

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

MISSION SYSTEMS DAVENPORT INC.

2734 Hickory Grove Road
Davenport, Iowa 52804
563-383-6330

EPA ID Number: IAD005268420

On

May 23, 2023

By

TOEROEK ASSOCIATES, INC.

For

U. S. ENVIRONMENTAL PROTECTION AGENCY

Region 7

Enforcement and Compliance Assurance Division

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, Toeroek Associates, Inc., and its subcontractor CLAENE Group (Toeroek team) conducted a hazardous waste compliance evaluation inspection (CEI) at Mission Systems Davenport Inc. (Mission) at 2734 Hickory Grove Road, Davenport, Iowa. The CEI was conducted under the authority of Section 3007 of Resource Conservation and Recovery Act (RCRA), as amended. The CEI covered hazardous waste generator requirements, used oil management, and universal waste requirements, as applicable. This report and its attachments present the results of the CEI.

PARTICIPANTS

Mission:

Ingrid Scardino, Environmental Health and Safety Manager
Chadwick Cardott, Environmental Health and Safety Analyst
John Wetherell, Vice President Operations (Entry and Exit Briefing only)
Tom Dillon, Painter
Joe Moore, Millwright

Toeroek Team:

Clifford Nelles, Inspector, 816-213-5192

INSPECTION PROCEDURES

Prior to the CEI at Mission on May 23, 2023, I conducted a drive-by visual inspection. I did not observe any areas of concern during the drive-by. At approximately 7:45 a.m., I entered the security office and informed the officer of my intent to conduct a CEI. The officer contacted Ms. Scardino, who met me in the security office. After brief introductions, I explained the purpose and scope of the CEI to Ms. Scardino. Ms. Scardino and I adjourned to a conference room where we were joined by Messrs. Cardott and Wetherell. I proceeded to conduct an entry briefing with them.

During the entry briefing, I presented my business card and EPA credentials to Ms. Scardino. I explained the scope and procedures for the CEI. I explained the facility's right to make confidentiality claims for any or all the information obtained and provided a Notice Regarding Proprietary/Confidential Business Information. I stated that at the conclusion of the CEI, Ms. Scardino would be presented with a Confidentiality Notice (Notice) with which she could make or not make a claim of confidentiality for the facility. I also provided Ms. Scardino and Messrs. Cardott and Wetherell a copy of U.S. Federal Codes 1001 and 1002, concerning communication of false statements and documents to federal inspectors, and RCRA Section 3007, explaining EPA's inspection authority, both of which they read.

A copy of each of the following documents was left with Ms. Scardino during the inspection:

- RCRA Facility Access Information Sheet
- Mr. Trevor Urban's business card
- RCRA Section 3007
- U.S. Federal Codes 1001 and 1002
- Instructions for Responding to a Notice of Preliminary Findings
- Notice Regarding Proprietary/Confidential Business Information
- E-Manifest Fact Sheet: Generators
- Managing your Hazardous Waste: A Guide for Small Businesses
- U.S. EPA Small Business Resources Information Sheet
- Solvent-Contaminated Wipes Final Rule Summary Chart
- IDNR Excluded Solvent-Contaminated Wipes Rule: Management Practices for Wipes, Rags, and Shop Towels
- Recycling Electronics: A Guide for Businesses
- Lead-Based Paint Activities: Handling and Disposal
- Battery Recycling/Disposal
- Management of Fluorescent Lamps for Businesses
- Incompatible Chemicals
- Universal Wastes – Including Aerosol Cans
- TCLP – Toxicity Characteristic Leaching Procedure
- Part 279 Requirements: Used Oil Management Standards
- EPA Region 7 Emergency Response Program
- Chemical Facility Anti-Terrorism Standards
- Iowa Environmental Guide for Businesses

I reviewed the Notification Acknowledgement/Verification Report (Verification Report) with Ms. Scardino (Attachment 1). Based on this review, I updated Ms. Scardino's job title and email address on the Verification Report. I made no other edits or changes to the Verification Report.

