

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Honeywell International
1 Cliff Garrett Drive
Oxford, Alabama 36203
Calhoun County

EPA ID No.: ALR000043340

3) Responsible Officials

Mr. Andrew Schmit
Honeywell International
1 Cliff Garrett Drive
Oxford, Alabama 36203
andrew.schmit@honeywell.com
(256) 835-4241

4) Inspection Participants

Andrew Schmit, Honeywell International
Drew Phillips, Alabama Department of Environmental Management
William Kappler, Environmental Protection Agency, Region 4

5) Date and Time of Inspection

August 19, 2020, at 9:00 a.m.

6) Applicable Regulations

Alabama Hazardous Waste Management and Minimization Act of 1978 (AHWMMA), Ala. Code § 22-30-1 *et seq.*, [Resource Conservation and Recovery Act (RCRA) Sections 3002 - 3005, (42 U.S. Code - Annotated U.S.C.A. 6925 and 6927)] and rules 335-14-1 to 335-14-17 (2016 and 2018) of the Alabama Department of Environmental Management (ADEM) Administrative Code (ADEM Admin. Code) [40 Code of Federal Regulation (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

On August 17, 2020, inspectors from the EPA and ADEM contacted Honeywell International to discuss a RCRA CEI. EPA procedure is to provide the facility with at least 24 hours-notice prior to the RCRA CEI. Inspectors identified themselves, explained the purpose of the RCRA CEI and the date and time of the RCRA CEI. EPA explained the health and safety procedures, general areas for inspection, equipment that will be used, and the RCRA records needed for review. Honeywell International representatives identified themselves, explained the facility operational status, health and safety procedures, and record review information. Honeywell International is currently operating with a reduced staff. A face mask, social distancing, and hand-washing practices are observed at the facility. The facility requires completion of a self-assessment certification form and a temperature check for visitors.

After the meeting, the EPA sent an email to Honeywell International to confirm the date and time of the RCRA CEI, attached a business card and a list of the RCRA records needed for review. Honeywell International confirmed the date and time, provided a diagram with the locations of satellite accumulation areas, a site overview of the facility's operations, and a self-assessment certification form.

On August 19, 2020, inspectors from the U.S. Environmental Protection Agency, Region 4, and the Alabama Department of Environmental Management (ADEM) conducted an announced CEI at Honeywell International, (hereinafter, "Honeywell" or the "facility") to determine its compliance status with the RCRA and the State of Alabama regulations. This was an EPA-lead inspection. Inspectors arrived at Honeywell and were greeted by facility representatives. Inspectors introduced themselves, showed credentials, exchanged business cards, and explained the purpose of the visit during an entrance briefing.

The facility asked the inspectors to complete the self-assessment information concerning the COVID-19 Pandemic. The inspector's temperature was checked by the facility using a non-contact digital thermometer.

8) Facility Description

Honeywell is located at 1 Cliff Garrett Drive, Oxford, Calhoun County, Alabama. The facility has been at this location since 1987. The facility employs approximately 100 people and operates Monday through Thursday, 10-hours per day. The facility consists of one building with approximately 94,700 square feet of space. The City of Oxford provides potable water and the domestic waste services. The primary NAICS code for the facility is 336413.

Honeywell submitted an annual notification of its regulated waste activity to ADEM on July 18, 2019, notifying as a small quantity generator of hazardous waste (SQG) and a small quantity handler of universal waste (SQHUW).

9) General Process Description

Honeywell specializes in the repair and refurbishment of small aircraft components such as actuators, gearboxes, starters, turbines, and valves. The facility's single building includes an office area, a large production area, a paint shop/room (where parts are painted after being repaired), a clean line (where parts are cleaned using a variety of solvents and cleansers), a maintenance area (where maintenance is performed on Honeywell's equipment and machinery), an on-site waste water treatment plant, a central accumulation area and several satellite accumulation areas for the management of hazardous waste. The production area consists of a series of small workstations where facility personnel disassemble, repair, and reassemble components by hand. These work stations occupy the majority of the building and are divided into the following sections; a gearboxes area (where gearboxes are disassembled, cleaned, repaired, and reassembled), an air motors area (where aircraft motor components are cleaned and repaired), a turbines area (where turbine components are cleaned and repaired), an actuator area (where actuators are cleaned and repaired), and a valves area (where valves are cleaned and repaired).

