation date was 06/29/2023 (attachments 10 and 11).

Building 49 BB - Cell 1 - Explosive (1.1) Material Storage. This building was empty and there were no waste primers or 20mm ammunition/projectiles being stored in the building at the time of the inspection.

Building 49 BB - Cell 3 - Explosive (1.1) Material Storage. There were 77 containers filled with primers covered with water (1,035.75 pounds) in storage at the time of the inspection. The containers were open as allowed per the HW Permit, labeled as hazardous waste, and the earliest storage accumulation date was 08/17/2023 (Attachments 10 and 11).

*Meses. Bricker, Brock and Hester and Messrs. Kenig and Lloyd accompanied me during the visual inspection of the buildings listed below.

Building 13E - Salvage/Disposal Material Storage. This building is used for storing 55-gallon containers of scrap metal/primed cases (5.56 and 7.62 calibers) and ballistic sand and projectiles from the firing range to be incinerated in the EWI. There were 29 containers/cans (296.00 pounds of net explosives) in storage at the time of the inspection. The containers/cans were closed, labeled as hazardous waste, and the earliest storage accumulation date was 07/11/2023 (Attachments 10 and 11). The building also contained numerous empty 55-gallon containers at the time of the inspection.

Building 13F - Salvage/Disposal Material Storage. This building is used for storing 55-gallon containers of primed cases (5.56 and 7.62 calibers) and ballistic sand and projectiles from the

firing range to be incinerated in the EWI. I observed one 55-gallon container of scrap metal/primed cases and four super-sacs of filters collected from projectile building air handling systems that are contaminated with lead, RDX, propellant, pyrotechnic and mag styphnate dusts. The container and super-sacs were closed, labeled as hazardous waste, and the earliest storage accumulation date was 01/24/2023 (Attachment 9). The building also contained numerous empty 55-gallon containers at the time of the inspection.

Building 13A - Equipment Storage. This building is used to store the line crew truck and maintenance equipment. I did not inspect this building during the visual inspection.

Building 13B - Equipment Storage. This building is shared with WWTP department to store empty containers and WWTP products. I did not inspect this building during the visual inspection.

Building 13C – Non-Hazardous Material Storage. Non-hazardous waste is stored in this building including used oil, empty aerosol cans, solvent contaminated rags, water-based paint, PCB ballasts, and universal waste lamps, batteries and mercury containing switches. I observed used oil, universal waste lamps, universal waste batteries and universal waste mercury switches being accumulated in the building at the time of inspection. The universal waste containers were closed, marked as universal waste, and dated with accumulation start dates of less than one year (the latest 02/13/2023). I observed approximately four 55-gallon containers of used oil that were all labeled as used oil. I also observed several 55-gallon containers of non-hazardous water-based paint generated in buildings 1 and 3 from the bullet marking operations. Ms. Bricker stated the non-hazardous water-based paint would be disposed on site via their wastewater treatment plant. See Attachment 9 for inventory at the time of the inspection.

Building 13D - Non-Explosive Material Storage. This HWSA is for hazardous waste destined for off-site disposal. I observed approximately 37 containers of hazardous waste in storage during the inspection. The containers were closed, labeled as hazardous waste and the earliest storage accumulation date was 06/29/2023. I did not observe any issues of concern. See Attachment 9 for inventory at the time of the inspection.

*Meses. Bricker, Brock and Hester and Mr. Kenig accompanied me during the visual inspection of the buildings listed below.

Building 97B - Explosive (1.3 & 1.4) Material Storage. There were 44 containers/cans (445.99 pounds of net explosives) of 5.56mm tracer bullets, 7.62mm and 50 caliber blank 12-gauge cartridges, 50 caliber ammunition, and mercury waste in storage at the time of the inspection. The cans were closed, labeled as hazardous waste, and the earliest storage accumulation date was 03/22/2023 (Attachments 10 and 11).

Building 97 Porch - Explosive (1.3 & 1.4) Material Storage. This building/area was empty and there were no wastes being stored in the building at the time of the inspection.