I conducted a visual inspection of the facility, accompanied by Ms. Scardino and Mr. Cardott. Following the visual inspection, I reviewed facility records including hazardous waste manifests with land disposal restriction (LDR) notifications, safety data sheets (SDS), contingency plan, inspection records, and training documentation. I prepared and completed a site-specific inspection checklist to document my observations.

At the conclusion of the CEI, I conducted an exit briefing with Ms. Scardino and Messrs. Cardott and Wetherell. During the exit briefing, I provided a Receipt for Documents and Samples, which Ms. Scardino signed, acknowledging receipt (Attachment 2). I provided Ms. Scardino the Notice, which she signed indicating no confidential business information had been provided (Attachment 3). I also provided Ms. Scardino a Notice of Preliminary Findings (NOPF) which she signed to acknowledge receipt (Attachment 4).

A map of the facility obtained during the CEI is included in Attachment 5, and a Google Earth aerial photograph of the facility is included as Attachment 6. The 26 photographs taken during the CEI are included in Attachment 7, of which 24 are described in this report.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

Mission manufactures aerospace components, including oxygen systems, restraint systems, and fueling systems. Raw materials used in the production process include metal parts, paints, chemical coatings, solvents, and purchased components. The facility has a paint booth where small parts are painted prior to assembly. Electronic, electrical, and mechanical systems are then assembled in several assembly areas from previously manufactured parts.

Painting operations generate waste paint related material (WPRM), which is a liquid waste generated in the paint kitchen during paint gun cleaning. The paint guns used at Mission are gravity fed and do not use solvent in the painting process. When paint gun cleaning is required, the paint gun is disconnected from the paint line and taken to a gun cleaning machine in the paint kitchen. Paint is flushed from the gun using solvent and resulting WPRM is accumulated in a 55-gallon satellite accumulation container (SAC). WPRM also includes mixed paint that cannot be used. WPRM is considered hazardous based on product and process knowledge.

Painting operations also generate used paint booth filters, which the facility has also determined to be hazardous. The largest waste stream generated from painting is used personal protective equipment (PPE), wipes, and other solid debris that has been contaminated with paint or solvents. This debris is consolidated into a single hazardous waste stream that is generated across the facility, identified by the facility as paint debris (PD), which is managed separately from the used paint booth filters.

In the assembly areas, parts are cleaned with solvents. Solvent-contaminated wipes and applicators are consolidated with the PD waste stream, with a separate satellite accumulation area (SAA) at each work station. Spent solvent also is generated in the assembly areas and is considered hazardous waste. Assembly operations also generate soldering debris, which is considered hazardous waste.

In the refueling assembly area, Mission manufactures the aluminum pod that houses equipment used for air-to-air refueling. The manufacturing process includes application of a protective chromate conversion film to the aluminum (chemical conversion coating of aluminum). The waste generated in the process includes wastewater (water used to rinse the pod during and after manufacturing). Waste conversion coating is also generated from the conversion process. However, I did not observe this waste during the inspection, and it is not discussed further in this report. Wastewater is processed through an ion-exchange treatment unit, and then discharged to the City of Davenport publicly owned treatment works (POTW). The wastewater is considered exempt from the definition of solid waste.

Additional wastes generated during the manufacturing process include waste molecular sieve media (used to separate oxygen from nitrogen), jet fuel absorbent, used aerosol cans, and lab pack waste. Molecular sieve media waste is typically nonhazardous but sometimes becomes contaminated with jet fuel. Waste molecular sieve media waste contaminated with jet fuel is considered hazardous waste. Testing refueling systems requires that units be filled with jet fuel, and then drained. Floor dry absorbent is used to collect any incidental spills of jet fuel. Empty aerosol cans and a variety of containers of unused or expired chemicals are generated throughout the manufacturing process. These containers are collected in the main less-than-90-day hazardous waste container accumulation area (HWCAA). Aerosol cans are punctured in the HWCAA. The residue is collected and considered hazardous waste, and the punctured cans are recycled as scrap metal.

