

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Physical and Mailing Address

Lockheed Martin Space Company (LMS)
5100 Standby Road
Stennis Space Center, Mississippi 39529

3) Responsible Officials

Rick Hammers, Senior Manager, Environmental Safety and Health
Lockheed Martin Space

4) Inspection Participants

Daryl R. Himes, US EPA
Brad Justice, Mississippi Department of Environmental Quality (MDEQ)
Rick Hammers, Lockheed Martin Space Systems Company (LMS)
Dustin Ard, LMS

5) Date of Inspection

February 24, 2021

6) Applicable Regulations

Mississippi Code of 1972, Miss. Code Ann. § 17-17-1 *et seq.* [Resource Conservation and Recovery Act (RCRA) Sections 3002, 3004, 3005, 3007 and 3008, (42 U.S.C. §§ 6922, 6924, 6925, 6927 and 6928)] and the Mississippi Department of Environmental Quality, Office of Pollution Control, Mississippi Hazardous Waste Management Regulations (MHWMR), 11 Miss. Admin. Code Pt. 3, R. 1.1-1.24, which adopts and incorporates by reference 40 C.F.R. Parts 260-270, 273, and 279 [40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273, and 279].

As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

7) **Purpose of Inspection**

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine the LMS's compliance with the applicable requirements of RCRA and the corresponding MDEQ regulations. This was an EPA lead inspection.

8) **Previous Inspection History**

The last RCRA compliance evaluation inspection was performed at the facility on January 27, 2009 by MDEQ personnel. No violations were observed.

9) **Facility Description**

LMS is located on the property of the Stennis Space Center. The facility currently employs approximately 140 personnel working within a 330,000 square foot building. A fence around the perimeter of Stennis Space Center and security access to the building is used to control access to plant operations.

The facility last notified as a small quantity generator of hazardous waste on February 25, 2021. Hazardous wastes included on the notification were D001 (ignitable), D002 (corrosive), D009 (mercury), D010 (selenium), D011 (silver), F003 and F005.

During the opening conference, the facility personnel described the facility's operations as subassembly operations performed on satellites. All components which are part of the subassembly operations performed at this facility are currently manufactured at other manufacturing facilities and brought to this facility for assembly.

The subassembly operations performed at this location include the installation of engines, fuel lines and electrical components onto satellites. During these assembly operations, facility personnel stated that hazardous wastes generated during these operations include spent isopropyl alcohol contaminated rags, excess two-part epoxies, spent x-ray developer and universal wastes.

10) **Opening Conference**

On February 24, 2021, EPA inspector Daryl R. Himes, accompanied by MDEQ inspector Brad Justice, arrived at LMSSC at approximately 9:00 a.m. Rick Hammers and Dustin Ard of LMS, immediately received the inspectors. The inspectors introduced themselves, showed their credentials to Rick Hammers, and explained the purpose of the visit. The inspectors described the anticipated use of a digital camera during the inspection and provided a request for records.

The LMS representatives provided an overview of the facility's history and current operations during the opening conference. The company does not appear to meet the Small Business Regulatory Enforcement Fairness Act's classification of a "small business," which is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. Therefore, the EPA inspector did not provide a copy of the agency's information sheet for small businesses, which can be found at

11) **Findings**

A walk-through inspection of the LMS facility was performed in the following areas:

Stock Room

Parts and supplies for the operation of the facility are maintained in this area. At the time of the inspection, two small containers (less than pint size), were observed in a satellite accumulation area in this room. Each of these containers managed expired uncured two-part epoxy. The containers were closed, marked with the words “Hazardous Waste” and an indication of the hazard of the contents.

Ten-K Clean Room

This area is used for the installation of electrical components on satellites. A 7.5-gallon container of spent isopropyl alcohol wipes was observed in a satellite accumulation area in this room. The container was closed, marked with the words “Hazardous Waste” and an indication of the hazard of the contents.

Ammonia Change Station

This area was currently under construction and will be used for the assembly of heat exchanger components. No hazardous waste was observed in this area at the time of the inspection.

Electroplating Area

This area was also currently under new construction (Photos 1 & 2) and will be used in the future for electroplating and possible chemical conversion coating of various parts. No hazardous wastes were observed in this area at the time of the inspection. After the CEI, a phone meeting was conducted on March 4, 2021, between representatives of the EPA, MDEQ, LMS and the operator of the Stennis Space Center wastewater treatment plant.

During this conversation, it was determined that the wastewater treatment plant operated on Stennis Space Center was a private treatment works. It was also established that LMS would not send any wastewaters from electroplating or chemical conversion coating operations to the Stennis Wastewater Treatment Plant. The wastewaters which would be sent to the plant would be from metal cleaning operations using soap to remove oil and dirt from parts that would be plated.

Hazardous Waste Accumulation Area

This area consisted of a fenced cage on top of a bermed concrete pad beneath a metal roof (Photo 3).

One 30-gallon container of spent x-ray fixer (D002 corrosive hazardous waste) was observed in

this area at the time of the inspection. The container was closed, marked with the words “Hazardous Waste,” an accumulation start date (2/22/2021) and an indication of the hazard of the contents. One 5-gallon container of nonhazardous alkaline batteries was also observed in this area. The area was equipped with a fire extinguisher and spill equipment at the time of the inspection.

A cage located within a building located adjacent to the Hazardous Waste Accumulation Area for the management for electronic waste was empty at the time of the inspection (Photo 4).

Precision Clean Area

This area is used for parts cleaning operations and was equipped with one nonhazardous solvent part washer. No hazardous wastes were present in this area at the time of the inspection.

X-Ray Dark Room

This area is used for the X-ray of parts for quality control. Two 30-gallon containers (Photo 5) of hazardous waste were managed within SAAs in this area at the time of the inspection. One of the containers managed spent x-ray developer. The other container managed spent lead materials from the x-ray process. Each of the containers were closed, marked with the words “Hazardous Waste” and an indication of the hazard of the contents.

Dimensional General-Purpose Test Equipment Area

This area was used for various equipment calibrations.

A 5-gallon container of nonhazardous spent alkaline batteries was observed in this area at the time of the inspection. No hazardous wastes were observed in this area.

Record Review

A review of one hazardous waste manifest accompanying one shipment of hazardous waste off-site in the past 6 months indicated that the facility was operating well under the threshold of operating as a very small quantity generator of hazardous waste and not subject to inspection record, contingency plan and training records at the time of this inspection.

12) **Signed**

Daryl R. Himes
Environmental Engineer

Date

Concurrence

Araceli B. Chavez
Chief
RCRA Enforcement Section
Chemical Safety and Land Enforcement Branch

Date

ATTACHMENT A

Lockheed Martin Space Systems, Inc.

Stennis Space Center, Mississippi

COMPLIANCE EVALUATION Inspection

MSR000100834

February 24, 2021

Photos taken by Daryl R. Himes



Photo 1 – New Electroplating Area



Photo 2 – New Electroplating Area



Photo 3 – Hazardous Waste Accumulation Area





Photo 5 – X-ray Dark Room