Building 97 – The EWI is located in this building. Ms. Bricker stated that the permitted metal air

emissions are regulated under the maximum achievable control technology subpart EEE standards. Ms. Bricker stated that the EWI air emissions are continually monitored for metals each minute and the data is accumulated daily. The EWI had completed its daily run and was shut down and not in operation during the visual inspection. However, I visually inspected the washroom, control room, incinerator, baghouse, and kill tank areas of building 97.

I visually inspected the permitted hazardous waste storage and treatment areas. I did not observe non-compliance with the waste management requirements of the HW Permit. The HW Permit includes standard, general and special permit conditions. Special permit conditions include: Storage in Containers [40 CFR Part 264 Subpart I], Incinerator Requirements [40 CFR Part 264 Subpart O], Post-Closure Care Requirements [10 CSR 25-7.264(2)(G)], Waste Minimization [40 CFR 264.73(b)(9)], Groundwater Protection Standards [40 CFR Part 264 Subpart F], Seismic Evaluation Requirements [10 CSR 25-7.270(2)(B)4], Land Disposal Restriction Requirements [40 CFR Part 268], and Air Emissions Standards for Tanks, Surface Impoundments, and Containers [40 CFR Part 264 Subpart CC].

5.2 Facility Wastes

LCAAP handles the disposal of their various hazardous waste streams via off-site disposal at an authorized TSD, via the on-site EWI or via treatment in the on-site WWTP and discharges to the Little Blue Valley Sewer District.

I inspected several buildings that generate hazardous waste at the facility and spoke with personnel that control and operate those functions in each building on the afternoon of September 27, 2023. Ms. Bricker, Brock and Hester and Mr. Kenig accompanied me during the visual inspection of the buildings listed below and are listed in the order of inspection. Mr. Chad Krummel, Supervisor-Maintenance & Chief Operator of the WWTP, also accompanied me during the visual inspection of the buildings 160 and 161 and provided the operational and waste management activities performed in those buildings.

Building 160 – Mr. Krummel stated the neutralized explosive WWTP is located in this building. This on-site WWTP is designed to treat the neutralized explosive wastewater. The neutralized explosive wastewater treatment plant sludge is stored in 30-cubic-yard roll-off containers. There was one roll-off inside the building positioned under the north WWTP filter press. The south roll-off was currently empty during the inspection. Mr. Krummel stated the north roll-off was approximately half full and that the south roll-off was currently staged outside awaiting to be placed under the south filter press. The north roll-off contained K046 and D005 hazardous waste and was dated with accumulation start date. The north roll-off was closed/tarped and labeled as hazardous waste. Ms. Bricker stated the roll-offs are dated when they are placed into the building and that approximately two roll-off containers of the hazardous waste are generated weekly. Ms. Bricker stated they are picked up every Tuesday and with an on-call option when production increases. The neutralized explosive WWTP sludge is sent off site for disposal as K046 and D005 hazardous waste. The designated disposal facility is Heritage Environmental Services, located in Indianapolis, Indiana. The treated wastewater is discharged in accordance with a pretreatment permit to the sewer operated by Little Blue Valley Sewer District.

Building 161 - Mr. Krummel stated the pyrotechnic wastewater collected from the production areas is accumulated in 55-gallon metal drums prior to treatment. The debris is removed by screens, containerized and accumulated as hazardous waste prior to treatment. Cloth rags generated in the pyrotechnic production areas are also collected and pre-rinsed in building 161 prior to being laundered. The treated sludge has been determined to be non-hazardous waste. The non-hazardous sludge is collected in a 20-cubic-yard roll-off container and disposed at the Johnson County Landfill, Inc. The treated wastewater discharge to the sewer is permitted by the Little Blue Valley Sewer District. I observed the non-hazardous sludge and storm water being accumulated in the 20-cubic-yard roll-off container with a cover/lid on top of the container.