Other small-volume wastes are characterized by maintenance staff in the HWCAA, and managed as hazardous or nonhazardous waste, as appropriate. Containers of these wastes are lab-packed when collected for disposal. Research and Development (R&D) laboratories at the facility also generate PD, spent solvents, and soldering debris-all consolidated with similar wastes generated in assembly areas.

Facility and equipment maintenance also generates used aerosol cans and lab-packed waste, which are managed as described above. Used oil is generated from maintenance of compressor and hydraulic equipment. Used oil is managed according to Title 40 *Code of Federal Regulations* (40 CFR) Part 279, and is sent for recycling. Used lamps and batteries generated through facility and equipment maintenance are managed as universal wastes, per 40 CFR Part 273, and are sent for recycling. General trash is considered nonhazardous and is accumulated in roll-off containers outside the facility until collected for landfill disposal.

Altogether, the facility generates and manages more than 100 industrial hazardous and nonhazardous wastes. A list of the 50 waste streams that have been generated at the facility since the beginning of 2023 is included in Attachment 8. Because of the number of wastes and the variety of manufacturing operations at the facility, I have included descriptions of only the

highest volume hazardous wastes (PD, spent solvent, and WPRM) and wastes I personally observed during the inspection. The above description of facility operations should not be considered a comprehensive description of all operations and waste streams.

Mission is located in a commercial/residential area in the northwest part of Davenport, Iowa. Mission has been operating at this location since 1969. The facility employs 742 personnel who work one of two shifts (5:30 a.m. to 2:30 p.m. or 3:00 p.m. to 11:30 p.m.) Monday through Friday. The facility is comprised of one building with approximately 361,700 square feet under roof. Mission's primary North American Industrial Classification System (NAICS) code is 336413 (Other Aircraft Parts and Auxiliary Equipment Manufacturing).

Mission was last inspected by an EPA contractor on August 14, 2018, with the following preliminary findings:

- Failure to label one SAA container with the words "hazardous waste," as required by 40 CFR 262.15(a)(5)(i)
- Failure to label five SAA containers with the nature of the hazard, as required by 40 CFR 262.15(a)(ii)
- Failure to completely close one SAA container when not in use, as required by 40 CFR 262.15(a)(4)
- Failure to label eight hazardous waste accumulation containers (HWAC) with the nature of the hazard, as required by 40 CFR 262.17(a)(5)(i)(B)
- Failure to mark one HWAC with the accumulation start date, as required by 40 CFR 262.17(a)(5)(i)(C)
- Failure to date or otherwise track accumulation time for one container of universal waste batteries, as required by 40 CFR 273.15(c)
- Failure to update the list of emergency coordinators in the RCRA contingency plan, as required by 40 CFR 262.17(a)(6) referencing 40 CFR 262.261(d)
- Failure to include evacuation routes and evaluation signals in the RCRA contingency plan, as required by 40 CFR 262.17(a)(6) referencing 40 CFR 262.261(f)
- Failure to include hazardous waste duties in the job description for hazardous materials handlers, as required by 40 CFR 262.17(a)(7)(iv)(B)

Of the preliminary finding above, failure to keep a SAC closed and failure to label two SACs with the nature of the hazard were repeated during this CEI.

2. RCRA Status

The Verification Report (Attachment 1) indicates that Mission is registered with EPA, under EPA ID IAD005268420, as a large quantity generator (LQG) of hazardous waste, generating more than 1,000 kilograms [kg] or 2,200 pounds of hazardous waste per month. I confirmed the facility's generator status through review of the facility's 2021 Hazardous Waste Biennial Report, current operations, interviews, and review of waste disposal records.

Mission's 2021 Biennial Report summary, provided by EPA prior to the inspection, is in Attachment 9. The 2021 Biennial Report included 19,732 pounds of PD and 15,200 pounds of spent solvent (Attachment 9, Pages 6 and 10). The total of 34,932 pounds is approximately 2,911

pounds (1,320 kg) per month for these two waste streams alone. The facility's 2022 and 2023 manifests indicate similar generation rates for these two wastes. Therefore, I confirmed the facility was a LQG of hazardous waste and inspected the facility as such.

