

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Delta Flight Products, LLC ATL Operations (DFP)
3980 Tradeport Boulevard
Building 1200
Atlanta, Georgia 30354

EPA ID # - GAR 000 081 968

3) Responsible Official

Catherine Coleman
Manager, Safety, Compliance Systems and Records
Delta Flight Products

4) Inspection Participants

Daryl Himes, US EPA
Jasmine Flournoy, GA EPD
Terry Hewitt, DFP
Kaylie Savitz, DFP

5) Dates of Inspection

June 22, 2021

6) Applicable Regulations

Resource Conservation Recovery Act (RCRA), 42 U.S.C.A. §§ 6901 to 6992k Sections 3005 and 3007 of RCRA, 42 U.S.C.A. §§ 6925 and 6927 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273, and 279

The Georgia Hazardous Waste Management Act, §§ 12-8-60 to 83 of the Official Code of Georgia Annotated Chapter 391-3-11 of the Georgia Hazardous Waste Management Rules (GHWMR) (The Rules found in Chapter 391-3-11 were incorporated by reference 40 C.F.R. Parts 260-270, 273, and 279.

Therefore, the citations in this report will be to the Rules found in 40 C.F.R. Parts 260-270, 273, and 279.)

7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the facility's compliance with all applicable RCRA regulations.

8) Facility Description

The DFP facility consists of one building constructed on a concrete slab which is on 8.93 acres in the Tradeport Business Park. The facility is an administration center for engineering, production, and warehousing of aircraft interiors. The building, as constructed, has 110,000 square feet of space which contains office, warehouse, and manufacturing operations. The facility's operations are broken down into two sides of the building. One side is called the "Metal Shop", the other side is called "Composites".

The operations performed by the facility include the design and manufacturing of machine parts, cut and formed metals, composite panels and cabin avionics. Raw materials used by the facility include sheet metal and composite wood-based materials. Components manufactured include those for partitions, seats, and crew rests.

Composite material consisting of precured prepreg and honeycomb are cut to size and hand-laid into molds. Resins are applied and the assembly is vacuum sealed before being sent to a curing oven. The cured parts are removed from the molds and transferred to a router for machining. These parts are then sanded in preparation for being painted.

Sheet metal processing performed at the facility includes cutting, grinding, bending, shaping, and milling. Corrosion control is then performed on the stainless-steel metal which includes an acid passivation process using a sodium hydroxide solution. Corrosion control performed on aluminum products includes a chromium sulfate conversion coating process. Painting of these metals is also performed at the facility.

The facility filed its most recent Notification of Hazardous Waste Activity on March 3, 2020. The notification submitted by ADC indicated that the facility was a large quantity generator of D001, D002, D005, D007, and D035.

9) Findings

Upon arriving at DFP, the EPA and Georgia EPD representatives presented credentials to Terry Hewitt, Environmental Health and Safety Coordinator at the facility. The inspection proceeded with Terry Hewitt and Kaylie Savitz of DFP, the EPA, and GA EPD representatives. Prior to performing a walk-through inspection of the facility, a brief discussion was held with the facility representatives in a conference room which included the metal treatment and painting operations performed at the facility.

Below are the findings of the walk-through inspection.

Metal Shop Side

Metal Treatment

Composite wood and metal parts are both fabricated on this side of the facility.

Upon performing fabrication steps on the stainless steel parts, which include cutting, using a high pressure water tool, parts are dipped in a sodium hydroxide solution (17%) which is maintained as a bath in four tanks measuring 24" by 78" by 34" (approximately 300 gallons) as part of a passivation process. The tanks are each located within a paint booth type structure within the Metal Shop.

Aluminum parts undergo a conversion coating process within a bath of chromium sulfate solution. Seven tanks of the conversion coating solution are currently operated by the facility to perform this process. Each of these baths are located within the same paint booth at the facility in which the sodium hydroxide passivation process tanks are located. Each of the seven baths also measured 24" by 78" by 34" (approximately 300 gallons).

Upon becoming spent, the sodium hydroxide passivation and chromium sulfate conversion coating solutions are transferred into separate 275-gallon plastic totes within metal cages. The totes each had dimensions of 44" x 36" x 40".

At the time of the inspection, the two 275-gallon totes containing hazardous wastes from the baths discussed above were observed in an area close to the paint booth used to perform the metal finishing operations. One of the totes contained 23 inches of spent chemical conversion coating solution (Photos 1 & 2). One tote contained 5 inches of spent sodium hydroxide passivation solution (less than 55 gallons) (Photos 2 and 3). Neither of the two totes were labeled with the words "Hazardous Waste" or an indication of the hazard for either solution. The tote containing 23" inches of spent chemical conversion coating solution was not marked with an accumulation start date. A third tote containing a nonhazardous cleaning solution was also located in this area between the other two totes (Photos 1, 2 and 3). At the time of the inspection facility personnel stated that they thought the containers did not need to be labeled or dated until they were full.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17], a LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(5)(i)(A)((B)(C)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: the words "Hazardous Waste"; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container, respectively.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.