Building 1 – 5.56mm Ammunition Manufacturing. Building 1 has two levels for production. The first and second floors both perform priming and loading activities. The first floor also includes scamp, caseline, inner and outer tip, packaging with solvent waste, and maintenance with universal wastes. The second floor includes pull down wastes, tip ID, and bullet burnish with phosphoric waste. The SACs which I observed in use during the inspection of Building 1 were closed, labeled as hazardous waste, and dated. Universal waste is stored in the building 1 maintenance area. I observed a fiberboard container of spent fluorescent lamps and a pail of batteries. The containers were closed, labeled as universal waste, and dated. I also observed one 55-gallon drum SAC for empty aerosol cans, and one 55-gallon drum SAC for broken fluorescent lamps. Both of the SACs were closed, labeled as hazardous waste, and dated.

Universal Waste Lamps and Batteries - LCAAP utilizes both 4' and 8' fluorescent lamps. The spent fluorescent lamps are picked up every third Wednesday of the month for recycling by Heritage Environmental Services. All the containers for spent fluorescent lamps which I observed during the inspection were closed, marked as universal waste lamps, and dated. LCAAP also utilizes batteries throughout the facility and the batteries are collected and managed in the same manner as the lamps. Ms. Brock provided me with the universal waste bills of lading for the shipments of universal waste lamps and batteries for review. I provided the LCAAP representatives with compliance assistance information regarding management of spent fluorescent lamps and batteries.

Used Oil - Used oil is generated from facility vehicles and equipment. The used oil is picked up for recycling by Heritage Environmental Services. The generation rate is approximately 3,500 - 4,000 gallons per week. Approximately 90% of all used oil is generated from treatment of oily wastewater from production in the dissolved air flotation unit located in the WWTP. Ms. Brock provided me with the used oil bills of lading for the used oil shipments for review. All the used oil containers which I observed during the inspection were closed and marked as "used oil". I provided the LCAAP representatives with compliance assistance information regarding collection and management of used oil.

Scrap Metals - Scrap metal is recycled by Wieland Recycling North America (Wieland Group), located in Granite City, Illinois. The generation rate for scrap metal is variable. Brass is separated and recycled separately from other metals.

General Trash - The general trash is picked up daily by Republic Services, located in Independence, Missouri.

5.3 Other Regulatory Requirements

Emissions: 40 CFR Part 265 Subparts AA, BB, CC - EPA regulations in 40 CFR Part 265, Subparts AA, BB, and CC apply to LQGs. If a LQG manages hazardous waste with an organic concentration greater than 10 parts per million by weight (ppmw), the standards found in Subpart AA apply to hazardous waste air emissions from certain process vents. A process vent used in distillation, fractionation, solvent extraction, thin-film evaporation, air stripping, or steam stripping is regulated by Subpart AA. Ms. Bricker stated that LCAAP is not subject to the Subpart AA regulations because the facility does not have any of the process vents listed above.

If a LQG has equipment that contains or contacts hazardous waste composed of 10 percent or greater organics by weight, the facility is subject to Subpart BB standards for inspection and monitoring of the equipment. Ms. Bricker stated that LCAAP is not subject to the Subpart BB regulations because it does not have equipment that contains or comes in contact with hazardous waste.

The standards found in Subpart CC apply to LQGs that manage hazardous waste in containers, tanks and surface impoundments, with volatile organic compounds (VOC) concentration that exceeds 500 ppmw. The Subpart CC standards are applicable at LCAAP because the facility accumulates hazardous waste with VOC concentrations in containers. During the CEI, I determined that LCAAP complies with the Subpart CC requirements for 55-gallon containers by using Container Level 1 controls (containers approximately 26 to 122 gallons that are U.S. Department of Transportation [DOT]-approved). I visually inspected containers of hazardous waste stored in Buildings 1, 13D, 13C, and 161 on September 27, 2023. The containers subject to Level 1 controls were closed and were US Department of Transportation (DOT) shipping containers. I noted no concerns with management of hazardous waste per the Subpart CC air emissions requirements.

