

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Bob Holden, Governor • Stephen M. Mahfoud, Director

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DIVISION OF ENVIRONMENTAL QUALITY MAY 22 2001

Kansas City Regional Office
500 NE Colbern Road
Lee's Summit, MO 64086-4710
(816) 622-7000
FAX (816) 622-7044

HAZARDOUS WASTE PROGRAM
MISSOURI DEPARTMENT OF
NATURAL RESOURCES

May 18, 2001

Mr. Jerry Groom,
Electronic Technician
Federal Aviation
Administration Staging
633 Hardesty, Building #6
Kansas City, MO 64015

RE: Notice of Violation #4974

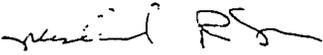
Dear Mr. Groom:

The Kansas City Regional Office of the Missouri Department of Natural Resources has received and reviewed your April 20, 2001, response to the above referenced Notice of Violation. Your response adequately addresses unsatisfactory feature 1. With your latest response the violation noted at the inspection of March 2, 2001, has been satisfactorily addressed.

The department appreciates your cooperation in correcting the hazardous waste violation observed during the inspection. Should you have any questions please contact me at (816) 622-7000.

Sincerely,

KANSAS CITY REGIONAL OFFICE


Michael R. Miller
Environmental Specialist

JRM/mmg

c: Ms. Kathy Flippin, Hazardous Waste Program

Jackson County
Federal Aviation Administration Staging

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U.S. Department
of Transportation

Central Region
Iowa, Kansas
Missouri, Nebraska

901 Locust Street, Suite 200
Kansas City, Missouri 64106-2461

Federal Aviation
Administration

APR 19 2001

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HAZARDOUS WASTE PROGRAM
MISSOURI DEPARTMENT OF
NATURAL RESOURCES

SPECIAL DELIVERY--CERTIFIED

Mr. James R. Macy
Regional Director
Missouri Department of Natural Resources
Division of Environmental Quality
Kansas City Regional Office
500 NE Colbern Road
Lee's Summit, MO 64086-4710

Dear Mr. Macy:

Response to Notice of Violation # 4974
FAA Staging Area, 633 Hardesty, # 6, Kansas City, MO 64015
EPA ID: MO2210090062 MO Generator ID: 010204

On March 2, 2001, the Missouri Department of Natural Resources (MDNR) conducted an un-announced inspection at the FAA Staging Area facility located at 633 Hardesty, Building # 6, Kansas City, Missouri 64124. The inspection was a compliance evaluation inspection (CEI) that was conducted pursuant to the authority provided under the Resource Conservation and Recovery Act (RCRA) of 1976. During the inspection, FAA was issued a Notice of Violation (NOV) for:

- Failure to update hazardous waste registration and,
- Failure to determine whether spent paint waste filters are hazardous.

This letter constitutes the FAA's response to the aforementioned NOV. The NOV required the FAA to provide a written response within 15 days describing either the actions taken or a schedule for completion of all necessary actions to correct the violations. FAA provided MDNR with the initial response within the date specified in the NOV.

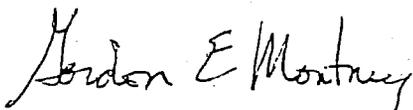
The citation regarding the facility's status as a generator was subsequently withdrawn by MDNR after the inspector rechecked the computer database subsequent to the inspection. This withdrawal of citation/violation was communicated to the FAA through the CEI report of ~~March 16, 2001. Therefore, it is our understanding that no further response is required from the~~ FAA.

To respond to the citation regarding the potentially hazardous nature of the spent paint waste filters, FAA contract support personnel collected a representative sample of the waste on March 23, 2001. The sample was hand delivered to M.D Chemical and Testing, Inc., in Lenexa, Kansas for analysis of metals using the toxicity characteristic leaching procedure (TCLP). The analysis was conducted using SW-846 method 1311 as required by RCRA (codified in 40 CFR 261.24). A copy of the chain-of-custody record and the analytical data is enclosed.

The resulting data indicates that with the exception of barium, all the other analytes levels present were below the method detection limits. Barium was detected at a concentration of 7.8 milligrams per liter. Also, the concentration of barium was well below the regulatory threshold (40 CFR 261.24) of 100 milligrams per liter. Based on the analytical data, it has been determined that the spent paint waste filters generated at the FAA Staging area are not hazardous.

At this time, the FAA is not contemplating any additional follow up work relating to MDNR's inspection, unless directed otherwise by the MDNR. If you require additional information, please contact Jerry Groom, at (816) 241-8390.

Sincerely,



Thomas A. Curtis
Manager, Kansas City NAS Implementation Center

Enclosure

✓ cc: Ms. Kathy Flippin, Chief, Hazardous Waste Enforcement Unit, P.O. Box 176,
Jefferson City, Missouri 65102

Mr. Scott Lueckert, NATCA Representative, ANI-520