**Master Environmental Audit Matrix**

| **Facility** | **Condition** | **Regulatory Standard** | **Corrective Action To Be Taken** | **Audit Date** | **Auditor** |
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| **Air Quality – Chapter I Subchapter C – Air Programs (40 CFR 50-98)** | | | | | |
| Hillsboro | A current potential-to-emit (PTE) calculation could not be retrieved. | Recommendation  K.A.R. 28-19-300 | Ensure a PTE calculation is available, current, and that all emission units are accounted for. A newer spray booth might potentially be put in facility in the near future and a PTE calculation would be done at this time as well. | 6-17-21 | Curtis |
| Global Parts | A spray booth is currently in operation and an emergency generator is being installed soon. A current potential-to-emit (PTE) calculation could not be retrieved for an air permitting determination. | Recommendation  K.A.R. 28-19-300 | Although the buildings have few air emission units that are regulated for air permitting, a PTE calculation should be maintained that is available, current, and that all emission units are accounted for to validate air emissions are below permitting thresholds and no other permitting rules are overlooked. | 8-19-21 | Curtis |
| USD259 | Several paint booths, boilers, and generators were observed throughout the facility. | K.A.R. 28-19-500 | At a minimum a potential-to-emit calculation should be completed in order to determine if the facility is a source for air emissions that would require an air permit. | 7-30-18 | Amanda |
| Hillsboro | A paint booth, boiler, and dust collection system were observed at the facility. A current potential-to-emit (PTE) calculation could not be retrieved. It was observed that the boiler was not listed within the permit. | K.A.R. 28-19-301 | Ensure the PTE calculation is available, current, and that all emission units are accounted for. | 7-10-19 | Bria |
| Pet-Ag | A current potential-to-emit (PTE) calculation could not be retrieved for an air permitting determination. The facility has minimal air emission sources such as dry ingredient blending and miscellaneous natural gas sources but formal documented justification should be completed. | Recommendation  35 IAC 201 | Although the building has few air emission units that are regulated for air permitting, a PTE calculation should be maintained that is available, current, and that all emission units are accounted for to validate air emissions are below permitting thresholds and no other permitting rules are overlooked. | 9-14-21 | Curtis |
| Learjet – Fort Lauderdale |  |  |  | October 2017 | Golder |
| Learjet – Bridgeport, WV |  | 40 CFR 60.4243(a)(1), 60.4245(a)(2) and (b), adopted by reference at 45 CSR 16-1.1 |  | April 2018 | Golder |
| Learjet – Hartford | Painter training and certification records related to the Paint Stripping and Miscellaneous Surface Coating Operations NESHAP (subpart HHHHHH) were not available. | 40 CFR 63.11173(f) and 63.11177(a) |  | 2017 | Golder |
| Learjet – Wichita | Diesel and natural gas-fired generator run-time hours were logged by Maintenance, but there was no indication on the hour records of the reason for operation (emergency versus non-emergency). In addition, diesel fire pump run-times hours could possibly be calculated from hour meter notations on maintenance records but run-time hours along with the reason for operation (emergency versus non-emergency have not been recorded. | Kansas Class I Operating Permit, Source ID 1730052, Sections VI.H.1.k.iii, VI.I.1.f.ii, and VI.J.1.j.iii  40 CFR 63.6655(f) | Owners and operators of stationary reciprocating internal combustion engines (RICE) must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. | 2016 | Golder |
| Learjet – Wichita | Diesel and natural gas-fired emergency generator run-time hours were logged for emergency operation, but there were no records available of operating hours for testing and maintenance. | Kansas Class I Operating Permit, Source ID 1730052, Sections VI.H.1.k.iii, VI.I.1.f.ii, and VI.J.1.j.iii  40 CFR 63.6655(f) | Owners and operators of stationary reciprocating internal combustion engines (RICE) must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. | June 2019 | Golder |
| Learjet – Fort Lauderdale |  | 40 CFR 63.6655(f) |  | October 2017 | Golder |
| Learjet – Tucson, AZ |  | 40 CFR 63.6660  Air Quality Operating Permit 825, Part B, Section XI.B and XI.G |  | August 2017 | Golder |
| Learjet – Tucson, AZ | Records of corrective actions from boiler and process heater tune-ups were available for three units, but not for the other 10 units subject to the requirement | 40 CFR 63.7540(a)(10)  Air Quality Operating Permit 825, Part B, Section X.A.1 |  | 2017 | Golder |
| Learjet – Wichita | Maintenance is completed on natural gas-fired boilers and ovens, but the testing completed and records maintained do not include all the items required by the air permit and associated regulations. For example, no records of effluent carbon monoxide and oxygen concentrations were available. Compliant tune-ups were required by 1-31-13 for boiler 10 and 1-31-16 for all other boilers and process heaters (ovens). In addition, a Notification of Compliance Status Report is required within 60 days of initial tune-up. | 40 CFR 63.7495(b)  40 CFR 63.7500(a)(1)  40 CFR 63.7450  40 CFR 63.7510(e)  40 CFR 63.7530(e) and (f)  Kansas Class I Operating Permit, Source ID 17300052, Sections……. | An initial tune-up must be completed no later than 1-13-13 for boiler 10 and 1-31-16 for all other boilers and process heaters on-site. The tune-up must be completed as described at 40 CFR 63.7540(a)(10)(i)-(vi). A notification of compliance status report must be submitted within 60 days of the initial tune-up. | 2016 | Golder |
| CK Technologies – Brownsville, Texas | Painter training and certification records related to the Paint Stripping and Miscellaneous Surface Coating Operations NESHAP (Subpart HHHHHH) were not available. | 40 CFR 63.11173(f)  40 CFR 63.11177(a) | Each owner or operator of an affected miscellaneous surface coating source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in 63.11180, are trained in the proper application of surface coatings. Training must be completed within 180 days of new hire for certification. Training and certification is valid for a period not to exceed 5 years. Training must include both classroom instruction and hands-on instruction. (See Appendix B). | 3-2-21 | Curtis |
| CK Technologies – Brownsville, Texas | The site is subject to the NESHAP Subpart 6H, but did not have record for an initial notification of applicability for the facility and notification of compliance status to the EPA and TCEQ. | 40 CFR 63.11175 | All sources must submit an initial  notification to the EPA or to their State  or local air pollution control agency, if  the EPA has delegated authority for  implementing this rule to that agency,  with a copy sent to EPA, unless the EPA  regional office has waived the dual  reporting requirements.  New sources need to submit the initial notification no later than 180 days after initial startup, or no later than 180 days after the date of this notice, whichever is later. A notification of compliance must also be submitted and is meant to be included with the initial notification for new sources. (See Appendix C). | 3-2-21 | Curtis |
| Max | The site is subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) Subpart HHHHHH (6H), but did not have record for an initial notification of applicability for the facility and notification of compliance status to the Environmental Protection Agency (EPA) and Kansas Department of Health and Environment (KDHE). | 40 CFR 63.11175 | All sources must submit an initial notification to the EPA and KDHE. New sources need to submit the initial notification no later than 180 days after initial startup. Existing sources were to submit initial notification before 1-11-2010 and notification of compliance by 3-11-2011. | 11-24-21 | Curtis |
| Max | The site is subject to the NESHAP Subpart WWWWWW (6W), but did not have record for an initial notification of applicability for the facility and notification of compliance status to the EPA and KDHE. | 40 CFR 63.11509 | All sources must submit an initial notification and notification of compliance status to the EPA and KDHE upon start-up. Compliance date for existing sources was 7-1-2010 and new sources must submit upon start-up. | 11-24-21 | Curtis |
| Max | The site has not prepared an annual certification of compliance report for NESHAP Subpart 6W. | 40 CFR 63.11509(c) | Create an annual certificate of compliance report, which must be prepared no later than January 31 of the year immediately following the reporting period. These reports do not need to be submitted unless a deviation from the requirements occur. | 11-24-21 | Curtis |
| USD259 | Several old refrigerators were observed outside (photo 35). | 40 CFR 82 Subpart A, B, E, F and G | The facility is required to keep a record of all paperwork relevant to the applicable requirements, including but not limited to; servicing of motor vehicle air conditioners, labeling of products using ozone-depleting substances, warning statement requirements, recycling and emission reduction, technician certification, reporting and recordkeeping requirements. | 7-30-18 | Amanda |
| Learjet – Wichita | The site has refrigerant-containing devices, such as chillers, that have a full-charge capacity greater than 50 pounds of refrigerant. Leaks have occurred on some of the equipment, but annual leak rate calculations have not been documented to determine the timeframe in which leaks must be repaired. Documentation of time to repair leaks was also not available so verification of compliance with the leak repair standard cannot be verified. | 40 CFR 82.156(i)(1) | Owners/operators of refrigeration and air-conditioning equipment with refrigerant charges greater than 50 pounds are required to repair leaks within 30 days when those leaks would release 35% or more of the charge over a year (projected on a 12-month basis). To track leak rates, the facility must keep servicing and quantity of refrigerant added to the equipment. | 2016 | Golder |
| Learjet – Wichita | The site has refrigerant-containing devices, such as chillers, that have a full-charge capacity greater than 50 pounds of refrigerant. Work order records were available for maintenance and servicing of the equipment, including for refrigerant leaks that have occurred. However, the records did not include all of the information required by the regulation. Specifically, the maintenance records did not include:  - The full charge of the appliance  - The leak rate and the method used to determine the leak rate | 40 CFR 82.157 | Owners or operators must maintain a record including the following information for each time an appliance with a full charge of 50 or more pounds is maintained, serviced, repaired, or disposed of, when applicable:  - The identity and location of the appliance;  - The date of the maintenance, service, repair, or disposal performed  - The part(s) of the appliance being maintained, serviced, repaired, or disposed  - The type of maintenance, service, repair, or disposal performed for each part  - The name of the person performing the maintenance, service, repair, or disposal  - The amount and type of refrigerant added to, or in the case of disposal removed from, the appliance  - The full charge of the appliance  - The leak rate and the method used to determine the leak rate | June  2019 | Golder |
| Learjet – Hartford | Certification records were not available for employees completing work on refrigerant-containing equipment. | 40 CFR 82.161(a)(1) and (a)(4)(i) |  | 2017 | Golder |
| Learjet – Dallas | The site has refrigerant recovery equipment that is occasionally used by employees for work on aircraft air conditioning units. Certification records were not available for two employees who may do refrigerant-related work | 40 CFR 82.161(a)(1) and (4) | Any person who could be reasonably expected to isolate the integrity of the refrigerant circuit during the maintenance, service, repair, or disposal of appliances containing a class I or class II refrigerant or a non-exempt substitute refrigerant must pass a certification exam offered by an approved technician certification program.  Technicians certified under this section must keep a copy of their certificate at their place of business. Technicians must maintain a copy of their certificate until three years after no longer operating as a technician. | Sept 2019 | Golder |
| Excel Industries | The facility maintains a natural gas-fired emergency generator on site; however, no notification to KDHE has taken place. The facility is subject to NESHAP 4Z, as well as NSPS 4J. |  | Complete the necessary forms and notify KDHE of the emergency generator. Also, ensure the following management practices and recordkeeping are being followed:  1) Changing oil and filter every 500 hours of operation or annually, whichever comes first, or conduct an oil analysis;  2) Inspecting air cleaner every 1,000 hours of operation or annually, whichever comes first;  3) Inspecting all hoses and belts every 500 hours of operation or annually, whichever comes first;  4) Must develop maintenance plan that specifies management practices will be met and records proving they are being completed; and,  5) Must maintain records of hours of operation. Required to install non re-settable hour meter on engine. | 10-27-16 | Nikki |
| FACC | No PTE evaluation was conducted, nor was the required construction approval/permit application submitted to KDHE prior to installation of the paint booth, blast booth, and oven. |  | iSi recommends conducting a PTE evaluation, as well as submitting the required construction approval/permit for the paint booth, blast booth, and oven. If a dust collection unit is still going to be installed, this should be included in the construction approval/permit submittal, as well as the applicability to 40 CFR Part 63 Subpart HHHHHH. | 2-9-15 | Nikki |
| FACC | No notifications have been submitted to KDHE or EPA related to 40 CFR Part 63 Subpart HHHHHH. |  | Notifications required under 40 CFR Part 63 Subpart HHHHHH should be submitted to both KDHE and EPA as soon as possible. iSi recommends submitting the notification along with the construction approval/permit application to KDHE. Please note that a copy of the notification only will need to be submitted to EPA as well. | 2-9-15 | Nikki |
| FACC | No painter training/certification has been completed. |  | Ensure all painters are trained/certified in both classroom and hands-on within 180 days, as required. Painters must also be re-certified in both classroom and hands-on every 5 years. | 2-9-15 | Nikki |
| FACC | HVLP spray guns are being utilized; however, no spray gun specifications or spray booth filter specifications were on file. |  | Ensure specifications for both spray guns and spray booth filters are maintained on file. Spray guns must be HVLP or equivalent and spray booth filters must be at least 98% efficient. | 2-9-15 | Nikki |
| Learjet – Wichita | Records of opacity assessments were not available prior to November 2015 or after January 2016 | Kansas Class I Operating Permit, Source ID 17300052, Section IX | Qualitative assessments of opacity must be completed at least once per calendar month, with at least one week between assessments. The assessments shall include each activity at the facility operating at the time of the assessment. | 2016 | Golder |
| Learjet Wichita | Records of opacity assessments were not available for September 2018. | Kansas Class I Operating Permit, Source ID 1730052,  July 11, 2018 revision,  Section IX | Qualitative assessments of opacity must be completed at least once per calendar month, with at least one week between assessments. The assessments shall include each activity at the facility operating at the time of the assessment. | June 2019 | Golder |
| Learjet Wichita | In the annual Class I Operating Permit compliance certification for 2016, the site identified non-compliance with 40 CFR 63 Subpart DDDDD for boilers and process heaters but listed no other non-compliances. The 2016 Legal Compliance Audit identified three other non-compliances related to compliance with permit and regulatory requirements for emergency engines, opacity monitoring, and refrigerants management. The additional non-compliances were not identified in the compliance certification as required.  Similarly, the January through June 2016 semiannual report submitted on July 26, 2016 only identified the boiler and process heater non-compliance. The non-compliances related to emergency engines and opacity monitoring (conditions subject to semiannual reporting) identified during the 2016 Legal Compliance Audit were not identified in the semiannual report. | Kansas Class I Operating Permit, Source ID 1730052,  July 11, 2018 revision,  Section XIV.G | Annual Certification  The permittee shall annually submit to the Air Compliance and Enforcement Section of the KDHE, and a copy to the Air Permitting and Compliance Branch of the U.S. EPA, Region VII, a certification of compliance.  The certification shall include the permit term or condition that is the basis of the certification; the current compliance status; whether compliance was continuous or intermittent; the method or methods used for determining the compliance, currently and over the reporting; and such other facts as the KDHE may require to determine the compliance status of the source.  Semi-Annual Reports  Summary reports of any routine, continuous, or periodic monitoring must continue to be submitted at six-month intervals for the duration of the permit. All instances of deviations from permit requirements, including perceived opacity exceedances, shall be clearly identified in the report. All reports shall be certified by a responsible official. | June 2019 | Golder |