Universal wastes are shipped off site for recycling using pre-paid shipping containers. Approximately two containers are shipped per year. Based on the quantities of universal waste lamps and batteries accumulated onsite between shipments, I determined that Mission is operating below the small quantity handler (SQH) accumulation threshold of 5,000 kilograms (11,000 pounds) of universal waste onsite at any time. Therefore, I inspected Mission as a SQH of universal waste. I also inspected Mission as a used oil generator.

3. Waste Streams

This section of the CEI report describes the waste streams generated by the facility, including the facility's waste determination and waste codes, generation process and rate, management at the facility, and ultimate disposition. The following discussion of waste streams is based on conversations with facility representatives, the visual inspection, and my review of waste shipping documents. Ms. Scardino and Mr. Cardott accompanied me during the visual inspection. Mr. Dillon participated in the CEI during inspection of the paint booth and paint kitchen. All inspection participants were provided a copy of U.S. Federal Codes 1001 and 1002, which they read.

WPRM consists of spent methyl isobutyl ketone or acetone solvent mixed with paint, generated during cleaning of painting equipment in the paint kitchen. WPRM also includes mixed paint that cannot be used. The facility considers WPRM hazardous (D001, D007, D018, D035, F003, F005) based on product and process knowledge. During the inspection, I reviewed the SDS for the most common paint (823-707 Base Component) and noted no constituents that would add other characteristic or listed waste codes to the WPRM. Copies of the SDSs for 823-707 Base Component and methyl isobutyl ketone (4-methyl-2-pentanone) are included as Attachments 10 and 11. Based on the 2021 Biennial Report (Attachment 9, Page 4), the facility generates approximately 453 pounds (206 kg) per month. The waste is accumulated in 55-gallon SACs and full SACs are transferred to the HWCAA. The waste is collected by Tradebe Transport and transported to Tradebe Treatment and Recycling in East Chicago, Indiana, for fuel blending.

During the CEI, I observed a 55-gallon SAC of WPRM in the paint kitchen (Attachment 7, Photographs 1 and 2). The SAC was labeled with the words "hazardous waste," and held approximately 40 gallons of waste. The SAC was not closed, as required by 40 CFR 262.15(a)(4) (**NOPF No. 1**), and was not labeled with an indication of the nature of the hazard, as required by 40 CFR 262.15(a)(5)(ii) (**NOPF No. 2**).

I provided compliance assistance regarding management of SACs during the CEI. During the CEI, Mission employees closed the SAC and affixed labeling indicating the nature of the hazard (Attachment 7, Photograph 26).

Spent Solvent consists of used liquid solvents generated during cleaning of metal and electronic parts, including spent methyl ethyl ketone (MEK), acetone, and isopropyl alcohol. The facility considers spent solvent hazardous (D001, D035, F003, F005) based on product and process knowledge. The waste is generated when cleaning solvents are deemed to be too contaminated for continued use. Based on review of manifests and the 2021 Biennial Report (Attachment 9, Page 10) the facility generates approximately 1,267 pounds (57 kg) of spent solvent per month. The waste is collected by Tradebe Transport and transported to Tradebe Treatment and Recycling in East Chicago, Indiana, for fuel blending. Mission last shipped hazardous waste on May 9, 2023, including four 55-gallon HWACs of spent solvent. I did not observe spent solvent in accumulation at the time of the CEI.

Paint Booth Filters are generated during semiannual maintenance of the paint booth. The facility considers used paint booth filters hazardous (D007) based on product and process knowledge. Based on the 2021 Biennial Report (Attachment 9, Page 4) the facility generates approximately 646 pounds (294 kg.) of paint booth filters every six months. The waste is collected by Clean Harbors and transported to Clean Harbors in Kimball, Nebraska, for bulking and offsite transfer. I did not observe used paint booth filters in accumulation during the CEI.