Metal and Composite Painting Operations

One paint booth, labeled “DFPMD-0013”, was located on this side of the building and was located next to the paint booth used for the metal treatment tank baths.

Two satellite accumulation areas (SAAs) were located within the paint booth.

One SAA was used for the collection of paint waste containing acetone. A 55-gallon drum with a funnel screwed into the bung hole was observed in this SAA. The funnel’s lid was fully open at the time of the inspection. The container also lacked any labels at the time of the inspection (Photo 4).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.

The second SAA was used for the collection of acetone and alcohol paint wastes. A 55-gallon drum with a funnel screwed into the bung hole was observed to have the funnel’s lid slightly ajar

and not latched at the time of the inspection (Photo 5). The container was labeled with the words “Hazardous Waste” and the waste code associated with the waste at the time of the inspection.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

90-Day Hazardous Waste Accumulation Area (Photo 6)

One 55-gallon drum of used oil labeled with a nonhazardous waste label with the words “Used Oil” written on the label was observed in this area (Photo 7)

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.17(1) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words “Used Oil.”

Two 55-gallon containers of paint waste were observed in this area. Each container was closed and labeled with the word “Hazardous Waste” and marked with an accumulation start date of less than 90 days. Neither of the drums were labeled with a hazard code or placard identifying the hazard associated with the waste (Photos 8 & 9).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with an indication of the hazards of the contents of each container.

One 275-gallon plastic tote within a steel cage was also observed in this area (Photo 10). The tote had approximately 27” of hazardous waste within it at the time of the inspection. The tote was closed and labeled with the words “Hazardous Waste.” The tote was not marked with an accumulation start date or labeled with a hazard code or placard identifying the hazard associated with the waste.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

Composites Side

This side of the facility consisted primarily of woodworking equipment for the various shaping activities of composites that are performed. High dust producing mechanical activities are performed within two separate paint booths.

One paint booth (DFPMD-0065) was used for painting activities on this side of the building.

At the time of the inspection, one SAA was observed within the paint booth. The SAA contained one 55-gallon drum for the accumulation of paint waste. The drum was not closed as the lid to the funnel was not latched and ajar. The container was not labeled with the word “Hazardous Waste” or marked a hazard code or placard identifying the hazard associated with the waste (Photos 11 and 12).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.

Record Review

The facility’s manifests, contingency plan, training records and inspection records were reviewed at the time of the inspection. In addition, following a June 29, 2021 phone conversation between Catherine Coleman and Daryl Himes of the EPA, additional documents, not available at the time of the inspection, were provided as attachments to an email sent to Daryl Himes on June 30, 2021. The attachments included weekly container inspections and hazardous waste training documentation.

No discrepancies were observed during a review of the facility’s contingency plan and manifests at the time of the inspection.

During an initial review of the facility’s hazardous waste training records during the 6/22/2021 on-site inspection, it was observed that the facility did not have records indicating the titles or positions of personnel at the facility responsible for the management of hazardous waste, the type of training required and personnel filling those positions. These records were provided in the June 30, 2021 email to the EPA.

In addition, Terry Hewitt did not have any records of hazardous waste training for 2020 at the time of the inspection. Daniel Silguero and Joseph Toney last had training on 3/10/2020. Updated training for each of these employees performed in the last week was provided.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(7)(iii)], which is a condition of the LQG Permit Exemption, Facility personnel must take part in an annual review of the initial training required by this section.

At the time of the inspection, the facility did not have any records to indicate that weekly inspections of the facility’s 90-day hazardous waste accumulation areas were being inspected weekly. Further, a quarterly safety inspection performed on 9/20/2020 indicated that weekly inspections were not being performed. A review of the facility’s submittal to Daryl Himes via

email found weekly inspections for the past three years. During this time period, weekly inspections were not performed during the following weeks:

July 15, 2018

July 22, 2018

December 2, 2018

Week of February 17, 2019 – Week of September 8, 2019 (30 weeks)

October 27, 2019

December 22, 2019

January 5, 2020

Week of March 22, 2020 – Week of May 24, 2020 (10 weeks)

Week of November 1, 2020 – December 27, 2020 (9 weeks)

Week of January 3, 2021 – June 13, 2021 (24 weeks)

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(1)(v)], which is a condition of the LQG Permit Exemption, a generator is required to, at least weekly, inspect central accumulation areas looking for leaking containers and for deterioration of containers caused by corrosion or other factors.