| Learjet – Bridgeport WV |  | Air Emissions Permits R13-2236B, Section 4.3.4 |  | April 2018 | Golder |
| Learjet – Dallas | The site has one diesel-powered emergency generator (288 HP) and three diesel-powered fire pumps (275 HP each). Records were not available to demonstrate that the site had registered for coverage under the Texas Stationary Engines and Turbines Permit-by-Rule | 30 TAC 106.512(1) | The facility shall be registered by submitting the commission’s Form PI-7, Table 29 for each proposed reciprocating engine to the commission’s Office of Permitting, Remediation, and Registration in Austin within 10 days after construction begins. Engines and turbines rated less than 240 HP need not be registered, but must meet paragraphs (5) and (6) of this section, relating to fuel and protection of air quality. | September  2019 | Golder |
| CK Technologies – Brownsville, Texas | Quarterly records of opacity assessments were not being completed. | Texas Commission on Environmental Quality Air Permit 135418, revision November 30, 2018, Section 5(B) | Qualitative assessments of opacity must be completed at least once per quarter. The assessments shall include each listed emission point at the facility operating at the time of the assessment. | 3-2-21 | Curtis |
| CK Technologies – Brownsville, Texas | The differential pressure gauge drop readings are not being recorded on a daily basis when the coating booths are in use. | Texas Commission on Environmental Quality Air Permit 135418, revision November 30, 2018, Section 10(E) | Record the pressure drop readings at last once per day when the system is required to be operated. | 3-2-21 | Curtis |
| CK Technologies – Brownsville, Texas | There was not evidence that a quarterly accuracy audit is being completed on the thermal oxidizer. | Texas Commission on Environmental Quality Air Permit 135418, revision November 30, 2018, Section 13(C) | Begin completing and documenting a quarterly accuracy audit to validate the temperature sensors are accurate to within ± 5°F. | 3-2-21 | Curtis |
| CK Technologies – Brownsville, Texas | Operating instructions to the thermal oxidizer are available to operators but not in immediate work area. | Recommendation  Texas Commission on Environmental Quality Air Permit 135418, revision November 30, 2018, Section 13(E) | Suggestion to place operating instructions / manual immediately available in area for thermal control device operators. | 3-2-21 | Curtis |
| CK Technologies – Brownsville, Texas | A monthly audio, visual, and olfactory (AVO) inspection of the thermal oxidizer capture system is not being completed. | Texas Commission on Environmental Quality Air Permit 135418, revision November 30, 2018, Section 13(G) | Begin completing and documenting a monthly inspection of the capture system to check for leaking components. The inspection requirement is meant to ensure the capture system is working efficiently. | 3-2-21 | Curtis |
| CK Technologies – Brownsville, Texas | The hours of operation for the combustion equipment is limited to 7488 hours per year, but no direct documented evidence is immediately available to demonstrate this requirement. | Texas Commission on Environmental Quality Air Permit 135418, revision November 30, 2018, Section 16 | Create a document or other formal system to show that the combustion equipment is not exceeding this operational limitation and make readily available if inspected by EPA or TCEQ. | 3-2-21 | Curtis |
| Learjet – Tucson, AZ | Acceptable pressure drop readings are posted near booths used for sanding, but the acceptable limits are not listed on the paper logs or in the ERA system as is required by the permit. | Air Quality Operating Permits 825, Part B, Section II.E.2 | The permittee shall record the actual pressure drop across the particulate filters once each shift in which the depainting process is in operation. This log shall include the acceptable limit(s) of the pressure drop as specified by the filter manufacturer or in locally prepared operating procedures. | August 2017 | Golder |
| Learjet – Tucson, AZ | Stationary rotating machinery exhaust stack opacity records were available for 2016 and 2017 but not for previous years 2013-2015 | Air Quality Operating Permit 825, Part B, Section XII.E.2 | For each opacity check conducted pursuant to D.2 of this section (monitoring for Opacity Emissions Standards), the Permittee shall record the date and time of the check, the name of the person conducting the check, the results of the check, and the type of corrective action taken (if required). All records shall be maintained for 5 years. | August 2017 | Golder |
| Cascade Engineering – Grand Rapids, MI Part 1 | A current potential-to-emit (PTE) calculation could not be retrieved. | Recommendation | Although the facilities have few air emission units that are regulated for air permitting, a PTE calculation should be maintained that is available, current, and that all emission units are accounted for to validate air emissions are below permitting thresholds and no other permitting rules are overlooked. | 2-18-21 | Curtis |
| Hillsboro | Greenhouse gas (GHG) applicability determination was not on file. | Recommendation | iSi recommends conducting GHG calculations in order to determine the actual CO2e emissions from combustion equipment. | 7-10-19 | Bria |
| CK Technologies – Brownsville, Texas | Greenhouse gas (GHG) applicability determination was not on file. | Recommendation  40 CFR 98 | iSi recommends conducting GHG calculations in order to determine the actual CO2e emissions from combustion equipment. The threshold limit is 25,000 metric tons of CO2e per year. The facility is assumed to be below the threshold if the maximum-rated heat-input capacity for all stationary fuel combustion equipment combined is less than 30 million British thermal units (MMBtu) per hour. | 3-2-21 | Curtis |
| CK Technologies – Mount Airy, North Carolina | Greenhouse gas (GHG) applicability determination was not on file. | Recommendation  40 CFR 98 | iSi recommends conducting GHG calculations in order to determine the actual CO2e emissions from combustion equipment. The threshold limit is 25,000 metric tons of CO2e per year. The facility is assumed to be below the threshold if the maximum-rated heat-input capacity for all stationary fuel combustion equipment combined is less than 30 million British thermal units (MMBtu) per hour. | 4-14-21 | Curtis |
| Hillsboro | Greenhouse gas (GHG) applicability determination was not on file. | Recommendation  40 CFR 98 | iSi recommends conducting GHG calculations in order to determine the actual CO2e emissions from combustion equipment. The threshold limit is 25,000 metric tons of CO2e per year. The facility is assumed to be below the threshold if the maximum-rated heat-input capacity for all stationary fuel combustion equipment combined is less than 30 million British thermal units (MMBtu) per hour. | 6-17-21 | Curtis |
| Ultra Clean Midwest | At the time of the audit, a current potential-to-emit (PTE) calculation could not be retrieved. An evaluation against any applicable National Emission Standards for Hazardous Air Pollutants (NESHAP) subparts needs to be evaluated as well. | Recommendation  10 CSR 10-6  40 CFR 63 Subpart N  40 CFR 63 Subpart WWWWWW (6W) | Ensure a PTE calculation is available, current, and that all emission units are accounted for. Evaluate the facility processes against any applicable NESHAP standards such as Subparts N (chromium electroplating) and WWWWWW (6W) (plating and polishing operations). | 12-8-21 | Curtis |
| **Spill Prevention Control and Countermeasures (SPCC) – Chapter I Subchapter D – Water Programs (40 CFR 112) Oil Pollution Prevention** | | | | | |
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| USD259 | A Spill Prevention Control and Countermeasure (SPCC) plan was found on file in draft format but never was reviewed or signed by a Professional Engineer (P.E.). | 40 CFR 112 | Any facility that has 1,320 gallons of above ground storage or 42,000 gallons in underground storage must have a SPCC developed. The facility needs to re-evaluate the amount of petroleum or oil-like products that are stored on-site in aboveground tanks and underground tanks and have an updated plan developed and certified by a P.E. Monthly and annual inspection as well as annual training will be required once plan is developed. | Amanda | 7-30-18 |
| CK Technologies – Brownsville, Texas | The facility has a 1,000 gallon AST and a 300 gallon portable tank of hydraulic fluid. The facility also has four totes of oily wastewater that are used for storage prior to hauling off site for disposal that puts the facility over the limit of 1,320 gallons above ground oil storage capacity requiring a SPCC plan. | 40 CFR 112.1(b)  40 CFR 112.3  SPCC Guidance for Regional Inspectors, Revision 12-16-2013, Section 2.2.6 | Develop a SPCC Plan for the facility. Oil and water mixture containers are subject to the SPCC rule. A mixture of wastewater and oil is “oil” under the statutory and regulatory definition of the term. | 3-2-2021 | Curtis |
| CK Technologies – Mount Airy, North Carolina | The facility typically stores approximately twenty 55-gallon drums of solvents and oil based paints along with eight to nine 55-gallon drums of hazardous wastes that contain oil components. This puts the facility over the limit of 1,320 gallons for above ground oil storage capacity requiring a SPCC plan. | 40 CFR 112.1(b)  40 CFR 112.3  SPCC Guidance for Regional Inspectors, Revision 12-16-2013, Section 2.2.8 | Develop a SPCC Plan for the facility. Hazardous waste containers are subject to the SPCC rule. The definition of “oil” includes but is not limited to “oil mixed with wastes other than dredged spoil.” Oils covered under the SPCC rule include certain hazardous substances or hazardous wastes that are oils as well as certain hazardous substances or hazardous wastes that are mixed with oils. | 4-14-21 | Curtis |
| Pet-Ag | Vegetable oil containers are stored on the property in totes and 55-gallon drums, totaling approximately 12,000 gallons of total oil volume in inventory. Accounting for all these oil containers, Pet-Ag is storing oil in excess of 1,320 gallons aboveground oil storage. The facility is located within ¼ mile of an intermittent tributary to Coon Creek. The determination of reasonable expectation of discharge to a navigable water is based solely upon consideration of the geographical and location aspects of the facility and excludes consideration of manmade features such as dikes, equipment, or other structures, which may serve to restrain, hinder, contain, or otherwise prevent a discharge. Thus, the facility requires an SPCC plan. | 40 CFR 112.1(b)  40 CFR 112.3  SPCC Guidance for Regional Inspectors, Revision 12-16-2013, Section 2.6.2 | Develop a SPCC Plan for the facility that is certified by a Professional Engineer (PE). See Appendixes D and E. | 9-14-21 | Curtis |
| Max | The facility has numerous totes of metal working fluids (See Photo 9), 55-gallon drums of oil products (See Photo 10), and oil reservoirs in oil-filled operational equipment in the facility that puts the facility over the limit of 1,320 gallons above ground oil storage capacity requiring a SPCC plan. | 40 CFR 112.1(b)  40 CFR 112.3 | Complete a full inventory of oil containers that are 55-gallons and larger that are maintained on the property to calculate a total volume of oil storage. The total container capacity must be used, just not amount of liquid in the containers. Develop a SPCC Plan for the facility. If exceeding 10,000-gallons, develop a non-qualified SPCC plan that is certified by a Professional Engineer (P.E.). | 11-24-21 | Curtis |
| Learjet – Fort Lauderdale |  | 40 CFR 112.1(b)(2(ii) and 112.3 |  | October 2017 | Golder |
| Cascade Engineering, Montpelier, Ohio | The facility is using nine totes for oily wastewater storage that are not included in the SPCC plan (See Photo 1). | 40 CFR 112.1(b)  40 CFR 112.3  40 CFR 110.2  40 CFR 112.2  SPCC Guidance for Regional Inspectors, Revision 12-16-2013, Section 2.2.6 | Update the SPCC plan to include all totes used for storage of oily wastewater. Oil and water mixture containers are subject to the SPCC rule. A mixture of wastewater and oil is “oil” under the statutory and regulatory definition of the term. See Appendix H. | 12-16-21 | Curtis |
| BG Products | Suggestion to do additional review on oil containers in facilities. Many facilities can overlook less common oil containers in their inventory assessment. | Recommendation  40 CFR 112.1(b)  40 CFR 112.3 | Validate all oil inventory is accounted for by assessing:   * Hazardous waste drums containing oil or oil mixtures * Hydraulic oil reservoirs on elevators and trash compactors | 8-19-22 | Curtis |
| Cascade Engineering, Grand Rapids, MI | The Noble facility exceeds 10,000 gallons of oil storage onsite and the current revision of the SPCC plan covering the Noble facility is not certified by a licensed Professional Engineer (P.E.). | 40 CFR 112.3(d) | Have the SPCC plan reviewed and certified by a licensed Professional Engineer who attests:   1. He/she is familiar with the requirements of 40 CFR 112. 2. He/she or his/her agent visited and examined the facility. 3. The plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards. 4. Procedures for required inspections and testing have been established. 5. The plan is adequate for the facility. | 6-24-22 | Curtis |
| Atlas | The SPCC Plan is current as of October 2017; however, the Plan will need to be updated again due to continued equipment moves/additions. | 40 CFR part 112.5(a) | Once the equipment moves/additions are complete, iSi will update the Plan. | Bria | 5-9-18 |
| Learjet – Bridgeport, WV |  | 40 CFR 112.7, 112.20(e) and Appendix C to Part 112 |  | April 2018 | Golder |
| Learjet - Hartford | An elevator is located near the Stock Room. Based on information provided by the elevator service company, the hydraulic reservoir associated with the elevator has a capacity of 130 gallons. The reservoir is not included in the site's SPCC Plan. In addition, the SPCC Plan inventory does not include 115-gallon bowsers used to collect jet fuel (only describes 55-gallon portable containers). | 40 CFR 112.7(a)(3)(i) |  | 2017 | Golder |
| Learjet – Dallas | Based on measurements taken during the audit, the elevator hydraulic reservoir appears to have a capacity of approximately 142 gallons. The reservoir is not included in the site’s SPCC Plan. | 40 CFR 112.7(a)(3)  40 CFR 112.1(d)(5) | Describe in your Plan the physical layout of the facility and include a facility diagram, which must mark the location and contents of each fixed oil storage container and the storage area where mobile or portable containers are located.  SPCC plans must address containers 55 gallons in capacity and larger. | Sept 2019 | Golder |
| Cascade Engineering – Montpelier, Ohio | The SPCC plan dated 1-31-20 has a facility map provided but does not include a facility diagram with all the requirements including:   * Location of each oil storage container   Transfer stations | 40 CFR 112.7(a)(3)  SPCC Guidance for Regional Inspectors, Revision 12-16-2013, Section 6.4 | Update the facility map and mark the locations and contents of each fixed oil storage container and storage areas where mobile or portable containers are located. Recommended to show on the map the locations of all spill kits. See Appendix I. | 12-16-21 | Curtis |
| BG Products | The facility diagrams for both facilities are relatively compact in size due to covering large areas. The intent of the SPCC facility diagrams is to mark the location and contents of each fixed oil storage container, the storage area for mobile and portable containers, and the location of connecting piping and intra-facility gathering lines. The level of detail is at the discretion of the person certifying the SPCC Plan. The maps are also only in black and white, which makes seeing the important features on the diagram hard to see. | Recommendation  40 CFR 112.7(a)(3) | Suggestion to create a more focused facility diagram where:   * Individual oil containers can be uniquely identified * Mobile and portable are located * Connecting piping and intra-facility gathering lines can be included. Piping might still need to be reference in SPCC Plan on exact location of full detailed diagrams as this feature is usually hard to show in an SPCC plan.   Suggestion to leave facility structure in black font color, while using bright colors to mark important features required by the SPCC rule to allow easy viewing. | 8-19-22 | Curtis |
| Learjet – Hartford | The emergency contact list in the SPCC Plan was not up-to- date and included people no longer at the site. | 40 CFR 112.7(a)(3)(vi) |  | 2017 | Golder |
| Learjet – Wichita | No record of monthly SPCC inspections were available for September 2018. | 40 CFR 112.7(e)  Bombardier SPCC Plan,  June 21, 2018, Section 4.4.2 | Regulation  Conduct inspections and tests required by this part in accordance with written procedures that you or the certifying engineer develop for the facility. You must keep these written procedures and a record of the inspections and tests, signed by the appropriate supervisor or inspector, with the SPCC Plan for a period of three years.  SPCC Plan  The checklist in Appendix C [of the SPCC Plan] is used for monthly inspections by the Emergency Coordinator, or designee. Written monthly inspection records are signed by the Emergency Coordinator and maintained with this Plan for a period of three years. | June 2019 | Golder |