Pre-Transport, Containerization, and Storage - All the accumulation containers that I observed during the inspection were in good condition, closed, marked as hazardous waste, and dated. I observed no signs of spills or releases of any kind in any of the HWAAs. I asked Ms. Bricker and Brock and Mr. Kenig how often the HWSAs are inspected, and Ms. Brock stated the areas are inspected weekly. I reviewed the weekly inspection sheets for buildings 97B, 97 Porch, 130A, 130E, 130F, 13D, 13E, 13F, 68C, 49BB Cell 1, and 49BB Cell 3 for the past twelve months (back to the previous inspection date). The weekly inspections are documented and included all the required information and include the post closure permit required inspections for solid waste management units. LCAAP also documents the weekly inspections of all the hazardous waste accumulation and storage areas. I did not observe any issues of concern.

Satellite Accumulation - I observed numerous SACs in use during the time of the inspection. The SACs that I observed during the inspection were closed, labeled as hazardous waste, and

dated. The SACs that I observed had all been in use for less than one year. I observed no signs of spills or releases at any of the SACs.

Preparedness, Prevention and Emergency Procedures - All the areas of the LCAAP which I visually inspected appeared to be operated to minimize the possibility of a hazardous waste release and have the necessary response equipment and communication devices readily available.

Uniform Hazardous Waste Manifests – Ms. Brock stated the LCAAP ships hazardous waste every third Wednesday of each month and provided me with the 2022 and 2023 uniform hazardous waste manifests for review. I reviewed all the 2023 manifests and approximately 45 of the 79 manifests generated in 2022 and they appeared to meet the regulatory standards. The facility made approximately 139 off-site shipments of hazardous waste from January 1, 2022 – September 12, 2023. See Attachment 12 for copies of the Hazardous waste manifests and LDRs for shipments in September of 2023. No issues or findings were noted. Ms. Brock also provided me with a copy of the generator hazardous waste quarterly summary reports for the 1st – 4th quarters of 2022, and the 1st and 2nd quarters of 2023, for the non-EWI/hazardous waste that is stored in building 13D for review. See Attachment 8 for the 2nd quarter of 2023 report. I did not observe any issues of concern.

Land Disposal Restrictions - The land disposal restriction notices were on file for all waste codes shipped off site during the past twelve months and appeared to meet the regulatory standards. I did not observe any issues of concern.

Waste Minimization Plan – Ms. Brock provided me with the P3 Plan (Pollution Prevention Plan) for review. Ms. Brock stated the P3 plan served as the facility waste minimization plan. I reviewed the P3 plan and did not observe any issues of concern.

Contingency Plan - The LCAAP contingency plan was reviewed in depth. Ms. Bricker and Brock stated that the contingency plan was reviewed and recently revised in June of 2023. Ms. Brock provided me with a copy of the contingency plan dated June 2023, after the conclusion of the inspection via e-mail (Attachment 13). Appropriate arrangements and coordination have been made with the local response agencies. An emergency coordinator is always available for response to emergencies. The home addresses and phone numbers of the emergency coordinators were included in the contingency plan (Attachment 13 page 13). The contingency plan includes the description and location of emergency equipment, and an evacuation plan. I reviewed the contingency plan and did not observe any issues of concern. The contingency plan updates are included in Attachment 6 as part of their Part B Class I permit modifications.

Personnel Training - I reviewed the personnel training plan and records in depth and the records revealed that the employees had received the appropriate training in the required time frame. The training plan includes several tables that have current employee rosters with job titles and job descriptions for the required RCRA training. Ms. Bricker stated that she had updated the training program after the previous RCRA inspection and that all employees receive “waste container transfer” training. Ms. Brock provided me with a copy of job titles and descriptions and a training plan matrix for employees who perform hazardous waste operations during the

inspection for review (Attachment 14). Ms. Brock also provided me with copies of the 2022 hazardous waste training attendance sheets for contingency plan and R3 Group employees DOT, 8-hour Hazwoper and RCRA annual regulatory training for review (Attachment 15). Original Hazwoper Training certificates for R3 Group employees Eric Couch and Bryan Lloyd were also provided by Ms. Brock for review (Attachment 15). I reviewed the training plan, matrix and training records and did not observe any issues of concern.