Paint Debris consists of used PPE, masking, wipes, and any other solid material that has come into contact with paint or solvents, which include MEK, acetone, and isopropyl alcohol. The facility considers PD hazardous waste (D007, D035, F003, and F005) based on product and process knowledge. Based on the 2021 Biennial Report (Attachment 9, Page 6) Mission generates approximately 1,644 pounds (747 kg.) of PD per month. The waste is collected by Tradebe Transport and transported to Tradebe Treatment and Recycling in East Chicago, Indiana, for fuel blending.

During the CEI, I observed 12 SACs of PD in manufacturing areas around the facility. The SACs were all 5-gallon metal or plastic containers with self-closing lids (Attachment 7, Photograph 3). According to Ms. Scardino, almost all workbenches in the assembly areas and R&D laboratories have an associated SAC. She explained that a member of the environmental staff collects PD from the SACs each day. The SACs are emptied into a container on a cart and immediately taken to the HWCAA to be consolidated in a HWAC.

Each of the 5-gallon SACs I observed was at or near the point of generation, under control of the operator, structurally sound, closed, and labeled with the words “hazardous waste.” One SAC in the sub-assembly area was not labeled with an indication of the nature of the hazard, as required by 40 CFR 262.15(a)(5)(ii) (**NOPF No. 2**) (Attachment 7, Photographs 4 and 5). All other SACs I observed were labeled with an indication of the nature of the hazard.

I provided compliance assistance regarding management of SACs during the CEI. During the CEI, Mission employees affixed labeling to the SAC indicating the nature of the hazard (Attachment 7, Photograph 25).

I observed five 55-gallon HWACs of PD in the HWCAA (Attachment 7, Photographs 9, 10, 12, 17, and 18). Each of the HWACs was structurally sound, closed, labeled with the words

“hazardous waste” and an indication of the nature of the hazard, and dated. The earliest accumulation start date was May 3, 2023.

Soldering debris is lead scrap generated during assembly in manufacturing areas and in the R&D laboratories. The facility considers soldering debris hazardous (D008) based on product and process knowledge. Based on the 2021 Biennial Report (Attachment 9, Page 11) Mission generates approximately seven pounds of soldering debris per month. The waste is transported to Tradebe Treatment and Recycling in East Chicago, Indiana, for bulking and offsite transfer.

During the CEI, I observed a SAC of soldering debris at the solder station (Attachment 7, Photographs 7 and 8). The 1-gallon SAC was at or near the point of generation, under the control of the operator, structurally sound, closed, labeled with the words “hazardous waste,” and labeled with an indication of the nature of the hazard.

Aerosol can residue is generated during the puncturing and draining of spent aerosol cans. The facility has determined that waste aerosol can residue is hazardous (D001, U117) based on product and process knowledge. The waste is collected in a 10-gallon SAC beneath an aerosol can puncturing unit in the HWCAA. Aerosol can residue is collected by Tradebe Transport and transported to Tradebe Treatment and Recycling in East Chicago, Indiana, for fuel blending

During the CEI, I observed the 10-gallon SAC of aerosol can residue in the HWCAA (Attachment 7, Photograph 11). The SAC was structurally sound, under the control of the operator, at or near the point of generation, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and held approximately 5 gallons of aerosol can residue. I noted no deficiencies with management of aerosol can residue during the CEI.

Aviation fuel is generated during cleanup of incidental spills at the refueling test bench. The facility has determined that aviation fuel is hazardous (D001) based on product and process knowledge. Based on the 2021 Biennial Report (Attachment 9, Page 10) Mission generated approximately 240 pounds (109 kg) of waste aviation fuel (including mop water) per month. The waste is collected by Tradebe Transport and transported to Tradebe Treatment and Recycling in East Chicago, Indiana, for fuel blending.