| Cascade Engineering – Montpelier, Ohio | Frequent visual inspections are being completed using the facility’s safety audit form and are not described in the SPCC plan. The SPCC plan must describe the inspections and tests required with written procedures. Inspection records must be kept for a period of 3 years. | 40 CFR 112.7(e);  40 CFR 112.8(c)(6) or  40 CFR 112.12(c)(6)  SPCC Guidance for Regional Inspectors, Revision 12-16-2013, Section 7.2.1 | Update the SPCC plan to include the appropriate written procedure for completing frequent visual inspections. The plan must provide an appropriate inspection form to use. Records of inspection must be kept for a period of 3 years. See Appendix J. | 12-16-21 | Curtis |
| BG Products | Facilities are currently completing three levels of frequent and periodic inspections;   * Monthly - equipment * Quarterly – tank vents and tank exterior   Annually – tank foundations and anchor bolts | Recommendation  40 CFR 112.7(e) | To reduce time needed to complete inspections, it might be possible to combined inspection requirements into fewer levels. | 8-19-22 | Curtis |
| BG Products | The facilities’ inspection checklists are not located within the SPCC Plan. | Recommendation  40 CFR 112.7(e) | Place a blank copy of all inspection forms into the SPCC Plan for better document control and review. | 8-19-22 | Curtis |
| Atlas | Annual training records for 2018 could not be located at the time of the audit. | 40 CFR part 112.7(f) | SPCC training is required annually for oil-handling personnel. Ensure training is conducted and documented. | Bria | 5-9-18 |
| Learjet – Bridgeport, WV |  | 40 CFR 112.7(e) and SPCC plan, 9/16/2018 revision, Section 4.7 |  | April 2018 | Golder |
| Perfekta | The facility maintains an SPCC plan but is not completing trainings to applicable employees as required. Employees that are considered oil-handling personnel are required to have initial training that covers operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and, the contents of the facility SPCC Plan. Annually thereafter, employees must be briefed to assure adequate understanding of the SPCC plan to describe known discharges, failures, malfunctioning components and any recently developed precautionary measures. | 40 CFR 112.7(f)(1)  40 CFR 112.7(f)(3) | Ensure all oil-handling personnel are adequately training initially and annually thereafter. | 7-27-22 | Curtis |
| BG Products | The facilities are completing initial SPCC trainings to applicable employees as required; however, not all required elements are covered. Employees that are considered oil-handling personnel are required to have initial training that covers:   * Operation and maintenance of equipment to prevent discharges, * Discharge procedure protocols, * Applicable pollution control laws, rules, and regulations, * General facility operations, and,   The contents of the facility SPCC Plan. | 40 CFR 112.7(f)(1) | Update training presentation to ensure all oil-handling personnel are adequately trained initially with all required content. | 8-19-22 | Curtis |
| Learjet – Hartford | Records of annual oil discharge briefings were not available for 2016. Records from 2015 and 2017 were available | 40 CFR 112.7(f)(3) |  | 2017 | Golder |
| BG Products | The facilities are not completing annual briefings (i.e. trainings) to applicable employees. After initial training, employees on an annual basis must be briefed:   * To assure adequate understanding of the SPCC plan, and,   To discuss known discharges, failures, malfunctioning components and any recently developed precautionary measures. | 40 CFR 112.7(f)(3) | Begin completing annual refresher briefings or trainings to applicable oil-handling employees at the facilities. | 8-19-22 | Curtis |
| BG Products | While the facility is using wheel chocks on tank trucks loading/unloading oil products, this is not stated in the SPCC plan. | 40 CFR 112.7(h)(2) | Add the required verbiage in the SPCC plan stating wheel chocks are required to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines. | 8-19-22 | Curtis |
| Learjet – Tucson, AZ | 55-gallon oil drums stored in the maintenance building were observed being stored without adequate containment | 40 CFR 112.8(c)(2)  Bombardier SPCC Plan, August 2016, Section 15.3.2 | Regulation – Construct all bulk storage tank installations (except mobile refuelers and other non-transportation related tank truck(s) so that you provide a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation.  SPCC Plan – The drums and totes are commonly located on fabricated steel spill pallets when positioned outside or on plastic spill pallets when positioned inside. | August 2017 | Golder |
| Learjet - Hartford | and Bombardier SPCC Plan, March 13, 2015, Section 5.2.3 According to site personnel interviewed, the capture tank at the fuel farm has been pumped out around three times. No records were available to document the drainage events. | 40 CFR 112.8(c)(3) |  | 2017 | Golder |
| Learjet – Dallas | The site’s SPCC Plan states that tank overfill alarms will be tested periodically and tanks will be subject to periodic integrity testing. No records were available to demonstrate that either type of testing had been completed. In addition, no specific periodic schedule for the testing was documented. | 40 CFR 112.8(c)(6)  Bombardier SPCC Plan, April 23, 2019, Table 2-10 | Regulation – Test or inspect each aboveground container for integrity on a regular schedule and whenever you make material repairs. You must determine, in accordance with industry standards, the appropriate qualifications for personnel performing tests and inspections, the frequency and type of testing and inspections, which take into account container size, configuration, and design.  SPCC Plan – Each above ground bulk container is tested or inspected for integrity on a regular schedule and whenever material repairs are made. Each of the four diesel tanks is equipped with an overfill alarm. This alarm is tested periodically to ensure proper operation. |  |  |
| Cascade Engineering, Grand Rapids, MI | The Noble facility has two 10,000-gallon hydraulic oil tanks but has not completed integrity testing and inspections on the tanks. | 40 CFR 112.8(c)(6) | Follow the current industry standards which are drafted by the Steel Tank Institute, the Inspection of Aboveground Storage Tanks, STI SP001 standard. Examples of these integrity tests include, but are not limited to: visual inspection, hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or other systems of non-destructive testing. | 6-24-22 | Curtis |
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| **Storm Water - Chapter I Subchapter D – Water Programs (40 CFR 122) National Pollutant Discharge Elimination System** | | | | | |
|  |  |  |  |  |  |
| Ultra Clean Midwest | The facility operates under North American Industry Classification System (NAICS) code 332813 which correlates to Standard Industrial Classification (SIC) 3471. SIC code 3471 is considered light manufacturing and discharge of industrial storm water is regulated. The facility does not maintain a permit or storm water pollution prevention plan (SWPPP). Current exposures on the property include storage of obsolete equipment (See Photo 1), propane cylinders (See Photo 2), transfer of industrial wastewater outside (See Photo 3) and transfer of other materials and products during loading/unloading activities. | 40 CFR 122.21  40 CFR 122.26  10 CSR 20-6.200 | Due to current exposures, the facility needs to obtain a storm water permit through Missouri DNR by submitting Form E - Application for General Permit Under Missouri Clean Water Law and develop a storm water pollution prevention plan (SWPPP).  The other option is to eliminate all sources of storm water exposure and submit a No Exposure Certification (NEC) to Missouri DNR. | 12-8-21 | Curtis |
| Learjet – Wichita | SWPPP training and SPCC plan training are delivered together. Based on completion reports from the site's training tracking system, completion rates for SPCC / SWPPP training in 2017 and 2018 were 80% and 83% respectively. | Kansas Storm Water General Permit S-ISWA-1611-1,  Section 2.4.3.e  Bombardier SWPPP,  June 21, 2018, Section 4.2.6  40 CFR 112.7(f)  Bombardier SPCC Plan,  June 21, 2018, Section 4.5 | NPDES Permit  Employee training programs must be described in the SWPPP and include informing personnel responsible for implementing activities identified in the SWPPP or otherwise responsible for storm water management of the components and goals of the SWPPP.  SWPPP  Employees working in areas where industrial materials or activities are exposed to storm water will receive refresher training annually. Those responsible for housekeeping and/or preventive maintenance will also receive appropriate pollution prevention training on an annual basis.  SPCC Regulation  Train your oil-handling personnel in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and, the contents of the facility SPCC Plan. Schedule and conduct discharge prevention briefings for your oil-handling personnel at least once a year to assure adequate understanding of the SPCC Plan for that facility.  SPCC Plan  Learjet, Inc. personnel involved in the handling, management, and/or transport of petroleum materials are trained on the operation of the facility. Each employee is given training on spill prevention, maintenance of equipment, release requirements, and the contents of the Plan. An annual refresher is given to reinforce the Plan and highlight any changes that were made or problems that were encountered in the previous year. Spill prevention briefings are held during the annual refresher training and during routine safety and departmental meetings. | June 2019 | Golder |
| Learjet – Bridgeport, WV |  | 40 CFR 112.7(f) and SPCC plan 9/16/2015 Revision, Section 5.0  47 CSR 58-4.11 and 58-4.12.1.a and Groundwater Protection Plan, 2/26/2018 revision, Section 10 |  | April 2018 | Golder |
| USD 259 | Abundance of material (scrap metal, drums, tanks, abandoned equipment, etc.) are stored outside. No notice of intent (NOI) and/or Storm Water Pollution Prevention Plan (SWP3) were found on file (photos 35-38, 41-44). | State of Kansas General Permit No. S-ISWA-1611-1 | Determine the facility’s primary SIC code in order to conclude if site is applicable to Storm Water requirements. If SWP3 is required, a NOI would have to be submitted to KDHE. Quarterly and annual inspections would be required, as well as annual training for applicable employees. | Amanda | 7-30-18 |
| Learjet – Fort Lauderdale |  |  |  | October 2017 | Golder |
| Learjet – Dallas | No records were available to demonstrate that the site had paid the annual water quality fee required by the storm water general permit. | Texas General Permit No. TXR050000, August 14, 2016, Part II, Section C.10.b | A facility authorized under this general permit and required to submit an NOI must pay an annual water quality fee of $200. | Sept 2019 | Golder |
| Learjet – Dallas | The storm water map for the site does not include all required elements. Specifically missing: Surface area, locations of receiving waters, location of non-storm water discharge, run-on from adjacent properties, locations of reportable spills | Texas General Permit No. TXR050000, August 14, 2016, Part III, Section A.3.d | A site map must be developed that depict(s) the following………..  The site map must clearly show the flow of storm water runoff from each of these locations so that the final outfall(s) where the discharge leaves the facility’s boundary is apparent | Sept 2019 | Golder |
| Learjet – Dallas | The compressed air receiver outside was observed discharging blowdown that appeared to be contaminated with oil. Only uncontaminated condensate and blowdown are allowed. | Texas General Permit No. TXR050000, August 14, 2016, Part II, Section A.6.f | Industrial facilities that qualify for coverage under this general permit may discharge the following non-stormwater discharges through outfalls identified in the SWPPP, according to the requirements of this general permit:  -Uncontaminated air conditioner condensate, compressor condensate, and steam condensate, and condensate from the outside storage of refrigerated gases or liquids. | Sept 2019 | Golder |
| Learjet – Dallas | Non-stormwater discharge certifications are completed quarterly. However, based on the records of visual inspections, the non-stormwater discharge evaluations are being completed during rain events. Non-stormwater discharge evaluations must be done during dry weather to be able to identify non-stormwater flows. In addition, the certifications are being signed by an employee who does not meet the signatory requirements of the permit | Texas General Permit No. TXR050000, August 14, 2016, Part III, Section B.1 |  | Sept 2019 | Golder |
| Learjet – Dallas | Quarterly site inspections are completed, but the weather conditions noted on the inspection records were “sunny” or “fair.” None were completed during a rain event. On inspection per year must be completed during a rain event. | Texas General Permit No. TXR050000, August 14, 2016, Part III, Section B.2 | Qualified personnel, who are familiar with the industrial activities performed at the facility, shall conduct periodic routine facility inspections to determine effectiveness of the Pollution Prevention Measures and Controls.  Inspections must be conducted at least once per quarter unless otherwise specified in Part V of this permit. If feasible, at least one of these routine facility inspections each calendar year must be conducted during a period when a storm water discharge is occuring. | Sept 2019 | Golder |
| Learjet – Dallas | No records of an annual storm water comprehensive site compliance inspection were available for 2018. | Texas General Permit No. TXR050000, August 14, 2016, Part III, Section B.5 | The comprehesive site compliance inspection must be conducted at least once each permit year by one or more qualified employees or designated resprentatives, including at least one member of the storm water pollution prevention team. | Sept 2019 | Golder |
| CK Technologies – Brownsville, Texas | The SWP3 does not include a list of non-stormwater discharges at the facility, as well as the results of a non-stormwater discharge evaluation. A certification must be provided as a result of the survey of non-stormwater sources. | Texas General Permit No. TXR050000, August 14, 2016, Part III, Section B.1 | The facility must complete a survey of non-stormwater discharges during dry weather conditions, include a list of non-stormwater discharges into the SWP3, and provide certification by the proper signatory authority of the facility. | 3-2-21 | Curtis |
| CK Technologies – Brownsville, Texas | The annual comprehensive site compliance inspection form is available by reference in the SWP3. | Recommendation  Texas General Permit No. TXR050000, August 14, 2016, Part III, Section B.5 | While the form is available, it would be best practice to place the form itself within the SWP3 for easy reference and access. | 3-2-21 | Curtis |
| CK Technologies – Brownsville, Texas | The SWP3 does not mention the Sector Y specific requirement for reviewing the use of zinc at the facility and possible pathways where zinc could contaminate stormwater runoff. | Texas General Permit No. TXR050000, August 14, 2016, Part V, Sector Y.2.a | Update the SWP3 to include a review of the use of zinc at the facility. If zinc is not used, the SWP3 should still mention this information. | 3-2-21 | Curtis |
| Global Parts | According to the 2020 OSHA logs, the facility operates under three different North American Industry Classification System (NAICS) codes. Building 907 operates under NAICS 336413, which correlates to Standard Industrial Classification (SIC) 3728. SIC code 3728 is considered light manufacturing and discharge of industrial storm water is regulated. The facility does not maintain a permit or storm water pollution prevention plan (SWPPP). Current exposures on the property include storage of scrap metal, tires, chemicals, and obsolete equipment. | 40 CFR 122.21  40 CFR 122.26  State of Kansas General Permit No. S-ISWA-1611-1 | Due to current exposures, the facility needs to obtain a storm water permit through KDHE by submitting a Notice of Intent (NOI) and develop a storm water pollution prevent plan (SWPPP).  The other option is to eliminate all sources of storm water exposure and submit a No Exposure Certification Form (NOEC) to KDHE. | 8-19-21 | Curtis |
| Pet-Ag | The facility operates under Standard Industrial Classification (SIC) 2047. SIC code 2047 is considered light manufacturing and discharge of industrial storm water is regulated. The facility obtained a No Exposure Certification from ILEPA for exclusion from NPDES storm water permitting on 4-2-21. There are current storm water exposures including a pallet of product stored temporarily outside, a pallet of salt left with tarp off (See Photo 1), and hydraulic equipment from the trash compactor leaving oily residue on the ground (See Photo 2). | 40 CFR 122.21  40 CFR 122.26  State of Illinois General NPDES Permit No. ILR00 | To maintain the current No Exposure Certification, move all exposed product and salt storage indoors or provide weatherproof cover to all items. The oily residue must be cleaned up and the hydraulic equipment needs weatherproof cover to prevent exposure to prevent introduction of a pollutant (i.e. oil) to storm water.  The other option is to obtain a storm water permit through ILEPA by submitting a Notice of Intent (NOI) and develop a storm water pollution prevent plan (SWPPP). | 9-14-21 | Curtis |