5.4 Additional RCRA Issues

RCRA Post Closure Permit Requirements – LCAAP has been managing several impoundments and trenches as part of their RCRA permit for the past 30 years. LCAAP and MoDNR entered into an agreement to extend the post-closure care of the impoundments and trenches and defer the post-closure care activities to the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) Program. MoDNR in letter dated December 28, 2020, approved Lake City's Class 2 Permit Modification to extend Post-Closure Care for the closed Oil and Grease Trenches, the East IWTP Closed Surface Impoundments, the Closed Explosive Wastewater Lagoons, the Explosive Wastewater Impoundments and Area 8 Landfill. The post-closure care, groundwater monitoring, groundwater protection standards and corrective action for releases of hazardous waste or hazardous constituents from hazardous waste management units subject to post-closure care at Lake City are deferred to CERCLA.

The Part B Class I permit modifications included the removal of hazardous waste storage bunker 130D from the permitted hazardous waste storage list. Ms. Bricker stated bunker 130D is now utilized for storage of high explosive production materials. Mr. Bricker stated that post-closure care of bunker 130D would be performed once the bunker was no longer used for storage of explosive materials.

No additional specific information was requested from the facility during the exit briefing. I provided Ms. Bricker 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 16 for the entry/exit briefing checklist and exit briefing attendance sheet. I reviewed all other applicable RCRA and TSD facility requirements and no other apparent violations were noted.

6.0 SUMMARY

I inspected LCAAP as a permitted TSD facility, an LQG of hazardous waste, a small quantity handler of universal waste, and a generator of used oil. LCAAP's current permit was issued on May 25, 2017, and expires on May 25, 2027. Ms. Bricker stated that she, Ms. Brock, and Mr. Kenig manage the day to day environmental and hazardous waste management activities at the facility which include the operation of the permitted EWI. I visually inspected the permitted hazardous waste storage and treatment areas. LCAAP appears to be in compliance with all the standard, general and special permit conditions in the HW Permit. LCAAP and MoDNR entered into an agreement to extend the post-closure care of the impoundments and trenches and defer

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

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URBAN

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

AMBER WHISNANT

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

Attachments:

1. Notification Acknowledgement/Verification Report (2 pages)
2. Confidentiality Notice (1 page)
3. Receipt for Documents and Samples (1 page)
4. Facility Diagram/Site Map (1 page)
5. MoDNR RCRA CEI Report Dated 09/28/2022 (17 pages)
6. RCRA Part B Permit Modifications Dated 8/25/22, 9/26/22, 2/3/23, & 8/28/23 (10 pages)
7. 2023 2nd Quarter Generator Summary Reports for EWI Waste (2 pages)
8. 2023 2nd Quarter Generator Summary Reports for Non-EWI/Off-Site RCRA Shipments (4 pages)
9. Permitted Storage Inventory and Profiles of Non-Explosive Waste in Buildings 13D and 13C (5 pages)
10. Permitted Storage Inventory Summary of EWI Explosive Waste Per Building (1 page)
11. Permitted Storage Container Inventory of EWI Explosive Waste Per Building (24 pages)
12. Hazardous Waste Shipping Manifest and LDRs Dated 9/12/23 & 9/6/23 (8 pages)
13. Contingency Plan Dated June 2023 and September 2023 Updates (23 pages)
14. Job Titles and Descriptions with Training Plan Matrix for R3 Operators and Waste Management Personnel (4 pages)
15. R3 Operators, Wastewater Operators and Environmental Personnel 2023 RCRA Training Records and Certificates for Eric Couch and Bryan Lloyd (5 pages)
16. Entry/Exit Briefing Checklist with Exit Briefing Attendance Roster (4 pages)