At the conclusion of the walkthrough inspection and record review, a brief review of the deficiencies observed during the inspection was performed with Terry Hewitt, Environmental Health and Safety Coordinator at the facility and Kaylie Savitz of DFP.

10) Signed

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Date: 2021.08.10 17:15:09 -04'00'

Daryl R. Himes
Inspector and Author of Report

Date

11) Concurrence and Approval

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ARACELI CHAVEZ
Date: 2021.08.10 20:30:28
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CHAVEZ

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

ATTACHMENT A

Delta Flight Products

Atlanta, Georgia

COMPLIANCE EVALUATION INSPECTION

GAR000081968

June 22, 2021

Photos taken by Daryl R. Himes



Photo 1 – Tote of spent chemical conversion coating solution.



Photo 2 – Tote of spent chemical conversion coating solution (on right) and tote of nonhazardous cleaning solution (center).



Photo 3 – Tote of spent sodium hydroxide passivation solution (on left) and tote of nonhazardous cleaning solution (on right).



Photo 4 – Container of Paint Waste in Paint Booth on the Metal Shop Side



Photo 5 – Container of Paint Waste in Paint Booth on the Metal Shop Side

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Photo 6 – 90-Day Hazardous Waste Accumulation Area



Photo 7 – Photo of Used Oil drum in 90-Day Hazardous Waste Accumulation Area

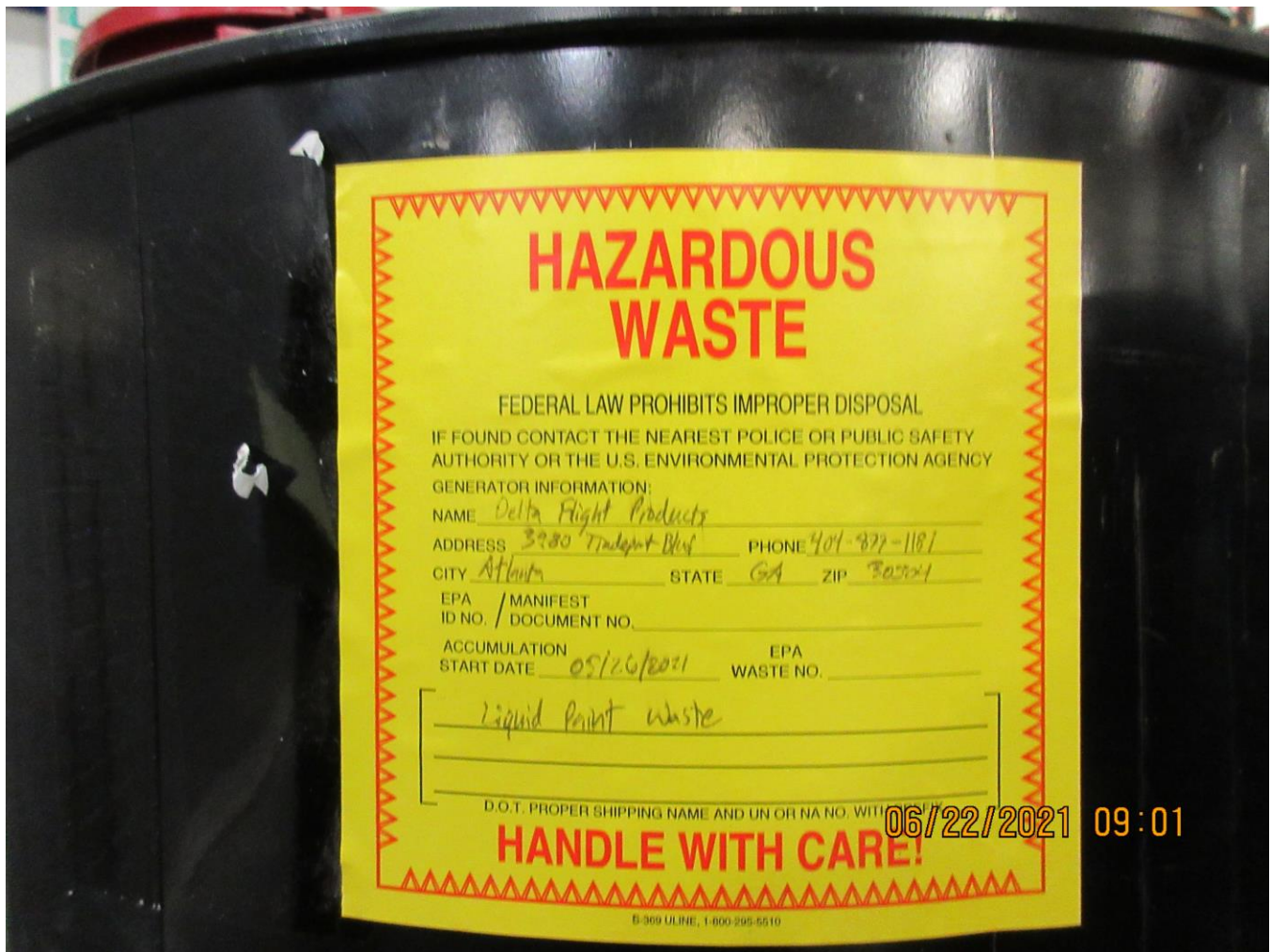


Photo 8– Label on Hazardous Waste Drum in 90-Day Hazardous Waste Accumulation Area

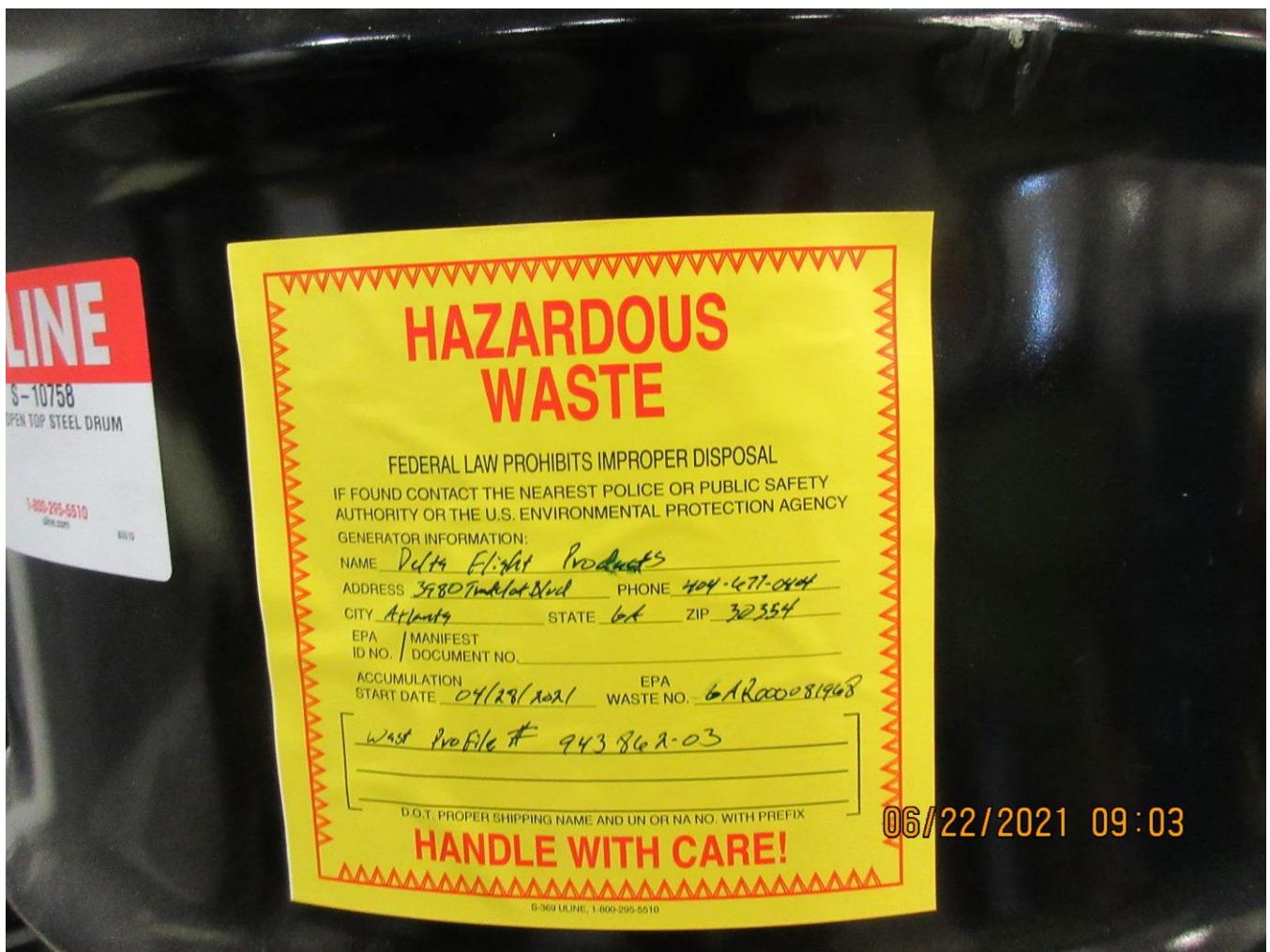


Photo 9– Label on Hazardous Waste Drum in 90-Day Hazardous Waste Accumulation Area