| Hillsboro | Wash water with cleaning chemicals is being discharged outside of the Washbay area resulting in unauthorized stormwater discharges (See Photos 1, 2, 3 and 4). The Kansas Stormwater General Permit does not authorize wastewater discharge to waters of the State of Kansas. | Kansas Stormwater General Permit S-ISWA-2111-1, Section 1.4 | The interior of the Washbay should be designed to prevent wastewater from draining outside the building. The floor surface should be designed to drain toward a collection point, the perimeter of the building should be sealed, or a small berm should be placed at the door entrance to prevent stormwater discharge. | 8-30-22 | Curtis |
| Max | The current contact information and composition of the Pollution Prevention Team still lists Suzie McMillian who is no longer with MAX. | Kansas Storm Water General Permit S-ISWA-2111-1, Section 2.4.1 | Update the Stormwater Pollution Prevention Plan (SWPPP) to reflect the current staff members and team responsibilities. | 11-24-21 | Curtis |
| Max | There are 7 totes of sodium hydroxide solution which are used in the wastewater pre-treatment process that are stored outside (See Photo 11). These totes are not mentioned in the SWPPP. | Kansas Storm Water General Permit S-ISWA-2111-1, Section 2.4.2(e) | If possible, move storage of these chemicals indoors to avoid risk of chemical spill due to mishandling or overall container degradation due to ultraviolet light from sunlight breaking down the plastic integrity of totes. If unable to move indoors, update SWPPP to reflect potential pollutant source. | 11-24-21 | Curtis |
| Max | The current SWPPP states that storm water inspections are taking place weekly during the hazardous waste inspections. No documentation or evidence was present at the time of the audit that shows inspections related to storm water management are taking place. | Kansas Storm Water General Permit S-ISWA-2111-1, Section 2.4.3(d) | Begin completing at least quarterly inspections to inspect equipment and storage areas for raw material, finished product chemicals, recycling, equipment, paint, maintenance, loading, unloading, and waste management areas. An inspection report is required that includes completion dates for correction of all deficiencies. | 11-24-21 | Curtis |
| BG Products | The current Stormwater Pollution Prevention Plans (SWPPP’s) do not have a certification completed for the evaluation of outfalls for non-stormwater discharges as stated in Appendix G of the plans. | Kansas Stormwater General Permit S-ISWA-2111-1, Section 2.4.3(g) | Complete a study of all outfalls during dry weather conditions to verify no non-stormwater discharges are occurring. Once this is complete, sign the certification statements provided in Appendix G of the SWPPP’s. | 9-30-22 | Curtis |
| Max | The current SWPPP says that employees are trained on storm water management during Emergency and HazCom training. At the time of the audit there was no evident this was taking place. | Kansas Storm Water General Permit S-ISWA-2111-1, Section 2.4.3(e) | Ensure all personnel who have responsibilities for implementing activities identified in the SWPPP or otherwise responsible for storm water management are trained. iSi recommends annual training frequency. | 11-24-21 | Curtis |
| Perfekta | The current SWPPP says that employees are trained on stormwater management during initial orientation and annually thereafter. At the time of the audit there was no evidence this was taking place. | Kansas Stormwater General Permit S-ISWA-2111-1, Section 2.4.3(e) | Ensure all personnel who have responsibilities for implementing activities identified in the SWPPP or otherwise responsible for stormwater management are trained initially and on an annual frequency. | 7-27-22 | Curtis |
| Max | At the time of the audit, there was no evidence that annual comprehensive site compliance evaluations have been completed. | Kansas Storm Water General Permit S-ISWA-2111-1, Section 2.4.4 | Complete a documented comprehensive site compliance evaluation annually. The evaluation needs to include review of visual inspections, personnel making review, date(s), major observations, actions taken, and resolution to non-compliances. | 11-24-21 | Curtis |
| Max | At the time of the audit, there was no evidence that a visual examination of storm water quality has taken place. | Kansas Storm Water General Permit S-ISWA-2111-1, Section 2.4.5(a) | Complete a visual inspection of storm water quality at least annually of each outfall during a rain event. The inspection report must include the date and time, name of the person performing examination, nature of discharge, visual quality of the discharge, and probable sources of any observed contamination. | 11-24-21 | Curtis |
| BG Products | There was no evidence that annual visual examinations of stormwater quality have taken place. | Kansas Stormwater General Permit S-ISWA-2111-1, Section 2.4.5(a) | Complete a visual inspection of stormwater quality at least annually of each outfall during a rain event. The inspection report must include the date and time, name of the person performing examination, nature of discharge, visual quality of the discharge, and probable sources of any observed contamination. | 9-30-22 | Curtis |
| Max | The current written SWPPP was created internally by the facility and lacks several provisions required by KDHE. | Recommendation  Kansas Storm Water General Permit S-ISWA-2111-1, Section 2.3 | iSi recommends, and KDHE also highly encourages and recommends, that SWPPP’s are prepared by, or under the supervision of a Kansas licensed Professional Engineer (P.E.) or with the services of a qualified consultant. | 11-24-21 | Curtis |
| Cascade Engineering – Montpelier, Ohio | Several areas of trash and debris were identified on the North side of the facility (See Photo 2). | Ohio Storm Water General Permit OHR000006, Section 2.1.2.2 | Clean up all trash debris around the facility. Trash debris can be managed on an as-needed basis during routine inspections or on a routine clean-up schedule to ensure trash debris is not accumulating. | 12-16-21 | Curtis |
| Cascade Engineering – Montpelier, Ohio | The Storm Water Pollution Prevention Plan (SWPPP) does not identify all potential pollutant sources on the property including: (See Photo 3)   * Propane storage * Compressed gas cylinders   Scrap metal | Ohio Storm Water General Permit OHR000006, Section 5.1.3.2 | Update the SWPPP to include all current pollutant sources associated with each identified industrial activity. | 12-16-21 | Curtis |
| Cascade Engineering – Grand Rapids, MI | Significant raw material debris was evident along the East silos due to maintenance work and spillage (See Photo 1). | Michigan Stormwater General Permit MIS110000, Part I.B.4 | Clean up all material debris around the facility immediately following spills and maintenance work to prevent stormwater contamination. | 6-24-22 | Curtis |
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| **Resource Conservation and Recovery Act (RCRA) – Chapter I Subchapter I – Solid Waste (40 CFR 239-279)** | | | | | |
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| Vermillion | Used solvent wipes were observed in the bottom of a flammable cabinet, at work stations, and in the trash (photos 2 – 4). | 40 CFR 260.10  40 CFR Part 261.4  KDHE Technical Guidance Document – Solvent-Contaminated Wipes (HW-1995-G2) | All excluded wipes must be containerized when not in use. Containers must be kept closed and clearly labeled with the words “Excluded Solvent Contaminated Wipes.” Approval must be obtained from the landfill prior to shipping wipes under the exclusion (see Appendix A). | Amanda | 7-23-18 |
| Vermillion | Contaminated debris (cups, rags, paint brushes, etc.) are sitting on table top drying (photo 9-11). | 40 CFR 260.10 | A waste determination from 2016 for “solid hazardous waste” (see Appendix B) shows this material to be a hazardous waste, and should therefore be kept in a closed container and labeled as “Hazardous Waste”. | Amanda | 7-23-18 |
| USD259 | Used solvent contaminated wipes were observed hanging out of drum (photo 1). | 261.4(a)(26),(b)(18)  KDHE Technical Guidance Document – Solvent-Contaminated Wipes (HW-1995-G2) | All excluded wipes must be completely containerized when not in use. | Amanda | 7-30-18 |
| Hillsboro | One drum of Excluded Solvent Contaminated Wipes is labeled as both “Hazardous Waste” and “Excluded Solvent Contaminated Wipes.” (Photo 9) | 40 CFR 261.4(a)(26)  40 CFR 261.4(b)(18)  KDHE Technical Guidance Document – Solvent-Contaminated Wipes (HW-1995-G2) | All excluded wipes containers must be clearly marked with the words “Excluded Solvent Contaminated Wipes.” | Bria | 7-10-19 |
| USD 259 | A drum of solvent wipes was comingled with contaminated debris (tubes of adhesive, paint brushes, etc.) (photos 8-9). | 261.4(a)(26),(b)(18)  KDHE Technical Guidance Document – Solvent-Contaminated Wipes (HW-1995-G2) | Excluded solvent contaminated wipes must be containerized separately from other waste streams. A waste determination should be completed for contaminated debris and then labeled and disposed of accordingly. | Amanda | 7-30-18 |
| USD 259 | Site is disposing of solvent wipes under the EPA exclusion to the landfill, but no approval from landfill was found on file. | 261.4(a)(26),(b)(18)  KDHE Technical Guidance Document – Solvent-Contaminated Wipes (HW-1995-G2) | Site must receive approval from landfill prior to disposing of wipes. Documentation showing that the wipes are removed from the site within 180 days from date of generation must be kept on file. | Amanda | 7-30-18 |
| BG Products | Wipes contaminated with IPA and other alcohol based solvents are being disposed of in regular trash. Need to be managed as hazardous waste or excluded solvent contaminated wipes. | 40 CFR 261.4(a)(26)  40 CFR 261.4(b)(18)  KDHE Technical Guidance Document HW-1995-G2 |  | 7-27-21 | Curtis |
| Pet-Ag | Alpet D2 sanitizing wipes (See Photo 3) and MEK wipes (See Photo 4) are being used in the facility and thrown in the trash. Alpet D2 wipes have a flashpoint of 70°F and MEK has a flashpoint of 20°F. Both wipes are flammable solids. | 40 CFR 261.4(a)(26)  40 CFR 261.4(b)(18) | Begin managing discarded wipes as hazardous waste or manage under the excluded solvent contaminated wipes rule. See Appendix C. | 9-14-21 | Curtis |
| GKN | The facility is using acetone and methyl ethyl ketone (MEK) on rags but is not managing as hazardous waste or excluded solvent contaminated wipes. To be excluded from hazardous waste regulations, the rags must be managed according to the exclusion rule. | 40 CFR 261.4(a)(26)  40 CFR 261.4(b)(18)  KDHE Technical Guidance Document HW-1995-G2 | Begin segregating solvent contaminated rags from oily rags. Recommend using different colored rags for easier management. Follow KDHE’s guidance document HW-1995-G2 for proper management. See Appendix D. | 9-13-22 | Curtis |
| USD 259 | Cardboard and cotton wipes contaminated with ink were observed in the trash (photo 19-20). | 40 CFR 262.11  K.A.R. 28-31-4(f)(1)(c) | Complete a waste determination in order to determine if material can be disposed of in regular trash. | Amanda | 7-30-18 |
| USD 259 | No waste determination was on-file for sand blasting machine (photo 31). | 40 CFR 262.11  K.A.R. 28-31-4(f)(1)(c)  KDHE Technical Guidance Document – Hazardous Waste Determinations (HW-2011-G1) | Complete a waste determination in order to determine if material can be disposed of in regular trash. | Amanda | 7-30-18 |
| Vermillion | No waste determination was on file for oily rags, which were observed on table tops and in trash in maintenance (photos 5-6). | 40 CFR 262.11 | Oily rags that contain no free-flowing liquids may be disposed of in regular trash. Create waste determination to reflect this. | Amanda | 7-23-18 |
| Vermillion | The waste code D009 is listed on several manifests, but is not present on the notification of regulated waste. D008 is present on waste determinations, but not present on any manifests. | 40 CFR 262.11  K.A.R. 28-31-261  K.A.R. 28-31-4 | Evaluate current waste streams for correct waste codes. Ensure that waste determinations match profiles and manifests. Update Notification of Regulated Waste Activity form to reflect any changes. | Amanda | 7-23-18 |
| Hillsboro | Waste determination missing for the following wastes, “Sandpaper,” “Glue/Adhesives”, “Aerosol Cans,” “Oil Filters,” “PCB/Non-PCB Ballasts,” etc. | 40 CFR 262.11  K.A.R. 28-31-262(c)(2)  Kansas Department of Health and Environment (KDHE) Technical Guidance Document – Hazardous Waste Determinations (HW-2011-G1) | Ensure all waste, hazardous and non-hazardous, has a waste determination.  It is recommended that a full evaluation on the waste being generated at the facility be conducted and all waste determinations be reviewed. | Bria | 7-10-19 |
| Hillsboro | Several partially full aerosol cans and paint cans were observed throughout the facility. (Photos 5, 12, 17, 20, 21, 22, 23) | 40 CFR 262.11  K.A.R. 28-31-262(c)(2)  KDHE Technical Guidance Document – Hazardous Waste Determinations (HW-2011-G1) | Complete a waste determination in order to determine if:  1) The material is waste.  2) If the material is waste, can it be disposed of in the regular trash or is it considered hazardous waste.  In the event that these aerosol cans cannot be fully emptied, “Resource Conservation and Recovery Act (RCRA) Empty,” and it is determined that they contain hazardous waste, it is recommended that a plan be developed for the disposal of partially full aerosol cans containing hazardous waste (i.e. set up a hazardous waste satellite container for partially full aerosol cans, install a puncturing device on a hazardous waste satellite container).  Throwing away partially full aerosol cans could be considered unlawful disposal of hazardous waste. | Bria | 7-10-19 |
| Atlas | The waste determination for grinding discs/pads does not encompass all discs/pads used at the facility. | 40 CFR 262.11 | Re-review, and potentially re-sample, the grinding discs/pads used throughout the facility and update waste determination to reflect all buildings. | Bria | 5-9-18 |
| Learjet – Hartford | Solder sponges are used in the Avionics Shop with lead-based solder. Based on employee interviews, the sponges may be discarded in the trash when they are no longer usable. The sponges could be hazardous waste due to the lead used. No records of waste characterization for the solder sponges were available | 40 CFR 262.11 and RCSA 22a-449(c)-102(a)(1) and (a)(2)(A) |  | 2017 | Golder |
| Cascade Engineering – Grand Rapids, MI Part 1 | Waste determinations are only completed for wastes that are picked up from the vendor, Heritage Crystal-Clean. All hazardous waste generators are required to determine if their wastes are a hazardous waste by either knowledge of the waste stream or by testing it, and maintaining records of that determination for at least 3 years. | 40 CFR 262.11  R 299.9302 | Complete a full waste survey of all solid waste streams and complete a documented hazardous waste determination for each waste stream. This includes but not limited to scrap metal, electronic wastes, batteries, liquid wastes hauled off site, rags, sludge, etc. | 2-18-21 | Curtis |
| CK Technologies – Brownsville, Texas | Waste determinations are only completed for wastes that are picked up from the vendor, ChemSol. Current wastes picked up include only hazardous and universal wastes. All hazardous waste generators are required to determine if their wastes are a hazardous waste by either knowledge of the waste stream or by testing it, and maintaining records of that determination for at least 3 years. | 40 CFR 262.11  30 TAC 335.504 | Complete a full waste survey of all solid waste streams and complete a documented hazardous waste determination for each waste stream. This includes but not limited to scrap metal, electronic wastes, batteries, liquid wastes hauled off site, rags, sludge, etc. (See Appendix D). | 3-2-21 | Curtis |
| CK Technologies – Mount Airy, North Carolina | Waste determinations are not completed for all waste streams at the facility. All hazardous waste generators are required to determine if their wastes are a hazardous waste by either knowledge of the waste stream or by testing it, and maintaining records of that determination for at least 3 years. | 40 CFR 262.11  15A NCAC 13A.0107(a) | Complete a full waste inventory of all solid waste streams and complete a documented hazardous waste determination for each waste stream. This includes but not limited to scrap metal, electronic wastes, batteries, liquid wastes hauled off site, rags, sludge, etc. | 4-14-21 | Curtis |
| Hillsboro Industries | The waste paint waste determination will need to be updated to account for the D035 waste code as MEK is utilized in the painting process. | 40 CFR 262.11  KDHE Technical Guidance Document – Hazardous Waste Determinations and Documentation (HW-2011-G1) | MEK is being utilized in the paint area and is ending up in the hazardous waste. D035 needs to be added to the waste paint profile.  Waste determinations to be maintained for 3-years. | 6-17-21 | Curtis |
| Global Parts | The facility is currently generating a small amount of hazardous waste from the spray painting process and thus the facility is a hazardous waste generator. Documented waste determinations are not completed on all waste streams for the facility.  All hazardous waste generators are required to determine if their wastes are a hazardous waste by either knowledge of the waste stream or by testing it, and maintaining records of that determination for at least 3 years. | 40 CFR 262.11  K.A.R. 28-31-262  KDHE Technical Guidance Document – Hazardous Waste Determinations (HW-2011-G1) | Complete a full waste survey of all solid waste streams and complete a documented hazardous waste determination for each waste stream. This includes but not limited to scrap metal, electronic wastes, batteries, liquid wastes hauled off site, rags, sludge, etc. The only exemption is for regular office trash. See Appendix A. | 8-19-21 | Curtis |