During the CEI, I observed a 5-gallon HWAC of aviation fuel in the HWCAA (Attachment 7, Photograph 13). The HWAC was structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and dated May 22, 2023. I noted no deficiencies with management of aviation fuel during the CEI.

Used oil is generated during routine maintenance of equipment, including compressors, pumps, and hydraulic equipment. The facility manages used oil per requirements of 40 CFR Part 279. According to Ms. Scardino, Mission generates approximately 50 gallons of used oil per month. Used oil is collected by Covanta Energy of Indianapolis in Indianapolis, Indiana, for recycling or fuel blending.

During the CEI, I observed a 55-gallon used oil storage container the HWCAA (Attachment 7, Photograph 16). The 55-gallon container appeared to be structurally sound and held

approximately 35 gallons of used oil. The used oil storage container was labeled with the words “used oil.” I noted no deficiencies with management of used oil during the CEI.

Wash basin waste is generated when fuel pods are rinsed with water before painting. The fuel pods are first filled with aviation fuel and tested for leaks and pressure. They are then drained and rinsed with a small amount of water. The facility considers wash basin waste (rinse water with residual aviation fuel) to be hazardous (D001) based on product and process knowledge. Wash basin waste is collected in HWACs upon generation and transferred to the HWCAA. The waste is collected by Tradebe Transport and transported to Tradebe Treatment and Recycling in East Chicago, Indiana, for fuel blending.

During the CEI, I observed a 5-gallon HWAC of wash basin waste in the HWCAA (Attachment 7, Photograph 15). The HWAC was structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and dated May 17, 2023. I noted no deficiencies with management of wash basin waste during the CEI.

Waste lamps are generated by maintenance personnel replacing spent lamps. The facility manages waste lamps as universal waste according to provisions of 40 CFR Part 273. Waste lamps are accumulated in universal waste accumulation containers in the oil house. Based on interviews, the facility generates approximately five waste lamps per month. The waste is shipped off site using pre-paid Recycle-Pac containers to Veolia Environmental Services in Port Washington, Wisconsin, for recycling. Mission ships approximately two containers per year.

During the CEI, I observed one 4-foot universal waste lamps accumulation container and one 8-foot universal waste lamps accumulation container in the oil house. The 4-foot container was structurally sound, closed, labeled with the words “universal waste lamps,” and marked with an accumulation start date of September 16, 2022 (Attachment 7, Photographs 22 and 23). The 8-foot container was structurally sound, labeled with the words “universal waste lamps,” closed, and marked with an accumulation start date of January 27, 2022 (Attachment 24). Based on this date, the facility had accumulated universal waste lamps longer than one year, as prohibited by 40 CFR 273.15(a) (**NOPF No. 3**). I provided compliance assistance regarding management of universal waste lamps during the CEI.

Excluded solvent-contaminated wipes are generated throughout the facility during wipe-down cleaning of equipment and machinery. During wipe-down cleaning, wipes can be contaminated with acetone, isopropyl alcohol, or methyl propyl ketone. The facility manages excluded solvent-contaminated wipes according to the exemption in 40 CFR 261.4(b)(18). The excluded solvent-contaminated wipes (ESCW) containers are all 5-gallon containers with a self-closing lid. According to Ms. Scardino, a member of the environmental staff collects ESCW daily for consolidation in a 55-gallon ESCW container in the oil house. ESCW are collected by Tradebe Transport and transported to Tradebe Treatment and Recycling in East Chicago, Indiana, for fuel blending.

During the CEI, I observed several 5-gallon ESCW containers in manufacturing areas throughout the facility (Attachment 7, Photograph 6). I also observed the 55-gallon ESCW container in the oil house (Attachment 7, Photograph 21). All ESCW containers I observed were structurally

sound, closed, labeled with the words “excluded solvent contaminated wipes.” I did not observe free liquids in the 5-gallon containers, and the 55-gallon container was marked with an accumulation start date of May 10, 2023. I asked Mr. Cardott if the facility has written instructions on how to manage free liquids in the ESCW containers. He stated that a written policy is in place to transfer the contents of the ESCW container (wipes and free liquid) to a PD HWAC for management as hazardous waste upon discovery of any free liquid. I noted no deficiencies with management of ESCW during the CEI.