According to Mr. Schmit, Honeywell is preparing to relocate to Tempe, Arizona. The facility is downsizing the operations in September and October 2020 and preparing to complete the shutdown by December 21, 2020.

10) Previous Inspection History

Honeywell was last inspected by the ADEM on September 1, 2015. The facility was cited for not labeling one satellite accumulation container of hazardous waste in the air motors area, not marking a date on one container of hazardous waste in the central hazardous waste accumulation area, and not documenting that copies of the latest version of the facility's contingency plan had been delivered to the local emergency response agencies.

Honeywell has never previously been inspected by the EPA, Region 4 for compliance with the federal and the State of Alabama hazardous waste regulations

11) Findings

The information in this RCRA inspection report is based on the EPA's August 19, 2020, RCRA compliance evaluation inspection.

Motors/Machine Area

There is a satellite accumulation area (SAA) on the main manufacturing area of the production floor. Inspectors observed one 30-gallon metal container accumulating hazardous waste paint related material and debris. The container was closed, in good condition, labeled with the words hazardous waste and labeled with the word flammable to indicate the hazard of the container contents.

Gearbox Area

There is a SAA in this area of Honeywell's main production floor. Inspectors observed two 30-gallon metal containers accumulating hazardous waste in different areas of the production floor. One container was accumulating waste solvent and the second container was accumulating bench top waste (Q-tips, swabs, wipes, cups contaminated with solvent). The containers were closed, in

good condition, labeled with the words hazardous waste and labeled with the word flammable to indicate the hazard of the container contents.

Paint Shop

There is a SAA in the paint room. The room is constructed of cinderblocks and has two open, negative-pressure paint booths to apply paint and other coatings to aircraft components using paint guns. A paint gun cleaner is used to clean the paint guns. Inspectors observed one 55-gallon container accumulating paint-contaminated solids and one 55-gallon container with a funnel inserted in the top of the container accumulating waste paint and solvent. The containers were closed, in good condition, labeled with the words hazardous waste, and labeled with the word flammable to indicate the hazard of the container contents.

Turbine Area

This area is in Honeywell's main production floor. Inspectors observed three 1.5-gallon containers accumulating waste lithium, alkaline, and NiCad batteries. The containers were approximately one-quarter to one-half full, closed, in good condition, labeled with the words universal waste, and marked with the dates January 26, 2016, May 19, 2016, or May 20, 2016 (photographs 1 and 2). Mr. Schmit explained that the operator of this area had not changed the date on the containers and that universal waste is shipped about every three months. A review of the facility's universal waste records found universal waste is shipped approximately every three to four months. On August 19, 2020, Honeywell provided several pictures in an email to EPA showing the universal waste batteries were packaged for shipping to a destination facility and the three 1.5-gallon containers were marked with new universal waste labels and marked with the date August 19, 2020.

There is a SAA in this area of the main production floor. Inspectors observed one 55-gallon container accumulating waste aerosol cans and one 30-gallon container accumulating waste cleaning solvent. The containers were closed, in good condition, labeled with the words hazardous waste, and labeled with the word flammable to indicate the hazard of the container contents.

Actuator Area

There is a SAA in this area of the main production floor. Inspectors observed one 30-gallon container accumulating bench top waste (Q-tips, swabs, wipes, cups contaminated with solvent). The container was closed, in good condition, labeled with the words hazardous waste, and labeled with the word flammable to indicate the hazard of the container contents.

Valves Area

There is a SAA in this area of the main production floor. Inspectors observed one 30-gallon container accumulating bench top waste (Q-tips, swabs, wipes, cups contaminated with solvent). The container was closed, in good condition, labeled with the words hazardous waste, and labeled with the word flammable to indicate the hazard of the container contents.

Electronics/Solder Area

There is a SAA in a large room separated from the main production floor. Inspectors observed one five-gallon container accumulating waste solder and rosin. The container was closed, in good condition, and labeled with the words hazardous waste. The container was not marked or labeled with an indication of the hazard of the container content. Mr. Schmit marked the hazardous waste label with the word "toxic" to indicate the hazard of the container contents.

¹Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a), [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with ADEM Admin. Code r. 335-14-3-.01(6)(b) or (7)(a), [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in Admin. Code r. 335-14-3-.01(a)(7) and (8), [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in ADEM Admin. Code r. 335-14-3-.01(5)(a), [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(6)(b)6.(i), [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a SQG is required to mark or label its containers with an indication of the hazards of the contents.