| Ultra Clean Midwest | Waste determinations are not completed for all waste streams at the facility. All hazardous waste generators are required to determine if their wastes are a hazardous waste by either knowledge of the waste stream or by testing it, and maintaining records of that determination for at least 3 years. | 40 CFR 262.11  10 CSR 25-5.262(1) | Complete a full waste inventory of all solid waste streams and complete a documented hazardous waste determination for each waste stream. This includes but not limited to scrap metal, electronic wastes, batteries, liquid wastes hauled off site, rags, sludge, etc. | 12-8-21 | Curtis |
| Cascade Engineering – Montpelier, Ohio | While some hazardous waste determinations are documented through waste profiles or ISO documentation, waste determinations are not completed for all waste streams at the facility. All hazardous waste generators are required to determine if their wastes are a hazardous waste by either knowledge of the waste stream or by testing it, and maintaining records of that determination for at least 3 years. | 40 CFR 262.11  OAC 3745-52-11 | Complete a full waste inventory of all solid waste streams and complete a documented hazardous waste determination for each waste stream. This includes but is not limited to scrap metal, electronic wastes, batteries, liquid wastes hauled off site, rags, sludge, etc. | 12-16-21 | Curtis |
| BG Products | The waste determinations list using process knowledge as the methodology for making the determinations for many chemicals, but Safety Data Sheets (SDSs) are not saved with the determinations. | 40 CFR 262.11(c)(2) | KDHE requires all records used to make determinations (SDSs, process description/flow diagrams, etc.) to be attached or otherwise maintained onsite. KDHE does not allow use of a waste profile as the documented evaluation. | 9-30-22 | Curtis |
| BG Products | The facility is currently considering the discarded filters from the aerosol can puncturing station as non-hazardous waste. | 40 CFR 262.11(c)(2) | According to industry guidance, discarded filters should be assigned all of the hazardous waste codes that apply to the accumulated residual aerosol can liquids unless testing or knowledge can be used to demonstrate the waste does not exhibit the hazardous waste characteristic(s). | 9-30-22 | Curtis |
| Global Parts | The facility is generating hazardous waste in both normal process and inventory clean-up activities on a non-routine basis, however the facility is unsure of its generator category. | 40 CFR 262.13  K.A.R. 28-31-262  Guidance Document HW-2011-G2 | Document the amount of hazardous waste generated over the past 3 years and make a formal determination of what category the facility should be. It is based on generation per month and total storage at any one time of hazardous waste. Do not include wastewater discharge, used oil, or universal waste. For definition of hazardous waste see Appendix B. | 8-19-21 | Curtis |
| Cascade Engineering – Grand Rapids, MI | The aerosol can puncturing station has the air filter removed, thus leaving the hazardous waste container with an opening (See Photo 3). Although there is no formal requirement at the federal level or State of Michigan level to close hazardous waste containers at the VSQG generator level, it is recommended to do so. State of Michigan in their guidance states to close containers except when adding or removing waste. | Recommendation  40 CFR 262.14  R 299.9304  40 CFR 265 Subpart AA  EGLE Very Small Quantity Hazardous Waste Generators Guidance Revision 8/2021 | Reattach the air filter to the aerosol can puncturing station to close the hazardous waste container and ensure no hazardous air emissions are occurring. | 6-24-22 | Curtis |
| USD 259 | Waste is being brought to service center from USD 259 schools (photo 24). | 40 CFR 262.14(a)(5)(viii) and 40 CFR 262.17(f)  Bureau of Waste Management Policy 2017-P2 | Schools would be classified as a CESQG and could in turn, send their hazardous waste to a LQG (Service Center) that is under the control of the same person. The LQG must submit the Notification of Regulated Waste Activity form and addendum for LQG consolidation of CESQG to the KDHE Bureau of Waste Management. The LQG must also ensure that waste is labeled as “Hazardous Waste” and that determinations are created once the waste is brought to the service center. | Amanda | 7-30-18 |
| Cascade Engineering – Grand Rapids, MI | A plastic container with “waste acetone” was in the Quality Lab without proper labeling (See Photo 2). A waste determination was also not available. | 40 CFR 262.14(a)(5)(viii)(B)(1)  R 299.9304(1)(e)(xii)(A)  40 CFR 262.11  R 299.9302  EGLE Very Small Quantity Hazardous Waste Generators Guidance Revision 8/2021 | Label the container with the words “hazardous waste.” Also, document a waste determination for the waste stream. See Appendix C. | 6-24-22 | Curtis |
| Pefekta | Several cue tips were laying on the floor that were used with MEK. All hazardous waste materials must be placed in a closed container and labeled as hazardous waste as soon as the material is determined to be waste. | 40 CFR 262.16(b)(2)(iii) | Ensure all employees are placing hazardous waste immediately into closed and labeled hazardous waste containers. | 7-27-22 | Curtis |
| Cascade Engineering – Montpelier, Ohio | Weekly hazardous waste storage area and emergency equipment inspections are being completed frequently but are not being documented. Small Quantity Generators (SQG’s) must complete an inspection at least weekly of central accumulation areas looking for leaking containers and for deterioration of containers caused by corrosion or other factors as well as emergency equipment. | 40 CFR 262.16(b)(2)(iv)  OAC 3745-52-16(B)(2)(d)  OAC 3745-65-33 | Ensure that hazardous waste inspections are completed weekly for all storage areas and emergency equipment. Inspections must be recorded in an inspection log or summary. See Appendices C, D, and E. | 12-16-21 | Curtis |
| Perfekta | The weekly hazardous waste central accumulation area has not been inspected and documented since July 2021. Small Quantity Generators (SQG’s) must complete an inspection at least weekly of central accumulation areas of storage containers looking for leaking containers and for deterioration of containers caused by corrosion or other factors. | 40 CFR 262.16(b)(2)(iv) | Ensure that hazardous waste inspections are completed weekly for all storage areas. Inspections must be recorded in an inspection log or summary. | 7-27-22 | Curtis |
| Perfekta | A step can used for hazardous waste collection was marked with a label for “biohazard” waste but not “hazardous waste.” Small quantity generators must mark or label containers with the words “hazardous waste.” | 40 CFR 262.16(b)(6)(i)(A) | Remove biohazard label and place a hazardous waste label on container. | 7-27-22 | Curtis |
| Perfekta | Hazardous waste storage drums in the central accumulation area were not labeled with the accumulation start date. The date upon which each period of accumulation begins must be clearly visible for the inspection of each hazardous waste storage container. | 40 CFR 262.16(b)(6)(i)(C) | Ensure accumulation start dates are placed on all hazardous waste storage containers. | 7-27-22 | Curtis |
| CK Technologies – Mount Airy, North Carolina | The facility is listed as a small quantity generator (SQG) but does not maintain a preparedness and prevention plan and has not made arrangements with local police, fire, emergency response teams, emergency response contractors, equipment suppliers, local hospital, and Local Emergency Planning Committee who are necessary for response to emergencies to the facility. | 40 CFR 262.16(b)(8)  15A NCAC 13A.0107(a) | Create a preparedness and prevention plan that includes all the requirements including equipment needed to respond to emergencies, internal communication or alarm systems, telephone or two-way radio capable of summon emergency assistance, fire extinguishers or fire control equipment. The plan must be sent to local fire, police, medical, and emergency response authorities. Employees must be thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities. | Curtis | 4-14-21 |
| Hillsboro Industries | No spill kit or fire extinguisher is located at the storage area (see Photo 2). | 40 CFR 262.16(b)(8)(ii) | A spill kit and fire extinguisher should be located in close proximity to the storage area. There is a fire extinguisher in the south storage building that can be used but should have a sign on the outside of the building showing a fire extinguisher is located inside that can be easily seen from the storage area. | 6-17-21 | Curtis |
| Hillsboro | Emergency responders at the facility consist of Jason Elliot and Mike Gerken. | 40 CFR 262.16(b)(9)(iii) | Primary and secondary emergency responders shall have the appropriate response training.  It is recommended that emergency responders attend HAZWOPER training. | Bria | 7-10-19 |
| Hillsboro | Weekly hazardous waste storage area inspections for the weeks of October 28, 2018 – November 3, 2018 and March 3, 2019 – March 9, 2019 were not conducted.  The weekly hazardous waste storage area inspections for July 1, 2016 – June 22, 2018 were not readily available for review. | 40 CFR 262.16(b)(2)(iv) | Ensure that hazardous waste inspections are completed weekly for all storage areas. | Bria | 7-10-19 |
| CK Technologies – Mount Airy, North Carolina | The facility has a posting for emergency response, but does not meet all the requirements including the name of an emergency coordinator who is able to reach the site within a short time (30 minutes) or location of fire extinguishers, spill control material and alarms. | 40 CFR 262.16(b)(9)  15A NCAC 13A.0107(a) | Update the emergency response poster to include a primary and secondary emergency coordinator who are able to respond to emergencies within a 30-minute response time. The poster must be next to telephones or in areas directly involved in the generation and accumulation of hazardous waste. | 4-14-21 | Curtis |
| Hillsboro | Emergency contact information signage had fallen onto the ground next to the 90-day hazardous waste storage area. | 40 CFR 262.16(b)(9)(ii) | Hazardous waste storage areas must have emergency contact information clearly posted. | Bria | 7-10-19 |
| Facility | Failure to train employees on the SQG Preparedness and Prevention Plan | 40 CFR 262.16(b)(9)(iii)  K.A.R. 28-31-262(d) | Employees must be thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies. | Bria | 7-30-18 |
| Cascade Engineering – Grand Rapids, MI Part 1 | The East Plant is registered as a Small Quantity Generator (SQG) but is not conducting weekly documented inspections of central accumulation areas. | 40 CFR 262.16(b)(2)(iv)  R 299.9306 | If maintaining classification as a SQG, ensure that hazardous waste inspections are completed on a weekly basis for all storage containers of hazardous waste. | 2-18-21 | Curtis |
| Cascade Engineering – Grand Rapids, MI Part 1 | Current employees are not trained on emergency procedures related to hazardous waste. Employees must be thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies. | 40 CFR 262.16(b)(9)(iii)  R 299.9306 | As a SQG, employees must be thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies. | 2-18-21 | Curtis |
| Facility | No job descriptions were found for employees handling hazardous waste. | KAR 28-31-262; 40 CFR 262.17(a)(7)  40 CFR 265.16(d) | Training documentation related to hazardous waste that the owner or operator must maintain at the facility must include the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job. | Amanda | 7-30-18 |
| Hillsboro | Ensure all waste codes are accounted for with KDHE. | K.A.R. 28-31-4  40 CFR 262.18  KDHE Notification of Regulated Waste Activity Form (Form 8700-12 and 8700-23) | Ensure that all waste codes are present on your annual hazardous waste report. Should a waste code not be present, or an extra waste code be present on the annual hazardous waste report it is recommended that a Notification of Regulated Waste Activity Form be updated and submitted to KDHE. | Bria | 7-10-19 |
| Global Parts | The facility generates hazardous waste in quantities exceeding amounts needed to be registered with an EPA identification number.    In Kansas, Conditionally Exempt Small Quantity Generators (CESQG’s) do not need a registration number under normal circumstances. Since the facility generated more than 55 pounds of hazardous waste in the March 2021 shipment, the facility should either had to (1) obtain authorization to do an episodic event or (2) register as a short-term generator as a large quantity generator (LGQ). Both circumstances required registration with EPA. | 40 CFR 262.18  K.A.R. 28-31-262  40 CFR 262.232 | After determining the facility’s generator category, obtain an EPA identification number through KDHE to allow generating of hazardous waste in excess of 55 pounds per month using KDHE’s form of Notification of Regulated Waste Activity. See Appendix C. | 8-19-21 | Curtis |
| Cascade Engineering – Montpelier, Ohio | The facility is currently registered as a SQG but last notification of regulated waste activity was in 2006. New EPA regulations require SQG’s to re-notify about their generator status every 4 years beginning 9-1-2021. | 40 CFR 262.18  OAC 3745-52-18 | Update and submit a new RCRA Subtitle C Site Identification form to the Ohio EPA. See Appendix F. Another option is to follow item # 4. | 12-16-21 | Curtis |
| Learjet – Wichita | Records of hazardous waste accumulation area inspections were not available for the following periods:  - Week of June 4, 2018  - Week of May 21, 2018  - Between July 5 and October 2, 2018 | KAR 28-31-262(a) and 28-31-265(a) (incorporates Federal rules [40 CFR 262 and 265] in effect on July 1, 2006)  40 CFR 262.34(a)(1)(i) and 265.174 (July 1, 2006 version) | At least weekly, the owner or operator must inspect areas where containers are stored. The owner or operator must look for leaking containers and for deterioration of containers caused by corrosion or other factors. | June 2019 | Golder |
| Learjet – Hartford | One lab pack drum in the Hazardous Waste Accumulation Building was not marked with a hazardous waste label | 40 CFR 262.34(a)(3) and RCSA 22a-449(c)-102(a)(2)(J) |  | 2017 | Golder |
| Learjet – Tucson, AZ | No records that employees received detailed, formal hazardous waste training.  Records were not available to verify employee training on universal waste. | 40 CFR 262.34(a) and  40 CFR 265.16  AAC R18-8-262.A  AAC R18-8-265.A (incorporate federal regulation by reference)  7.09 Pima County Code (incorporates State and Federal regulations by reference)  40 CFR 273.16  AAC R18-8-273 (incorporates Federal regulation by reference) | Employees involved with hazardous waste management must be trained on hazardous waste management procedures and response to emergencies. The training must be completed within 6 months of employment or assignment to hazardous waste responsibilities provided the employee is directly supervised during that 6 month period. A review of the training must be completed annually.  A small quantity handler of universal waste must inform all employees who handle or have responsibility for managing universal waste. The information must describe proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility. | August 2017 | Golder |
| GKN | A hazardous waste container of MEK in the centralized accumulation area is not marked with the accumulation start date (See Photo 2). | 40 CFR 262.34(a)(2) | Mark the container with the date the container become a hazardous waste storage container with MEK. Ensure weekly inspections are checking for proper labeling requirements. | 9-13-22 | Curtis |
| Vermillion | Paint waste from the Paint Mixing Area is being brought to and disposed of in a satellite drum in the Maintenance Shop (photo 7). | 40 CFR 262.34(c)  K.A.R. 28-31-262(c)(6) | Satellites must be stored at or near the point of generation where the waste initially accumulates. | 7-23-18 | Amanda S |
| Max | There is a 55-gallon drum of liquid paint waste that is not labeled with the words “hazardous waste” (See Photo 1). | 40 CFR 262.34(c)(1)(ii)  K.A.R. 28-31-262(c)(7) | Replace or cover up old chemical label and place a hazardous waste label onto the container. | 11-24-21 | Curtis |
| Learjet – Wichita | Two bags marked as hazardous waste were observed open in satellite accumulation areas. Waste was not being actively added or removed from the containers (Photographs 33 and 34). | KAR 28-31-262(a) and  28-31-265(a) (incorporates Federal rules [40 CFR 262 and 265] in effect on July 1, 2006)  40 CFR 262.34(c)(1) and 265.173(a) (July 1, 2006 version) | Hazardous waste must be accumulated in containers and those containers must be closed except when it is necessary to add or remove waste. | June 2019 | Golder |
| Learjet – Wichita | Based on completion reports from the site's training tracking system, the completion rate for hazardous waste / universal waste training in 2018 was 36%. There were no records of training for 2017. |  | KAR 28-31-262(a) and 28-31-265(a) (incorporates Federal rules [40 CFR 262 and 265] in effect on July 1, 2006)  40 CFR 262.34(a)(4) and 265.16 (July 1, 2006 version)  K.A.R 28-31-273(a) (incorporates Federal rule [40 CFR 273] by reference)  40 CFR 273.16 | June 2019 | Golder |
| Learjet – Fort Lauderdale |  |  |  | October 2017 | Golder |
| Learjet – Tucson, AZ | A container used to accumulate hazardous waste filter cake did not have a cover. The filter press was not running and the container was not being actively filled at the time of the observation. | 40 CFR 262.34(c)(1) and  40 CFR 265.173(a)  AAC R18-8-262.A and  AAC R18-8-265.A (incorporates Federal regulations by reference)  7.09, Pima County Code (incorporate Federal regulations by reference) | A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. | August 2017 | Golder |