General trash consists of office-type refuse, such as waste packaging materials and food containers. The facility has determined that general trash is nonhazardous based on product and process knowledge. General trash is accumulated in several containers throughout the facility and transferred to a 4-cubic-yard roll-off container or compactor. General trash is collected by Waste Management for disposal at the Scott County landfill. During the CEI, I observed accumulation of general trash and noted no deficiencies.

4. Required Response Equipment and Hazard Management

Per 40 CFR 262.15(a)(8) and 262.17(a)(6), a LQG must operate to minimize the possibility of a fire, explosion, or spill, and must maintain emergency response equipment. During the visual inspection, I observed spill response equipment comprised of mats, absorbent materials, shovels, and brooms, as well as the presence and availability of fire extinguishers. I determined that the spill and fire response equipment was adequate for the hazardous wastes generated and accumulated at the facility.

5. Container Accumulation Areas

Mission maintains one HWCAA at the oil house. Mr. Moore participated in the CEI during inspection of the HWCAA. Mr. Moore is the employee who collects PD and ESCW from manufacturing areas daily for consolidation at the HWCAA. During the CEI, I observed seven HWACs in the HWCAA (Attachment 7, Photographs 9, 10, 12 through 15, 17, 18, and 21). The HWACs held PD, aviation fuel, and wash basin waste. All HWACs were structurally sound, closed, labeled with the words “hazardous waste” and an indication of the nature of the hazard, and dated. The earliest accumulation start date was May 3, 2023.

I asked Ms. Scardino if the HWCAA is inspected. She stated that the HWCAA is inspected each week and inspections are documented in an inspection log. I reviewed the inspection log and noted no weeks where an inspection was not performed. A copy of the HWCAA inspection log for the week of May 15, 2023, is included as Attachment 12. I asked Ms. Scardino how someone would summon emergency assistance in the HWCAA. She stated that all of the workers that handle hazardous waste carry two-way radios.

6. Manifests and Biennial Report

Mission generated manifests for 36 hazardous waste shipments from May 23, 2020, to May 23, 2023. During the CEI, I reviewed manifests and LDR notifications for five shipments in 2020, five in 2021, five in 2022, and four in 2023. A copy of the manifest and LDR for a shipment dated April 11, 2023, is included as Attachment 13. The facility submitted its 2021 Biennial

Report on February 17, 2022 (Attachment 9). I noted no deficiencies during my review of manifests, LDR notifications, and the Biennial Report.

7. Preparedness and Prevention Plan

LQG facilities are required by 40 CFR 262.17(a)(6) to meet emergency preparedness, prevention, and procedures requirements including documented arrangements with response agencies. According to Ms. Scardino, Mission is the subject of a regular inspection by the Davenport Fire Department hazardous materials team. She explained the fire department is shown the layout of the facility, the location of the hazardous waste HWCAAs, and other facility features during inspections.

The facility's Contingency Plan was last updated February 9, 2023. I reviewed the Contingency Plan against the content requirements of 40 CFR 262.261. I noted the Contingency Plan included a description of actions needed to respond to fires, explosions, and spills, a description of arrangements with the local emergency agencies, a list of emergency response equipment (including capabilities and location), and a complete evacuation plan with a description of the signals used, as required by 40 CFR 262.17(a)(6) Referencing 262.261(a, c, e, and f). The Contingency Plan included telephone numbers of the primary emergency coordinator, Ms. Scardino, and the alternate emergency coordinators, as required by 40 CFR 262.17(a)(6) Referencing 262.261(d). It also included a Quick Reference Guide, as required by 40 CFR 262.17(a)(6) Referencing 262.262(b). A copy of the Quick Reference Guide is included as Attachment 14. I noted no deficiencies with the facility's emergency preparedness, prevention, and procedures during the CEI, including content of the Contingency Plan.