Clean Line Room

Honeywell operates a clean line located in a cinderblock room. The clean line consists of a series of ten cleaning and rinse water vats, each with a capacity of approximately 200 gallons. According to Mr. Schmit, corrosive cleaning solutions and rinse water is treated in the on-site wastewater treatment facility. The various cleaning solutions and solvents that cannot be treated are managed in containers for off-site shipment to a destination facility.

Wastewater Treatment Facility

Honeywell operates an on-site wastewater treatment facility (WWTF) to treat wastewater generated from a series of tanks in the Clean Line Room. The wastewater is treated with sodium hydroxide and sulfuric acid prior to being discharged to a publicly owned treatment works. The WWTF is located outside, adjacent to the Central Hazardous Waste Accumulation Area. It is staged on a concrete pad and covered by a corrugated metal overhang. Inspectors did not observe hazardous waste accumulating in this area at the time of the inspection.

Central Accumulation Area

The Central Accumulation Area (CAA) is located outdoors next to the WWTF. The CAA is an enclosed two-door metal chemical storage unit. The CAA is equipped with a grated metal floor suspended over a built-in secondary containment system. The CAA is vented to the outside air. Signs were observed with the words “Danger”, “No Smoking”, “No Open Flames”, “No Sparks”, and Authorized Personnel Only” on the storage unit. Inspectors observed spill control and emergency equipment inside the CAA. Inspectors did not observe hazardous waste accumulating in the CAA at the time of the inspection. Inspectors observed emergency contact information posted on the inside door to the CAA. Inspectors observed the phone numbers for facility staff and for the local authorities on the posted information (photograph 3).

¹ “ADEM’s newly adopted Generator Improvements Rule (GIR) regulations (effective on April 6, 2018) are currently under review by the EPA and have not yet been authorized. However, for ease of reference and for consistency with the State Inspection Report, this CEI Report will cite to the Alabama and federal hazardous waste regulations as amended by the GIR. New requirements that have become effective pursuant to the GIR, but have not yet been authorized, are noted with an asterisk. These provisions are effective and enforceable as a matter of State law but are not federally enforceable.”

12) **Waste Management Practices**

Hazardous waste is generated from the cleaning, painting, maintenances and repair of aircraft components. The facility generates waste cleaners, solvents, paint related solid debris, paint and solvent, and waste solder and rosin (D001, D002, D005, D006, D007, D008, D010, D011, D035, F003, and F005). The facility prepares the hazardous waste for packaging and on-site management, prior to shipping the hazardous waste using the manifest system to a treatment, storage or disposal facility (TSDF).

Honeywell used the following transporters in 2018 through 2020.

Safety Kleen Systems, Inc. – TXR000081205

Clean Harbors Deer Park – TXD055141378

Clean Harbors Deer Park – MAD039322250

Honeywell used the following TSDF in 2018 through 2020.

Safety Kleen Systems, Inc. – KYD053348108

Spring Grove Resource Recovery Inc. – OHD000816629

13) **Record Review**

Manifests

The manifests for the shipment of hazardous waste from January 18, 2018 to July 9, 2020 were reviewed.

Seven hazardous waste manifests were reviewed using EPA's E-Manifest Record System, for shipments in January 2020 to July 2020.

Universal Waste Manifests

The manifests for the shipment of universal waste batteries and lamps from October 2018 to August 2020 were reviewed. Based on the manifests reviewed it appears universal waste is shipped approximately every three to four months.

Contingency Plan

The facility's contingency plan (Plan) was reviewed. The Plan was amended on February 15, 2018.

Posted Emergency Contact Information

Inspectors observe emergency information posted in the CAA.

Arrangements with Local Authorities

The arrangement with the local authorities were reviewed.

Weekly Container Inspection Records

The weekly container inspection records for 2017, 2018, 2019, to the present were reviewed.

Personnel Training

The RCRA training certificates and training records for nine employees handling and managing hazardous waste were reviewed. The training is given at the facility by Safety Kleen Systems on 40 C.F.R 262 through 272 regulations. Training certificates for training given on March 12,

2020, February 17, 2019, February 19, 2018, and March 20, 2017 were reviewed.

Land Disposal Restriction Notice

The land disposal restriction documents were reviewed.

14) Exit-Briefing

Upon conclusion of the inspection, an exit briefing was conducted in the presence of Honeywell International representatives. The facility was informed of the findings at the time of the inspection.