| Learjet – Fort Lauderdale |  |  |  | October 2017 | Golder |
| USD 259 | Several drums of hazardous waste crushed lamps were observed outside of building with no date on drums (photos 38-39). | 40 CFR 265.34  K.A.R. 28-31-4(g)(h)(j)(m) | Ensure that all storage drums of hazardous waste are dated and disposed of within 90 days. | Amanda | 7-30-18 |
| USD 259 | Label not visible on drum of waste (photo 7). | 262.34(a)(2-3); (d)(4) | Ensure that labels are legible and visible on all containers of hazardous waste. | Amanda | 7-30-18 |
| Learjet – Bridgeport, WV |  |  | A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. | April 2018 | Golder |
| Learjet – Fort Lauderdale |  |  |  | October 2017 | Golder |
| Learjet – Fort Lauderdale |  |  |  | October 2017 | Golder |
| Max | There are 2 drums that are pending analysis dated 2-2-21 (See Photo 2). If these drums turn out to be hazardous waste, they will exceed the 180-day storage requirement. | 40 CFR 262.34(d)  K.A.R. 28-31-262a – Adopted by reference  RO 11424 (4-21-1989) | Ensure hazardous waste determination is completed in a timely fashion. If lab sample is lost, re-sample as soon as possible and make waste determination. | 11-24-21 | Curtis |
| Max | Employee is completing the weekly hazardous waste inspections but has not had training on hazardous waste management. | 40 CFR 262.34(d)(5)(iii)  K.A.R. 28-31-262a(d)(1)(A) | Ensure all employees who are completing hazardous waste inspections are fully trained on all applicable requirements on hazardous waste management. | 11-24-21 | Curtis |
| USD 259 | Failure to train employees on Hazardous Waste Contingency Plan | 40 CFR 262.34(d)(5)(iii)  40 CFR 265.16(a)(2)  40 CFR 265.16(d)(3) | Employees that handle waste should be trained on the contents of the Hazardous Waste Contingency Plan upon hire and then annually thereafter. | Amanda | 7-30-18 |
| Learjet – Fort Lauderdale |  |  |  | October 2017 | Golder |
| Learjet – Fort Lauderdale |  |  |  | October 2017 | Golder |
| USD 259 | A drum of paint waste was observed with a date of 4-4-18 (photo 21). | 40 CFR 262.34(e) | As a Large Quantity Generator of hazardous waste, waste can only be stored on-site for 90 days or less. | Amanda | 7-30-18 |
| USD 259 | No emergency contact information or hazardous waste signage is posted at the hazardous waste storage area (photo 26). | 40 CFR 262.52(d)-(e)  40 CFR 265.54(d)  K.A.R 28-31-4(h)(9) | Any hazardous waste storage area must have emergency contact information posted as well as signage that designates the area as a “Hazardous Waste Storage Area”. | Amanda | 7-30-18 |
| Hillsboro | Hazardous waste left unattended on a tabletop in the paint department. (Photo 7) | 40 CFR 264.173 | Hazardous waste must be disposed of to a container that is able to be properly closed and labeled “Hazardous Waste.” | Bria | 7-10-19 |
| USD 259 | No weekly hazardous waste inspection was observed for the week of 5-28-18. | 40 CFR 264.174 | All hazardous waste storage areas must be inspected weekly and documentation must be maintained on file for a minimum of 3 years. | Amanda | 7-23-18 |
| USD 259 | A weekly inspection from 3-5-18 was missing the date and time of inspection. | 40 CFR 265.15(d) | At a minimum, weekly inspections should be documented in a log and should include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions. | Amanda | 7-30-18 |
| Atlas | All weekly hazardous waste inspection logs are missing the time. | 40 CFR 265.15(d) | N/A | Bria | 5-9-18 |
| Atlas | There are no records on file for Tim Parks for RCRA or Contingency Plan training in 2017. Also, annual training records for 2018 could not be located at the time of the audit. | 40 CFR 265.16(c) | RCRA and Contingency Plan training is required annually for personnel responsible for hazardous waste handling. Ensure training is conducted and documented for both requirements. | Bria | 5-9-18 |
| Atlas | Job descriptions were outdated. | 40 CFR 265.16(d) | N/A | Bria | 5-9-18 |
| USD 259 | Even though the facility is a non-smoking site, several cigarettes were observed on the ground as well as were cigarette receptacles. Non-smoking signs were not posted at Hazardous Waste storage areas. | 40 CFR 265.31 | Ensure that “No-Smoking” signs are posted at the Hazardous Waste storage areas. | Amanda | 7-30-18 |
| GKN | A telephone or hand-held two-way radio capable of summoning emergency assistance is not immediately available to contact external emergency assistance by hazardous waste accumulation areas. The West building has a phone in an adjacent room in a cubicle and the East building has a phone in excess of 75 feet away at a workstation. | 40 CFR 265.32(b) | Install phones or other communication devices within the immediate area of both hazardous waste central accumulation areas that are capable of contacting external emergency response teams. Another option is to program all phone numbers into management personnel’s cell phones including emergency coordinators and fire department. | 9-13-22 | Curtis |
| USD 259 | Drums of spent batteries that were stored outside were not dated (photos 43-44). | 40 CFR 265.34  K.A.R. 28-31-4(g)(h)(j)(m) | Ensure that all containers of universal waste are maintained in good condition and dated when accumulation begins. | Amanda | 7-30-18 |
| USD 259 | Inadequate aisle space was observed in the Building A HW Storage Area (photo 22). | 40 CFR 265.35 | Ensure there is sufficient access to hazardous waste containers at all times. This should be an item noted during weekly inspections. | Amanda | 7-30-18 |
| Atlas | Inadequate aisle space was observed in the Building A HW Storage Area (photo 18). | 40 CFR 265.35 | Ensure there is sufficient access to hazardous waste containers at all times. This should be an item noted during weekly inspections. | Bria | 5-9-18 |
| Hillsboro Industries | The SQG Preparedness and Prevention Plan will need to be updated to account for the addition of D035 to the waste paint. | 40 CFR 265.37(a)(1) | Familiarize the local emergency authorities with the facility layout, properties and hazards of each waste handled. | 6-17-21 | Curtis |
| GKN | The facility is registered as a SQG but has not made attempts to make the following arrangements:   * Familiarize the local emergency authorities with the facility layout, properties and hazards of each waste handled, location of workers, entrances to facility roads, and possible evacuation routes. * Designate one authority where more than one police or fire department might respond to an emergency. * Made arrangements with state emergency response teams, emergency response contractors, and equipment suppliers.   Familiarize local hospitals with the properties of hazardous waste handled and types of injuries or illnesses which could result from fires, explosions, or releases at the facility. | 40 CFR 265.37(a) | Develop an SQG Preparedness and Prevention Plan and send copies to the local police and fire departments, responding medical facility, and Sumner County Emergency Management Coordinator. Use and keep certified mail receipts if sending by mail. If sending by e-mail confirm receipt and keep confirmation e-mail on file. | 9-13-22 | Curtis |
| Learjet – Hartford, CT | The emergency contacts posted at the Hazardous Waste Accumulation Building were not up-to-date and include contact information for people no longer with the company. The number for the emergency coordinator was not readable. In addition, the emergency contact information in the Emergency Response and Contingency Plan (dated May 2012) also included out-of-date emergency contact information | 40 CFR 265.52(d) and RCSA 22a-449(c)-105(a)(1) (incorporates Federal rule by reference) |  | 2017 | Golder |
| Learjet – Wichita | No records were available to demonstrate that the site’s hazardous waste contingency plan had been submitted to the local response authorities | 40 CFR 265.53 | A copy of the contingency plan and all revisions to the plan must be submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services | 2016 | Golder |
| Learjet – Hartford, CT | Records were not available to demonstrate that the Emergency Response and Contingency Plan had been submitted to responding agencies. | 40 CFR 265.53 and RCSA 22a-449(c)-105(a)(1) (incorporates Federal rule by reference) |  | 2017 | Golder |
| USD 259 | No documentation was on file showing that the Hazardous Waste Contingency Plan had been submitted to local agencies. | 40 CFR 265.53(b) | Copies of the plan and any revisions must be provided to the police and fire department, hospitals, local emergency planning committee, and any emergency response agencies that may respond to an emergency. iSi recommends the use of Certified Mail when submitting documents to State and Federal agencies. | Amanda | 7-30-18 |
| Hillsboro Industries | A 55-gallon drum of hazardous waste flammable solids had lid on top, but not fully closed. Since it is not liquid, it does not have to be sealed liquid tight. For solids the lid must be in contact with the container with no gaps (see Photo 3). | 40 CFR 265.173(a)  KDHE Technical Guidance Document – Container Management for Hazardous Waste Generators (HW-2005-G1) | Ensure all hazardous waste containers are fully closed with no gaps. | 6-17-21 | Curtis |
| Hillsboro Industries | The 55-gallon drum of hazardous waste in the south spray booth had a missing lid (see Photo 4). | 40 CFR 265.173(a)  KDHE Technical Guidance Document – Container Management for Hazardous Waste Generators (HW-2005-G1) | Ensure all hazardous waste containers are kept closed at all times except for adding or removing waste. | 6-17-21 | Curtis |
| Max | There is a 55-gallon drum of hazardous waste in a satellite accumulation area with a lid that is not fully closed (See Photo 3). | 40 CFR 265.173(a)  K.A.R. 28-31-265 – Adopted by reference | Adjust lid position so the container is able to be fully closed or replace lid with new cover that is able to be shut so there are no visible air gaps between the lid and the container. | 11-24-21 | Curtis |
| USD 259 | Several weekly hazardous waste inspections were missing. | 40 CFR 265.174 | Ensure that hazardous waste inspections are completed weekly for all storage areas. | Amanda | 7-30-18 |
| Learjet – Dallas | Records of hazardous waste accumulation area inspections were not available for the following weeks…… | 40 CFR 265.174  30 TAC 335.69(f)(2) | At least weekly, the owner or operator must inspect areas where containers are stored. The owner or operator must look for leaking containers and for deterioration of containers caused by corrosion or other factors. | Sept 2019 | Golder |
| Max | Weekly hazardous waste inspections were not completed for the weeks ending 11-12 -21 or 11-19-21. | 40 CFR 265.174  K.A.R. 28-31-265(a) – Adopted by reference | Ensure weekly hazardous waste inspections are completed. If necessary, assign a back-up inspector who can complete the inspections when the primary inspector is busy or not present. | 11-24-21 | Curtis |
| Cascade Engineering – Grand Rapids, MI | Spent fluorescent bulbs were observed in open boxes and outside of boxes as well (See Photo 4). | 40 CFR 273.13(d)(1)  40 CFR 273.14(e)  40 CFR 273.15(c)  R 299.9228  EGLE Universal Waste Guidance Revision 5/2022 | Ensure all spent lamps are properly containerized, dated, closed, and marked with the words “Universal Waste – Lamps,” “Waste Lamps,” or “Used Lamps.” | 6-24-22 | Curtis |
| Learjet – Dallas |  | 40 CFR 273.14(a) and 273.15  TAC 335.261(b) |  | Sept 2019 | Golder |
| Learjet – Fort Lauderdale |  |  |  | October 2017 | Golder |
| Hillsboro | Rechargeable batteries, formerly used in power tools, which no longer hold a charge were observed on a tabletop. | K.A.R.28-31-273  40 CFR 273.2  KDHE Technical Guidance Document – Requirements for Handlers of Universal Waste (HW-2001-G1) | Ensure all spent batteries are properly containerized, dated, closed, and marked with the words, “Universal Waste – Batteries,”  SQGs may accumulate universal waste for no longer than one year from the date the universal waste is generated. | Bria | 7-10-19 |
| USD 259 | Un-containerized lamps, as well as an open box of lamps, were observed (photos 13 –14). | 40 CFR 273.13(d)(1)  40 CFR 273.14(e)  40 CFR 273.15(c)  KDHE Technical Guidance Document – Spent Fluorescent Lamps (HW-1995-G1) | Ensure all spent lamps are properly containerized, dated, closed, and marked with the words “Universal Waste – Lamps,” “Waste Lamps,” or “Used Lamps.” | Amanda | 7-30-18 |
| Hillsboro | Open and unlabeled box of universal waste lamps. (Photo 1). | 40 CFR 273.13(d)(1)  40 CFR 273.14(e)  40 CFR 273.15(c)  KDHE Technical Guidance Document – Spent Fluorescent Lamps (HW-1995-G1) | Ensure all spent lamps are properly containerized, dated, closed, and marked with the words “Universal Waste – Lamps,” “Waste Lamps,” or “Used Lamps.”  Small Quantity Generators (SQGs) may accumulate universal waste for no longer than one year from the date the universal waste is generated. | Bria | 7-10-19 |
| Vermillion | One 4-ft box of bulbs was observed as open (photo 8). | 40 CFR 273.14(e)  K.A.R. 28-31-273 | Ensure all spent fluorescent lamp containers are kept closed unless adding or removing lamps | Amanda | 7-23-18 |
| Hillsboro Industries | Spent fluorescent bulbs were observed in open containers in the compressor room and uncontainerized within the maintenance area. (see Photos 5, 6) | 40 CFR 273.13(d)(1)  40 CFR 273.14(e)  40 CFR 273.15(c)  K.A.R. 28-31-273  KDHE Technical Guidance Document – Spent Fluorescent Lamps (HW-1995-G1) | Ensure all spent lamps are properly containerized, dated, closed, and marked with the words “Universal Waste – Lamps,” “Waste Lamps,” or “Used Lamps.”  SQGs may accumulate universal waste for no longer than one year from the date the universal waste is generated. | 6-17-21 | Curtis |
| Max | There is a box of 4-foot fluorescent lamps (See Photo 4) and a box of metal halides lamps that were not closed (See Photo 5). | 40 CFR 273.13(d)(1)  K.A.R. 28-31-273 – Adopted by reference  KDHE Technical Guidance Document – Spent Fluorescent Lamps (HW-1995-G1) | Ensure all universal waste containers are properly containerized and closed. | 11-24-21 | Curtis |
| Max | There is a container of unlabeled waste fluorescent lamps (See Photo 6). | 40 CFR 273.14  K.A.R. 28-31-273 – Adopted by reference  KDHE Technical Guidance Document – Spent Fluorescent Lamps (HW-1995-G1) | Ensure all universal waste containers are properly marked with the words “Universal Waste – Lamps” or “Waste Lamps.” | 11-24-21 | Curtis |
| Max | There is a container of waste fluorescent lamps that has an accumulation start date of 4-5-19 (See Photo 7). Universal wastes are not allowed to be stored on-site for longer than 1 year. | 40 CFR 273.15(a)  K.A.R. 28-31-273 – Adopted by reference  KDHE Technical Guidance Document – Spent Fluorescent Lamps (HW-1995-G1) | Ensure universal waste is not stored for longer than 1-year. Best practices are to add inspections of universal waste to weekly hazardous waste inspection or move universal waste storage into same area as hazardous waste to ensure compliance. | 11-24-21 | Curtis |
| GKN | Containers of universal waste batteries are not able to demonstrate accumulation time is less than one year (See Photo 3). | 40 CFR 273.15 | A small quantity handler of universal waste must be able to demonstrate the length of time that the universal waste has been accumulated by:  (1) Placing the universal waste in a container and marking or labeling the container;  (2) Marking or labeling each individual item of universal waste;  (3) Maintaining an inventory system on-site that identifies the date each universal waste became a waste;  (4) Maintaining an inventory system that identifies the earliest date that any universal waste in a group of containers became a waste;  (5) Placing the universal waste in a specific accumulation area and identifying the earliest date that any universal waste became a waste; or  (6) Any other method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. | 9-13-22 | Curtis |
| Learjet – Dallas | The completion rate for hazardous waste / universal waste training in 2018 was approximately 65%. There were no records for training for 2017. | 40 CFR 273.16  30 TAC 335.261(b)  30 TAC 335.69(f)(5)(c) | The generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies.  A small quantity handler for universal waste must inform all employees who handle or have responsibility for managing universal waste. The information must describe proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility. | Sept 2019 | Golder |
| USD 259 | A drum of Used Oil was observed labeled as “Non-Hazardous Waste” (photo 17). | 40 CFR 279.22(c)  KDHE Technical Guidance Document – Used Oil (HW-1999-G1) | Ensure all used oil containers are clearly marked with the words “Used Oil.” | Amanda | 7-30-18 |
| USD 259 | A drum of Used Oil was observed labeled as “Non-Hazardous Waste Cutting Oil” (photo 32). | 40 CFR 279.22(c)  KDHE Technical Guidance Document – Used Oil (HW-1999-G1) | Ensure all used oil containers are clearly marked with the words “Used Oil.” | Amanda | 7-30-18 |
| Atlas | Unlabeled used oil containers were observed next to machines in Building D, as well as outside at Building 4330 (photos 19 – 23). | 40 CFR 279.22(c) | Ensure all used oil containers are clearly marked with the words “Used Oil.” | Bria | 5-9-18 |
| Learjet – Dallas | Used oil containers were not marked as “used oil” in the Facility Maintenance Shop and the leased hanger. | 40 CFR 279.22(c)(1)  30 TAC 324.6 | Containers and aboveground storage tanks used to store used oil at generator facilities must be labeled or marked clearly with the words “used oil” | Sept 2019 | Golder |