8. Personnel Training Requirements

Personnel training is required by LQG regulations specified in 40 CFR 262.17(a)(7) to ensure that employees are thoroughly familiar with proper waste handling procedures relevant to their responsibilities. During the CEI, I asked Ms. Scardino if hazardous waste training is provided to employees. She stated that hazardous waste management training is provided to all employees who handle hazardous waste within six months of hiring or being assigned to a job that handles hazardous waste. She also stated that annual refresher training is provided. I asked Ms. Scardino who conducts the training. She stated that all training is conducted online through Lion Technology or in-person, led by Mr. Cardott. I reviewed the training records for the last three years for Messes. Scardino and Seville, and Messrs. Cardott and Dillon (painter), and noted no gaps in training. I also reviewed the October 2022 training record for Mr. Moore (millwright who collects hazardous waste from SACs). According to Ms. Scardino, Mr. Moore started at the millwright position in the HWCAA in November 2022. Copies of select training records for Messes. Scardino and Seville, and Messrs. Cardott and Moore are included in Attachment 15.

I reviewed the written job descriptions for Messes Scardino and Seville, and Messrs. Cardott and Moore, and noted that the job descriptions appeared to meet requirements of 40 CFR 262.17(a)(7)(iv). A copy of the job description for the millwright position is included as Attachment 16.

9. Air 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 specified 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. Mission 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. Mission 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 with organic compounds (VOC) concentration that exceeds 500 ppmw. The Subpart CC standards are applicable because the facility accumulates hazardous waste that contains VOCs in 55-gallon hazardous waste accumulation containers. During the CEI, I determined that Mission meets the Subpart CC requirements for containers by using Container Level 1 controls (hazardous waste accumulation containers smaller than 122 gallons that are Department of Transportation [DOT]-approved). I noted no concerns with management of hazardous waste per the Subpart CC air emissions requirements.

10. Summary of Preliminary Findings

In summary, as part of the CEI, I made the following preliminary findings:

- (1) Failure to keep a SAC closed except when adding waste as required by 40 CFR 262.15(a)(4) (**NOPF No. 1**)
- (2) Failure to label a SAC with an indication of the nature of the hazard as required by 40 CFR 262.15(a)(5)(ii) (**NOPF No. 2**)
- (3) Accumulation of universal waste lamps longer than one year, as prohibited by 40 CFR 273.15(a) (**NOPF No. 3**)

NOPF Nos. 1 and 2 were repeated from the previous inspection.

Other than items specifically noted in the narrative, I observed no additional issues. However, further review by EPA may change or add to my findings.

Clifford A.
Nelles

Digitally signed by Clifford
A. Nelles
Date: 2023.07.12
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Date: _____

Clifford A. Nelles, Inspector
CLAENE Group

KEVIN
SNOWDEN

Digitally signed by KEVIN
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Date: 2023.07.14
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Date: _____

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

Attachments:

1. Notification/Acknowledgement Verification Report (1 page)
2. Receipt for Documents and Samples (1 page)
3. Confidentiality Notice (1 page)
4. Notice of Preliminary Findings (1 page)
5. Site Map (1 page)
6. Google Earth Aerial Photograph (1 page)
7. Photographic Documentation (Photolog and 26 Photographs) (17 pages)
8. Copy of List of Waste Streams (3 pages)
9. Copy of 2021 Biennial Report (11 pages)
10. Copy of SDS for 823-707 Base Component (19 pages)
11. Copy of SDS for 4-Methyl-2-pentanone (11 pages)
12. Copy of Inspection Log dated May 18, 2023 (1 page)
13. Copy of Manifests and LDR for Shipment Dated April 11, 2023 (3 pages)
14. Copy of Quick Reference Guide (12 pages)
15. Copies of Select Training Records for Chadwick Cardott, Susan Seville, Ingrid Scardino, and Joe Moore (4 pages)
16. Copy of Job Description for Millwright (2 pages)