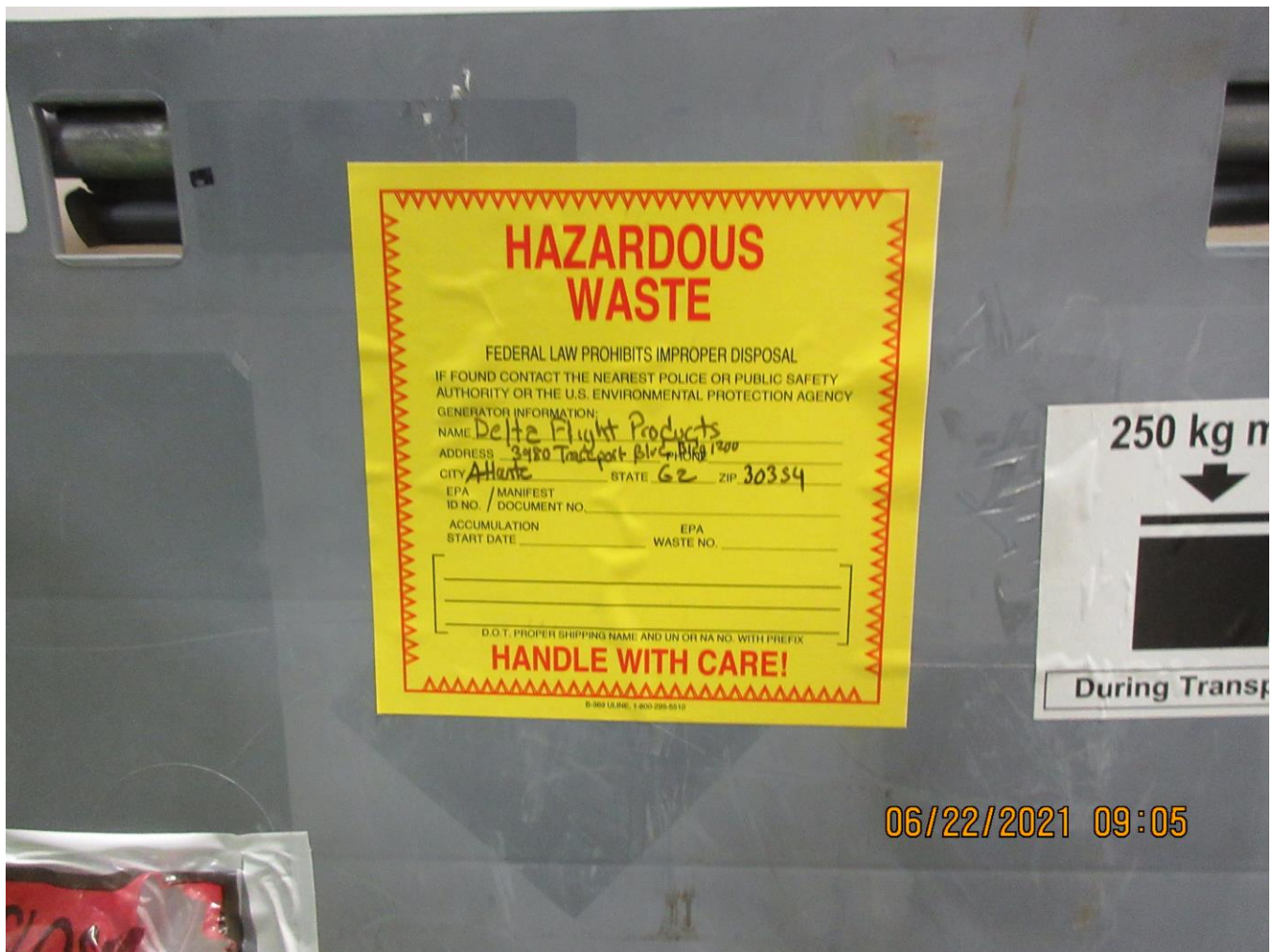


Photo 10– Label on Hazardous Waste Drum in 90-Day Hazardous Waste Accumulation Area



Photo 11 – Hazardous Waste Container in Paint Booth on Composites Site



Photo 12 – Hazardous Waste Container in Paint Booth on Composites Site