| Cascade Engineering – Grand Rapids, MI Part 1 | Labeling on used oil tanks in facility are labeled as “waste” oil. | 40 CFR 279.22(c)  R 299.9810 | Re-mark containers, tanks, and piping as “used oil.” The term “waste” implies the oil is potentially hazardous and does not follow the explicit regulations. | 2-18-21 | Curtis |
| Hillsboro Industries | Used oil container still has labeling from previous container use that contain different identification and hazard information (see Photo 7). | 40 CFR 279.22(c)  K.A.R. 28-31-279  KDHE Technical Guidance Document – Used Oil (HW-1999-G1) | Remove or cover repurposed containers so there is not conflicting identification and hazard identification. | 6-17-21 | Curtis |
| Global Parts | A small container of used oil is not labeled (See Photo 2). | 40 CFR 279.22(c)  KDHE Technical Guidance Document – Used Oil (HW-1999-G1) | Ensure all used oil containers are clearly marked with the words “Used Oil.” See Appendix D. | 8-19-21 | Curtis |
| Max | A small container of used oil from an oil skimmer is not labeled (See Photo 8). | 40 CFR 279.22(c)  K.A.R. 28-31-279 – Adopted by reference  KDHE Technical Guidance Document – Used Oil (HW-1999-G1) | Ensure all used oil containers are clearly marked with the words “Used Oil.” | 11-24-21 | Curtis |
| Hillsboro | Used oil is given to a local resident of Hillsboro who burns it. Receipts are not provided to prove that this used oil is removed from the property. | 40 CFR 279.24  KDHE Technical Guidance Document – Used Oil (HW-1999-G1) | A generator must use a used oil transporter who has registered with the KDHE. | Bria | 7-10-19 |
| GKN  (Kansas Reg) | The facility is completing the annual SQG hazardous waste site information verification, however during the audit the facility was not able to determine if the current notification of regulated waste activity to KDHE is up to date due to personnel change. | K.A.R. 28-31-4 | Submit an updated Notification of Regulated Waste Activity form to KDHE with new site contact information. Updates must be made within 60 days of change of site contact, new hazardous waste codes, or change in generator classification status. See Appendix C. | 9-13-22 | Curtis |
| GKN (Kansas Reg) | A 55-gallon aerosol can puncturing station (satellite container) is not marked with the words “hazardous waste” (See Photo 1). | K.A.R. 28-31-262(c)(7) | Mark the satellite container with the words “hazardous waste.” | 9-13-22 | Curtis |
| Learjet – Fort Lauderdale |  | 62-730-160(6) FAC |  | October 2017 | Golder |
| Learjet – Fort Lauderdale |  | 62-710.850(2) and (5)(a) FAC |  | October 2017 | Golder |
| Learjet – Dallas | Waste accumulated for a loose pack were identified as “flam” indicting they were ignitable hazardous wastes. They were not labeled as hazardous waste or with an accumulation start date. | 30 TAC 335.69(a)(2) and (3) | While being accumulated hazardous waste containers must be:  -Clearly marked with the date upon which each period of accumulation begins  -Labeled or marked clearly with the words “hazardous waste” | Sept 2019 | Golder |
| CK Technologies – Brownsville, Texas | A 55-gallon drum of universal waste (paint waste) had lid up and not latched. | 30 TAC 335.262(c)(2)(A) | Ensure all containers of universal waste are kept closed unless adding or removing waste. | 3-2-21 | Curtis |
| Vermillion | No current waste profiles were found on-site. | Recommendation | Contact Safety Kleen to get copies of current profiles. Review applicable processes and waste streams in order to create/update waste profiles with accurate waste codes. Waste profile codes should match waste determination codes. | Amanda | 7-23-18 |
| Vermillion | A copy of the PowerPoint for the 2017 Hazardous Waste Handlers’ training could not be located during the audit. | Recommendation | iSi recommends maintaining copies of the PowerPoint on file along with the sign-in sheets. | Amanda | 7-23-18 |
| Cascade Engineering – Grand Rapids – MI Part 1 | The East Plant is currently listed and regulated as a Small Quantity Generator (SQG). | Recommendation | The East Plant should have a hazardous waste inventory done to calculate the monthly generation and total accumulation of hazardous waste. Once done, if the facility is below 220 lbs/month generation and 2,200 lbs total one-time storage, the facility should notify EGLE to reclassify as a Very Small Quantity Generator (VSQG) to avoid several regulatory requirements. | 2-18-21 | Curtis |
| Cascade Engineering – Grand Rapids – MI Part 1 | Current access to historical hazardous waste generator documents can be hard to retrieve accurately. | Recommendation | With the passage of the e-Manifest rule from EPA in 2018, the company should sign up for an account on RCRAinfo to see the current site information as well as historical manifests starting in 2018. | 2-18-21 | Curtis |
| Cascade Engineering – Montpelier, Ohio | Site is currently registered as a SQG. Due to current hazardous waste generation levels and Ohio state-specific rules allowing paint and paint related waste to be universal waste, the site should reclassify as a Very Small Quantity Generator (VSQG). | Recommendation  OAC 3745-273-89(C) | Recommend updating generator status to VSQG. Benefits are overall reduction in regulatory burden and less likely to be inspected by Ohio EPA or federal EPA. See Appendix G. | 12-16-21 | Curtis |
| **Aboveground and Underground Storage Tanks (AST’s and UST’s) – Chapter I Subchapter I – Solid Waste (40 CFR 280-282)** | | | | | |
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| **Emergency Planning and Community Right-to-Know (EPCRA) – Chapter I Subchapter J (40 CFR 370)** | | | | | |
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| Learjet – Bridgeport, WV |  | 40 CFR 355.20(b) and 40 CFR 370.42(o) |  | April 2018 | Golder |
| USD259 | The last Tier II that was found on file was from 2011. | K.A.R. 28-65-1  40 CFR 370 | Ensure that a Tier II report is completed for all applicable chemicals on-site annually and submitted to KDHE and local agencies by March 1st of every year. | Amanda | 7-30-18 |
| USD259 | A large amount of lead acid batteries were observed throughout the facility either inside of equipment or in storage (photo 27). | K.A.R. 28-65-1  40 CFR 370 | Ensure that determination has been made to account for the amount of Lead and Sulfuric Acid that are in Lead Acid batteries that stored on-site. | Amanda | 7-30-18 |
| Learjet – Fort Lauderdale |  | 40 CFR 370  27P-14.003(1) and 27P-14.005 FAC |  | October 2017 | Golder |
| Hillsboro | Annual Tier II reports were not available for review for reporting years 2014 and 2015 | EPCRA 311/312  40 CFR 355 | Tier II reports and/or a determination is required on an annual basis. These files are to be maintained for 5-years. | Bria | 7-10-19 |
| Hartford – Learjet | The reporting year 2016 Tier II inventory report indicates that the maximum quantity of Jet A stored in a single container is 20,000 pounds. The largest container on-site is a 20,000 gallon tank so the maximum quantity should have been listed as approximately 134,200 pounds. The report also did not indicate that the site is a Section 302 facility. However, sulfuric acid, a Section 302 chemical, is on- site in quantities greater than the threshold planning quantity so the Secti... | 40 CFR 370.10 |  | 2017 | Golder |
| Learjet – Dallas | Diesel storage capacity in the fire pump and generator storage tanks total 1,600 gallons or approximately 11,840 pounds. Diesel fuel was not included on the reporting years 2017 and 2018 Tier II Inventory reports. | 40 CFR 370.10  25 TAC 295.182 | Facilities storing any EHS that meets or exceeds the TPQ or 500 pounds, whichever is less, at any one time, or any hazardous chemical for which OSHA requires a SDS that meets or exceeds 10,000 pounds at any one time shall submit an inventory form (Tier II) to the SERC, the LEPC, and the fire department with jurisdiction over the facility by March 1 of each year. The inventory shall contain information on hazardous chemicals present at the facility during the preceding calendar year above threshold levels. | Sept 2019 | Golder |
| Cascade Engineering – Grand Rapids, MI Part 1 | While Tier II reports are submitted for lead-acid batteries, no documentation was available to demonstrate a full evaluation is completed to validate other substances do not require reporting. | Recommendation  40 CFR 370.10 | It is best practice to fully document an annual evaluation to validate all applicable substances meeting threshold levels are being reported accurately.  Records should be maintained at the facility and be readily available for purposes of inspection by EGLE or EPA. | 2-18-21 | Curtis |
| CK Technologies – Brownsville, Texas | No documentation was available to demonstrate a full evaluation is completed to validate hazardous or extremely hazardous substances do not require reporting by sections 302 and 312 of EPCRA. | Recommendation  40 CFR 370.10 | It is best practice to fully document an annual evaluation to validate all applicable substances meeting threshold levels are being reported accurately.  Records should be maintained at the facility and be readily available for purposes of inspection by TCEQ or EPA. | 3-2-21 | Curtis |
| CK Technologies – Mount Airy, North Carolina | No documentation was available to demonstrate a full evaluation is completed to validate hazardous or extremely hazardous substances do not require reporting by sections 302 and 312 of EPCRA. | Recommendation  40 CFR 370.10 | It is best practice to fully document an annual evaluation to validate all applicable substances meeting threshold levels are being reported accurately.  Records should be maintained at the facility and be readily available for purposes of inspection by NCDEQ or EPA. | 4-14-21 | Curtis |
| Global Parts | No documentation was available to demonstrate a full evaluation is completed to validate hazardous or extremely hazardous substances (EHS) do not require reporting by sections 302 and 312 of EPCRA. | Recommendation  40 CFR 370.10 | It is best practice to fully document an annual evaluation to validate all applicable substances meeting threshold levels are being reported accurately.  Records should be maintained at the facility and be readily available for purposes of inspection by KDHE or EPA.  Facilities storing any EHS that meets or exceeds the threshold planning quantity (TPQ) or 500 pounds, whichever is less, at any one time, or any hazardous chemical for which OSHA requires a SDS that meets or exceeds 10,000 pounds at any one time shall submit an inventory form (Tier II) to the KDHE, the LEPC, and the fire department with jurisdiction over the facility by March 1 of each year. | 8-19-21 | Curtis |
| Max | No documentation was available to demonstrate a full evaluation is completed to validate hazardous or extremely hazardous substances do not require reporting by sections 302 and 312 of EPCRA.  The metal working fluid Xtreme Cut 250C is not considered hazardous according to the SDS from QualiChem. There are 7 totes of sodium hydroxide solution for pH adjustment of the wastewater treatment system (See Photo 11) which are corrosive. There is a 2,000-pound battery in a powered industrial truck that would contain sulfuric acid which is reportable at 500 pounds of sulfuric acid (See Photo 12). All chemical storage used in maintenance and spray painting needs to be evaluated. | 40 CFR 370.10  K.A.R. 28-65-1 | Facilities storing any Extremely Hazardous Substances (EHS) that meets or exceeds the threshold planning quantity (TPQ) or 500 pounds, whichever is less, at any one time, or any hazardous chemical for which OSHA requires a safety data sheet (SDS) that meets or exceeds 10,000 pounds at any one time shall submit an inventory form (Tier II) to the KDHE, the local emergency planning committee (LEPC), and the fire department with jurisdiction over the facility by March 1 of each year.  It is best practice to fully document an annual evaluation to validate all applicable substances meeting threshold levels are being reported accurately.  Records should be maintained at the facility and be readily available for purposes of inspection by KDHE or EPA. | 11-24-21 | Curtis |
| Ultra Clean Midwest | The facility stores (See Photo 4):   * 4 drums of sulfuric acid at 700 pounds per drum for a total of 2,800 pounds * 4 drums of nitric acid at 145 pounds per drum for a total of 580 pounds * 11 drums of phosphoric acid at 700 pounds per drum for a total of 7,700 pounds   Both sulfuric and nitric acid are considered an Extremely Hazardous Substance (EHS) and require reporting by Section 302 of the Emergency Planning and Community Right-to-Know act (EPCRA). Phosphoric acid is a hazardous substance but only requires reporting at 10,000 pounds on-site. At the time of the audit, neither sulfuric nor nitric acid have been reported to the Missouri Emergency Response Commission (MERC), Local Emergency Planning Committee (LEPC), and local fire department / district with jurisdiction on an annual basis. | 40 CFR 370.10  11 CSR 10-11.240 | Facilities storing any EHS that meets or exceeds the threshold planning quantity (TPQ) or 500 pounds, whichever is less, at any one time, or any hazardous chemical for which OSHA requires a SDS that meets or exceeds 10,000 pounds at any one time shall submit an inventory form (Tier II) to the MERC, the LEPC, and the fire department with jurisdiction over the facility by March 1 of each year.  Records should be maintained at the facility and be readily available for purposes of inspection by Missouri Department of Public Safety or EPA. | 12-8-21 | Curtis |
| Cascade Engineering – Montpelier, Ohio | The facility is reporting on sulfuric acid, which is present in lead-acid batteries for powered industrial trucks, at a total of 7,300 pounds, but is not including any mention or description on the lead content in the batteries, which most likely exceeds 10,000 pounds. All hazardous chemicals for which facilities are required to have or prepare a safety data sheet (SDS) must report starting at a threshold of 10,000 pounds to the State Emergency Response Commission (SERC), the Local Emergency Planning Committee (LEPC), and the local fire department having jurisdiction. | 40 CFR 370.10  40 CFR 370.40  Ohio Revised Code Chapter 3750 | Ensure the report mentions both sulfuric acid and lead if both are triggered. If the substances are reported combined for lead-acid batteries, ensure both substance’s hazards are identified and the mixture components are described. Applicable fees apply to both substances. | 12-16-21 | Curtis |
| Cascade Engineering – Montpelier, Ohio | Further documentation of applicability to sections 302 and 312 EPCRA should be completed. The facility stores many drums of paint products and numerous compressed gas cylinders (See Photo 3). | Recommendation  40 CFR 370.10  Ohio Revised Code Chapter 3750 | It is best practice to fully document an annual evaluation to validate all applicable substances meeting threshold levels are being reported accurately.  Records should be maintained at the facility and be readily available for purposes of inspection by Ohio EPA or federal EPA. | 12-16-21 | Curtis |
| Hillsboro | The facility is currently reporting 174,586 pounds of argon onsite. Based on the small tank on the west side of the facility and limited number of compressed argon cylinders in the facility, this number is too high. | 40 CFR 370.10  K.A.R. 28-65-1 | New calculations should be completed to obtain a more accurate weight. Quantities are counted based on maximum and average inventory at any one time at the facility. | 8-30-22 | Curtis |
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| **Toxic Release Inventory (TRI) – Chapter I Subchapter J (40 CFR 372)** | | | | | |
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| USD259 | No determination was on file to determine if the facility is applicable to Section 313 Toxic Release Inventory. | 40 CFR 372 | The facility must retain data supporting the determination of whether a threshold applies for each toxic chemical for a period of 3 years from the date of the submission of a Toxic Chemical Inventory (TRI) report.  Records must be maintained at the facility and be readily available for purposes of inspection by EPA. | Amanda | 7-30-18 |
| Vermillion | A copy of the 2017 Form R Determination could not be located during the audit. | Recommendation | Ensure that all reports/report determinations are kept on file. iSi recommends keeping all environmental files in the same location. | Amanda | 7-23-18 |
| Hillsboro | Annual SARA 313/Form R reports were not available for review for reporting years 2014 and 2015. | EPCRA 313 | Sara 313/Form R reports and/or a determination is required on an annual basis. These files are to be maintained for 5–years. | Bria | 7-10-19 |
| Cascade Engineering – Grand Rapids, MI Part 1 | No written determination was available to determine if the facility is applicable to SARA 313 Toxic Release Inventory (TRI). | Recommendation  40 CFR 372 | It is best practice to fully document an annual evaluation to validate all applicable substances meeting threshold levels are being reported accurately.  Records should be maintained at the facility and be readily available for purposes of inspection by EGLE or EPA. | 2-18-21 | Curtis |
| CK Technologies – Brownsville, Texas | A written determination was not readily available to determine if the facility is applicable to SARA 313 Toxic Release Inventory (TRI). | Recommendation  40 CFR 372 | It is best practice to fully document an annual evaluation to validate all applicable substances meeting threshold levels are being reported accurately. If ERA Environmental is performing this task, it is best to save the evaluation outside of their software in case the vendor is changed or access is restrictive.  Records should be maintained at the facility and be readily available for purposes of inspection by TCEQ or EPA. | 3-2-21 | Curtis |