15) Sampling Overview

Sampling was not conducted at this facility.

16) Conclusion/Summary of Violations

Based on the CEI conducted on August 19, 2020, Honeywell International was inspected as a small quantity generator of hazardous waste and a small quantity handler of universal waste.

17) Signed

William Kappler
Physical Scientist
Enforcement and Compliance Assurance Division

Date

18) Concurrence

Alan A. Annicella
Chief, Land Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch

Date

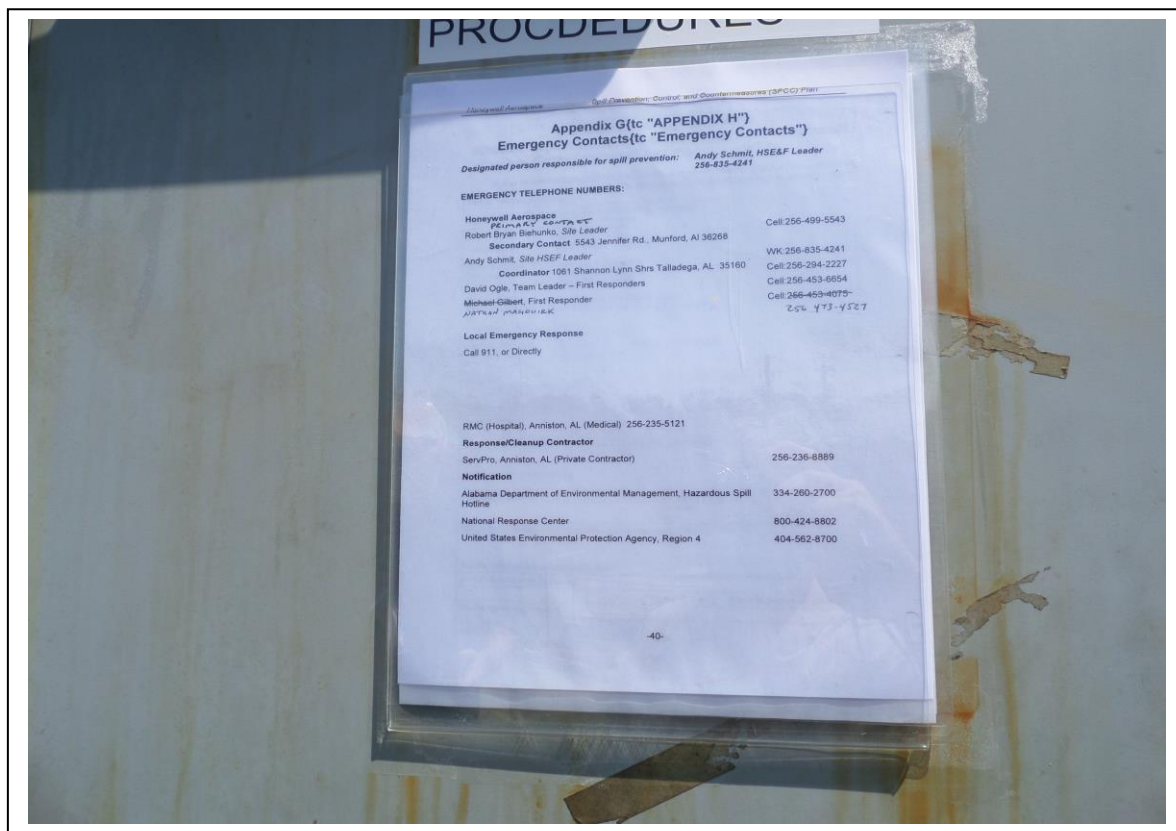
Honeywell International EPA ID.: ALR000043340
RCRA CEI Photographs
August 19, 2020
Photographs by William Kappler
Camera Model: Samsung WB250F
Property Tag #: S75917



at 11:40 a.m.



Honeywell International. Turbine Area. Inspectors observed three 1.5-gallon containers accumulating waste lithium, alkaline, and NiCad batteries. The containers were approximately one-quarter to one-half full, closed, in good condition, labeled with the words universal waste, and marked with the date January 26, 2016, May 19, 2016, or May 20, 2016. The facility shipped the universal waste to an off-site destination facility. Photograph 2 taken at 11:40 a.m.



Honeywell International. 180-Day or Less Accumulation Area. Inspectors observed the phone numbers for facility staff and for the local authorities on the posted information. Photograph 3 taken at 11:49 a.m.