| CK Technologies – Mount Airy, North Carolina | ERA Environmental is documenting air emissions quantities for the air permit, which captures many processes and substances, which are captured under SARA 313 Toxic Release Inventory (TRI); however, no full evaluation is documented for a threshold determination. | Recommendation  40 CFR 372 | It is best practice to fully document an annual evaluation to validate all applicable substances meeting threshold levels are being reported accurately.  Records should be maintained at the facility and be readily available for purposes of inspection by NCDEQ or EPA. | 4-14-21 | Curtis |
| Global Parts | No written determination was available to determine if the facility is applicable to SARA 313 Toxic Release Inventory (TRI). | Recommendation  40 CFR 372 | It is best practice to fully document an annual evaluation to validate all applicable substances meeting threshold levels are being reported accurately.  Records should be maintained at the facility and be readily available for purposes of inspection by KDHE or EPA. | 8-19-21 | Curtis |
| Max | A written determination was not available to determine if the facility is applicable to Superfund Amendments and Reauthorization Act (SARA) 313 Toxic Release Inventory (TRI). The facility processes metal parts for the aerospace industry including aluminum, stainless steel, and titanium. Aluminum metals contain chromium, copper, and manganese. Stainless steel metals contain chromium, nickel, and copper. All these metals are reportable at 25,000 pounds of processing on an annual basis. The facility also spray paints with chromium compounds which are reportable at 10,000 pounds of use on an annual basis. | Recommendation  40 CFR 372  K.A.R. 28-65-1 | It is best practice to fully document an annual evaluation to validate all applicable substances meeting threshold levels are being reported accurately.  Records should be maintained at the facility and be readily available for purposes of inspection by KDHE or EPA. | 11-24-21 | Curtis |
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| **Wastewater – Chapter I Subchapter N (40 CFR 400-471)** | | | | | |
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| Learjet – Tucson, AZ | The pH buffers used to calibrate the pH meters were marked with an expiration date of June 2015 for the pH 4.01 buffer. | 40 CFR 136 Table IB  Pima County Industrial Wastewater Discharge Permit No. 10707, Part I.A.3.b | All samples shall be collected, preserved, and analyzed using an appropriate EPA method reference in 40 CFR 136.  Note: 40 CFR 136 allows several different methods for pH monitoring including ASTM D1293-99, Standard Method 4500-H+, and USGS 974.27. Each standard includes discussions on buffer handling and replacement. USGS 974.27 clearly states pH buffers must be discarded on their expiration dates. | August 2017 | Golder |
| Max | The facility is completing environmental field tests for hydrogen ion (pH) as required by the industrial wastewater pre-treatment permit for the City of Wichita for wastewater discharges, but does not maintain Environmental Field Laboratory Accreditation with KDHE. | 40 CFR 136  K.A.R. 28-15-36a | Complete and submit the application for Environmental Field Laboratory Accreditation to KDHE’s Environmental Laboratory Accreditation Program Office with applicable fees. Accreditation is required every 3 years. | 11-24-21 | Curtis |
| USD259 | Water from the waterfall spray booth is being sent to the Publically Owned Treatment Works (POTW). A Memo dated January 26, 1995 was found on file that showed analytical from 1994. The results indicated that the water was over the regulatory limits for Chromium, Zinc, and Lead. No approval from the City of Wichita was found on file in order to send this waste stream to the POTW (photo 6). | 40 CFR 403.5(b) and (c) | If discharge water is sent to the sewer, USD 259 should obtain approval from the POTW for the discharge. | Amanda | 7-30-18 |
| USD 259 | Ultra-power B2B is used clean instruments. This material is then rinsed off of instruments into a sink which is then sent to the POTW (Photo 9-10). | 40 CFR 403.5(b) and (c) | If discharge water is sent to the sewer, USD 259 should obtain approval from the POTW for the discharge. | Amanda | 7-30-18 |
| USD 259 | A washing machine was observed that is washing rags on-site (photo 12). | 40 CFR 403.5(b) and (c) | If discharge water is sent to the sewer, USD 259 should obtain approval from the POTW for the discharge. | Amanda | 7-30-18 |
| USD 259 | Several floor sinks, gratings in the floor and compressor blowdown are discharging to the POTW (photos 15-16, 47, and 50). | 40 CFR 403.5(b) and (c) | If discharge water is sent to the sewer, USD 259 should obtain approval from the POTW for the discharge. | Amanda | 7-30-18 |
| Vermillion | Vermillion currently discharges compressor condensate water to a bucket that potentially is emptied into the sanitary sewer (photo 14). | 40 CFR 403.5(b) and (c) | If discharge water is emptied to the sewer, Vermillion should obtain approval from the POTW for the discharge. | Amanda | 7-23-18 |
| Hillsboro | Air compressor blowdown is discharged to the publically owned treatment works (POTW). Written approval from the POTW was not recovered by Hillsboro Industries. | 40 CFR 403.5(b) and (c) | If discharge water is sent to the POTW, Hillsboro Industries should obtain written approval from the POTW for the discharge.  It is recommended that the blowdown be containerized in a container labeled, “Used Oil” and discharged through the facilities wastewater discharge system via the wastewater discharge permit. | Bria | 7-10-19 |
| BG Products | Need individual authorization for floor scrubber water from City of Derby POTW to discharge | 40 CFR 403.5(b) and (c) |  | Curtis | 7-27-21 |
| Global Parts | Need individual authorization for mop bucket water (See Photo 1) from City of Augusta POTW to discharge. | 40 CFR 403.5(b) and (c) | If discharging non-domestic (industrial) wastewater to the POTW, written approval must be obtained from the POTW for the discharge in the form of an individual authorization. | 8-19-21 | Curtis |
| Pet-Ag | The facility does not have written individual authorization for industrial wastewater discharges including sanitation chemicals and mop bucket water from Village of Hampshire POTW to discharge. | 40 CFR 403.5(b) and (c) | If discharging non-domestic (industrial) wastewater to the POTW, written approval must be obtained from the POTW for the discharge in the form of an individual authorization. | 9-14-21 | Curtis |
| Learjet – Wichita | No records were available to demonstrate that a self-monitoring report had been submitted for Outfall 2 (Site Code BOMB003) for the second half of 2018. Analytical records for the time period were available for the outfall, but the results appear not to have been submitted to  the city. | City of Wichita Wastewater Discharge Permit 2032, September 25, 2017,  Sections IV and V | Semi-annual sampling must be completed for parameters identified in the permit for Outfall 2 (Site Code BOMB003). Self-monitoring reports must be submitted by the last day of the month following the reporting period (e.g., January 31 for the previous July through December). | June 2019 | Golder |
| Max | Wastewater pH calibrations are not being checked against a different lot number of pH buffer solution,   1. After calibration and before sample testing and,   After sample testing. | K.A.R. 28-15-36(a)(f) | Add additional steps in the daily pH calibration to check the pH probe against another lot number of pH buffer solution with a pH of 7 before and after sampling testing. The pH probe must be ± 0.1 pH on the check step for NPDES compliance monitoring. | 11-24-21 | Curtis |
| Hillsboro Industries | Wastewater pH calibration is only being completed on a weekly or less basis (see Photo 1). | K.A.R. 28-15-36a(f)(2)  40 CFR 136 | Each instrument being used for field laboratory analysis shall be calibrated on each day of use. | 6-17-21 | Curtis |
| Hillsboro Industries | Employee personnel files were not available for employees completing pH monitoring. | K.A.R. 28-15-36a(h) | Complete a KDHE personnel information document for each employee conducting pH analysis and keep on file. | 6-17-21 | Curtis |
| Max | Employee personnel files were not available for employees completing wastewater pH monitoring. | K.A.R. 28-15-36a(h) | Complete a KDHE personnel information document for each employee conducting pH analysis and keep on file. | 11-24-21 | Curtis |
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| **Toxic Substance Control Act (TSCA) (40 CFR 700-799)** | | | | | |
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| USD259 | Drums of non PCB ballast were either not labeled or not dated (photos 40-42). | 40 CFR 761 | Ensure all ballast (PCB and non PCB) are dated when the first ballast is generated. Ballast waste must be shipped off-site within a year of generation. | Amanda | 7-30-18 |
| USD259 | PCB and non PCB ballasts are not being segregated. All drums are labeled as non PCB | 40 CFR 761 | PCB and non PCB ballasts must be segregated. PCB ballasts must also contain a warning label noting that they contain PCBs. | Amanda | 7-30-18 |
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| Hillsboro | PCB/non PCB ballast was observed abandoned in the facility. (Photo 11) | 40 CFR 761 | Ensure all ballast (polychlorinated biphenyl (PCB) and non-PCB) are dated when the first ballast is generated. Ballast waste must be shipped off-site within a year of generation.  PCB and non PCB ballasts must be segregated. PCB ballasts must also contain a warning label noting that they contain PCBs. | Bria | 7-10-19 |
| **Department of Transportation (DOT) (49 CFR 100-180)** | | | | | |
| Ultra Clean Midwest | Based on recent hazardous waste manifests, the facility is offering quantities of hazardous material that require placarding but is not registered with the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration (PHMSA). Facility registration expired 6-30-2020. Manifest on 11-15-21 shipped 26,240 pounds of a Class 8 substance. Class 8 corrosive liquids require placarding at 1,001 pounds. Offerors and transporters of certain quantities and types of hazardous materials, including hazardous wastes, are required to file a registration statement with the U.S. Department of Transportation and to pay a fee. | 49 CFR 107.601(a) | Submit a renewal registration to the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration for activities as a shipper along with applicable fee for the facility. Registrations can be completed on one, two, or three-year frequencies and must be completed by June 30th of the expiring year. | 12-8-21 | Curtis |
| CK Technologies – Mount Airy, North Carolina | Based on recent hazardous waste manifests, the facility is offering quantities of hazardous material that require placarding but are not registered with the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration (PHMSA). Manifest on 2-4-21 shipped 1,500 pounds of a Class 3 substance and manifest on 3-12-21 shipped 1,200 pounds of a Class 3 substance. Class 3 flammable liquids required placarding at 1,001 pounds. Offerors and transporters of certain quantities and types of hazardous materials, including hazardous wastes, are required to file a registration statement with the U.S. Department of Transportation and to pay a fee. | 49 CFR 107.601(a)(6) | Submit an initial registration to the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration for activities as a shipper along with applicable fee for the facility. Registrations can be completed on one, two, or three-year frequencies and must be completed by June 30th of the expiring year. | 4-14-21 | Curtis |
| Global Parts | Based on recent hazardous waste manifests, the facility is offering quantities of hazardous material that require placarding but are not registered with the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration (PHMSA). Manifest on 3-30-21 shipped 4,660 pounds of a Class 3 substance. Class 3 flammable liquids required placarding at 1,001 pounds. Offerors and transporters of certain quantities and types of hazardous materials, including hazardous wastes, are required to file a registration statement with the U.S. Department of Transportation and to pay a fee. | 49 CFR 107.601(a)(6) | Submit an initial registration to the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration for activities as a shipper along with applicable fee for the facility if future shipments exceed thresholds. Registrations can be completed on one, two, or three-year frequencies and must be completed by June 30th of the expiring year. See Appendix E for placarding weights. | 8-19-21 | Curtis |
| Perfekta | Based on recent hazardous waste manifests, the facility is offering quantities of hazardous material that require placarding but are not registered with the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration (PHMSA). Manifests on 12-10-21 shipped 1,400 pounds, 10-25-21 shipped 1,200 pounds, and November 2020 shipped 1,200 lbs of class 4.1 flammable solids which required placarding at 1,001 pounds. Offerors and transporters of certain quantities and types of hazardous materials, including hazardous wastes, are required to file a registration statement with the U.S. Department of Transportation and to pay a fee. | 49 CFR 107.601(a)(6) | Submit an initial registration to the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration for activities as a shipper along with applicable fee for the facility if future shipments exceed thresholds. Back registrations can be completed as well for prior years. Registrations can be completed on one, two, or three-year frequencies and must be completed by June 30th of the expiring year. See following pages for placarding weights. | 7-27-22 | Curtis |
| Vermillion | DOT training documents were missing for Willis Pearrow and Grant Williams. | 49 CFR 172.204 – 205  49 CFR 172.704(d) | Ensure that copies of all training records are kept for a minimum of 3 years. | Amanda | 7-23-18 |
| Learjet – Wichita | Biomedical wastes are DOT hazardous  materials when transported. No records of  DOT hazardous materials transportation training were available for two employees who signed biomedical waste shipping papers on  August 8, 2017 and April 17, 2018. | 49 CFR 172 Subpart H | A hazmat employer shall ensure that each of its hazmat employees receives general awareness/familiarization training, function-specific training, safety training, and security awareness training at least once every three years. | June 2019 | Golder |
| Learjet – Dallas | Records of DOT hazardous materials transportation training or hazardous waste management training completed before the time of waste shipment were not available for the person who signed manifest | 49 CFR 172 Subpart H  30 TAC 335.69(f)(5)(c) | A hazmat employer shall ensure that each of its hazmat employees receives general awareness/familiarization training, function-specific training, safety training, and security awareness training at least once every three years.  The generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies. | Sept 2019 | Golder |
| CK Technologies – Mount Airy, North Carolina | Employees signing off on hazardous waste manifests are getting DOT hazardous materials training, but the training only covers the standard operating procedures for their tasks. Hazmat employee training is required to cover (1) general awareness/familiarization training, (2) function-specific training, (3) safety training, and (4) security awareness training. | 49 CFR 172.704(a) | Retrain DOT hazardous materials employees who sign hazardous waste manifests to the full extent of the training requirements for hazmat employees. Recurrent training must be completed on a three-year frequency. | 4-14-21 | Curtis |
| Ultra Clean Midwest | Employees signing off on hazardous waste manifests are not getting DOT hazardous materials training. Hazmat employee training is required to cover (1) general awareness/familiarization training, (2) function-specific training, (3) safety training, and (4) security awareness training. | 49 CFR 172.704 | Train DOT hazardous materials employees who sign hazardous waste manifests to the full extent of the training requirements for hazmat employees. Recurrent training must be completed on a three-year frequency. | 12-8-21 | Curtis |
| Cascade Engineering – Montpelier, Ohio | The employee signing off on hazardous waste manifests last had DOT hazardous materials training on 1-16-2017, exceeding the 3-year frequency requirement for refresher training. | 49 CFR 172.704(c)(2) | Retrain the DOT hazardous materials employee who signs hazardous waste manifests to the full extent of the training requirements for hazmat employees. Recurrent training must be completed on a 3-year frequency. | 12-16-21 | Curtis |
| USD259 | At the time of the audit it was unclear if the service center was shipping amounts of hazardous waste that would require an annual DOT Registration through PHMSA. | Recommendation | iSi recommends reviewing whether the threshold has been met that would require this registration. | Amanda | 7-30-18 |
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| **Opportunities For Improvement** | | | | | |
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| USD 259 | Several empty drums were observed with hazardous waste labels (photo 23). | Recommendation | Do not label drums with hazardous waste label until drum is in use. | Amanda | 7-30-18 |
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